



Cannabis Control Commission Public Meeting

Remote



Meeting Book - Cannabis Control Commission Public Meeting

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May 20, 2025

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and Chapter 2 of the Acts of 2025, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

**May 22, 2025
10:00 AM**

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

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Staff Recommendations on Changes of Ownership
 - 1. Castleleaf, LLC
- IV. Staff Recommendations on Renewal Licenses
 - 1. 253 Organic, LLC (#MRR207204)
 - 2. Assured Testing Laboratories LLC (#ILR267947)
 - 3. Blossom Flower, LLC (#MPR244324)
 - 4. Chill & Bliss II, LLC (#MRR207228)
 - 5. Green Gold Group, INC (#MRR207245)
 - 6. Greenfield Greenery LLC (#MCR140915)
 - 7. Hidden Wonders, LLC (#MRR207217)
 - 8. Holland Brands SB, LLC (#MRR207159)
 - 9. Nova Farms, LLC (#MRR207173)
 - 10. Nova Farms, LLC (#MCR140909)
 - 11. Tempest, Inc (#MRR207097)
 - 12. The Corner Emporium LLC. (#DOR5182979)
 - 13. VanGarden Cannabis, LLC (#MPR244287)
 - 14. VanGarden Cannabis, LLC (#MCR140884)
 - 15. ARL Healthcare, Inc. (#RMD1085)
 - 16. OCS Green Leaves, LLC (#RMD1706)
- V. Staff Recommendations on Final Licenses
 - 1. Hidden Wonders, LLC (#MR285040), Marijuana Retailer



- 2. Native Sun Wellness, Inc. (#MTC4128), Medical Marijuana Treatment Center
- VI. Hearing Officer Recommended Decision (*Vote*)
 - 1. Nature's Alternative, Inc.
- VII. Request for Equitable Relief (*Vote*)
 - 1. Deerfield Naturals, Inc.
- VIII. Commission Discussion and Votes
 - 1. Draft Governance Charter Discussion (*Vote*)
 - i. Executive Director Overview
 - ii. Commissioner Discussion
 - 2. Agent Registration Discussion *Acting Chair Bruce Stebbins*
 - 3. Job Description: Complaint Resolution Administrator and FY 2025/2026 Budgetary Impact (*Vote*) *Executive Director Travis Ahern, Chief People Officer Debra Hilton-Creek, Chief Financial and Accounting Officer Lisa Schlegel*
 - 4. Legal Intervention Update *General Counsel Kajal Chattopadhyay*
 - 5. Draft Guidance on Positive Impact Plans (*Vote*) *Licensing Manager Tsuko Defoe*
 - 6. Draft Guidance on Equity (*Vote*) *Director of Equity Programming and Community Outreach Silea Williams*
 - 7. Commission Election of Secretary *Acting Chair Bruce Stebbins*
- IX. New Business Not Anticipated at the Time of Posting
- X. Next Meeting Date
- XI. Adjournment

*Closed captioning available

If you need reasonable accommodations in order to participate in the meeting, contact the ADA Coordinator Debra Hilton-Creek in advance of the meeting. While the Commission will do its best to accommodate you, certain accommodations may not be available if requested immediately before the meeting.



Castleleaf, LLC
0301-COO-03-1124

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	CastleLeaf, LLC
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2. License(s) Affected by this Change Request:

License Number	License Type
MP282158	Marijuana Product Manufacturer
MR284521	Marijuana Retailer

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

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

Individual	Role
Siuranna Khachatryan	Person with Direct or Indirect Control

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

Entity	Role
Green Brighton, LLC	Entity with Direct or Indirect Control

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

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

8. 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.



MARIJUANA ESTABLISHMENT RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: MAY 22, 2025

RENEWAL OVERVIEW

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

	Licensee Name	License Number	Renewal Application Number	Location
1	253 Organic, LLC	MR282975	MRR207204	Amherst
2	Assured Testing Laboratories LLC	IL281360	ILR267947	Tyngsborough
3	Blossom Flower, LLC	MP282139	MPR244324	Holyoke
4	Chill & Bliss II, LLC	MR285090	MRR207228	Quincy
5	Green Gold Group, INC	MR281791	MRR207245	Charlton
6	Greenfield Greenery LLC	MC283117	MCR140915	Greenfield
7	Hidden Wonders, LLC	MR285040	MRR207217	Plymouth
8	Holland Brands SB, LLC	MR284733	MRR207159	Boston
9	Nova Farms, LLC	MR281379	MRR207173	Attleboro
10	Nova Farms, LLC	MC281841	MCR140909	Sheffield
11	Tempest, Inc	MR282541	MRR207097	Templeton
12	The Corner Emporium LLC.	DO100138	DOR5182979	Worcester
13	VanGarden Cannabis, LLC	MP281365	MPR244287	Leicester
14	VanGarden Cannabis, LLC	MC281487	MCR140884	Leicester

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 provided a compliant HCA or HCA Waiver, that was accepted by Commission staff pursuant to 935 CMR 500.180(3).
5. All licensees have paid the appropriate annual license fee.
6. The licensees, when applicable, have been inspected during the current renewal period.
7. 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: MAY 22, 2025

RENEWAL OVERVIEW

1. Name, license number, host community, for each Medical Marijuana Treatment Center presented for renewal:

	Licensee Name	License Number	Host Community (Cultivation)	Host Community (Dispensing)
15	ARL Healthcare, Inc.	RMD1085	New Bedford	Middleborough
16	OCS Green Leaves, LLC	RMD1706	Millbury	Millbury

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.100(5).
3. All licensees have paid the appropriate annual license fee.
4. All licensees provided a compliant HCA or HCA Waiver, that was accepted by Commission staff pursuant to 935 CMR 500.180(3).
5. The licensees, when applicable, have been inspected during the current renewal period.
6. 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 501.405.

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.



Hidden Wonders, LLC

MR285040

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Hidden Wonders, LLC
Licensed Location:	27 Robert J. Way, Unit 1, Plymouth, MA 02360

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

License Type(s) Sought:
Marijuana Retailer

3. The licensee is associated with the following license type(s):

The licensee is not associated with any other license applications or licenses.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on March 7, 2024.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): March 26, 2025.



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 licensee 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.



Native Sun Wellness, Inc.
MTC4128

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Native Sun Wellness, Inc.
Licensed Cultivation Location:	140 Industrial Road, Fitchburg, MA 01420
Licensed Manufacturing Location:	140 Industrial Road, Fitchburg, MA 01420
Licensed Dispensary Location:	37 Coolidge Street, Hudson, MA 01749

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

License Type(s) Sought:
Medical Marijuana Treatment Center

3. The licensee is associated with the following license type(s):

Type	Status	Location
Marijuana Retail	Commence Operations	Hudson

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 13, 2024
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): November 13, 2024 and November 20, 2024.
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 licensee was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

- d. Product Manufacturing Operation



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

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

e. Retail Operation

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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, 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.



COMMONWEALTH OF MASSACHUSETTS

WORCESTER COUNTY

CANNABIS CONTROL COMMISSION

IN THE MATTER OF

Nature's Alternative, Inc.

CCC-HO-24-0003

License No. MR283325

RECOMMENDED DECISION ON MOTION TO DISMISS

On February 14, 2025, the Cannabis Control Commission filed a motion to dismiss the above-captioned action. For the reasons stated below, I recommend that the motion to dismiss be granted.

Authority and Jurisdiction

Pursuant to its authority under M.G.L. c. 94G, § 4(a)(xxiv) and (g), the Cannabis Control Commission has the authority to delegate to a Hearing Officer the authority to conduct an administrative hearing. Commission regulations provide that Licensees who are issued a cease and desist or summary suspension order under 935 CMR 500.350(2) shall be afforded a hearing with a hearing officer. 935 CMR 500.350(5)(a) and (b). Such hearings must be conducted pursuant to the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.00 et seq. 935 CMR 500.350(5)(c). The Hearing Officer shall electronically mail a copy of the recommended decision to each Licensee or Registrant and their attorney(s) of record. 935 CMR 500.350(5)(c).

Procedural History

On August 28, 2024, the Commission issued a Summary Suspension Order ("Order") "requiring the immediate suspension of License No. MR283325 held by Nature's Alternative, Inc. (the 'Respondent'), the immediate suspension of all agent registrations associated with Respondent, and the cessation of all licensed operations having determined that Respondent effectuated a change of control of its license without proper notice to or approval by the Commission." The Commission stated in its Order that it was acting pursuant to its authority under G.L. c. 94G, §§ 4(a)(xi) and (a½)(xi) and 935 CMR 500.350. The effective date of the Order was August 30, 2024, and the Order stated that the Respondent could request a hearing no later than 21 calendar days after its effective date and that the hearing would be subject to the Standard Adjudicatory Rules of Practice and Procedure, which includes 801 CMR 1.01, 801 CMR 1.02, and 801 CMR 1.03.

On September 20, 2024, Andrew Wilkes, who stated that he was Member Manager of AW Funding, LLC, submitted a hearing request form in this matter.

On February 13, 2025, I sent an Acknowledgment of Filing and Notice of Pre-hearing Conference to Commission enforcement counsel and to Andrew Wilkes by email. I attached a Notice of Appearance form with my email and requested that Andrew Wilkes return it to me by February 27, 2025. I further noted that under 801 CMR 1.01(3)(a), only an attorney or an authorized officer or employee may represent a corporation in an adjudicatory proceeding.

On February 14, 2025 at 11:46 a.m., I received an email from a Matthew Wilkes, copying Andrew Wilkes and Commission enforcement counsel, in which he stated in relevant part: “Good Morning All, Yesterday the Commission approved our change of ownership (attached). There is no longer a need for a hearing as we are no longer the owners of the referenced license. Kindly, cancel the hearing.” The email attached a February 13, 2025 document on Commission letterhead titled “Notice of Change of Ownership and Control Approval” that stated that the Commission had approved a proposed and requested change of ownership and control pertaining to License No. MR283325.

On February 14, 2025 at 12:16 p.m., I received an email from Commission enforcement counsel attaching a motion to dismiss in this matter. The motion stated in relevant part: “As of February 13, 2025, Respondent has complied with the imposed conditions of the Order. The Commission also approved Respondent’s Change of Ownership and Control application at a public meeting remedying the violation. Accordingly, the Commission moves to rescind its order and suspension of Respondent’s License and associated Agent Registrations through the dismissal of this action.” Commission enforcement counsel attached a Certificate of Service certifying that it had served the motion to dismiss on Andrew Wilkes, whom Commission enforcement counsel described as the former Owner of Record, and Nicholas Saba, whom Commission enforcement counsel described as the current Owner of Record.

Commission enforcement counsel’s February 14, 2025 email attaching its motion to dismiss was the last substantive communication I received from any of the parties concerning the matter.

On February 24, 2025, I sent the parties a Ruling on Motion to Dismiss (“Ruling”) that purported to grant the Commission’s motion to dismiss. On March 26, 2025, I sent the parties a Notice rescinding my February 24, 2025 Ruling, stating that the ruling should have been styled as a Recommended Decision for the Cannabis Control Commission and informing the parties that I would issue a Recommended Decision forthwith. See Soe v. Sex Offender Registry Board, 466 Mass. 381, 395 (2013)(“An administrative agency, in the absence of statutory limitations, generally has the inherent authority to reconsider a decision or reopen a proceeding to prevent or mitigate a miscarriage of justice.”)

Analysis

I begin by addressing the applicable rules. The Order said that any hearing would be conducted under the Standard Rules of Adjudicatory Rules of Practice and Procedure, but it did not specify

whether the hearing would be conducted under the Formal Rules (801 CMR 1.01) or the Informal/Fair Hearing Rules (801 CMR 1.02). The two sets of rules vary in how they treat motions to dismiss.

Under the Formal Rules, if a party files a motion to dismiss, any other agency or party may file a response within seven days and request a hearing. 801 CMR 1.01(7)(a)(1). The presiding officer may act on a motion when all parties have responded or the deadline for response has expired, whichever occurs first. 801 CMR 1.01(7)(a)(2). Motions to dismiss may be made on the grounds that the petitioner has not established their case; that a party has failed to prosecute or defend their claim; or for other good cause, such as a lack of jurisdiction, failure of the petitioner to state a claim upon which relief can be granted, or the pendency of a prior, related action in any tribunal that should first be decided. 801 CMR 1.01(7)(g).

The Informal Rules do not set forth general timeframes for parties to respond to motions or for presiding officers to rule on them. Rather, they establish specific deadlines only for responding to motions for dismissal based on a party's failure to appear or failure to prosecute. 801 CMR 1.02(10)(d) and (3). The Informal Rules state that for other requests: "A Party may request rulings or relief in writing at any time or orally during a hearing. After providing notice to the other Parties, the Agency or Presiding Officer shall rule on the request with or without a hearing." 801 CMR 1.02(7)(c).

Here, I waited seven days to evaluate the Commission's motion to dismiss because the Order included a citation to the Formal Rules, which gives a party seven days to respond to a motion. 801 CMR 1.01(7)(a)(1). During those seven days, I did not receive any communication in response to the Commission's motion to dismiss from any individual purporting to represent the Respondent, including Andrew Wilkes.

Because the Respondent has not opposed the Commission's motion, I accept the statement in the Commission's motion regarding its own actions as true and therefore recommend that the motion to dismiss this action be granted on the basis that the controversy between the parties is moot, which means there is no live case or controversy over which I have jurisdiction. 801 CMR 1.01(7)(g)(3). Specifically, the Commission represented in its motion to dismiss that it had approved the Respondent's Change of Ownership and Control application at a public meeting, thereby remedying the alleged violation that gave rise to the order under 935 CMR 300.350.

The Commission appeared also to seek permission to rescind its Order and the suspension of the Respondent's License and associated Agent Registrations through dismissal of this action. In my view, the Commission does not need the hearing officer's permission to effect such rescission. Rather, the Commission's regulations state that the Commission may modify, amend, or rescind a cease and desist or summary suspension order at any time after its issuance on condition(s) just to all parties. 935 CMR 500.350(3)(b). If the Commission rescinds an order on which a hearing has been requested, the hearing request will remain in effect until the case is dismissed, including through a motion to withdraw a hearing request and dismiss the action by the requesting party (see discussion in the next paragraph), but the existence of an outstanding hearing request does not limit the Commission's rescission authority.

Finally, I note that under the Formal Rules, a party may, by motion, withdraw a request for review, 801 CMR 1.01(6)(g), and that under the Informal Rules, a petitioner may, with the approval of the agency or the presiding officer, withdraw a request for an adjudicatory proceeding in a writing signed by the petitioner or their authorized representative. 801 CMR 1.02(7)(a). Although I received an email from Matthew Wilkes on February 14, 2025 requesting that the hearing in this matter be canceled, I did not treat this as a withdrawal of the Respondent's request for a hearing because Matthew Wilkes had neither filed the hearing request form nor filed a Notice of Appearance.

RECOMMENDED DECISION

For the reasons stated above, I recommend that the Cannabis Control Commission's February 14, 2025 motion to dismiss be granted.

The parties are hereby notified that within 21 days of the date of this decision, they may submit to the Commission written objections and arguments regarding my Recommended Decision via email at hearings@cccmass.com. See 935 CMR 500.500(11)(c).

CANNABIS CONTROL COMMISSION

by:

Mikaela McDermott

Mikaela A. McDermott
Hearing Officer
Cannabis Control Commission
Union Station, Second Floor
2 Washington Square
Worcester, MA 01604
Main Office: (714) 415-0200
mikaela.mcdermott@cccmass.com

Dated: March 26, 2025

Notice sent to:

Andrew Wilkes
Member Manager, AW Funding, LLC
Phone: 401-241-5470
Email: aw@awilx.com

Jacob Nielson
Cannabis Control Commission
Union Station, Second Floor
2 Washington Square
Worcester, MA 01604
Telephone: (774) 670-4091
Email: Jacob.Nielson@cccmass.com

Request for Equitable Relief Deerfield Naturals, Inc.

REQUEST FOR EQUITABLE RELIEF OVERVIEW

1. Licensee Information:

Licensee Business Name:	Deerfield Naturals, Inc.
Licensee d/b/a Name:	N/A

2. License(s) affected by this Request:

License Number	License Type	License Status
MC281426	Marijuana Cultivator	Provisional License (expired)
MP281541	Marijuana Product Manufacturer	Provisional License (expired)
MR281929	Marijuana Retailer	Provisional License (expired)

3. Host Community affected by this Request:

Town of Deerfield

4. The Licensee is seeking the following relief:

- ☒ Extension of License Expiration Date with No Fee
- ☒ Waiver of Change of Location Fee
- ☐ Institution of procedures for winding down the Licensee's operations at the Licensed Premises
- ☒ Other Equitable Relief

RECOMMENDATION

The above Licensee submitted a request for equitable relief pursuant to 935 CMR 500.180(3)(c)6 on October 16, 2024. The request for equitable relief, including attachments, is attached to the recommendation as Exhibit 1, Equitable Relief Request Deerfield Naturals, Inc. After review of the Licensee's request for equitable relief, Commission staff recommends consideration of the



following equitable relief sought by the Licensee. Equitable relief may be granted or denied by the Commission at its discretion.

Background

Deerfield Naturals, Inc. (“Deerfield Naturals” or “Licensee”) is a provisionally licensed Marijuana Retailer (MR281929), Marijuana Cultivator (MC281246), and Marijuana Product Manufacturer (MP281541). All Licenses held by Deerfield Naturals expired on October 29, 2024.

On August 21, 2024, the town of Deerfield Selectboard notified Deerfield Naturals that the town no longer intended to continue as a Host Community for the Licensee. *See* Exhibit 1, at 5; Exhibit 2, Town of Deerfield, Select Board Meeting Notice and Agenda (Aug. 21, 2024); Exhibit 3, Town of Deerfield, Select Board Meeting Notice and Agenda (Aug. 23, 2024); *see also* [Town of Deerfield Special Selectboard Meeting \(Aug. 23, 2024\)](#). In support of its determination to end relations with Deerfield Naturals, the town cited that the Licensee has not commenced operations or received final licensure, and that the Licensee’s Site Plan Approval and Special Permit are expired. *See* Exhibit 1, at 5. Despite this notice, the Licensee indicated that it “intends to continue working with the Town to address the Town’s concerns and amend the Host Community Agreement to bring it into compliance with 935 CMR 500.000.” *Id.*

In support of its request, Deerfield Naturals cited significant delays in obtaining final licensure due to “the COVID-19 pandemic and issues accessing reliable banking services.” Exhibit 1, at 4. Further, the Licensee asserts that, prior to receiving the letter on August 21, 2024, there were representations by the town indicated that it was amenable to renegotiating the Host Community Agreement (“HCA”) and continuing to serve as a Host Community. *See id.* The Licensee also cites its payment of its annual License renewal fee and historic payments of required fees. *See id.* Deerfield Naturals stated its rationale for submitting this request is to “salvage its licenses without suffering additional burdensome expense and/or mitigate negative financial impacts to [the Licensee] should the licenses ultimately not be renewed.” *Id.*

Requested Relief

Deerfield Naturals seeks the following Equitable Relief:

1. Extension of its License expiration dates with no fee;
2. If it is unable to obtain a compliant HCA with the town of Deerfield, waiver of the change of location fee; and
3. If it is unable to find a suitable new location, a refund of the license renewal fees paid to the Commission on August 20, 2024.

Recommended Action



Deerfield Naturals has satisfied the conditions required for the consideration of equitable relief by the Commission. Accordingly, Commission staff recommend consideration of some or all of the following Equitable Relief.

1. As Deerfield Naturals' Licenses expired on October 29, 2024, the Commission may consider approving the reinstatement of its Marijuana Retailer (MR281929), Marijuana Cultivator (MC281246), and Marijuana Product Manufacturer (MP281541) Licenses and extending the License expiration date without a pro-rated fee. If the Commission elects to grant this Equitable Relief, Commission staff recommend imposing a reasonable expiration date for the Licenses;

and

2. The Commission may consider granting a waiver of the Change of Location fee. If the Commission elects to grant this relief, Commission staff recommend imposing a condition to require the Licensee to confirm that it has in fact ceased negotiation with the town of Deerfield and submit the required Change of Location application within a reasonable amount of time, as determined by the Commission;

or

3. If the Commission does not grant the relief articulated above, the Commission may consider granting a refund of the Annual License Fee remitted by Deerfield Naturals to the Commission on August 20, 2024. If the Commission elects to grant this relief, Commission staff recommend imposing a condition to require the surrender of all Licenses prior to the issuance of any refund.

Pursuant to 935 CMR 500.180(3)(c)6.c., the Commission may also exercise its discretion to consider other means of equitable relief.



Memorandum

To: Travis Ahern, Executive Director
Cc: Andrew Carter, Chief of Staff
Lisa Schlegel, Chief Financial and Accounting Officer
Kajal Chattopadhyay, General Counsel
Michael Baker, Deputy General Counsel
Katherine Binkoski, Director of Investigations
Mercedes Erickson, Project Manager
Matt Giancola, Director of Government Affairs and Policy
Roque Rosa, I&E Executive Assistant
Abigael Vogt, Executive Assistant
Enforcement Paralegals
From: Timothy Goodin, Enforcement Counsel
Reviewer: Nomxolisi K. Jones, Chief of Investigations and Enforcement
Date: May 16, 2025
Subject: Addendum to Equitable Relief Recommendation – Deerfield Naturals, Inc. –
FOR ACTION
Importance Level: Routine

PURPOSE: Provide an update relative to the Equitable Relief Recommendation approved by the Executive Director (ED) on April 18, 2025 for consideration by the Cannabis Control Commission (“Commission”).

REQUEST ACTION BY: May 20, 2025

BACKGROUND: On April 18, 2025, ED Ahern approved a recommendation relative to Deerfield Naturals, Inc.’s (“Deerfield Naturals”) request for equitable relief. The recommendation provided 3 options for consideration by the Commission.¹ See Exhibit 1, Recommendation, Request for Equitable Relief (Apr. 17, 2025).

¹ For reference, the three options contained in the recommendation are as follows:

1. As Deerfield Naturals’ Licenses expired on October 29, 2024, the Commission may consider approving the reinstatement of its Marijuana Retailer (MR281929), Marijuana Cultivator (MC281246), and Marijuana Product Manufacturer (MP281541) Licenses and extending the License expiration date without a pro-rated fee. If the Commission elects to grant this Equitable Relief, Commission staff recommend imposing a reasonable expiration date for the Licenses;

and



Before submission of this recommendation for consideration by the full Commission, the Enforcement division (Enforcement) attempted to contact Deerfield Naturals to ensure that it was still interested in receiving consideration of the requested relief. Enforcement did not receive a response prior to the meeting materials deadline. Following submission of the recommendation, however, Deerfield Naturals responded to Enforcement and indicated that it is now only interested in consideration of Option 3, as contained below:

3. If the Commission does not grant the relief articulated above, the Commission may consider granting a refund of the Annual License Fee remitted by Deerfield Naturals to the Commission on August 20, 2024. If the Commission elects to grant this relief, Commission staff recommend imposing a condition to require the surrender of all Licenses prior to the issuance of any refund.

As always, the Commission may also exercise its discretion to consider other means of equitable relief in accordance with 935 CMR 500.180(3)(c)6.c.

RECOMMENDATION: Approve addendum for submission to the Commission for consideration in conjunction with the equitable relief recommendation relative to Deerfield Naturals.

EXECUTIVE DIRECTOR DECISION:

- ☐ Approve
- ☐ Deny
- ☐ Edit and resubmit
- ☐ Need more information: _____

-
2. The Commission may consider granting a waiver of the Change of Location fee. If the Commission elects to grant this relief, Commission staff recommend imposing a condition to require the Licensee to confirm that it has in fact ceased negotiation with the town of Deerfield and submit the required Change of Location application within a reasonable amount of time, as determined by the Commission;

or

3. If the Commission does not grant the relief articulated above, the Commission may consider granting a refund of the Annual License Fee remitted by Deerfield Naturals to the Commission on August 20, 2024. If the Commission elects to grant this relief, Commission staff recommend imposing a condition to require the surrender of all Licenses prior to the issuance of any refund.



The Massachusetts Cannabis Control Commission Charter

A Document to Promote Good Governance

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Purpose

To foster a positive, productive, and collaborative work environment based on mutual respect and to provide further guidance concerning the Cannabis Control Commission's (Commission) duties, Commissioners and the Executive Director, in collaboration with Staff, have established this charter.¹

Background

1. The general roles and responsibilities of the Commission are set out in its governing laws, G. L. c. 10, § 76, G. L. c. 94G, § 4, and G. L. c. 94I, § 7. The Commission is an independent agency that was established by Chapter 55 of the Acts of 2017 in July of 2017.
2. The mission of the 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. 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.

3. The Commission is comprised of both the group of five appointed Commissioners and the administrative agency.
4. Pursuant to Massachusetts General Laws G. L. c. 10, § 76 (a), the Commission is composed of five Commissioners; one with a background in public health, mental health, substance use or toxicology, who is appointed by the governor; one with a background in public safety, who is appointed by the attorney general; one with experience in corporate management, finance or securities, who is appointed by the treasurer and receiver-general; one with professional experience in oversight or industry management, including commodities, production or distribution in a regulated industry; and one with a background in legal, policy or social justice issues related to a regulated industry.

¹ Nothing in this document shall contradict or be interpreted to limit or contradict the authorities and obligations of the Commission by the Massachusetts General Laws.



The latter two Commissioners are appointed by a majority vote of the governor, attorney general and treasurer and receiver-general. The treasurer and receiver-general designates the Chair of the Commission.

5. Pursuant to G. L. c. 10, § 76 (e), three Commissioners constitute a quorum, and Commission decisions and approvals are made by an affirmative vote of 3 Commissioners.
6. The combined expertise, knowledge, and lived experience of the five Commissioners provides the Commonwealth with the capacities needed to achieve the mission of the Commission.

Roles and Responsibilities

1. The Commissioners, including the Chair:
 - a. As stewards of the Commission and in working to achieve the Commission's statutory mandates and mission, the Commissioners:
 - i. Act in the best interests of the Commission and on behalf of the public;
 - ii. Act to ensure a safe, equitable, and effective medical and adult-use cannabis industry;
 - iii. Work with the Executive Director or through the Executive Director, and work with Commission Staff (Staff) to support fulfilment of Commissioner roles and responsibilities with respect for their obligations, as public officials, to Commonwealth citizens, taxpayers, residents, and stakeholders in the cannabis industry, including but not limited to patients, consumers, and other industry participants; and
 - b. As policymakers, the Commissioners:
 - i. Deliberate on² and make policy decisions on the overall direction of the Commission and the medical and adult-use cannabis industry in Massachusetts; and
 - ii. May delegate or rescind statutory and regulatory responsibilities of the Commissioners to the Executive Director.
 - c. As regulators, the Commissioners promulgate regulations for medical and adult-use marijuana.³
 - d. As licensors, the Commissioners:

² <https://www.mass.gov/service-details/open-meeting-law-educational-materials>

³ G. L. c. 94G, §§ 4 (a) (xxiv) and (g) and G. L. c. 94I, § 7



- i. Consider and take any relevant action on applications for licensure and licenses, including deciding on the suitability of applicants and enforcement actions, including but not limited to the revocation and suspension of licenses;
 - ii. Maintain separation and impartiality between their adjudicatory and administrative functions, as detailed in paragraph 10 of the Section on Interactions Between and Among Commissioners, Executive Director, and Staff; and
 - iii. Accredit education providers to operate Responsible Vendor Training programs.
- e. In relation to the administrative agency, the Commissioners:
 - i. Hire, discipline, and terminate the Executive Director;⁴
 - ii. In consultation with the Executive Director, establish and vote to approve the annual goals of the Executive Director and may participate in activities that support those goals;
 - iii. Consider and approve the Commission's proposed fiscal year budget request that reflects the Commission's strategic priorities;
 - iv. Review spending and remaining resources at the midpoint of each fiscal year;
 - v. Conduct assessments and performance reviews for the Executive Director in relation to the Executive Director annual goals; and
 - vi. Approve job descriptions for new and/or (significantly) revised positions proposed by the Executive Director.
 - vii. At the discretion of the Executive Director, at least one and no more than two Commissioners may serve on each interview panel for chief level positions.
 - viii. Participate, upon approval of the Executive Director, on project charter working groups.
 - ix. Are Commission employees and shall adhere to the agency's policies and procedures, including but not limited to the Employee Handbook, Managers Code of Conduct, and the Enhanced Code of Ethics.
- f. The Commissioners contribute, but are not limited to, their topic-specific expertise and lived experience to address all Commission matters.
- g. As public officials, and notwithstanding their role as adjudicators, the Commissioners:
 - i. Share expertise, updates, and insight on the development of the industry and engage stakeholders to learn and understand all aspects of the cannabis industry, in accordance with Commission approved policy;
 - ii. Contribute to public awareness and engagement with the Commission on issues affecting the cannabis industry, medical and adult-use consumers, and the public; and

⁴ G. L. c. 10, § 76 (j)



- iii. May advocate for policies and testify before Legislative and Regulatory Committees in support of official Commission business (i.e. policies supported by a majority vote of Commissioners).
- iv. Provide periodic updates to their Appointing Authority(ies) regarding their work.

2. The Commission Chair:

- a. Exercises supervision and control over the affairs of the Commission by serving as presiding officer at all public meetings and hearings at which the chair is present, designating a commissioner to act as chair in the chair's absence, and making division or re-division of the work of the commission among the commissioners as the chair deems expedient;⁵
- b. Coordinates Commission work and project assignments amongst Commissioners;
- c. Works cooperatively with the Executive Director on, including but not limited to, policy matters, outreach, internal and external communications, Commissioner meeting preparation, agenda setting, work and project assignments of Commissioners, and accountability;
- d. Sets the agenda for public meetings⁶ that occur in the normal course of Commission activities, after obtaining input from the other Commissioners and in consultation with the Executive Director;
- e. Presides over public meetings and hearings and manages discussions and ascertains the votes of the Commissioners in accordance with Robert's Rules of Order;
- f. Designates a Commissioner to act as Chair for hearings and public meetings in the Chair's absence.⁷ The Secretary may serve as Chair if the Chair is absent and has not previously designated another Commissioner to act as Chair for a public meeting. If a Chair is removed or suspended by the appointing authority, the remaining Commissioners will elect an Acting Chair until the appointing authority designates the Chair;⁸
- g. Solicits interest among the Commissioners for the positions of Treasurer and Secretary at the Commission public meeting held prior to the January public meeting and takes nominations and presides over votes for those positions during the January public meeting;
- h. Monitors and tracks the work of the Treasurer and Secretary;
- i. Supports productive functioning of the Commissioners as a working board; and
- j. Testifies in support of the annual General Appropriations Act with the Executive Director and may designate additional participants in consultation with the Executive Director.

⁵ G. L. c. 10, § 76 (h) and (i)

⁶ G. L. c. 10, § 76 (e)

⁷ G. L. c. 10, § 76 (d) and (h)

⁸ G. L. c. 94G, § 4 (a)



3. The Commission Treasurer:

- a. Is elected by the Commissioners⁹ at the first public meeting of the calendar year to serve a one-year term or until a successor is appointed;
- b. Participates in finance compliance and transparency, and develops an understanding of the financial reporting, structures, and procedures, of the Commission;¹⁰
- c. In collaboration with the Chief Financial and Accounting Officer (CFAO), through the Executive Director:
 - i. Serves as signatory for monthly expenditures authorized by the CFAO in a timely manner, consistent with reporting requirements;
 - ii. Conducts regular review meetings, through the Executive Director, with the CFAO and Fiscal staff to discuss budget execution, revenues, and fiscal issues, such as rate of spending or any unplanned costs;
 - iii. Monitors the status of the Commission's budget request in the state budget process, as reported by the Director of Government Affairs and Policy, through the Executive Director;
- d. In support of their testimony for the annual General Appropriations Act, the Chair and the Executive Director will collaborate with the Treasurer, CFAO, and other agency leadership as needed; and
- e. May opt to provide a Treasurer's report to the Commissioners, if placed on the agenda for a public meeting.

4. The Commission Secretary:

- a. Is elected by the Commissioners¹¹ at the first public meeting of the calendar year to serve a one-year term or until a successor is appointed;
- b. Coordinates with the General Counsel and Legal Staff to:
 - i. Prepare the public session minutes, in a timely manner¹², for approval at a public meeting of the Commissioners, consistent with reporting requirements;
 - ii. Review on a tri-annual basis, the minutes from executive sessions and determine if they may remain protected or may be presented for approval at a public meeting of the Commissioners;
 - iii. Serve as Keeper of the Records¹³ or delegate in writing to the General Counsel;

⁹ G. L. c. 10, § 76 (g) and (j)

¹⁰ G. L. c. 10, § 76 (j)

¹¹ G. L. c. 10, § 76 (g)

¹² 940 CMR 29:11(2)

¹³ G. L. c. 10, § 76 (g)



- iv. Review bi-annual updates on public records requests received by the Records Access Officer (RAO), including the Commission's annual report to be filed with the Secretary of the Commonwealth's (SOC) Supervisor of Public Records;
- v. Consult with the RAO, through the Executive Director and/or General Counsel, regarding procedures to destroy records in accordance with the State's records retention schedule¹⁴;
- vi. Track promulgation timelines established by the SOC's Regulations and Publications Division during policy and regulatory review processes; and
- vii. In consultation with the Executive Director, Chair, General Counsel, and Chief People Officer, promotes compliance with all required Commissioner trainings;
- c. Works with the Executive Director, Legal Department, and appropriate staff to ensure that any legislatively required reports (annual activities report and tax rate) are submitted to the appropriate branches of government;
- d. Is designated by the Chair to serve as Chair for a public meeting if the Chair is absent and has not previously designated another Commissioner to act as Chair for a public meeting; and
- e. May opt to provide a Secretary's report to the Commissioners, if placed on an agenda for a public meeting.

5. The Executive Director:

- a. Is the executive and administrative head of the Commission, responsible for administering and enforcing the Commonwealth's cannabis laws and regulations and managing the agency's administrative units;¹⁵
- b. Directs, manages, and coordinates all work and day to day activities of the Staff;
- c. Is hired by and serves at the will of the Commissioners;¹⁶
- d. Advises and counsels Commissioners on policy development;
- e. Works cooperatively with the Commissioners, in consultation with appropriate Staff, to carry out the Commission's statutory mandates and mission;
- f. Alerts Commissioners of urgent public health, safety, and welfare incident(s) as soon as the circumstances reasonably permit;
- g. Serves and represents the Commission as a subject matter expert on a broad range of regional, national, and global platforms;

¹⁴ G. L. c. 30, § 42

¹⁵ G. L. c. 10, § 76 (j)

¹⁶ Id.



- h. Executes and implements Commission-delegated authorities and reports a summary of activities taken under delegated authority on a quarterly basis to the Commissioners;
- i. Administers and enforces Commission regulations and policies and applicable state and federal laws by, with, and through Department Heads and appropriate Staff;
- j. Either directly or through a designee:
 - i. Hires, disciplines, and terminates employees in consultation with the Chief People Officer and General Counsel or Legal department designee in accordance with Commission's personnel policies and applicable laws;
 - ii. Negotiates contracts with union and non-union employees in consultation with the Chief People Officer and General Counsel or Legal department designee;
 - iii. Hires employee contractors in consultation with the Chief People Officer and Chief Finance and Accounting Officer as necessary;
 - iv. Enters into and executes contracts with suppliers and vendors in consultation with the Chief Finance and Accounting Officer and General Counsel or Legal department designee and in accordance with Standard Operating Procedure limits; and
 - v. Hires outside counsel, in consultation with the General Counsel and appropriate staff, as needed;
- k. Coordinates with the Commission Chair on the public meeting agenda;
- l. Attends public meetings of the Commission and provides updates, or with notification to the Chair, assigns a designee as necessary;
- m. Proposes annual goals for Commissioners' consideration and approval and seeks to achieve those goals through the work of the entire Commission;
- n. Coordinates with Commissioners, CFAO, Department Heads and other relevant Staff to develop budget proposals and prioritize initiatives;
- o. Works with the CFAO to develop FY and supplemental budgets based on priorities and assists with presenting the budget proposals to the Commissioners for final approval;
- p. Provides fiscal impact analysis information, with support from Staff, during the regulatory promulgation process to ensure Commissioners understand the costs and benefits of proposed regulations and regulatory changes;
- q. Provides information to Commissioners on potential fiscal impacts of amending the Executive Director's annual goals;
- r. Testifies before Legislative and Regulatory Committees in support of the Commission;
- s. Serves as Chair of the Cannabis Advisory Board (CAB)¹⁷, annually solicits interest from Commissioners and based on their interests, appoints Commissioner liaisons to CAB subcommittees;

¹⁷ G. L. c. 10, § 77



- t. Coordinates responses to Commissioner requests for information and Staff support;
- u. As appropriate, informs, coordinates, and/or consults with the Commissioners and General Counsel on working with the Office of the Attorney General to seek representation and manage litigation strategy involving the Commission;
- v. Exercises emergency administrative powers to protect Staff and/or ensure public health and safety, if practicable, in collaboration with the Chair;
- w. Works cooperatively with the Chair on matters, including but not limited to, policy, outreach, internal and external communications, Commissioner meeting preparation, agenda setting, and work and project assignments of Commissioners;
- x. Works cooperatively with the Treasurer and the Secretary to fulfill their required roles; and
- y. Works with each Department to create relevant Commission Policies and Standard Operating Procedures (SOPs), consults with Commissioners for input and feedback, and the Executive Director approves all Policies and SOPs.

Interactions Between and Among Commissioners, Executive Director, and Staff

The Commissioners, Executive Director, and Staff function as a collaborative unit to accomplish the mission of the Commission. To that end, the following code of practice for interactions among them is established:

1. The Commissioners respect the position of the Executive Director in managing the Commission's staff and will follow the supervisory chain of accountability. The Commissioners also respect the ongoing work obligations of the Staff in performing their regular day to day functions.
2. The Executive Director respects the Commissioners' need for staff resources and information and will work with the Chair and Commissioners to identify appropriate staff resources and information, but is ultimately responsible for prioritizing all staff resources.
3. The Staff respects the roles of the Executive Director and the Commissioners in their co-governance of the Commission, including their priorities, procedures implemented by the Executive Director, and policies approved by the Commissioners, and Staff understand that they shall work through the appropriate chain of accountability (Staff->Manager->Director->Chief->ED) with the exception of any accountability protocols outlined below



4. Commissioner requests for information and data will be made through the Executive Director and approved by appropriate Department Heads following the appropriate chain of accountability (ED->Chief->Director->Manager->Staff). Commissioners and Staff are encouraged to mutually engage with each other in accordance with the Open Meeting Law and with respect for Staff and Commission work priorities.
5. Commissioner requests for staff resources will be made through the Executive Director and approved by appropriate Department Heads following the appropriate chain of accountability (ED->Chief->Director->Manager->Staff), to ensure proper triage of requests.
6. Commissioners may contact, through the Executive Director, a topic sponsor of a public meeting agenda item in preparation for a Commission public meeting. Sponsoring staff may also request time to brief Commissioners in advance of a public meeting. If the sponsor is a Commissioner, the Open Meeting Law applies.
7. Urgent Commissioner policy or operational questions will be directed to the Executive Director.
8. A project charter, which must be reviewed and approved by the Executive Director, allows for Commissioner and staff interactions based on its project scope and staff resource allocations. Not all projects initiated with project charters may include Commissioner participation.
9. The Executive Director shall be responsible for developing protocols and procedures to execute the Commission's regulations and policies, and once approved by the ED, will notify the Chair and Commissioners.
10. Commissioners understand the requirements under M. G. L. c. 30A to adjudicate licensing and enforcement matters fairly and objectively. As such:
 - a. Commissioners may request from the Executive Director and the Chief of Investigations and Enforcement, information on an open due diligence review or investigation, limited to current status and an estimated timeline and consistent with the Commissioners' adjudicatory role.
 - b. A Commissioner, who receives a complaint alleging noncompliance of the Commission's laws or regulations, shall share that concern or complaint with the Executive Director and the Chief of Investigations and Enforcement.
 - c. With guidance from the Executive Director, the Chief of Investigations and Enforcement, and the General Counsel, subject to applicable laws regarding disclosure of confidential or



privileged information, Commissioners will be careful and cautious about public disclosure of information to protect the integrity of investigations.

- d. Commissioners and Executive Director will familiarize themselves with investigation and enforcement Policies and SOPs.
- e. Commissioners and Executive Director will be informed by the General Counsel or delegee in writing when an adjudicatory hearing subject to G. L. c. 30A is requested and will refrain from ex parte communications with any parties, or those identified as representing such parties in official or unofficial capacities, to that pending matter.
- f. Commissioners will inform the Executive Director and the Chief of Investigations and Enforcement of any invitation or plan to visit a licensee in their official capacity, prior to acceptance of such an invitation.
- g. Commissioners will serve their adjudicatory functions in accordance with G. L. c. 30A, Commission governing laws, applicable regulations, and established standards for the conduct of public officials serving on a Commission in the Commonwealth.¹⁸

- 11. The Executive Director and General Counsel will inform Commissioners of a material threat or pending litigation related to the Commission in accordance with Commission standard operating procedure. This provision shall not act to interfere with the Executive Director and General Counsel's ability to act on an emergency basis if necessary to protect the Commission's interests.
- 12. A Commissioner, who is informed of a human resources concern or complaint, will share that concern or complaint with the Chief People Officer and Executive Director. The Chief People Officer or delegee will assess that concern or complaint and report back to the Executive Director. In the event the Chief People Officer and/or the Executive Director is the subject of the complaint, the Commissioner will share that concern with the General Counsel.
- 13. The Commissioners, Executive Director, and staff are committed to compliance with the Massachusetts Open Meeting Laws, including restrictions on serial communications with or among more than two Commissioners.

External Affairs

Commissioners and the Executive Director are considered cannabis subject matter experts by

¹⁸ See the most recent version of the Office of the Attorney General's "Conducting Administrative Adjudicatory Proceedings," particularly Chapter 7.



Legislative and Executive Branches of government and may engage with municipal, tribal, state, federal, and international government entities in accordance with approved Legislative and Executive Outreach policy.

1. In an effort to speak with one Commission voice, the Executive Director, in coordination with Staff, serves as strategic advisors for the Commissioners and manages press and media engagements, in collaboration with the Chair and the other Commissioners.
2. All Commissioners serve as official agency spokespersons, who may speak on behalf of the Commission on items that have been fully vetted and approved by an affirmative vote of 3 Commissioners. Upon approval of an item by Commissioners, the Executive Director may direct Staff to support Commissioners and prioritize that item.
3. The Chair is the acknowledged de facto spokesperson for long term strategic planning initiatives, urgent and exigent circumstances, and general Commission matters. The Executive Director is the de facto spokesperson on administrative, personnel, and operational matters. The Chair and Executive Director shall collaborate in determining the appropriate person to represent the Commission on communication matters as they arise.
4. If a Commissioner opposes a Commission decision that was approved by an affirmative vote of 3 Commissioners, they may share their reasons for doing so. In response to media inquiries, Commissioner(s) will be supported, through the Executive Director, by the Communications Department.
 - a. The Executive Director will work with the Chair or appropriate Commissioner to determine when the interests of the Commission and use of Commission resources and the interests of a Commissioner have diverged. When the Executive Director determines that such divergence exists, the Commissioner will be informed in a timely manner and may provide a personal statement. The Executive Director will determine if the Commissioner should release the personal statement on their own or if it will be distributed by the Commission. Staff may provide information to media outlets that represents the Commissioner(s)' position.
5. When Commissioners are discussing an issue for which there is no approved Commission policy or communicating in their individual capacity or in a capacity other than as a Commissioner, and there is a reasonable likelihood that their audience may assume or perceive that they are speaking on behalf of the Commission, Commissioners will preface their written or verbal communications with



the following disclaimer (modified as appropriate under the circumstances and to reflect verbal versus written communications):

I am speaking/writing today in my individual capacity and not on behalf of the Commission. All opinions expressed [herein or in my presentation] are strictly my own and do not necessarily reflect the official positions or views of the Commission.

6. Use of the Commission branding is reserved for initiatives that are deemed an agency priority by the Executive Director, in consultation with the Chair and in collaboration with Staff, or approved by an affirmative vote of 3 Commissioners. It is understood that external parties may display the logo to identify participation of particular Commissioners and/or Staff.

Accountability, Checks and Balances

1. As employees, Commissioners and staff are bound by federal and state employment and labor laws, the Commission's governing laws, Commission-approved policies, including the respectful work environment and other elements outlined in the Employee Handbook, and state ethics laws and its Enhanced Code of Ethics.¹⁹
2. Commissioners acknowledge that the Executive Director, as executive and administrative head of the Commission, has obligations to ensure that the Commission is complying with federal and state law and Commission governing laws and approved policies regarding conditions of employment.
3. By state law, Commissioners and staff are required to file disclosures with their respective appointing authorities.
4. If a complaint or allegation is made against a Commissioner and there is a concern that a Commissioner's conduct may be in violation of federal or state law, Commission governing laws, or Commission-approved policies, the Executive Director, General Counsel, and Chief People Officer will conduct an investigation and determine an appropriate course of action in accordance with the Employee Handbook. The Executive Director shall decide on notification of the appointing authority(ies), and will notify the Commissioner, whose conduct is at issue, and the Chair, if not the subject of the complaint.

¹⁹ G. L. c. 10, § 76 (k)



5. If a complaint or allegation is made against the Executive Director, or there is a concern that an Executive Director's conduct may be in violation of federal or state law, Commission governing laws, or Commission-approved policies, that matter will be referred to the Chief People Officer or the General Counsel. The Chief People Officer or General Counsel will conduct an evaluation in consultation with the Chair, and if necessary, will conduct an investigation and determine an appropriate course of action in accordance with the Employee Handbook.
6. If a complaint or allegation is made by or about a member of the Commission Staff or there is a concern that conduct may be in violation of federal or state law, Commission governing laws, or Commission-approved policies, that matter will be referred to the Chief People Officer. The Chief People Officer or delegatee will assess that concern or complaint and report back to the Executive Director. In the event the Chief People Officer and/or the Executive Director is the subject of the complaint, the complaint shall be directed to the General Counsel.

Governance Charter Related Conflict Resolution

Conflicts may arise concerning the interpretation and implementation of this Charter.

1. When there is a lack of clarity in interpreting the Charter or a perceived violation of its terms that are raised by:
 - a. Staff, the issue(s) will be raised through their assigned chain of accountability (Staff->Manager->Director->Chief->ED) until it is discussed with the Executive Director. The Executive Director may choose to discuss the issue with the Chair or with other Commissioners to clarify or resolve the issue(s);
 - b. a Commissioner, then one or two Commissioners may speak with the Executive Director in an effort to clarify the issue(s) and seek resolution; or
 - c. the Executive Director, that issue will be brought to the Chair and/or another Commissioner, to clarify the issue(s) and seek resolution.
2. If additional effort is needed to clarify a Charter element or address a perceived Charter violation, Commissioners and the Executive Director may choose to discuss the issue in a public meeting to reach a shared interpretation of the issue and seek resolution. After deliberations, the Commissioners may put a proposed resolution to a vote.



3. Charter issues addressed through this conflict resolution section of this Charter will be placed on a list of agenda topics to be discussed during the next Charter review. These items will be tracked by the Executive Director or delegee.

Governance Charter Adoption and Review

1. This Charter will be approved by a majority of the Commissioners.
2. The Executive Director has indicated affirmative consent to this charter through signature on behalf of the administrative Staff.
3. The Charter will be reviewed at regular intervals by the Chair and Executive Director.
4. A review of the charter may be initiated by an affirmative vote of 3 Commissioners.
5. Prior to any review, the Chair will obtain input on agenda topics from the Commissioners and the Executive Director will solicit input from Leadership and Staff.

Ratified by the Commission (___ Yea ___ No ___ Abstain) on May __, 2025

Effective this __ day of May 2025.

Travis Ahern
Executive Director



CANNABIS CONTROL COMMISSION - JOB DESCRIPTION		
DIVISION/DEPARTMENT: Investigation & Enforcement		REPORTS TO: Director of Investigations
JOB TITLE: Complaint Resolution Administrator		FLSA: Exempt/Salaried
FT/PT:	ISSUED:	PAY BAND: \$74,241 to \$92,873
JOB PURPOSE/SUMMARY		
<p>The Complaint Resolution Administrator (CRA), reporting to the Director of Investigations (DOI), will be responsible for monitoring and responding to and tracking incoming complaints to the Commission through its established Complaint Resolution Notification Center (CRNC). The overall function of this role is to foster a positive complaint resolution climate for the Commission, by ensuring all complaints are managed equitably, efficiently, and effectively. The CRA is expected to model the highest level of confidentiality and customer service to effectively serve in this role.</p> <p>Various methods of reporting will include email, website, telephone, U.S. Mail, and referrals as reported by Commission staff and Commissioners. The Complaint Resolution Administrator will triage complaints for urgency/emergency, priority, and relevance. The CRA will distribute the complaints in the order of receipt to the appropriate Commission divisions for further follow-up to include investigation if appropriate and in accordance with the Commission's applicable policies and procedures. Additionally, the CRA will support staff with a focus on providing timely responses to Complainants.</p>		
CORE RESPONSIBILITIES		
<ul style="list-style-type: none"> • The primary responsibility of the CRA is to triage complaints and screen referrals lodged through CRNC from Complainants to the appropriate divisions or departments. Complaints will be tracked through the Commission's case management system. • Adopts a universal approach to confidentiality when addressing all complaints, in alignment with Commission confidentiality and all other policy requirements. <ul style="list-style-type: none"> ▪ Establishes an atmosphere of care, concern, and consistency in making determinations as to the proper course of action in these complaints in consultation with the DOI. The CRA will compile information presented during intake and present it to the appropriate divisions to ensure timely responses. ▪ Demonstrates commitment to best practices towards achieving the highest level of customer service. ▪ Works closely with multiple divisions and departments across the Commission to triage, responds to complaints from external constituents, citizens, municipalities, patients, licensees, and others, to understand and respond to reported complaints. ▪ Collaborates with internal management representative of respective departments to ensure complaints are resolved in compliance with applicable Commission regulation and or policies. ▪ Evaluates complaints for immediate or timely response and prioritizes based on the degree of severity and possible impact or harm to the individual, company, and/or the Commission. 		

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. ***This job description is neither a contract for employment nor should it be considered as such.***

- Maintains neutrality when reporting complaints and ensures details are accurately documented and communicated to the appropriate department.
- Engages the legal team in consultation with the DOI on those matters that may require legal review and that may potentially result in future legal actions against the Commission.
- Maintains an accurate record of all complaints through the case management system from complainants including but not limited to phone, email, webforms, U.S. Mail and staff referrals.
- Prepares monthly reports on Commission complaint trends for senior leadership and Executive Director review.
- Refers each complaint to the appropriate departments or divisions for investigation and resolution.
- Provides accurate, valid, and complete information utilizing appropriate methods and tools to support complaint activities.
- Seeks additional information from complainant/reporter in order to appropriately triage if necessary.
- Refers complaints that may involve other regulatory agencies, i.e., OIG, Legislature to the Legal and Government Affairs and Policy teams for review and follow-up if applicable.
- Works with the Director of Investigations and legal team when participating in listening sessions, externally related hearings, or possible litigation actions.
- Helps to develop, update and implement policies and procedures to support the Commission's complaint resolution process.
- Participates in potential media responses with the Director of Investigations and Commission's Comms team regarding complaints processed through the CRC, and provides any relevant, non-confidential information as may be required or appropriate.
- Ability to prioritize tasks and manage high volume workflows.
- Ability to work independently in a fast-paced environment.
- Perform related duties as assigned.

PROFESSIONAL EXPECTATIONS

The Complaint Resolution Administrator must be able to:

- Model and maintain the highest standards of personal, professional, and ethical conduct.
- Support the Commission's goals for a diverse and culturally aware workforce, as well as its commitment to ensuring a diverse and equitable Cannabis industry within the Commonwealth of Massachusetts.
- Consistently apply the principles of an effective complaint process, including but not limited to accessibility, customer service, responsiveness, objectivity and resolution focused.
- Support cross-collaboration across all divisions and departments.
- Demonstrate strong, clear, and respectful communication at all levels and at all times.
- Demonstrate a high level of professionalism and ethical standards in communication and completion of work.
- Remain compliant with all applicable state, federal, and Commission regulatory requirements.

COMPETENCIES, KNOWLEDGE, SKILLS, AND ABILITIES

- Knowledge of the Commission's mission, standards, and goals.
- Demonstrate a deep understanding of the Commission's mission, regulatory responsibilities, and standards.
- Ability to analyze and interpret data to support effective problem-solving and decision-making.
- Demonstrates the ability to resolve complaints and must be able to determine immediate priorities.

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. ***This job description is neither a contract for employment nor should it be considered as such.***

- Demonstrate experience utilizing complaint resolution strategies and effective customer service solutions.
- Understanding of, and commitment to Social Justice and Equity.
- Knowledge of Massachusetts state government, the cannabis regulatory environment, cannabis laws and the cannabis industry.
- Ability to understand and navigate complex complaint issue, while managing dissemination of multiple complaints simultaneously and maintains accurate records.
- Strong verbal and written communication skills, with the ability to listen attentively, gather details, organize information and data, and transcribe into a readable, actionable and easily understood format.
- Ability to build mutual respect, and credible and trustworthy relationships with complainants and other internal and external partners.
- Ability to apply critical thinking when working with multi-tiered complaints.
- Strong computer skills (i.e., Word, Excel) and experience with case management tools/systems.
- Proficiency utilizing various manual and digital applications, metrics, and tools to support reporting requirements, documentation of complaints, and communication of appropriate resolutions.
- Strong organizational and time management skills.
- Ability to prioritize tasks and manage high volume workflows.
- Ability to work independently, as well as with various cross-functional teams, as well as builds trust and rapport, interacts with, and relates to others in a positive manner.
- . Ability to work on multiple assignments; exercise good judgment in decision-making; meet deadlines; demonstrate attention to detail and be flexible.
- Excellent planning and organization skills.
- Ability to seek opportunities to resolve problems, achieve goals, or otherwise advance the Commission's mission.

QUALIFICATIONS AND REQUIREMENTS

- BA/BS Degree in Business or Customer Relations.
- Minimum of 3-5 years complaint resolution experience in government, non-profit, or healthcare desirable; 3-5 years experience in a heavily regulated environment preferred.
- Knowledge of the cannabis regulatory environment preferred.
- Experience working with individuals from diverse cultural and ethnic backgrounds.
- Knowledge of Diversity and Inclusion concept a plus.
- Skilled in organizing tasks, managing timelines, and balancing multiple priorities.
- Proficiency with case management systems, Microsoft Office software suite including Word, Excel, Outlook.
- Familiarity with Microsoft collaboration tools including Teams, Sharepoint, Onedrive.
- Proficiency with complaint resolution and quality customer service required.

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.

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- Standard office environment with exposure to various office temperatures, and equipment use such as computers, fax machines, copiers, etc.

CANNABIS CONTROL COMMISSION'S MISSION STATEMENT AND OPERATING PRINCIPLES

OUR MISSION

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.

OUR 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.

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.

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. ***This job description is neither a contract for employment nor should it be considered as such.***

APPROVALS	
Chief Financial Officer	Date:
Chief People Officer	Date:
Executive Director	Date:
Employee's Supervisor	Date:
Employee's Signature:	Date:

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. ***This job description is neither a contract for employment nor should it be considered as such.***

Guidance on Positive Impact Plans

Revised by the Commission: February 13, 2025

Purpose

The purpose of this guidance is to provide information to assist applicants with the Massachusetts Cannabis Control Commission's (Commission) requirement to submit a plan to positively impact people disproportionately harmed by cannabis prohibition (Positive Impact Plan). This guidance is not legal advice. If you have questions regarding the legal requirements for licensure and renewal in the Commonwealth, you are encouraged to consult an attorney.

Diagram: People Disproportionately Harmed by Cannabis Prohibition



Legal Background and Basis

The Commission is charged by state law to adopt procedures and policies to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by cannabis prohibition and enforcement and to positively impact those communities. M.G.L. c. 94G, § 4.

As part of that mandate, the Commission requires every applicant or licensee to develop a Positive Impact Plan aligned with this objective.

Disproportionately Harmed People

Every applicant or licensee must submit its own Positive Impact Plan to invest in people and communities who have been disproportionately impacted by cannabis prohibition, specifically the six populations defined by the Commission (see diagram on previous page). When this guidance refers to disproportionately harmed people, it refers to these six populations (also listed below).

The first step for the applicant or licensee is to decide who the plan is intended to benefit, so that the plan is tailored to the goals, programs, and measurements of that specific group. **The six identified populations of disproportionately harmed people that the Positive Impact Plan should be tailored to are the following:**

1. Past or present residents of the geographic “disproportionately impacted areas,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact. Note that some disproportionately impacted geographic locations are cities or towns, and others are neighborhoods identified by census tracts. The designation of these areas will be re-evaluated periodically.
2. Commission-designated Certified Economic Empowerment Priority recipients;
3. Commission-designated Social Equity Program participants;
4. Commission-designated Social Equity Businesses;
5. Massachusetts residents who have past drug convictions; and
6. Massachusetts residents with parents or spouses who have drug convictions.

Applicants are required to demonstrate a minimum of two goals relating to the groups identified above.

Elements of a Plan

As part of an extensive review of application materials, the Commission will assess the Positive Impact Plan to make sure it includes the following:

1. **Goals:** the desired outcomes of the plan;
2. **Programs:** detailed actions, activities, or processes that will be utilized or implemented to achieve the outlined goals; and

3. **Measurements:** specific metrics that will be implemented to assess the progress and success of the program.

Each plan should follow this format to comply with the Commission's regulations. See 935 CMR 500.101(1). Miscellaneous, extraneous, or additional information unrelated to the goals, programs, and measurements of each plan is not necessary and should not be included in the submission. Applicants and Licensees may opt to publish their Positive Impact Plan on their business website.

The following sections will provide guidance on expectations, examples, and additional state requirements that should be included in the licensee's Positive Impact Plan. The examples provided below are not an exhaustive list and applicants are encouraged to be innovative while remaining compliant with the Commission's regulations and any other applicable laws.

Goals

Each applicant or licensee must establish specific goals that will make a positive impact on one or more of the six groups of people as identified above. Each plan must clearly list and describe these goals. Applicants and licensees are encouraged to develop their own goals, especially by considering input from the disproportionately harmed people and/or communities that the plan is intended to impact.

Equity-focused goals are intentional, measurable commitments designed to address systemic barriers and create meaningful opportunities for individuals and communities disproportionately impacted by cannabis prohibition and enforcement. These goals should advance economic empowerment, increase access to industry participation, and promote sustainable, long-term benefits for historically marginalized groups. By centering equity in business practices, applicants and licensees can foster inclusive growth, support workforce development, and contribute to broader efforts aimed at correcting past injustices. Effective equity-focused goals are data-driven, actionable, and responsive to the specific needs of the communities they are intended to uplift.

Some examples of equity-focused goals include, but are not limited to, the following:

1. Reducing barriers to entry in the commercial adult-use cannabis industry for disproportionately harmed people (specifically list which barriers the plan intends to reduce);
2. Providing mentoring, professional, and technical services for disproportionately harmed people (specifically list the services the plan will offer);
3. Providing business assets or other benefits for disproportionately harmed people (specifically list the benefits the plan will provide); or
4. Donating to the Cannabis Social Equity Trust Fund that is administered by the Executive Office of Economic Development (EOED), per 935 CMR 500.101 (1) (a)11.

Programs

Each applicant or licensee should develop specific programs to accomplish its stated goals to positively impact disproportionately harmed people and clearly describe the proposed programs in the plan. Please be as specific as possible. Applicants and licensees are discouraged from creating plans that consist solely of donation-based activities.

You should develop and individualize your own programs to reach your goals. Some examples of programs are listed and described below. To prioritize the sentiment, reflections, and perspectives of the people most affected by cannabis prohibition and enforcement, the first four program examples below are those most commonly identified by recent Social Equity Program Participants as activities that cannabis businesses should initiate or fund, in the order they were preferred.

Providing grant funding or providing low-interest loans

This could be accomplished by providing debt and/or equity funding to help businesses founded by disproportionately harmed people, who have limited net worth and access to traditional sources of capital, meet start-up and working capital needs. This funding may take the form of investment vehicles including, but not limited to: standard debt instruments; convertible debt instruments; or equity investment pools with other enterprises.

Donating to the Cannabis Social Equity Trust Fund

Applicants and licensees may satisfy their Positive Impact Plan requirement, in part, by donating to the Cannabis Social Equity Trust Fund at any time once licensed. For more information and logistics on how to complete donations please contact EOED or visit the Cannabis Social Equity Trust Fund [webpage](#).

Creating accelerator or incubator programs

Applicants and licensees could consider launching or supporting accelerator or incubator programs for disproportionately harmed communities. Such programs could provide grants; access and introductions to potential sources of capital; cultivation, manufacturing, or retail space; management training or other forms of industry-specific technical training; mentorship from experts; formation of peer support groups; and other benefits that comply with the Commission's regulations with respect to limitations on ownership and control.

Providing educational sessions and record sealing/expungement services

Collaborations with an educational institution, such as a community college, could provide knowledge and information about the cannabis industry and practical skills relevant to the industry to disproportionately harmed people. Educational events with nonprofit organizations could also make a positive impact. For both types of education, applicants and licensees should document how the programs benefit disproportionately harmed people specifically. Often, educational sessions include a record sealing or expungement component as an additional

benefit.

Creating jobs

Applicants or licensees may create equitable jobs by giving hiring preferences to disproportionately harmed people. If they choose to implement this type of program, they must affirmatively identify the specific disproportionately impacted people or groups, how to reach them, and how to track progress on an ongoing basis. If data shows that the plan is not succeeding in creating jobs for the group(s) identified, the approach should be adjusted to align with this goal.

Funding charitable efforts

Providing assistance to named nonprofits and charities whose mission(s) benefit disproportionately harmed people can also make a positive impact. Applicants and licensees should include the name and mission of a listed nonprofit or charity in the plan and how it will ensure that contributions specifically benefit disproportionately harmed people. Note that if the applicant or licensee intends to make monetary donations to nonprofits or charities, it must obtain written correspondence certifying that the nonprofit or charity will accept the donation prior to including it as a component of your plan.

Measurements

Each applicant or licensee must disclose the specific measurement metrics that will be used in measuring the success of its programs. This is important because upon renewal, the licensee will be required to report, at a minimum, detailed, demonstrative, and quantifiable proof of the establishment's efforts, progress, and success of approved plans.

Therefore, this section of the plan should include both qualitative and quantitative measures (metrics) that demonstrate the progress or success of the plan. Metrics should have an identified data source and method for tracking that data.

The applicant is responsible for disclosing and tracking the intended measurement metrics.

Depending on the stated goals and programs, measurement metrics will vary. Applicants and licensees should design metrics as a practical way to measure progress toward the goals set in the plan. Some examples of metrics that could be utilized include, but are not limited to, the following:

1. Number of employees hired, retained, or promoted that come from disproportionately impacted areas or one of the other groups of people previously identified in this guidance;
2. Number and subject matter of trainings offered and performed, with documentation of attendance by people from disproportionately harmed communities;
3. Number of records sealed or expunged;
4. Number of records= expungement/sealing clinics conducted;

5. Specific financial data and/or employee hours showing donations to or investments in specific causes that benefit disproportionately harmed people;
6. Number of businesses owned by disproportionately harmed people that obtained training or assistance from the programs, along with the businesses' assessment of the programs; or
7. Number of businesses or people participating in and successfully paired with the employer through the Commission's Social Equity Program.

Adding Certain Goals Directly into the Application

The Commission has designed the license application so that all applicants and licensees are able to enter certain quantifiable goals directly into their plan. These items do not replace the plan for the establishment but can be included if the establishment intends to set certain hiring or donation goals. The following questions will be asked of all applicants and licensees during the initial application process or annually at renewal. The answers provided within the initial application for licensure will be copied into the renewal application for ease of reporting metrics.

1. If your proposed plan has a goal of donating monies to areas of disproportionate impact, as defined by the Commission, please enter the dollar amount, if not, enter 0.
2. If your proposed plan has a goal of donating monies to the Cannabis Social Equity Trust Fund, please enter the dollar amount, if not, enter 0.
3. If your proposed plan has a goal of hiring individuals that have been disproportionately impacted, as defined by the Commission, please enter the percentage goal for hiring; if not, enter 0.

Additional Requirements Pertaining to Positive Impact Plans

In addition to those requirements stated above, the Positive Impact Plan requires the applicant to affirmatively state the following:

1. The applicant acknowledges, is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every licensee; and
2. Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Tips for Designing Your Positive Impact Plan

When drafting the plan, every applicant should be mindful of the following information:

1. The Positive Impact Plan is a distinct application requirement. The Positive Impact Plan deals with benefiting areas of disproportionate impact and/or disproportionately harmed people as defined in this guidance. The plan should positively impact one or more of the six identified populations. If it is geographically or otherwise impractical for your business to reach geographic areas of disproportionate impact, consider a plan that focuses on the other

four specified groups.

2. You should endeavor to disclose only the information necessary to comply with the requirements of the plan. This plan should be no longer than three pages. You may include appendices; however, this is discouraged, excluding support letters for nonprofits accepting monetary donations.
3. Progress on this plan will be evaluated upon license renewal. Please ensure that the plan you submit as part of the application is practical and that you plan to implement and achieve success in the programs you list. We recommend instituting a process to evaluate the progress of your plan quarterly in preparation for demonstrating success upon renewal. Upon license renewal, the Commission shall evaluate any information deemed necessary to assess the bona fide progress of each plan.
4. This revised guidance should be utilized immediately. For compliance purposes, Commission staff will begin reviewing all applications not previously reviewed in accordance with this document upon approval by the Commission.

Reporting Progress and Success of the Positive Impact Plan at Renewal

All licensees are required to provide a report of the progress and success of the Positive Impact Plan annually at renewal.

Licensees should upload a summary document with supporting documentation (in a single PDF) demonstrating the establishment's progress or success in complying with each of the goals in its currently approved Positive Impact Plan. Supporting documentation could include the following:

1. Data analysis of current employees that have been disproportionately impacted, as defined by the Commission;
2. Letters from organizations which the establishment has donated to, acknowledging receipt of monies and/or time donated; and/or
3. Any other relevant evidence of progress or success.

The information/documentation provided within the renewal application demonstrating the progress or success of the plan should be specific to the current renewal period only and must reflect the licensee's currently approved Positive Impact Plan. If the plan which has been attached to the application is not the correct plan for the current renewal period, the correct plan should be uploaded into the application. If no progress has been made, a detailed explanation of the reason should be provided by the licensee.

If the licensee has included answers to the questions as provided in the application, these answers will be copied over to the renewal application, each renewal period.

While the licensee may upload a new or modified Positive Impact Plan for the upcoming year of licensure, any previously approved plan should not be removed. If a new or modified plan is submitted for future implementation by the establishment, the plan will be evaluated for compliance with the Commission's current regulatory requirements and may be subject to requests for information by the Commission. Submission of new or amended plans, or

documentation towards goals not previously disclosed to the Commission, may delay the recommendation of an application for licensure or renewal.

Questions?

If you have additional questions regarding Positive Impact Plans, please contact the Commission at Licensing@CCCMass.com or (774) 415-0200.



COMMONWEALTH OF MASSACHUSETTS

Guidance on Equity Programs

May 2025

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Purpose of This Guidance

The purpose of this guidance is to provide stakeholders and program participants with a clear understanding of the Cannabis Control Commission's (Commission) equity-driven initiatives and the benefits available to promote economic opportunity in Massachusetts' regulated cannabis industry.

These benefits are intentionally designed to reduce systemic barriers, foster industry participation, and create sustainable pathways for individuals and businesses historically impacted by cannabis prohibition.

Specifically, this guidance outlines support for:

- Individuals from communities disproportionately harmed by cannabis prohibition, who have faced the long-term social, economic, and legal consequences of enforcement policies, through participation in the Social Equity Program (SEP). This program provides education, training, and technical assistance to facilitate entry and success in the cannabis industry.
- Businesses committed to economic empowerment, recognized as Certified Economic Empowerment Priority Applicants (EEAs) or Licensees, who have demonstrated a commitment to benefiting communities disproportionately affected by cannabis prohibition and enforcement.
- Diverse-owned businesses, including Minority-Owned (MBE), Women-Owned (WBE), and Veteran-Owned (VBE) Businesses, certified by the Massachusetts Supplier Diversity Office (SDO) as Disadvantaged Business Enterprises (DBEs).
- Social Equity Businesses (SEBs), which are subject to a verification process:
 - Pre-Verified SEBs – Businesses that are not yet licensed but have at least 51% ownership by individuals who meet SEP eligibility criteria.
 - Verified SEBs – Licensed businesses that maintain the same 51% equity-qualified ownership and eligibility standards.

By equipping stakeholders with this information, the Commission reaffirms its commitment to ensuring equitable access, increasing economic mobility, and fostering a cannabis industry that reflects and benefits the diverse communities of Massachusetts.

More programming information is available here: <https://masscannabiscontrol.com/equity/>.

These benefits currently apply only to applicants and licensees who are seeking licensure as Marijuana Establishments in the adult-use cannabis industry. This guidance is provided for informational purposes only and does not constitute legal advice. For specific legal concerns related to these programs, individuals should consult an attorney.

To stay informed on updates, [sign up](#) for the Commission's general and SEP notification lists.



Section 1. Equity Programs Overview

Social Equity Program

The [SEP](#) is a free, statewide, technical assistance and training program that provides education, skill-based training, tools, and exclusive licensing benefits for success in the cannabis industry for those most impacted by the War on Drugs, marijuana prohibition, and disproportionate arrests and incarceration. The program, which is not a license or license type, is designed to give participants the tools and training necessary to apply for and obtain a license if that is their goal for the industry, and/or the skills-based training for employment. Acceptance into the SEP does not guarantee licensure. The program stems from the legislative requirement for the Commission to ensure that people from communities that have been disproportionately harmed by marijuana law enforcement can benefit from the legal marijuana industry, under [St. 2017, c.55](#).

Certified Economic Empowerment Priority Applicants

In addition to the statutory requirement to include individuals from disproportionately harmed communities, St. 2017, c. 55 mandated the Cannabis Control Commission to prioritize the review and licensing of applicants seeking retail, manufacturing, or cultivation licenses who could demonstrate experience in—or business practices that promote—economic empowerment in disproportionately impacted communities.

To fulfill this requirement, the law directed the Commission to identify and process all priority applications submitted between April 1, 2018, and April 15, 2018, before reviewing any other license applications. In response, the Commission established a certification process for eligible applicants within this window, formally designating them as Economic Empowerment Priority Applicants (EEAs). Beyond the required priority review, the Commission has voluntarily extended additional benefits to certified EEAs, reinforcing its commitment to fostering equitable industry participation.

Minority-Owned, Women-Owned, Veteran-Owned Businesses

Under St. 2017, c. 55, the Commission is also tasked with tracking and actively promoting the meaningful participation of minority-owned, women-owned, and veteran-owned businesses in the regulated cannabis industry. Businesses certified as Minority-Owned (MBE), Women-Owned (WBE), or Veteran-Owned (VBE) by the Massachusetts SDO qualify for expedited licensing review, further supporting equitable access to business opportunities within the industry.

For more information on licensing, priority review, and expedited review, please consult the Commission's [Guidance on Licensure](#).



Social Equity Business Status

The SEB Status Verification process ensures that businesses meet the qualifications for Pre-Verified or Verified SEB status. A Pre-Verified SEB meets the 51% ownership requirement under the SEP but has not yet obtained a license. A Verified SEB has either received a provisional or final license or has begun operations. This verification process helps confirm that businesses remain eligible for equity-focused benefits and support.

Section 2: How to Apply and Maintain Eligibility

Social Equity Program

The SEP is designed to empower individuals and communities disproportionately affected by the War on Drugs and marijuana prohibition, particularly those who have faced higher rates of arrest and incarceration. The program provides education, training, and industry access across four key pathways: entrepreneurship, entry-level workforce development, managerial-level workforce development, and ancillary business support. These targeted areas help participants align their skills, experience, and career aspirations with opportunities in the regulated cannabis industry, fostering long-term success and equitable representation.

Eligibility Criteria

To qualify for the SEP, applicants must meet at least one of the following criteria:

- The applicant's income does not exceed 400% of the Area Median Income, and they have lived in a [Disproportionately Impacted Area \(DIA\)](#), as identified by the Commission, for at least five of the last 10 years.
- The applicant has been a Massachusetts resident for at least the past 12 months and has a conviction or continuance without a finding for a G.L. c. 94C offense (drug-related offense), or an equivalent conviction in another jurisdiction.
- The applicant has been a Massachusetts resident for at least the past 12 months and is the spouse or child of someone with a conviction or continuance without a finding for a G.L. c. 94C offense, or an equivalent conviction in another jurisdiction.
- Any individual listed as an owner on the original certification of an EEA application who meets one or more of the following criteria:
 - Lived for five of the preceding 10 years in a DIA, as defined by the Commission;
 - Has work experience in roles where the primary population served was disproportionately impacted, or where responsibilities included economic education, resource provision, or empowerment for those communities;



- Is of Black, African American, Hispanic, or Latino descent; or
- Can demonstrate a significant past experience or business practices that promote economic empowerment in a DIA.

The SEP application is made available online through the [Massachusetts Cannabis Industry Portal \(MassCIP\)](#) during designated application periods when the Commission is accepting submissions for review.

The Commission remains committed to keeping stakeholders informed by sharing updates and key information through multiple channels. These include the [Commission's website](#), [Equity Programs](#) webpage, [FAQ](#) webpage, and official social media platforms ([Facebook](#), [LinkedIn](#), [Instagram](#), [X](#), and [YouTube](#)). Additionally, updates are communicated via equity-focused newsletters, public announcements during monthly Commission meetings, and [TalentLMS](#), the Commission's online portal for training and technical assistance, ensuring SEP participants have continuous access to relevant resources.

To stay informed about application deadlines for future cohorts, individuals can subscribe to the [SEP Email List](#), attend [Commission](#) Public Meetings, and follow the Commission on social media.

Certified Economic Empowerment Priority Applicants

As mandated by Massachusetts law, EEA certification was a one-time, legislatively required designation designed to promote equitable participation in the regulated cannabis industry. The application period was open from April 1, 2018, through April 15, 2018, during which the Commission identified and certified eligible applicants. The Commission is no longer accepting applications for EEA certification, and no additional designations will be granted.

Applicants were certified as EEAs if the individual or group of individuals applying met three of the following six criteria:

- 1.)** Majority of ownership belongs to people who have lived in DIAs for five of the last 10 years;
1. Majority of ownership has held one or more previous positions where the primary population served was disproportionately impacted, or where primary responsibilities included economic education, resource provision, or empowerment to disproportionately impacted individuals or communities;
2. A majority of the ownership is made up of individuals from Black, African American, Hispanic, or Latino descent;
3. At least 51% of current employees/sub-contractors reside in DIAs and will increase to 75% by the first day of business;



4. At least 51% of employees or sub-contractors have drug-related CORI, but are otherwise legally employable in a cannabis-related enterprise;
5. Owners can demonstrate significant past experience in business practices that promote economic empowerment in DIAs.

To remain eligible for priority review and any other benefits based on EEA status, the individual or group of individuals must have more than 50% of the ownership and control of a license. If the control and ownership qualifications are no longer met, the applicant or licensee is no longer eligible for EEA-related benefits. Changes in ownership or control relative to Economic Empowerment Priority Review are governed by [935 Code Mass. Regs. §500.104\(1\)\(b\)\(3\)](#), which states:

Where a certified EEA seeks approval by the Commission of a change in ownership or control, the applicant must undergo the approval process provided by 935 Code Mass. Regs. § 500.104 prior to making a change in ownership or control.

1. To maintain its status as an EEA, the applicant in its submission must demonstrate that it continues to qualify as an EEA, as defined in 935 Code Mass. Regs. § 500.002.
2. On receipt of notice and a request for approval under 935 Code Mass. Regs. § 500.104, the Commission shall review again the applicant's eligibility for economic empowerment certification status.
3. If the qualifications are no longer met after the approved change, the applicant will no longer receive any benefits stemming from that designation.
4. The applicant may still seek approval for a change of ownership or control.

Minority-Owned, Woman-Owned, and Veteran-Owned Businesses

Benefits for MBEs, WBEs, and VBEs are based on certification by the Massachusetts SDO. The MBE, WBE, and/or VBE must disclose this designation in their license application and either (1) be certified as that specific type of business with the SDO or (2) sign up for the SDO's required business class and complete and upload the [Expedited Review Affidavit](#) into their license application. Certification as MBE, WBE, and/or VBE by the SDO will be required before obtaining a final license.

More information about obtaining certification from the SDO can be found [here](#).

As stated in 935 Code Mass. Regs. §500.005(1)(c) and in the Commission's [Guidance on Licensure](#), businesses with an MBE/WBE/VBE status also need to fulfill the Commission's definition of a small business and submit an attestation with their licensing application to receive Commission benefits as outlined in section IV. [Benefits of Equity Programs](#).



Small Business means, for the purposes of 935 Code Mass. Regs. § 500.005(1)(b), an applicant or Licensee that:

- (a) currently employs a combined total of 50 or fewer full-time equivalent employees in all locations or employees work less than a combined total of 2,600 hours per quarter; and
- (b) has gross revenues of \$5 million or less, as reported to the Massachusetts Department of Revenue the year prior to the date of the Licensee's renewal application or as otherwise demonstrated in a form and manner determined by the Commission.

Social Equity Business Status

SEBs are licensed or pre-licensed Marijuana Establishments as defined in [Section 1 of Chapter 94G](#) and are subject to a rigorous verification process to ensure compliance with equity-focused ownership criteria.

- **Pre-Verified SEB:** This designation applies to businesses that are not yet licensed but have at least 51% ownership by individuals and/or entities that meet the Commission's SEP eligibility criteria.
- **Verified SEB:** This designation applies to licensed businesses that maintain the same 51% equity-qualified ownership and eligibility standards.

These designations serve to promote equitable participation in the regulated cannabis industry, ensuring that businesses led by those disproportionately impacted by cannabis prohibition can access financial, and operational support to foster long-term success.

Applications for SEB pre-verification and verification are available on [MassCIP](#).

Please Note: A *Verified* SEB must be a licensed Marijuana Establishment with at least a Provisional License.

Social Equity Business Eligibility

To be pre-verified or verified as an SEB, applicants must meet at least **one** of the following eligibility criteria defined by the SEP.

Criteria One:

Income that does not exceed [400% of Area Median Income](#) and residency in a DIA, as defined by the Commission, for at least five of the past 10 years.

Explanation of Income and Residency:

- **Income:** Your household income does not exceed 400% of the Area Median Income.



- Residency: You have resided in a DIA, as defined by the Commission, for at least five of the past 10 years.

Criteria Two:

Residency in Massachusetts for at least the past 12 months and a conviction or continuance without a finding for an offense under M.G.L. c. 94C or an equivalent conviction in Other Jurisdictions.

Explanation of Residency and Conviction:

- Residency: You have been a resident of Massachusetts for at least the past 12 months.
- Conviction: You have a conviction or continuance without a finding for an offense under M.G.L. c. 94C or an equivalent conviction in other jurisdictions.

Criteria Three:

Residency in Massachusetts for at least the past 12 months and the applicant must be the child of or spouse of an individual with a conviction or continuance without a finding for an offense under M.G.L. c. 94C or an equivalent conviction in Other Jurisdictions.

Explanation of Residency and Family Conviction:

- Residency: You have been a resident of Massachusetts for at least the past 12 months.
- Family Conviction: You can provide proof that you were or are currently married to or the child of an individual with a conviction or continuance without a finding for an M.G.L. c. 94C offense or an equivalent conviction in other jurisdictions.

Section 3: Benefits of Equity Programs

The benefits available to individuals will vary based on their specific equity status. To see the benefits for each equity status, find the corresponding icon in the key below and match it with the listed benefits.

Equity Status Key:

- ♣ SEP Participants with greater than 50% ownership or control of a license
- ♦ SEP Participants with less than 50% ownership or control of a license
- ♥ SEB (Pre-Verified/Verified)
- EEA with greater than 50% ownership or control of a license
- △ MBE/ WBE /VBE pending SDO certification



♠ MBE/ WBE/ VBE with SDO certification that meets the Commission’s definition of a Small Business

Benefits Overview:

1.) Waived application fees for license applications ♣ ■ ♠

Those meeting the qualifications will have their application fees on their provisional license waived. Waived application fees do not include the costs associated with background checks. In addition, once the application is reviewed, if the equity status criteria for this benefit is not met, the business will not receive this benefit and will need to pay the application fee in full.

2.) 50% reduction in annual license fees ♣ ■ ♠

Those meeting the qualifications will receive a 50% reduction in annual fees regardless of license type. When the application is reviewed, if the qualifier for this benefit is not continuously met, the business will not receive this benefit and must pay the full annual renewal fee.

3.) Waived monthly Metrc program fees ♣ ■ ♠

Those meeting the qualifications will have their monthly Metrc program fees waived. However, once the application is reviewed, if the qualifier for this benefit is not met, the business will not receive this benefit and must pay the monthly Metrc program fees. Please note the waived program fees do not include additional costs associated with Metrc, including plant and packaging tags.

4.) License Type Exclusivity ♣ ■

Delivery Endorsements for Microbusinesses and Delivery Licenses will be limited exclusively to businesses controlled by and with majority ownership comprised of EEA or SEP Participants. The initial delivery exclusivity period of three years was set to end on April 1, 2025. However, on Thursday, March 13, 2025, the Commission voted to extend the exclusivity period by one year with the goal of assessing the need for further extension by April 1, 2026. The Commission may vote to extend that period if the goal of the exclusivity period – to promote and encourage full participation in the regulated marijuana industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement of the law – has not been met. This provision will also include Social Consumption Licenses when they become available. For more information about these exclusivity provisions, see [935 Code Mass. Regs. § 500.050\(10\)\(b\)](#).



5.) Priority review ■

EEAs who continue to meet the required criteria have priority status for their license applications. The Commission reviews applicants with priority review status before any other applications. More information is available in the “Order of Review” section of the Commission’s [Guidance on Licensure](#).

6.) Expedited review ♣ ♦ ♠ ♥ △

After priority applicants, the Commission reviews expedited applications by the date and time the application was fully submitted. Expedited applications are those submitted by SEP participants, Pre-Verified and Verified SEBs and MBEs, WBEs, and VBEs, along with Microbusiness applicants, Craft Marijuana Cooperative applicants, Independent Testing Laboratory applicants, and Outdoor Cultivator Applicants. More information is available in the “Order of Review” section of the Commission’s [Guidance on Licensure](#).

7.) Designation as beneficiaries of Positive Impact Plans ♣ ♦ ♥ ■

Every Marijuana Establishment licensee or license applicant must submit a plan to positively impact people and communities disproportionately harmed by cannabis prohibition, along with goals, programs, and measurements that must be tracked and submitted to the Commission upon renewal. EEAs, SEP participants, and SEBs are specifically designated among the intended beneficiaries of these plans. For more information about these plans, see the Commission’s [Guidance on Plans to Positively Impact Disproportionately Harmed People](#).

8.) Training and Technical Assistance ♣ ♦

The SEP provides comprehensive professional training and technical assistance to participants through carefully selected vendors, chosen via a state procurement process. Vendors are evaluated based on curriculum framework, expertise in serving disproportionately impacted communities (including minorities, veterans, women, and farmers), digital content development capabilities, deliverable timelines, and budget considerations. The Commission establishes master agreements with selected vendors to ensure high-quality training and support.

Since the first SEP cohort completed its live training and technical assistance in April 2020, the program has expanded to include three additional cohorts, with over 1,000 participants accepted to date. To support ongoing learning, the SEP continuously updates its technical assistance materials in TalentLMS, the Commission’s online learning portal, ensuring participants have access to relevant and evolving industry knowledge.

To access the SEP’s training and technical assistance, participants must maintain formal SEP designation based on eligibility criteria. For more information on eligibility requirements, program



tracks, or available resources, please visit our [Equity webpage](#) or contact the Commission's Equity Programming and Community Outreach Department at Equity@CCCMass.com.

9.) Eligibility to Apply to the Cannabis Social Equity Trust Fund ♣ ♦ ♥ ■








































The [Cannabis Social Equity Trust Fund](#) was established under [Section 14A of M.G.L. c. 94G](#) to advance economic empowerment and equitable participation in the regulated cannabis industry. This fund was created to provide critical financial support to entrepreneurs and businesses from communities disproportionately harmed by cannabis prohibition and enforcement, helping to remove barriers to entry and promote long-term industry success. Administered by the Executive Office of Economic Development (EOED), the fund is exclusively available to individuals and businesses that maintain the SEP, EEA, or SEB status with the Commission. To learn more about eligibility requirements and available funding opportunities, visit EOED's [Cannabis Social Equity Trust Fund webpage](#).

10.) Shortened Municipality Response Time ♣ ♦ ♥ ♠ ■ △

All equity participants receive additional municipal benefits because of their status. This includes an expedited review time for EEA and priority review time for SEPs, SEBs, MBEs, WBEs, and VBEs on their marijuana application. Specifically, municipalities have 30 days to finish their application review for SEBs and businesses controlled by and with majority ownership comprised of EEAs or SEPs. Equity participants also benefit from the opportunity to receive one of the additional Host Community Agreements (HCAs) if the Host Community elects to increase existing cap limits.

To stay informed about benefits offered by the Commission's equity programs and participate in future discussions, sign up for the Commission's general notification list and SEP notification [here](#).



						
	SEP Participant(s) with greater than 50% ownership or control of a license	SEP Participant(s) with less than 50% ownership or control of a license	SEB (Pre-Verified/ Verified)	EEA with 50% ownership or control of a license	MBE/ WBE /VBE pending SDO certification	Certified MBE/ WBE/ VBE from SDO and meets the Commission's definition of Small Business
Waived application fees for license applications						
50% reduction in annual license fees						
Waived Monthly Metrc Program Fees						
License Type Exclusivity						
Priority Review						
Expedited Review						
Designation as beneficiaries of Positive Impact Plans						
Training and Technical Assistance						
Eligibility to Apply to the Social Equity Trust Fund						
Shortened Municipality Response Time						



Section 4: Equity Research and Data

The Cannabis Control Commission is committed to advancing equity through [rigorous research](#) and Commission-collected data (i.e., Industry, Agent, Seed-to-sale tracking, and other modes of data collection) transparency, as mandated by the Massachusetts Legislature pursuant to M.G.L 94G Section 17, including M.G.L 94G Section 17(a)(iv) “*ownership and employment trends in the marijuana industry examining participation by racial, ethnic and socioeconomic subgroups, including identification of barriers to participation in the industry.*”

From April 2019 to February 2025, the Commission’s Research Department has continuously published on issues of social equity in the cannabis industry, including the following Legislative Reports, Special Reports, and Scientific Manuscripts:

- 1.) [Review and Assessment of the Massachusetts Adult- and Medical-use Cannabis Industries](#) (February 2025)
- 2.) [A Research Agenda to Inform Cannabis Regulation: How Science Can Share Policy](#) (June 2023)
- 3.) [Racial Equity in Cannabis Policy: Diversity in the Massachusetts Adult-Use Industry at 18-months](#) (December 2022)
- 4.) [Cannabis Use Trends in Massachusetts: Findings from the International Cannabis Policy Study, 2019 and 2020](#) (July 2022)
- 5.) [A Scoping Review of Data Sources for the Conduct of Policy-Relevant Substance Use Research](#) (September 2021)
- 6.) [Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts](#) (March 2021)
- 7.) [Discussion of the National Incident-Based Reporting System’s \(NIBRS\) Potential to Assess and Monitor Cannabis Incident Disparities: Response to Drs. McCormack and Walfield](#) (February 2021)
- 8.) [Using National Incident Based Reporting System \(NIBRS\) to Examine Racial and Ethnic Disparities in Cannabis Violations](#) (September 2020)
- 9.) [A Baseline Review and Assessment of the Massachusetts Adult-Use Cannabis Industry: Market Data and Industry Participation](#) (February 2020)



- 10.) [A Baseline Review and Assessment of the Massachusetts Cannabis Industry's Required Positive Impact Plans](#) (October 2019)
- 11.) [A Baseline Review and Assessment of Cannabis Use and Public Safety Part 2: 94C Violations and Social Equity: Literature Review and Preliminary Data in Massachusetts](#) (April 2019)

Additionally, stakeholders can access the latest insights on SEP participants, EEAs, SEBs, as well as MBEs, WBEs, VBEs, LGBTQ+-Owned, and Disability-Owned businesses. This data is regularly updated and available on the Commission's [Public Documents](#) page and [Public Meetings](#) subpage, where recent public meeting presentation files provide the most current analysis of industry participation trends.

Questions?

For any additional questions regarding this Guidance on Equity Programs, please contact the Commission at (774) 415-0200 or Equity@CCCMass.Com.





Cannabis Control Commission

Public Meeting

May 22, 2025 at 10:00 am

Remote via Microsoft Teams



Agenda

1. Call to Order
2. Commissioner Comments and Updates
3. Staff Recommendations on Changes of Ownership
4. Staff Recommendations on Renewal Licenses
5. Staff Recommendations on Final Licenses
6. Hearing Officer Recommended Decision
7. Request for Equitable Relief
8. Commission Discussion and Votes
9. New Business Not Anticipated at Time of Posting
10. Next Meeting Date
11. Adjournment



Staff Recommendations: Changes of Ownership

Staff Recommendations: Changes of Ownership

1. Castleleaf, LLC





Staff Recommendations: Licensing Renewals

Staff Recommendations: Renewals

1. 253 Organic, LLC (#MRR207204)
2. Assured Testing Laboratories LLC (#ILR267947)
3. Blossom Flower, LLC (#MPR244324)
4. Chill & Bliss II, LLC (#MRR207228)
5. Green Gold Group, INC (#MRR207245)
6. Greenfield Greenery LLC (#MCR140915)
7. Hidden Wonders, LLC (#MRR207217)
8. Holland Brands SB, LLC (#MRR207159)
9. Nova Farms, LLC (#MRR207173)
10. Nova Farms, LLC (#MCR140909)
11. Tempest, Inc (#MRR207097)
12. The Corner Emporium LLC. (#DOR5182979)
13. VanGarden Cannabis, LLC (#MPR244287)
14. VanGarden Cannabis, LLC (#MCR140884)
15. ARL Healthcare, Inc. (#RMD1085)
16. OCS Green Leaves, LLC (#RMD1706)





Staff Recommendations: Final Licensure

Staff Recommendations: Final Licenses

1. Hidden Wonders, LLC (#MR285040)
2. Native Sun Wellness, Inc. (#MTC4128)





Hearing Officer Recommended Decision

Hearing Officer Recommended Decision

1. Nature's Alternative, Inc.





Request for Equitable Relief

Request for Equitable Relief

1. Deerfield Naturals, Inc.





Commission Discussion & Votes

Commission Discussion and Votes

1. Draft Governance Charter



Executive Director – Governance Charter Review

- **ED Review Process:**

- Reviewed previous draft during onboarding with current staff and Commissioners
- Reviewed with those involved in development of draft document (mediator, former staff and Commissioners)
- Reviewed related SOPs, practices (past and present)

- **ED Approach to Suggested Edits:**

- Aimed to “streamline” document with overarching goal of explaining how the current Commissioner-ED Structure can work most efficiently and effectively
- ED recommended changes focus on a “guardrails” approach to Governance Charter, while cross-referencing some items with Standard Operating Procedures (SOPs);
 - *Where appropriate, items that were referenced in existing SOPs or required SOP updates were moved to a separate tracking document*
 - *Where appropriate, certain sections were combined under one bullet point*
- Numerous opportunities still exist for uniformity in definitions



Executive Director – Governance Charter Review

Moved to Separate Tracking for Updating/Creating Policies/SOPs:

- **Public Meeting Agenda Setting**
 - *Standard practice under OML, not specific to CCC*
- **Executive Director Goals**
 - *Standard role of public body tasked with hiring/managing Executive Director position*
- **Project Work Groups**
 - *Case specific and management of non-Commissioner staff is through the Executive Director, therefore handled within the Roles and Responsibilities Section*
- **Budgeting & Budgeting Process**
 - *Budgeting role of Commissioners in statute, annual budgeting process SOPs cover previous draft language*
- **Professional Development**
 - *Previous version states standard employer functions for professional development, and required OML training; Policies & SOPs demonstrate commitment to professional development*

Executive Director – Governance Charter Review

Updated Version for Review – Summary of Content & Changes

- **Roles & Responsibilities**

1. Commissioners, including the Chair
2. The Commission Chair
3. The Commission Treasurer
4. The Commission Secretary
5. The Executive Director

- **Interactions Between/Among Commissioners, Executive Director, and Staff**

- Ensuring that policy makers (Commissioners) have access to necessary staff/information
 - Ensuring that Commissioners go through ED as Administrative Head of Agency for access to staff
 - Ensuring that MGL 30A requirements are upheld regarding disclosure of investigatory information

Executive Director – Governance Charter Review

- **External Affairs**

- Commissioners as Spokespersons – covering various scenarios:
 - When speaking on behalf of the Commission
 - When speaking in one's individual capacity
- Executive Director as Spokesperson
 - De facto spokesperson for administrative, personnel, and operational matters

- **Accountability, Checks and Balances**

- Standard internal complaints follow a standard HR process of review
- Complaints or allegations featuring specific personnel (including the ED) or Commissioners, must follow a slightly different process given the chain of command structure, which are laid out
- Matrix

Executive Director – Governance Charter Review

- **Final Thoughts:**

- The updated Governance Charter (with Executive Director recommended changes) narrows its focus to its basic intended purpose: addressing how Commissioners, in their policy-making roles effectively utilize organizational resources (including staff time) to fulfill their responsibilities, while respecting the role of the Executive Director who must ensure appropriate deployment of operational resources (including personnel) as the “administrative head” of the Commission
 - Benefit: Increased focus on Strategic/Long-Term Planning outcomes within the Executive Director Goals, as approved by Commissioners
- Additional obligations, such as the administrative procedures under G. L. c. 30A, requires a productive and professional relationship between Commissioners and the Executive Director for an efficient organization



Agent Registration

Challenges from Existing Regulations

- Ongoing Regulatory Burden
- Alignment with Other Regulations
- Creating Registrations That Align With Existing Licenses and New License Types
- Providing Opportunity and Continued Employment
- Next Steps



Ongoing Regulatory Burden

Current Regulatory Language for Adult Use Marijuana Establishment

- 500.030: Registration of Marijuana Establishment Agents
 - (8) A Marijuana Establishment Agent affiliated with multiple Marijuana Establishments shall be registered as a Marijuana Establishment Agent by each Marijuana Establishment and shall be issued an Agent Registration Card for each establishment

Alignment with Other Regulations

- 500.029: Registration and Conduct of Laboratory Agents
 - (6) A Registration Card shall be valid for one year from the date of issue and may be renewed on an annual basis on a determination by the Commission that the applicant for renewal continues to be suitable for registration based on satisfaction of the requirements included in 935CMR 500.800 and 500.801 or 935 CMR 500.803.
- We can mirror the language for Marijuana Establishment Agent which reads: 500.030:
Registration of Marijuana Establishment Agents
 - (5) An Agent Registration Card shall be valid for one year from the date of issue and may be renewed thereafter on a triennial basis on a determination by the Commission that the applicant for renewal continues to be suitable for registration.



Creating Registrations That Align With Existing Licenses and New License Types

- Outdoor Cultivators
- Marijuana Event Organizer



Providing Opportunity and Continued Employment

- Goal: Not to lose industry workers
- Goal: Transition to another Licensee



Providing Opportunity and Continued Employment

Considerations

- Agent Registration Timeline
- Background Checks
- Agent Registration



Next Steps

- Incorporate Changes to Agent Registration 500.029 and 500.030 in current regulation changes – ME Agents and ITL Agents
- Invite Feedback on Temporary License Type and Agent Registration Transition





Complaint Resolution Administrator

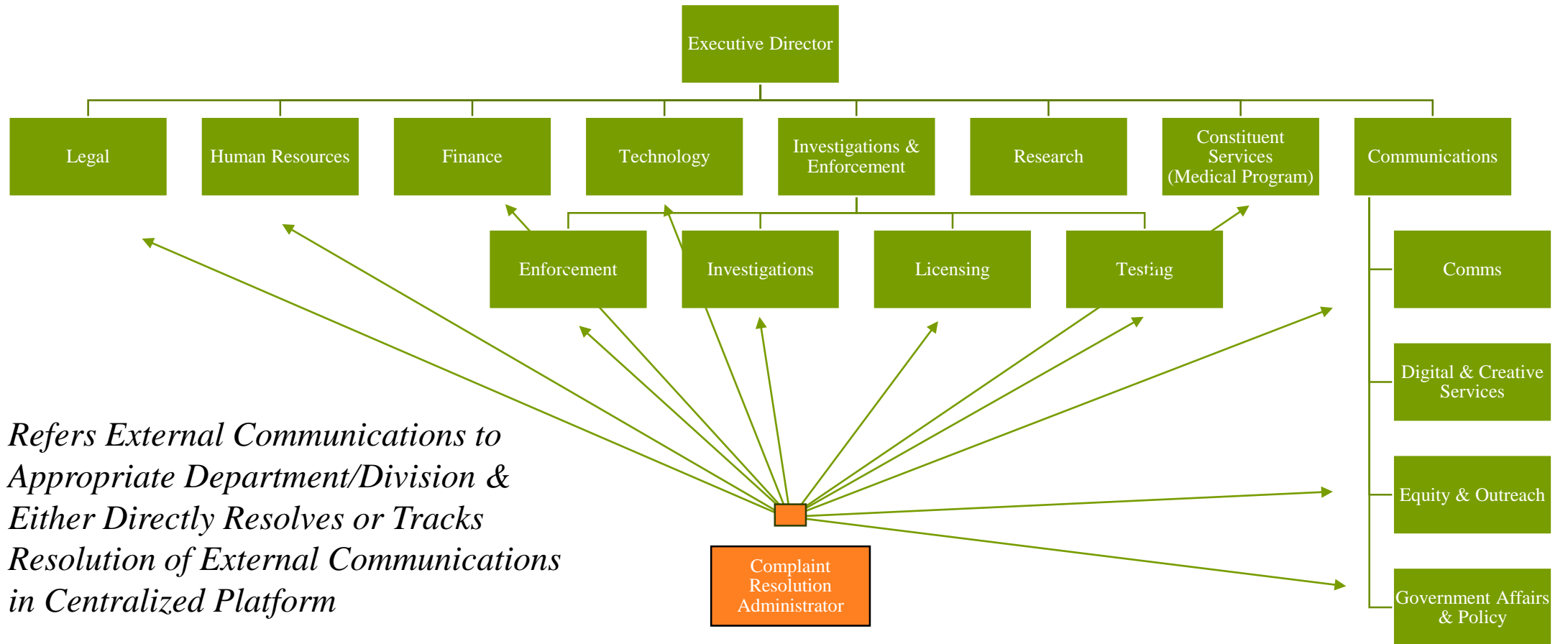
Complaint Resolution Administrator (CRA) – May 22, 2025

- **Genesis of Creation of the CRA Position – Executive Director**
 - Centralized “Tipline” for End-User Experience and Public Health/Safety Focus
- **Job Description Development Highlights – Chief People Officer**
 - Reporting Structure: Initially will sit within I&E to ensure proper redundancy and avoid a “single-point-of-failure” but exhibits a level of autonomy (similar to Hearing Officer) when referring issues outside of I&E to address conflict of interest scenarios
 - Needs to possess a holistic understanding of the organization to ensure a positive end-user experience for external stakeholders (i.e. an internally posted position)
 - Key attributes: Confidentiality & Customer Service
- **Organizational Benefits – Executive Director**
 - Centralizing external calls that currently go through 20+ points of entry; optimizing other positions in various departments
 - “Tipline” can reasonably be assumed to generate fines (currently would impact MRF)



Complaint Resolution Administrator (CRA) – May 22, 2025

- Organizational Chart (Overview)



Complaint Resolution Administrator (CRA) – May 22, 2025

- **Budget Impact Discussion (FY2025 & FY2026) – Chief Finance & Accounting Officer**
 - 153 Budgeted Positions in FY2025 (137 filled, incl. Commissioners)
 - Current Vacancies (16)
 - Current Positions in Final Hiring Stages (e.g. Director of Testing)
 - Flat FY2026 Budget (\$19.88M), prior to CRA position, projects a ~\$1M shortfall based on normal growth/inflationary pressure on flat budget
- **Recommendations (5/22/25) – Executive Director**
 1. Post Job Description (as presented) for an Internal Job Posting – pay range starts at ~\$75k
 2. Evaluate the following elements – first 90 and 180 days:
 - a. Develop Policy & SOP(s) for this position and review with all departments during this period
 - b. Review impact to workload of other departments
 3. ED to institute Hiring Freeze for all departments requiring ED review and approval for any exceptions (6/1/25, until further notice) – will not impact current recruitments (e.g. Dir. of Testing)

Commission Discussion and Votes

- 4. Draft Guidance on Positive Impact Plans
- 5. Draft Guidance on Equity



Commission Discussion and Votes

6. Commission Election of Secretary





Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Public Meeting dates are tentative and subject to change

Next Meeting Date

June 12, 2025

Public Meeting
Hybrid via Teams
10:00 am

2025 Public Meetings*

July 10	October 9
August 14	October 23
September 11	November 13
September 23	December 11





The Commission is in Executive Session



**The Commission is in recess
until 11:02**