



Cannabis Control Commission Public Meeting

In Person and Remote via Teams



Meeting Book - Cannabis Control Commission Public Meeting - Copy

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October 7, 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

October 9, 2025
10:00 AM

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

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Appointment of Acting Secretary (*Vote*)
- IV. Minutes
 1. July 10, 2025
 2. July 28, 2025
 3. July 29, 2025
 4. August 14, 2025
- V. Executive Director and Commission Staff Report
 1. Eighth Anniversary Video
 2. FY 2027 Budget Development Update *Chief Financial and Accounting Officer Lisa Schlegel*
 3. Update on MMJOS Transitions *Chief Technology and Innovation Officer Paul Clark*
 4. Licensing Data Updates *Director of Licensing Olivia Koval*
- VI. Staff Recommendations on Changes of Ownership
 1. Cosmopolitan Dispensary, Inc.
 2. Green World, LLC
- VII. Staff Recommendations on Renewal Licenses
 1. 140 Industrial Road, LLC (#MPR244320)
 2. ACMJ, Inc. (#MCR140956)
 3. Alternative Therapies Group II, Inc. (#MRR206952)
 4. Cedar Roots LLC (#MCR140957)



5. Curaleaf Massachusetts, Inc. (#MPR244348)
 6. Curaleaf Massachusetts, Inc. (#MCR140952)
 7. Ember Gardens Cape Cod LLC (#MRR207313)
 8. Four Daughters Compassionate Care, Inc. (#MPR244356)
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 10. Green Meadows Farm, LLC (#MCR140761)
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 12. Hennep, Inc. (#MRR207134)
 13. High Hopes LLC (#MRR206989)
 14. House of Ermias (#MRR207341)
 15. I.N.S.A., Inc. (#MRR207333)
 16. In Good Health, Inc. (#MRR207087)
 17. J - B.A.M., INC. (#MCR140946)
 18. J - B.A.M., INC. (#MPR244345)
 19. Mass Cannabis Growers Cooperative (#COR129716)
 20. Massachusetts Green Retail, Inc. (#MRR207340)
 21. Mayflower Medicinals, Inc. (#MRR207328)
 22. Mayflower Medicinals, Inc. (#MRR207334)
 23. Mayflower Medicinals, Inc. (#MPR244352)
 24. Motah 420 LLC (#MPR244353)
 25. Ocean Breeze Cultivators LLC (#MRR207360)
 26. Paper Crane Provisions, LLC (#MCR140711)
 27. SAWF Estate LLC (#MRR207283)
 28. SunnyDayz Inc. (#MCR140960)
 29. Surf's Up Cannabis Ventures LLC (#MRR207279)
 30. Trifecta Farms Corp (#MCR140963)
 31. Witch City Gardens LLC (#MRR207352)
- VIII. Staff Updates on Expired Conditions on License Renewals
1. New Dia Fenway LLC (#MRR207158)
 2. GreenSoul Organics, Inc. (#MRR207239)
- IX. Staff Recommendations on Provisional Licenses
1. Canna-Farm LLC (#MCN283953), Marijuana Cultivator / Tier 5 / Indoor
 2. WildWeeds Corp (#MBN282540), Marijuana Microbusiness
- X. Staff Recommendations on Final Licenses
1. Tower Three, LLC (#MP281783), Marijuana Product Manufacturer
 2. Uproot, LLC (#MD1344), Marijuana Delivery Operator
- XI. Staff Recommendations on Responsible Vendor Training



1. Online Training Providers LLC (DBA Cannabis Training University, CTU, Online Cannabis Education, OCE) (#RVN453966)
- XII. Staff Recommendations on Responsible Vendor Training Renewals
 1. Cannabis Trainers (#RVR453160)
 2. Medical Marijuana 411 (MM411, Inc) (#RVR453155)
 3. Stoker Consulting LLC (#RVR453154)
- XIII. Hearing Officer Recommended Decision
 1. Elev8 Cannabis, Inc.
- XIV. Commission Discussion and Votes
 1. License Extensions for Host Community Agreement Compliance (*Vote*)
 2. Delegation for Petitions to Changes of Regulations (*Vote*)
 3. Eighth Annual Activities Report (*Vote*)
 4. General Matters Legal Billing
 5. Standing Delegation of Acting Chair
- XV. New Business Not Anticipated at the Time of Posting
- XVI. Next Meeting Date
- XVII. 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.





CANNABIS CONTROL COMMISSION

July 10, 2025
10:00 AM

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Staff Recommendations on Renewal Licenses
 - Staff Recommendations on Provisional Licenses
 - Staff Recommendations on Final Licenses
 - Staff Recommendations on Responsible Vendor Training Renewal Licenses
- [Meeting Packet](#)
- Bill H. 4160, An Act Modernizing the Commonwealth's Cannabis Laws

In Attendance:

- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

I. Call to Order

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

II. Commissioners' Comments & Updates – 00:02:58

- Commissioner Concepcion noted that it was 7/10 day and stated that she would be participating in speaking events with the AC regarding Social Consumption. Commissioner Roy stated that she had visited The Vault and had learned more about Employee Stock Ownership Plans which they had found helpful for employee retention. Additionally, she noted that she had guested on an upcoming episode of The High Ya Doin Podcast. The AC discussed meetings that he had with the Supplier Diversity Office, Senator Dylan Fernandez as well as a tour of Wonderland Cannabis. Additionally, he noted virtual meetings with some of the Commonwealth's mayors hosted by the Massachusetts Municipal Association (MMA) and with officials from Hampshire and Franklin counties regarding the Social Consumption framework.



III. Minutes for Approval – 00:07:58

- April 17, 2025
- Commissioner Concepcion moved to approve the April 17, 2025, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the April 17, 2025, Commission Public Meeting minutes.

- May 8, 2025
- Commissioner Roy moved to approve the May 8, 2025, Commission Public Meeting minutes.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the May 8, 2025, Commission Public Meeting minutes.

- May 12, 2025
- Commissioner Concepcion moved to approve the May 12, 2025, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the May 12, 2025, Commission Public Meeting minutes.

- May 22, 2025 (AM Public Meeting)
- Commissioner Roy moved to approve the May 22, 2025, (AM Public Meeting) Commission Public Meeting minutes.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes



- The Commission unanimously approved the May 22, 2025, (AM Public Meeting) Commission Public Meeting minutes.
- May 22, 2025 (PM Public Meeting)
- Commissioner Roy moved to approve the May 22, 2025, (PM Public Meeting) Commission Public Meeting minutes.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the May 22, 2025, (PM Public Meeting) Commission Public Meeting minutes.

IV. Executive Director and Commission Staff Report – 00:11:34

1. Summary Suspension Order Update

- Executive Director (ED) Travis Ahern explained that the summary suspension order which had been recently issued was chosen to address public health concerns and noted that he would only repeat publicly available information as Commissioners may adjudicate the matter in the future. He stated that he planned to launch a portal on the Commission’s website to highlight future public health advisories and provide an update on the Commission’s ability to recall products at a future Public Meeting. Chief of Investigations and Enforcement Nomxolisi Jones (Chief Jones) explained that these types of orders were issued to address imminent public health, safety and welfare issues.
- The AC suggested taking the agenda out of order and there were no objections.

V. Commission Discussion and Votes – 00:18:53

1. Tier Relegation Update

- Director of Enforcement Training Armond Enos (Director Enos) summarized how other jurisdiction’s approaches handled this topic. He explained California’s approach which allowed for Licensees to reduce their canopy size upon renewal and for a one-time change outside of the renewal process. He described how Massachusetts, New York and Colorado had given their regulatory agencies more flexibility in determining what factors to consider while reducing canopy while others had taken a more conservative approach either through limiting total canopy, limiting the tiers which a new Licensee may apply for as well as moratoriums on new cultivator applications. Overall, Director Enos stated that other states had been more prescriptive regarding Licensees increasing canopy. Commissioner Roy stated that House Bill 4160 could require the Commission to do a market analysis and consider moratoriums on applications and read from the bill. She asked if the Commission had ever involuntarily relegated a Licensee’s tier and Chief Jones responded that no relegations had been involuntary. Chief Jones further clarified that the purpose of this



discussion item was to seek guidance from Commissioners on whether tier relegation should be considered for cultivators at renewal. The ED summarized the timeline and stated that additional considerations could be brought before the board at the regular August meeting.

2. Review of Regulatory Process for Notices of Deficiency, Plans of Correction and Petition Process

- Director Enos summarized the process for issuing Notices of Deficiency (NODs) after which the Licensee would submit a Plan of Correction (POC) which would identify how they planned to come back into compliance. Enforcement staff would then determine whether to accept the POC or to reject it, after which the Licensee has five business days to submit an amended POC.
- General Counsel Kajal Chattopadhyay (GC Chattopadhyay) described the process for submitting petitions for regulatory change under 935 Code Mass. Regs. § 500.830, pursuant to which stakeholders could request an adoption, amendment or repeal of regulatory language. Their petition would need to specify the specific request and provide information on why they were petitioning for change. He further noted that review of petitions had been delegated to the ED and Commissioner Roy suggested potentially rescinding that delegation and Commissioner Concepcion concurred. GC Chattopadhyay stated that he could provide an overview of petitions which had been received at the August meeting.
- The Commission took a brief recess. (Returned at 01:41:22).

3. Commission Policy Discussion – Sale of Shelf Stable Food Items in Marijuana Establishment Retail Licensees

- Commissioner Roy stated that she had brought this topic to the board as it had come up during discussions regarding Social Consumption. She noted the Commission's current policy, which did not allow for the sale of Shelf-stable food items, and reviewed how other jurisdictions had handled this topic. She explained that she was seeking feedback to provide Marijuana Establishments (MEs) with further clarity on the products they could sell. The ED noted that the public comment period on the draft Social Consumption regulations would allow the Commission to seek feedback from stakeholders on the topic. Commissioner Roy suggested potentially taking language from 935 Code Mass. Regs. § 501.105(19)(g) to provide clarity on what products Licensees would be prohibited from selling. Commissioner Concepcion confirmed that she was in favor of this change provided there was language addressing the items which Licensees would be barred from selling. The AC confirmed consensus on the topic and Commissioner Roy stated she would bring it back before the board at the July 28th meeting.

4. Restricted Communities Outreach Update

- Director of Government Affairs and Policy Matt Giancola (Director Giancola) explained that the Commission had received feedback from 22 municipalities in response to outreach reminding them of the option to allow for delivery, and his department planned targeted outreach for the remaining towns which did not allow



delivery. He confirmed for Commissioner Roy that he would communicate the update to delivery Licensees and the AC volunteered to work offline with Director Giancola to communicate the benefits of allowing delivery to public health officials. Commissioner Concepcion requested an update from Legal regarding potentially allowing for delivery to no-towns.

5. Social Equity Program Application Update

- Director of Equity Programming and Community Outreach Silea Williams (Director Williams) stated that applications for the Social Equity Program (SEP) would begin on August 1, 2025. She highlighted the eligibility requirements and different tracks which were available to the program's participants. Commissioner Concepcion asked about networking opportunities and Director Williams confirmed that she was planning on scheduling in-person events and encouraged anyone interested to sign up for the EquityWorks platform, which had a dedicated section for SEP participants and Economic Empowerment Priority Applicants (EEAs). Director Williams further detailed the benefits offered to SEP participants such as reduced fees, expedited License review and access to exclusive License-types. She stated that there would be hybrid and in-person support clinics for anyone interested in applying to the program. Director Williams added that her department was moving away from designated cohorts and that the SEP curriculum was always available to participants.
- The Commission took a brief recess. (Returned at 03:30:13.)
- Director of Licensing Olivia Koval (Director Koval) presented highlights from Licensing data and Commissioner Roy requested an edit to a slide to indicate the number of Licensees who were operational and requested meetings offline to confer with Legal regarding Host Communities not signing compliant Host Community Agreements (HCAs).

VI. Staff Recommendations on Changes of Ownership – 03:43:34

- Licensing Analyst Jaime Wakefield (Analyst Wakefield) presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals, Provisionals, Final Licenses and Responsible Vendor Training Renewal Licenses.

1. ACMJ, Inc.

- Commissioner Concepcion moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

2. Alexsofia LLC



- Commissioner Roy moved to approve the Change of Ownership.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Change of Ownership.
3. Green Era LLC
- Commissioner Concepcion moved to approve the Change of Ownership.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Change of Ownership.
4. High Five Inc.
- Commissioner Roy moved to approve the Change of Ownership.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Change of Ownership.
5. Old Planters of Cape Ann, Inc.
- The AC asked what steps this Licensee had taken in order to remedy a Notice of Deficiency (NOD) which had previously been issued to this Licensee. Commissioners agreed to circle back to this License after staff had researched the issue.
6. Sanctuary Medicinals, Inc.
- Commissioner Concepcion moved to approve the Change of Ownership.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Change of Ownership.
7. The Hedyco LLC
- Commissioner Roy moved to approve the Change of Ownership.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:



- Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

8. Volcann LLC

- Commissioner Concepcion moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

VII. Staff Recommendations on Renewal Licenses – 04:00:57

- Commissioner Concepcion moved to approve the renewal of items numbered 1 – 30 as indicated on the agenda.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the renewal of items numbered 1 – 30 as indicated on the agenda.

VIII. Staff Recommendations on Provisional Licenses – 04:02:29

1. DEO Enterprises, Inc. (#MTN281737), Marijuana Third Party Transporter

- Commissioner Roy moved to approve the Provisional License.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Provisional License.

2. Elevated Roots III, LLC (#MRN285298), Marijuana Retailer

- The AC requested a condition:
 - Proposed condition: Prior to Final Application for Licensure, consider review and update of diversity hiring goals in Diversity Plan based on statistics of Host Community and region in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8.k. and provide a response to CCC Licensing Division.
- Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by the AC.



- Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the condition requested by the AC.
3. Herbal Power, LLC (#MRN285303), Marijuana Retailer
- Commissioner Roy moved to approve the Provisional License.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License.
4. Morabeza, LLC (#MDA1333), Marijuana Delivery Operator
- Commissioner Roy requested a condition.
 - Proposed condition: In accordance with 935 Code Mass. Regs. § 500.146(5)(a-j), a Delivery Operator shall make available educational materials about Finished Marijuana Products to Consumers. A Delivery Operator shall have an adequate supply of current educational material available for distribution. Prior to final licensure please provide the Commission with a copy of your consumer education.
 - Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.
5. Responsible and Compliant Southwick LLC (#MRN285245), Marijuana Retailer
- Commissioner Roy moved to approve the Provisional License.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License.
6. Uproot, LLC (#MDA1344), Marijuana Delivery Operator
- Commissioner Roy requested a condition.



- Proposed condition: In accordance with 935 Code Mass. Regs. § 500.146(5)(a-j), a Delivery Operator shall make available educational materials about Finished Marijuana Products to Consumers. A Delivery Operator shall have an adequate supply of current educational material available for distribution. Prior to final licensure please provide the Commission with a copy of your consumer education.
- The AC requested two conditions.
 - Proposed condition: Prior to Final Application for Licensure, consider review and update of diversity hiring goals in Diversity Plan based on statistics of Host Community and region in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8.k. and provide a response to CCC Licensing Division.
 - Proposed condition: Prior to Final Application for Licensure, clarify diversity hiring goals and measurements in Diversity Plan for low and moderate income individuals in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8.k. and provide a response to CCC Licensing Division.
- Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.

IX. Staff Recommendations on Final Licenses – 04:14:34

1. Berkley Botanicals, LLC (#MR284877), Marijuana Retailer
 2. Eagles Landed, LLC (#MP282259), Marijuana Product Manufacturer
 3. EVG Farms, LLC (#MR284535), Marijuana Retailer
 4. Green Meadows Farm, LLC (#MR285191), Marijuana Retailer
 5. Pioneer Valley Trading Company, LLC (#MR285301), Marijuana Retailer
- Commissioner Concepcion moved to approve the Final License roster from 1 – 5 as indicated on the agenda.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Final License roster from 1 – 5 as indicated on the agenda.

X. Staff Recommendations on Responsible Vendor Training Renewal Licenses – 04:15:57

1. Cannabis Trainers (#DCCR794123)



- Commissioner Roy moved to approve the Responsible Vendor Training License Renewal.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Provisional License.
- The Commission took a brief recess. (Returned at 04:31:19.)

XI. Staff Recommendations on Changes of Ownership (Continued)

1. Old Planters of Cape Ann, Inc.

- The AC stated that a condition was necessary.
 - Proposed condition: Upon approval and effectuation of Change of Ownership, applicant must provide to the Department of Licensing evidence and attestation that the issues raised in the Plan of Correction have been resolved.
- Commissioners discussed the condition and Chief Jones confirmed that she was comfortable with the language.
- Commissioner Roy moved to approve the Change of Ownership, subject to the condition requested by the AC.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership, subject to the condition requested by the AC.

XII. New Business Not Anticipated at the Time of Posting – 04:40:23

- The AC stated that there was no new business which was not anticipated at the time of posting.

XIII. Next Meeting Date – 04:40:31

- The AC stated that the next meeting was scheduled for July 28, 2025.

XIV. Adjournment – 04:42:06

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



CANNABIS CONTROL COMMISSION

July 28, 2025
10:00 AM

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

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Staff Recommendations on Renewal Licenses
 - Staff Recommendations on Provisional Licenses
 - Staff Recommendations on Final Licenses
 - Staff Recommendations on Responsible Vendor Training Renewals
- [Meeting Packet](#)

In Attendance:

- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

I. Call to Order

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

II. Commissioners' Comments & Updates – 00:01:13

- Commissioners thanked staff for preparing the day's meeting and Commissioner Roy celebrated the recent \$8 billion adult-sales milestone.

III. Staff Recommendations on Changes of Ownership – 00:03:49

- Licensing Analyst Jaime Wakefield (Analyst Wakefield) presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals, Provisionals, Final Licenses and Responsible Vendor Training Renewal Licenses.

1. Beacon Compassion Inc.

- Commissioner Concepcion moved to approve the Change of Ownership.



- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

2. PharmaCannis Massachusetts, Inc.

- Commissioner Roy moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

IV. Staff Recommendations on Renewal Licenses – 00:06:54

- Commissioner Concepcion moved to approve the renewal of items numbered 1 – 17 as indicated on the agenda.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the renewal of items numbered 1 – 17 as indicated on the agenda.

V. Staff Recommendations on Provisional Licenses – 00:08:06

1. Charles Town Cannabis, Inc. (#MRN285114), Marijuana Retailer

- Commissioner Roy moved to approve the Provisional License.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Provisional License.

2. Rivers' Leaves of Natural Healing, Inc. (#MRN285254), Marijuana Retailer

- Commissioner Concepcion moved to approve the Provisional License.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes



- AC Stebbins – Yes
- The Commission unanimously approved the Provisional License.

VI. Staff Recommendations on Final Licenses – 00:11:13

1. Ignited Culture, Inc (#MR284438), Marijuana Retailer
 - Commissioner Roy moved to approve the Final License.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Final License.

VII. Staff Recommendations on Responsible Vendor Training Renewal Licenses – 00:12:25

1. DSBWorldWide, Inc. (#RVR453156)
 - Commissioner Roy moved to approve the Responsible Vendor Training License Renewal.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Responsible Vendor Training License Renewal.

VIII. Commission Discussion and Votes – 00:13:53

1. Open Meeting Law Complaint Update
 - General Counsel Kajal Chattopadhyay (GC Chattopadhyay) explained that the Commission had received an Open Meeting Law (OML) complaint on June, 25, 2025 alleging that the Commission had intentionally failed to post notice for the State of Cannabis event. He noted that the complaint was not timely and discussed the actions taken by the Commission prior to the event to highlight it publicly. He suggested that the Commissioners direct him to reply to the complaint in order to explain that there had been no attempt to evade OML. Commissioner Concepcion stated that she had first created the State of Cannabis event to highlight the work completed by staff and not focused on the board.
 - Commissioner Concepcion moved to direct the General Counsel to respond to the OML complaint consistent with his presentation at the July 28, 2025, meeting.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes



- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 00:44:56.)

2. Discussion and Review of Draft Regulations and Policy

- The AC stated that the purpose of this discussion item was to revisit sections which Commissioners had agreed to circle back to before the official public comment period. The group began with 935 Code Mass. Regs. § 500.002 and Enforcement Counsel Timothy Goodin (EC Goodin) proposed new definitions for Diversion and Inversion which Commissioners discussed with staff. They found consensus on “Diversion means the unauthorized or intentional removal of Marijuana or Marijuana Products from the Cannabis Control Commission's regulated market” and “Inversion means the unauthorized insertion of Marijuana or Marijuana Products cultivated or produced by an individual entity not licensed by the Cannabis Control Commission into the regulated market.” Deputy General Counsel Michael Baker (DGC Baker) noted that a significant change to the draft before the group was the definition of Event Plan and asked for public feedback.
- Commissioner Roy requested a new definition of Commission Delegee to allow for the Commission to partner with non-governmental organizations to carry out the Secret Shopper Program. DGC Baker suggested edits later in the regulations to allow for this as Commission Delegee was used throughout the regulations. He volunteered to work offline to address the issue and the Executive Director (ED) stated that he would provide a timeline to get this edit into the current round of regulatory amendments. The AC suggested an edit to the definition of Consumption Area to strike “or” after the word “purchase.” Commissioners discussed the edit and agreed to include it. The AC suggested a further edit to the definition of Principal Place of Business and Commissioners agreed to a new definition to read: “Principal Place of Business means the primary location where a Licensee manages its licensed operations.”
- Commissioners discussed 935 Code Mass. Regs. § 500.030(3) and how to reduce the costs of unnecessary Criminal Offender Record Information (CORI) checks with staff and decided to recess.
- The Commission took a brief recess. (Returned at 03:30:35.)
- The AC resumed discussion of 935 Code Mass. Regs. § 500.030(3) and how to best eliminate the need for duplicative CORI checks. DGC Baker suggested including “in accordance with 803 CMR 2.00” at the end of the section and there were no objections. Commissioners continued discussing (3) and decided to change the ending to “... provided however, that a CORI shall not be required when one was already completed within the previous calendar year for an employee transferring to, or working within and between Licensees who share the same Persons or Entities Having Direct and Indirect Control in accordance with 803 CMR 2.11(7).” Commissioners agreed to circle back to this section after obtaining more data on outdoor cultivators and EC Goodin suggested an additional potential amendment to indicate that agents must notify the Commission of any changes to their suitability status and to cross reference the suitability sections in the regulations. The AC moved to (8) and suggested an edit to read: “A Marijuana Establishment Agent may be



- issued a single Agent Registration card covering all Licenses held by the same Persons or Entities Having Direct or Indirect Control.” No Commissioners objected to the change and there were no further amendments until 935 Code Mass. Regs. § 500.050(9)(a)1. where Commissioner Roy suggested striking the sentence indicating that Marijuana Transporters could not hold another Marijuana Establishment (ME) License in order to allow them to participate in Social Consumption. Commissioner Concepcion suggested an alternative amendment to allow Third-party Transporters to move to the Existing Licensee Transporter License-type and DGC Baker offered to work offline with her to develop an amendment. There were no further requested amendments until 935 Code Mass. Regs. § 500.101(3)(i)8., where DGC Baker explained that the requirement to submit summaries of policies and standards was intended to reduce the burden on Licensees. Chief of Investigations and Enforcement Nomxolisi Jones (Chief Jones) suggested that this might create unnecessary back and forth on not-yet-finalized policies, which Commissioners discussed and the ED stated he would revise and bring the section back for Commissioner’s consideration.
- The Commission took a brief recess. (Returned at 05:04:03.)
 - Commissioner Concepcion resumed conversation of 935 Code Mass. Regs. § 500.101(3)(i)8. and suggested replacing “summaries” with “plans” and there were no objections. DGC Baker continued to summarize the redline amendments until 935 Code Mass. Regs. § 500.105(12) where Director of Investigations Katherine Binkoski (Director Binkoski) explained that edits had been made to reduce the number of agents who must be present at the time of wasting and to provide flexibility for wasting different product types.
 - Commissioner Roy asked if the current policy of a 72-hour waiting period to commence operations following notification of approval to do so was still useful to Investigations and Enforcement and Chief Jones stated that, in her opinion, it was no longer necessary. Chief Jones suggested providing some time to debrief the ED on the topic and for the Legal department to draft motion language for a future Public Meeting.
 - Commissioners continued reviewing the redline amendments and there were no further requested edits until 935 Code Mass. Regs. § 500.110(9)(a)7. and 10. where Commissioner Concepcion requested to strike the word “applicable”. The next edit was to 935 Code Mass. Regs. § 500.140(3)(e), where Commissioner Concepcion requested to replace “may” in the second sentence with “shall” and Commissioner Roy asked if “Marijuana Establishment” should be changed to “Marijuana Retailer.” Commissioners discussed the latter and decided to leave the section as-is. Related to these sections, EC Goodin suggested revisiting the definition of Shelf-stable Foods to provide more clarity. DGC Baker stated that he would confirm if this was necessary with the Department of Public Health (DPH) and Commissioner Roy noted that further edits to 935 Code Mass. Regs. §§ 500.145(g) and .146(4)(f) may be necessary depending on their feedback. Commissioners discussed the potential outcomes of allowing MEs to sell Shelf-stable food products and the AC suggested revisiting the topic in the next day’s meeting and after hearing from stakeholders during the public comment period.



- The AC continued the review of the redline amendments and EC Goodin suggested an edit to 935 Code Mass. Regs. §500.141(2)(k) to indicate what action the Commission would take in the event that a municipality's chief law enforcement officer did not provide comment on a Licensee's procedures on assisting impaired Consumers as well as the extent to which the officer's comments were taken under advisement. Commissioner Concepcion suggested striking "for comments" and the AC suggested revisiting this section.
- Regarding 935 Code Mass. Regs. §500.141(2)(p)4., the AC indicated that he would like to add a specific level of filtration system for the negative pressure ventilation system and for (12)(c), he suggested striking "tap".
- DGC Baker asked that Commissioners review 935 Code Mass. Regs. §500.141(2)(e) and (3) before discussing the next day.

IX. Next Meeting Date – 06:39:04

- The AC stated that the next meeting was scheduled for the following day.

X. Adjournment – 06:40:00

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



CANNABIS CONTROL COMMISSION

July 29, 2025
10:00 AM

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- N/A

In Attendance:

- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

I. Call to Order

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

II. Commission Discussion and Votes – 00:04:24

1. Discussion and Review of Draft Regulations and Policy Questions

- Deputy General Counsel Michael Baker (DGC Baker) began the conversation with 935 Code Mass. Regs. § 500.141(2)(b) and asked for feedback. Commissioner Roy requested an edit to indicate that the QR code required for Marijuana and Marijuana Products at Social Consumption Establishments (SCEs) would link to the products' Certificate of Analysis (COA). Commissioner Concepcion noted that this section related more to general Consumer education. DGC Baker suggested moving this section to (4) and there were no objections, although Commissioner Roy requested an edit to (b)2. to indicate that SCEs would provide information on the duration of effects for whichever products they sold. Commissioners continued to discuss the section and settled on a new 1. to read: "For Edibles, Marijuana-infused Products, or for Beverages, the warning, 'The impairment effects of Marijuana-infused Products may be impacted or delayed up to two hours or more depending on several factors, including but not limited to, potency, method of consumption, amount consumed, alcohol consumption, non-infused food and drink consumption prior to and during the



- use of Marijuana and Marijuana Products, and body-weight, previous use, prescription medication used and tolerance of the Consumer.”
- The Commission took a brief recess. (Returned at 01:13:22.)
 - DGC Baker proposed a new 935 Code Mass. Regs. § 500.141(2)(b)3., which Commissioners discussed and found consensus on “A QR code or other machine-readable code technology that shall provide access to the Certificate of Analysis for all sales of Marijuana and Marijuana Products at a Social Consumption Establishment.” DGC Baker moved the conversation to 935 Code Mass. Regs. § 500.141(3) and asked for feedback on the proposed 10 milligram dosage limit for SCEs. Commissioner Roy expressed some concern regarding overconsumption and supply chain issues and Commissioners agreed to reduce the maximum dosage for edibles to 5 milligrams. Regarding 935 Code Mass. Regs. § 500.141(3)(c), DGC Baker proposed amended language which Commissioners discussed and found consensus on the following: “Notwithstanding 935 CMR 500.105(6)(c)2.c., 935 CMR 500.105(6)(e), Social Consumption Establishments may sell Beverages, including Beverages infused with Tinctures, and agents may portion the Beverage to a Consumer in a single serving not to exceed 5 milligrams of delta-nine-tetrahydrocannabinol or multiple servings not to exceed 10 milligrams of delta-nine-tetrahydrocannabinol, per individual, per transaction.” Commissioner Roy expressed some concern that Consumers would be able to overserve themselves with self-serve Tincture and the AC stated that this section would be further amended to address the concern. DGC Baker read a new proposed 935 Code Mass. Regs. § 500.141(3)(d). Commissioners discussed the amendments and agreed to resume the conversation after a recess.
 - The Commission took a brief recess. (Returned at 03:17:06.)
 - Associate General Counsel Philip Schreffler (AGC Schreffler) resumed the conversation by providing background for Commissioner Roy on how the working group had landed on Consumers infusing their own Non-infused Products in order to preserve the latter as food under the Department of Public Health (DPH) regulations until both were the property of the Consumer. DGC Baker proposed a new 935 Code Mass. Regs. § 500.141(3)(c), which he had further developed during the recess to read: “Notwithstanding 935 CMR 500.105(6)(c)2.c., and 935 CMR 500.105(6)(e), Social Consumption Establishments may sell Beverages and agents may portion the Beverage in a single serving not to exceed 5 milligrams of delta-nine-tetrahydrocannabinol or multiple servings not to exceed 10 milligrams of delta-nine-tetrahydrocannabinol.” The AC confirmed consensus among Commissioners on the new (c) as well as a new (d) which read: “Marijuana-infused Products not otherwise restricted in dosage and serving amount under 935 CMR 500.105(6)(c) and 935 CMR 500.141(3) shall be limited in a dosage and serving amount consistent with 935 CMR 500.105(6)(e). Agents may portion the Marijuana-infused Product in a single serving not to exceed 5 milligrams of delta-nine-tetrahydrocannabinol or multiple servings not to exceed 10 milligrams of delta-nine-tetrahydrocannabinol.” The AC suggested circling back on the topic of limiting the sale of flower. DGC Baker continued



- reviewing (3) and Commissioners requested edits to (3)(f) to indicate that SCEs may allow for delivery of food on-site and that Licensees must obtain the appropriate authorization from the DPH before becoming licensed. Finally, in (3), DGC Baker volunteered to draft a new (3)(h) which would indicate that SCEs may rent Accessories and another to specify that Consumers would be limited to purchasing an eighth of flower per transaction.
- Commissioner Roy moved the conversation to 935 Code Mass. Regs. § 500.141(12), where she requested an amendment to indicate that SCEs must provide THC-inhibitors in their Cooling Down Areas. Commissioners discussed whether to include this amendment as Commissioner Concepcion was opposed due to the evolving nature of the science behind THC-inhibitors and Associate General Counsel Erica Bruno (AGC Bruno) suggested submitting a memorandum alongside the draft regulations to seek public comment on THC-inhibitors. The AC suggested also including the topic of Shelf-stable foods and Third-party Transporters in the memorandum and no Commissioners objected. Commissioners discussed the latter topic and potentially striking the first sentence of 935 Code Mass. Regs. § 500.050(9)(a)1. and the AC noted that a definition of Third-party Transporter would need to be added.
 - The Commission took a brief recess. (Returned at 05:35:44.)
 - The AC resumed conversation with 935 Code Mass. Regs. § 500.030(3) and how to avoid having Licensees perform duplicative Criminal Offender Record Information (CORI) checks. Commissioners discussed and Director of Investigations Katherine Binkoski (Director Binkoski) requested a recess.
 - The Commission took a brief recess. (Returned at 06:30:56.)
 - Director of Licensing Olivia Koval (Director Koval) explained that her team had reviewed the draft regulations and determined that the section of 935 Code Mass. Regs. § 500.030(3) beginning with “provided however” was not necessary in light of (8). She suggested replacing the language in (3) with citations to 935 Code Mass. Regs. §§ 500.801(3) and 500.802(3). Commissioners discussed and agreed to the change as well as the following addition to 935 Code Mass. Regs. 500.029(3) “...provided however, that a CORI shall not be required when one was already completed within the previous calendar year for a Laboratory Agent working within and between Licensees who share the same Persons or Entities Having Direct and Indirect Control in accordance with 803 CMR 2.11(7).”
 - The AC summarized that the two remaining issues were the topics of Shelf-stable food products and limiting sales of flower at SCEs. DGC Baker stated that he was comfortable drafting a section on the limitation of flower offline based off of previous conversations and Commissioners confirmed they were agreeable. The AC stated that the memorandum discussing topics which were not included in the draft regulations seeking public comment would be discussed at a future Public Meeting.
 - Commissioner Roy moved to direct the Legal Department to submit the draft regulations, of 935 CMR 500 and 935 CMR 501, to the Secretary of the Commonwealth and to make any ministerial or necessary changes to the regulations



in order to effectuate the changes proposed by the Commission relative to Social Consumption Establishments and other amendments.

- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

- Commissioner Concepcion moved for the Commission and staff to prepare a memorandum for discussion at the August Public Meeting to express the Commission’s interest in seeking public input and comments on the Social Consumption Establishment regulations and other amendments and to highlight areas of particular interest for public feedback and commentary.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

III. Adjournment – 07:06:15

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



CANNABIS CONTROL COMMISSION

August 14, 2025
10:00 AM

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Staff Recommendations on Renewal Licenses
 - Staff Recommendations on Responsible Vendor Training Renewal Licenses
- [Meeting Packet](#)

In Attendance:

- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

I. Call to Order

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

II. Commissioners' Comments & Updates – 00:01:35

- Commissioner Concepcion congratulated the AC on his reappointment and thanked the Social Consumption working group for their work on the new regulations. Commissioner Roy echoed the congratulations and noted her attendance at the ribbon cutting for Alternative Compassion Services and guest appearance on the Freshly Gardened podcast. The AC highlighted Devin Alexander's appearance on the Boston Business Journal's 40 under 40 class and a recent visit to Hidden Wonders dispensary. Additionally, he discussed visits to Levia, a round table hosted by the Cannabis Business Association, a tour of Terpene Journey and a meeting with former Chief John Carmichael.

III. Minutes for Approval – 00:10:48

- June 12, 2025



- Commissioner Concepcion moved to approve the June 12, 2025, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the June 12, 2025, Commission Public Meeting minutes.

- June 17, 2025
- Commissioner Roy moved to approve the June 17, 2025, Commission Public Meeting minutes.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the June 17, 2025, Commission Public Meeting minutes.

IV. Executive Director and Commission Staff Report – 00:12:25

- Executive Director (ED) Travis Ahern stated that the regular September meeting would include updates on the FY25 budget closeout, FY26 spending plan and personnel updates. He provided an overview of the day’s topics and provided additional information on the recent Summary Suspension Order which had been issued due to the identification of contaminated and potentially contaminated Marijuana and Marijuana Products. He explained that information on affected products could be found on the Public Health and Safety Advisories Portal.
1. Public Health and Safety Advisories Portal
 - Director of Digital and Creative Services AnnMarie Burt (Director Burt) explained that this portal had launched on August 6, 2025. Stakeholders could sign up for the portal and receive safety advisories by email as well as access to all posted notices and product lists. Commissioner Roy asked if the portal could link to the Commission’s product catalog and Director Burt stated that she would check with the vendor. Commissioner Roy further suggested a meeting with Metrc to make the product catalog more user friendly.
 2. Two-Factor Authentication
 - Chief of Staff Andrew Carter (Chief Carter) explained that the Medical Use of Marijuana Online System (MMJOS) began rolling out two-factor authentication for Certifying Healthcare Provider accounts in June. He stated that Certifying Healthcare Providers would need to review and confirm information in their MMJOS account.



3. Petitions for Changes to Regulations

- General Counsel Kajal Chattopadhyay (GC Chattopadhyay) explained the statutory authority under G.L. c. 30A § 4 for any interested person to petition for the adoption, amendment or repeal of any regulation, which was mirrored under 935 Code Mass. Regs. §§ 500.830 and 501.830. He explained the process for petitioning the Commission where, after receipt of the petition, the Legal department would acknowledge receipt and confirm that it conforms to regulatory requirements. Following that, the GC would make a recommendation to the ED on what action to take. Potential outcomes for petitions would be approval, denial or withdrawal.

4. Waivers of Regulations Update

- Enforcement Counsel Timothy Goodin (EC Goodin) explained the regulatory framework for waivers under 935 Code Mass. Regs. §§ 500.850 and 501.850 and provided background from the December 11, 2017, Public Meeting where Commissioner Doyle had explained that the purpose of waivers was to allow for flexibility in dealing with unforeseen consequences while standing up a new industry. A later comment from then Chair Hoffman at the September 17, 2021, Public Meeting indicated that the waiver process was intended to provide one-off instances of relief from regulations to address unique hardships. EC Goodin explained the internal waiver process whereby review would be assigned to staff who would make a recommendation to the Chief of Investigations and Enforcement (CIE), who would again review and forward to the ED. The ED or their delegatee would again review and make a determination. EC Goodin continued and provided an overview of potential waiver outcomes including approval, denial, withdrawal or administrative closures. He provided metrics on waivers which had been requested from 2020-2024, noting that the majority were denied or approved, as well as the most common adult-use and medical-use waivers which were requested.
- Regarding petitions, Commissioner Roy noted that there was not a dedicated form for petitions provided and GC Chattopadhyay stated he would be happy to develop one. Commissioner Roy stated that she would like to rescind the previous delegation of authority to act on petitions to the ED and Commission Concepcion concurred. Commissioner Roy requested an edit to the presentation on waivers to clarify that the decision ultimately ended with the ED and requested more detailed metrics on petitions at the September meeting. The AC asked if guidance was being provided on whether the waiver or petition process was the right solution for a given issue and EC Goodin stated that he would be happy to work with staff offline on the matter.

5. Host Community Municipal Equity Update

- Director of Investigations Katherine Binkoski (Director Binkoski) provided an update on Host Community Municipal Equity (HCME), explaining that three submissions had been reviewed and accepted by the Commission, 24 were under review and 172 were outstanding. Commissioner Roy asked if submissions for HCME were public documents and could be published for the convenience of other municipalities. GC



Chattopadhyay stated that he would need to review, but many would likely be public documents.

6. Licensing Data Updates

- Director of Licensing Olivia Koval (Director Koval) provided highlights from Licensing data. Commissioner Concepcion asked if a slide could be included to identify towns which did not have compliant Host Community Agreements (HCAs) and GC Chattopadhyay responded that Legal had advised not to include such a slide due to the potential of municipalities being added in error. Commissioners discussed the topic with staff and the ED and GC Chattopadhyay stated they would review the Chapter 180 working group's materials offline and revisit the topic. Director Koval continued her presentation and Commissioner Roy asked if any Licensees were nearing the end of the approved HCA extension limit. Director Koval explained that she would be bringing this topic before the board to discuss and EC Goodin clarified that it was difficult to determine if the waiver process was the proper remedy, but compliant HCAs were a statutory requirement.
- The Commission took a brief recess. (Returned at 03:00:29.)

V. Staff Recommendations on Changes of Ownership

- Licensing Manager Christine Moriarty (Manager Moriarty) presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals and Responsible Vendor Training Renewal Licenses.

1. Commonwealth Alternative Care, Inc.

- Commissioner Concepcion moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

2. Leaf Lux Group Inc.

- Commissioner Roy moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

VI. Staff Recommendations on Renewal Licenses – 03:02:59

- Commissioner Concepcion moved to approve the renewal of items numbered 1 – 25 as indicated on the agenda.



- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the renewal of items numbered 1 – 25 as indicated on the agenda.

VII. Staff Recommendations on Responsible Vendor Training Renewal Licenses – 03:04:09

1. Acta LLC (#DCCR794121)
 - Commissioner Roy moved to approve the Responsible Vendor Training License Renewal.
 - Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Responsible Vendor Training License Renewal.
2. Bartucca Consulting LLC (#DCCR794126)
 - Commissioner Concepcion moved to approve the Responsible Vendor Training License Renewal.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Responsible Vendor Training License Renewal .
3. Grass Ceiling, LLC (#DCCR794125)
 - Commissioner Concepcion moved to approve the Responsible Vendor Training License Renewal.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Responsible Vendor Training License Renewal .

VIII. Enforcement Action – 03:08:25



1. Assured Testing Laboratories, LLC

- EC Goodin presented the proposed Final Order and Stipulated Agreement which followed a Summary Suspension Order issued against Assured Testing Laboratories, LLC. He explained that Enforcement staff had found that from April 1, 2024, through April 15, 2025, the Licensee had conducted testing in a non-compliant manner and had not reported failing results. The stipulated remedies included a fine of \$300,000, a 12-month suspension of the current CEO, a 24-month probationary period and affirmative relief in the form of the immediate cease of all non-compliant operations, an independent audit, submission of revised standard operating procedures (SOPs), the hiring of an internal quality control manager, notification to the Commission of any personnel changes, submission of bi-weekly reports and education on testing and ethics for all staff. Commissioner Roy asked for the specific value of arsenic which had been found in a sample and EC Goodin stated that he would provide her with an update offline. Commissioner Roy asked if the ISO training would include a component on heavy metals. EC Goodin stated that he could not explain the technical aspects of the required trainings, but that they would ensure the Licensee was brought into compliance and GC Chattopadhyay cautioned against speaking to any facts outside of the Stipulated Agreement due to G.L. c. 30A. EC Goodin further clarified that information on effected products were available on the Commission's website and administrative holds had been issued to prevent further sales. Commissioner Roy asked if it would be appropriate to send out a reminder to Cultivators and Marijuana Product Manufacturers that they must report testing failures, and the ED stated that he would.
- Commissioner Concepcion moved to approve the Stipulated Agreement as recommended by Enforcement Counsel for Assured Testing Laboratories, LLC.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

IX. Commission Discussion and Vote – 03:50:13

1. Tier Relegation Update

- Director of Enforcement Training Armond Enos (Director Enos) explained that he had been tasked with developing motion language directing the Enforcement department to consider tier relegation for Cultivators upon renewal. He noted that JD Software would need two weeks to implement this change and suggested that it could take three months to implement the change internally. Chief of Investigations and Enforcement Nomxolisi Jones (Chief Jones) noted that it may take more time and Chief Technology and Innovation Officer Paul Clark (Chief Clark) confirmed that there would be four weeks minimum before the software changes could be implemented. Chief Jones suggested bringing this topic back at the regular December meeting when staff could inform the board if more time was needed. Commissioners



discussed Director Enos's proposed motion language and agreed to provide 60-day notice to Licensees. The AC requested updates on the topic at future meetings.

- Commissioner Concepcion moved to direct Investigations and Enforcement staff to begin enforcement of 935 Code Mass. Regs. §§ 500.050(2)(d)&(e) and 501.050(2)(d)&(e) with respect to tier relegation beginning January 1, 2026, after providing notice to Licensees of this change in policy at least 60-days before the change takes effect.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 04:41:00.)

2. Legal Intervention Discussion

- GC Chattopadhyay noted the board's previous direction for the Legal department to intervene in the Theory Wellness v. Great Barrington matter. Since that direction, the Commission's motion to intervene had been heard and the judge had not considered it. He explained that he was looking for new matters which could provide an opportunity for the Commission to advocate for its statutory authority to ensure HCA compliance and was seeking a broader direction to intervene in matters which provided an opportunity to do so. Commissioner Roy voiced some reluctance towards a broad direction and GC Chattopadhyay suggested building in a requirement for regular updates to Commissioners and reiterated that the intent was to allow for more flexibility. Commissioner Roy suggested that coordinating intervention with the Attorney General's Office (AGO) could provide an opportunity to update Commissioners and the ED concurred.
- Commissioner Roy moved to direct the GC in consultation with the ED and the AGO, to take all steps necessary to identify and intervene in court cases involving Licensees and municipalities which present issues relating to the Commission's statutory authority and oversight over HCAs and Community Impact Fees (CIFs) and provide timely updates to the Commissioners.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

3. Social Consumption Public Comment Period Memo

- The AC summarized the topic which Commissioners had suggested including in a memorandum to seek feedback from stakeholders on topics which had been debated during the review of the redline Social Consumption regulations. Deputy General Counsel Michael Baker (DGC Baker) summarized the topics which were included in



the document and Commissioner Roy suggested sharing the memorandum with the Cannabis Advisory Board (CAB) and sharing it as an editable PDF so that stakeholders could simply fill in text boxes. Commissioner Concepcion requested an edit to the “Cooling Down – 500.141(12)” section to indicate that it described requirements that may or may not be a part of the final regulations. Commissioner Roy requested that the motion language indicate the date by which the memorandum would be posted.

- Commissioner Roy moved to direct the ED to work with staff to publish this memorandum as discussed by the board on the Commission’s website by August 20, 2025, and perform outreach to all stakeholders including members of the CAB.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

X. New Business Not Anticipated at the Time of Posting – 05:20:20

- The AC stated that there was no new business which was not anticipated at the time of posting.

XI. Next Meeting Date – 05:20:34

- The AC stated that the next meeting was a Public Hearing scheduled for September 8, 2025, in-person at the Worcester headquarters.

XII. Adjournment – 05:23:40

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



Cosmopolitan Dispensary, Inc.
0305-COO-02-1224

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Cosmopolitan Dispensary, Inc.
Licensee d/b/a Name:	N/A

2. License(s) Affected by this Change Request:

License Number	License Type
MR282961	Marijuana Retailer

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

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

Entity	Role
TZIKA Inc.	Entity with Direct or Indirect Control
Sunny Aroustamian Revocable Living Trust	Entity with Direct or Indirect Control

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

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

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

CHANGE OF OWNERSHIP CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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.



Green World, LLC
0306-COO-02-1224

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Green World, LLC
Licensee d/b/a Name:	Green Heart

2. License(s) Affected by this Change Request:

License Number	License Type
MR281939	Marijuana Retailer

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

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

Entity	Role
TZIKA Inc.	Entity with Direct or Indirect Control
Sunny Aroustamian Revocable Living Trust	Entity with Direct or Indirect Control

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

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

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

CHANGE OF OWNERSHIP CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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: OCTOBER 9, 2025

RENEWAL OVERVIEW

1. Name, license number, renewal application number and host community for each Marijuana Establishment presented for renewal:



	Licensee Name	License Number	Renewal Application Number	Host Community	License Status
1	140 Industrial Road, LLC	MP281433	MPR244320	Fitchburg	CO
2	ACMJ, Inc.	MC283322	MCR140956	Holyoke	PL
3	Alternative Therapies Group II, Inc.	MR281344	MRR206952	Salisbury	CO
4	Cedar Roots LLC	MC282746	MCR140957	Ware	CO
5	Curaleaf Massachusetts, Inc.	MP281318	MPR244348	Webster	CO
6	Curaleaf Massachusetts, Inc.	MC281309	MCR140952	Webster	CO
7	Ember Gardens Cape Cod LLC	MR284542	MRR207313	Orleans	CO
8	Four Daughters Compassionate Care, Inc.	MP281715	MPR244356	Sharon	CO
9	Four Daughters Compassionate Care, Inc.	MR281552	MRR207348	Sharon	CO
10	Green Meadows Farm, LLC	MC282409	MCR140761	Southbridge	CO
11	Green Meadows Farm, LLC	MP281763	MPR244185	Southbridge	CO
12	Hennep, Inc.	MR281450	MRR207134	Provincetown	CO
13	High Hopes LLC	MR282161	MRR206989	Hopedale	CO
14	House of Ermias, LLC	MR284346	MRR207341	Chelsea	CO
15	I.N.S.A., Inc.	MR282632	MRR207333	Springfield	CO
16	In Good Health, Inc.	MR284655	MRR207087	Sandwich	CO
17	J - B.A.M., INC.	MC282510	MCR140946	Pittsfield	CO
18	J - B.A.M., INC.	MP282172	MPR244345	Pittsfield	CO
19	Mass Cannabis Growers Cooperative	CO281452	COR129716	Holyoke	PL
20	Massachusetts Green Retail, Inc.	MR284144	MRR207340	Lynn	CO
21	Mayflower Medicinals, Inc.	MR282155	MRR207328	Lowell	CO



22	Mayflower Medicinals, Inc.	MR281256	MRR207334	Worcester	CO
23	Mayflower Medicinals, Inc.	MP281858	MPR244352	Fall River	CO
24	Motah 420 LLC	MP282240	MPR244353	Adams	PL
25	Ocean Breeze Cultivators LLC	MR283656	MRR207360	Gloucester	CO
26	Paper Crane Provisions, LLC	MC283300	MCR140711	Hubbardston	CO
27	SAWF Estate LLC	MR284312	MRR207283	Boston	PL
28	SunnyDayz Inc.	MC283692	MCR140960	Deerfield	PL
29	Surf's Up Cannabis Ventures LLC	MR285057	MRR207279	Boston	PL
30	Trifecta Farms Corp	MC283350	MCR140963	Brimfield	CO
31	Witch City Gardens LLC	MR281663	MRR207352	Salem	CO

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.

RENEWAL CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.



MARIJUANA LICENSE RENEWAL CONDITION EXECUTIVE SUMMARY COMMISSION MEETING: OCTOBER 9, 2025

LICENSING RENEWAL CONDITION OVERVIEW

1. New Dia Fenway LLC (MRR207158)
 - Condition(s) placed on May 8, 2025
 - The due date for the condition was set for June 7, 2025
 - Follow-up emails were sent on June 11, 2025, and August 12, 2025
 - Details of Condition(s):
 1. Within thirty business days of approval of Application for Renewal, contact CCC Licensing Division and provide a response to clarify goals and implementation identified in Diversity Plan 2024-2025 uploaded on 2/21/2025 in accordance with 935 Code Mass. Regs. § 500.103(4)(b).
2. GreenSoul Organics, Inc. (MRR207239)
 - Condition placed on June 12, 2025
 - The due date for the condition was set for July 12, 2025
 - Follow-up emails were sent on July 11, 2025, and August 12, 2025
 - Details of Condition:
 1. Within thirty business days of approval of Application for Renewal, contact CCC Licensing Division to provide a response on current progress toward goals in Diversity Plan in accordance with 935 Code Mass. Regs. § 500.103(4)(b) and 935 Code Mass. Regs. § 500.101(1)(c)8k.



Tower Three, LLC
MP281783

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Tower Three, LLC
Licensed Location:	30 Sherwood Drive, Taunton, MA 02780

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

License Type(s) Sought:
Marijuana Product Manufacturer

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

Type	Status	Location
Marijuana Cultivator, Tier 2/Indoor (5,001-10,000 sq. ft.)	Commence Operations	Taunton

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 19, 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. Product Manufacturing Operation

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

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

- d. Transportation

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

FINAL LICENSE CONDITIONS

Commission staff has reviewed the license for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.



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

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

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



Uproot, LLC
MD1344

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Uproot, LLC
Licensed Location:	41 Fremont Street, Worcester, MA 01603

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

License Type(s) Sought:
Marijuana Delivery Operator

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

Type	Status	Location
Marijuana Microbusiness (Cultivation and Product Manufacturing)	Commence Operations	Worcester

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 10, 2025.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

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

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

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

FINAL LICENSE CONDITIONS

Commission staff has reviewed the license for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.



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

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

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



Canna-Farm LLC
MCN283953

APPLICATION OF INTENT REVIEW

1. Name, address, and license type(s) sought of the proposed License Applicant:

License Applicant Business Name:	Canna-Farm, LLC
Proposed Location:	331 Turner Street, 2 nd Floor, Attleboro, MA 02703

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

License Type(s) Sought:
Marijuana Cultivator, Tier 5, Indoor, (30,001 – 40,000 sq. ft.)

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

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

4. List of all required individuals and their roles:

Individual	Role
Xue Li	Person Having Direct/Indirect Control

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

6. License Applicant's Status:

General Applicant

7. The license applicant and host community executed a Host Community Agreement ("HCA") on March 4, 2025. The license applicant submitted or resubmitted their application on or after March 1, 2024 and provided a compliant HCA that was certified by Commission staff pursuant to 935 CMR 500.180(3) and/or comparable medical regulations.
8. The Commission received a municipal response from the host community on June 25, 2025 stating the applicant was in compliance with all local ordinances or by-laws.



9. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposes to hire individuals from the following Commission identified Areas of Disproportionate Impact: 15% from Mansfield, 15% from Walpole, and 20% and Massachusetts residents who have, or have parents or spouses who have, past drug convictions; and/or certified Economic Empowerment Recipients or Social Equity Program Participants
2	The license applicant proposed provide educational programs and informational sessions geared towards individuals from the Target Areas and/or Massachusetts Residents who have, or have parents or spouses who have, past drug convictions, and/or certified Economic Empowerment Recipients that are interested in the cannabis industry, with specific focuses on marijuana cultivators, product manufactures, and entrepreneurship, at least twice a year.

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

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

#	Goal
1	The license applicant proposes to hire the following: 50% Women, 50% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.
2	The license applicant proposed to ensure 100% of its employees receive training on diversity and sensitivity.

PROVISIONAL LICENSE CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.



1. Provisional licensure is subject to the payment of the appropriate license fee within 90 days of an affirmative vote of the Commission pursuant to 935 CMR 500.103(1)(e) and 935 CMR 501.103(1)(d)
2. Provisional licensure does not allow the license holder to cultivate, manufacture, or possess marijuana and/or marijuana infused products (MIPs) prior to being approved for a final license.



WildWeeds Corp
MBN282540

APPLICATION OF INTENT REVIEW

1. Name, address, and license type(s) sought of the proposed License Applicant:

License Applicant Business Name:	WildWeeds Corp
Proposed Location:	1 Cabot St, Ste WW, Holyoke, MA 01040

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

License Type(s) Sought:
Marijuana Microbusiness (Cultivation and Product Manufacturing)

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

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

4. List of all required individuals and their roles:

Individual	Role
Olga Rosario	Person Having Direct/Indirect Control

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

6. License Applicant's Status:

Expedited Applicant (Social Equity Program Participant)
Olga Rosario / 100% ownership / SE303597)

7. The license applicant and host community executed a Host Community Agreement ("HCA") on April 8, 2025. The license applicant submitted or resubmitted their application on or after March 1, 2024 and provided a compliant HCA Waiver that was certified by Commission staff pursuant to 935 CMR 500.180(3) and/or comparable medical regulations.
8. The Commission received a municipal response from the host community on September 12, 2025 stating the applicant was in compliance with all local ordinances or by-laws.



9. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposes to hire 50% of individuals from the following Commission identified Areas of Disproportionate Impact: Holyoke.
2	The license applicant proposes to form partnerships with at least one (1) SE owned ancillary business annually and one SE-owned operating licensee.

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

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

#	Goal
1	The license applicant proposes to hire the following: 40% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.
2	Engage with at least one (1) supplier of a company that is woman, veteran, People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, LGBTQ+ and Persons with Disabilities-owned business.
3	The license applicant proposed to promote at least 50% of employees who are People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; Women; Veterans; People with Disabilities; and People who identify as LGBTQ+

PROVISIONAL LICENSE CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.



1. Provisional licensure is subject to the payment of the appropriate license fee within 90 days of an affirmative vote of the Commission pursuant to 935 CMR 500.103(1)(e) and 935 CMR 501.103(1)(d)
2. Provisional licensure does not allow the license holder to cultivate, manufacture, or possess marijuana and/or marijuana infused products (MIPs) prior to being approved for a final license.



**Online Training Providers LLC (DBA Cannabis Training
University, CTU, Online Cannabis Education, OCE)
RVN453966**

RESPONSIBLE VENDOR TRAINING (“RVT”) APPLICANT SUMMARY

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

Item	Information
RVT Applicant Name	Online Training Providers LLC
RVT Applicant d/b/a Name	Cannabis Training University, CTU, Online Cannabis Education, OCE
RVT Address	1317 Edgewater Drive #221, Orlando, FL 32804
RVT Business Phone Number	(844) 484-3288
RVT Business Email Address	support@thectu.com
RVT Business Website	www.cannabistraininguniversity.com

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

Individual	Role
Jeffrey Zorn	Owner

OVERVIEW OF PROPOSED TRAINING PROGRAM

4. The RVT applicant’s proposed program will be presented in a virtual format model.
5. The RVT applicant has demonstrated the following:
- Verify the identification and certify completion of the program for each agent;
 - Track trainees' time needed to complete the course training;
 - Allow the trainees to ask questions of the RVT trainer; and
 - Evaluate each trainee's proficiency with course material.



6. The RVT applicant described its plan to maintain its training records at its principal place of business including length of time for retention.
7. The RVT applicant outlined the attendees its training program intends to target, its recruitment approach, and the objectives of its training program.

PROPOSED COURSE MATERIALS AND ATTACHMENTS

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

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

RESPONSIBLE VENDOR TRAINING CONDITIONS

Commission staff has reviewed the RVT application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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



Cannabis Trainers

RVR453160

RESPONSIBLE VENDOR TRAINING (“RVT”) TRAINER RENEWAL SUMMARY

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

Item	Information
RVT Trainer Name	Cannabis Trainers
RVT Certification Number	RVR453160/RV453121
RVT Trainer d/b/a Name	N/A
RVT Address	2745 w 35 th Avenue, Denver, CO 80211
RVT Business Phone Number	(303) 931-1111
RVT Business Email Address	maureen@cannabistrainers.com
RVT Business Website	www.CannabisTrainers.com

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

Individual	Role
Maureen McNamara	Owner

OVERVIEW OF TRAINING PROGRAM

4. The RVT trainer was originally certified on October 11, 2019. Since that time, or the time of its last renewal, the RVT trainer has provided instructions to 4,160 Marijuana Establishment and Medical Marijuana Treatment Center agents.
5. The RVT trainer’s program is presented in a virtual format model.
6. The RVT trainer has continued to demonstrate the following:
 - a. Verify the identification and certify completion of the RVT program for each agent;
 - b. Track trainees' time needed to complete the course training;
 - c. Allow the trainees to ask questions of the RVT trainer; and
 - d. To evaluate each trainee's proficiency with course material.



RECOMMENDATION

Commission staff has reviewed the RVT application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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

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



Medical Marijuana 411 (MM411, Inc) RVR453155

RESPONSIBLE VENDOR TRAINING (“RVT”) TRAINER RENEWAL SUMMARY

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

Item	Information
RVT Trainer Name	Medical Marijuana 411 (MM411, Inc)
RVT Certification Number	RVR453155/RV453292
RVT Trainer d/b/a Name	N/A
RVT Address	2434 Lenore Drive, Tacoma, WA 98406
RVT Business Phone Number	(253) 970-5888
RVT Business Email Address	chris@medicalmarijuana411.com
RVT Business Website	www.medicalmarijuana411.com

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

Individual	Role
Christine Nazarenus	Owner

OVERVIEW OF TRAINING PROGRAM

4. The RVT trainer was originally certified on September 22, 2020. Since that time, or the time of its last renewal, the RVT trainer has provided instructions to 256 Marijuana Establishment and Medical Marijuana Treatment Center agents.
5. The RVT trainer’s program is presented in a virtual format model.
6. The RVT trainer has continued to demonstrate the following:
 - a. Verify the identification and certify completion of the RVT program for each agent;
 - b. Track trainees' time needed to complete the course training;
 - c. Allow the trainees to ask questions of the RVT trainer; and
 - d. To evaluate each trainee's proficiency with course material.



RECOMMENDATION

Commission staff has reviewed the RVT application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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

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



Stoker Consulting LLC
RVR453154

RESPONSIBLE VENDOR TRAINING (“RVT”) TRAINER RENEWAL SUMMARY

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

Item	Information
RVT Trainer Name	Stoker Consulting LLC
RVT Certification Number	RVR453154/RV453141
RVT Trainer d/b/a Name	N/A
RVT Address	35 Fifer Lane, Lexington, MA 02420
RVT Business Phone Number	(617) 620-9992
RVT Business Email Address	rick@stokercompliance.com
RVT Business Website	www.stokercompliance.com

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

Individual	Role
Richard Gilbert	Owner

OVERVIEW OF TRAINING PROGRAM

4. The RVT trainer was originally certified on October 11, 2019. Since that time, or the time of its last renewal, the RVT trainer has provided instructions to 3,114 Marijuana Establishment and Medical Marijuana Treatment Center agents.
5. The RVT trainer’s program is presented in a virtual format model.
6. The RVT trainer has continued to demonstrate the following:
- Verify the identification and certify completion of the RVT program for each agent;
 - Track trainees' time needed to complete the course training;
 - Allow the trainees to ask questions of the RVT trainer; and
 - To evaluate each trainee's proficiency with course material.



RECOMMENDATION

Commission staff has reviewed the RVT application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

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

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



COMMONWEALTH OF MASSACHUSETTS

WORCESTER COUNTY

CANNABIS CONTROL COMMISSION

IN THE MATTER OF

Elev8 Cannabis Inc.

License No. MR281810
License No. MR282630
License No. MR281383

CCC-HO-23-0001

(Enforcement Case No. ENF-2022-1336)

RECOMMENDED DECISION

I. Summary of Decision

This matter involves a Motion for Default Judgment and Summary Decision filed by the Cannabis Control Commission (“Commission”) in the matter of Elev8 Cannabis, Inc. (“Elev8”) (Enforcement Case No. ENF-2022-1336), which has been assigned the docket number CCC-HO-23-0001 for the purpose of proceedings before the Commission’s Hearing Officer. On October 31, 2023, the Commission issued an Order to Show Cause (“Order”) to Elev8 to show cause why its final License no. MR281810 and provisional License nos. MR 282630 and MR281383 should not be revoked. The Order stated: “the Commission issues this Order on account of Respondent’s incompetent operation of a Marijuana Establishment, unsuitable conduct posing serious risk to public health, safety, and welfare, pattern of deceiving Commission staff, and repeated failures to take corrective action.”

On January 18, 2024, the Commission filed the Motion for Default Judgment and Summary Decision (“Motion”) at issue here, in which it stated that Elev8 had not timely filing a hearing request and moved: (1) for the facts and evidence alleged in the Order to be deemed as true; (2) for a default judgment to be entered against Elev8; (3) for a recommendation of license

revocation of for all of Elev8's licenses be made to the Commission; and (4) for other relief deemed equitable and just.

I recommend that the Commission revoke Elev8's final License no. MR281810 effective March 25, 2023 and take no action with respect to Provisional License Nos. MR282630 and MR281383, which were never actually issued.

II. Authority and Jurisdiction

Pursuant to M.G.L. c. 94G, § 4(a)(xxiv) and (g), the Commission may conduct adjudicatory proceedings in accordance with M.G.L. c. 30A and the Standard Adjudicatory Rules of Practice and Procedure established pursuant to section nine of M.G.L. c. 30A. Commission regulations provide that a Licensee shall be afforded a hearing on any adverse action taken pursuant to 935 CMR 500.370 and that the Commission shall designate a Hearing Officer or delegate this designation to the Executive Director. 935 CMR 500.500(2)(b) and (5). The Hearing Officer will make a recommended decision to the Commission. 935 CMR 500.500(11).

III. Procedural History

The procedural history in this matter is summarized below.

March 24, 2023 Summary Suspension Order

On March 24, 2023, the Commission, through its Executive Director, issued a Summary Suspension Order to Elev8 pursuant to G.L. c. 94G, §§ 4(a)(xi) and (a1/2)(xi) and 935 CMR 500.350, in which it required the immediate suspension of License Nos. MR281810, MR282630, and MR281383, the immediate suspension of all agent registrations associated with Elev8, and cessation of all licensed operations. The Summary Suspension Order stated that the Commission had determined that Elev8, through the acts of its owner, posed an immediate or serious threat to the public health, safety, or welfare. The Summary Suspension Order said that it would take effect on March 25, 2023 at 12:00 a.m.

October 31, 2023 Order to Show Cause

On October 31, 2023, the Commission, through its Executive Director and pursuant to its authority under G.L. 94G, §§ 4(a)(xi) and (a1/2)(xi) and 935 CMR 500.370, issued an Order to Show Cause (“Order”) to Elev8, ordering it to show cause why its final License No. MR281810 and provisional License Nos. MR282630 and MR281383 should not be revoked. The Order stated: “the Commission issues this Order on account of Respondent’s incompetent operation of a Marijuana Establishment, unsuitable conduct posing serious risk to public health, safety, and welfare, pattern of deceiving Commission staff, and repeated failures to take corrective action.”

The Order provided that, pursuant to 935 CMR 500.500, Respondent (i.e., Elev8) could request a hearing no later than 30 calendar days from the date of the Order, and it provided an email address to which any hearing request should be sent. The Order further stated that any hearing would be conducted pursuant to G.L. 30A and the Formal Rules of Adjudicatory Practice and Procedure (“Formal Rules”), 801 CMR 1.01. Elev8 did not submit a hearing request in the timeframe specified in the Order.

January 18, 2024 Motion for Default Judgment and Summary Decision

On January 18, 2024, the Commission, through its Enforcement Counsel, moved for an entry of default judgment and summary decision based on Elev8’s failure to timely request a hearing, citing several of its own regulations, 935 CMR 500.500(4), 935 CMR 500.500(6)(b), and 935 CMR 500.500(6)(c) and two provisions in the Formal Rules, 801 CMR 1.01(7)(g)(2) and 1.01(7)(h). Elev8 did not respond to the Commission’s January 18, 2024 Motion for Default Judgment and Summary Decision.

August 6, 2025 Order Requesting Information and Briefing and the Parties’ Responses

On August 6, 2025, I issued an Order to the parties in which I requested that the Commission’s Enforcement Counsel provide the following information: (1) the current status of license MR281810, including the date of any expiration; (2) the current status of license MR282630, including the date of any expiration; and (3) the current status of license MR281383, including the date of any expiration. The Order stated: “The parties are expressly advised that the

information provided by the Commission in response to my request, including any supporting documentation, may be incorporated as facts in any Recommended Decision I issue on the Commission's January 18, 2024 Motion."

In addition, pursuant to my authority under 801 CMR 1.01(10)(j), which authorizes a hearing officer to request hearing briefs, I invited the parties to submit briefing on the following issue:

Whether, if there were grounds for revocation of licenses that have since expired and have not been renewed, I should: recommend to the Commission that such licenses be revoked; recommend to the Commission that it issue a declaration stating that it had grounds to revoke the licenses before they expired; or make some other recommendation to the Commission.

The Commission's Enforcement Counsel submitted a response to my August 6, 2025 Order on August 19, 2025 that provided the requested information and briefing. Elev8 submitted a response on August 13, 2025 that did not provide briefing on the matters specified in my August 6, 2025 Order, but rather addressed the allegations and counts in the underlying October 31, 2023 Order to Show Cause.

Ex Parte Communication

I note for the record that when I initially sent the August 6, 2025 Order to Elev8, my email bounced back as undeliverable. I then asked the Commission's Enforcement Counsel whether they had alternative addresses for Elev8, and they provided two additional email addresses. I sent the August 6, 2025 Order to the two new email addresses, and Elev8's owner, Oluwaseun Adedeji responded and then sent an *ex parte* email to me at 8:05 p.m. on Friday, August 8, 2025 that purported to update me on Elev8's application for the Commission's social equity program and asked for a conference call. I responded to this email on Monday, August 11, 2025, copying the Commission's Enforcement Counsel, and informed Mr. Adedeji that the Standard Rules of Adjudicatory Practice and Procedure prohibit *ex parte* communications and instructed him not to contact me without copying the Commission's Enforcement Counsel. Mr. Adedeji's August 8, 2025 *ex parte* communication and my response are in the public record of this adjudicatory proceeding, and pursuant to 801 CMR 1.03(a)(1)(b)(iv), I hereby state that, in my opinion, my

receipt of the *ex parte* communication does not disqualify me from further participation in the adjudicatory proceeding.

IV. Analysis, Findings of Fact, and Recommendations

The Commission has framed its January 14, 2024 filing as a Motion for Default Judgment and Summary Decision. Reviewing the Commission’s regulations and the Formal Rules, 801 CMR 1.01, I am instead going to treat the January 14, 2024 filing as a request that, pursuant to the Commission’s “Waiver” provision at 935 CMR 500.500(6)(a) (hereinafter referred to as “the Waiver provision”), which applies when a Licensee “fails to request a hearing in a timely manner or otherwise waives their right to a hearing,” I assume the truth of the allegations set forth in the October 31, 2023 Order to Show Cause and recommend to the Commission disciplinary action(s), sanction(s), or fine(s) or an informal disposition of the matter.

This reframing of the Commission’s request does not alter the relief requested by the Commission, but rather changes the citations undergirding the Commission’s Motion to hew more closely to the situation at hand. There is a “Default” provision in the Commission’s regulations (935 CMR 500.500(6)(b)), which the Commission cited in its Motion and which has identical consequences to the Waiver provision. However, I conclude that the Waiver provision is the appropriate citation for this matter because it pertains specifically to a Licensee’s failure to timely request a hearing, which is the basis for the Commission’s request for relief here.

I also conclude that the Commission’s citations to the “Summary Decision” provisions in its regulations (935 CMR 500.500(6)(c)) and the Formal Rules (801 CMR 1.10(7)(h)) are unnecessary. Those provisions authorize the Hearing Officer to make a summary decision when “there is no genuine issue of material fact,” but the Waiver provision provides the Hearing Officer an independent basis to assume the truth of allegations in a Commission notice and to make disciplinary recommendations to the Commission.¹

¹ I also conclude that 801 CMR 1.01(7)(g), which the Commission cited in its Motion, does not apply. That provision deals with Motions to Dismiss when a party has failed to prosecute or defend a claim. Here, Elev8 never filed a hearing request, which would be the equivalent of a “claim for adjudicatory proceeding” under 801 CMR 1.01(6)(b), so there was no claim that it failed to prosecute or defend.

A. Application of Waiver Provision (935 CMR 500.500(6)(a))

The first question is whether, in this situation, there has been a waiver pursuant to the Waiver provision. I conclude that there has been. The full Waiver provision states: “If a Licensee, Registrant, or Host Community fails to request a hearing in a timely manner or otherwise waives their right to a hearing, the Hearing Officer may assume the truth of the allegations set forth in the notice and recommend to the Commission disciplinary action(s), sanction(s) or fine(s) or an informal disposition of the matter.” 935 CMR 500.500(6).

Under the Commission regulations, a hearing request must be submitted no later than 30 days the effective date of the notice. 935 CMR 500.500(4). Consistent with the regulations, the October 31, 2023 Order stated in bold that if the Respondent elected to pursue its hearing right, it had to submit a hearing request by email to the Commission within 30 days of the date of the Order. Since Elev8 did not timely submit a hearing request, I conclude that the Waiver provision applies and that I may assume the truth of the factual allegations in the Order and recommend disciplinary action to the Commission.

B. Findings of Fact

The next question is whether, given my authority under the Waiver provision to assume the factual allegations in the Order to be true, I should do so. I have decided to assume the truth of the factual allegations in the Order, except for certain allegations relating to Elev8’s provisional licenses, Nos. MR282630 and MR281382 (collectively, “the provisional licenses”).

The October 31, 2023 Order to Show Cause stated that Elev8 held two provisional licenses, and it sought their revocation. Order to Show Cause, ¶ 7. However, in its August 19, 2025 response to my August 6, 2025 Order requesting information and briefing, which I hereby admit into evidence as Exhibit A (including attachments A1-A6), the Commission’s Enforcement Counsel informed me that the provisional licenses were never actually issued because Elev8 did not pay the initial license fees within 90 days of approval, as required by 935 CMR 500.103(1)(e). Ex. A at 2. Because Enforcement Counsel’s August 19, 2025 response contains new, and presumably

accurate, information about the provisional licenses, I decline to assume the truth of the factual allegations concerning the provisional licenses in the October 31, 2023 Order to Show Cause.

I hereby make the following Findings of Fact, assuming the allegations in the October 31, 2023 Order to Show Cause to be true, with the exception of the allegations concerning the provisional licenses²:

1. Respondent is an adult-use Marijuana Retailer located at 243 Main Street, Athol, Massachusetts 01331, with a final license to purchase, deliver, sell or otherwise transfer Marijuana to Marijuana Establishments and to customers under License no. MR281810 (the “Athol store”). ~~Respondent also holds two provisional Marijuana Retail licenses, License nos. MR281383 and MR282630;~~
2. In 2018 and 2019, Respondent sought licensure to operate Marijuana retail stores in Athol, Williamstown, and Orange, Massachusetts;
3. The Commission approved Respondent for three provisional retail licenses and on September 10, 2020, the Commission issued Respondent a final license to operate the Athol store;
4. Operations at the Athol store commenced on October 15, 2020;
5. In each application for licensure, Respondent disclosed Oluwaseun Adedeji (“Adedeji”) as a Person Having Direct or Indirect Control over Respondent’s establishments. Specifically, Adedeji holds a 93.12% equity interest in the Athol store, and an 87% equity interest in the prospective Williamstown and Orange establishments;
6. Adedeji is Respondent’s founder and Chief Executive Officer (CEO). He is also the founder and CEO of another Marijuana retail business named Elev8 Cannabis, Inc., located in Eugene, Oregon;
7. During June 1, 2022–March 24, 2023 Respondent had a total of 21 individuals registered as Marijuana Establishment Agents (“Agents”) at its Athol store;
8. After June 8, 2022 until on or around March 4, 2023, Respondent stopped accurately identifying the individual Agents making sales of Marijuana or Marijuana Products in

² These Findings of Fact are all taken directly from the October 31, 2023 Order to Show Cause, except that I struck through allegations concerning the provisional licenses that I am not adopting as part of the Findings of Fact. The Enforcement exhibits referenced in the Findings of Fact are attached hereto as Exhibits B-1-9 (i.e., Enforcement Exhibit 1 is Exhibit B-1 here). The video referenced as Exhibit B-10 will be made available through a separate link.

its Metrc records. During this time Respondent made 11,144 sales according to its Metrc records;

9. On or around July 26, 2022, Adedeji started sleeping at the Athol store;
10. On or around July 30, 2022, the General Manager of the Athol store (“General Manager #1”) quit after working with Adedeji for two days, claiming that Adedeji was hostile, accusatory, and verbally harassed staff;
11. Respondent did not surrender General Manager #1’s agent registration until September 5, 2022;
12. On August 4, 2022, Respondent’s staff walked out of the Athol store claiming that Adedeji created an unsafe and hostile work environment. Audio from video recordings on August 4, 2022, reveal an argument between Adedeji and staff regarding an employee sitting while checking identification. In the recording, one of the employees calls and speaks with someone and afterwards the employee can be heard instructing staff to leave;
13. On August 8, 2022, Adedeji held a virtual meeting with staff. At the meeting, Adedeji purportedly apologized for his actions, promised that he would report himself to the Commission, would stop sleeping at the store, and would leave the store in the hours before the opening shift arrived;

First Closure of the Athol Store and Athol Police Department Responses

14. On August 8, 2022, Adedeji informed the Commission’s Investigations staff, that “we flew in to [sic] mass to visit our Athol store but have since decided to stay in +/- 8 months to help our team, due to them being short staffed.” Adedeji claimed that he “worked late night and crashed at the shop.” He further told Investigations staff: “+/- 08/08/2022 sleeping at shop has ended”;
15. Adedeji continued to sleep at the Athol store after August 8, 2022;
16. According to Respondent’s Metrc sales records, General Manager #1 continued to make sales of Marijuana during July 31, 2022–August 15, 2022, a total of 803 Marijuana sales transactions, despite having quit on or around July 30, 2022. This action is part of a pattern or practice of Respondent improperly entering records into Metrc under the identity of former employees;
17. On August 12, 2022, Investigations staff issued a Notice of Deficiency (NOD) (the “First NOD”) to Respondent, attached as Enforcement Exhibit 1, citing two violations relating to incidents of Adedeji sleeping at the Athol store;
18. On August 14, 2022 at 4:21 PM, in a WhatsApp message one of Respondent’s

employees (“Employee #1”) said, “I had a customer come in today saying she saw you outside smoking a joint by the dumpster” “we’re [sic] you doing that [Adedeji]?” Adedeji responded “[Employee #1] – God bless”;

19. On August 14, 2022 at 9:38 PM, a caller reported to the Athol police department (herein, “Athol PD”) that they “saw a male party go into [Respondent’s facility] and they are closed.” Athol PD dispatched officers to the Athol store who found Adedeji at the store and spoke with him;
20. Respondent did not notify the Commission of the Athol PD response to the Athol store within 24 hours or submit an incident report within 10 days;
21. On August 16, 2022, Adedeji emailed Investigations staff and stated: “we will be closing our shop temporarily, our goal is to use this time to find good people to join our small business”;
22. On August 16, 2022, the Commission received reports from an employee that Adedeji continued to sleep at the Athol store, contrary to his prior statements to Commission investigators;
23. After August 16, 2022, the Commission received additional reports that Adedeji had yelled at employees and vendors and had threatened to fire employees when they spoke up about his noncompliant actions. One employee was fired by Adedeji via WhatsApp on August 14, 2022;
24. On August 17, 2022, an individual identifying as one of Respondent’s Human Resources employees informed Commission investigators that the Athol store would be temporary closing effective that day (the “First Closure”);
25. At the time of Respondent’s notification, the Human Resources employee was not a Registered Marijuana Establishment Agent. Respondent did not register them as an agent until August 26, 2022;
26. Leading up to and on the day of the First Closure, 7 registered Agents—all of Respondent’s staff at the time including General Manager #1 and Employee #1—had either quit or had been fired by Adedeji;
27. On August 20, 2022, Respondent submitted a Plan of Correction (POC) to Investigations staff in response to the First NOD, attached as Enforcement Exhibit 2. As corrective measures to address him sleeping at the Athol store, Adedeji stated that he would require “all staff to exit the premises no later than 1 hour after the closure of the retail establishment for the day” and that “any staff found in violation of this use of premises rule will be immediately dismissed from employment”;
28. On August 23, 2022 at 6:46 AM, Respondent’s third-party security vendor, American Alarm, notified the Athol PD of burglar alarm activation at the Athol store. Athol PD

dispatched officers to the Athol store;

29. Respondent did not notify the Commission of the Athol PD response to the Athol store within 24 hours nor submit an incident report within 10 days;
30. On August 24, 2022, Investigations staff directed Respondent to retain all video footage beginning July 24, 2022 at 12:00 AM until further notice. Adedeji confirmed receipt of the request on August 25, 2022, and affirmed that Respondent would work with American Alarm to comply with the request. Respondent was later unable to produce the same video surveillance footage when requested by Commission investigators on January 11, 2023;
31. On September 3, 2022, at 9:23 AM, one of Respondent's former budtenders ("Employee #2") called the Athol PD and requested to speak with an officer regarding alleged harassment by Adedeji. Twelve minutes later, at 9:35 AM, Employee #2 called the Athol PD again and reported that Adedeji "entered the [Cumberland Farms] store trying to go after him." Athol PD dispatched officers to the Cumberland Farms and to the Athol store;
32. Respondent did not notify the Commission of the Athol PD response to the Athol store within 24 hours nor submit an incident report within 10 days;

Unannounced Inspection and Communications with Mr. Adedeji

33. On September 6, 2022, Commission investigators conducted an announced inspection of the Athol store with the Building Commissioner for the Town of Athol;
34. During the inspection, Commission investigators requested inventory records from Respondent. Respondent failed to produce monthly inventory reports for July 2022 and August 2022. Respondent's inventory records for the month of September 2022 did not include a summary of its inventory or the names, signatures, or titles of the individuals who conducted its inventory;
35. Commission investigators also audited the Athol store's inventory starting from September 4, 2022 and observed 26 Metrc Package records that had reported a higher virtual quantity of Marijuana than the quantity of Marijuana physically present at the Athol store. Respondent's Metrc records illustrated that, to reconcile this discrepancy, Respondent had manually reduced the reported quantity of Marijuana in Metrc (*i.e.*, negatively adjusted the product package) for 26 packages of Marijuana Product, identified in Enforcement Exhibit 3;
36. In its Metrc record, Respondent characterized the Marijuana Product package adjustments as an "entry error" and cited an "inventory audit" from September 4, 2022 as the reason for making these adjustments;

37. While reviewing video surveillance footage of the licensed Premises, Commission investigators asked Adedeji if the Athol PD had responded to the Athol store. Adedeji replied that the Athol PD responded to false alarm activations at the Athol store in August and again on September 3, 2022, which was untrue;
38. While touring the Athol store, Commission investigators observed Respondent's exterior dumpster was unlocked and contained Marijuana and packaged Edibles that had been disposed intact, before being sufficiently ground to render them unusable;
39. On September 8, 2022, Investigations staff issued Respondent an NOD (the "Second NOD"), attached as Enforcement Exhibit 3, detailing seven violations, including Respondent's failure to maintain a real-time inventory of Marijuana and Marijuana Products at its facility, to secure its waste, and to notify the Commission of inventory discrepancies and incidents requiring law enforcement dispatch to the Athol store;
40. On September 8, 2022, Respondent registered a new General Manager ("General Manager #2") as an Agent;
41. On September 21, 2022, in a call with Investigations staff, Adedeji evasively claimed that the Athol PD had come to the Athol store on September 3, 2022 because the business pays taxes;
42. On September 22, 2023, Respondent registered Employee #3 as an Agent;
43. On September 22, 2022, Respondent submitted a POC to Investigations staff for the Second NOD, attached as Enforcement Exhibit 4. In the POC, Respondent stated that it planned to retrain all individuals responsible for conducting inventory and that a new General Manager had been added to the team who would undergo an 8-hour training, ensure the dumpster would always be locked by conducting daily walk-throughs, and would inform the Commission of inventory discrepancies and incident reports. The POC also stated "Alarm codes were updated. Used previous code severally [sic] which triggered the Alarm";
44. During August 25, 2022–September 23, 2022, Respondent hired and registered 7 new employees as Agents, including General Manager #2 and Employee #3;
45. On September 26, 2022, Investigations staff notified Respondent that the Investigations and Enforcement department ("Enforcement") had rejected portions of the POC related to incident reporting of inventory discrepancies and events compelling response by the Athol PD had been rejected. Enforcement's notice gave Respondent until October 3, 2022 to submit an amended POC;
46. Respondent failed to submit an amended POC by October 3, 2022;
47. On September 30, 2022, Investigations staff issued Respondent an NOD (the "Third NOD"), attached as Enforcement Exhibit 5, for failing to submit an incident report to

the Commission within 10 calendar days following the Athol PD's dispatch to the Athol store on September 3, 2022;

Reopening, Second Closure, and Additional Athol Police Department Responses to the Athol store

48. On September 30, 2022, Respondent reopened for business. Metrc records confirm that Respondent started making sales of Marijuana and Marijuana Products on September 30, 2022 after zero sales during August 15, 2022–September 29, 2022;
49. On October 1, 2022, General Manager #2 provided an explanation to Investigations staff resolving one of the 26 Metrc packages that had been incorrectly adjusted by Adedeji on September 4, 2022, and had been identified as a deficiency in the Second NOD;
50. Adedeji subsequently instructed General Manager #2 to lie to the Commission by telling its investigators that General Manager #1 and other former staff had been responsible for missing inventory from the outstanding 25 discrepant Metrc packages;
51. Metrc records indicate that Respondent stopped making sales of Marijuana and Marijuana Products after October 2, 2022 (the “Second Closure”);
52. On October 2, 2022 at 7:47 PM, Athol PD dispatched officers to the Athol store after receiving a request to conduct a health and welfare check on Adedeji;
53. Respondent did not notify the Commission of the Athol PD response to the Athol store within 24 hours nor submit an incident report within 10 days;
54. On October 3, 2022 at 11:14 AM, American Alarm notified the Athol PD that someone at the Athol store had set off the panic alarm. Athol PD dispatched officers to the Athol store. When they arrived, Adedeji started yelling at them. Officers reported that they had spoken with General Manager #2, Employee #3 and Adedeji, and had been told that Adedeji had threatened to kill General Manager #2;
55. On October 3, 2022, Investigations staff received reports that Adedeji had threatened General Manager #2 with physical harm and fired them. Investigations staff also received reports that Adedeji was hiding things from the Commission, such as concealing missing product by reporting that it had been destroyed, having employees work before being registered, and continuing to sleep at the Athol store;
56. On October 5, 2022 between 3:07 AM and 10:02 AM, Adedeji sent 31 emails to 9 members of Respondent's staff in both Oregon and Massachusetts. In the emails, Adedeji referred to himself as “king” and told staff that monetary fines and missing money would be taken out of the General Managers' paychecks. Respondent's General Manager in Oregon explained that Adedeji could not legally take that action. In response, Adedeji called them “bitch”, “ugly boy”, and “rat” throughout multiple emails and expressed disdain at team members for telling him “what the fuck” he

could do with his own company. Adedeji used the term “rat” or a rat emoji nine separate times in his emails. Adedeji also demoted the Oregon General Manager and auctioned off the position to staff who were copied on the email thread;

57. On October 5, 2022 at 12:03 PM, Adedeji emailed Investigations staff saying “[p]olice was at our location. Yesterday and today. We’ve been traumatize [sic]. Elev8 is still closed for business. It’s a rat race. Thank you”;
58. Athol PD does not have a record of dispatching officers to the Athol store on October 4, 2022. However, on October 5, 2022 Athol PD responded to a 911 call from an individual at Athol Town Hall who reported that Adedeji had come into the Town Hall on October 3, 4, and 5 displaying erratic behavior;
59. Approximately 8 hours later, at 8:14 PM, Athol PD responded to multiple calls of an individual playing loud music and yelling across from Town Hall. Officers arrived on scene and observed Adedeji sitting in his vehicle listening to music loudly and dancing;
60. On or around October 5, 2023, all 7 of Respondent’s newly hired and registered Agents, including General Manager #2 and Employee #3, either quit or were fired by Adedeji. Respondent did not surrender General Manager #2 and Employee #3’s agent registration until December 3, 2022 and December 9, 2022, respectively. For the other 5 Agents, Respondent surrendered their Agent registrations on December 3, 2022, December 9, 2022, and January 16, 2023;

Athol Police Department Arrest of Mr. Adedeji

61. On October 6, 2022 at 7:22 AM, Athol PD dispatched officers to a Starbucks parking lot where they discovered Adedeji fully exposed, jumping up and down and yelling that he would kill someone. Adedeji allegedly confronted the Athol PD and was arrested and charged with the felony offense of Open and Gross Lewdness under G.L. c. 272, § 16 as well as the misdemeanor offenses of Disturbing the Peace, Disorderly Conduct, Indecent Exposure, and Wanton Lewd and Lascivious Conduct under G.L. c. 272, § 53;
62. Adedeji informed the police that he resided at the Athol store and provided them with an expired identification from Texas that also listed the Athol store as his residence. Athol PD took Adedeji into custody and the court ordered Adedeji be detained at Franklin County House of Correction. On a petition filed under G.L. c. 123 § 18(a), the court further ordered Adedeji to be involuntarily committed to Bridgewater State Hospital returnable for November 7, 2022;
63. On November 7, 2022, the court arraigned Adedeji and released him subject to pretrial conditions;

64. During a call with Commission investigators on November 7, 2022, Adedeji represented that he had been in the hospital and stated that he planned to reopen the Athol store. Investigators asked Adedeji to inform them before he reopened. Adedeji did not disclose that he had been charged with a felony offense;
65. On January 23, 2023, the Commission notified Adedeji that he had been determined unsuitable on account of his open criminal proceeding for a felony charge under G.L. c. 272, § 16, Criminal Docket no. 2242CR000665. The Commission later rescinded its suitability determination on January 27, 2023, after Adedeji's criminal felony charge was dismissed;

Reopening the Athol store and Correspondence

66. On November 14, 2022, Adedeji sent an email to Investigations staff with the subject line "Elev8 Re Opening Before End of Month" and the content of the email "Thank you God bless you and good luck." Investigations staff responded asking for more information regarding the steps that would be taken to reopen and the anticipated opening date. Adedeji said that he "hired 1+ [Patient Consultants] that will be working alongside [him] and will be opening [their] doors on the +/- 18th" or he would "work the dispensary [himself]." Investigations staff informed Adedeji that he would need to undergo training before acting as a budtender;
67. On November 21, 2022, Operations Manager #1, hired by Respondent on November 18, 2022, submitted a document to Investigations staff, attached as Enforcement Exhibit 6. Among other things, the document provided steps Respondent would be taking to ensure that staff followed Respondent's "return policy" and notified Investigations staff that the Athol PD had responded to the Athol store on September 3, 2022, October 3, 2022, November 9, 2022, and November 18, 2022. Additionally, the document stated that Operations Manager #1 had been at the Athol store with Adedeji when the Athol PD responded on November 18, 2022. Operations Manager #1 was never registered as an Agent;
68. On November 27, 2022, Respondent conducted an audit of its inventory. The audit documentation was deficient, as it did not contain a summary of the findings, or the names, signatures, and titles of the individuals who conducted the inventory;
69. Metrc records indicate that Respondent started making sales of Marijuana and Marijuana Products on November 28, 2022, after a period of zero sales during October 2, 2022– November 27, 2022;
70. On November 28, 2022 at 11:50 AM, security footage from the Athol store show an employee, later identified as Employee #5, checking the identification card of a customer. At the time, Employee #5 was not a registered Agent;
71. On November 28, 2022 at 11:59 AM, security footage from the Athol store show

Employee #4 selling Marijuana to customers. Yet, Metrc records indicate that two pre-rolls were sold during that same time by General Manager #2. At the time of this Metrc entry, General Manager #2 was not employed by Respondent. Screenshots from Respondent's surveillance system from that date and time show that Employee #4 completed the transaction. Employee #4 improperly conducted sales using a Metrc account registered to General Manager #2;

72. According to Respondent's Metrc sales records, General Manager #2 continued to make sales of Marijuana during November 28, 2022–December 3, 2022, a total of 210 Marijuana sales transactions. General Manager #2 was not employed by Respondent during this time, having quit on or around October 5, 2022. Respondent had improperly conducted sales using a Metrc account registered to General Manager #2;
73. On December 1, 2022, Investigations staff requested a current roster of Respondent's employees including dates of hire, dates of registration, and training records. Operations Manager #1 responded with the requested information and indicated that Metrc training and Responsible Vendor Training was in progress for Operations Manager #1, Employee #4, and Employee #5;
74. During November 25, 2022–December 29, 2022, Respondent hired 5 employees, including Operations Manager #1, Employee #5, and Employee #6. Respondent did not register Operations Manager #1 as an Agent. Operations Manager #1 was hired on November 18, 2022, Employee #5 was hired on November 26, 2022, and Employee #6 was hired on December 29, 2022. Operations Manager #1 and Employee #5 both started working at the Athol store before they were registered as Agents. Operations Manager #1, Employee #4, and Employee #5 all started working at the Athol store before completing minimum training requirements;

Second Unannounced Inspection and Communications

75. On January 11, 2023, Commission investigators conducted an unannounced inspection at the Athol store. Employee #4 and Employee #5 were present at the inspection. Employee #5 told investigators that Adedeji had not been around that day;
76. Investigators conducted an audit of Respondent's physical inventory using a Radio Frequency Identification reader and detected 17 discrepancies between the inventory Respondent input into Metrc and the physical inventory at its facility. Of the 17 discrepancies, 11 packages that had been entered into Metrc could not be physically located, one physical package had a lower quantity of Marijuana than the corresponding quantity reported virtually in Metrc, and 5 packages had negative amounts of Marijuana Products (*i.e.*, Metrc indicated that the amount of physical product at Respondent's facility had already been fully depleted by reaching and surpassing zero quantity). Metrc Package tags are identified in Enforcement Exhibit 7;

77. While inspecting the facility and its premises, Commission investigators observed that Respondent's exterior dumpster was unlocked. This observation followed a prior violation, cited in the second NOD, of Respondent failing to lock its exterior dumpster;
78. Commission investigators requested and reviewed Respondent's monthly inventory audits. Respondent produced its audit for January 2023 and investigators observed that the audit report was deficient, as it did not include a summary of the inventory findings and the names, signatures, or titles of the individuals who conducted the inventory. At the inspection, Respondent provided no documentation of a monthly inventory audit conducted in December 2022. This observation followed a prior violation, cited in the Second NOD, of Respondent failing to have a compliant record of its total inventory;
79. Investigators also requested all personnel files for current staff and found that Respondent did not have compliant personnel records for Employee #4 and Employee #5;
80. While performing a review of live and recorded security footage at the Athol store, Commission investigators observed that one of Respondent's vault cameras was inoperable. As a result, Respondent was unable to produce any security footage for that camera during the period of December 16, 2022–January 11, 2023;
81. Respondent was also unable to produce security footage during July 24, 2022–August 12, 2022 despite Adedeji's prior assurance that Respondent would work with its vendor to obtain the security footage from that time period;
82. In recorded security footage, investigators saw Employee #4 disposing of Marijuana and Marijuana Products on January 3, 2023 alone, without a second Agent in the room;
83. Following the inspection, Commission investigators audited Respondent's Metrc records and discovered that on December 16, 2022, January 7, 2023, and January 10, 2023, Adedeji negatively adjusted Metrc Packages and attributed the need for his adjustment as an "API Related Error" with the note "Code: API Related Error";
84. During a Metrc record audit, investigators observed that Respondent had sold a total of 17 units and 0.3 grams of expired Marijuana and Marijuana Products during December 2, 2022–January 10, 2023;
85. By January 11, 2023, Respondent's amended POCs in response to the Second NOD and Third NOD remained outstanding. Respondent still had not submitted an Incident Report for reportable events that occurred on August 14, 2022, August 23, 2022, and October 2, 2022 even after receiving at least two requests from

Investigations staff;

86. On January 26, 2023, Respondent amended its response to the Second NOD wherein it stated that “upon further investigations [into the inventory discrepancies from September 4, 2022] conducted it was found that select team leaders did not prioritize meeting Commission compliance and were not receptive to criticism. They have since been removed from said position”;
87. On February 2, 2023, Respondent registered a new General Manager (“General Manager #3”) as an Agent. General Manager #3 later told Commission investigators that after he was hired by Adedeji he did not see him at the Athol store until on or around March 3, 2023;

Notice of Intent to Limit Sale, Staff Resignations, and Third Store Closure

88. On February 17, 2023, the Commission’s Investigations and Enforcement department (the “department”), through its Enforcement Counsel, issued a Notice of Intent to Limit Sales of Marijuana and Marijuana Products (the “Notice”) to Respondent, attached as Enforcement Exhibit 8;
89. The Notice identified 10 substantial violations of Commission regulations and mandated Respondent take corrective action to address each of the deficiencies by March 9, 2023. The Notice warned that failure to take corrective action by that date could result in the Commission issuing an order prohibiting Respondent from selling Marijuana and Marijuana Products at its Athol store;
90. After the department issued the Notice, Adedeji took disciplinary action against Employee #4 and Employee #5, who had been identified in the Notice as lacking mandatory training and related records, resulting in their immediate dismissal. Adedeji instructed them to leave all belongings with General Manager #3, including the “Nissan Car Keys, Key Fobs, Laptop and etc.”;
91. On February 23, 2023, Adedeji sent an iPhone audio message as a text message to Investigations staff informing them that he had promoted Employee #6 to serve as Respondent’s interim CEO;
92. On March 8, 2023, Respondent’s staff provided documentation and responses to the Notice, attached as Enforcement Exhibit 9. In its submission, Respondent did not provide adequate personnel records for Employee #4 and Employee #5 and indicated that *the employees* had chosen not to proceed with Respondent moving forward, despite Enforcement receiving reports that they had been fired by Adedeji;
93. Respondent did not explain the inventory discrepancies of January 11, 2023, and stated that adjustments were made to reflect the current state of physical product in Respondent’s vault;

94. Respondent was unable to explain the inventory adjustments from September 4, 2022 as “there are no detailed physical or digital records from previous employees” even though Adedeji had made the adjustments;
95. Respondent stated that it prospectively resolved the tracking of Agent involvement in the distribution of Marijuana or Marijuana Products in Metrc as of March 4, 2023, but was not able to reconcile any of Metrc data for sales during June 8, 2022–March 4, 2023, since it would require the creation of API keys for employees that are no longer working for Respondent;
96. According to Respondent’s Metrc sales records, during December 5, 2022–March 3, 2023, Adedeji made a total of 4,360 Marijuana sales transactions. Of the 4,360 Marijuana sales transactions, 29 were improperly recorded as sales by Adedeji on January 11, 2023, the day Employee #5 told Commission investigators that Adedeji was not around. Additionally, 1,573 of the 4,360 Marijuana sales transactions during February 2, 2023–March 3, 2023, were also improperly attributed to Adedeji, as General Manager #3 indicated that Adedeji had not been at the Athol store since he had been hired. Respondent’s failure to retain Metrc data of individual Agent involvement in the distribution of Marijuana and Marijuana Products was part of a pattern or practice of Respondent improperly entering records into Metrc;
97. Respondent provided written notice of the Athol PD responses to Respondent’s facility on August 14, 2022, August 23, 2022, and October 2, 2022, which were untimely by 207, 198, and 158 days, respectively;
98. In response to the Notice, Respondent also included deficient inventory documentation for the month of February 2023;
99. On March 10, 2023, Adedeji sent an email to Employee #6, General Manager #3, Respondent’s General Manager in Oregon, and another individual who appears to be a consultant (“Consultant #1”). In the email, Adedeji referenced a sexual encounter he allegedly had with one of Respondent’s staff. Employee #6 confronted Adedeji about his behavior, including his disrespect towards female employees. After Employee #6 asked to speak with Adedeji privately, Adedeji barred Employee #6 from entering the Athol facility;
100. Adedeji’s emails and behavior made Respondent’s staff uncomfortable;
101. During February 2, 2023–March 13, 2023, Respondent registered 3 new employees as Agents;
102. On March 14, 2023, Adedeji notified Respondent’s staff that General Manager #3 would be leading Respondent’s expansion in Massachusetts and directed Employee #6 to provide all Standard Operating Procedures (SOPs) to them. Employee #6 responded that Adedeji’s request suggested that the SOPs are finalized, which they

indicated was not the case. Employee #6 wished Adedeji good luck and stated that they are through being sidelined and bullied and are happy to take a back seat. Adedeji responded “good luck [Employee #6], we will miss you”;

103. Employee #6 asked Adedeji to confirm whether they were being fired and if so, to put it in writing. Adedeji responded that they had fired themselves, and when asked again by Employee #6, Adedeji responded with “Last paycheck” multiple times;
104. In a separate email chain on March 14, 2023 which did not include Employee #6, Adedeji informed General Manager #3, the General Manager of Respondent’s Oregon retail store, Consultant #1, and another one of Respondent’s employees that Employee #6 was no longer employed by Respondent;
105. The same day, General Manager #3 resigned in protest of Adedeji’s conduct towards and termination of Employee #6. In their resignation, General Manager #3 cited the lack of structure, constant changes, and Adedeji’s disrespect of women and overall unprofessional behavior;
106. The General Manager of Respondent’s Oregon retail store also informed Adedeji that they and all of Oregon retail staff were also quitting. In their resignation, they cited Metrc issues, compliance issues, and past due invoices with several vendors as grounds;
107. During July 30, 2022–March 22, 2023, Respondent experienced staff attrition causing severe instability at the Athol store;
108. On March 22, 2023, Adedeji informed Investigations staff that “store is closed, we are fully compliant ccc recording regulation. Temporarily closed. Business decision as we charter blue ocean [ocean wave emoji]” (the “Third Closure”);

Mr. Adedeji’s Threats of Violence, Arrest, and Issuance of a Summary Suspension Order

109. On March 23, 2023, Adedeji recorded and posted a five-minute video on his Instagram account, attached as Enforcement Exhibit 10. In the video, Adedeji stated that the Athol store was open for business and indicated that he was there alone, despite telling Investigations staff the day before that the Athol store was temporarily closed. Adedeji then shouted “and for all my old employees, if you step on my fucking property without my permission, bro, on god, you will feel it”;
110. Adedeji continued, “goofy ass people fucking, fucking with my business, don’t ever fuck with my business. Y’all goofy ass boy. I’ll put a bounty on you...on god, if you ever fuck with me. Fuck with my business, Ima dog you. Ima dog you. Ima fuck you, you fuck with my business, I would dog you” and then said “bang, bang” and made a hand gesture imitating a hand gun;

111. Adedeji also yelled “you touch my business, I will kill you.” Adedeji then paused and said “no, boy. I will not kill you. You fuck with me I’m gonna come for your everybody. Your whole family tree” and again imitated the sound of a gun being fired;
112. Adedeji used the phrase “catch these ones” twice, “I will fuck you” numerous times, shouted if he catches anyone he will “dog you”, to not ever disrespect him, and that there “ain’t no way you can run, I will find you and I will dog you”;
113. Adedeji again warned staff not to “come on [his] property if you are not here to work, bitch.” Adedeji also stated “I pay your bills and you got the nerve to disrespect me, bitch. I’ll dog you and everybody else. Disrespect me, hoe” and if “anybody got a problem, pull the fuck up, gang”;
114. On March 23, 2023, the Athol PD arrested Adedeji based on an alleged violation of probation, and he was held at the Franklin County House of Correction to return to the Orange District Court on March 24, 2023;
115. On March 24, 2023, the Orange District Court held Adedeji pending a probation violation hearing. On August 18, 2023, Mr. Adedeji was released having been incarcerated for six months in the Franklin County House of Correction;
116. On March 24, 2023, the Commission issued a Summary Suspension Order immediately suspending all licenses held by Respondent, all agent registrations associated with Respondent and cessation of all licensed operations determining that Respondent, through the acts of Adedeji, posed an immediate or serious threat to the public safety and welfare;
117. On May 1, 2023, the Commission notified Adedeji that he had been determined to be unsuitable on account of his actions on March 22 and 23, 2023 which posed a risk to the public safety and welfare and related to Elev8’s operations;

Respondent’s Current License Status

118. During February and March 2023, Respondent also failed to submit a complete renewal application to the Commission.
119. On February 8, 2023, Respondent submitted a renewal application, Application no. MRR206360, for its Athol retail license;
120. On February 13, 2023, the Commission’s Licensing staff sent a Request for Information (RFI) to Respondent seeking additional information on the license renewal application;
121. On March 2, 2023, Respondent resubmitted its renewal application with no

information or additional documentation responsive to the RFI sent by the Commission's Licensing staff. Licensing responded with a second RFI;

122. On March 9, 2023, Respondent resubmitted its renewal application but still did not provide response documentation to the RFI;

123. Due to Respondent's failure to submit a complete renewal application, its retail license for the Athol store expired on April 10, 2023;

124. On October 17, 2023, the Town of Athol Board of Selectmen unanimously voted to terminate Respondent's Host Community Agreement with the town.

C. Recommended Discipline

The next question is, based on the Findings of Fact, what discipline I should recommend to the Commission. I recommend that the Commission retroactively revoke Elev8's final license MR281810 ("the License"), with an effective revocation date of March 25, 2023. I further recommend that the Commission take no action with respect to the provisional licenses that were never issued (MR282630 and MR281383) because they effectively never existed.

Before explaining the rationale for my recommendation, I note that, pursuant to 935 CMR 500.500(6)(d), I could have conducted an evidentiary hearing on the appropriateness of disciplinary action(s), sanction(s) or fine(s) or an informal disposition of the matter. I chose not to conduct such an evidentiary hearing for two reasons. First, I agreed with the Commission's assertion in its January 18, 2024 Motion that "[b]ased on the facts alleged and seriousness of the violations, to be accepted as truth, revocation of [the License] is the only appropriate sanction and an evidentiary hearing under 935 CMR 500.500(6)(d)." And second, Elev8 never requested a hearing on discipline, as it could have, both in response to the October 31, 2023 Order to Show Cause and the January 18, 2024 Motion.

1. Multiple Grounds for Suspension, Revocation, or Denial of Renewal of Elev8's License under 935 CMR 500.450

The Commission's regulations provide a list of reasons that constitute "full and adequate grounds for suspending or revoking a Marijuana Establishment's License or denying a renewal application for a Marijuana Establishment License." 935 CMR 500.450. The Commission's Enforcement Counsel has alleged, and I agree, that the facts in the Order, which I have largely

assumed to be true, gave the Commission multiple legal grounds to suspend, revoke, or deny the renewal of Elev8's License under 935 CMR 500.450(2), (3), (4), (7), (11), and (15). These specific grounds and my legal conclusions are explained more fully below.

a. 935 CMR 500.450(2) (Deceptive Information)

Under 935 CMR 500.450(2), the following are grounds for suspension, revocation, and denial of renewal applications: "Information provided by the Marijuana Establishment was deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity, including lack of disclosure or insufficient disclosure."

In Count XVI of the Order, the Commission alleged that it had grounds under 935 CMR 500.450(2) to revoke Elev8's License because Elev8's owner, Oluwaseun Adedeji ("Mr. Adedeji") made multiple misrepresentations to the Commission. Evaluating the Findings of Fact, I conclude that Mr. Adedeji made misrepresentations to the Commission on the following occasions:

- August 8, 2022 (concerning sleeping at the Athol store). Findings of Fact Nos. 14 and 15³.
- August 20, 2022 (concerning sleeping at the Athol store). Findings of Fact Nos. 27 and 62.
- September 21, 2022 (concerning the reasons for the police being at the Athol store on September 3, 2022). Findings of Fact Nos. 31 and 41.
- March 8, 2023 (concerning the dismissal Employee #4 and Employee #5). Findings of Fact Nos. 90 and 92.
- March 22, 2023 (concerning the closure of the Athol store). Finding of Fact No. 109.

I conclude that each of these misrepresentations constituted sufficient grounds for the suspension, revocation or denial of the renewal of a Marijuana Establishment License under 935

³ The citations are to the Findings of Fact in this Recommended Decision, not the Order.

CMR 500.450(2). I further conclude that Mr. Adedeji's conduct can be imputed to Elev8, the Marijuana Establishment, because as (majority) owner, Mr. Adedeji was a Marijuana Establishment Agent under 935 CMR 500.002, and, as a person on Elev8's license application, he was also a "Licensee" under 935 CMR 500.002. In addition, Mr. Adedeji was Elev8's Chief Executive Officer.

b. 935 CMR 500.450(3) (Failure to Comply with Regulatory Requirements)

Under 935 CMR 500.450(3), the following are grounds for suspension, revocation, or denial of renewal of a license: "The Marijuana Establishment has failed to comply with any requirements of St. 2016, c. 334, as amended by St. 2017, c. 55, M.G.L. c. 94G, or 935 CMR 500.500, or any applicable law or regulation . . ."

In Count XV of the Order, the Commission alleged that Elev8 violated 14 different regulatory requirements and that "[a]ny one of Respondent's regulatory violations may serve as full and adequate grounds for revocation, but taken together, all 14 of Respondents' regulatory violations demonstrate a severe lack of compliance and serve as full and adequate grounds for revocation of Respondent's licenses under 935 CMR 500.450(3)."

Reviewing the Findings of Fact, I conclude that Elevate violated the following 13 regulatory requirements:

- *Failure to track the distribution of marijuana:* In Count I of the Order, the Commission alleged that starting on June 8, 2022, Elev8 did not correctly track individual agents involved in the distribution of marijuana or marijuana products in Metrc in violation of 935 CMR 500.105(8)(g). Findings of Fact Nos. 8, 16, 71, 72, and 96 support the allegation that Elev8 did not track individual agents. However, I conclude that these Findings of Fact do not establish that Elev8 violated 935 CMR 500.105(8)(g) because that provision, on its face, does not require the tracking of agents, and the Commission did not make any specific allegation that at the time in question, it required the Seed-to-Sale SOR to track individual agents.
- *Failure to maintain real-time inventory of marijuana:* In Count II of the Order, the Commission alleged that Elev8 violated 935 CMR 500.105(8)(b), which requires a Marijuana Establishment to keep a real-time inventory. I conclude that Finding of Fact No. 76 establishes that Elev8 failed to maintain a real-time inventory of marijuana at the

time of the January 11, 2023 unannounced inspection and that this failure constituted a violation of 935 CMR 500.105(b).

- *Failure to conduct monthly inventories:* In Count III of the Order, the Commission alleged that Elev8 violated 935 CMR 500.105(8)(c) and (d) by failing to properly conduct monthly inventories. I conclude that Finding of Fact No. 34 establishes that Elev8 did not conduct monthly inventories for the months of July and August 2022 and that this failure was a violation of 935 CMR 500.105(8)(c)(1) and (2). I conclude that Findings of Fact Nos. 34, 68, 78, and 98 establish that Elev8's inventories for the months of September and November 2022 and January and February 2023 did not include the information required by 935 CMR 500.105(8)(d) and that Elev8 therefore also violated that provision.
- *Failure to notify the Commission of inventory discrepancies:* In Count IV of the Order, the Commission alleged that Elev8 failed to notify the Commission of inventory discrepancies in accordance with 935 CMR 500.110(9)(a)(1) and (b). I conclude that Findings of Fact Nos. 35, 36, and 39 establish that Elev8 failed to notify the Commission of inventory discrepancies in September 2022 and that Elev8 therefore violated 935 CMR 500.110(9)(a)(1) and (b).
- *Failure to notify the Commission of local law enforcement response:* In Count V of the Order, the Commission alleged that on multiple occasions, Elev8 failed to notify the Commission of events that require local law enforcement response in violation of 935 CMR 500.110(9)(a)(7) and (b). Specifically, 935 CMR 500.110(9)(a)(7) mandates notification of an "alarm activation or other event that requires response by public safety personnel . . ." I conclude that Findings of Fact Nos. 28, 29, 31, 32, 52, and 53 establish that Elev8 did not notify the Commission of local law enforcement response on August 23, 2022, September 3, 2022, and October 2, 2022 and that Elev8 therefore violated 935 CMR 500.110(9)(a)(7) and (b).
- *Failure to register employees as agents:* In Count VI of the Order, the Commission alleged that Elev8 violated 935 CMR 500.030(1) by failing to register employees as agents. I conclude that Findings of Fact Nos. 67 and 74 establish that Elev8 failed to register Operations Manager #1 and Employee #5 as agents and that Elev8 therefore violated 935 CMR 500.030(1).
- *Failure to ensure Agents complete minimum training requirements prior to performing job functions:* In Count VII of the Order, the Commission alleged that Elev8 violated 935 CMR 500.105(2) by failing to ensure that employees completed minimum training requirements prior to performing job functions. I conclude that Findings of Fact Nos. 70, 71, 73, and 74 establish that Employees #4 and #5 performed job functions prior to completing minimum training and that Elev8 therefore violated 935 CMR 500.105(2).
- *Failure to notify Commission of changes in Agent status:* In Count VIII of the Order, the Commission alleged that Elev8 violated 935 CMR 500.030(4) multiple times by failing to notify the Commission no more than one business day after an Agent ceased to be associated with an establishment. I conclude that Findings of Fact Nos. 10, 11, and 60

establish that Elev8 failed to notify the Commission no more than one business day after General Manager #1, General Manager #2, Employee #3, and five other agents ceased to be associated with Elev8 and that Elev8 therefore violated 935 CMR 500.030(4).

- *Failure to preserve requested video records:* In Count IX of the Order, the Commission alleged that Elev8 violated 935 CMR 500.110(5)(a)(5) by failing to preserve requested video records. I conclude that Finding of Fact No. 30 establishes that Elev8 failed to comply with the Commission's request that it retain all video footage starting on July 24, 2022 until further notice and that Elev8 therefore violated 935 CMR 500.110(5)(a)(5).
- *Failure to lock exterior dumpsters and render waste unusable:* In Count X of the Order, the Commission alleged that Elev8 violated 935 CMR 500.105(12)(a) and (c)(3) by failing to lock exterior dumpsters and to render waste unusable. I conclude that Findings of Fact Nos. 38 and 77 establish that Elev8 failed to lock exterior dumpsters on two occasions (September 6, 2022 and January 11, 2023) and to render solid waste unusable on one occasion (September 6, 2022). I further conclude that in so doing, Elev8 violated 935 CMR 500.105(12)(a) and (c)(3).
- *Failure to ensure two Agents witness the disposal of marijuana:* In Count XI of the Order, the Commission alleged that Elev8 violated 935 CMR 500.105(12)(d) by failing to ensure that two Agents witness the disposal of marijuana. I conclude that Finding of Fact No. 82 establishes that on one occasion, Elev8 failed to ensure that at least two Agents witnessed the disposal of marijuana and that Elev8 therefore violated 935 CMR 500.105(12)(d).
- *Failure to ensure security equipment is in good working order:* In Count XII of the Order, the Commission alleged that Elev8 violated 935 CMR 500.110(5)(f) by failing to ensure that one of its vault cameras was in good working order. I conclude that Finding of Fact No. 80 establishes that one of Elev8's vault cameras was not in good working order in January 2023 and that Elev8 violated 935 CMR 500.110(5)(f).
- *Sale of expired marijuana:* In Count XIII of the Order, the Commission alleged that Elev8 violated 935 CMR 500.160(5) by selling expired marijuana. I conclude that Finding of Fact No. 84 establishes that in the December 2, 2022 to January 10, 2023 time period, Elev8 sold a total of 17 units and 0.3 grams of expired Marijuana and Marijuana products. I further conclude that in so doing, Elev8 violated 935 CMR 500.160(5).
- *Failure to notify the Commission of a charge that would result in a mandatory disqualification:* In Count XIV of the Order, the Commission alleged that Elev8 violated 935 CMR 500.801(3) because Mr. Adedeji failed to notify the Commission that he had been arrested and charged with a felony offense – specifically, Open and Gross Lewdness under G.L. c. 272, § 16—that would result in a mandatory disqualification under 935 CMR 500.801, Table A, Row 1. I conclude that as a Licensee and Registered Agent, Mr. Adedeji was subject to 935 CMR 500.801(3) and that his behavior can be imputed to Elev8. I further conclude that Findings of Fact Nos. 61-64 establish that Mr. Adedeji failed to notify the Commission of his felony charge in violation of 935 CMR 500.801(3).

I further conclude that each of these 13 violations of the Commission’s regulations constituted technically sufficient grounds for the suspension, revocation or denial of renewal of a Marijuana Establishment license under 935 CMR 500.450(2).

c. 935 CMR 500.450(4) (Failure to Submit a POC and implement the POC as submitted)

Under 935 CMR 500.450(4), the following are grounds to suspend, revoke, or deny the renewal of a license: “The Marijuana Establishment has failed to submit a plan of correction as required or to implement the plan as submitted pursuant to 935 CMR 500.320.” In Count XVII of the Order, the Commission alleged that it had grounds to revoke Elev8’s License under 935 CMR 500.450(4). Findings of Fact Nos. 17, 27, 45, 46, and 55 establish that Elev8 failed to implement a plan of correction (“POC”) in which Elev8 agreed that no one would sleep at the Athol store and an that Elev8 failed to provide an amended POC by October 3, 2022 in response to a Notice of Deficiency. I conclude that these facts constituted grounds to suspend, revoke, or deny the renewal of Elev8’s License under 935 CMR 500.450(4).

d. 935 CMR 500.450(7) (Incompetent operation)

Under 935 CMR 500.450(7)(f), there are grounds to suspend, revoke, or denial the renewal of a license where “[t]here has been a lack of responsible operation of a Marijuana Establishment, as shown by . . . incompetent or negligent operation.” In Count XVIII of the Order, the Commission alleged that it had grounds to revoke Elev8’s License under 935 CMR 500.450(7) because Elev8’s operation was incompetent. In support of its general allegation that Elev8 ran an incompetent operation, the Commission referenced the regulatory violations, misrepresentations, and POC failures that it claimed in Counts XVI, XV, and XVII, respectively, were standalone grounds for revocation. In addition, the Commission referenced the following, among other things, in support of its allegation of Elev8’s incompetence:

- Elev8’s three closures, from August 16 to September 30, 2022; October 2, 2022 to November 28, 2022; and March 22 to 23, 2023. Findings of Fact Nos. 21, 48, 51, 69, 108, and 109 establish that these closures occurred.

- Elev8's staff turnover, including losing all of its 7 staff members before the August 16, 2022 closure and 7 new employees before the October 2, 2022 closure. Findings of Fact Nos. 26 and 60 establish that this staff turnover occurred.

The Commission's regulations do not define "incompetent," but Merriam Webster's online dictionary defines "incompetent" as "(1)(a) lacking the qualities needed for effective action, (b) unable to function properly; (2) not legally qualified; and (3) inadequate to or unsuitable for a particular purpose." Given Elev8's multiple regulatory violations, closures, staff turnover, misrepresentations, and failure to produce and comply with POCs, I agree with the Commission's characterization of Elev8's operation as incompetent; the facts demonstrate that Elev8 was not up to the task of serving as a stable and legally compliant Marijuana Establishment. On this basis, I further conclude that there are grounds to suspend, revoke, or deny the renewal of Elev8's License pursuant to 935 CMR 500.450(7).

e. 935 CMR 500.450(11) and (15) (Licensee's conduct is detrimental to the safety and welfare of the public and demonstrates a lack of suitability)

In Count XIX of the Order, the Commission alleged that there were grounds to revoke Elev8's License under 935 CMR 500.450(11) and (15). Under 935 CMR 500.450(11), there are grounds to suspend, revoke, or deny the renewal of a license where "[t]he conduct or practices of a Marijuana Establishment demonstrate a lack of suitability as specified in 935 CMR 500.800 and 500.801." Finding of Fact No. 117 establishes that on May 1, 2023, the Commission notified Mr. Adedeji that he had been determined to be unsuitable because of his actions on March 22 and 23, 2023, which posed a risk to the public safety and welfare and related to Elev8's actions. The suitability standards for Marijuana Establishment Licensees apply to applicants, Licensees, and Persons or Entities Having Direct or Indirect Control in accordance with 935 CMR 500.101(1). 935 CMR 500.801 (Table A). Because Mr. Adedeji was a person on Elev8's license application, he is a Licensee, and because he is its majority owner, he is a Person or Entity Having Direct Control of Elev8. 935 CMR 500.001. As a result, I conclude that (1) the Commission's finding that Mr. Adededeji was unsuitable can be imputed to Elev8 and (2) that were grounds to suspend, revoke, or deny the renewal of Elev8's License under 935 CMR 500.450(11) based on the Commission's determination of Mr. Adedeji's unsuitability.

Under 935 CMR 500.450(15), there are grounds to suspend, revoke, or deny the renewal of a license where “[t]he conduct or practices of the Marijuana Establishment have been detrimental to the safety, health, or welfare of the public.” The Commission alleged that the five-minute video posted to Instagram by Mr. Adedeji on March 23, 2023 constituted grounds to revoke Elev8’s license. Findings of Fact Nos. 109-113 establish the contents of the March 23, 2023 video. I conclude that Mr. Adedeji’s conduct and statements in the video, in which he threatened to kill former employees and imitated the sound of a gun being fired, can imputed to Elev8, were detrimental to the safety, health and welfare of the public, and constituted grounds to suspend, revoke, or deny the renewal of Elev8’s License under 935 CMR 500.450(15).

2. Recommended Discipline

The final question is what discipline to recommend to the Commission, given my conclusion that there were multiple, independent grounds to suspend, revoke, or deny the renewal of Elev8’s License. In the Order, Enforcement Counsel sought the revocation Elev8’s License. As explained below, I agree with Enforcement Counsel’s analysis and recommend that the Commission revoke Elev8’s License. A threshold question that must be addressed, however, is whether the Commission may revoke Elev’s License, given that it expired on April 10, 2023. The controlling statute (G.L. c. 94G) and the Commission’s regulations are silent on this point. After reviewing pertinent authority in Massachusetts and other jurisdictions, I conclude that the Commission may revoke Elev8’s License, as its continued ability to do so best furthers its statutory mission of protecting the public.

a. Effect of Expired License on Commission’s Disciplinary Authority

Case Law in Other Jurisdictions

For decades, courts in multiple jurisdictions have wrestled with the question of whether a licensing authority may revoke an expired license. Sometimes the question is framed in terms of jurisdiction; sometimes it is framed in terms of mootness; and sometimes it is framed in terms of authority. See, e.g., Wang v. Board of Registration in Medicine, 405 Mass. 15 (1989)(jurisdiction); Sachs v. New York State Racing and Wagering Board, 1 A.D.3d 768 (3d Dep’t 2003)(authority); In re Feinstein’s License, 25 Pa. D&C 169 (1935)(mootness).

Courts have arrived at different answers to this question. Some courts have held that a licensing authority may revoke an expired license where the licensing authority is expressly authorized to do so under a statute or regulation. E.g., Goldstein v. Dep’t of Business and Professional Regulation, 389 So.3d 678, 680 (Fla. Dist. Ct. App. 2024); Grobovsky v. Board of Medical Examiners, 213 Or. App. 136, 147-48 (2007).

Other courts have held that a licensing authority may revoke an expired license, even in the absence of statutory authority to do so. These courts have typically reasoned that a licensing authority’s continued ability to discipline an expired license furthers the purposes of the licensing regime and have observed that if a licensing authority could not impose discipline on an expired license, licensees could escape the consequences of their infractions by simply allowing their licenses to expire. E.g., Welsh-Alexis v. State ex. rel. Board of Funeral Directors, No. 1 CA-CV 17-0768, 2018 WL 5729413, at *7 (Ariz. Ct. App. 2019)⁴; Case of Seila’s Liquor License, 124 Pa.Super. 519, 523-535 (1937).

Still other courts have held that a licensing authority may not revoke an expired license in the absence of statutory authority to do so. E.g., Indiana Board of Pharmacy v. Elmer, 171 N.E.3d 1045, 1052 (Ind. Ct. App. 2021); Stern v. Connecticut Medical Examining Board, 208 Conn. 492, 498-505 (1988). These courts have observed that licensing authorities may examine past licensees’ alleged infractions in the context of reinstatement proceedings. Id.

⁴ In Welsh-Alexis, the court held that the Board could complete disciplinary proceedings commenced before the expiration of a license. 2018 WL 5729413, at *7. Here, the October 31, 2023 Order to Show Cause was issued after the Elev8’s license expired on April 10, 2023. However, the Summary Suspension Order was issued on March 24, 2023, before the license expired and is based on many of the same facts in the Order to Show Cause. Because the Order to Show Cause is effectively a continuation of the Summary Suspension Order, which is an interim measure, disciplinary proceedings in this case effectively began before Elev8’s license expired. As a result, I do not need to address here whether and under what circumstances the Commission could revoke an expired license through disciplinary proceedings commenced after the license’s expiration.

Key Massachusetts Case: Wang v. Board of Registration in Medicine

One Massachusetts case, Wang v. Board of Registration in Medicine, 405 Mass. 15 (1989), is particularly instructive but is not exactly on point. In Wang, the Board of Registration in Medicine (“board”) revoked Wang’s registration to practice medicine. Wang argued, among other things, that the board did not have jurisdiction over him because his license had expired before the board initiated disciplinary proceedings. Id. at 15-16. The Massachusetts Supreme Judicial Court (“SJC”) held that the board had jurisdiction over Wang because, although his certificate of registration had expired, the underlying licensing statute permitted physicians to revive expired certificates of registrations through an automatic renewal process⁵. Id. at 18. The SJC explained that an applicant for licensure received two entitlements under the statute: “first, to be registered as a qualified physician, and secondly, to receive a certificate of registration.” Id. The SJC stated: “The Massachusetts statutory scheme leads us to conclude that the board retained jurisdiction over the plaintiff. The board’s order revoking the plaintiff’s registration, at a minimum, revoked Dr. Wang’s inchoate right to reestablish his status as a licensed physician in Massachusetts simply by completing the renewal process.” Id. at 19.

Wang argued that the board could have waited until he filed a renewal application to initiate disciplinary proceedings, but the SJC rejected that argument, stating:

The board’s purpose is the protection of the public, and when the board exercises its statutory function of conducting disciplinary proceedings, it is pursuing that purpose. It is logical and sensible that, where such grave charges of unprofessional or dishonorable conduct are alleged, the Board has the right to preserve [any] evidence . . . of these charges; otherwise witnesses may disappear and the passage of time itself may well dim or even eradicate the memory of the witnesses and thus preclude the construction of an adequate record. As the board’s hearing officer who heard Wang’s amended motion to dismiss stated, a jurisdictional standard must confer authority to discipline physicians who commit misconduct while fully licensed; otherwise a physician’s obligation to respond to charges arising out of his or her licensure would be defeated and the board’s public protection function would be frustrated.

Id. at 20 (internal citations omitted).

⁵ The statute (G.L. c. 112, § 2) provided: “The certification of registration of any physician who does not file a completed renewal application together with the fee shall be automatically revoked, but shall be revived upon completion of the renewal process.”

The Commission's Authority

The cases described above do not provide a clear answer as to the Commission's authority in this case. The cases outside of Massachusetts are not consistent, and the Wang case is not exactly on point because there is no provision in the controlling statute and the Commission's regulations that provides "an inchoate right" to reestablish an expired license in the cannabis context. Rather, G.L. c. 94G, § 6(a) provides that "[u]less the commission authorizes the renewal of a license for a longer period, all licenses under this chapter shall be effective for 1 year from the date of issuance," and § 6(b) provides in relevant part that "the commission shall issue a renewal license within 30 days of receipt of a renewal application and renewal license fee from a marijuana establishment to licensees in good standing" The Commission's regulations further provide that a Marijuana Establishment must submit a completed renewal application to the Commission no later than 90 days prior to the expiration date of its license. 935 CMR 500.103(a). Taken together, I interpret the statute and regulations to mean that if a Licensee does not submit a renewal application in time, their license expires, and the Licensee does not have the "inchoate right" to renew their license similar to the right described in Wang.

Notwithstanding the difference between the situation here and in Wang, I conclude that the Commission may revoke an expired license. My conclusion is based on the statutory purpose of the Commission and the public policy considerations articulated in Wang and other cases.⁶ Like the board in Wang, one of the Commission's purposes is to protect the public, and in furtherance of this purpose, the Commission has the statutory power to "determine which applicants shall be awarded licenses" and to "deny an application or limit, condition, restrict, revoke, or suspend a

⁶ In Wang, the SJC distinguished the statutory regime at issue from that in Stern v. Medical Examining Board, 208 Conn. 492, 493 (1988), where the statute in question explicitly said that a license would become void 90 days after its time for renewal, and in which the court held that it did not have jurisdiction to revoke a physician's expired license. 405 Mass. at 18-19. Although the SJC's discussion of Stern arguably could be read to mean that a licensing authority does not have jurisdiction over a licensee whose license has expired and cannot be automatically renewed upon application, I consider the SJC's comments about Stern to be dicta and weigh its commentary about the protection of the public more heavily in reaching my conclusion that the Commission may revoke Elev8's expired license.

license.” G.L. c. 94G, §§(4)(a)(xi) and (xiv). The Commission’s revocation of a license does not affect just the license at issue; it also mandatorily disqualifies the Licensee from holding a license for the next five years. 935 CMR 500.801: Table A, Row 14.

Against this backdrop, I conclude that the Commission may revoke an expired license because this conclusion best furthers the Commission’s purpose of protecting the public. If the Commission could not revoke an expired license, many licensees could escape the collateral effects of their infractions – particularly those committed toward the end of a license’s term – by allowing their licenses to expire before disciplinary proceedings were completed. Although the Commission could examine alleged infractions if the licensees applied for new licenses, this is an inferior option because, as described by the SJC in Wang, evidence may no longer be fresh or even available at that point. Revocation is the option that most effectively ensures that licensees that are a threat to the public remain barred from the Massachusetts cannabis industry for the requisite period of time.

b. Rationale for Revocation of Elev8’s License

Having concluded that the Commission may revoke an expired license, my recommendation to the Commission is that it revoke Elev8’s License (MR282810) retroactive to March 25, 2023, the effective date of the Summary Suspension Order.

As explained earlier, the Commission has multiple, independent legal grounds to suspend, revoke, or deny the renewal of Elev8’s License under 935 CMR 500.450. While some of Elev8’s infractions might not, on their own, warrant a penalty as serious as revocation,⁷ collectively, they lead to the ineluctable conclusion that Elev8’s continued operation is a threat to the public health, safety, and welfare and should be disallowed. The overall picture of Elev8’s operation is one of incompetence and ongoing reckless disregard for the Commission’s regulations, including those involving agents, inventory, expired marijuana, and notification of law enforcement responses. Most disturbing, however, is Mr. Adedeji’s five-minute long March 23, 2023 video, in which he

⁷ I would not, for example, recommend that the Commission revoke a license based solely on a Licensee’s failure to lock a dumpster in violation of 935 CMR 500.105(12).

threatened to kill former employees and imitated the sound of a gun being fired. Such behavior cannot be countenanced, either on its own or in combination with Elev8's other infractions, and leads me to conclude that the only appropriate sanction in this matter is revocation.

I recommend that the revocation date of Elev8's License be made retroactive to March 25, 2023, the date of the Summary Suspension Order took effect, not the date of the Commission's Final Decision (or even this Recommended Decision). This is because, as noted earlier, under 935 CMR 500.801: Table A, Row 14, a Licensee whose license has been revoked is mandatorily disqualified from licensure for the next five years. It seems fair to make the revocation date the same day as the Summary Suspension Order, given that Elev8's License has not been active since that time. Further, given that the hearing process has been protracted, I believe it would be unfair to link Elev8's revocation date to the date of a Commission decision, as that would effectively lengthen Elev8's five-year bar because of the delay in the hearing process.

Recommended Discipline

I recommend that the Commission revoke Elev8's License (MR281810) effective March 25, 2023 and take no action with respect to Provisional License Nos. MR282630 and MR281383, which were never issued.

Written Objections and Arguments

The Parties are hereby notified that within 21 days of the issuance of this Recommended Decision, they may submit to the Commission written objections and arguments regarding this Recommended Decision. Any such written objections and/or arguments should be submitted to the following email address: hearings@cccmass.com

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: September 9, 2025

Notice sent to:

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COMMONWEALTH OF MASSACHUSETTS

WORCESTER COUNTY

CANNABIS CONTROL COMMISSION

IN THE MATTER OF

Elev8 Cannabis, Inc.

License No. MR281810
Application Nos. MRN282630,
MRN281383

CCC-HO-23-0001

(Enforcement Case No. ENF-2022-1336)

**COMMISSION RESPONSE TO HEARING OFFICER
QUESTIONS AND INVITATION FOR BRIEFING**

The Cannabis Control Commission (the “Commission”) submits this reply in response to the Hearing Officer’s order for information related to the Respondent’s license status and invitation for briefing on August 6, 2025.

I. RELEVANT FACTS

1. According to the Massachusetts Cannabis Industry Portal (“MassCIP”), Elev8 Cannabis, Inc. (the “Respondent”) held one final license, License No. MR281810 (“Respondent’s License”);
2. The Commission approved Respondent’s License for final licensure on September 10, 2020, and Respondent commenced operations on October 7, 2020. *See* Enclosure 1, MassCIP License Record (MR281810);
3. Respondent also submitted two other Marijuana Retailer license applications, Application Nos. MRN282630 and MRN281383, that the Commission approved for provisional licensure on January 21, 2020 (the “Provisionally Approved Applications”). *See*



Enclosure 2, Notice of Provisional License Approval (MRN282630); *see also* Enclosure 3, Notice of Provisional License Approval (MRN281383);

4. While MassCIP created a digital license record for the Provisionally Approved Applications,¹ Respondent did not pay the initial license fees for the Provisionally Approved Applications within 90 days as required by 935 CMR 500.103(1)(e) so the Commission did not issue the provisional licenses, and the approval expired. *See* Enclosure 4, MassCIP License Record (MR282630); *see also* Enclosure 5, MassCIP License Record (MR281383);
5. On March 24, 2023, the Commission suspended Respondent's License and license records for the Provisionally Approved Applications through the issuance of a Summary Suspension Order;
6. On March 29, 2023, MassCIP marked the records associated with the Provisionally Approved Applications as deleted "because it was suspended on 03/25/2023 while in the Payment Pending Status." *See* Enclosure 4 and 5;
7. On April 10, 2023, Respondent's License expired. *See* Enclosure 1;
8. On October 17, 2023, the Town of Athol terminated its Host Community Agreement with Respondent. *See* Enclosure 6, Town of Athol Public Meeting Minutes | October 17, 2023;
9. On October 31, 2023, the Commission issued the Order to Show Cause to revoke Respondent's License;

II. COMMISSION RESPONSES

In the order from August 6, 2025, the Hearing Officer invited the parties to submit a legal brief on "whether, if there were grounds for revocation of licenses that have since expired and

¹ These linked records are created automatically for all applications.



have not been renewed, [the Hearing Officer] should: [1] recommend to the Commission that such licenses be revoked; [2] recommend to the Commission that it issue a declaration stating that it had grounds to revoke the licenses before they expired; or [3] make some other recommendation to the Commission.”

In accordance with 935 CMR 500.370 and the Order to Show Cause issued on October 31, 2023, Enforcement asks that the Hearing Officer recommend that Respondent’s License be revoked provided that the Hearing Officer finds that the Commission has carried its burden demonstrating that there are grounds for revocation of said license.

a. The Commission has jurisdiction to investigate a licensee and revoke its licenses for its actions while licensed that violate Commission statute, regulation, or order.

Pursuant to G.L. c. 94G, the Legislature granted the Commission considerable authority to carry out and effectuate its purposes as the agency responsible for licensing and oversight of the Massachusetts Cannabis industry. Such authority includes the ability to investigate and act against a licensee, including the power to deny, limit, condition, restrict, revoke or suspend a license. *See* G.L. c. 94G, §§ 4(a)(xi) and (xiv). As it relates to persons or entities seeking the privilege to operate a Marijuana Establishment in the Commonwealth, once licensed, they are subject to Commission oversight, and the acceptance of a license constitutes an agreement that the Licensee will adhere to Commission laws. *See* 935 CMR 500.103(2)(d). That privilege may be revoked by the Commission for certain violations. *See* 935 CMR 500.450 (detailing grounds that constitute full and adequate grounds for the suspension, revocation, or denial of a renewal application). Any such revocation would not only affect the licensee’s current license but may also impact its future eligibility to hold one. *See* 935 CMR 500.801: *Table A, Row 14* (revocation of a license within the last five years resulting in a Mandatory Disqualification from licensure); 3



Cf. eVineyard Retail Sales-Massachusetts, Inc. v. Alcoholic Beverages Control Commission, 450 Mass. 825, 829 (2008) and *Wang v. Board of Registration in Med.*, 405 Mass. 15, 19 (1989).

The Commission has a vested interest in establishing and preserving a record of Respondent's violations to serve as a resolution to the immediate matter and for any consideration of future applications. *See Wang*, 405 Mass. at 20, *quoting Cross v. State Bd. of Dental Examiners*, 37 Colo.App. 504, 508 (1976) ("[I]t is logical and sensible that, where such grave charges of...unprofessional or dishonorable conduct are alleged, the Board has the right to preserve [any] evidence...of these charges; otherwise witnesses may disappear and the passage of time itself may well dim or even eradicate the memory of the witnesses and thus preclude the construction of an adequate record").

Here, the Commission exercised its authority to investigate, and the violations discovered were such that the Commission acted to immediately suspend Respondent's license on March 24, 2023. Subsequently, the Commission sought revocation of the Respondent's Licenses on October 31, 2023. Notwithstanding the fact that Respondent no longer has a Host Community Agreement,² the nineteen violations touching on virtually every aspect of a Marijuana Establishment's operations as alleged in the Commission's Order to Show Cause, are substantial and fully demonstrate that the Commission has grounds to revoke Respondent's License.

b. The Commission retains jurisdiction to revoke Respondent's License because the license was not void.

In *Wang*, the court distinguished between the statutory language of G.L. c. 112, § 2, governing registration of physicians, and a statute at question in Connecticut dealing with a similar issue. *See Wang*, at 19. The court noted that the statutory scheme in the Connecticut

² A necessary requirement for continued licensure absent a Host Community Agreement Waiver. *See* G.L. c. 94G, § 3(d); *see also* 935 CMR 500.101(1)(a)8.; and 935 CMR 500.180.



matter included language automatically voiding a license after 90 days unless renewed differed “sharply [from] the Massachusetts provision that the certificate of registration of a physician who fails to renew ‘shall be automatically revoked, but shall be revived upon completion of the renewal process.’” *Id.* The court found that the language of G.L. c. 112, § 2 meant that the board retained jurisdiction over the plaintiff. *Id.*

Here, while the Commission does have a voiding provision in its regulations, it is not automatic; rather, it provides discretion to the Commission to make a determination that a licensee Ceases to Operate. *See* 935 CMR 500.002, definition of CEASES TO OPERATE (“closes and does not transact business for a period greater than 60 days with no substantial action taken to reopen...the Commission *may* determine that a Marijuana Establishment has Ceased to Operate based on its actual or apparent termination of operations”) (emphasis added); *see also* 935 CMR 500.415. Since the voiding of a license is not automatic, the Commission’s scheme is distinct from that of the Connecticut agency mentioned in Wang. *See Wang*, at 19 (Conn.Gen.Stat. § 19a-88(f) (1987) stating that “the license or certificate *shall* become void ninety days after the time for its renewal ... unless it is renewed”) (emphasis added). Moreover, like the Board of Registration in Medicine in Wang, an expired license may be renewed by a licensee upon the submission of a renewal application and payment of the applicable fee, provided that the Commission has not determined that it has ceased to operate. *See* 935 CMR 500.103(4)(a). Notably, the Commission has determined that in some instances an expired license is not eligible to be reinstated, such as via an administrative extension. *See* [Bulletin | Administrative Extension of Licenses | February 25, 2025](#). Therefore, the discretionary ability of the Commission to determine that a license is void should not pose any barrier to the



Commission retaining its jurisdiction in the immediate matter or over a similarly situated licensee absent a determination otherwise.³

c. The expiration of Respondent's License does not change the Commission's position that it should be revoked.

Licensees cannot avoid accountability to the Commission for violative acts by merely allowing their license to expire—or even actively surrendering their license—because it would frustrate the Commission's purpose as the steward of the industry and hinder the Commission's ability to ensure compliance. *See eVineyard Retail Sales*, 450 Mass. at 830, *citing Perry v. Medical Practice Bd.*, 169 Vt. 399, 404 (1999) (“It is well settled that a *licensee* may not evade disciplinary action merely by resigning or allowing a license to expire.... Otherwise, the licensee could apply for admission in another jurisdiction, or subsequently reapply in the same jurisdiction, and maintain that he or she has never been disciplined for professional misconduct.”) (Emphasis in original). Here, Respondent's License expired on April 10, 2023. The license expiration does not change the Commission's position for the reasons mentioned in this brief.

d. The Commission's request for the imposition of a revocation of Respondent's License is a request for a permanent revocation of said license.

Consistent with the Order to Show Cause issued on October 31, 2023, the Commission is seeking the imposition of a revocation of Respondents License rather than a temporary revocation (*i.e.*, suspension) to be removed at some point in the future. While it is true that the summary suspension issued on March 24, 2023, no longer presents a live dispute due to the license expiration, the resolution of the Order to Show Cause seeking a revocation of said

³ While it is possible the Commission may make such a determination that a licensee Ceases to Operate, it is unlikely that the Commission would make that determination during the pendency of an administrative hearing.



licenses is a live matter and has been open since October 2023. These facts distinguish the instant matter from others where revocation is merely a part of a summary suspension action. *See Department of Public Health, Petitioner v. Joseph Amello, Respondent*, 2024 WL 4475619, at *2 (the Department of Public Health “stated five grounds to immediately suspend Mr. Amello’s EMT certificate and then revoke if [certain conditions were not met]”). By issuing the Order to Show Cause, the Commission has made its intent clear regarding Respondent’s Licenses.

Further, revocation is a desired outcome since it will, if imposed, establish a lasting record regarding Respondent’s conduct while a licensee. This record is important for the purpose of determining Respondent’s future suitability for licensure. While the revocation is intended to be permanent with respect to Respondent’s License and will have the effect of Mandatorily Disqualifying them for the next five years, afterwards Respondent will have an opportunity in the future to seek licensure. *See supra* 935 CMR 500.801: *Table A, Row 14*; *see also* 935 CMR 500.801: *Table A, Row 15* (revocation of a license within the last ten years but no sooner than five years results in a Presumptive Negative Suitability Determination).

III. REQUESTED RELIEF

The Commission asks that the Hearing Officer find that the Commission retained jurisdiction over Respondent to seek the imposition of a revocation even though its license expired on April 10, 2023.

Further, due to Respondent’s failure to timely respond to the Order to Show Cause, Enforcement’s request for a default judgment—Respondent’s failure to timely respond to the motion for default judgment—and the substantial evidence presented in its Order to Show Cause, Enforcement moves the Hearing Officer to accept into the administrative record, the entirety of



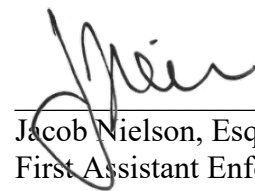
the Commission's facts, findings, and evidence as set forth in the Order to Show Cause and recommend to the Commission that Respondent's licenses be revoked.

If the Hearing Officer requests further briefing, the Commission is available to appear at a pre-hearing conference.

IV. ENCLOSURES

1. MassCIP License Record (MR281810)
2. Notice of Provisional Approval (MRN282630)
3. Notice of Provisional Approval (MRN281383)
4. MassCIP License Record (MR282630)
5. MassCIP License Record (MR281383)
6. Town of Athol Public Meeting Minutes | October 17, 2023

For the Commission:



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Timothy.Goodin@cccmass.com

Dated: August 19, 2025

Copy to:

Oluwaseun Adedeji
Email: lov3elev8@gmail.com





Massachusetts Cannabis Control Commission

All

Marijuana Retailer

General Information:

License Number: MR281810

Original Issued Date: 02/14/2020

Issued Date: 04/07/2022

Expiration Date: 04/10/2023

Payment Received: \$10000 Payment Required: \$10000

CNB WORKFLOW

Application Classification: General Applicant First Compliance Review Date: 10/02/2018 Deemed Complete Date: 11/27/2019

Date of Final Licensure: 09/10/2020 Commence Operations Date: 10/07/2020

Current Queue:

Position in the Queue:

CNB DOCUMENT UPLOAD

No documents uploaded

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Elev8 Cannabis Inc

Federal Tax Identification Number EIN/TIN: 84-3674750

Phone Number: 817-323-5586 Email Address: seun@elev8cannabis.com

Business Address 1: 243 Main St

Business Address 2:

Business City: Athol

Business State: MA

Business Zip Code: 01331

Mailing Address 1: 243 Main St

Mailing Address 2:

Mailing City: Athol

Mailing State: MA

Mailing Zip Code: 01331

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

No documents uploaded

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

No documents uploaded

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

To your knowledge, is the existing RMD certificate of registration in good standing?:

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 93.12

Percentage Of Control:

93.12

Role: Owner / Partner

Other Role:

First Name: Oluwaseun

Middle Name:

Last Name: Adedeji

Suffix:

Former Last Name:

Alias - 1:

Alias - 2:

Alias - 3:

Phone:

Email:

Primary Address 1:

Primary Address 2:

City:

State:

Zip Code:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES DOCUMENTATION - INDIVIDUALS

No documents uploaded

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: SSZ Real Estate Holding LLC

Entity DBA:

Email: seun@elev8cannabis.com

Phone: 817-323-5586

Address 1: 243 Main Street

Address 2:

City: Athol

State: MA

Zip Code: 01331

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of Capital Provided: \$384690

Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES DOCUMENTATION - ENTITY

Amounts and Sources of Capital Documentation:

Document Category	Document Name	Type	ID	Upload Date
Existence of Capital Verification	Elev8 Funds Statement.pdf	pdf	5c3d2aa15fd63c1b24eb0b63	01/14/2019

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment

Owner First Name: Seun		Owner Middle Name:		Owner Last Name: Adedeji		Owner Suffix:	
Entity State Business Identification Number: 1033843C8C				Entity Federal Tax Identification Number (EIN/TIN) or Foreign Business ID: 82-0898607			
Entity Legal Name: Elev8 Cannabis Inc.				Entity DBA: Elev8 Cannabis			
Entity Description: Marijuana dispensary							
Entity Phone: 458-210-2810		Entity Email: accounting@elev8cannabis.com		Entity Website: www.elev8cannabis.com			
Entity Address 1: 1409 Oak St				Entity Address 2:			
Entity City: Eugene		Entity State: OR		Entity Zip Code: 97401		Entity Country: United States	
Entity Mailing Address 1: 1409 Oak St				Entity Mailing Address 2:			
Entity Mailing City: Eugene		Entity Mailing State: OR		Entity Mailing Zip Code: 97401		Entity Mailing Country: United States	

BUSINESS INTEREST DOCUMENTATION

Supporting Document:

Document Category	Document Name	Type	ID	Upload Date
Documentation of Interest	20212022 Renewal Certificate_20210514150957810 (1).pdf	pdf	61d73df625efbc08930082da	01/06/2022

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

INDIVIDUAL INTEREST DOCUMENTATION

No documents uploaded

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Bond or Escrow Documentation:

Document Category	Document Name	Type	ID	Upload Date
Documentation of Escrow Account	BRF Client Statement of Account.pdf	pdf	5dcaeffd40e348579197be9c	11/12/2019

Property Interest Documentation:

Document Category	Document Name	Type	ID	Upload Date
Agreement to Give Title	Elev8 - Property Control.pdf	pdf	5c34ebee8f456971f8452616	01/08/2019
Legal Title	SSZ Real Estate Holding LLC - Deed.pdf	pdf	5cddc0e3622b7c1357f6df10	05/16/2019

Establishment Address 1: 243 Main Street

Establishment Address 2:

Establishment City: Athol

Establishment Zip Code: 01331

Approximate square footage of the establishment: 1200

How many abutters does this property have?: 36

Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Municipal Financial Benefit Documentation:

Document Category	Document Name	Type	ID	Upload Date
Statement from the Chief Executive Officer of the Municipality	HCA.pdf	pdf	61ddd00c8dbcc30906635602	01/11/2022

Plan to Remain Compliant:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant	ELEV8 - Major Modification #1 - Operating Hours - FINAL and SIGNED.pdf	pdf	61d742dc25efbc0893008329	01/06/2022
Plan to Remain Compliant	Plan Local Zoning - Athol (1).pdf	pdf	61d742fcea5b88086e767d3f	01/06/2022

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Athol Approved HCA Cert Elev8 signed 8-7-18 (1).pdf	pdf	5b786b815a6f093923e4fa69	08/18/2018
Plan to Remain Compliant with Local Zoning	Elev8 - Athol - Plan to Remain Compliant with Local Zoning.pdf	pdf	5c34ee53e96db37a99be4ff4	01/08/2019
Community Outreach Meeting Documentation	Elev8 - Community Outreach - Updated.pdf	pdf	5c5dcde9eadf341230f65c3e	02/08/2019

Municipal Cost Documentation:

Document Category	Document Name	Type	ID	Upload Date
Cost Letter to Municipality	Letter to Host Community Requesting Cost.png	png	61ddce5071cb790879588a20	01/11/2022
Cost Letter to Municipality	Letter to Host Community Requesting Cost Cont..png	png	61ddce5a25efbc0893009976	01/11/2022
No Municipal Response Attestation	CCC Athol Application Letter.pdf	pdf	61ddcf58e95b8c088880ed5a	01/11/2022
Cost Letter to Municipality	2022-01_Municipal_Financial_Benefit_Documentation (1).pdf	pdf	61fc71e88dbcc3090663d4c5	02/03/2022
No Municipal Response Attestation	2022-01_Attestation_Letter.pdf	pdf	61fc71e925efbc08930118ba	02/03/2022

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$3

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan Positive Impact - Athol.pdf	pdf	5dc48ecc0f35e05798b35d46	11/07/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:	Other Role:			
First Name: Oluwaseun	Middle Name:	Last Name: Adedeji	Suffix:	Former Last Name:
Alias 1:	Alias 2:	Alias 3:		
Phone: 817-323-5586	Email: seun@elev8cannabis.com			
Primary Address 1: 1409 Oak St	Primary Address 2:			
Primary City: Eugene	Primary State: OR	Primary Zip Code: 97401	Years at this Address: 1	
Date of Birth: 05/23/1993	Last Four Digits of Social Security Number: 2673			
RMD Association: Not associated with an RMD				
Background Question: no				
Description of Background Events:				

BACKGROUND CHECK SUPPORTING DOCUMENTATION

Supporting Documentation:

Document Category	Document Name	Type	ID	Upload Date
Other US State Driver's License	Adedeji DL.jpeg	jpeg	5c5ed4e12724e81b52559a56	02/09/2019
Release authorization form	KatherineTener_release.pdf	pdf	5d94ec7108d9401ae68c5c09	10/02/2019
Massachusetts CORI Authorization Form	KatherineTener_CORI.pdf	pdf	5d94ec72a489aa1afc400b54	10/02/2019
Disclosure and acknowledgement form	KatherineTener_Disclosure.pdf	pdf	5d94ec732e767115bf437c7d	10/02/2019
Other US State ID Card	Katherine Tener ID.jpg	jpeg	5dc49c9b66a32657cfbd9b40	11/07/2019
IVES form 4506-T	KatherineTener_IVES.pdf	pdf	5dc49cb1170b4c5353e38f5a	11/07/2019
Release authorization form	SeunAdedeji_Release.pdf	pdf	5dc4a4207aad8653363bbbea	11/07/2019
IVES form 4506-T	SeunAdedeji_IVES.pdf	pdf	5dc4a42266a32657cfbd9b61	11/07/2019
Disclosure and acknowledgement form	SeunAdedeji_disclosure.pdf	pdf	5dc4a42374bb15534cd4b2af	11/07/2019
Massachusetts CORI Authorization Form	SeunAdedeji_CORI.pdf	pdf	5dc4a425b4f83557d6cc5679	11/07/2019

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Massachusetts department of revenue.pdf	pdf	5b7b0e2a8d67cc394b81b724	08/20/2018
Articles of Organization	Massachusetts Article of organization .pdf	pdf	5b7b12fd5a6f093923e4fb70	08/20/2018
Bylaws	Elev8 Member-Managed Operating Agreement.doc .pdf	pdf	5b7c4ff8d389b22d7bd63cab	08/21/2018
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing.pdf	pdf	5b7d887b03a477392d0a2f61	08/22/2018
Bylaws	C corp.pdf	pdf	5d9629806eb01d1b28fafd38	10/03/2019
Bylaws	Elev8 Cannabis - Bylaws.pdf	pdf	5d96298367e7d91adfc6764a	10/03/2019
Bylaws	Elev8 Cannabis - Plan of Conversion.pdf	pdf	5d962983d471f115eb599b98	10/03/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	2022-01-06_Certificate of Good Standing Mass UI Dept.pdf	pdf	61ddd06a7c2bdd089a1ed725	01/11/2022
Secretary of Commonwealth - Certificate of Good Standing	22010130490.pdf	pdf	61ddd0818dbcc3090663560c	01/11/2022
Department of Revenue - Certificate of Good standing	Certificate of Good Standing Massachusetts - Elev8 Cannabis Inc. 032222.pdf	pdf	623a52982ff0a70007d6efb2	03/22/2022

Massachusetts Business Identification Number: 001337824

Doing-Business-As Name: N/A

DBA Registration City: Athol

BUSINESS PLAN

No documents uploaded

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	Elev8 - Athol - Security Plan.pdf	pdf	5c34f845550ac07ab72aec6c	01/08/2019
Prevention of diversion	Elev8 - Athol - Prevention of Diversion.pdf	pdf	5c34f8a46f99f37acbf31471	01/08/2019
Storage of marijuana	Elev8 - Athol - Storage of Marijuana.pdf	pdf	5c34fb137f373a7220c2e132	01/08/2019
Transportation of marijuana	Elev8 - Athol - Transportation of Marijuana.pdf	pdf	5c34fba37341b97aa37331fe	01/08/2019
Inventory procedures	Elev8 - Athol - Inventory Procedures.pdf	pdf	5c34fc1a7f373a7220c2e138	01/08/2019
Quality control and testing	Elev8 - Athol - Quality Control and Testing.pdf	pdf	5c34fc86e96db37a99be5049	01/08/2019
Dispensing procedures	Elev8- Athol -Dispensing Procedures (for Retailers).pdf	pdf	5c34fcfb16fa0d7202cead32	01/08/2019

Personnel policies including background checks	Elev8 - Athol - Personnel Policies Including Background Checks.pdf	pdf	5c34fd606f99f37acbf31486	01/08/2019
Record Keeping procedures	Elev8 - Athol - Recordkeeping Procedures.pdf	pdf	5c34fe3416fa0d7202cead40	01/08/2019
Maintaining of financial records	Elev8 - Athol - Maintaining of Financial Records.pdf	pdf	5c34fe846f99f37acbf31490	01/08/2019
Plan for obtaining marijuana or marijuana products	Elev8 - Athol - Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	5c34ff5e7f373a7220c2e14c	01/08/2019
Qualifications and training	Elev8 - Athol - Qualifications and Training.pdf	pdf	5c34ffd6a2404e71ee7e6709	01/08/2019
Restricting Access to age 21 and older	Elev8 - Athol - Plan for Restricting Access to Age 21 and Older .pdf	pdf	5c35004d21b7c17a8fe2f426	01/08/2019
Diversity plan	Elev8 - Diversity Plan.pdf	pdf	5dd5aa70fd468857b99bcf80	11/20/2019
Diversity plan	2022-01_License_Renewal_Notice (1).pdf	pdf	61fb0d1f7c2bdd089a1f4e91	02/02/2022
Maintaining of financial records	Payment Plan.pdf	pdf	61fb0d2135cb3e08f721e76c	02/02/2022

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

Notification: I Understand

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.: I Agree

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.: I Agree

I certify that all information contained within this renewal application is complete and true.: I Agree

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

Progress or Success Goal 1

Documentation:

Document Category	Document Name	Type	ID	Upload Date
Letter(s) from Organizations or Other Third-Parties	Screen Shot 2022-01-11 at 10.48.15 AM.png	png	61ddd12a7c2bdd089a1ed731	01/11/2022

Description of Progress or Success: Elev8 Cannabis in Athol has been officially open through the midst of the COVID pandemic and celebrated our successful 1st year together in the Athol community on October 15, 2021. As we prepare our license renewal as an active retailer, we see the opportunity and the goals set forth in the Positive Impact Plan. Our CEO Seun Adedeji, was able to be a guest lecturer for Roxbury Community College covering the implementation stages in the cannabis industry, how to navigate growing your own business and building social equity organically. We plan to bring things more local, per the action plan, as we gain our footing, standardize our growing team. We have full intent in bringing CEO fireside conversations, virtual, social safe & distant Zoom meet ups for all things Cannabis, ask your budtenders series, etc. in order to uphold this positive impact in an innovative way during these difficult times. We recognize the pivot we all must take, in navigating the COVID pandemic and its surges, while also providing support and knowledge to our local communities about cannabis.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Documentation:

Document Category	Document Name	Type	ID	Upload Date
Employment Reports	felisha riley.pdf	pdf	5fd946dbc3fca007695aab2f	12/15/2020
Employment Reports	pierce ellison.pdf	pdf	5fd946e3fda1250795585db5	12/15/2020
Employment Reports	naomi granger.JPG	jpeg	5fdd40a009cfae0810fd1037	12/18/2020
Employment Reports	Screen Shot 2022-01-11 at 10.54.09 AM.png	png	61ddd2b7879c73091c81006a	01/11/2022
Employment Reports	Screen Shot 2022-01-11 at 10.54.39 AM.png	png	61ddd2bf71cb790879588a64	01/11/2022
Other	2022-01_License_Renewal_Notice (1).pdf	pdf	61fb0c1f71cb790879590150	02/02/2022
Other	Payment Plan.pdf	pdf	61fb16a725efbc08930110ea	02/02/2022

Description of Progress or Success: Elev8 Athol has from its beginning stages of hiring, upheld the goal of having about 50% of staffing represent equity among minorities, including but not limited to women, veterans, LGBTQ+, and people with disabilities. In the first rounds of our hiring, after opening the Athol license location, we have onboarded BIPOC, women and LGBTQ+ community members. To progress and continue expansion within the Diversity Plan, we aim to continue diversifying the applicants we attract during hiring surges, as well as make it the forefront of what we speak about during community outreach/educational events or seminars.

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 10:00 PM
Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 11:00 PM
Saturday From: 9:00 AM	Saturday To: 11:00 PM
Sunday From: 10:00 AM	Sunday To: 8:00 PM

EMERGENCY CONTACTS

Emergency Contact 1

First Name: Seun **Last Name:** Adedeji
Email: seun@elev8cannabis.com **Phone:** 817-323-5586

Emergency Contact 2

First Name: Naomi **Last Name:** Grainger
Email: naomi@elev8cannabis.com **Phone:** 917-291-1161

FEE WAIVER

Social Equity Program or Economic Empowerment Fee Waiver Request: no

Social Equity Program or Economic Empowerment Number:



January 21, 2020

Elev8 Cannabis, Inc.
MRN282630
seun@elev8cannabis.com

NOTICE: PROVISIONAL LICENSE

WHY ARE YOU RECEIVING THIS NOTICE?

This letter provides notice that the Cannabis Control Commission (“Commission”) approved the issuance of a provisional license subject to the conditions listed below. A provisional license authorizes the applicant to develop, but not operate, the proposed Marijuana Establishment identified in the application which is as follows:

Elev8 Cannabis, Inc.
Retail
217 Main Street, Williamstown, MA 01267

Prior to the issuance of a final license, Commission staff will evaluate whether the applicant has satisfied the following conditions and otherwise complied with the statutory and regulatory requirements for licensure:

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

WHAT ARE YOUR NEXT STEPS?

To complete the process for obtaining a provisional license, the applicant must access the license fee payment packet for its approved application in the Massachusetts Cannabis Industry Portal (“MassCIP”). MassCIP will provide instructions for payment and calculate the license fee to be paid. Once your license fee is approved, this letter will serve as your provisional license subject to the conditions listed above. This notice shall be posted in a conspicuous location on the premises of the proposed Marijuana Establishment.

After review and processing of the applicable license fee, the licensee shall submit agent registration applications for all board members, executives, directors, managers, employees and volunteers. The licensee will need to verify their license number which will be the application number listed above without the “N” (for example, application number MCN456789 will have the license number MC456789). Agent applications are reviewed within 7-10 business days. Guidance on agent registration requirements is available on our website at: <https://mass-cannabis-control.com/guidancedocuments/>. Once one of the



owners have been approved as a registered agent, you may contact Metrc at (877) 566-6506 and request the process for obtaining administrator credentials. Please note that the Metrc Industry Identification Number needed will populate overnight and be available through MassCIP the next day.

If the licensee plans to build or renovate, it is required to submit an architectural plan and receive approval from the Commission **prior** to work being performed pursuant to 935 CMR 500.103(1)(a). If building or renovations of a building are required or expected to be performed, please complete an Architectural Plan Review Request form located on our website at: <https://mass-cannabis-control.com/wp-content/uploads/2018/12/FORM-ARCHITECTURAL-PLAN-REVIEW-REQUEST.pdf>.

If no building or renovations are needed, or once all construction has been completed, the licensee is subject to inspections by Commission staff prior to being eligible for consideration of a final license. The licensee must officially request its initial inspection called a Post-Provisional License Inspection ("PPLI"). In order to officially request a PPLI, the licensee must submit the following documents: (1) Request for PPLI Form and (2) a detailed floor plan of the Marijuana Establishment that shows all entrances/exits, any loading bays, limited access areas including the identification of rooms utilized for cultivation (if applicable), and retail operations that will be accessible by the public (if applicable).

The Request for PPLI Form is attached to this notice. Please complete the form and submit it, along with the detailed floor plan, to inspections@cccmass.com. Upon receipt of the request and supporting documentation, you will receive notice from Commission staff informing you of the date, time, and location of the inspection.

Please be advised that the issuance of a provisional license is based on the materials or information supplied in support of an application, and certain organizational changes must be approved by the Commission. 935 CMR 500.104(1). The provisional licensee must also provide timely notice to the Commission if it discovers that application information has changed, or that the information provided was misleading, incorrect, false, or fraudulent. 935 CMR 500.104(2). Finally, a provisional license may not be assigned or transferred without prior approval by the Commission. 935 CMR 500.103(2)(b). The failure to comply with these or other regulatory requirements may result in the suspension or revocation of a provisional license and the denial of a final license. 935 CMR 500.400 and 500.450. **Please note that the Marijuana Establishment shall not possess marijuana for adult-use operations prior to being approved for a final license.**

Please be advised that the Commission promulgated revised regulations effective as of November 1, 2019. All licensees must be in compliance with the most recent version of the Commission's regulations prior to requesting their PPLI. The Commission's regulations can be found here: <https://mass-cannabis-control.com/the-laws/>.

If there are any questions with regards to this notice, please contact the Commission at licensing@cccmass.com.

Sincerely,



Shawn Collins
Executive Director



REQUEST FOR POST-PROVISIONAL LICENSE INSPECTION (“PPLI”)

Please use this form to officially request a PPLI. This form may be used to request inspections on multiple licenses provided that all the listed licenses operate at the same location. Please submit an additional request for a license located at a different location.

Name of the Marijuana Establishment:

Inspection Requested on License Number(s):

Location of Marijuana Establishment:

Contact Information:

As a Person with Direct or Indirect Control over the Marijuana Establishment, I certify that the Marijuana Establishment is in full compliance with 935 CMR 500 (dated 11/1/19), and more specifically, I certify full compliance with the following: *(please initial all that apply for the license(s) in which an inspection is being requested)*

1.

☐

General Security Requirements

- a. Surveillance video coverage of all areas that will contain marijuana;
- b. Alarm systems are active and working properly;
- c. Lock and entry control systems are in good working order;
- d. All limited access areas are clearly and appropriately identified;
- e. Identification badges are utilized for all individuals within the establishment;
- f. Visitor logs are utilized and maintained appropriately; and
- g. All other requirements under 935 CMR 500.110.

2.

☐

Storage of Marijuana Requirements

- a. All storage areas are clear, orderly, and free from infestation;
- b. All storage areas have adequate lighting and ventilation; and
- c. All other requirements under 935 CMR 500.105(3).

3.

☐

Transportation Requirements

- a. All vehicles have GPS devices;
- b. All marijuana that will be transported within the vehicles will be contained within a secured, locked storage compartment that is not easily removable from the vehicle; and
- c. All other requirements under 935 CMR 500.105(13).

☐

4. **Operating Procedures and Record-Keeping Requirements**
- a. The following documents are kept appropriately and will be made available for inspection:
 - i. Business records;
 - ii. Employee and employee training records;
 - iii. All contractual agreements the establishment is currently subject to;
 - iv. Standard Operating Procedures Manual;
 - v. All other records required under 935 CMR 500.105(9) and 500.160.
5. ☐ **Local Compliance and Business Information**
- a. Local permits, i.e. building permit, certificates of occupancy, special permits, have been obtained and are ready for verification; and
 - b. Limited liability insurance policy has been obtained and is ready for verification.
6. ☐ **Advertising and Marketing Requirements**
- a. All marketing practices, advertising, and logos are in compliance with 935 CMR 500.105(4).
7. ☐ **Specific Additional Requirements per License Type**
- a. Cultivators: All requirements under 935 CMR 500.120;
 - b. Product Manufacturers: All requirements under 935 CMR 500.105(5), 500.130, and 500.150.
 - c. Retailers: All requirements under 935 CMR 500.140 including, but not limited to, adult-use consumer educational materials; and
 - d. Independent Testing Laboratories: All requirements under 935 CMR 500.160.
8. ☐ **Provisional License Conditions**
- a. All conditions of the provisional license have been satisfied. Documentation to show compliance is available and ready for Commission staff to review during the inspection.

Name of Person with Direct or Indirect Control over the Marijuana Establishment:

Signature of Person with Direct or Indirect Control over the Marijuana Establishment:

Date of Request:

Note: It is the responsibility of every Marijuana Establishment to ensure compliance with 935 CMR 500. To ensure overall compliance, please refer to the regulations located at: <https://mass-cannabis-control.com/the-laws/>.

Please email this PPLI request, along with a detailed floor plan, to inspections@cccmass.com when ready for an inspection.





January 21, 2020

Elev8 Cannabis, Inc.
MRN281383
seun@elev8cannabis.com

NOTICE: PROVISIONAL LICENSE

WHY ARE YOU RECEIVING THIS NOTICE?

This letter provides notice that the Cannabis Control Commission (“Commission”) approved the issuance of a provisional license subject to the conditions listed below. A provisional license authorizes the applicant to develop, but not operate, the proposed Marijuana Establishment identified in the application which is as follows:

Elev8 Cannabis, Inc.
Retail
14 South Main Street, Orange, MA 01364

Prior to the issuance of a final license, Commission staff will evaluate whether the applicant has satisfied the following conditions and otherwise complied with the statutory and regulatory requirements for licensure:

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

WHAT ARE YOUR NEXT STEPS?

To complete the process for obtaining a provisional license, the applicant must access the license fee payment packet for its approved application in the Massachusetts Cannabis Industry Portal (“MassCIP”). MassCIP will provide instructions for payment and calculate the license fee to be paid. Once your license fee is approved, this letter will serve as your provisional license subject to the conditions listed above. This notice shall be posted in a conspicuous location on the premises of the proposed Marijuana Establishment.

After review and processing of the applicable license fee, the licensee shall submit agent registration applications for all board members, executives, directors, managers, employees and volunteers. The licensee will need to verify their license number which will be the application number listed above without the “N” (for example, application number MCN456789 will have the license number MC456789). Agent applications are reviewed within 7-10 business days. Guidance on agent registration requirements is available on our website at: <https://mass-cannabis-control.com/guidancedocuments/>. Once one of the



owners have been approved as a registered agent, you may contact Metrc at (877) 566-6506 and request the process for obtaining administrator credentials. Please note that the Metrc Industry Identification Number needed will populate overnight and be available through MassCIP the next day.

If the licensee plans to build or renovate, it is required to submit an architectural plan and receive approval from the Commission **prior** to work being performed pursuant to 935 CMR 500.103(1)(a). If building or renovations of a building are required or expected to be performed, please complete an Architectural Plan Review Request form located on our website at: <https://mass-cannabis-control.com/wp-content/uploads/2018/12/FORM-ARCHITECTURAL-PLAN-REVIEW-REQUEST.pdf>.

If no building or renovations are needed, or once all construction has been completed, the licensee is subject to inspections by Commission staff prior to being eligible for consideration of a final license. The licensee must officially request its initial inspection called a Post-Provisional License Inspection ("PPLI"). In order to officially request a PPLI, the licensee must submit the following documents: (1) Request for PPLI Form and (2) a detailed floor plan of the Marijuana Establishment that shows all entrances/exits, any loading bays, limited access areas including the identification of rooms utilized for cultivation (if applicable), and retail operations that will be accessible by the public (if applicable).

The Request for PPLI Form is attached to this notice. Please complete the form and submit it, along with the detailed floor plan, to inspections@cccmass.com. Upon receipt of the request and supporting documentation, you will receive notice from Commission staff informing you of the date, time, and location of the inspection.

Please be advised that the issuance of a provisional license is based on the materials or information supplied in support of an application, and certain organizational changes must be approved by the Commission. 935 CMR 500.104(1). The provisional licensee must also provide timely notice to the Commission if it discovers that application information has changed, or that the information provided was misleading, incorrect, false, or fraudulent. 935 CMR 500.104(2). Finally, a provisional license may not be assigned or transferred without prior approval by the Commission. 935 CMR 500.103(2)(b). The failure to comply with these or other regulatory requirements may result in the suspension or revocation of a provisional license and the denial of a final license. 935 CMR 500.400 and 500.450. **Please note that the Marijuana Establishment shall not possess marijuana for adult-use operations prior to being approved for a final license.**

Please be advised that the Commission promulgated revised regulations effective as of November 1, 2019. All licensees must be in compliance with the most recent version of the Commission's regulations prior to requesting their PPLI. The Commission's regulations can be found here: <https://mass-cannabis-control.com/the-laws/>.

If there are any questions with regards to this notice, please contact the Commission at licensing@cccmass.com.

Sincerely,



Shawn Collins
Executive Director



REQUEST FOR POST-PROVISIONAL LICENSE INSPECTION (“PPLI”)

Please use this form to officially request a PPLI. This form may be used to request inspections on multiple licenses provided that all the listed licenses operate at the same location. Please submit an additional request for a license located at a different location.

Name of the Marijuana Establishment:

Inspection Requested on License Number(s):

Location of Marijuana Establishment:

Contact Information:

As a Person with Direct or Indirect Control over the Marijuana Establishment, I certify that the Marijuana Establishment is in full compliance with 935 CMR 500 (dated 11/1/19), and more specifically, I certify full compliance with the following: *(please initial all that apply for the license(s) in which an inspection is being requested)*

1. ☐ **General Security Requirements**
 - a. Surveillance video coverage of all areas that will contain marijuana;
 - b. Alarm systems are active and working properly;
 - c. Lock and entry control systems are in good working order;
 - d. All limited access areas are clearly and appropriately identified;
 - e. Identification badges are utilized for all individuals within the establishment;
 - f. Visitor logs are utilized and maintained appropriately; and
 - g. All other requirements under 935 CMR 500.110.
2. ☐ **Storage of Marijuana Requirements**
 - a. All storage areas are clear, orderly, and free from infestation;
 - b. All storage areas have adequate lighting and ventilation; and
 - c. All other requirements under 935 CMR 500.105(3).
3. ☐ **Transportation Requirements**
 - a. All vehicles have GPS devices;
 - b. All marijuana that will be transported within the vehicles will be contained within a secured, locked storage compartment that is not easily removable from the vehicle; and
 - c. All other requirements under 935 CMR 500.105(13).
4. ☐ **Operating Procedures and Record-Keeping Requirements**



- a. The following documents are kept appropriately and will be made available for inspection:
 - i. Business records;
 - ii. Employee and employee training records;
 - iii. All contractual agreements the establishment is currently subject to;
 - iv. Standard Operating Procedures Manual;
 - v. All other records required under 935 CMR 500.105(9) and 500.160.

5. ☐ **Local Compliance and Business Information**

- a. Local permits, i.e. building permit, certificates of occupancy, special permits, have been obtained and are ready for verification; and
- b. Limited liability insurance policy has been obtained and is ready for verification.

6. ☐ **Advertising and Marketing Requirements**

- a. All marketing practices, advertising, and logos are in compliance with 935 CMR 500.105(4).

7. ☐ **Specific Additional Requirements per License Type**

- a. Cultivators: All requirements under 935 CMR 500.120;
- b. Product Manufacturers: All requirements under 935 CMR 500.105(5), 500.130, and 500.150.
- c. Retailers: All requirements under 935 CMR 500.140 including, but not limited to, adult-use consumer educational materials; and
- d. Independent Testing Laboratories: All requirements under 935 CMR 500.160.

8. ☐ **Provisional License Conditions**

- a. All conditions of the provisional license have been satisfied. Documentation to show compliance is available and ready for Commission staff to review during the inspection.

Name of Person with Direct or Indirect Control over the Marijuana Establishment:

Signature of Person with Direct or Indirect Control over the Marijuana Establishment:

Date of Request:

Note: It is the responsibility of every Marijuana Establishment to ensure compliance with 935 CMR 500. To ensure overall compliance, please refer to the regulations located at: <https://mass-cannabis-control.com/the-laws/>.

Please email this PPLI request, along with a detailed floor plan, to inspections@cccmass.com when ready for an inspection.



Marijuana Retailer (Deleted)			#MR282630
Business Name:	Elev8 Cannabis Inc.	Exhibit A-4	Payment Received: \$0.00
Tax Identification Number:	83-3358397		Payment Required: \$10,000.00
Business Email Address:	Seun@elev8cannabis.com		Original Issued Date: View User
Business Phone Number:	817-323-5586		Issued Date:
Mailing Address:	243 Main Street Athol MA 01331		Expiration Date:
Business Address:	243 Main Street Athol MA 01331		Suspended Start Date: March 25, 2023

License Data	Applications	Events	Payments	Inspections	Terms and Conditions	License History	Archives
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MP	General Note
	Event date: 03/29/2023, 4:42:59 PM (GMT-4)
	Event created: over 2 years ago on 03/29/2023, 4:42:59 PM (GMT-4)
	Event last updated: over 2 years ago by Matthew Poussard on 03/29/2023, 4:42:59 PM (GMT-4)
	Comment: This license was set to DELETED to because it was suspended on 03/25/2023 while in the Payment Pending Status.

Marijuana Retailer (Deleted)			#MR281383
Business Name:	Elev8 Cannabis, Inc.	Exhibit A-5	Payment Received: \$0.00
Tax Identification Number:	83-3358397		Payment Required: \$10,000.00
Business Email Address:	seun@elev8cannabis.com		Original Issued Date: View User
Business Phone Number:	817-323-5586		Issued Date:
Mailing Address:	243 Main Street Athol MA 01331		Expiration Date:
Business Address:	243 Main Street Athol MA 01331		Suspended Start Date: March 25, 2023

License Data	Applications	Events	Payments	Inspections	Terms and Conditions	License History	Archives
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MP	General Note
	Event date: 03/29/2023, 4:43:12 PM (GMT-4)
	Event created: over 2 years ago on 03/29/2023, 4:43:12 PM (GMT-4)
	Event last updated: over 2 years ago by Matthew Poussard on 03/29/2023, 4:43:12 PM (GMT-4)
	Comment: This license was set to DELETED to because it was suspended on 03/25/2023 while in the Payment Pending Status.

FINAL

TOWN OF ATHOL
MINUTES OF THE BOARD OF SELECTMEN
October 17, 2023
7:00 p.m. Open Session
Room 21, Athol Town Hall

Present: Andrew J. Sujdak, Chairman
Kala S. Fisher, Vice Chairman
Stephen R. Raymond, Selectman
Rebecca J. Bialecki, Selectman
Brian J. Dodge, Selectman
Shaun A. Suhoski, Town Manager
John Barrett, Town Counsel

Call to Order: Chair Sujdak called the meeting to order and asked Patrick Keeney to lead the Pledge of Allegiance.

Minutes: Rebecca Bialecki moved to accept the minutes of the **October 3, 2023** Board of Selectmen meeting. Kala Fisher seconded the motion.
Motion carried: 5/0

Permits & Licenses: N/A

Public Comment: N/A

Public Hearing: **Transfer of Liquor License hearing, 7:10 p.m., Fine Foods Inc, 512 (522) Main Street:** Chair Sujdak called the hearing to order at 7:36 p.m. for the application that was submitted by Fine Foods Inc attorney for the transfer of the Wine and Malt pouring license from the previous owners, Athol Realty Inc dba: Athol House of Pizza.
Motion: *Kala Fisher motioned to approve the transfer of the Wine and Malt pouring license from Athol Realty Inc to Fine Foods Inc, 512 (522) Main Street, dba: Athol House of Pizza. Rebecca Bialecki seconded the motion.*
Motion carried: 5/0
Chair Sujdak asked if anyone was present to speak on this hearing, no one stepped forward so he closed the hearing at 7:38 p.m.

Town Department and Comm. Business:

Town Manager Request; Fire Department Staffing Work Group: Shaun explained that given the failure of the July 31, 2023 Special Election for a Prop 2 ½ Override, we still have a staffing shortage at the AFD and want to get ahead before budget season arrives after the first of the year. Shaun said they are looking for two paramedic/ff to hire and is looking to establish the work group with the following participation:

One or two members designated from the Select Board

One or two members designated from the FWAC

One or two members designated from Capital Planning Committee

General Business:

**One or two members designated by the firefighter local union, and
The Fire Chief, Town Manager and Town finance team staff as needed**
Selectman Bialecki and Selectman Dodge volunteered to be on this work group
LifePath, Inc: Age and Dementia Friendly Project survey results:

Lynn Feldman, Director of Community Services for LifePath presented the BOS with a slide show presentation on the survey results, going town to town to give “town specific” results, highlighting the following:

- ✓ The AARP suggests that there are 8 Domains of Livability: Outdoor spaces and buildings, Housing, Transportation, Social Participation, Health Services & Community Supports, Respect & Social Inclusion, Civic Participation & Employment, Communication & Information.
- ✓ Athol residents made up 118 responses out of 1,981 total from across 30 towns
- ✓ Demographics of survey respondents
- ✓ Suggestions on how to improve our community for the aging population
- ✓ Explanation of the action plan based on the results of the survey
- ✓ Invitation to the Board for the action plan presentation and road map for the town to consider

Lynn then handed out packets with complete data from the survey and explained the weighted results.

ARPA Fuel Assistance Program Dates: Shaun requested that we start the program for this season tomorrow as requests and inquiries are being fielded by the agencies that assisted with this program last year.

Motion: Kala Fisher motioned to start the ARPA Fuel Assistance Program for 2023-2024 season as of Wednesday, October 18, 2023. Stephen Raymond seconded the motion.

Motion carried: 5/0

Elev8 HCA Hearing: Attorney Barrett explained that he did notify the owner of Elev8 Cannabis, LLC as well as his attorney via email and regular mail of this hearing tonight. Shaun explained the HCA and what the HCA section 2 reads in the “Term and Termination” portion, specifically stating “and shall expire if the company ceases to do business in the Town”. Shaun said that the business stopped on March 25, 2023, almost 7 months ago and at that time in March he had 21 days to file an appeal and no appeal was filed. He reminded the BOS that at the 1st meeting in September Mr. Adedeji came before the BOS and the BOS gave him time to compose any evidence that he is working on reinstating his license. Shaun confirmed that all efforts were made to notify Mr. Adedeji including knocking on the business door earlier today and given the lack of evidence that he is attempting to reinstate his license, Shaun recommends termination of the HCA due to not conducting business since March. Selectman Dodge asked about the product in the building and what happens to it now.

Motion: Rebecca Bialecki motioned to declare that the HCA between Town of Athol and Elev8 Cannabis, LLC be terminated under Section 2 of said agreement due to the fact that Elev8 Cannabis, LLC has ceased to do business in Town effective October 17, 2023. Stephen Raymond seconded the motion.

Motion carried: 5/0

The Board requested that Shaun contact the CCC to find out next actions for Elev8 including securing the inventory, if any.

Selectmen's Reports:

Rebecca Bialecki had nothing for tonight

Kala Fisher had nothing for tonight

Brian Dodge like the LifePath presentation and suggested looking into potential Elderly housing at the Bidwell property, selling off a portion of the land for development for said housing, using the funds from the sale of that portion of land to develop bike paths, trails and renovation/rehab on the barn. Selectman Fisher wanted to remind everyone that any decision for usage of the Bidwell property still goes to town meeting floor for the voters to decide.

Stephen Raymond had nothing for tonight

Chairman's Report:

Chair Sujdak started with the Chief of Police recommending again this year that Trick or Treating be held on October 31, 2023 from 5:30 – 8:00 p.m.

Motion: Kala Fisher motioned to approve the recommendation from the Chief of Police to hold Trick or Treating on October 31, 2023 from 5:30 – 8:00 p.m. Rebecca Bialecki seconded the motion.

Motion carried: 5/0

Chair Sujdak mentioned the importance of attending all town meetings and to please show up on Monday, October 23, 2023 at 7:00 p.m. for the Fall Town Meeting as there are time sensitive articles that need to be decided and we need a quorum of 87 voters.

Town Manager's Report:

Shaun said the Town Hall cupola has been removed, a small piece of the copper top was saved as an artifact. He continued to say that the new cupola is tentatively scheduled to be installed next week and the roof has been signed off by the architect. The clock is being completed in St. Lois, MO and we do not have a date yet for delivery but will be ready for the dedication of the 100th Anniversary of Memorial Building. Shaun added that he met with both AFD and APD Chief's to discuss a possible regional dispatch here in Athol with a neighboring community.

Town Counsel's Report:

Attorney Barrett said he has been working on the FTM warrant articles and urged voters to please attend as at least one article about the 5 Points Project involves a very large sum of state money (\$8.5 million) for the road project and we would hate to lose that funding.

Adjournment:

Kala Fisher motioned to adjourn at 7:55 p.m. Rebecca Bialecki seconded the motion. ***Motion carried: 5/0***

Respectfully submitted,

Bridget A. Armentrout
Clerk



August 12, 2022

Elev8 Cannabis, Inc.
MR281810
Seun@elev8cannabis.com

Date of Observation: August 11, 2022

NOTICE: DEFICIENCY STATEMENT

WHY ARE YOU RECEIVING THIS NOTICE?

Commission staff identified deficiencies in the Marijuana Establishment / Marijuana Treatment Center that do not comply with applicable laws and regulations. The list of deficiencies are as follows:

Regulation:	Deficiency:
935 CMR 500.110(1)(b)	<p><i>(1) General Requirements. A Marijuana Establishment shall implement sufficient security measures to deter theft of Marijuana and Marijuana Products, prevent unauthorized entrance into areas containing Marijuana and Marijuana Products and ensure the safety of Marijuana Establishment employees, Consumers and the general public. Security measures taken by the Licensee to protect the Premises, employees, Marijuana Establishment Agents, Consumers and general public shall include, but not be limited to, the following:</i></p> <p><i>(b) Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by 935 CMR 500.000 and its enabling statute are allowed to remain on the Premises;</i></p> <p>Deficiency: On August 8, 2022, Elev8 Cannabis, Inc. owner Seun Adedeji stated in an email to the Commission that he had “crashed at the shop” after working late. On August 11, 2022, Adedeji confirmed in an email to Commission Enforcement staff (“ES”) that he had remained on the Premises to sleep on or around August 8, 2022. Sleeping at Marijuana Establishment is not an activity expressly or by necessary implication permitted by 935 CMR</p>



	500.000 and its enabling statute are allowed to remain on the Premises.
935 CMR 500.170(1)	<p><i>(1) Marijuana Establishments and Marijuana Establishment Agents shall comply with all local rules, regulations, ordinances, and bylaws.</i></p> <p>Deficiency: On August 11, 2022, Athol Building Commissioner Robert Legare informed ES that sleeping at the Marijuana Establishment is not a permitted use of the Premises under the Certificate of Occupancy granted to the licensee.</p>

WHAT ARE MY NEXT STEPS?

The Marijuana Establishment / Marijuana Treatment Center shall submit to the Commission a written plan of correction for any violations cited in this deficiency statement within ten (10) business days after receipt of this statement.

The plan of correction shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

The Commission shall review the plan of correction for compliance with all applicable laws and regulations and shall notify the Marijuana Establishment / Marijuana Treatment Center of either the acceptance or rejection of the plan.

Nothing contained herein or upon approval of a plan of correction shall be deemed a waiver of the Commission conducting further investigative activities or taking administrative action against the license issued to operate a Marijuana Establishment / Marijuana Treatment Center.

Please send your plan of correction to your Timothy.Barwise@cccmass.com within ten (10) business days of the date of this notice.



IMPORTANT! This document(s) contains important information that could impact your license application or license. It is critical that you understand the information in this document. Please have it translated immediately.

Spanish:

¡ATENCIÓN! Este documento incluye información importante que podría afectar su licencia o solicitud de licencia. Es fundamental que entienda la información en este documento. Por favor, traducir de inmediato.

Traditional Chinese:

重要信息！ 本文檔包含可能影響您的執照申請或執照的重要信息。您理解本文檔中的信息這一點至關重要。請立即找人翻譯此文件。

Haitian Creole:

ENPÒTAN! Dokiman sa a genyen enfòmasyon enpòtan ladan li ki te ka afekte demann ou pou lisans oswa lisans ou. Li kritik ou konprann enfòmasyon ki nan dokiman sa a. Tanpri fè yon moun tradwi li imedyatman.

Portuguese:

IMPORTANTE! Este(s) documento(s) contém informações importantes que podem afetar seu requerimento de licença ou licença. É fundamental que você compreenda as informações contidas nele(s). Obtenha a tradução imediatamente.

CV Creole:

É IMPORTANT! Es dukumentu(s) ten informason importantis ki podi afeta bu pididu di lisensa ou lisensa. É fundamental ki bu kompriendi informason nes dukumentu. Pur favor, traduzi imidiatamenti.

Vietnamese:

QUAN TRỌNG! (Các) tài liệu này có chứa thông tin quan trọng có thể ảnh hưởng đến đơn xin cấp giấy phép hoặc giấy phép của quý vị. Điều quan trọng là quý vị phải hiểu thông tin có trong tài liệu này. Hãy dịch nó ngay lập tức.

Yoruba:



Ó Ẹ PÀTÀKÌ! Ìfitónilétí pàtàkì wà nínú (àwọn) ìwé yìí tí ó lè ní ipa lórí ibèèrè fún ìwé àṣẹ tàbí ìwé àṣẹ rẹ. Ó ẹ kókó kí ìfitónilétí inú ìwé yìí yé ọ. Jòwọ́ tùmò rẹ lójúkan nàà.

French:

"IMPORTANT ! Ce(s) document(s) contient des informations importantes qui pourraient avoir un impact sur votre demande de licence ou votre licence. Il est essentiel que vous compreniez les informations contenues dans ce document. Veuillez le faire traduire immédiatement."

Greek:

ΣΗΜΑΝΤΙΚΟ! Αυτό το έγγραφο περιέχει σημαντικές πληροφορίες που μπορεί να επηρεάσει την αίτηση έκδοσης άδειας ή την ίδια την άδεια. Είναι πολύ σημαντική η κατανόηση των πληροφοριών αυτού του εγγράφου. Παρακαλώ μεταφράστε το άμεσα!

Italian:

IMPORTANTE! Questo(i) documento(i) contiene informazioni importanti che potrebbero influenzare la tua richiesta di candidatura o licenza. È fondamentale che tu comprenda le informazioni contenute





**Elev8 Cannabis,
Inc.**

MR281810
Athol, MA 01331

Phone: 817-323-5586
E-mail:
seun@elev8cannabis.com

**Cannabis Control
Commission**

RE: Plan of Correction

c/o Timothy Barwise

Timothy.Barwise@cccmass.com

17 August 2022

To whom it concerns:

Please find the following plans to remedy the deficiencies listed in the statement received on August 12, 2022.

- **935 CMR 500.110**
 - To ensure the sufficient security of marijuana and marijuana products, Elev8 will require all staff to exit the premises no later than 1 hour after the closure of the retail establishment for the day. This action will be monitored by the timely setting of security system alarms and security logs will be kept on file for a period of 6 months.
- **935 CMR 500.170(1)**
 - Prevention of incidents such as the deficiency cited in the Deficiency Statement will be remedied by the plan described above. Moreover, any staff found in violation of this use of premises rule will be immediately dismissed from employment at Elev8 Cannabis, Inc.

We at Elev8 Cannabis, Inc. seek to get better each day, and are open to any additional plans of action suggested or required by the commission.

Kind Regards

Oluwaseun Adedeji



September 8, 2022

Elev8 Cannabis, Inc.
MR281810
Seun@elev8cannabis.com

Date of Inspection: September 6, 2022

NOTICE: DEFICIENCY STATEMENT

WHY ARE YOU RECEIVING THIS NOTICE?

The Marijuana Establishment / Marijuana Treatment Center was recently inspected. During the inspection, Commission staff identified deficiencies in the Marijuana Establishment / Marijuana Treatment Center that do not comply with applicable laws and regulations. The list of deficiencies are as follows:

Regulation:	Deficiency:
935 CMR 500.105(8)(d)	<p><i>(d) The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.</i></p> <p>Deficiency #1: At the September 6, 2022 inspection, Enforcement staff (“ES”) observed that an inventory conducted on September 4, 2022 did not include the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory.</p>
935 CMR 500.105(8)(b)	<p><i>(b) Real-time inventory shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d) including, at a minimum, an inventory of Marijuana plants; Marijuana plant-seeds and Clones in any phase of development such as Propagation, Vegetation, and Flowering; Marijuana ready for dispensing; all Marijuana Products; and all damaged, defective, expired, or contaminated Marijuana and Marijuana Products awaiting disposal.</i></p>



	<p>Deficiency #2: At the September 6, 2022 inspection, ES conducted a comprehensive inventory audit which included a review of negative package adjustments made by the licensee in Metrc. The retroactive negative adjustments demonstrate that real-time Marijuana inventory was not maintained as specified by the Commission.</p> <p>ES observed that on September 4, 2022, the licensee negatively adjusted the following packages with the “entry error” as the reason and “inventory audit” as the note:</p> <ol style="list-style-type: none"> 1) 1A40A0100000963000008525: M00001356703: Durban Poison 1/8th 2) 1A40A0100000963000008524: M00001371915: Sour Chillz 1/8th 3) 1A40A0100000963000008521: M00001356606: Banana M.A.C 1/8th 4) 1A40A0100000963000008522: M00001356713: Miracle Alien Cookies 1/8th 5) 1A40A0100000963000008529: M00001356608: Buttercream Cookies 1/8th 6) 1A40A0100002AFA000037562: M00001244219: 37791-SweetTalk-NanoGummy-CherryYuzu-FINP-MA 7) 1A40A0100002AFA000027300: M00001640211: 33919-TruFlowerPreRoll-1g-DrmScap-H-FINP-MA 8) 1A40A03000055F1000001658: M00001353730: PRJ-Crescendo 9) 1A40A0100002AFA000039417: M00001614123: 34639-TruFlowerPreRoll-1g-TigerBo-H-FINP-MA 10) 1A40A03000055F1000001653: M00001371966: PRJ-Squirt 11) 1A40A0100001AF6000048269: M00001467642: In House - Disposable Vape Cart - Thin Mint .5g 12) 1A40A03000046B5000000021: M00001252721: Northern Lights Blue .5g Pre-Roll 13) 1A40A03000046B5000000087: M00001640101: 34183-TruFlowerPreRoll-1g-HoneyGd-H-FINP-MA 14) 1A40A0300001771000015737: M00001534606: Cranberry Pomegranate Gummies (1:1:1) 100 MG 15) 1A40A0300004A9D000002537: M00001144520: Tincture - Purist Drops (30ml) 16) 1A40A0300001A91000012584: M00001198115: Lowell 0.59g Pre-Roll Single - The Chill Indica 17) 1A40A03000002BF000042486: M00001104435: AU: Forbidden Fruit Dried Pineapple Slices 100mg (20pk)
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	<p>18) 1A40A0100002AFA000025388: M00001272611: 31261-Bhang-ChocBar-100mg-CookieCream-FINP-MA</p> <p>19) 1A40A030000025A000063595: M00001413601: Wicked Go Sour Strawberry Gummies 5mg 20pk</p> <p>20) 1A40A0300004DBE000002538: M00001772907: Preroll - Green Meadows - Chem Fuego #2 - 1g</p> <p>21) 1A40A0300001F41000000558: M00001074757: Super Silver Haze - Shake/Trim – Bulk</p> <p>22) 1A40A03000002BF000041718: M00001206304: AU: Sweet Spot RSO Hybrid Hard Shell Chocolates Vibe 100mg (100pk)</p> <p>23) 1A40A0300003841000003826: M00001511909: Inspire by MONTEL - Calm 1g Vape Cartridge</p> <p>24) 1A40A03000044C1000016723: M00001314419: CUL - UX - Mini 5pk - Blend - Chocolate Soda</p> <p>25) 1A40A03000055F1000000433: M00001291809: PRJ – Unicorn</p> <p>26) 1A40A01000012C2000022902: M00001117007: M00001117007: 1906 Go Tin</p>
935 CMR 500.105(9)(b)	<p><i>(9) Recordkeeping. Records of a Marijuana Establishment shall be available for inspection by the Commission, on request. The financial records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:</i></p> <p><i>(b) Inventory Records as required by 935 CMR 500.105(8);</i></p>
935 CMR 500.105(8)(c)2.	<p><i>(c) A Marijuana Establishment shall:</i></p> <p><i>2. Conduct a monthly inventory of Marijuana in the process of cultivation and finished, stored Marijuana;</i></p>
935 CMR 500.105(8)(d)	<p><i>(d) The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.</i></p> <p>Deficiency #3: At the September 6, 2022 inspection, ES requested records of monthly inventories conducted in July 2022 and August 2022. The licensee was unable to make available records of monthly inventories for inspection. The licensee was unable to confirm that records of monthly inventories existed or if the inventories were conducted as required.</p>



	Notwithstanding the observed deficiency, a Metrc audit conducted by ES on September 6, 2022, indicated that licensee staff had conducted some form of inventory audits in August and July 2022 as evidenced by package adjustments made with the note “inventory count”.
935 CMR 500.105(12)(a)	<p><i>(12) Waste Disposal.</i> <i>(a) All recyclables and waste, including organic waste composed of or containing Finished Marijuana and Marijuana Products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on the Marijuana Establishment's Premises shall be locked and secured to prevent unauthorized access.</i></p> <p>Deficiency #4: At the September 6, 2022 inspection, ES observed that an exterior waste receptacle containing Marijuana waste was not locked to prevent unauthorized access.</p>
935 CMR 500.105(12)(c)3.	<p><i>3. Solid waste containing Marijuana generated at a Marijuana Establishment shall be ground up and mixed with other solid waste at the Marijuana Establishment such that the resulting mixture renders any Marijuana unusable for its original purpose. Once such Marijuana has been rendered unusable, the resulting solid waste may be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate agency in the jurisdiction in which the facility is located.</i></p> <p>Deficiency #5: At the September 6, 2022 inspection, ES observed that waste Marijuana disposed of in the exterior waste receptacle</p> <ol style="list-style-type: none"> 1) was grinded but not adequately mixed with other solid waste or; 2) was not sufficiently grinded to render it unusable.
935 CMR 500.110(9)(a)1.	<p><i>(9) Incident Reporting.</i> <i>(a) A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of any breach of security or other reportable incident defined in 935 CMR 500.110(9) immediately and, in no instance, more than 24 hours following discovery of the breach or incident. Notification shall occur, but not be limited to, during the following occasions:</i> <i>1. Discovery of inventory discrepancies;</i></p>



	<p>Deficiency #6: At the September 6, 2022 inspection, ES observed that inventory discrepancies discovered by the licensee during the September 4, 2022 inventory audit were not reported to the Commission within 24 hours.</p>
<p>935 CMR 500.110(9)(a)7.</p> <p>935 CMR 500.110(9)(b)</p>	<p><i>(9) Incident Reporting.</i></p> <p><i>(a) A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of any breach of security or other reportable incident defined in 935 CMR 500.110(9) immediately and, in no instance, more than 24 hours following discovery of the breach or incident. Notification shall occur, but not be limited to, during the following occasions:</i></p> <p><i>7. An alarm activation or other event that requires response by public safety personnel, including but not limited to local law enforcement, police and fire departments, public works or municipal sanitation departments, and municipal inspectional services departments, or security personnel privately engaged by the Marijuana Establishment;</i></p> <p><i>(b) A Marijuana Establishment shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate Law Enforcement Authorities were notified.</i></p> <p>Deficiency #7:</p> <ol style="list-style-type: none"> 1. At the September 6, 2022 inspection, ES learned that Athol Police responded to a false alarm activation on an unknown date in August 2022. The alarm activation and response by police that was not reported to the Commission with 24 hours. Additionally, the licensee did not provide the Commission with an incident report within 10 days following the alarm activation. 2. During a review of surveillance footage at the September 6, 2022 inspection, ES observed that Athol Police visited the premises on September 3, 2022 at approximately 9:43 AM and spoke with Chief Executive Officer Seun Adedeji in the parking lot. This police response incident was not reported to the Commission within 24 hours in accordance with the regulations.



WHAT ARE MY NEXT STEPS?

The Marijuana Establishment / Marijuana Treatment Center shall submit to the Commission a written plan of correction for any violations cited in this deficiency statement within ten (10) business days after receipt of this statement.

The plan of correction shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

The Commission shall review the plan of correction for compliance with all applicable laws and regulations and shall notify the Marijuana Establishment / Marijuana Treatment Center of either the acceptance or rejection of the plan.

Nothing contained herein or upon approval of a plan of correction shall be deemed a waiver of the Commission conducting further investigative activities or taking administrative action against the license issued to operate a Marijuana Establishment / Marijuana Treatment Center.

Please send your plan of correction to Timothy.Barwise@cccmass.com within ten (10) business days of the date of this notice.



IMPORTANT! This document(s) contains important information that could impact your license application or license. It is critical that you understand the information in this document. Please have it translated immediately.

Spanish:

¡ATENCIÓN! Este documento incluye información importante que podría afectar su licencia o solicitud de licencia. Es fundamental que entienda la información en este documento. Por favor, traducir de inmediato.

Traditional Chinese:

重要信息！ 本文檔包含可能影響您的執照申請或執照的重要信息。您理解本文檔中的信息這一點至關重要。請立即找人翻譯此文件。

Haitian Creole:

ENPÒTAN! Dokiman sa a genyen enfòmasyon enpòtan ladan li ki te ka afekte demann ou pou lisans oswa lisans ou. Li kritik ou konprann enfòmasyon ki nan dokiman sa a. Tanpri fè yon moun tradwi li imedyatman.

Portuguese:

IMPORTANTE! Este(s) documento(s) contém informações importantes que podem afetar seu requerimento de licença ou licença. É fundamental que você compreenda as informações contidas nele(s). Obtenha a tradução imediatamente.

CV Creole:

É IMPORTANT! Es dukumentu(s) ten informason importantis ki podi afeta bu pididu di lisensa ou lisensa. É fundamental ki bu kompriendi informason nes dukumentu. Pur favor, traduzi imidiatamenti.

Vietnamese:

QUAN TRỌNG! (Các) tài liệu này có chứa thông tin quan trọng có thể ảnh hưởng đến đơn xin cấp giấy phép hoặc giấy phép của quý vị. Điều quan trọng là quý vị phải hiểu thông tin có trong tài liệu này. Hãy dịch nó ngay lập tức.



Yoruba:

Ó Ẹ PÀTÀKÌ! Ifitónilétí pàtàkì wà nínú (àwọn) ìwé yìí tí ó lè ní ipa lórí ibéèrè fún ìwé àṣẹ tàbí ìwé àṣẹ rẹ. Ó ẹ kókó kí ifitónilétí inú ìwé yìí yé ọ. Jòwọ́ tùmò rẹ lójúkan nàà.

French:

"IMPORTANT ! Ce(s) document(s) contient des informations importantes qui pourraient avoir un impact sur votre demande de licence ou votre licence. Il est essentiel que vous compreniez les informations contenues dans ce document. Veuillez le faire traduire immédiatement."

Greek:

ΣΗΜΑΝΤΙΚΟ! Αυτό το έγγραφο περιέχει σημαντικές πληροφορίες που μπορεί να επηρεάσει την αίτηση έκδοσης άδειας ή την ίδια την άδεια. Είναι πολύ σημαντική η κατανόηση των πληροφοριών αυτού του εγγράφου. Παρακαλώ μεταφράστε το άμεσα!

Italian:

IMPORTANTE! Questo(i) documento(i) contiene informazioni importanti che potrebbero influenzare la tua richiesta di candidatura o licenza. È fondamentale che tu comprenda le informazioni contenute



September 21, 2022

Elev8 Cannabis, Inc.

MR281810

seun@elev8cannabis.com

Attn: Cannabis Control Commission
 Attn: Timothy Barwise
 2 Washington Square
 Worcester, MA 01604

RESPONSE TO NOD: CORRECTIVE ACTIONS TO DEFICIENCIES

The following are corrective action steps by the Marijuana Establishment / Marijuana Treatment Center located at 243 Main Street, Athol, MA 01331 shall be taking or putting in place to address corresponding deficiencies identified as a result of the inspection conducted on September 6, 2022.

Regulation:	Deficiency / Corrective Action Step
935 CMR 500.105(8)(d)	<p><i>(d) The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.</i></p> <p>Deficiency #1: At the September 6, 2022 inspection, Enforcement staff (“ES”) observed that an inventory conducted on September 4, 2022 did not include the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory.</p> <p>Corrective Action Steps #1:</p> <ol style="list-style-type: none"> 1. We shall ensure that the individual who conducted the inventory on September 4th, 2022 gets retrained before performing any inventory 2. We shall retrain the individual who conducted the inventory on September 4th, 2022 on proper inventory logging or recording by September 30th, 2022
935 CMR 500.105(8)(b)	<p><i>(b) Real-time inventory shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d) including, at a minimum, an inventory of Marijuana plants; Marijuana plant-seeds and Clones in any phase of development such as Propagation, Vegetation, and Flowering; Marijuana ready for dispensing; all Marijuana Products; and all damaged, defective, expired,</i></p>

or contaminated Marijuana and Marijuana Products awaiting disposal.

Deficiency #2: At the September 6, 2022 inspection, ES conducted a comprehensive inventory audit which included a review of negative package adjustments made by the licensee in Metrc. The retroactive negative adjustments demonstrate that real-time Marijuana inventory was not maintained as specified by the Commission.

ES observed that on September 4, 2022, the licensee negatively adjusted the following packages with the “entry error” as the reason and “inventory audit” as the note:

- 1) 1A40A0100000963000008525: M00001356703: Durban Poison 1/8th
- 2) 1A40A0100000963000008524: M00001371915: Sour Chillz 1/8th
- 3) 1A40A0100000963000008521: M00001356606: Banana M.A.C 1/8th
- 4) 1A40A0100000963000008522: M00001356713: Miracle Alien Cookies 1/8th
- 5) 1A40A0100000963000008529: M00001356608: Buttercream Cookies 1/8th
- 6) 1A40A0100002AFA000037562: M00001244219: 37791-SweetTalk-NanoGummy-CherryYuzu-FINP-MA
- 7) 1A40A0100002AFA000027300: M00001640211: 33919-TruFlowerPreRoll-1g-DrmScap-H-FINP-MA
- 8) 1A40A03000055F1000001658: M00001353730: PRJ-Crescendo
- 9) 1A40A0100002AFA000039417: M00001614123: 34639-TruFlowerPreRoll-1g-TigerBo-H-FINP-MA
- 10) 1A40A03000055F1000001653: M00001371966: PRJ-Squirt
- 11) 1A40A0100001AF6000048269: M00001467642: In House - Disposable Vape Cart - Thin Mint .5g
- 12) 1A40A03000046B5000000021: M00001252721: Northern Lights Blue .5g Pre-Roll
- 13) 1A40A03000046B5000000087: M00001640101: 34183-TruFlowerPreRoll-1g-HoneyGd-H-FINP-MA
- 14) 1A40A0300001771000015737: M00001534606: Cranberry Pomegranate Gummies (1:1:1) 100 MG
- 15) 1A40A0300004A9D000002537: M00001144520: Tincture - Purist Drops (30ml)
- 16) 1A40A0300001A91000012584: M00001198115: Lowell 0.59g Pre-Roll Single - The Chill Indica
- 17) 1A40A03000002BF000042486: M00001104435: AU: Forbidden Fruit Dried Pineapple Slices 100mg (20pk)
- 18) 1A40A0100002AFA000025388: M00001272611: 31261-Bhang-ChocBar-100mg-CookieCream-FINP-MA
- 19) 1A40A030000025A000063595: M00001413601: Wicked Go Sour Strawberry Gummies 5mg 20pk

20) 1A40A0300004DBE000002538: M00001772907:
Preroll - Green Meadows - Chem Fuego #2 - 1g
21) 1A40A0300001F41000000558: M00001074757:
Super Silver Haze - Shake/Trim – Bulk
22) 1A40A03000002BF000041718: M00001206304: AU:
Sweet Spot RSO Hybrid Hard Shell Chocolates Vibe
100mg (100pk)
23) 1A40A0300003841000003826: M00001511909:
Inspire by MONTEL - Calm 1g Vape Cartridge
24) 1A40A03000044C1000016723: M00001314419:
CUL - UX - Mini 5pk - Blend - Chocolate Soda
25) 1A40A03000055F1000000433: M00001291809: PRJ
– Unicorn
26) 1A40A01000012C2000022902:
Corrective Action Steps #2:

1. We shall ensure that the individual who conducted the inventory on September 4th, 2022 gets retrained before performing any inventory,
2. Product destruction SOP will be reviewed regularly to ensure it is being followed
3. We shall retrain the individual who conducted the inventory on September 4th, 2022 on proper inventory logging or recording by September 30th, 2022

935 CMR 500.105(9)(b)

(9) Recordkeeping. Records of a Marijuana Establishment shall be available for inspection by the Commission, on request. The financial records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

(b) Inventory Records as required by 935 CMR 500.105(8);

935 CMR 500.105(8)(c)2.

(c) A Marijuana Establishment shall:

2. Conduct a monthly inventory of Marijuana in the process of cultivation and finished, stored Marijuana;

935 CMR 500.105(8)(d)

(d) The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

	<p>Deficiency #3: At the September 6, 2022 inspection, ES requested records of monthly inventories conducted in July 2022 and August 2022. The licensee was unable to make available records of monthly inventories for inspection. The licensee was unable to confirm that records of monthly inventories existed or if the inventories were conducted as required.</p> <p>Notwithstanding the observed deficiency, a Metrc audit conducted by ES on September 6, 2022, indicated that licensee staff had conducted some form of inventory audits in August and July 2022 as evidenced by package adjustments made with the note "inventory count".</p> <p>Corrective Action Steps #3:</p> <ol style="list-style-type: none"> 1. All Individual responsible for conducting inventory were trained in the proper recordkeeping. 2. We have taken disciplinary actions and or warnings have been issued against all responsible parties. 3. We will retrain all team members (<i>current and new</i>) to ensure they follow and adhere required SOP 4. New General Manager has been added to the team. 5. Conducting 8+ hour dedicated training for the new general manager 6. We will implement internal audits to be conducted regularly to make sure SOP are being followed
935 CMR 500.105(12)(a)	<p>(12) Waste Disposal.</p> <p>(a) All recyclables and waste, including organic waste composed of or containing Finished Marijuana and Marijuana Products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on the Marijuana Establishment's Premises shall be locked and secured to prevent unauthorized access.</p>

Notification shall occur, but not be limited to, during the following occasions:

1. Discovery of inventory discrepancies;

Deficiency #6: At the September 6, 2022 inspection, ES observed that inventory discrepancies discovered by the licensee during the September 4, 2022 inventory audit were not reported to the Commission within 24 hours.

Corrective Action Steps #6:

1. We will train all leaders (supervisors and up) to report all inventory discrepancies
2. We will inform investigator of any and all inventory discrepancy within 24 hours

Incident Report #6:

I was not aware of this incident prior to the incident, upon investigation does that were aware were have since left the company.

935 CMR 500.110(9)(a)7.

(9) Incident Reporting.

(a) A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of any breach of security or other reportable incident defined in 935 CMR 500.110(9) immediately and, in no instance, more than 24 hours following discovery of the breach or incident. Notification shall occur, but not be limited to, during the following occasions:

7. An alarm activation or other event that requires response by public safety personnel, including but

935 CMR 500.110(9)(b)

not limited to local law enforcement, police and fire departments, public works or municipal sanitation departments, and municipal inspectional services departments, or security personnel privately engaged by the Marijuana Establishment;

(b) A Marijuana Establishment shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate Law Enforcement Authorities were notified.

Deficiency #7:

1. At the September 6, 2022 inspection, ES learned that Athol Police responded to a false alarm activation on an unknown date in August 2022. The alarm activation and response by police that was not reported to the Commission with 24 hours. Additionally, the licensee did not provide the Commission with an incident report within 10 days following the alarm activation.
2. During a review of surveillance footage at the September 6, 2022 inspection, ES observed that Athol Police visited the premises on September 3, 2022 at approximately 9:43 AM and spoke with Chief Executive Officer Seun Adedeji in the parking lot. This police response incident was not reported to the Commission within 24 hours in accordance with the regulations.

Corrective Actions / Steps #7:

1. We will assign the responsibility of reporting to the commission to the managers at each establishment
2. We will train each managers on how to submit incident report in the manner determined by the commission to be acceptable

- | | |
|--|---|
| | <p>3. We will ensure all changes to alarm codes are properly communicated to all parties with the need-to-know</p> <p>Incident Report #7:</p> <p>Alarm codes were updated. Used previous code severally which triggered the Alarm.</p> |
|--|---|

Sincerely,

Seun Adedeji, President
Elevate Cannabis



September 30, 2022

Elev8 Cannabis, Inc.
 MR281810
Seun@elev8cannabis.com

Date of Inspection: September 6, 2022

NOTICE: DEFICIENCY STATEMENT

WHY ARE YOU RECEIVING THIS NOTICE?

The Marijuana Establishment / Marijuana Treatment Center was recently inspected. During the inspection, Commission staff identified deficiencies in the Marijuana Establishment / Marijuana Treatment Center that do not comply with applicable laws and regulations. The list of deficiencies are as follows:

Regulation:	Deficiency:
935 CMR 500.110(9)(a)7.	(9) Incident Reporting. (a) A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of any breach of security or other reportable incident defined in 935 CMR 500.110(9) immediately and, in no instance, more than 24 hours following discovery of the breach or incident. Notification shall occur, but not be limited to, during the following occasions: 7. An alarm activation or other event that requires response by public safety personnel, including but not limited to local law enforcement, police and fire departments, public works or municipal sanitation departments, and municipal inspectional services departments, or security personnel privately engaged by the Marijuana Establishment;
935 CMR 500.110(9)(b)	(b) A Marijuana Establishment shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and



	<p><i>confirmation that the appropriate Law Enforcement Authorities were notified.</i></p> <p>Deficiency #1: During a review of surveillance footage at the September 6, 2022 inspection, ES discovered that Athol Police visited the premises on September 3, 2022 at approximately 9:43 AM and spoke with Chief Executive Officer Seun Adedeji in the parking lot.</p> <p>The Licensee did not submit an incident report to the Commission within ten (10) calendar days following the September 3, 2022 incident.</p>
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WHAT ARE MY NEXT STEPS?

The Marijuana Establishment / Marijuana Treatment Center shall submit to the Commission a written plan of correction for any violations cited in this deficiency statement within ten (10) business days after receipt of this statement.

The plan of correction shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

The Commission shall review the plan of correction for compliance with all applicable laws and regulations and shall notify the Marijuana Establishment / Marijuana Treatment Center of either the acceptance or rejection of the plan.

Nothing contained herein or upon approval of a plan of correction shall be deemed a waiver of the Commission conducting further investigative activities or taking administrative action against the license issued to operate a Marijuana Establishment / Marijuana Treatment Center.

Please send your plan of correction to Timothy.Barwise@cccmass.com within ten (10) business days of the date of this notice.



IMPORTANT! This document(s) contains important information that could impact your license application or license. It is critical that you understand the information in this document. Please have it translated immediately.

Spanish:

¡ATENCIÓN! Este documento incluye información importante que podría afectar su licencia o solicitud de licencia. Es fundamental que entienda la información en este documento. Por favor, traducir de inmediato.

Traditional Chinese:

重要信息！ 本文檔包含可能影響您的執照申請或執照的重要信息。您理解本文檔中的信息這一點至關重要。請立即找人翻譯此文件。

Haitian Creole:

ENPÒTAN! Dokiman sa a genyen enfòmasyon enpòtan ladan li ki te ka afekte demann ou pou lisans oswa lisans ou. Li kritik ou konprann enfòmasyon ki nan dokiman sa a. Tanpri fè yon moun tradwi li imedyatman.

Portuguese:

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É IMPORTANT! Es dukumentu(s) ten informason importantis ki podi afeta bu pididu di lisensa ou lisensa. É fundamental ki bu kompriendi informason nes dukumentu. Pur favor, traduzi imidiatamenti.

Vietnamese:

QUAN TRỌNG! (Các) tài liệu này có chứa thông tin quan trọng có thể ảnh hưởng đến đơn xin cấp giấy phép hoặc giấy phép của quý vị. Điều quan trọng là quý vị phải hiểu thông tin có trong tài liệu này. Hãy dịch nó ngay lập tức.

Yoruba:



Ó Ẹ PÀTÀKÌ! Ìfitónilétí pàtàkì wà nínú (àwọn) ìwé yìí tí ó lè ní ipa lórí ibéèrè fún ìwé àṣẹ tàbí ìwé àṣẹ rẹ. Ó ẹ kókó kí ìfitónilétí inú ìwé yìí yé ọ. Jòwọ́ tùmò rẹ lójúkan nàà.

French:

"IMPORTANT ! Ce(s) document(s) contient des informations importantes qui pourraient avoir un impact sur votre demande de licence ou votre licence. Il est essentiel que vous compreniez les informations contenues dans ce document. Veuillez le faire traduire immédiatement."

Greek:

ΣΗΜΑΝΤΙΚΟ! Αυτό το έγγραφο περιέχει σημαντικές πληροφορίες που μπορεί να επηρεάσει την αίτηση έκδοσης άδειας ή την ίδια την άδεια. Είναι πολύ σημαντική η κατανόηση των πληροφοριών αυτού του εγγράφου. Παρακαλώ μεταφράστε το άμεσα!

Italian:

IMPORTANTE! Questo(i) documento(i) contiene informazioni importanti che potrebbero influenzare la tua richiesta di candidatura o licenza. È fondamentale che tu comprenda le informazioni contenute





Elev8 Athol team members were not following our return policy. Smoked products or fully smoked products were being exchanged when our guests came in to complain about the quality of products or pre roll wasn't pulling.

1. Elev8 Cannabis, Inc. ("Elev8") appreciates the Commission bringing this deficiency to its attention and giving it an opportunity to correct the deficiency.
2. Elev8's CEO Seun Adedeji has reviewed and understands the notice and applicable rules.
3. Attached is a memorandum to facility staff explaining the steps they should take to ensure compliance with 935 CMR 500.110(9)(a)7 and (9)(b).
4. Attached is the incident report form to be used to report incidents governed by 935 CMR 500.110(9)(a).
5. The memorandum and incident report form will be provided to all staff at the facility. All staff will be asked to sign a copy of the memorandum stating they have reviewed it. The signed copies will be kept onsite.
6. Elev8 thanks the Commission for its consideration of this corrective action plan and requests its approval or input regarding the plan.

Elev8 has new staff and will be re-training on Return policy.

- 1) Educate our staff on return policy
- 2) 80 plus min worth of training
- 3) No return on smoked items while being sympathetic to our guest situation.
- 4) Cartridges with defective hard drives will be tested to make sure it is not a user error and not a defect on the battery or cartridge itself, Elev8 staff will follow Elev8 return protocol and inform vendors of any defects. This will ensure that Elev8 can get a deeper view and understanding on the products and receive the proper credit on our next purchase.

Seun ADEDEJI

President and CEO

Elev8

09/03/2022 - Saturday

Police was called to Elev8 and requested to see Seun Adedeji's (CEO) ID. CEO provided the police officers with his ID. Police officers asked who owned the property and CEO informed them that he is the owner.



10/03/2022 - Monday

Joe Queen consistently undermined processes and procedures while ignoring ownership directives.

Joe was not following inventory processes which then made the job longer and harder. CEO and Joe had completed inventory count a day prior. Joe on his own, decided to mix all pre rolls into one bucket, after CEO already separated them by metric tags, CEO informed Joe of this. Joe became unhappy with this conversation and started getting aggressive with CEO. Joe was saying "I'm going to get you shut down", "you are done, your business." Joe made numerous threats to get Elev8 shut down and to ruin the business. Joe is no longer with Elev8. Police were called and police showed up onsite at Elev8.



11/9/2022

Elev8 power went off, National Grid turned the power off. Generator kicked in, and was running for a day plus. The same day, the generator went out of gas, and National Grid turned power back on. Because the power was off, the electronic doors were not working. The local locksmith was contacted to make repairs to the electric door after power went out. Elev8 staff were then able to get into the building and turn circuit off and the main breakers on. Power started working again. We notified our CCC investigator right away of this incident.

11/18/2022

At approximately 2:00pm at Elev8 Cannabis, the security alarm went off which alerted the local police. CEO Seun Adededji and Operations Manager Kira Rogers were on site at the location and opened the location. The police arrived on site and spoke with Adedji about the alarm going off and ensured it was not a burglary or security breach. The police officer then left the location and Adedeji called American Alarm to set the alarm and close the Elev8 store location. Adededji found out that the panic button was tripped and reset the buttons, then secured the location and set the alarm.

COMMONWEALTH OF MASSACHUSETTS

WORCESTER COUNTY

CANNABIS CONTROL COMMISSION

IN THE MATTER OF

Elev8 Cannabis Inc.

MR281810 - Suspended

MR282630 - Suspended

MR281383 - Suspended

Administrative Hearing

Docket No.

Enforcement Case No. 2022-1336

ENFORCEMENT EXHIBIT 7

On January 11, 2023, seventeen packages of Marijuana were identified as having discrepancies between the inventory in Respondent's Metrc and the Marijuana physically present at the Athol store.

Eleven packages of Marijuana were physically unaccounted for at the Athol store:

- | | |
|-----------------------------|------------------------------|
| 1. 1A40A0300004DBE000002286 | 7. 1A40A01000008FD000013214 |
| 2. 1A40A0100006BD4000005253 | 8. 1A40A01000012C2000032440 |
| 3. 1A40A0300004A9D000002834 | 9. 1A40A01000012C2000025844 |
| 4. 1A40A030000025A000063595 | 10. 1A40A01000012C2000025846 |
| 5. 1A40A0100001AF5000019242 | 11. 1A40A01000012C2000022902 |
| 6. 1A40A0300004E21000005269 | |

One package had less physical quantity of Marijuana at the Athol store than reported in Metrc:

12. 1A40A0100000963000008520

Five packages of Marijuana reported negative amounts in Metrc, meaning that Marijuana continued to be sold from the package and its associated Metrc record after the virtual record indicated that there should be no Marijuana physically left in the package:

13. 1A40A0100000A2E000069422
14. 1A40A01000029CD000008136
15. 1A40A0300004DBE000002538
16. 1A40A0300003779000015188
17. 1A40A0300001771000015737





February 17, 2023

Sent via Electronic Mail to PFeldman@davismalm.com

Paul L. Feldman
Davis, Malm, and D'Agostine, P.C.
One Boston Place, 37th Floor
Boston, Massachusetts 02108

Counsel for:
Elev8 Cannabis Inc.
243 Main Street
Athol, Massachusetts 01331
seun@elev8cannabs.com

RE: Elev8 Cannabis Inc.
License No. MR281810
ENF-2022-0000001336

NOTICE OF INTENT TO LIMIT SALES OF MARIJUANA AND MARIJUANA
PRODUCTS
935 CMR 500.330(2)

Dear Attorney Feldman,

Pursuant to 935 CMR 500.330(2), the Cannabis Control Commission ("Commission") finds that Elev8 Cannabis, Inc. ("Elev8"), an adult-use Marijuana Retailer located at 243 Main Street, Athol, Massachusetts 01331, does not substantially comply with the regulatory provisions cited below. Accordingly, the Commission is considering issuing an order that would prohibit Elev8 from selling Marijuana or Marijuana Products, also known as a Limitation of Sales Order.

Before issuing a Limitation of Sales Order, the Commission must give Elev8 a reasonable opportunity to correct the deficiencies causing substantial noncompliance.

Therefore, Elev8 will have 21 calendar days from the date of this notice to take the ten corrective action measures identified below. Meaning, that if these corrective measures are not taken by **March 9, 2023**, then the Commission may issue a Limitation of Sales Order against Elev8 until the substantial noncompliance has been resolved.

FINDINGS OF SUBSTANTIAL NONCOMPLIANCE:

REGULATORY CITE NO. 1 – 935 CMR 500.105(2)(a): *A Marijuana Establishment shall ensure that all Agents complete minimum training requirements prior to performing job*



functions which includes a total of eight hours of annual training consisting of four hours of training from a Responsible Vendor Training (RVT) Program, basic on-the-job training, and Metrc training. Records of compliance with all training requirements shall be maintained for four years and be available for inspection on request.

1. On January 11, 2023, during a review of personnel records, Enforcement staff observed that Elev8 did not have personnel or training records for either Ms. Gordon or Mr. Francois despite them having been registered as Agents and started working on December 5, 2022 and November 28, 2022, respectively. Accordingly, Elev8 did not have any record that Ms. Gordon or Mr. Francois completed the minimum training requirements before they began performing job functions. **Elev8 must submit verification of any and all training programs that Ms. Gordon and Mr. Francois have completed to date, as employees of Elev8. If Ms. Gordon and Mr. Francois have not satisfied the minimum training requirements in 935 CMR 500.105(2)(a), then Elev8 must ensure that Ms. Gordon and Mr. Francois complete the required trainings and must provide verification of completion of Responsible Vendor Training, basic on-the-job training, and Metrc training;**

REGULATORY CITE NO. 2 – 935 CMR 500.105(8)(b) & (f): *A Marijuana Establishment shall maintain a real-time inventory of the Marijuana and Marijuana Products at its facility. The failure to enter inventory into Metrc may result in the suspension or revocation of a Marijuana Establishment License.*

2. On January 11, 2023, Enforcement staff conducted a Metrc audit utilizing a Radio Frequency Identification reader and observed seventeen discrepancies between the inventory Elev8 input into Metrc and the physical inventory at its facility. Eleven packages that were input into Metrc could not be physically located, one physical package had a lower quantity of Marijuana than the corresponding quantity reported in Metrc, and five packages had negative amounts of Marijuana Products as reported in Metrc (*i.e.*, Metrc indicated that the amount of physical product at Elev8's facility had already been fully depleted by reaching and surpassing zero quantity). Accordingly, Elev8 did not have a real-time inventory of the Marijuana or Marijuana Products at its facility. **Elev8 must provide the Commission with a written explanation for each individual discrepancy discovered at the January 11, 2023 inspection concerning the following Metrc tag nos.:**
 - a. 1A40A0300004DBE000002286
 - b. 1A40A0300004A9D000002834
 - c. 1A40A030000025A000063595
 - d. 1A40A0100001AF5000019242
 - e. 1A40A0300004E21000005269
 - f. 1A40A01000012C2000032440
 - g. 1A40A01000012C2000025844
 - h. 1A40A01000012C2000025846
 - i. 1A40A01000012C2000022902
 - j. 1A40A0100000963000008520
 - k. 1A40A0100000A2E000069422
 - l. 1A40A01000029CD000008136
 - m. 1A40A0300004DBE000002538
 - n. 1A40A0300003779000015188
 - o. 1A40A0300001771000015737

REGULATORY CITE NO. 3 – 935 CMR 500.105(8)(c)-(d): *A Marijuana Establishment shall conduct a monthly inventory of Marijuana. The inventory shall include, at a minimum, the date*



of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

3. In November 2022 and January 2023, Elev8 conducted an audit of its inventory but did not include the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory. Further, there is no evidence of a monthly inventory audit conducted in December 2022. **Elev8 must provide the Commission with a complete and compliant record of the inventory audits conducted for the months of November 2022, December 2022, and January 2023 that contains the required information.**

REGULATORY CITE NO. 4 – 935 CMR 500.105(8)(g): *Any distribution of Marijuana or Marijuana Products shall be tracked in the Commission’s designated Seed-to-sale System of Record (herein, “Metrc”).*

4. Between June 8, 2022 and January 11, 2023, approximately 9,908 sales transactions at Elev8 were recorded under a manager or owner’s name and not the registered Marijuana Establishment Agent (“Agent”) who conducted the transaction. **Elev8 must reconcile its Point-of-sale records with Metrc to accurately reflect the Agents who conducted sales.**

REGULATORY CITE NO. 5 – 935 CMR 500.105(12)(a): *All exterior waste receptacles located on the Marijuana Establishment’s Premises shall be locked and secured to prevent unauthorized access.*

5. On January 11, 2023, Enforcement staff observed that Elev8’s exterior dumpster was not locked to prevent unauthorized access after receiving a Notice of Deficiency on September 8, 2022 for the same violation. **Elev8 must demonstrate that its exterior dumpster is locked and is able to prevent unauthorized access.**

REGULATORY CITE NO. 6 – 935 CMR 500.110(5)(f): *All security equipment shall be in good working order and shall be inspected and tested at regular intervals, not to exceed 30 calendar days from the previous inspection and test.*

6. On January 11, 2023, Enforcement staff observed that one of Elev8’s vault cameras was inoperable and Elev8 was unable to produce any video records during the time period of December 16, 2022–January 11, 2023 for the inoperable camera. **Elev8 must provide verification that the inoperable camera in its vault is currently operating and is able to produce video records for inspection.**

REGULATORY CITE NO. 7 – 935 CMR 500.110(9)(a)1. & (9)(b): *A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of the discovery of inventory discrepancies within 24 hours of the incident and submit an incident report detailing the circumstances of the event, any corrective action taken, and confirmation that Law Enforcement Authorities were notified, within ten business days of discovery.*



7. On December 10 and 16, 2022, and January 7, 2023, Elev8 negatively adjusted packages (i.e., manually adjusted the reported quantity of Marijuana a package has in Metrc, outside of a sales transaction) with Metrc tag no. 1A40A01000029CD000014076 by two 1-gram pre-rolls, 1A40A0300004A9D000002620 by four 30-milliliter tinctures, and 1A40A0100000A2E000069424 by two 1-gram pre-rolls. In Elev8's Metrc package adjustment records, Elev8 described the negative adjustments as an "entry error" and noted that the reason for adjustment was an "inventory audit" and in three instances "API errors." Elev8 did not notify the Commission of any of these inventory discrepancies within 24 hours nor submit an incident report within ten days. **Elev8 must formally notify the Commission of these inventory discrepancies by submitting incident reports for the three Metrc packages identified above.**

REGULATORY CITE NO. 8 – 935 CMR 500.110(9)(a)7. & (9)(b): *A Marijuana Establishment shall notify the Commission of events that requires response by local law enforcement within 24 hours of the incident and submit an incident report which details the circumstances of the event, and any corrective action taken, and confirmation that Law Enforcement Authorities were notified, within ten calendar days.*

8. On August 14, August 23, September 3, October 2, and October 3, 2022, the Athol police department responded to 911 calls and alarms at Elev8's facility. Elev8 did not notify the Commission of any of these incidents within 24 hours. Elev8 also did not submit incident reports for these events within ten calendar days. On November 21, 2022, Elev8 submitted untimely incident reports for Athol police department responses on September 3 and October 3, 2022. Elev8 never notified the Commission of Athol police department responses made on August 14, August 23, and October 2. **Elev8 must formally notify the Commission of the August 14, August 23, and October 2 incidents by submitting incident reports for those events.**

REGULATORY CITE NO. 9 – 935 CMR 500.160(5): *Marijuana or Marijuana Products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, Transferred or otherwise conveyed until retested.*

9. On January 11, 2023, during a Metrc audit of Elev8's sales records, Enforcement staff observed that Elev8 sold three Marijuana Products – Metrc packages 1A40A0300001A91000012585, 1A40A0100002AFA000008580, and 1A40A0300004E21000005838 – with expired test results. **Elev8 must recall the three expired Marijuana Products sold to customers and provide verification of the consumer recall to the Commission.**

REGULATORY CITE NO. 10 – 935 CMR 500.320(4): *An unacceptable Plan of Correction shall be amended and resubmitted within five business days after receipt of such notice.*

10. On September 8 and 30, 2022, Enforcement staff issued Notices of Deficiency (NOD) to Elev8. On September 21, 2022, Elev8 submitted a Plan of Correction (POC) in response to the September 8, 2022 NOD. On September 27, 2022, Enforcement staff notified Elev8 that components of its plan are rejected. Elev8 did not submit an amended POC



within five business days of Enforcement staff's rejection of the POC. **Elev8 must submit an acceptable amended POC for the September 8 and 30, 2022 NOD.**

Elev8 must take the corrective actions identified above within 21 calendar days of the date of this notice – on or before **March 9, 2023**. Failure to restore compliance by **March 9, 2023** may result in the issuance of a Limitation of Sales Order, which would prohibit Elev8 from selling Marijuana or Marijuana Products until its substantial noncompliance has been addressed. Verification of compliance must be provided to Associate Enforcement Counsel Jacob Nielson at Jacob.Nielson@CCCmass.com and Investigations Manager Timothy Barwise at Timothy.Barwise@CCCmass.com.

The Commission reserves the right to take further enforcement action against Elev8 pursuant to any of the remedies available under 935 CMR 500.450 and this Notice does not preclude the Commission from taking actions necessary to protect the public health, safety, and welfare pursuant to its statutory and regulatory obligations.

Sincerely,



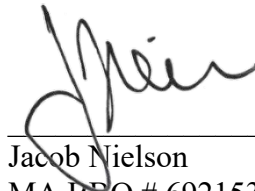
Yaw Gyebi, Jr., Esq.
Chief of Investigations and Enforcement
Cannabis Control Commission

cc: Shawn Collins, Executive Director
Nomxolisi Khumalo, Director of Investigations
Kyle Potvin, Director of Licensing
Rebecca Lopez, Enforcement Counsel
Jacob Nielson, Associate Enforcement Counsel
Timothy Barwise, Investigations Manager



CERTIFICATE OF SERVICE

I, Jacob Nielson, hereby certify that on this 17th day of February 2023, I served a copy of this Notice of Substantial Noncompliance on Elev8 Cannabis, Inc. by electronic mail to the owner of record of Elev8 Cannabis, Inc., Oluwaseun Adedeji at seun@elev8cannabis.com and their attorney, Paul L. Feldman, Esq. at pfeldman@davismalm.com.



Jacob Nielson
MA BBO # 692153
Jacob.nielson@cccmass.com
Union Station
2 Washington Square
Worcester, Massachusetts 01609
774-670-4091





To Whom It May Concern

Above all, we hope our commitment and efforts to work with and towards compliance is seen, heard and acknowledged. While we are accountable for the past, it cannot all be changed, yet we hope the differences already made are enough to assure the CCC of our commitment to a more solid and compliant foundation moving forward. We submit the following towards being Compliant with the CCC towards a mutual amicable solution that sales might continue where Elev8 Cannabis Inc is concerned.

1. On January 11, 2023, during a review of personnel records, Enforcement staff observed that Elev8 did not have personnel or training records for either Ms. Gordon or Mr. Francois despite them having been registered as Agents and started working on December 5, 2022 and November 28, 2022, respectively. Accordingly, Elev8 did not have any record that Ms. Gordon or Mr. Francois completed the minimum training requirements before they began performing job functions. Elev8 must submit verification of any and all training programs that Ms. Gordon and Mr. Francois have completed to date, as employees of Elev8. If Ms. Gordon and Mr. Francois have not satisfied the minimum training requirements in 935 CMR 500.105(2)(a), then Elev8 must ensure that Ms. Gordon and Mr. Francois complete the required trainings and must provide verification of completion of Responsible Vendor Training, basic on-the-job training, and Metrc training;

We acknowledge the efforts to help us stay compliant by first ensuring employees and employers understand the gravity of the training and learning expected. Below are training documents for Jerry Francois and Zjontaye Gordon. There are several metrc and dutchie tickets showcasing several efforts to better understand these programs. However as of February 16th Jerry Francois and Zjontaye Gordon were put on paid leave and they have chosen not to proceed with Elev8 Cannabis moving forward. We are committed to a foundation committed to compliance, starting with employees.





**Below are real time store inventory conducted for February. See spreadsheet templates below created towards daily inventory notes, weekly full inventory to better track adjustments, and real time inventory tracking/updates for what is in the store.
(Note: Item number has been replaced with metric tag number moving forward)**

Item Number	PREROLLS
M00001974520	Strawberry Guava 1g
M00001975903	Garlic Drip 1g
M00002108025	Standared Farms Mf Pie 0.5g
M00002086120	g13 Hashplant X Northen Lights 0.5g
M00002212939	Grandpa's Stash 0.5g
M00002101610	SF Skunk Hero X Ethos Cookies #16 0.5g
M00002206255	L.A Kush Cake (0.5g)
M00002118138	Toast Classic Skunk Heros x Ethos Cookies #16 (0.5g)
M00002118138	Toast Classic Skunk Heros x Ethos Cookies #16 (0.5g)
M00001981931	Toast Classic Flight Plan X Stuffed French Toast #13 (0.5g)
M00002101741	Toast Classic Mf Pie (0.5g)
M00001981811	Toast Classic Gary Payton X Pirates Milk (0.5g)
M00001796923	Toast Classic Sour Diesel X Animal Cookies (0.5g)
M00001915993	Vince Wilfunk Fatso x Gushers (0.5g)



M00002126642	Roger Clemintz (0.5g)
M00001640101	Honey Gold 1g
M00001665833	Apple Kugel 1g
M00000242542	Cease and Desist 1g

Item Number	FLOWERS
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00001697723	Orange Harambe (3.5g)
M00002058909	Sour Kosher x Tropicanna Cookies
M00001716819	Hammock Daddy
M00001808556	Pungent Smile
M00001747655	Raspberry Rays
M00001094223	Root Beer
M00001614122	Tiger Bomb
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00002038140	G13 Hashplant x Northern Lights (3.5g)
M00001697723	Orange Harambe (3.5g)
M00002058909	Sour Kosher x Tropicanna Cookies
M00001716819	Hammock Daddy

Item Numbers	CONCENTRATES
M00002072089	Pvx Cured Purple Valley Grapes Sugar 0.5g



M00002072088	PVX Cured Wedding Pie Sugar
M00001977714	PVX Cured Half Pint Sugar
M00001977713	PVX Cured Dosido Sugar
M00002072087	PVX Cured Sugar
M00001511909	Calm Concentrate
M00001482628	Orange Harambe Concentrate
M00001511909	Chocolate Marshmallow
M00001952205	Mandarin ZkittleZ
M00001680728	Double Chocolate Bubble Hash
M0000718509	Serenity
M00002102916	Mixed Greens Dead Head OG
M00001144520	Tincture Purist Drops

Item Number	Vape Products
M000002148707	Standard Farms Cold Press
M00002148605	Standard Farms Jilly Bean
M00002140112	Airo Pod LA Kush Cake
M00001806806	Airo Pod Citrus Splash
M00001477070	Airo Rod Bluedream
M00001410567	Airo Pod Black Mamba
M00001467642	Disp In House Vape Cart Thin Mint
M00001401241	Disp In House Vape Cart Gelato
M00002057302	Disp In House Vape Cart Headlock
M00001569415	Disp In House Vape Cart Citrus Cooler
M00002090616	Disp In House Vape Cart Blue Dream
M00001580741	Ration R&R cart
M00001580740	Ration Support Cart
M00001580739	Ration Active Cart
M00002015829	Creamsicle
M00000849009	Mango Super Silver Haze

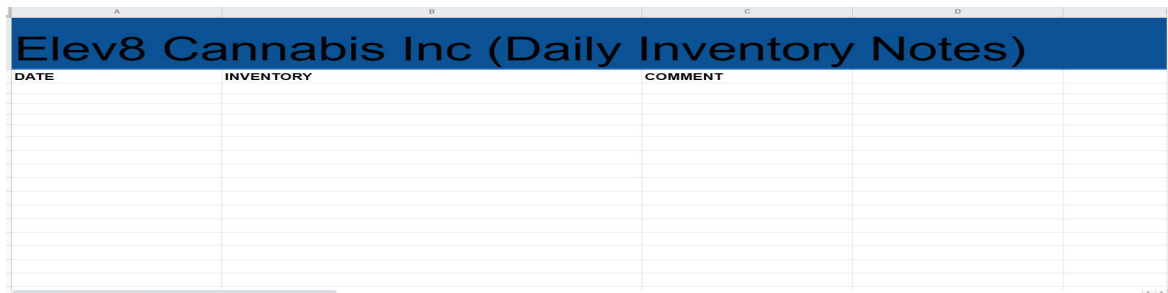



M00000887323	Tropical Trainwreck
M00000885512	Guava OG
M00002016052	Raspberry Skywalker
M00001892925	Pear Herer

Item Number	Edibles
M00002062519	Mango Punch Lotis Day Chew
M00002062519	Mango Punch Lotis Day Chew
M00001743606	Strawberry Lemonade Lotis Chew
M00001743606	Strawberry Lemonade Lotis Chew
M00002134617	Blueberry Dream Lotis Night Chew
M00002042612	Lotis Berry Bliss
M00001869112	Betty's Eddies Cherry Ache away eddies
M00001869112	Betty's Eddies Cherry Ache away eddies
M00001887305	Betty's Eddies Passion Fruit Smashin' Passion
M00001887305	Betty's Eddies Passion Fruit Smashin' Passion
M00002104504	Betty's Eddies Take it Easy Eddies Pineapple Orange
M00002104504	Betty's Eddies Take it Easy Eddies Pineapple Orange
M00001951162	Betty's Eddies Bedtime Bettys Raspberry Creme
M00001951162	Betty's Eddies Bedtime Bettys Raspberry Creme
M00001796133	Betty's Eddies Elderberry Immunity
M00001796133	Betty's Eddies Elderberry Immunity
M00001804721	Betty's Eddies Peach Mango for Anytime
M00001804721	Betty's Eddies Peach Mango for Anytime
M00001798908	Betty's Eddies Stawberry for anytime
M00001893503	Kanha Sour Strawberry Lemonade
M00001880207	Kanha Sour Cherry Limeade



M00001433404	Kanha Blue Raspberry Tranquility Gummies
M00001250937	Kanha Sativa Gummies Cran Pomegranate Punch
M00001251028	Kanha Passion Fruit Paradise
M00001244219	Sweet Talk Cherry Yuzu
M0000137819	Bubby's Baked Goods Chocolate Chip
M0000137819	Bubby's Baked Goods Chocolate Chip
M00001959801	Standard Farms Chocolate Covered Coffee Beans
M00000960749	Bhang Choco Dark Chocolate
M00001117008	1906 Bliss Pouch
M00001117009	1906 Bliss Tin
M00001116927	1906 Chill Pouch
M00000932502	1906 Chill Tin
M00001881942	1906 Bump Pouch
M00001881942	1906 Bump Pouch
M00001967212	1906 Bump Tin
M00001117204	1906 Genius Pouch
M00001117205	1906 Genius Tin
M00001117010	1906 Love Pouch
M00001117133	1906 Love Tin
M00001117006	1906 Go Pouch
M00001117007	1906 Go Tin
M00001996216	1906 Midnight Tin

[illegible][illegible]



NOTES AND TASKS

<input type="checkbox"/>	Date	Employee	Write a note ...
<input checked="" type="checkbox"/>	EVERYDAY	Elev8 Cannabis	TREAT EVERYONE LIKE GOLD
<input type="checkbox"/>	EVERYDAY	Elev8 Cannabis	Did you dust around the store and take out the garbage today?
<input type="checkbox"/>	2/14/2023	Jemimah Eseh	1. Mail boxes of bags to eugenes. 2. Attach all inventory spreadsheets to computer home screen. 4: Complete store supplies list.
<input type="checkbox"/>	2/15/2023	Jemimah Eseh	Call for Jerry from George Cortez with Logik. Phone #: 302-257-2481. Product Exchange issue: Cx (Alex Nunez 978-771-4794)claims Alro Battery stopped working three days after purchase. He was advised to clean and see if there is any difference. Cx could come back, please consider reaching out to vendor to see how they would like to proceed.
<input type="checkbox"/>			
<input type="checkbox"/>			

+ ☰ To do ▾
Hot Lists ▾



REGULATORY CITE NO. 2 – 935 CMR 500.105(8)(b) & (f): A Marijuana Establishment shall maintain a real-time inventory of the Marijuana and Marijuana Products at its facility. The failure to enter inventory into Metrc may result in the suspension or revocation of a Marijuana Establishment License.

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A. 1A40A0300004DBE000002286 Vendor Sample Chem Fuego #2 1G After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metrc as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

B. 1A40A0300004A9D000002834 Tincture Daily Drops 30ML After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metrc as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

C. 1A40A030000025A000063595 Go Sour Strawberry Gummies 5mg



20pk After conducting an inventory at the end of February the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

D. 1A40A0100001AF5000019242 Natures heritage Pre roll Forbidden Zkittlez 1g After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

E. 1A40A0300004E21000005269 Dream Tincture Concentrate After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

F. 1A40A01000012C2000032440 1906 Bliss Pouch
Expired product Blended up on 1/17/2023 by Zjontaye Gordon and Jerry Francois

G. 1A40A01000012C2000025844 1906 Bliss Pouch
Expired product Blended up on 1/17/2023 by Zjontaye Gordon and Jerry Francois

H. 1A40A01000012C2000025846 1906 Genius Pouch
Expired product Blended up on 1/17/2023 by Zjontaye Gordon and Jerry Francois



I. 1A40A01000012C2000022902 1906 Go Tin

Expired product Blended up on 1/17/2023 by Zjontaye Gordon and Jerry Francois

J. 1A40A0100000963000008520 Harlequin Joint

Expired product Blended up on 1/17/2023 by Zjontaye Gordon and Jerry Francois

K. 1A40A0100000A2E000069422 Jungle Sunset Pre Roll 1G

After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

L. 1A40A01000029CD000008136 Blue Dream Pre Roll 1g

After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

M. 1A40A0300004DBE000002538 Green Meadows Chem

Fuego #2 1g After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

N. 1A40A0300003779000015188 Vape Stonefruit 0.5g

After conducting an inventory at the end of February, the above product was not located in the vault. Product shows



in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and

inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

O. 1A40A0300001771000015737 Cranberry Pomegranate Gummies 1:1:1 100 MG After conducting an inventory at the end of February, the above product was not located in the vault. Product shows in Metric as zero. We have checked the waste logs and could not locate any details of the above product. We are unsure of previous management's possible API issues and inventory control. We have since made actions to make sure our inventory and waste is properly documented monthly moving forward.

REGULATORY CITE NO. 3 – 935 CMR 500.105(8)(c)-(d): A Marijuana Establishment shall conduct a monthly inventory of Marijuana. The inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

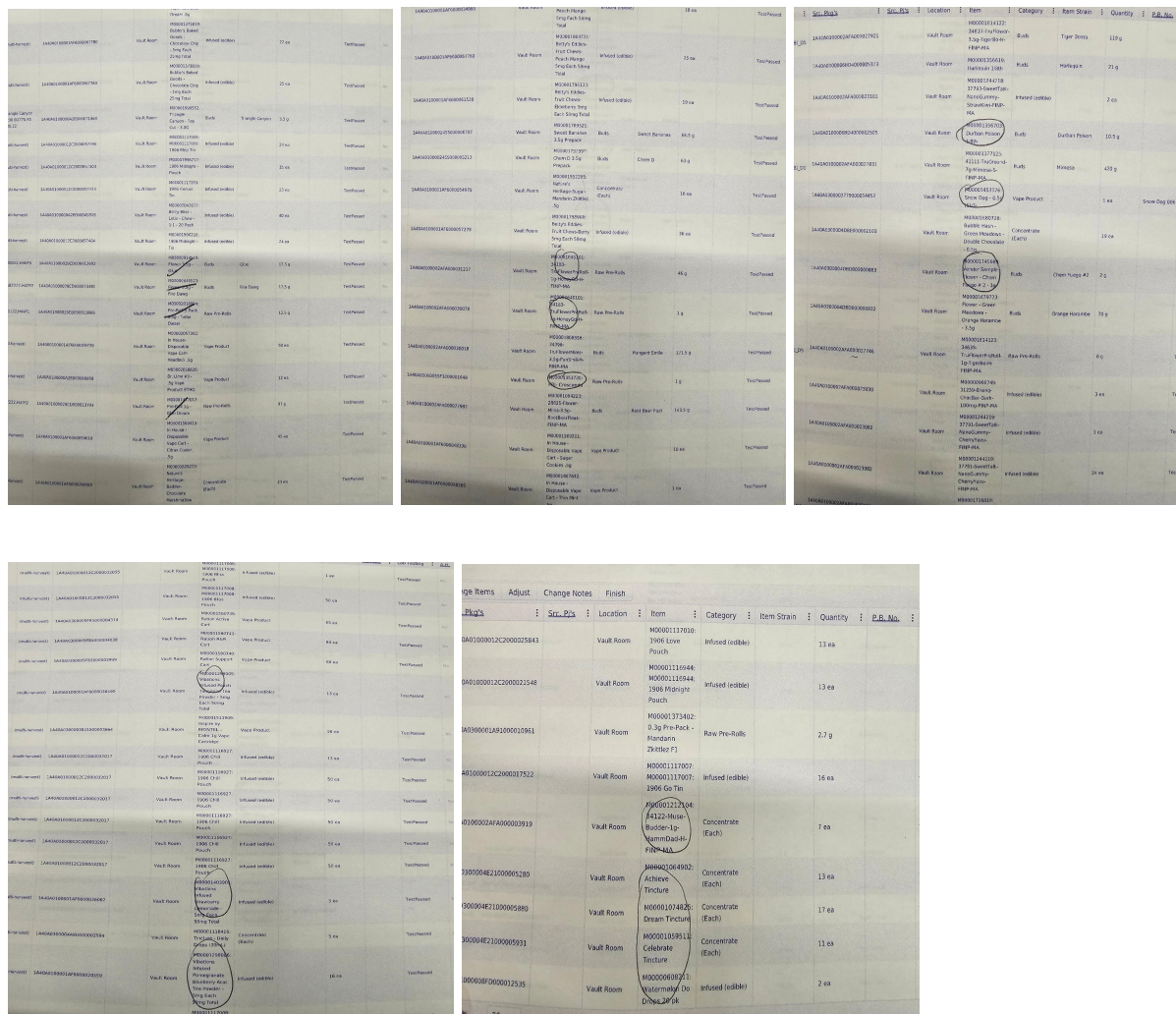
3. In November 2022 and January 2023, Elev8 conducted an audit of its inventory but did not include the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory. Further, there is no evidence of a monthly inventory audit conducted in December 2022. Elev8 must provide the Commission with a complete and compliant record of the inventory audits conducted for the months of November 2022, December 2022, and January 2023 that contains the required information.

November 2022

Elev8 Cannabis was closed for the majority for this time. Nonetheless, camera records show Mr Seun Adedeji and Jerry Francois completing the inventory records below on November 27th 2022. The following are all audits noted for the month of November. In addition an inventory cover letter has been established towards better accounts of

[illegible][illegible][illegible]

Camera records show Jerry Francois completing the inventory records below on December 30th 2022. The following are all audits noted for the month of December.



January 2023

Inventory Cover Letter

Agent 1: Jimmy Francis
Title: General Manager
Date: 11-17-23

Agent 2: Jonathan
Title: ASM/ILH
Date: 11/17/23

Summary of Inventory Findings

8849 was not in vault cover 2802, 5849, 5847, 5844, 5848, 5846, 1930, 1972, 1973 was expired, 1974, 1975, 1976, 2433, 2434, 2435, 2436, 2437, 2438, 2440 all bliss pouches expired, 2441 bliss pouch expired

Agent 1: Jimmy Francis
Agent 2: Jonathan

January 2023

Inventory Cover Letter

Agent 1: Jonathan
Title: Receptionist
Date: 1/31/23

Agent 2: _____
Title: _____
Date: _____

Summary of Inventory Findings

2619 off by one ~~per extra~~
2621 an extra
8222 off by 2, 8223 (1) extra one.
8225 off by 4, 8227 off by 11.
8229 off by 2, 8231 off by 1
8232 off by 5, 8233 off by 2
8102 off by 2, 8284 off by 2
D102 +1, 7054 -2, 6930 -13, 7001 +1
1577 -3, 1524 +3, 8060 +2, 8061 -3
8061 -3, 8340 +2, 4363 +4, 1364 +3,
4389 -1

All of the last 4 Melco I've adjusted, these are quality of multiple same products that was being sold, now all quantities are accurate.

Agent 1: Jonathan
Agent 2: Jimmy

January 2023

SKU	Quantity	Unit Cost	Total Cost	Inventory Value	Inventory Status
1113	1	1.00	1.00	1.00	OK
1114	1	1.00	1.00	1.00	OK
1115	1	1.00	1.00	1.00	OK
1116	1	1.00	1.00	1.00	OK
1117	1	1.00	1.00	1.00	OK
1118	1	1.00	1.00	1.00	OK
1119	1	1.00	1.00	1.00	OK
1120	1	1.00	1.00	1.00	OK
1121	1	1.00	1.00	1.00	OK
1122	1	1.00	1.00	1.00	OK
1123	1	1.00	1.00	1.00	OK
1124	1	1.00	1.00	1.00	OK
1125	1	1.00	1.00	1.00	OK
1126	1	1.00	1.00	1.00	OK
1127	1	1.00	1.00	1.00	OK
1128	1	1.00	1.00	1.00	OK
1129	1	1.00	1.00	1.00	OK
1130	1	1.00	1.00	1.00	OK
1131	1	1.00	1.00	1.00	OK
1132	1	1.00	1.00	1.00	OK
1133	1	1.00	1.00	1.00	OK
1134	1	1.00	1.00	1.00	OK
1135	1	1.00	1.00	1.00	OK
1136	1	1.00	1.00	1.00	OK
1137	1	1.00	1.00	1.00	OK
1138	1	1.00	1.00	1.00	OK
1139	1	1.00	1.00	1.00	OK
1140	1	1.00	1.00	1.00	OK
1141	1	1.00	1.00	1.00	OK
1142	1	1.00	1.00	1.00	OK
1143	1	1.00	1.00	1.00	OK
1144	1	1.00	1.00	1.00	OK
1145	1	1.00	1.00	1.00	OK
1146	1	1.00	1.00	1.00	OK
1147	1	1.00	1.00	1.00	OK
1148	1	1.00	1.00	1.00	OK
1149	1	1.00	1.00	1.00	OK
1150	1	1.00	1.00	1.00	OK
1151	1	1.00	1.00	1.00	OK
1152	1	1.00	1.00	1.00	OK
1153	1	1.00	1.00	1.00	OK
1154	1	1.00	1.00	1.00	OK
1155	1	1.00	1.00	1.00	OK
1156	1	1.00	1.00	1.00	OK
1157	1	1.00	1.00	1.00	OK
1158	1	1.00	1.00	1.00	OK
1159	1	1.00	1.00	1.00	OK
1160	1	1.00	1.00	1.00	OK
1161	1	1.00	1.00	1.00	OK
1162	1	1.00	1.00	1.00	OK
1163	1	1.00	1.00	1.00	OK
1164	1	1.00	1.00	1.00	OK
1165	1	1.00	1.00	1.00	OK
1166	1	1.00	1.00	1.00	OK
1167	1	1.00	1.00	1.00	OK
1168	1	1.00	1.00	1.00	OK
1169	1	1.00	1.00	1.00	OK
1170	1	1.00	1.00	1.00	OK
1171	1	1.00	1.00	1.00	OK
1172	1	1.00	1.00	1.00	OK
1173	1	1.00	1.00	1.00	OK
1174	1	1.00	1.00	1.00	OK
1175	1	1.00	1.00	1.00	OK
1176	1	1.00	1.00	1.00	OK
1177	1	1.00	1.00	1.00	OK
1178	1	1.00	1.00	1.00	OK
1179	1	1.00	1.00	1.00	OK
1180	1	1.00	1.00	1.00	OK
1181	1	1.00	1.00	1.00	OK
1182	1	1.00	1.00	1.00	OK
1183	1	1.00	1.00	1.00	OK
1184	1	1.00	1.00	1.00	OK
1185	1	1.00	1.00	1.00	OK
1186	1	1.00	1.00	1.00	OK
1187	1	1.00	1.00	1.00	OK
1188	1	1.00	1.00	1.00	OK
1189	1	1.00	1.00	1.00	OK
1190	1	1.00	1.00	1.00	OK
1191	1	1.00	1.00	1.00	OK
1192	1	1.00	1.00	1.00	OK
1193	1	1.00	1.00	1.00	OK
1194	1	1.00	1.00	1.00	OK
1195	1	1.00	1.00	1.00	OK
1196	1	1.00	1.00	1.00	OK
1197	1	1.00	1.00	1.00	OK
1198	1	1.00	1.00	1.00	OK
1199	1	1.00	1.00	1.00	OK
1200	1	1.00	1.00	1.00	OK

January 2023

SKU	Quantity	Unit Cost	Total Cost	Inventory Value	Inventory Status
1113	1	1.00	1.00	1.00	OK
1114	1	1.00	1.00	1.00	OK
1115	1	1.00	1.00	1.00	OK
1116	1	1.00	1.00	1.00	OK
1117	1	1.00	1.00	1.00	OK
1118	1	1.00	1.00	1.00	OK
1119	1	1.00	1.00	1.00	OK
1120	1	1.00	1.00	1.00	OK
1121	1	1.00	1.00	1.00	OK
1122	1	1.00	1.00	1.00	OK
1123	1	1.00	1.00	1.00	OK
1124	1	1.00	1.00	1.00	OK
1125	1	1.00	1.00	1.00	OK
1126	1	1.00	1.00	1.00	OK
1127	1	1.00	1.00	1.00	OK
1128	1	1.00	1.00	1.00	OK
1129	1	1.00	1.00	1.00	OK
1130	1	1.00	1.00	1.00	OK
1131	1	1.00	1.00	1.00	OK
1132	1	1.00	1.00	1.00	OK
1133	1	1.00	1.00	1.00	OK
1134	1	1.00	1.00	1.00	OK
1135	1	1.00	1.00	1.00	OK
1136	1	1.00	1.00	1.00	OK
1137	1	1.00	1.00	1.00	OK
1138	1	1.00	1.00	1.00	OK
1139	1	1.00	1.00	1.00	OK
1140	1	1.00	1.00	1.00	OK
1141	1	1.00	1.00	1.00	OK
1142	1	1.00	1.00	1.00	OK
1143	1	1.00	1.00	1.00	OK
1144	1	1.00	1.00	1.00	OK
1145	1	1.00	1.00	1.00	OK
1146	1	1.00	1.00	1.00	OK
1147	1	1.00	1.00	1.00	OK
1148	1	1.00	1.00	1.00	OK
1149	1	1.00	1.00	1.00	OK
1150	1	1.00	1.00	1.00	OK
1151	1	1.00	1.00	1.00	OK
1152	1	1.00	1.00	1.00	OK
1153	1	1.00	1.00	1.00	OK
1154	1	1.00	1.00	1.00	OK
1155	1	1.00	1.00	1.00	OK
1156	1	1.00	1.00	1.00	OK
1157	1	1.00	1.00	1.00	OK
1158	1	1.00	1.00	1.00	OK
1159	1	1.00	1.00	1.00	OK
1160	1	1.00	1.00	1.00	OK
1161	1	1.00	1.00	1.00	OK
1162	1	1.00	1.00	1.00	OK
1163	1	1.00	1.00	1.00	OK
1164	1	1.00	1.00	1.00	OK
1165	1	1.00	1.00	1.00	OK
1166	1	1.00	1.00	1.00	OK
1167	1	1.00	1.00	1.00	OK
1168	1	1.00	1.00	1.00	OK
1169	1	1.00	1.00	1.00	OK
1170	1	1.00	1.00	1.00	OK
1171	1	1.00	1.00	1.00	OK
1172	1	1.00	1.00	1.00	OK
1173	1	1.00	1.00	1.00	OK
1174	1	1.00	1.00	1.00	OK
1175	1	1.00	1.00	1.00	OK
1176	1	1.00	1.00	1.00	OK
1177	1	1.00	1.00	1.00	OK
1178	1	1.00	1.00	1.00	OK
1179	1	1.00	1.00	1.00	OK
1180	1	1.00	1.00	1.00	OK
1181	1	1.00	1.00	1.00	OK
1182	1	1.00	1.00	1.00	OK
1183	1	1.00	1.00	1.00	OK
1184	1	1.00	1.00	1.00	OK
1185	1	1.00	1.00	1.00	OK
1186	1	1.00	1.00	1.00	OK
1187	1	1.00	1.00	1.00	OK
1188	1	1.00	1.00	1.00	OK
1189	1	1.00	1.00	1.00	OK
1190	1	1.00	1.00	1.00	OK
1191	1	1.00	1.00	1.00	OK
1192	1	1.00	1.00	1.00	OK
1193	1	1.00	1.00	1.00	OK
1194	1	1.00	1.00	1.00	OK
1195	1	1.00	1.00	1.00	OK
1196	1	1.00	1.00	1.00	OK
1197	1	1.00	1.00	1.00	OK
1198	1	1.00	1.00	1.00	OK
1199	1	1.00	1.00	1.00	OK
1200	1	1.00	1.00	1.00	OK

Qty	Unit	Material	Unit	Price	Quantity	Unit Cost	Total Cost	Inventory
1	kg	1113	kg	1.00	1	1.00	1.00	OK
1	kg	1114	kg	1.00	1	1.00	1.00	OK
1	kg	1115	kg	1.00	1	1.00	1.00	OK
1	kg	1116	kg	1.00	1	1.00	1.00	OK
1	kg	1117	kg	1.00	1	1.00	1.00	OK
1	kg	1118	kg	1.00	1	1.00	1.00	OK
1	kg	1119	kg	1.00	1	1.00	1.00	OK
1	kg	1120	kg	1.00	1	1.00	1.00	OK
1	kg	1121	kg	1.00	1	1.00	1.00	OK
1	kg	1122	kg	1.00	1	1.00	1.00	OK
1	kg	1123	kg	1.00	1	1.00	1.00	OK
1	kg	1124	kg	1.00	1	1.00	1.00	OK
1	kg	1125	kg	1.00	1	1.00	1.00	OK
1	kg	1126	kg	1.00	1	1.00	1.00	OK
1	kg	1127	kg	1.00	1	1.00	1.00	OK
1	kg	1128	kg	1.00	1	1.00	1.00	OK
1	kg	1129	kg	1.00	1	1.00	1.00	OK
1	kg	1130	kg	1.00	1	1.00	1.00	OK
1	kg	1131	kg	1.00	1	1.00	1.00	OK
1	kg	1132	kg	1.00	1	1.00	1.00	OK
1	kg	1133	kg	1.00	1	1.00	1.00	OK
1	kg	1134	kg	1.00	1	1.00	1.00	OK
1	kg	1135	kg	1.00	1	1.00	1.00	OK
1	kg	1136	kg	1.00	1	1.00	1.00	OK
1	kg	1137	kg	1.00	1	1.00	1.00	OK
1	kg	1138	kg	1.00	1	1.00	1.00	OK
1	kg	1139	kg	1.00	1	1.00	1.00	OK
1	kg	1140	kg	1.00	1	1.00	1.00	OK
1	kg	1141	kg	1.00	1	1.00	1.00	OK
1	kg	1142	kg	1.00	1	1.00	1.00	OK
1	kg	1143	kg	1.00	1	1.00	1.00	OK
1	kg	1144	kg	1.00	1	1.00	1.00	OK
1	kg	1145	kg	1.00	1	1.00	1.00	OK
1	kg	1146	kg	1.00	1	1.00	1.00	OK
1	kg	1147	kg	1.00	1	1.00	1.00	OK
1	kg	1148	kg	1.00	1	1.00	1.00	OK
1	kg	1149	kg	1.00	1	1.00	1.00	OK
1	kg	1150	kg	1.00	1	1.00	1.00	OK
1	kg	1151	kg	1.00	1	1.00	1.00	OK
1	kg	1152	kg	1.00	1	1.00	1.00	OK
1	kg	1153	kg	1.00	1	1.00	1.00	OK
1	kg	1154	kg	1.00	1	1.00	1.00	OK
1	kg	1155	kg	1.00	1	1.00	1.00	OK
1	kg	1156	kg	1.00	1	1.00	1.00	OK
1	kg	1157	kg	1.00	1	1.00	1.00	OK
1	kg	1158	kg	1.00	1	1.00	1.00	OK
1	kg	1159	kg	1.00	1	1.00	1.00	OK
1	kg	1160	kg	1.00	1	1.00	1.00	OK
1	kg	1161	kg	1.00	1	1.00	1.00	OK
1	kg	1162	kg	1.00	1	1.00	1.00	OK
1	kg	1163	kg	1.00	1	1.00	1.00	OK
1	kg	1164	kg	1.00	1	1.00	1.00	OK
1	kg	1165	kg	1.00	1	1.00	1.00	OK
1	kg	1166	kg	1.00	1	1.00	1.00	OK
1	kg	1167	kg	1.00	1	1.00	1.00	OK
1	kg	1168	kg	1.00	1	1.00	1.00	OK
1	kg	1169	kg	1.00	1	1.00	1.00	OK
1	kg	1170	kg	1.00	1	1.00	1.00	OK
1	kg	1171	kg	1.00	1	1.00	1.00	OK
1	kg	1172	kg	1.00	1	1.00	1.00	OK
1	kg	1173	kg	1.00	1	1.00	1.00	OK
1	kg	1174	kg	1.00	1	1.00	1.00	OK
1	kg	1175	kg	1.00	1	1.00	1.00	OK
1	kg	1176	kg	1.00	1	1.00	1.00	OK
1	kg	1177	kg	1.00	1	1.00	1.00	OK
1	kg	1178	kg	1.00	1	1.00	1.00	OK
1	kg	1179	kg	1.00	1	1.00	1.00	OK
1	kg	1180	kg	1.00	1	1.00	1.00	OK
1	kg	1181	kg	1.00	1	1.00	1.00	OK
1	kg	1182	kg	1.00	1	1.00	1.00	OK
1	kg	1183	kg	1.00	1	1.00	1.00	OK
1	kg	1184	kg	1.00	1	1.00	1.00	OK
1	kg	1185	kg	1.00	1	1.00	1.00	OK
1	kg	1186	kg	1.00	1	1.00	1.00	OK
1	kg	1187	kg	1.00	1	1.00	1.00	OK
1	kg	1188	kg	1.00	1	1.00	1.00	OK
1	kg	1189	kg	1.00	1	1.00	1.00	OK
1	kg	1190	kg	1.00	1	1.00	1.00	OK
1	kg	1191	kg	1.00	1	1.00	1.00	OK
1	kg	1192	kg	1.00	1	1.00	1.00	OK
1	kg	1193	kg	1.00	1	1.00	1.00	OK
1	kg	1194	kg	1.00	1	1.00	1.00	OK
1	kg	1195	kg	1.00	1	1.00	1.00	OK
1	kg	1196	kg	1.00	1	1.00	1.00	OK
1	kg	1197	kg	1.00	1	1.00	1.00	OK
1	kg	1198	kg	1.00	1	1.00	1.00	OK
1	kg	1199	kg	1.00	1	1.00	1.00	OK
1	kg	1200	kg	1.00	1	1.00	1.00	OK



REGULATORY CITE NO. 4 – 935 CMR 500.105(8)(g): Any distribution of Marijuana or Marijuana Products shall be tracked in the Commission’s designated Seed-to-sale System of Record (herein, “Metric”).

4. Between June 8, 2022 and January 11, 2023, approximately 9,908 sales transactions at Elev8 were recorded under a manager or owner’s name and not the registered Marijuana Establishment Agent (“Agent”) who conducted the transaction. Elev8 must reconcile its Point-of-sale records with Metric to accurately reflect the Agents who conducted sales.

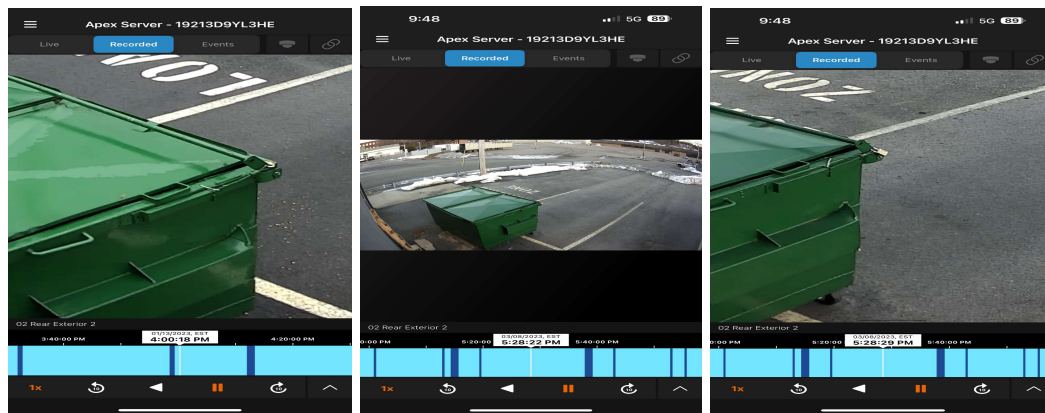
Using Metric and our POS Dutchie representatives' help, we were able to update the point of sales records to accurately reflect the agents who conducted sales. It is important to note here that both vendors were hesitant at first to prevent any legal implications on their end. While sales will be properly recorded moving forward, it would take adjusting up to 9908 sales individually to correct the past. Even then, we cannot create API keys for employees no longer with us, as such we would have to use master API keys representing the owner. Which would bring us to the same position. Please see attachments for your reference.



REGULATORY CITE NO. 5 – 935 CMR 500.105(12)(a): All exterior waste receptacles located on the Marijuana Establishment’s Premises shall be locked and secured to prevent unauthorized access.

5. On January 11, 2023, Enforcement staff observed that Elev8’s exterior dumpster was not locked to prevent unauthorized access after receiving a Notice of Deficiency on September 8, 2022 for the same violation. Elev8 must demonstrate that its exterior the dumpster is locked and is able to prevent unauthorized access.

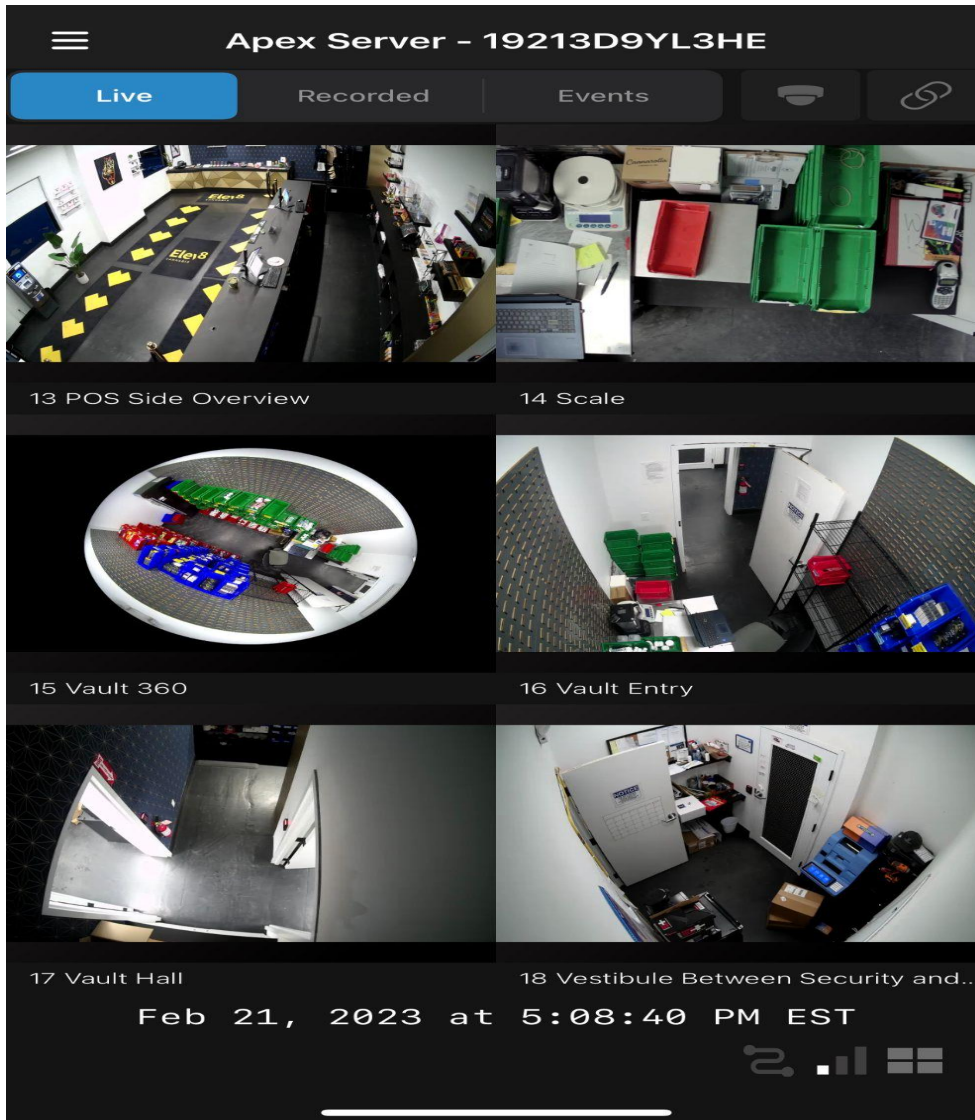
Providing assurance that the dumpster will remain locked and has been since the last visit from the CCC. Please see the images below.



REGULATORY CITE NO. 6 – 935 CMR 500.110(5)(f): All security equipment shall be in good working order and shall be inspected and tested at regular intervals, not to exceed 30 calendar days from the previous inspection and test.

6. On January 11, 2023, Enforcement staff observed that one of Elev8’s vault cameras was inoperable and Elev8 was unable to produce any video records during the time period of December 16, 2022–January 11, 2023 for the inoperable camera. Elev8 must provide verification that the inoperable camera in its vault is currently operating and is able to produce video records for inspection.

Providing assurance that vault cameras are working. Our General Manager understands ensuring cameras are working daily. Especially towards being able to alert the ccc on time of any incidents. Please see the images below.





REGULATORY CITE NO. 7 – 935 CMR 500.110(9)(a)1. & (9)(b): A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of the discovery of inventory discrepancies within 24 hours of the incident and submit an incident report detailing the circumstances of the event, any corrective action taken, and confirmation that Law Enforcement Authorities were notified, within ten business days of discovery.

7. On December 10 and 16, 2022, and January 7, 2023, Elev8 negatively adjusted packages (i.e., manually adjusted the reported quantity of Marijuana a package has in Metrc, outside of a sales transaction) with Metrc tag no. 1A40A01000029CD000014076 by two 1-gram pre-rolls, 1A40A0300004A9D000002620 by four 30-milliliter tinctures, and 1A40A0100000A2E000069424 by two 1-gram pre-rolls. In Elev8's Metrc package adjustment records, Elev8 described the negative adjustments as an "entry error" and noted that the reason for adjustment was an "inventory audit" and in three instances "API errors." Elev8 did not notify the Commission of any of these inventory discrepancies within 24 hours nor submit an incident report within ten days. Elev8 must formally notify the Commission of these inventory discrepancies by submitting incident reports for the three Metrc packages identified above.

Please see incident reports attached for Cite NO.7



REGULATORY CITE NO. 8 – 935 CMR 500.110(9)(a)7. & (9)(b): A Marijuana Establishment shall notify the Commission of events that requires response by local law enforcement within 24 hours of the incident and submit an incident report which details the circumstances of the event, and any corrective action taken, and confirmation that Law Enforcement Authorities were notified, within ten calendar days.

8. On August 14, August 23, September 3, October 2, and October 3, 2022, the Athol police department responded to 911 calls and alarms at Elev8's facility. Elev8 did not notify the Commission of any of these incidents within 24 hours. Elev8 also did not submit incident reports for these events within ten calendar days. On November 21, 2022, Elev8 submitted untimely incident reports for Athol police department responses on September 3 and October 3, 2022. Elev8 never notified the Commission of Athol police department responses made on August 14, August 23, and October 2. Elev8 must formally notify the Commission of the August 14, August 23, and October 2 incidents by submitting incident reports for those events.

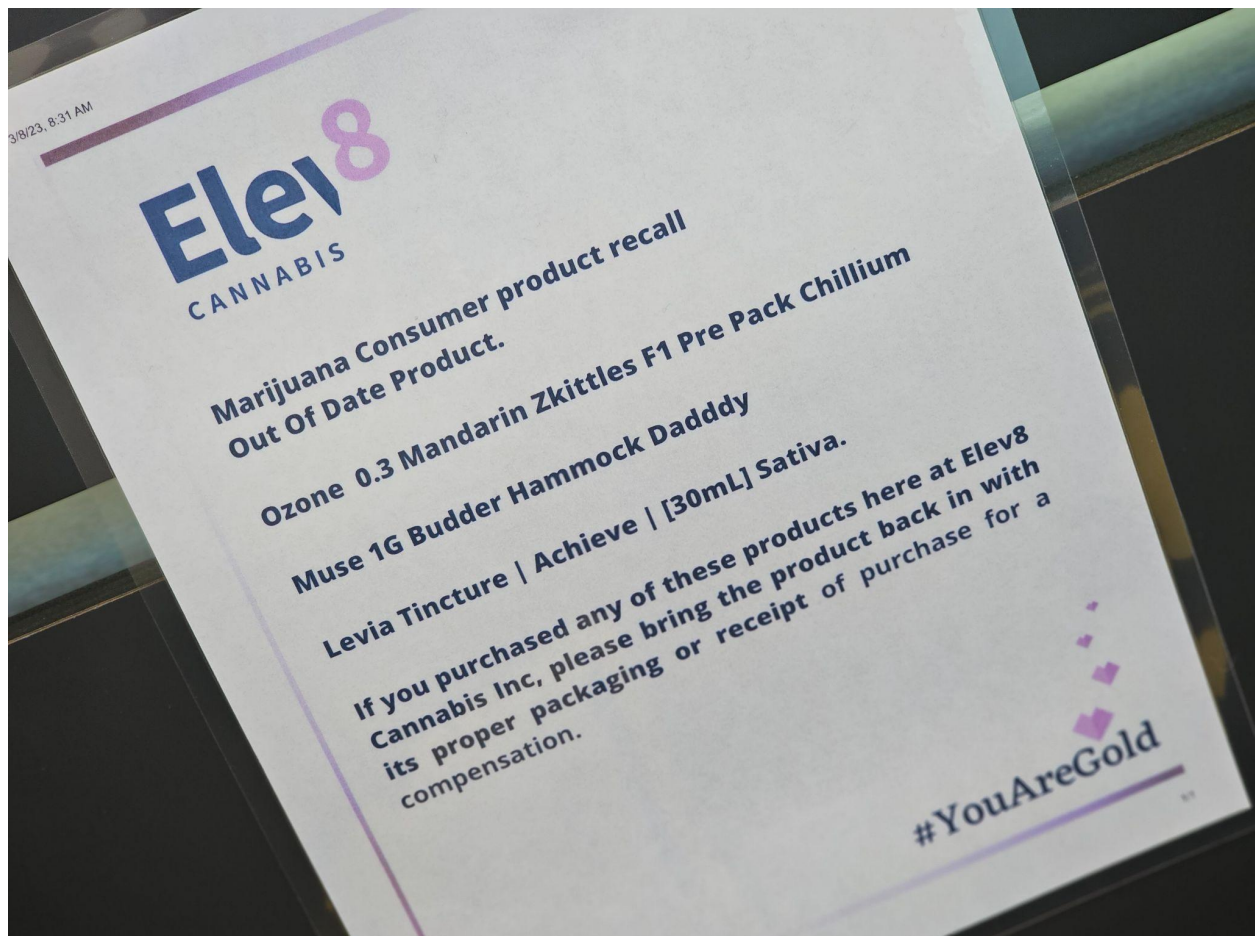
Please see incident reports attached for Cite NO. 8



REGULATORY CITE NO. 9 – 935 CMR 500.160(5): Marijuana or Marijuana Products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, Transferred or otherwise conveyed until retested.

9. On January 11, 2023, during a Metrc audit of Elev8's sales records, Enforcement staff observed that Elev8 sold three Marijuana Products – Metrc packages 1A40A0300001A91000012585, 1A40A0100002AFA000008580, and 1A40A0300004E21000005838 – with expired test results. Elev8 must recall the three expired Marijuana Products sold to customers and provide verification of the consumer recall to the Commission.

We are committed to treating everyone like gold and will prioritize making amends where these expired product sales are concerned. Please see the recall statement attached below.





REGULATORY CITE NO. 10 – 935 CMR 500.320(4): An unacceptable Plan of Correction shall be amended and resubmitted within five business days after receipt of such notice.

10. On September 8 and 30, 2022, Enforcement staff issued Notices of Deficiency (NOD) to Elev8. On September 21, 2022, Elev8 submitted a Plan of Correction (POC) in response to the September 8, 2022 NOD. On September 27, 2022, Enforcement staff notified Elev8 that components of its plan are rejected. Elev8 did not submit an amended POC within five business days of Enforcement staff's rejection of the POC. Elev8 must submit an acceptable amended POC for the September 8 and 30, 2022 NOD.

To the best of our understanding, the September NOD was for inventory discrepancies that were not reported to the Commission and were adjusted in Metrc without proper basis or rationale to support the adjustment reason. Please see the image below for your reference for all available inventory records in September 2022. Investigator Tim Barwise noted here that “I need evidence to support the “entry error” adjustment reason that was put into Metrc for those products. Just to reiterate, I have seen four different explanations for the inventory errors: entry error, improper returns, improper delivery intake, API errors. At this time, I cannot determine which of these caused specific discrepancies that the CCC found at the inspection. It is also worth noting that a previous GM reported in October that a discrepancy we found at the September inspection was resolved because he had found the missing marijuana. ” We would be happy to provide adjustment reasons for all entry errors and adjustments. Unfortunately upon further research, we are unable to do so as there are no detailed physical or digital records from previous employees. The reasons noted entry error, improper returns, improper delivery intake, API errors, are select issues that could interfere with proper inventory detail, as such we created standard operating procedures towards preventing a repeat and for more accurate inventory detail. Please let us know what else we can do here to show our commitment to compliance where inventory and record keeping is concerned.

[illegible][illegible]

A Message from Dutchie Support! 211974 External Inbox X

Sabrina Tollerson (Dutchie) <support@dutchie.zendesk.com> to me

Tue, Mar 7, 5:03 PM (1 day ago)

Your Support request 211974 has been updated.

Hi Shawn!

Sabrina here, following up on our call from earlier in regards to reposting sales made by past employees with bad METRC keys.

In order to requeue the sales found in Batch Mode, the API key for the employees who made those sales must be updated with a new API key added under Settings>METRC>User Keys. Since they are no longer employed you must either assign the key of someone else or you can use the Master METRC key.

From there you can then requeue those sales. I'm attaching an article for you to refer to when you are ready to do so.

[Re-submitting transactions to METRC](#)

dutchie Search... Elev8 Cannabis Dispensary Massachusetts Elev8 Cannabis (Athol)

TRACEABILITY

Integration audit

Receipt audit

Logs

Logs

METRC Errors Batch mode

Batch mode logs 08/01/2022 12:00 AM - 03/08/2023 12:00 AM Processing Actions

DUTCHIE RECEIPT ID	CUSTOMER	CUSTOMER MAID	STATUS	SALE D.	CASHER	METRC RECEIPT ID
13706181			Process...	8/15/2022, ...	Alexandria Soucie	3/7/2
27553883			Process...	1/19/2023, 1...	Seun Adeleji	3/7/2
27567876			Process...	1/19/2023, ...	Seun Adeleji	3/7/2

dutchie Search... Elev8 Cannabis Dispensary Massachusetts Elev8 Cannabis (Athol)

SETTINGS

Account

Location

Users

Devices

Receipts

Rooms

Labels

Metric

Statistics Sync User keys Tags Validate key Clear cache Settings

Search user keys...

Actions

API KEY	USERNAME
	Accounting

Dutchie Register x Dutchie Backoffice x A Message from Dutchie Support x My Drive - Google Drive x +

mail.google.com/mail/u/0/?tab=km#sent/FMfcgGrcwqVPZdmqfrJDFHFRsWL

insent

Active

1 of 103

Location

Users

Devices

Receipts

Rooms

Labels

Taxes & compliance

Fees & donations

Integrations

Time clock

Statistics

Sync

User keys

Tags

Validate key

Clear cache

Settings

Search user keys...

Actions

API KEY

USERNAME

Accounting

Accounting Elev8

As always, please let us know if there is anything else you need! Thanks again for reaching out. =)

Best,

Sabrina

Support Specialist | Support Hours: 5am to 10 pm PST

Check out our LeafLogix Status Page: <https://status.leaflogix.net/>

Chat with us: <https://dutchiepos.zendesk.com/hc/en-us>

(866) 838 - 8244 (ext 3)

Check out our Help Center!

Here's a reminder of what your ticket was about:

Sabrina Tollerson (Dutchie)

Mar 7, 2023, 2:03 PM PST

Hi Shavni

Sabrina here, following up on our call from earlier in regards to reposting sales made by past employees with bad METRC keys.

Dutchie Register x Dutchie Backoffice x A Message from Dutchie Support x My Drive - Google Drive x +

mail.google.com/mail/u/0/?tab=km#sent/FMfcgGrcwqVPZdmqfrJDFHFRsWL

insent

Active

1 of 103

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Sabrina

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Check out our Help Center!

Here's a reminder of what your ticket was about:

Sabrina Tollerson (Dutchie)

Mar 7, 2023, 2:03 PM PST

Hi Shavni

Sabrina here, following up on our call from earlier in regards to reposting sales made by past employees with bad METRC keys.

In order to requeue the sales found in Batch Mode, the API key for the employees who made those sales must be updated with a new API key added under Settings>METRC>User Keys. Since they are no longer employed you must either assign the key of someone else or you can use the Master METRC key.

From there you can then requeue those sales, I'm attaching an article for you to refer to when you are ready to do so.

[Re-submitting transactions to METRC](#)

dutchie

Search...

Diev8 Cannabis Dispensary Massachusetts

Diev8 Cannabis (Athol)

TRACEABILITY

Integration audit

Receipt audit

Logs

Logs

METRC Errors

Batch mode

9:42 PM 3/9/2023

Dutchie Register | Dutchie Backoffice | A Message from Dutchie Support | My Drive - Google Drive

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insent

Active

Google

1 of 103


dutchie Search...

Elev8 Cannabis Dispensary Massachusetts | Elev8 Cannabis (Athol)

TRACEABILITY
Integration audit
Receipt audit
Logs

Batch mode

06/01/2022 12:00 AM - 03/08/2023 12:00 AM Processing Actions

<input type="checkbox"/>	DUTCHIE RECEIPT ID	CUSTOMER	CUSTOMER MMID	STATUS	SALE D...	CASHER	METRIC RECEIPT ID	
<input type="checkbox"/>	13706181			Process...	8/15/2022...	Alexandra Soule	3/7/2	
<input type="checkbox"/>	27553883			Process...	1/19/2023, 1...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	27567876			Process...	1/19/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	27574666			Process...	1/19/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	27589272			Process...	1/19/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	27636283	Lois Sataga		Process...	1/20/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	28329333	Patricia Hutchinson		Process...	1/27/2023...	Jerry Francois	3/7/2	
<input type="checkbox"/>	28473362	James Garnache		Process...	1/28/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	28551924	Dana R Guyer		Process...	1/28/2023...	Seun Adeleji	3/7/2	
<input type="checkbox"/>	29073795	Demetrius A Dargan		Process...	2/3/2023...	Seun Adeleji	3/7/2	

Displaying 1-16 of 15 Per page

Dutchie Register | Dutchie Backoffice | A Message from Dutchie Support | My Drive - Google Drive

mail.google.com/mail/u/0/?tab=km#sent/FMfcgGrcwqVPZdmqtrJDFHFRsWL

insent

Active

Google

1 of 103

dutchie Search...

Elev8 Cannabis Dispensary Massachusetts | Elev8 Cannabis (Athol)




SETTINGS
Account
Location
Users
Devices
Receipts
Rooms
Labels
Taxes & compliance
Fees & donations
Integrations
Time clock

Metric

Statistics | Sync | **User keys** | Tags | Validate key | Clear cache | Settings

Search user keys...

Actions

API KEY	USERNAME
	Accounting
	Accounting Elev8
	
	
	

As always, please let us know if there is anything else you need! Thanks again for reaching out. =)

Best,
Sabrina
Support Specialist | Support Hours: 9am to 10 pm PST
Check out our LeafLogix Status Page: <https://status.leaflogix.net/>
Chat with us: <https://dutchiepos.zendesk.com/hc/en-us>
(866) 838 - 8244 (ext 3)
Check out our Help Center!

To add additional recipients, reply to this email

Dutchie Register

Dutchie Backoffice

Request #1791034: How would

My Drive - Google Drive

mail.google.com/mail/u/0/?tab=km#sent/FMfcgGrcwqfLLHSW7vgPIBjmXRQZ

insent

Active

Google

Compose

Inbox7

Starred

Sent1

Drafts

More

Labels+

Good, I'm satisfied

Bad, I'm unsatisfied

Here's a reminder of what this request was about:

Judy Mangrum (Metrc)
Mar 7, 2023, 16:11 CST

Hello Shawn,

We tried to contact you at 978-764-3311 but was unable to reach you. The only way to change the API key for each sale would be to edit each of the sales entered into the system. You would need to return the sale and then recreate it for each sale receipt to update the API key associated with each sale.

Best regards,

Metrc Support Team

support@metrc.com

877-566-6506

This email is a service from Metrc. Delivered by [Zendesk](#)

Shawn Robinson

shawn@elev8cannabis.com

to Timothy, Sean

9:31 PM (14 minutes ago)

☆

↶

⋮

↶ Reply

↶ Reply all

➦ Forward

Type here to search

32°F Mostly cloudy

9:45 PM 3/9/2023

3/8/2023

Incident Date 1/7/2023

1A40A0100000A2E000069424

Cream & Sugar #2 1g pre roll

Adjustments of negative 2 made to Metric due to API issues between Dutchie and Metric for items sold, and entry errors. Adjustments were made to properly reflect product quantities in vault.

3/8/2023

Incident Date 12/16/2022

1A40A0300004A9D000002620

Daily Drops Tinctures

Adjustments of negative 4 made to Metric due to API issues between Dutchie and Metric for items sold, and entry errors. Adjustments were made to properly reflect product quantities in vault.

3/8/2023

Incident Date 12/10/2022

1A40A01000029CD000014076

Rain Maker 1 gram pre roll

Adjustments of negative 2 made to Metric due to API issues between Dutchie and Metric for items sold, and entry errors. Adjustments were made to properly reflect product quantities in vault.



3/6/2023

Incident 8/14/2022

Athol Police were called by a concerned citizen, stating they saw a male enter the building and the store was supposed to be closed.

Athol police arrived at 9:39pm confirmed male who entered store was in fact the owner of Elev8 Cannabis. No issues reported by Athol Police.



3/6/2023

Incident 8/23/2022

Alarm company called Athol police in regard to front door and lobby alarm going off.

Athol police arrived at 6:56am spoke to owner on site, alarm was set off by accident. Athol police left at 7:10am



3/6/2023

Incident 10/2/2022

Athol police received a call from a concerned family member and requested a welfare check on owner.

Athol police arrived at 7:54pm spoke to owner of Elev8 cannabis. Everything checked out and was fine.
Athol police left at 8:10pm.



How to make adjustments on metric?

- Log into Metrc
- Click Packages
- Click active
- Click on a product that needs adjustments. (Make sure it is highlighted)
- Scroll back to the top menu and click adjust
- Adjust new quantities and give detailed notes for a reason.
(Making adjustments due to waste log, inventory intake, api key, entry error, improper returns must be explained in details – “Be specific to products and tell the truth”)

Adjusting Finished Products on metric

- Log into metric
- Click Packages
- Click active
- Click on finished product (make sure it's highlighted) and scroll back to the top
- Click finish on the menu at the top

NO ADJUSTMENTS MADE WITHOUT A FULL INVENTORY COUNT



CUSTOMER RETURN

- All products must be returned within 24 hours of purchase and no longer.
- Cannabis products cannot have been consumed or/and must look as new as possible
- Keep to Elev8 values throughout all interactions with customer

Treat everyone like gold.

- Please reach out to the vendor as soon as possible if a return or exchange takes place.
- Provide a detailed incident report as needed.

VENDOR RETURN

- IA delivery return depends on agreement with the vendor.
- Please reach out to vendor as soon as possible
- Keep to Elev8 values throughout all interactions with vendor

Treat everyone like gold.

- Provide a detailed incident report if needed.

DUTCHIE INTAKE

[Process returns, exchanges, and voids at the Register – Dutchie](#)



1. Log into Metric
2. Click packages
3. Click active
4. Print physical copy as a PDF and as needed. (Use print symbol on top right)
 - Print inventory cover letter and include details for every adjustment made with specifics to products
5. Match products with details on metric (as printed)
6. Match products count with metric products count and make necessary adjustment on metric and on the inventory cover letter.

How to make adjustments on metric?

- Log into Metric
- Click Packages
- Click active
- Click on a product that needs adjustments. (Make sure it is highlighted)
- Scroll back to the top menu and click adjust
- Adjust new quantities and give detailed notes for a reason.
(Making adjustments due to waste log, inventory intake, api key, entry error, improper returns must be explained in details – “Be specific to products and tell the truth”)

Adjusting Finished Products on metric

- Log into metric
 - Click Packages
 - Click active
 - Click on finished product (make sure it's highlighted) and scroll back to the top
 - Click finish on the menu at the top
7. Confirm and recount quantities making sure it is accurate.
 8. Replicate adjustments made on metric to dutchie.
 9. Do a final check making sure all counts are accurate.

Inventory Cover Letter

Agent 1:

Agent 2:

Title:

Title:

Date:

Date:

Summary of inventory findings

Agent 1: _____
Signature

Agent 2: _____
Signature



Dear Commissioners Shannon, Ava, Kimberly, and Mr Bruce,

After careful reflection on the allegations brought against Elev8Cannabis Inc. and myself, we acknowledge and respectfully take full responsibility for our actions. We recognize that our inability to adequately retain healthy helpers, employees, and volunteers, coupled with my limitations as an owner in ensuring compliance and safety, contributed to the issues. Even with the best intentions, our actions fell short.

We find the video in question to be inexcusable, despite the disclaimer. We should have taken full responsibility from the outset. We apologize sincerely for our initial lack of accountability and commit to learning from our mistakes. We acknowledge that revocation may be the appropriate action, and while we are not opposed to it, we are willing to collaborate with the commissioners to explore ways to continue pursuing our American dream within the legal cannabis industry.

Thank you for your time and consideration.

Sincerely,

Seun Adedeji,

Owner and CEO Elev8

PRIVILEGED & CONFIDENTIAL

Memorandum

To: Travis Ahern, Executive Director
Cc: Nomxolisi Jones, Chief of Investigations and Enforcement
Michael Baker, Deputy General Counsel
Steven Laduzinski, Associate General Counsel
Tim Goodin, Enforcement Counsel
Olivia Koval, Director of Licensing
Katherine Binkoski, Director of Investigations
From: Kajal Chattopadhyay, General Counsel
Date: September 10, 2025
Subject: Petition for Regulatory Change – Drive-Thru Retail Sales
– FOR ACTION
Importance Level: Routine

PURPOSE: Pursuant to the regulatory petition SOP, Legal has reviewed a properly presented petition and recommends that the Executive Director direct the formation of a Working Group including relevant departments to review the petition and develop an initial recommendation to you that can be presented to the Commissioners for their consideration and vote at a future public meeting.

REQUEST ACTION BY: September 24, 2025

BACKGROUND: On September 18, 2024, Jennifer L. Flanagan of Vicente LLP submitted the attached petition on behalf of Ironstone Express, Inc. (Petitioners). See “935 CMR 500.110(11) Proposal Stebbins” attached hereto as Tab A. An evaluation of the new regulation proposed in the petition would require a broad impact analysis of the following current regulatory provisions:

935 Code of Mass. Regs. (“CMR”) 500.110 Security Requirements for Marijuana Establishments

935 CMR 501.110 Security Requirements for Medical Marijuana Treatment Centers

935 CMR 500.140 Additional Operational Requirements for Retail Sale

935 CMR 501.140 Additional Operational Requirements for Patient Sales



Petitioners refer to 935 CMR 500.140(9) and 501.140(9) Advance Contactless Order Fulfillment, which allows for curbside pickup in the fulfillment of product orders, in support of their petition requesting that the regulations should also allow for permanent drive-thru sales.

Legal believes that if, as Petitioners suggest, secure drive-through order fulfillment can be regulated to comply with all current applicable regulations in 935 CMR 500.110 and 501.110, and in 935 CMR 500.140 and 501.140, the adoption of Petitioner's new proposed 935 CMR 500.110(11), "Security Requirements for Marijuana Retailers with Vehicle Drive-Through Order Fulfillment" to allow for permanent drive-thru sales, will allow operators an opportunity to provide products to consumers who may not want to be in person but can utilize their vehicles to pick up products.

In any event, the adoption of this proposed regulation requires an analysis of the impact that such proposed regulation would have on the current 935 CMR 500.110 and 501.110, and 935 CMR 500.140 and 501.140, and would also involve a policy decision that would require a Commission vote. For these reasons, Legal recommends that you direct staff to form a Working Group to review the new proposed regulatory section so that we can make an initial recommendation to you, which you can present to the Commission for their consideration at a future public meeting.

RECOMMENDATION:

Per the approved regulatory petition review SOP, Legal recommend that you direct the formation of a Working Group and coordinate with the relevant departments to review the petition and develop an initial recommendation to you that you can present to the Commissioners for their consideration and vote at a future public meeting.

Attachments:

Tab A – Petition

EXECUTIVE DIRECTOR DECISION:

☒ Approve TJA 9.19.25 - the ED approves the recommendation to establish a Working Group, but will note for the legal and I&E departments that would make up said Working Group, that the Board is currently reviewing the petition process, and should a process change be implemented, this approval may be impacted

☐ Disapprove

☐ Edit and resubmit

☐ Need more information _____



Proposed Process for “Petition for Changes to Regulations”

1. Transition online form to include all documents and/or information required under 500.830 and submitted using “Petitions” mailbox
2. All petitions routed to Legal for review to ensure petitions are in compliance with 500.830 and existing statute. Petitioner receives acknowledgement of receipt and reference to “Petitions” mailbox if petitioner wants to provide additional information or seek updates (notice to Commissioners on BCC that petition has been received is under review)
3. Any petition found to be compliant with 500.830 and existing statute are brought to the Executive Director with an Executive Summary
4. Executive Director brings petition to Chair to consider compliant petitions on a Public Meeting agenda, at which point petitions are provided to all Commissioners as background information in Public Meeting packet
5. After Public Meeting discussion, Commissioners may (1) return compliant petition to Executive Director for additional information or further staff review, (2) approve for consideration in future regulatory round, or (3) dismiss the petition at the will of the Commissioners



Petition Review Process

Petition Process

- Petition received at Petitions@cccmass.com
- GC or their delegee acknowledges receipt and conducts a review to determine if the Petition conforms to the requirements of 935 CMR 500.830: Petitions for the Adoption, Amendment or Repeal of Regulations or 935 CMR 501.830: Petitions for the Adoption, Amendment or Repeal of Regulations.
- GC or their delegee informs petitioner if their submission does not conform to the regulatory requirements and works with the petitioner to conform the Petition to the requirements of the regulations.
- GC or their delegee conducts the initial legal analysis in order to make a recommendation to the Executive Director.



Internal Petition Process (Continued)

- GC makes one of the following recommendations to the Executive Director:
 - No regulatory change is needed;
 - Determination that there is a need for additional investigation or information (e.g., formation of a working group);
 - Determination that regulatory change is warranted and a recommendation should be presented to the Commission; or
 - Take any other action consistent with the regulations
- Upon receipt of feedback and direction from the Executive Director, GC takes appropriate action including working with Department Heads to implement the recommendation and to respond further to the petitioner, which could include, but not be limited to, the presentation of materials to the Commissioners for their consideration.



Petitions Summary (2020 – Current)

935 CMR §§ 500.830 and 501.830

SEP Status	Topic	Status
DBE	Testing	Denied
Non-SEP	Tier expansion	Denied
SEP	Third-party Technology Platform Providers	Denied
Non-SEP	ME Agent licensure	Recommended for further review
Non-SEP	Microbusiness	Denied
SEP	Two-driver rule	Approved
Non-SEP	RVT	Tabled due to Ch. 180 and resource allocation
Non-licensee	Interstate commerce, delivery and vertical integration	Approved in part
Non-licensee	Hemp	Denied
Non-SEP	Remediation	Denied
Non-SEP	Pediatric nurse practitioners	Approved in part
Co-signed by six SEP participants and two EEAs	Delivery	Approved in part
Non-SEP	Drive-thrus	Provided to ED for review
SEP	Quality Control Sample Limits	Provided to ED for review; ED review completed



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

Re: Petition for Adoption of New Regulations Allowing Drive-Through Order Fulfillment
Retail Operations

Dear Commissioner Stebbins,

On behalf of Ironstone Express, Inc., and pursuant to M.G.L. c. 30A, § 4, 935 CMR 500.830 and 935 CMR 501.830, please accept this submission as a formal petition for the adoption of new and/or amended regulations permitting licensed Marijuana Retailers in the Commonwealth of Massachusetts to conduct retail sales via secure drive-throughs.

Ironstone Express, Inc. d/b/a Green N Go (“Green N’ Go”) is a licensed Marijuana Retailer (#MR282424) operating at 454 Quaker Highway in Uxbridge MA. The structure that currently houses the cannabis dispensary was formerly utilized as an automatic car wash business. Green N’ Go is eager to take advantage of the building design to offer drive-through retail operations for Consumers to purchase cannabis and cannabis in a convenient, accessible, safe, and secure manner without having to leave the comfort and privacy of their own motor vehicles.

As the Cannabis Control Commission (the “Commission”) is well aware, Marijuana Retailers, and especially many Social Equity and small, locally owned businesses, are under extreme financial pressure. Increased competition among Retailers, plummeting product prices, the burden of Internal Revenue Code § 280E (which falls especially hard on Retailers), the extreme expense of Class A retail property, and the inequities that persist at the municipal level in securing Host Community Agreements have combined to force a great many Retailers into dire straits and insolvency.

Unfortunately, because of the barriers to entry discussed above, many of these Social Equity and small, locally owned Retailers are not located in major commercial areas, which further depresses revenue. One of the lone advantages they have is that they are often located in rural or ex-urban areas, and their sites are better equipped for secure vehicle order fulfillment using drive-throughs.

Additionally, many Consumers have physical disabilities that impact their mobility and/or serious medical conditions such as immunodeficiencies. These conditions make it difficult for a Consumer to physically enter a retail facility on foot and present major health risks arising from exposure to other individuals with contagious infections and diseases. The health and safety of these Consumers and the general public would greatly benefit from order fulfillment in a secure, enclosed drive-through area.

In 2021, the Commission promulgated 935 CMR 500.140(9) and 935 CMR 501.140(9), which authorizes advanced contactless order fulfillment operations for Marijuana Retailers and Medical Marijuana Treatment Centers (“MTCs”). By adopting regulations that allow for

contactless order fulfillment, the Commission has recognized that many Consumers have a need for different methods of order fulfillment to accommodate those with mobility restrictions and serious medical conditions.

These same Consumers also are actively advocating for an enclosed, vehicle drive-through method of order fulfillment to best address their health vulnerabilities and disabilities.

Numerous other states with regulated cannabis programs have allowed licensed retail cannabis businesses to utilize drive-throughs for order fulfillment. Despite no explicit mention of drive-through dispensaries in their applicable statutes, both New York and New Jersey have recently allowed for the licensing of these dispensaries. Colorado also allows consumers to purchase cannabis products using drive-throughs at licensed cannabis dispensaries. These states have recognized that vehicle drive-through order fulfillment is no less safe than contactless or in-person order fulfillment. These states have allowed populations who may experience physical difficulties or are otherwise unable to utilize in-person or contactless fulfillment, to still access high-quality, tested and regulated cannabis products.

Below for the Commission's consideration is proposed regulatory language that allows for vehicle drive-through order fulfillment. As shown in the proposed regulation below, secure drive-through order fulfillment can be regulated to comply with all current applicable regulations, including requirements for video camera coverage set forth in 935 CMR 500.110(5)(a)(4) and for dispensing only occurring in an "enclosed area."

Upon request, we can provide visual representations of the proposed vehicle order fulfillment process to demonstrate full compliance with our proposed regulations.

For these reasons, we respectfully request that the Cannabis Control Commission adopt the proposed regulations as set forth in this petition.

I am happy to meet to discuss this petition at your convenience. Please let me know if you have any questions or require additional information.

Best regards,



Jennifer L. Flanagan
Authorized Representative of Ironstone Express, Inc.

Vicente LLP
800 Boylston Street
26th Floor Boston, MA 02199
P: 857-315-7366
E : J.Flanagan@VicenteLLP.com

Proposed NEW 935 CMR 500.110(11):

(11) Security Requirements for Marijuana Retailers with Vehicle Drive-Through Order Fulfillment.

(a) A Marijuana Retailer may fulfill orders placed in advance or in real-time to a Consumer located in a motor vehicle on the Premises of the Marijuana Retailer if the Marijuana Retailer complies with the following requirements:

1. There shall be a clearly marked vehicle drive-through lane on the Premises;
2. Entry to the vehicle drive-through lane shall be controlled by a barrier gate utilizing a motorized bar or similar mechanized barrier enabling the Marijuana Retailer to control entry. The barrier gate shall remain locked and alarmed at all times except for the limited purpose of admitting a vehicle to the vehicle drive-through lane in accordance with 935 CMR 500.110(11);
3. Order fulfillment shall occur in an enclosed area in which a Marijuana Establishment Agent located in a Limited Access Area in the interior of the Marijuana Retailer's building uses a pass-through window no larger than 15 inches wide and 10 inches tall to accept payment and provide the order to the Consumer. No Marijuana or Marijuana Products may be located or stored in any location other than a Limited Access Area for the purpose of vehicle drive-through order fulfillment;
4. The Premises, including the barrier gate, the vehicle drive-through lane, and the enclosed drive-through area for order fulfillment shall be sufficiently lit to facilitate video surveillance;
5. The barrier gate shall be equipped with an alarm that detects unauthorized entry in accordance with the applicable requirements of 935 CMR 500.110(5);
6. The Marijuana Retailer shall adopt adequate security measures in compliance with 935 CMR 500.110(5)(a)(4) for the video surveillance of all areas that may contain Marijuana or vaults or safes for the purpose of securing cash, at all points of entry and exit to the Premises, including at the barrier gate, the vehicle drive-through lane, the enclosed drive-through area for order fulfillment, and in any parking lot, which shall be appropriate for the normal lighting conditions of the area under surveillance. Video cameras shall be directed at the barrier gate, the vehicle drive-through lane, and the enclosed drive-through area for order fulfillment. Cameras shall be angled so as to allow for the capture of clear and certain identification of any vehicle approaching the barrier gate, all Persons within the vehicle, and any vehicle exiting the enclosed drive-through area.
7. The Marijuana Retailer shall adopt security measures in compliance with 935 CMR 500.110(1)(a), 935 CMR 500.140(2) and M.G.L. c. 94G, § 4(c)(3) for the positive identification of individuals seeking access to the Premises, including the following additional security measures:

- A. The barrier gate to the vehicle drive-through lane shall be staffed with at least one Marijuana Establishment Agent during all hours of operation;
- B. The Marijuana Establishment Agent shall order any vehicle approaching the barrier gate to roll down all of the vehicle's windows and inspect the vehicle;
- C. Prior to allowing a vehicle to pass through the barrier gate, the Marijuana Establishment Agent shall inspect the proof of identification of all occupants of the vehicle and determine each individual's age. If the Marijuana Establishment is not able to verify that all occupants of the vehicle are 21 years of age or older, the vehicle shall be denied entry through the barrier gate and directed to leave the Premises immediately;
- D. Prior to completing any transaction in the enclosed drive-through area by means of the pass-through window, a Marijuana Establishment Agent shall inspect the vehicle driver's proof of identification and verify that the individual is 21 years of age or older.
- E. A Marijuana Establishment Agent shall refuse to sell marijuana or marijuana products to a Consumer located in the vehicle if, in the opinion of the Marijuana Establishment Agent based on the information available to the agent at that time, the Consumer or the public would be placed at risk. T

(b) The Marijuana Retailer shall have and follow a written operating procedure for vehicle drive-through order fulfillment which shall be submitted to the Commission prior to commencing drive-through order fulfillment operations and shall comply in full with 935 CMR 500.110(11). The Marijuana Retailer shall also submit the written operating procedures for vehicle drive-through order fulfillment to the local police and fire departments within the municipality where the Marijuana Retailer is sited.

(c) The requirements of 935 CMR 500.140(14) shall not apply to a CMO's vehicle drive-through order fulfillment operations that comply with 935 CMR 500.110(11).



Annual Report

FY2025



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MISSION STATEMENT

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

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

COMMISSIONERS AND EXECUTIVE DIRECTOR



Bruce Stebbins (Acting Chair)
September 2020 – Current
Joint Appointment – Governor, Attorney General, Treasurer Regulated Industry



Nurys Camargo
January 2021 – May 2025
Joint Appointment – Governor, Attorney General, Treasurer Social Justice



Ava Callender Concepcion
January 2021 – Current
Appointed by the Attorney General Public Safety



Kimberly Roy
January 2021 – Current
Appointed by the Governor Public Health



Travis Ahern
March 2025 – Current
Executive Director

FY25 BY THE NUMBERS



\$265M

Sales and Excise Tax



\$20M

Non-Tax Revenue



46

Public Meetings



814

Compliant Host Community Agreements



1,404

On-Site Inspections



30,000

Constituent Phone Calls

The Industry to Date



\$8B

Gross Cannabis Sales



93

Operational Medical Treatment Centers



82,407

Certified Active Patients



14,524

Unique Registered Agents



1,101

Social Equity Program Participants



77

Social Equity Program Training Courses



INTRODUCTION

Within the rapidly shifting landscape of the Commonwealth's licensed cannabis industry, the Cannabis Control Commission (Commission) remains committed to providing responsible oversight, comprehensive regulation, and a policy framework that prioritizes public health, safety, equity, and sustainability. This past fiscal year was pivotal to the agency's development, with the finalization of the Commission's first formal governance charter and significant changes to the agency's structure. The Commission also approved policies to advance equity and support delivery businesses, improve lab testing standards, and simplify licensing processes, all while increasing accountability and transparency. On June 30, the Commonwealth's adult-use market [surpassed \\$8 billion in total gross sales](#) which is a testament to the continued maturation of the legal cannabis marketplace in Massachusetts.

During this period, Executive Director Travis Ahern was hired following a nationwide search process and started his work as the agency's administrative head in March. The Executive Director Search Subcommittee, composed of then-Acting Executive Director/Chief People Officer Debra Hilton-Creek, Acting Chair Bruce Stebbins, Commissioner Ava Callender Concepcion, and cross-functional staff, led the recruitment and onboarding of the agency's new Executive Director. Ahern, who has an extensive background in municipal finance and public administration, brings a depth of experience in government operations and budget management. Upon joining the agency, Executive Director Ahern has worked closely with Commissioners and staff to establish clear goals to continue the Commission's momentum on policy reform and implementation, strengthen internal operations, and bring closure to several longstanding projects, many of which are outlined in this report.

In May, Commissioner Nurys Camargo stepped down from her role as the agency's social justice appointee. At the time of this publication, the agency's business continues to be conducted with three sitting Commissioners out of the five identified in statute, all of whom were appointed in 2021: Commissioner Concepcion, who serves in the Commission's public safety seat; Commissioner Kimberly Roy, who serves in the Commission's public health seat; and Acting Chair Stebbins, who serves in the Commission's regulated industry seat and was appointed for a second, five-year term starting Sept. 1, 2025 by the [Governor, Treasurer, and Attorney General](#). The Commissioners, each appointed in accordance with G.L. c. 10, § 76, are charged with setting policy, voting on licensing decisions, and overseeing the agency's strategic direction.

Following two years of work on internal governance, the Commission finalized and adopted its [first charter](#). The document reflects a collective effort by Commissioners and staff to formalize agency decision-making processes, define responsibilities, and promote durable and standardized operations. This milestone comes as the result of long-term mediation, public deliberations, and consensus-building.

This year's annual report reflects both the progress, challenges, and achievements of the past fiscal year as well as the work still ahead to strengthen Massachusetts' cannabis industry. The Commission has continued to advance public health and safety, promote social equity, and support business vitality, all while refining policy, enhancing oversight, expanding public education, and facilitating

market access. Yet the Commission also recognizes that progress is still needed to meet the evolving needs of patients, caregivers, adult consumers, businesses, and communities. For multiple years, the Commission has operated under flat or reduced budget appropriations, limiting its ability to address priorities and invest in necessary IT updates at the pace and scale the industry requires. The Commission remains focused on supporting a fair, welcoming, and well-regulated cannabis market; however, with sufficient funding, the Commission could move beyond maintenance to deliver the critical updates and innovations necessary to meet the needs of stakeholders across the Commonwealth.



IMPLEMENTATION OF ADULT- AND MEDICAL-USE MARIJUANA PROGRAMS

Purpose

This report provides information on the implementation of the adult-use marijuana program, as well as the Medical Use of Marijuana Program. It covers activities during the 2025 fiscal year, with data current as of June 30, 2025, unless otherwise noted. This annual report fulfills the Commission's statutory obligation under G.L. c. 94G, § 4(h) and St. 2017, c. 55, § 31, providing the Legislature with a transparent account of the agency's operations, regulatory development, and public guidance initiatives.

Executing the Commission's Mission

Established in 2017, the Commission is responsible for implementing and administering Massachusetts' adult-use and medical cannabis laws pursuant to G.L. c. 94G, § 4, Chapter 369 of the Acts of 2012, and related statutes. The Commission's mission is to honor the will of Massachusetts voters by ensuring safe, equitable, and effective access to cannabis, regulating cultivation, manufacturing, testing, distribution, and sales while prioritizing public health, equity, product safety, and community safeguards. The agency is tasked with implementing and administering laws that govern the cultivation, manufacture, testing, distribution, and sale of cannabis in Massachusetts. These responsibilities include developing and enforcing regulations that prioritize public health, promote equity in the marketplace, ensure product safety and integrity, and safeguard communities.

Since publishing its first regulations in 2018, the Commission has amended its rules almost annually to reflect statutory changes, expand opportunities for licensees, and improve patient access. Notable actions include the 2018 assumption of oversight over the Medical Use of Marijuana Program from the Department of Public Health (DPH), the 2021 regulatory overhaul merging colocated operations rules into existing frameworks, the 2023 implementation of Chapter 180 of the Acts of 2022, and the 2024 regulatory amendments easing delivery restrictions and increasing access for patients. The Commission is currently revising its regulations again to incorporate new Social Consumption Establishment license types, changes to Transporter licenses, and updates to agent registration.

In addition to regulations, the Commission issues guidance documents to assist consumers, patients, licensees, applicants, and municipalities with understanding and complying with regulatory requirements. To date, the agency has issued 21 guidance documents and three protocols. These resources are available on the Commission's website at <https://masscannabiscontrol.com/public-documents/guidance-documents/>.

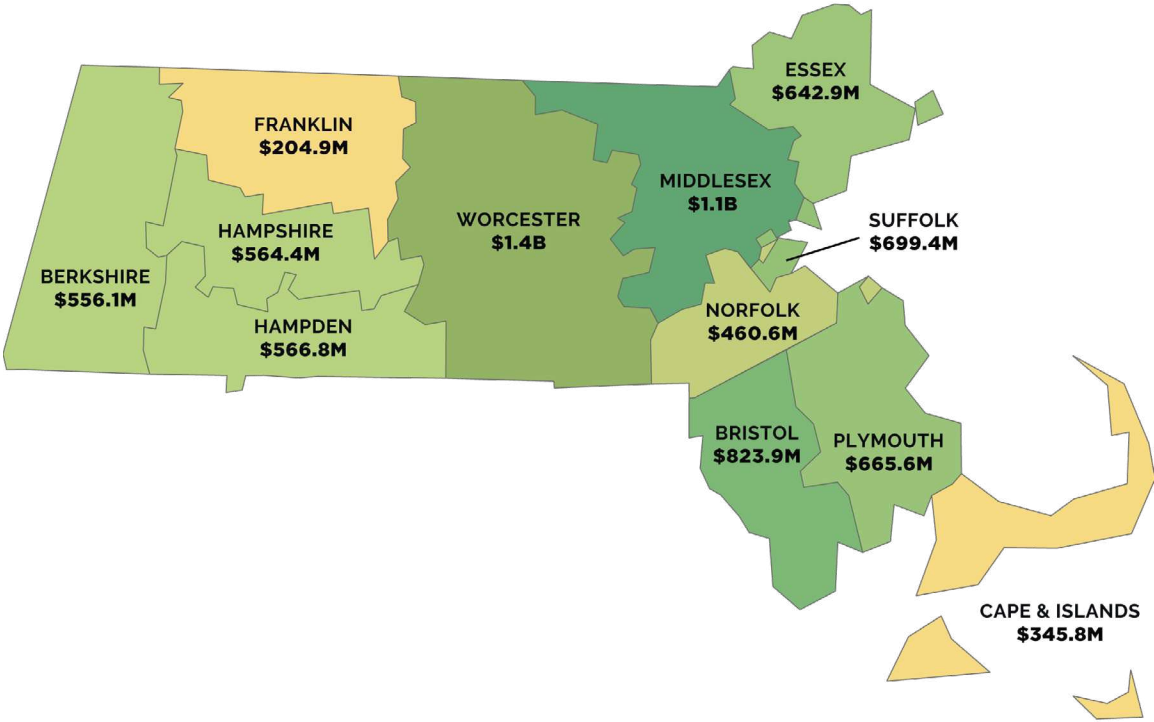
Revenue

The Commission is proud to have continued to operate on a cost-neutral basis. In fact, as this report shows, the Commission's activities have enabled annual increases in Commonwealth tax receipts. Revenue from application, licensing, fines, and other fees, along with adult-use marijuana sales and excise tax revenue, is deposited into the Marijuana Regulation Fund. In FY2025, the Commission collected \$20 million in non-tax revenue. The Massachusetts Department of Revenue reported a total of \$265 million in marijuana sales tax revenue and marijuana excise tax revenue collected as of May. Monthly gross sales continue to increase with record-breaking numbers in the early months of 2025.

This past fiscal year also witnessed remarkable adult-use cannabis sales achievements with May establishing a new record for a single month at \$142.3 million in gross sales. On June 30, adult-use cannabis revenue surpassed [\\$8 billion in gross sales](#) since the first two adult-use retail stores on the East Coast opened for business on November 20, 2018. The ongoing trajectory is expected to continue into the new fiscal year, even with the expansion of cannabis legalization in surrounding New England states.

These increases are expected to continue due to the highly anticipated Social Consumption Establishment license types becoming available, the change in regulation to allow delivery businesses and lab transportation to only require one agent per vehicle, and the increasing number of Marijuana Establishments obtaining licensure.

Gross Sales for Marijuana Establishments and Medical Marijuana Treatment Centers

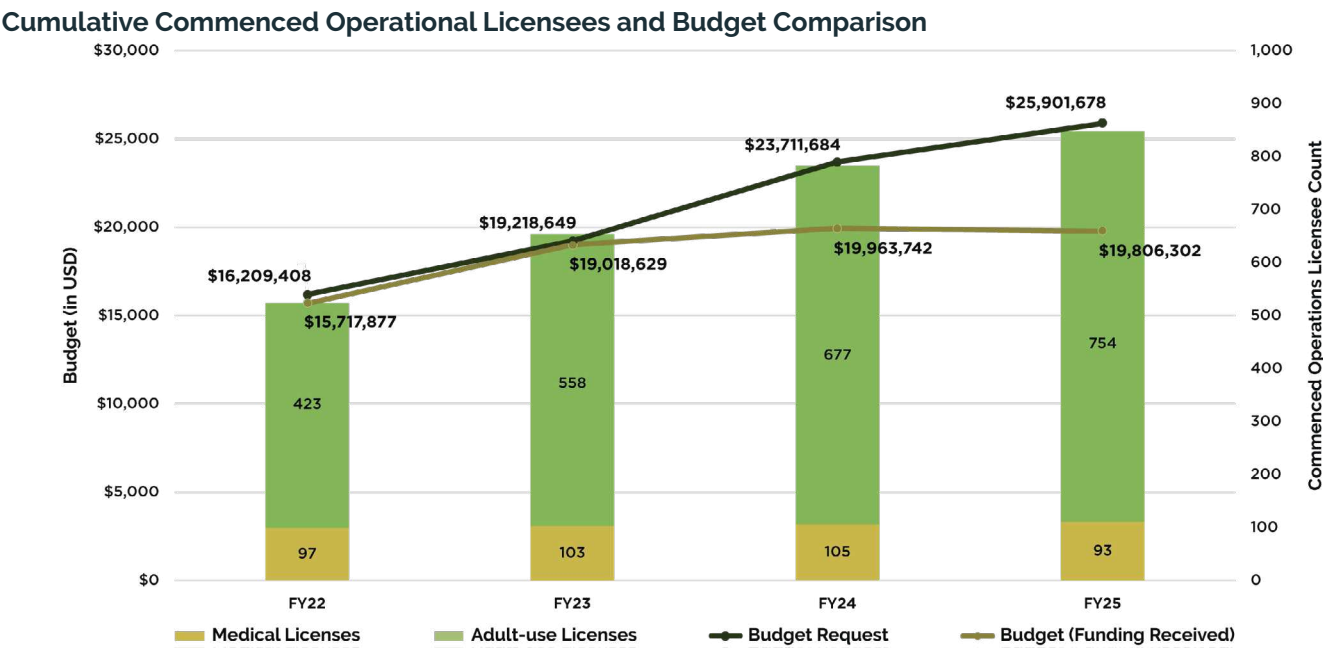


Finance

Despite generating substantial revenue for the Commonwealth, the Commission's appropriations have remained flat or been reduced, constraining its ability to reinvest in programs and infrastructure that sustain the industry's growth. Commission operations are funded through the Marijuana Regulation Fund, which is subject to appropriation and supports public health and safety needs, substance use disorder prevention, programming for restorative justice, jail diversion, workforce development, and the Cannabis Social Equity Trust Fund that is administered by the Executive Office of Economic Development (EOED), among other uses.

In FY2025, the Legislature appropriated \$20 million in total for the Commission: \$16.5 million for the Commission's Operations and \$3.5 million for the Medical Use of Marijuana Program. The Commission fully expensed both appropriations, continuing to grow, hire additional staff, and implement legislative mandates as the industry matured, all while generating surplus revenue for the Commonwealth.

For FY2026, the Legislature appropriated a total of \$19.7 million for the Commission: \$16.2 million for the Commission's Operations and \$3.5 million for the Medical Use of Marijuana Program. The amount appropriated was a reduction from the prior year, and less than the Commission's FY2026 request, which totaled \$30 million. The FY2026 funding request reflected essential needs, including the establishment of a Standards Laboratory to increase cannabis product testing and analytics, launch of a public awareness campaign for forthcoming social consumption, expanded training for Social Equity Program participants, and reinstating \$2.85 million in deferred costs from FY2025 and FY2024. These investments are critical to meet statutory deadlines, implement major revisions to regulations, and provide a much-needed investment in an IT infrastructure that no longer meets the needs of the Commission or the cannabis industry in 2026. While the Commission is taking cost savings measures in FY2026, these appropriations leave no margin for continuing existing programs, or to absorb the growing operational demands, making a supplemental budget request likely to meet current and ongoing public safety requirements and new statutory requirements.



Personnel

The Commission's Human Resources Department is responsible for creating and implementing policies, processes, and programs to support the Commission's mission, strategic vision, and efforts to create a great place to work. The Commission has a strong commitment to attracting, rewarding, developing, and retaining an inclusive, diverse, and talented workforce. At the time of this report, the Commission has filed 136 positions and has implemented a hiring freeze as the result of FY2026 budget shortfalls. Of the Commission's current employee population, 53% are female and 24% are persons of color. The agency's management team is 67% female and 39% persons of color. The agency has 2% of employees who chose not to specify their gender, and 20% did not specify their ethnicity.

This year, the Commission demonstrated its continued investment in professional development and internal mobility and advancement through 16 staff promotions across departments. Three key leadership roles were filled: Executive Director, Chief of Investigations and Enforcement, and General Counsel, in addition to several other key roles in departments across the Commission. The Commission's ability to recruit, retain, and expand its workforce is directly tied to the funding it receives. Staffing capacity has been further challenged by turnover during the past fiscal year, which has placed additional strain on existing personnel to meet operational and statutory demands. Without sufficient and consistent appropriations, the Commission's ability to maintain a stable, experienced workforce and deliver on its legislative mandates will be significantly constrained.

The Human Resources Department continued to support employee engagement and inclusion within a remote work environment through a range of initiatives to include the Commission's Diversity, Equity, Inclusion, Justice, and Belonging (DEIJB) initiatives. During this period, employee resource groups, DEIJB committees, monthly communications, resource sharing, and professional development opportunities were implemented and held.



Ongoing Regulatory Work

In FY2025, the Commission continued its practice of utilizing specialized working groups to evaluate and respond to emerging needs across the regulated cannabis industry. Subject-matter experts from multiple departments convene to conduct in-depth research, review and implement statutory changes, develop recommendations for regulatory revisions, and coordinate cross-agency initiatives. By leveraging diverse expertise, the Commission's working groups ensure that complex issues are identified and addressed in a comprehensive and timely manner. Several key areas of focus in FY2025 included the review of new legislation, the refinement of regulatory frameworks, and the advancement of projects requiring collaboration across the agency's operational, policy, and compliance divisions.

Social Consumption

The Social Consumption Regulatory Working Group continues its work through 2025. In December 2024, the Commission unveiled a proposed regulatory framework that establishes three new Social Consumption Establishment licenses and opened an informal public comment period to gather initial feedback. Commissioners then met in public session throughout Spring 2025 to further discuss the draft regulations and make additional changes. On July 29, Commissioners voted to approve draft regulations relating to Social Consumption Establishments, marking the beginning of the Secretary of the Commonwealth's formal promulgation process, including the required public comment period which will culminate in September. Following receipt and review of public comments, Commissioners will work with staff to finalize the regulations. Implementation of these new license types will depend on available funding and resources available to support the development of IT infrastructure for license applications, a public education campaign, continued roundtables with municipal leaders, operational updates, guidance documents, and inspections.



Delivery Exclusivity

In March, the Commission extended the existing delivery exclusivity period for an additional 12 months to April 2026 while committing to conduct further study to assess whether the goals of the exclusivity period have been met. Consistent with its statutory mandate and the Commission's mission to redress the historically unequal enforcement of cannabis laws against disadvantaged groups, these license types have been limited to equity participants for the first three years of their availability.

A Delivery Exclusivity Working Group was formed to prepare materials and a report on the exclusivity period's success. These efforts are led by the Legal Department and the Equity Programming and Community Outreach Department, in conjunction with other agency departments and the Donohue Institute at the University of Massachusetts. Following issuance of the working group's report, Commissioners will vote to decide whether an additional extension is required for "full participation" in Massachusetts' legal industry is to be achieved by stakeholders from communities that have been disproportionately harmed by previous marijuana prohibition. Delivery licenses may open up to general license applicants as soon as April 2026 if Commissioners decide the goal of full participation has been accomplished.

Access to Medical Cannabis

The Access to Medical Use Cannabis Working Group was established in May to conduct a comprehensive review of the Medical Use of Marijuana Program regulations under 935 CMR 501.000, with the goal of expanding patient access to Medical Marijuana Treatment Centers (MTCs) and medical-use cannabis. The Commission originally adopted a "lift and shift" regulatory model when inheriting the program from DPH in 2018, largely maintaining existing rules to preserve patient access and ensure operational continuity. However, feedback from stakeholders—including the 2024 Listening Session on the Islands, and most recently at the February Medical Program Listening Session—identified key areas for modernization. These include addressing the vertical integration requirement which obligates MTCs to cultivate, manufacture, and dispense cannabis to patients, thereby creating barriers to medical market entry and other potential operational updates such as transitioning from physical registration cards to electronic options to reduce costs. The Working Group may also explore on-site consumption in alignment with pending Social Consumption Establishment regulations.

The Working Group is developing proposed regulatory amendments that ensure the program's long-term viability while maintaining patient access and compliance with statutory mandates. Its work includes evaluating and revising provisions related to vertical integration, streamlining administrative processes, and identifying opportunities for efficiency that benefit patients, caregivers, Certifying Healthcare Providers, MTCs, and the Commission. The proposed changes will be reviewed by a designated Consultation Team including members within the Commission and on the Cannabis Advisory Board before final recommendations will be provided to the full Commission at a future public meeting. Bringing these regulation changes to fruition and implementing them effectively will be contingent upon available resources and funding.

Implementation of Chapter 180 of the Acts of 2022

On October 27, 2023, the Commission promulgated historic new adult and medical use of marijuana regulations in accordance with Chapter 180 of the Acts of 2022, *An Act Relative to Equity in the Cannabis Industry*. These reforms were reviewed by three individual working groups who provided recommendations on regulation changes, guidance and process development as well as identifying existing Commission materials that would need revisions and identified new forms or templates needing creation. Implementing the changes contained within these regulations has required significant cross-departmental work in addition to regular responsibilities.

As of June 25, staff have completed 244 of 283 identified deliverables and 1,420 of 1,481 checklist items, with remaining work largely depends on third-party vendors and IT infrastructure. Each deliverable undergoes extensive review to ensure new processes, guidance, and documents function effectively.

A major milestone was the publication of the [Model HCA](#), [Model HCA Waiver](#), [Host Community Agreement guidance](#) and [Municipal Guidance](#) documents to assist licensees and host communities with becoming compliant with the new regulations and law. Since March 1, 2024, the Commission has received 1,022 HCAs as part of the license application and renewal process including executed Model HCAs and HCA Waivers. In FY2025, the Commission reviewed 814 compliant HCAs including 263 compliant Model HCAs and 132 HCA Waivers. The Commission’s oversight of HCAs includes approving and certifying HCAs, voiding noncompliant provisions, and sanctioning or publicly identifying noncompliant municipalities.

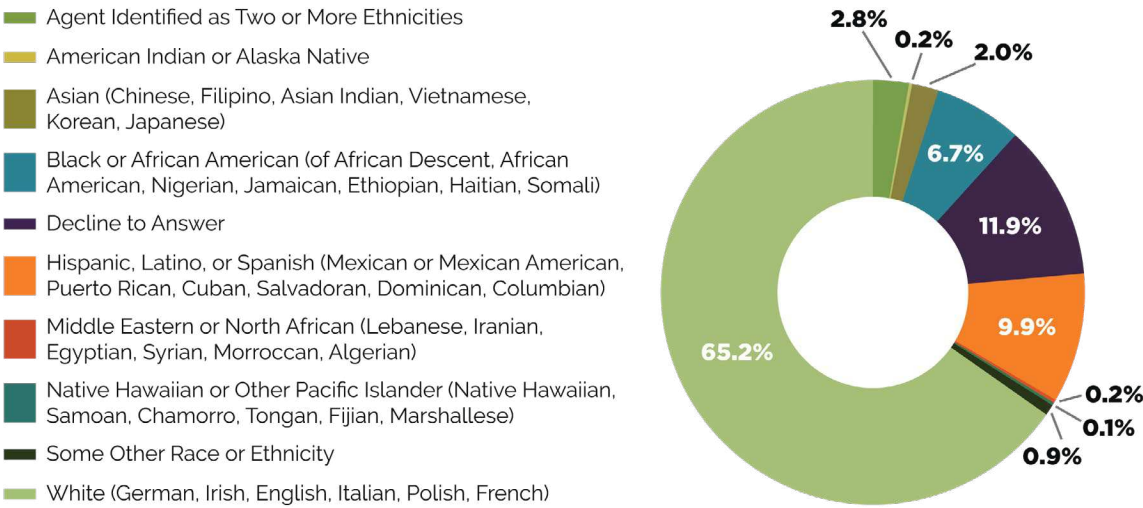
To further promote equity under the new law, the Commission published a Model Municipal Equity By-Law or Ordinance Template and related guidance to help host communities establish licensing policies that meaningfully include communities disproportionately harmed by prior marijuana prohibition and enforcement. The Commission is working in close partnership with its third-party vendors whose progress will be critical to finalizing all outstanding deliverables within this fiscal year.

Agents

As of July 2025, the Commission received 11,317 new applications for Marijuana Establishment (ME) agent registrations, creating a total of 21,280 agent cards and 14,524 unique individuals. Of the active agent cards, 36% (7,728) of the individuals identified as female, 62% (13,160) identified as male, 0.74% (157) identified by a different gender and 1% (235) declined to answer. The Commission has also received 2,077 new applications for Medical Marijuana Treatment Center (MTC) agent registrations, creating a total of 5,469 active agent cards for 1,885 individual agents. The active agent cards are comprised of 59% (3,400) individuals who identify as male, 37% (2,035) who identify as female and less than 0.62% (34) identify as “Other”.

The Commission is also considering amending the agent badging process as the industry has voiced concerns with the multiple badges required for an agent to work under colocated establishments. A proposed change is included in the social consumption regulations, but rollout and technical changes are subject to Commission resources, bandwidth, and available funding.

Race/Ethnicity of Active Agents FY25



Responsible Vendor Training (RVT)

Commission regulations 935 CMR 500.105(2)(b) and 935 CMR 501.105(2)(b) outline the RVT requirement for all current ME and MTC agents. The Licensing Department manages the RVT Program, including the application process, communication with applicants and current vendors, and any regulatory updates regarding RVT. To date, the Commission has approved 35 applicants, out of which eight applicants are Certified RVT Vendors of the Basic and Delivery Core Curriculum.

In 2023, the Commission unveiled new training curricula for cannabis business employees. These RVT curricula are designed to cater to both MTCs and adult-use MEs. The mandatory Basic Core Curriculum, already in place, covers essential topics such as product knowledge, responsible serving procedures, risk mitigation strategies, and public safety. An optional Advanced Core Curriculum is now available, enabling Agents to build on the knowledge, skills, and practices covered in the Basic Curriculum and specialize in areas such as cultivation, product manufacturing, social equity, and more. In addition to the Basic Core Curriculum, the Delivery Core Curriculum is required for all agents working under a delivery license type to ensure compliance with regulations and provides training on how to safely conduct deliveries, cash handling policies, strategies for de-escalating potentially dangerous situations, collecting and communicating information to assist in investigations, and more.

Additional courses will also be developed for social consumption establishment agents to ensure they are trained to monitor signs of over intoxication, follow safety protocols, and similar training to the TIPS program that bartenders receive in the Commonwealth. Creating the guidelines and requirements for these RVT courses will be subject to Commission resources and funding when the regulations are promulgated.

The Commission published [RVT Guidance](#) and [FAQ documents](#) to guide applicants through the RVT certification process as well as an updated [RVT Checklist](#) in the public documents section of the Commission's website.

Medical Use of Marijuana Program

The Commission has administered the Medical Use of Marijuana Program since the program transferred from DPH on December 24, 2018. As of June 30, the Medical Use of Marijuana Program has 82,407 Certified Patients, 6,240 Active Caregivers, and 473 Certifying Healthcare Providers (Certifying Physicians, Nurse Practitioners, and Physician Assistants). The Constituent Services team assists patients and caregivers with registration and renewal applications, troubleshooting technical issues, understanding allotments and where to access medication, and sharing other information regarding the Medical Use of Marijuana Program. The team also provides increased support to some of the Commonwealth's most marginalized constituents to ensure that their specific needs are met, including but not limited to, veterans, court-involved individuals, and senior citizens.

The Commission is committed to improving access to medical marijuana for patients and caregivers. In FY2025, the Commission moved to increase patient access to medical marijuana by revising regulations to allow patients to request a telehealth consultation with a Certifying Healthcare Provider for their initial certification on a permanent basis, following the COVID State of Emergency in Massachusetts. The Commission also revised its rules to allow for Certifying Healthcare Providers who are nurse practitioners with independent practices the authority to certify qualifying patients without a supervising physician. This change allows nurse practitioners registered with the Medical Use of Marijuana Program to have the same prescribing authority afforded by the Board of Registration in Nursing (BORN).

In February the Commission hosted a Medical Use of Marijuana Program listening session to gather feedback from patients, caregivers, providers, licensees, and all other interested constituents to hear and understand priorities for future regulatory amendments. In response to feedback received during the listening session, the Commission voted to include, among the Executive Director's goals for 2025, a comprehensive evaluation of the Medical Use of Marijuana Program. The objective is to develop recommendations that will promote the program's long-term viability and success. This work remains ongoing.

The Commission remains committed to ongoing outreach and information-sharing to support awareness and understanding of the Medical Use of Marijuana Program statewide. To meet constituents where they are, the Constituent Service team began offering in-person registration events to support extended patient and caregiver support for those in need at the agency's headquarters in Worcester. The Constituent Services team also partnered with DPH to develop a [guidance document for medical professionals](#) highlighting the benefits of the Medical Use of Marijuana Program.



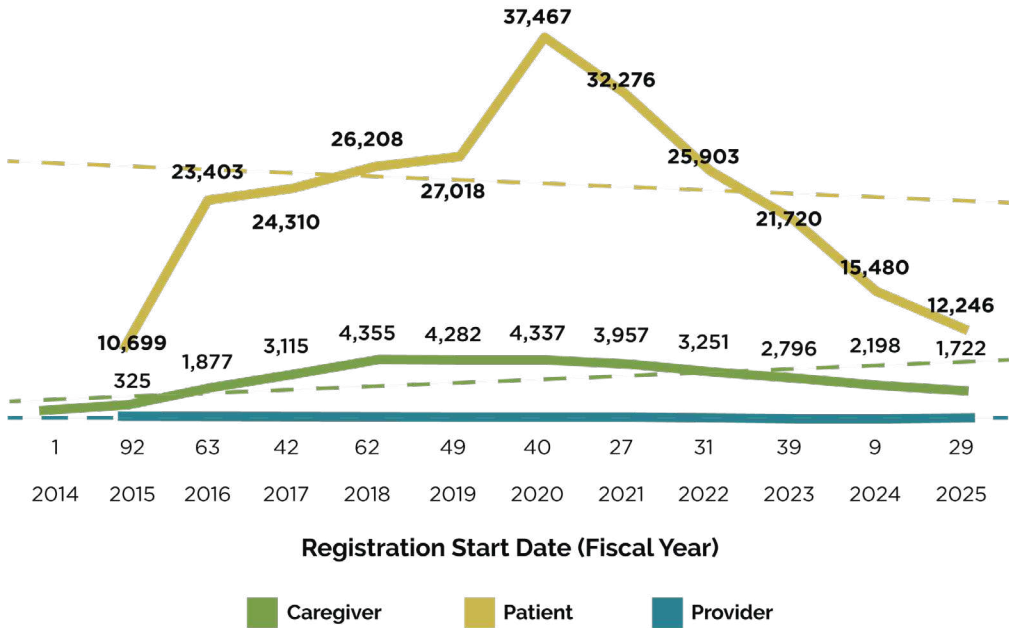
Table 1. Patient and Caregivers Applications

FY2025 Application Numbers	
Patient Registrations	12,250
Patient Renewals	70,157
Caregiver Registrations	1,722
Caregiver Renewals	4,518
Paper Applications Processed	193
Total	88,840

Medical Provisional and Final Licenses

As of July 1, Massachusetts' medical-use cannabis industry is comprised of the following: 93 vertically integrated MTC licensees that have commenced full operations to serve patients and caregivers, as well as two provisional licensees.

New Registrations Patients, Providers, and Caregivers by Fiscal Year (July 1 - June 30)



Licensing

The Commission's Licensing team oversees a broad range of regulatory processes critical to the operation and oversight of the Commonwealth's adult- and medical-use cannabis industries. From license application intake to final approval, the team ensures that all licensing activities align with the Commission's regulations and statutory mandates.

A core responsibility of the Licensing team is the review and processing of applications for new and renewal licenses, including those related to changes of ownership, name, location, and operational extensions. These applications include reviewing HCAs, ownership documents, lease or purchase agreements, standard operating procedures and more to ensure applicants are compliant with state law and regulations.

The Licensing team also manages the registration and renewal of ME and MTC Agent identification cards, RVT program certifications and renewals, supporting workforce compliance, public safety and training across both sectors of the industry.

In addition to application and compliance functions, the Licensing team provides direct support to applicants and licensees by responding to a high volume of inquiries received through the Commission's dedicated licensing inbox. The team also reviews and certifies Community Impact Fee requests submitted by municipalities—though no such requests were received during this reporting period.

Priority Applicants

Between April 17, 2018 and May 22, 2018, the Commission offered an application process for MTC priority and economic empowerment priority certification in accordance with state law. Under statute, MTC priority is an MTC previously approved by DPH when it administered the Medical Use of Marijuana Program and had at least obtained an MTC provisional license as of April 1, 2018. Economic empowerment priority required applicants to demonstrate three of [six possible criteria](#). In total, the Commission received 322 submitted applications and ultimately granted priority certification to 81 MTC applicants and 122 Economic Empowerment Priority Applicants (EEAs). As of July, the Commission has issued 34 commence operations approvals to EEAs.

Exclusive Licenses

The Commission's delivery license types, including Delivery Courier, Delivery Operator, and Microbusiness with Delivery Endorsements, are exclusively available to approved Social Equity Program (SEP) participants and EEAs. The initial exclusivity period began on April 1, 2022, when the first Marijuana Delivery Operator received their notice to commence operations in the Commonwealth and spanned 36 months. As of June 30, 2025, 231 businesses have been pre-certified as either a Delivery Courier, Delivery Operator, or Microbusiness with Delivery Endorsement. In March, the Commission extended the delivery exclusivity period for an additional 12 months to April 2026 while the [Delivery Exclusivity Working Group](#) conducts a further study to assess whether the goals of the exclusivity period have been met. The Commission will reconvene in Fy2026 to discuss whether to promulgate new regulations that would further extend the delivery exclusivity period.

The anticipated Social Consumption Establishment License types will also be exclusive to businesses with majority ownership comprised of approved SEP participants or EEAs, Microbusinesses, and Craft Marijuana Cooperatives for a set period of time. The goal of these exclusivity periods is to promote 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, by farmers, and

by businesses of all sizes. The roll out of these three new license classes under the Social Consumption license type is subject to appropriate resources and funding available to the Commission in order to create RVT guidance, licensee and municipality guidance materials, ability to complete inspections during consumption operation hours, and technical upgrades needed in the licensing system.

Provisional and Final Licensees

As of July, the Commission had received 1,889 license applications for adult-use MEs. At the time of this report, Commission staff are reviewing 26 adult-use license applications. The following is a summary breakdown of the 1,889 ME and MTC license applications fully submitted to the Commission as of July 2025:

- 260 MTC Priority Applicants;
- 144 EEAs;
- 740 Expedited Applicants;
 - These applicants consist of minority-, women-, and veteran-owned businesses as certified by the Supplier Diversity Office as well as Independent Testing Laboratories, Outdoor Cultivators, Marijuana Microbusinesses, and Craft Marijuana Cooperatives. SEP Participant Applicants also receive expedited review
- 394 SEP Applicants (as approved through the Commission's [Social Equity Program](#)); and
- 745 General Applicants which do not meet any of the aforementioned criteria.

As of July, 754 licensees have received notices from the Commission that authorize them to commence business operations in the Commonwealth, another 43 entities currently possess final licenses, and 474 have been approved for provisional licenses. Each year, the licensing team has authorized more businesses to commence operations and approved more final licenses than the previous year. So far this calendar year, more businesses have come online to commence operations than have closed.

Adult-Use Applicants by License Stage FY2025

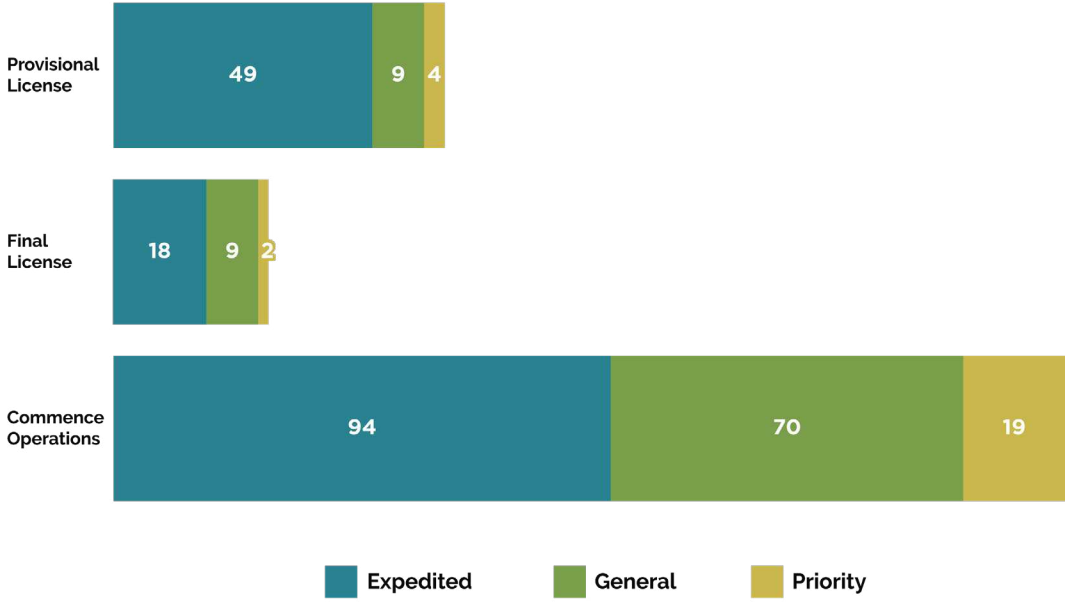


Table 2. Social Equity (SEP), Economic Empowerment (EE), Disadvantaged Business Enterprise (DBE)
Final Licenses FY2025

	SEP	EE	DBE	Total
Cultivation			8	8
Product Manufacturing	1	1	4	6
Retail	3	4	8	15
Delivery Operator	4	1		5
Delivery Courier	3			3
Delivery Courier Pre-Certification		2		2
Total:	11	8	20	39

Surrenders and Closures

Since 2018, of the 754 adult-use ME licenses the Commission has authorized to commence operations, 71 licenses, or 9.4%, have been either surrendered or not renewed by the Licensee. Those 71 do not necessarily represent total business closures. In some cases, licensees may hold multiple licenses, per Chapter 94G Section 16, but may choose to give up one or more while keeping the others active.

Adult-use Marijuana Retailers, which are the most sought-after license type, have seen even fewer closures. Since November 2018, the Commission has authorized 410 retail dispensaries to commence operations and open their doors to adult-use cannabis consumers in Massachusetts. Twenty-two retail licenses, or 5.4%, have either been surrendered or not renewed, leaving 388 active Marijuana Retailers in the Commonwealth.

Of the 112 MTCs the Commission has authorized to commence operations, 17 licenses or 15% have either closed down or expired. Of these 17 Licensees, 15 currently hold an adult-use retail license.

Changes of Ownership

Between July 2024 and July 2025, Enforcement staff has made approximately 45 recommendations for Change of Ownership applications before the Commission. Changes of Ownership applications reflect those businesses that are adding entities with control and/or ownership over the license, or applications to add new individuals with ownership interest over 10%.

Enforcement

The Commission is proud of the fair and comprehensive investigatory process it has developed and employed since the agency’s inception in 2017 to ensure licensees comply with state law and regulations. Massachusetts’ regulations are some of the strongest in the nation, and the agency stands by its policies and procedures that continue to build a safe, effective, and equitable industry.

Enforcement Referrals

Since July 2024, Investigations and Enforcement staff have made approximately 32 referrals to Enforcement Counsel to perform additional due diligence and review findings for possible administrative action pursuant to G.L. c. 30A, as well as 24 requests for counsel and advice. During this period, Investigations staff has completed approximately 1,404 total inspections, including unannounced inspections, license closure inspections, change of location inspections, structural change completion inspections, post-provisional license inspections, post-final license inspections, vehicle and vessel inspections, and audits. From these inspections, Investigations staff has issued approximately 917 notices of deficiencies to licensees. Investigations staff have also processed approximately 88 architectural review and structural change applications, and approximately 12 alternative security provisions.

Enforcement Actions

Since July 2024, the Commission, through its Enforcement Counsel staff, has initiated two enforcement actions in response to regulatory noncompliance. In both instances, the Commission summarily suspended establishment licenses to protect the public’s health, safety, or welfare. The subject of these actions include transferring ownership of a Marijuana Retailer license and failing to accurately report compliance testing results.

Additionally, over the past year, the Commission has resolved two enforcement actions via Final Order and Stipulated Agreements negotiated by Enforcement staff through Informal Dispute Resolution (IDR) conferences. In each instance, Enforcement staff secured affirmative relief in furtherance of the public interest and to ensure future regulatory compliance. These actions, combined, resulted in fine payments totaling \$165,000 which are deposited into the Marijuana Regulation Fund. All fines collected during this fiscal year were the result of a negotiation between the parties during IDR. In addition to these actions, the Commission has issued multiple notices to licensees to ensure continued compliance with previously ratified Final Orders and Stipulated Agreements.

Enforcement Counsel staff have also received 18 referrals to conduct suitability reviews. Since July 2024, these reviews have resulted in two informal proceedings before the Commission’s Suitability Review Committee. During that same time period, Enforcement Counsel staff also processed 36 requests to waive Commission regulations pursuant to 935 CMR 500.850 and 501.850.

Testing

During FY2025, the Commission’s Testing team continued its oversight of 11 Independent Testing Laboratories (ITLs) and two laboratory facilities in the Island Counties. The team, led by the Interim Director of Testing and the Laboratory Testing Manager, plays a critical role in protecting public health by ensuring that ITLs meet regulatory safety standards before and while testing cannabis products.

The Testing team provides analytical and technical expertise to support internal departments including Enforcement, Research, and Data. Their responsibilities include conducting unannounced inspections of ITLs, reviewing Standard Operating Procedures (SOPs), and resolving discrepancies within Metrc, the

Commonwealth’s seed-to-sale system of record. These inspections help ensure laboratory compliance with 935 CMR 500.160 and 501.160, including requirements for cannabinoid content, microbiological contaminants, heavy metals, residual solvents, and pesticide screening.

Throughout the fiscal year, the Testing team issued multiple laboratory bulletins to clarify testing protocols and address emerging concerns such as cannabinoid inflation, sampling methodology, and result reporting transparency. Notably, the Testing team worked in coordination with the Enforcement Department to investigate potential overstatements of THC potency, a growing concern among regulators nationwide.

During FY2025, the Testing team collaborated with the Enforcement Department on the drafting of two Administrative Orders regarding compliance testing submissions to one ITL and Certificate of Analysis (COA) upload requirements. Additionally, the Testing team continues to conduct an assessment of the Commission’s testing regulations and protocol for potential updates and revisions to evaluate and strengthen standardized testing and reporting practices.



Investigations and Enforcement (I&E) Task Force

In December 2024, the Commission, through its Investigations and Enforcement department, established a temporary task force comprised of members from the Testing, Investigations, Enforcement Counsel, and Project Management teams to support investigative efforts relative to ITL compliance. The task force is charged with reviewing and addressing complaints related to testing and safety of Marijuana and Marijuana Products marketed to Patients and Consumers, among other things.

Through the task force’s efforts this year, the Commission has worked to address constituent complaints by conducting retesting of Marijuana Products, which resulted in two public health and safety advisories alerting the public to potentially contaminated marijuana flower and pre-rolls. Additionally, investigative efforts of the task force directly led to the suspension of an ITL’s license.

The ability to continue the efforts of this task force is directly tied to the Commission’s available funding. While the task force achieved significant results this fiscal year, including multiple public health and safety advisories and the suspension of an ITL license, these accomplishments required substantial

cross departmental staffing, overtime commitments, and resource reallocation from other critical functions. Members of the task force perform this work in addition to their regular responsibilities, further straining available bandwidth and resources across the agency. The investigative and retesting work involved in responding to constituent complaints is resource intensive, requiring specialized expertise from multiple Commission teams as well as coordination with licensed testing laboratories. Without sufficient appropriations, the Commission may be unable to maintain this heightened level of investigative activity, slowing response times to complaints, reducing the scope of product safety testing, and limiting the agency’s ability to take swift enforcement actions. Additional funding would allow the Commission to continue proactive investigations, strengthen product safety oversight, and ensure consistent enforcement that protects both patients and consumers in the Commonwealth.

Equity Programming and Community Outreach

The Commission continues to advance its commitment to equity and community engagement by strengthening the nation’s first statewide SEP and expanding outreach through the EPCO department. These efforts reflect the Commission’s statutory mandate to promote equitable participation in the regulated cannabis industry and to ensure communities disproportionately impacted by marijuana prohibition are provided meaningful opportunities for economic advancement. Through expanded staffing, strategic planning, curriculum redevelopment, targeted outreach, and new platforms such as the EquityWorks Career Hub, the Commission works to reduce barriers to entry, foster professional growth, and build sustainable pathways into the legal cannabis marketplace. Collectively, these initiatives demonstrate the Commission’s dedication to building an inclusive, accessible, and forward-looking industry that prioritizes reparative practices and community impact including those from Disproportionately Impacted Areas (DIAs), the medical community, municipalities and government officials, academia, and other priority constituents.

Social Equity Program (SEP)

The SEP is designed to build a pathway into the legal cannabis industry for individuals disproportionately impacted by previous marijuana prohibition. The SEP focuses on those most impacted by the War on Drugs, marijuana prohibition, disproportionate arrest, and incarceration, and provides training, technical assistance, and mentorship for entry into the regulated marketplace across four areas: entrepreneurship, entry- and managerial-level workforce and professional development, and ancillary business support. Its overall mission is to decrease the disparities in life outcomes for impacted individuals and improve the quality of life for those from DIAs. Commission staff have initiated a three-year strategic planning process to ensure the SEP continues to effectively meet its intended goals.

Approved SEP Participants and EEAs are eligible for expedited application review within the Commission’s licensing queue when they submit a licensing application, receive certain fee waivers, and have exclusive access to Commission pre-certification and delivery and social consumption license types. The agency previously expanded SEP criteria and increased participation in the program to any individual listed as an owner on the original certification of an EEA who satisfies certain criteria.

SEP Program goals are to:

- Reduce barriers to entry in the regulated marijuana industry, regardless of desired specialty within the industry;
- Provide professional and technical services as well as mentoring for individuals and businesses facing systemic barriers; and
- Promote sustainable, socially and economically reparative practices in the regulated marijuana industry in Massachusetts.

To qualify for the program, an applicant must meet one of the following criteria:

- Residency in a DIA for at least five of the past 10 years and income not exceeding 400% of the Area Median Income in the applicant's respective town/city;
- A past drug conviction, continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Married to, or the child of, a person with a drug conviction, a continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Any individual listed as an owner on the original certification of an EEA who satisfies one or more the following criteria:
 - Lived for five of the preceding 10 years in a DIA, as determined by the Commission;
 - Experience in one or more previous positions where the primary population served were disproportionately impacted, or where primary responsibilities included economic education, resource provision or empowerment to disproportionately impacted individuals or communities;
 - Black, African American, Hispanic, or Latino descent; or
 - Other significant articulable demonstration of past experience in or business practices that promote economic empowerment in DIAs.

Since its inception, the Commission has accepted 1,101 participants into the free technical assistance and training program. Cohort III has been the largest class to date with 446 participants. To date, approximately 72% of all program participants self-identify as Black, African American, Hispanic, or Latino descent.

Utilizing feedback from SEP participants, EPCO collaborated with contracted technical assistance and training vendors to redevelop and deliver 77 updated courses. This comprehensive, strategic redevelopment ensures the SEP curriculum continuously evolves, remains industry-responsive, and effectively addresses emerging industry trends and participant needs.

With the current SEP application period open August 1 through September 30, EPCO has increased outreach efforts statewide. These efforts include proactive informational campaigns, detailed SEP application support webinars, and accessible guidance on eligibility criteria, application processes, and available participant resources. EPCO's continued outreach ensures equitable access, robust participation, and sustained benefit for communities disproportionately impacted by cannabis prohibition.

Advanced Courses

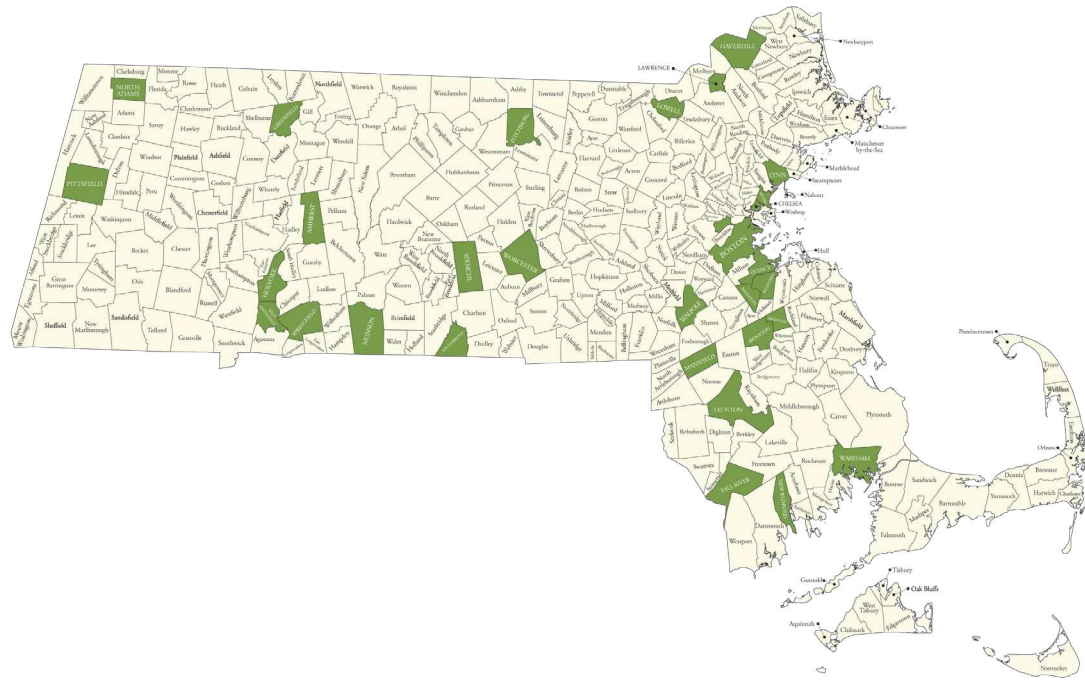
As the Commission continues to refine and expand its programming, ongoing feedback from participants highlighted the need for a more advanced and industry-responsive curriculum. In response, the Commission has collaborated closely with contracted technical assistance and training vendors to strategically redevelop and deliver 77 updated courses, ensuring the curriculum continuously evolves to align with the growing needs of the cannabis industry. This redevelopment is part of the Commission's ongoing commitment to equipping SEP participants with comprehensive and relevant resources to successfully enter and thrive within Massachusetts' cannabis industry.

The development and delivery of future social consumption courses within the SEP will require significant investment in time, expertise, and funding. These courses must be designed from the ground up, including curriculum development, creation of instructional materials, and recruitment of qualified instructors with subject matter expertise. Once created, the courses will be delivered in formats accessible to diverse participants, potentially requiring both in person and virtual offerings. The successful launch and ongoing availability of these courses are dependent on the Commission securing sufficient funding to support their design, implementation, and continuous improvement, ensuring that participants are fully prepared to enter and succeed in the emerging social consumption market.



Disproportionately Impacted Areas (DIAs)

Consistent with the statutory and regulatory mandate, please find below the Commission's map of DIAs, defined as a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of arrest, conviction, and incarceration related to marijuana crimes (see 935 CMR 500.002 and 501.002).



30 Communities of Disproportionate Impact				
Abington	Fall River	Lowell	Pittsfield	Springfield
Amherst	Fitchburg	Lynn	Quincy	Taunton
Boston	Greenfield	Mansfield	Randolph	Walpole
Braintree	Haverhill	Monson	Revere	Wareham
Brockton	Holyoke	New Bedford	Southbridge	West Springfield
Chelsea	Lawrence	North Adams	Spencer	Worcester

Engagement and Events

The Commission remains deeply committed to fostering robust and ongoing community engagement. Throughout this year, EPCO has significantly expanded outreach, actively promoting the Commission's equity programming, advancing critical initiatives, and strengthening community partnerships statewide. Over FY2025, EPCO held seven in-person events across the Commonwealth to increase accessibility for individuals seeking information on SEP, EOED's Cannabis Social Equity Trust Fund (CSETF), available licenses, municipal equity requirements and other resources. Due to budget constraints, these in-person events were limited and some prospective events were transitioned to a virtual format.

In October 2024, EPCO, in collaboration with EOED, conducted targeted outreach in Roxbury, providing essential application resources to potential applicants of the CSETF. The application period for the CSETF concluded on October 17, 2024. The Commission assisted with the awarding of grants to businesses by verifying equity status of the businesses selected as well as their license status to ensure they met the qualifying criteria set by the CSETF.

Additionally, EPCO participated in a panel discussion on February 11 at Johns Hopkins University that focused on equity in the cannabis industry. The event highlighted Massachusetts' leadership and shared best practices nationwide.

Overall, EPCO's outreach in FY2025 underscored the critical role that community engagement plays in advancing equity and expanding opportunities within the cannabis industry. The department's achievements this year, from targeted outreach to thought leadership, reflect the Commission's dedication to ensuring equitable participation statewide. However, maintaining this momentum, particularly through external events, specialized trainings, and new equity initiatives, will require additional funding to meet demand and fully realize the Commission's mission for an inclusive, accessible, and well-supported marketplace.

EquityWorks Career Hub

The EPCO team continues intensive work toward the successful development of the [EquityWorks Career Hub](#) platform, powered by Premier Virtual. EquityWorks is specifically designed to support professional growth in the regulated cannabis industry, including inclusive hiring practices and robust networking. The platform prioritizes communities disproportionately impacted by cannabis prohibition, fostering inclusive economic participation through tailored resources and networking opportunities. EquityWorks Career Hub was launched to licensees on April 14, equity programming participants on May 12, and to the general public on June 19.

EPCO successfully hosted a series of in-person training sessions on the EquityWorks platform on May 21, June 11, and June 25. These targeted outreach events focused on increasing awareness, driving platform registrations among SEP participants and job seekers, and strengthening engagement with licensed cannabis businesses and integrated business solution services. For a limited time prior to the public launch of the platform, the Commission targeted equity participants exclusively, which is vital for building community trust, encouraging early platform adoption, and guaranteeing access to digital resources among the equity participants and the public.

To spread awareness of this initiative, the Commission developed an integrated, multi-platform marketing campaign consisting of a [new webpage](#) added to the Equity Programming section of the Commission's website, an educational rack card, and a [video tour](#) as well as an email drip campaign, social media posts, and multimedia support to promote EquityWorks Career Hub and various training sessions held across the state for licensees, ancillary business owners, and job seekers of all levels.

Looking ahead, the Commission remains committed to strategically planning and organizing dynamic, robust community outreach events. These ongoing efforts are essential to supporting current and prospective equity participants, providing necessary resources, and continuously strengthening pathways into the legal cannabis industry, as business owners, skilled professionals, and integrated business solution providers.

Constituent Services

The Constituent Services Department serves as the forward-facing voice of the Commission to all residents of the Commonwealth; offering a multidimensional approach to support the general constituency of the Commission, as well as Medical Use of Marijuana Program participants. The Constituent Services

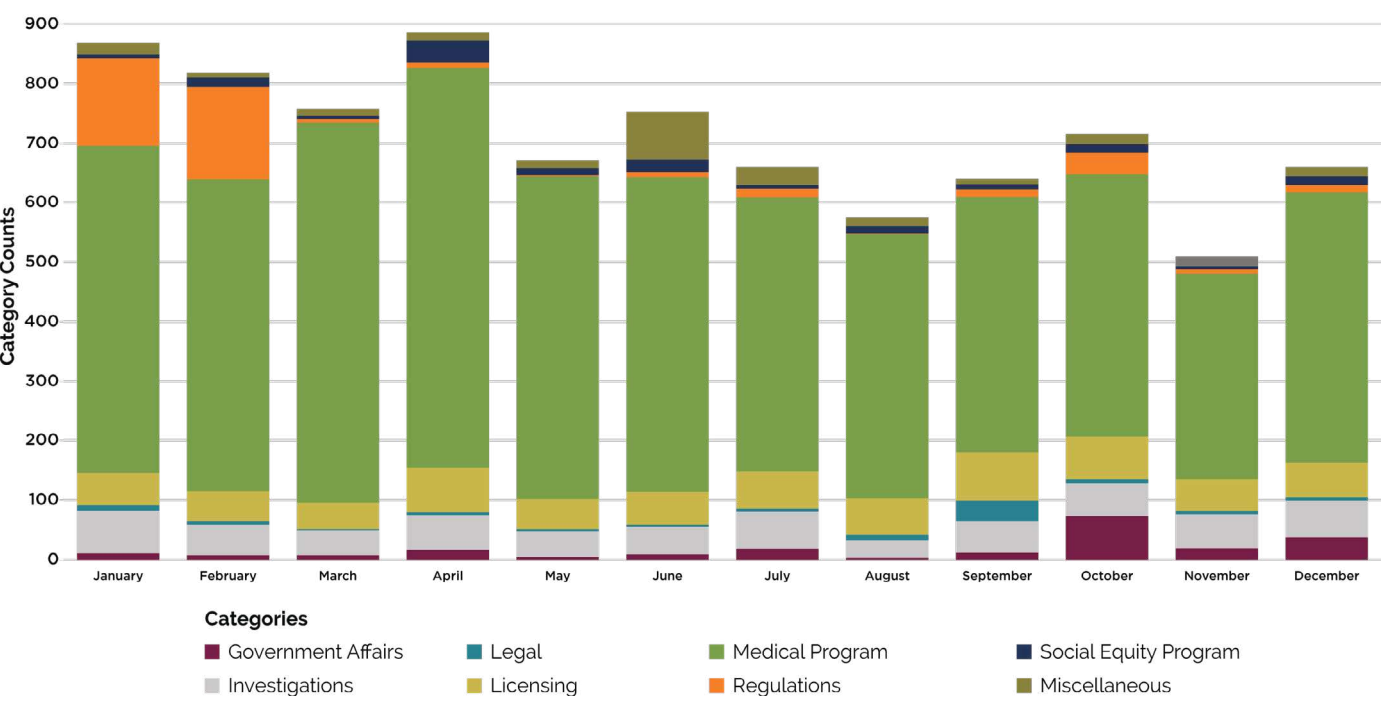
Department responds to inquiries from constituents and provides resources and information regarding the Commission's rules and regulations, sharing the work of each unit of the agency. The team also provides programmatic support for Registered Qualifying Patients and Personal Caregivers enrolled in the Medical Use of Marijuana Program.

The Commission ensures timely responses to all inquiries from the public. Constituents may contact the agency through the [MassCannabisControl.com "Contact" page](#), email, phone, or by writing the agency with their opinions, questions, comments, and concerns. In FY2025, the Commission received and responded to more than 30,000 phone calls and approximately 8,000 emails to its general email box. The Constituent Services team liaises with other departments to resolve constituent cases, including but not limited to questions about licenses and applications, compliance, ownership, suitability, and other matters related to operating businesses.

Table 3. Constituent Services and Operator Phone Lines from FY2025

FY2025	Calls Offered	Calls Handled	Average Handle Time	Average Time in Queue
Operator Inbound	6,542	7,096	03:45min	01:48min
Operator Outbound	589	589	00:19 sec	N/A
Patient Services Inbound	24,842	30,059	11:18min	03:19min
Patient Services Outbound	5,709	5,709	08:38min	N/A

Commission Mailbox Numbers FY2025



Communications

The Commission is in constant contact with members of the public through various media and platforms. Beyond the agency's monthly public meeting, which consistently features Commissioners' availability to the media after adjournment, Commissioners attend and present at public events throughout the Commonwealth, the Northeast, and nationwide. Commission principals have made or participated in numerous press opportunities, presentations, speeches, panel discussions, roundtables, and other forums before stakeholder groups such as community organizations, senior citizen groups, municipal officials, financial institutions, industry, peer regulators, and law enforcement. The agency takes its responsibility seriously to address questions raised by members of the press efficiently and transparently, and to proactively promote agency updates that will impact constituent groups through media announcements and opinion pieces, web updates, email communications, social media, and more.

Several examples from the past fiscal year and more recently include communications around regulatory reforms aimed at [increasing efficiencies for cannabis deliveries and the transport of marijuana products for testing, small business expansion, and patient access](#); the [approval of the final license for the Commonwealth's first Marijuana Research Facility](#); the rollout of the [framework for social consumption licenses](#); sales milestones such as [\\$8 billion in gross adult-use sales](#) and an [annual adult-use sales record with \\$1.64 billion generated in 2024](#); the [extension of the exclusivity period for delivery licenses](#) to be only available to equity participants; the [launch of the EquityWorks Career Hub](#); and the [launch of live programming for SEP participants](#).

Website

From July 1, 2024, through June 30, 2025, the Commission's website received more than 2,500,000 page views and over 635,000 unique visits. The website continues to provide a high level of transparency and self-service for the public by regularly maintaining various tables and tools such as the [Municipal Zoning Tracker](#), [RVT directory](#), and [Find a Retailer map](#). The Commission also maintains a robust archive of public documents, including enforcement actions, agency announcements, press releases, and both provisional and final Executive Summaries and License Applications, all easily accessible to the public. In FY2025, the Commission introduced several new website enhancements and user-focused resources designed to improve transparency, accessibility, and ease of navigation. The Commission launched new, curated resource webpages for the general public for better access to information related to [Chapter 180 implementation](#), [Hearings](#), the [EquityWorks Career Hub](#), and the Commission's [social media channels](#).

Google Programmable Search

The Commission launched Google Programmable Search on its web server, providing a combined, comprehensive search experience across both the Commission's main website (MassCannabisControl.com) and its public awareness More About Marijuana campaign website ([MoreAboutMJ.org](#)). With new advanced filtering options, users may now segment search results by content type (webpage, calendar event, document, or dataset) as well as posted date, relevance, and website domain.

Automated Licensing Tracker

The [Licensing Tracker](#) on the Commission’s website is now fully automated with data pulled directly from the Massachusetts Cannabis Industry Portal (MassCIP) and the Medical Use of Marijuana Program Online System (MMJOS), providing weekly updates of all Licensees who have been approved to commence operations. Additional advanced filtering options provide the ability to filter licensees by medical and adult-use, location, license type, and expedited or priority status as well as the ability to search and download the data in various file types. A one-click “Related Documents” search query, powered by the new Google Programmable Search solution, is also provided for each Licensee which displays all documents associated with a specific license number available on the Commission website such as Public Meeting agendas, Executive Summaries, License Applications, Changes of Ownership, and any enforcement actions.

Virtual Engagement

The Commission sent, on average, 10 email campaigns to subscribers per month with an open rate of 43%. The Commission’s social media presence includes [Instagram](#) (@CannabisControlCommission, 4,270 followers), [LinkedIn](#) (@CannabisControlCommission, 11,500) [Twitter, now called X](#), (@MA_Cannabis, 8,770 followers) and [Facebook](#) (@MassCCC, 3,200 followers). The Commission also hosts a [YouTube](#) channel that provides access to past public meetings, educational content, and tutorials. Through these various channels, the Commission continues to communicate with the public regarding the work of the agency and its regulation of the developing industry.

Public Awareness and Education Campaigns

Educating the public about safe, informed, and responsible cannabis use is a core responsibility of the Commission and an essential part of protecting public health and safety in the Commonwealth. Yet the future of these campaigns is limited, as the public education line item in the Commission’s budget has not been funded since FY2020. Without dedicated funding, the Commission has relied on organic promotion through owned and earned media strategies to sustain outreach, constraining the scale and reach of its efforts. While these initiatives have produced meaningful impact, continued and expanded campaigns, particularly those needed to support new license types such as social consumption, will require significant investment to ensure educational and accessible information is able to reach as many patients, consumers, and the general public as possible.

More About Marijuana

The Commission utilized organic promotion in FY2025 to highlight new and evergreen content for its state-mandated public awareness campaign, More About Marijuana ([MoreAboutMJ.org](#)). Although More About Marijuana was not funded for FY2025, Communications utilized its annual 4/20 campaign—a cannabis enthusiast holiday and the industry’s highest sales day of the year—as an opportunity to create and promote new digital content to better educate the public about labeling, cannabinoids, product types, and responsible use.

The latest resources include a new “[Understanding Labels](#)” animated video that delivers product labeling information from the previous year’s 4/20 campaign “Understanding Labels” flyer in a multimedia adaptation that is more popular and consumable online, and an “Understanding Cannabinoids” flyer that serves as an introduction to the most widely known and studied cannabinoids found listed on product labels by percentage.

The Commission also created and launched a new social media series based on its 2024 4/20 public awareness campaign “Marijuana Products” flyer to educate the public on the broad range of products available in Massachusetts as well as safe consumption and responsible use both in and out of home, and in consideration of ongoing policy discussions regarding social consumption business models, license types, and consumables.

Medical Use of Marijuana Program

In anticipation of the 10-year anniversary of the Medical Use of Marijuana Program sales in June, the Commission developed a series of rack cards providing an introduction to the program and its benefits to patients, how to register as a new patient and renew program registration annually, and the benefits of having a personal caregiver. These rack cards are available to licensees, Certifying Healthcare Providers, community organizations, and the general public to order free of charge via the [Massachusetts Health Promotion Clearinghouse](#) along with a large suite of public education materials in both print and digital download formats.



Government Affairs and Policy

Throughout FY2025, the Commission continued to serve as a trusted resource for policymakers at the local, state, and federal level, maintaining robust collaboration with the Massachusetts Legislature and Executive Branch to advance the Commonwealth's cannabis policy goals. Per the Commission's legislative outreach policy, the Commission does not weigh in on specific bills but rather, may advocate for general policies to support an industry that protects public safety, health, and welfare, and that promotes an equitable and fair marketplace. The Commission may also, by majority vote, approve policy statements to aid the Legislature on topics that fall under the agency's purview.

During the 194th legislative session, Commissioners and staff were actively engaged with members of the Legislature and the Joint Committee on Cannabis Policy to answer questions, provide data, and share background information on current regulatory practices. These ongoing discussions have ensured that legislators remain well-informed as they consider bills that may impact the cannabis industry and the Commission's work. Most often, legislative offices are in contact with the Commission on behalf of their constituents.

The Commission has regularly engaged with municipal officials, local boards of health, and police departments to provide data, expertise, and updates on regulatory developments including social consumption. The Commission also participated as a vendor at the Massachusetts Municipal Association (MMA) Annual Meeting and Trade Show in January. There, staff met directly with municipal leaders from across the Commonwealth, providing guidance and resources on key topics such as municipal equity requirements, community impact fees, and HCAs. These conversations helped local officials as they implement Chapter 180 mandates and helped align local practices with state policy.



Massachusetts is widely regarded as a national leader in marijuana policy, as evidenced by the volume of our publications and the frequent consultation requests from other states and federal agencies. The Commission voted in July 2024 to submit a [public comment](#) to the United States Department of Justice regarding the Drug Enforcement Administration's proposed rule to reschedule marijuana to Schedule III. The comment highlighted the Commonwealth's experience regulating cannabis safely while advancing public health and social justice. The Commission applauded the Administration's acceptance of cannabis as holding medicinal benefits to some patients, and shared questions and areas for our partners in federal government to consider. Following the public comment period, a hearing was scheduled and later postponed for the Department of Justice to hear further insights into rescheduling and called upon a member of the Commission's Cannabis Advisory Board to testify as well as another member to serve as an expert.

The Commission's Government Affairs and Policy team maintains strong relationships with regulatory counterparts in other states, meeting regularly through the Cannabis Regulators Association (CANNRA) to discuss topics such as hemp, public health, interstate coordination activities, compliance and enforcement, banking, public education, social equity, medical cannabis, and federal policy. These engagements have allowed the team to draw on the experiences of peer agencies nationwide, learning from other states' approaches and incorporating those insights into policy development in Massachusetts. By benchmarking against national best practices, the Commission continues to refine its regulations, improve market outcomes, and ensure that the Commonwealth remains a leader in safe, equitable, and effective cannabis governance.

Building on the success of prior years, the Commission hosted its third annual [State of Cannabis in Massachusetts](#) event at the State House in April, bringing together legislators and their staff for a comprehensive update on the agency's programs, market data, and policy initiatives. Commissioners and staff presented topics including social equity, HCA oversight, and market trends, and distributed updated informational materials summarizing the agency's work. This event also served as an opportunity for Legislators to meet the Commission's new Executive Director and hear directly from him about goals for the Commission's future.



Legal

The Legal Department advises the Commission and its staff on the interpretation and implementation of its governing laws and on applicable areas of state and federal law. In addition, Legal coordinates, as needed, on responding to external inquiries from members of the public and from federal and state agencies and officials, including agency counsel. Staff also supports professional groups and academic institutions focused on the developing area of cannabis law. In addition to the General Counsel, the Legal Department consists of a Deputy General Counsel, several Associate General Counsels, two Paralegals and one Legal Assistant.

Litigation

The Legal Department works closely with the Office of the Attorney General on litigation and other matters implicating the interpretation and implementation of the Commission's laws and regulations as well as pertinent areas of the law. To that end, the Commission's General Counsel has obtained designation as a Special Assistant Attorney General (SAAG) to represent the Commission in certain court matters. Pursuant to the SAAG designation, the General Counsel has filed pleadings in several pending Superior Court matters. As of the date of this report, the Commission is not a named defendant in any pending court litigation matters. Legal staff also monitor and alert Commissioners and staff to important decisions made by federal and state courts on relevant aspects of the law.

Open Meeting Law Compliance

The Commission conducts its public meetings in compliance with the Open Meeting Law, G. L. c. 30A, §§ 18-25, which includes posting notice and materials at least 48 hours in advance of its meetings. The Commission's public meetings are held in virtual and/or hybrid formats and, over the past few years, have been consistent with the Governor's executive orders related to the Open Meeting Law and the Legislature's enactment of Chapter 2 of the Acts of 2025. During FY2025, there were three complaints filed against the Commission relating to the Open Meeting Law. In two of those complaints, the Attorney General's Office ruled against the Commission, but found no evidence of an intentional violation in either case and did not impose a fine. As of the date of this report, the third complaint is still pending.

In addition to live streaming its public meetings, the Commission posts recordings of its public meetings on its YouTube channel and its minutes on its website. On a tri-annual basis, the Commission reviews its executive session minutes for release to the public. Relatedly, Legal staff also advises on compliance with Robert's Rules of Order, previously adopted by the Commission, and on questions relating to the conduct of its public meetings.

Ethics Compliance

As required by G. L. c. 10, § 76 (k), the Commission has developed its own Enhanced Code of Ethics. The Legal Department supports Commissioners and staff in ensuring compliance with state ethics laws and its enhanced code of ethics. As part of its onboarding process, Legal staff ensures that new employees satisfy applicable ethics requirements.

Public Record Compliance

During CY 2024, the Commission's Records Access Officer received and responded to approximately 216 requests for public records. When necessary, the Commission has withheld exempt records under G. L. c. 4, § 7 (26), in order to safeguard records considered to be confidential under its statutes and regulations and the Public Records Law. In January 2025, the Commission filed its annual report with the Secretary of the Commonwealth's Public Records Division. As needed, it consults with the division to ensure compliance. As of July 30, 2025, the Commission is not a party to any pending appeals concerning its response to public record requests.

The Commission's operating principles include a focus on conducting all processes openly and transparently. To that end, staff regularly post the following:

- Applications granted provisional and final licensure, which can be found on the [Licensing Application Decisions](#) section of the Public Documents page on the Commission's Website; and
- Executive summaries, public meeting minutes, and other materials presented during Commission public meetings, which can be found on the [Public Documents](#) page of the Commission's website.

The Legal Department also consults on the maintenance of the [Open Data Platform](#).

Audits

Through this past fiscal year, the State Auditor's Office chose to audit the Commission during the following timeframes:

- July 1, 2022-June 30, 2024, to examine the calculation, collecting, and accounting for fees and fines collected in the Marijuana Regulation Fund (MRF);
- July 1, 2019-December 31, 2024, to examine agency employee settlement agreements.

Additionally, the Auditor reviewed processes and procedures relative to host community agreements (HCAs), which are the required contracts between licensees and the cities and towns in which they operate, as well as related community impact fees (CIFs).

Commission staff met with the Auditor's team for nearly a year and spent hundreds of hours reviewing procedures with the investigators, then provided formal responses to initial findings before the State Auditor's final report was published in August.

In July 2024, the agency had self-identified that a number of administrative extensions had been requested by and granted to Massachusetts licensees without requiring payment of the applicable prorated fees. Once the failure to collect fees was discovered, the Commission began billing for uncollected fees that were identified. To date, the agency has collected more than two-thirds of identified fees and continues to pursue collection of the remaining balance through the State Comptroller Billing and Receivable System.

The Commission also updated its licensing software in July 2024 to accept pro-rated extension applications and fees. Fees are now paid prior to the Commission's granting of an extension, eliminating the need to bill licensees.

It is critically important to note that neither the Auditor nor the Office of the Inspector General, which completed [a similar review](#) in March, identified any evidence of fraud by Commission employees in their reports. The Commission's [April 17 response to the Inspector General](#) is available. The Commission welcomes ongoing collaboration with the Auditor's team and looks forward to providing updates over FY2026 as needed. More information is available within the agency's online [Frequently Asked Questions page](#) at MassCannabisControl.com.

Research

The Commission's Research Department currently consists of a Chief of Research, two Project Coordinators, and two Research Analysts. Despite continued limited staffing and funding, the Commission plans to develop the Center for Cannabis Research and Policy (CCRP) to advance collaboration for cannabis policy research.

Section 17(a) of G.L. c.94G and St. 2017, c.55 requires the Commission to develop a research agenda to better understand the social and economic trends of cannabis in the Commonwealth. The law identifies at least seven categories of study and authorizes an expansion of that scope with the aim of informing future decisions that would aid in the closure of the unregulated marketplace and monitoring the public health impacts of cannabis and cannabis legalization.

Since the Commission completed all one-time research items pursuant to St. 2017, c. 55 in 2022, it is focused on providing updates to metrics pursuant to Section 17(a) of G.L. c.94G. The Research Department publishes two standardized reports in alternating years: 1) Industry Report and the 2) International Cannabis Policy Study (ICPS) Report.

In February, the Research Department published the Commission's 13th comprehensive research report pursuant to G.L. c.94G § 17(a)(iii), G.L. c.94G § 17(a)(iv), and G.L. c.94G § 17(a)(v). This interdepartmental study provides a comprehensive assessment on the cannabis industry, including ownership and employment, diversity, equity and inclusion, among other topics of policy interest, such as testing, a recent public health concern nationwide. Additionally, the Department is currently drafting the next report, using data from the ICPS, for completion in 2026.

The Research Department continues to work internally, as well as collaborate with various state agencies, academic researchers, and other stakeholders to employ primary and secondary data collection methods to examine a spectrum of items. As cannabis policy research gains interest nationwide, the Commission set both long- and short-term goals to ensure its research is high-quality, impactful, comprehensive, and collaborative. Thus, in addition to the Industry Research Report, during FY2025, the Department has also published one peer-reviewed scientific article and gave nine presentations at national scientific conferences, academic institutions, and state government conferences to advance the study of effects on cannabis laws.

The Research Department served as Guest Editors for the first Specialty Update on Cannabis for the scientific journal *Clinical Therapeutics* in July of 2023. Due to the success of the first Specialty Update, members of the Research Department were requested to serve again as Guest Editors for a second full

issue of the scientific journal *Clinical Therapeutics*, focused on the intersection of cannabis research and policy, this time with a focus on medical programs and therapeutics, to be published in January 2026. In this Special Issue, the work of the Commission and colleagues will again highlight Massachusetts' cannabis research and policy to an international audience. Since this issue is Open-Access, all articles are available to anyone interested and continue Massachusetts' trajectory as a leader in applied cannabis research and evidence-based policy.

The Commission sponsored, moderated, and served as a panelist on two Symposiums, including a Plenary at the annual CANNRA External Stakeholder meeting in June: 1) *What is "medical cannabis" in the current market and how can we regulate for patient safety?* (Symposium, served as Moderator); and 2) *What do data and research tell us about the impacts of legalization?* (Plenary, served as Panelist). These two presentations included the leaders in cannabis research and policy across the U.S., including Dr. Susan Weiss at the Division of Extramural Research at the National Institute on Drug Abuse (NIDA); Dr. Ryan Vandrey, Professor at Johns Hopkins University Behavioral Pharmacology Research Unit and Principal Investigator on the NIDA Research Registry for the Study of Medicinal Cannabis Use and Health Study; Steph Sherer, Board President and Executive Director of Americans for Safe Access; Dr. David Hammond, Professor at University of Waterloo and Principal Investigator on the International Cannabis Policy Study (ICPS); Dr. Igor Grant, Distinguished Professor of the Department of Psychiatry at the University of California, San Diego School of Medicine and the University of California Center for Medicinal Cannabis Research (CMCR), Heather Krug, Regulatory Programs Branch Chief for the State Public Health Laboratory of the Colorado Department of Public Health and Environment, and Dr. Julie K. Johnson, Chief of Research at the Massachusetts Cannabis Control Commission.

The Research Department also coordinated a Symposium presented at the 2025 Annual Research Society on Marijuana (RSMj) conference entitled, *Ensuring Cannabis Policies aren't Half Baked: Pairing Policy with Science* and featuring CANNRA colleagues, including: Dr. Kaitlin Kosinski, Research Scientist at the New York State Office of Cannabis Management; Dr. Lirit Franks, Research Associate at the University of Utah School of Medicine, and Dr. Julie K. Johnson, Chief of Research at the Commission. This Symposium highlighted the intersection of cannabis research and regulation, as well as the unique Massachusetts experience of a cannabis regulatory governance body including an internal Research Department and the applied cannabis research pursuant to Section 17(a) of G.L. c.94G and St. 2017, c.55.

The Research Department continues to serve on external committees to expand national collaborative efforts. The Chief of Research serves as co-chair on the CANNRA Medical Cannabis Subcommittee working with other state regulators from across the country and is the Associate Editor for policy research for the scientific [journal, Cannabis](#). Research staff are also members and actively participate in the RSMj, Council of State and Territorial Epidemiologists (CSTE) Cannabis Subcommittee, and CANNRA Subcommittees, including hemp, public health and education, and federal policy.

Additionally, it has been a successful year for external grant collaborations to advance G.L. c.94G goals and Commission priorities. The Research Department has successfully contributed to three national grants, including: 1) *Impact of cannabis legalization and commercialization on substance use and mental health outcomes in psychosis*; 2) *Enhancing Opportunities for Addiction Research in the Merrimack Valley*; and 3) *State Cannabis Surveillance Environmental Scan*. Additionally, the Commission was scored high for a fourth grant entitled, *The Impact of Cannabis Legalization on Cannabis and Nicotine Vaping/Smoking*

among Youth with Mental Illness and anticipate this National Institutes of Health funded grant to be awarded to the Commission in FY2026. The Commission is working to secure an appropriation to receive monies from collaborative grants secured for critical cannabis research in Massachusetts and beyond.

Table 4. Commission Research Products from July 1, 2024 - June 30, 2025

Colby, A., Humiston, G, Johnson, JK. (2025, February). Review and Assessment of the Massachusetts Adult and Medical Use Cannabis Industries . Worcester, MA: Massachusetts Cannabis Control Commission.
Johnson JK. Gruber S., Pacula RL., Weiss S. Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2024. <i>Research Spotlight: New Findings on the Health Effects of Cannabis and Cannabinoids and Policy Implications</i> . Moderator.
Johnson JK, Colby A, Humiston G, Pensky H. <i>Using Publicly Available Cannabis Industry Surveillance Data to Monitor Social Equity Trends</i> . Research Society on Marijuana (RSMj) July 2024. Symposium Presentation.
Humiston G, Colby A, Edwards V, Johnson JK. <i>Guiding Applied Public Health Researchers through Cannabis Industry Testing Standards and Data</i> . Council of State and Territorial Epidemiologists (CSTE) June 2025. Oral Presentation.
Johnson JK., Fisher E., Grant I, Sherer S, Vaillencort D. Panel, <i>What is “medical cannabis” in the current market and how can we regulate for patient safety?</i> Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2025.Moderator.
Schauer G., Hammond D., Vandrey R., Weiss S., Krug, H., Johnson JK. <i>What do data and research tell us about the impacts of legalization</i> . Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2025. Plenary Panel-Panelist.
Invited Lecturer, Wake Forest University. Course, Research Methods, Professor Jeffrey Moyer [Lecturers: Chief of Research, Julie K. Johnson, and Research Analyst, Graelyn Humiston]
University of Massachusetts, Lowell. <i>Public Health Job Opportunities in State Government</i> . Professor Ann-Marie Matteucci. February 10, 2025. Invited Panelists: Julie Johnson, Cannabis Control Commission, Nicole D. Karlsson, New Hampshire Department of Health and Human Services, Amy Benison, Massachusetts Department of Public Health, and Andrew Robinson, Massachusetts Department of Public Health
Johns Hopkins Bloomberg School of Public Health, Course, <i>Public Health Perspectives on U.S. Drug Policy</i> . Professors Sabriya Linton and Fernanda Alonso Aranda. February 11, 2025. Invited Panelists: Julie K. Johnson and Silea Williams, Cannabis Control Commission, Kristen Davis-Franklin, Deputy Cannabis Regulation Oversight Officer, Illinois Department of Financial and Professional Regulation, Audrey Johnson, Executive Director, Maryland Office of Social Equity
Julie K. Johnson, <i>Research at the Massachusetts Cannabis Control Commission</i> . California Government Cannabis Research Workshop. March 24, 2025. Oral Presentation.

Table 5. Commission collaborative grants received from July 1, 2024 - June 30, 2025

Andy Hyatt, Harvard Medical School and Cambridge Health Alliance [Funded]	Title: Impact of cannabis legalization and commercialization on substance use and mental health outcomes in psychosis. Funding Agency: National Institutes of Health/ NIDA Role: Cannabis and Drug Policy Advisor
Dan Berlowitz, University of Massachusetts, Lowell [Funded]	Title: Enhancing Opportunities for Addiction Research in the Merrimack Valley Funding Agency: National Institutes of Health/ NIDA Role: Fellowship Site Mentor, Cannabis Control Commission
Gillian Schauer, Cannabis Regulators Association [Funded]	Title: CSTE State Cannabis Surveillance Environmental Scan Funding Agency: Council of State and Territorial Epidemiologists (CSTE) and Center for Disease Control (CDC) Role: Collaborator with CANNRA

CONCLUSION

This eighth annual report identifies the Commission's ongoing operations for FY2025 and documents the continued growth of the regulated medical- and adult-use cannabis industry in Massachusetts. Over the past year, the Commission has anticipated needs, created significant efficiencies, and continued to meet statutory requirements, while also promoting new opportunities for the cannabis marketplace. From expanding opportunities for delivery and small business, to supporting outdoor cultivation, enhancing testing, implementing legislative mandates, and creating three new license types, the Commission has advanced thoughtful reforms to strengthen the industry.

Across all departments, Commission staff have increased transparency and accessibility, launched new tools, expanded data dashboards, and maintained strong oversight to protect public health and ensure licensee accountability. The Testing team issued critical guidance to strengthen laboratory compliance and protect public health, while the Enforcement Division conducted complex investigations and field inspections to ensure licensee accountability. The Government Affairs and Policy team coordinated robust engagement with municipal leaders, law enforcement, legislators, and regulatory peers across the country, contributing subject-matter expertise to inform both state and national cannabis policy.

Looking ahead, energized by Acting Chair Stebbins' reappointment and the arrival of Executive Director Ahern, the Commission is eager to continue building on the progress achieved thus far in implementing

evidence-based policy and upholding the public’s trust. However, to meet the expectations of the Legislature, Massachusetts residents, and the industry, the agency requires sufficient funding to implement necessary regulatory updates, upgrade outdated IT infrastructure, and expand public education. The Commission’s work in FY2025 and plans for FY2026 reflect an ongoing effort to ensure Massachusetts remains a safe, equitable, and effective cannabis industry for all stakeholders. With more than \$8 billion in total sales to date, Massachusetts’ market serves as an economic driver and a national leader in responsible regulation, innovation, and prioritizing disproportionately harmed communities.



Memorandum

To: Commissioners
Cc: Travis Ahern, Executive Director
From: Matt Giancola, Director of Government Affairs and Policy
Date: October 9, 2025
Subject: **October 2025 Government Affairs Update**

Legislative Update

Acting Chair Bruce Stebbins, Executive Director Travis Ahern, and Government Affairs and Policy staff met with the Committee on Public Safety and Homeland Security Co-Chairs, Rep. Daniel Cahill and Sen. John Cronin to discuss social consumption and public safety considerations in draft regulations.

Municipal Update

Municipal Law Unit

The Attorney General's Municipal Law Unit (MLU) did not issue any marijuana-related decisions during the past month.





Cannabis Control Commission

Public Meeting

October 9, 2025 at 10:00 am

In-Person with Remote Access via Microsoft Teams



Agenda

1. Call to Order
2. Commissioner Comments and Updates
3. Appointment of Acting Secretary
4. Minutes
5. Executive Director and Commission Staff Report
6. Staff Recommendations on Changes of Ownership
7. Staff Recommendations on Renewal Licenses
8. Staff Updates on Expired Conditions on License Renewals
9. Staff Recommendations on Provisional Licenses
10. Staff Recommendations on Final Licenses
11. Staff Recommendations on Responsible Vendor Training
12. Staff Recommendations on Responsible Vendor Training Renewals
13. Hearing Officer Recommended Decision
14. Commission Discussion and Votes
15. New Business Not Anticipated at Time of Posting
16. Next Meeting Date
17. Adjournment



Executive Director and Commission Staff Report

Executive Director Report- Oct. 9, 2025

Presentations:

1. 8th Anniversary Video
2. FY2027 Budget Development Update
3. Update on MMJOS Transitions
4. Licensing Data Update



Executive Director Report- Oct. 9, 2025

Miscellaneous Updates

- Exclusivity Survey (for licensees) closing 10/10/25
 - Reminders sent to licensees this week and on social media
- Equitable Relief Requests (3) are waiting on Fiscal Impact Analysis (in process)
- AGO meeting with Chair/Executive Director to review votes from Sept. 2023 to Sept. 2025 under Acting Chair
- OML Trainings, per Governance Charter, underway for phase 1 (leadership)
- MassBudget Report on CCC and MRF
- Congratulations to Chief of Investigations & Enforcement (CIE), Nomxolisi Jones, on the 2025 Governor Paul Cellucci Award for Leadership & Mentoring in State Government!





Eighth Anniversary Video



8-YEAR ANNIVERSARY



FY 2027 Budget Development Update

Chief Financial and Accounting Officer Lisa Schlegel

Executive Director Report- Oct. 9, 2025

2. FY2027 Budget Development Update

- Timeline
- 2025 Goal Focus
- Social Consumption Estimates (Prelim.)
- No assumption of H.4206





Update on MMJOS Transitions

Chief Technology and Innovation Officer Paul Clark

MMJOS Transitions - Industry

The Commission has begun to the process to transition industry functions for MTC's from MMJOS to MassCIP and Metrc. These changes are intended to standardize functions and platforms.

- **These changes do not impact Patients, Caregivers and Healthcare Providers.** MMJOS will continue to be the only system they need to interact with.
- The changes are intended to improve workflow for both MTCs' as well as Commission Staff



MMJOS Transitions – Phases

Phase 1 – Older MTC License Transition

- Underway, expected to be completed by Dec 1
- Impacted MTCs will be contacted regarding process to setup accounts in MassCIP

Phase 2 – Patient Transaction Reporting in Metrc

- Metrc has created API's for JD Software to send patient eligibility, status and allotment quantities to Metrc and for Metrc to be prepared to add patient ID numbers to sales transactions.
- Once completed MTC's will be required all MTC's to record the patient/caregive ID number in Metrc either manually or via their POS system while still interacting with MMJOS for patient eligibility, allotment availability and recording transactions as well.



MMJOS Transitions – Phases

Phase 3 – Patient Allotment Management in Metrc

- JD Software will be completing the integration of MMJOS via API with Metrc so patient and caregivers can view allotment availability and sales history as recorded in Metrc from within MMJOS.
- MTCs will no longer be required to record transactions in MMJOS
- This phase will go live at least 60 days after patient sales transactions begin being recorded in Metrc.

Phase 4 – MTC Agent Registrations in MassCIP

- MTC agent registrations will be transition from MMJOS to MassCIP where the Adult Use Agent management occurs.
- Upon completion of this phase, MTC's will no longer have to access MMJOS for agent registrations or license and applications activities including renewals.



Benefits

- **Reduction in systems MTCs will need to access**
 - MassCIP and Metrc
- **Availability of API's to retrieving patient allotment availability, patient registrations status and reporting of patient sales**
 - Allows automated access from POS systems in a stable and secure manner
- **Streamlined Operations**
 - All applications and licenses will be electronic and managed in MassCIP
 - All agent registrations will be managed in MassCIP
 - All transactions reported in Metrc
 - Reduction in workflow steps for MTC's and Commission staff
- Enhanced reporting and monitoring capabilities



Training and Updates

- **The Commission will be providing updates to MTC's and Point of Sale (POS) systems operators in conjunction with our third-party providers (JD Software and Metrc)**
 - Metrc Bulletins
 - MassCIP & MMJOS Banners
 - Email
 - Via Social Media
- **Training and Documentation**
 - Coordination with third-party providers for existing documentation and training materials for API vendors and Marijuana Establishments
 - Existing test platforms for API integration development and testing with Metrc
 - Additional documentation or training to be developed as needed





Licensing Data Updates

Director of Licensing Olivia Koval

Highlights from Licensing Data

- 1 application awaiting first review
- 32 applications awaiting supplemental review
- 78,585 certified active patients



Licensing Applications | October 9, 2025

The totals below are number of approvals by stage.

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	238
Provisionally Approved	125
Provisional License	480
Final License	42
Commence Operations	766
Total	1,651

➡ + 9.6%

* Note: This represents the percent increase since September 2024.

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



Licensing Applications | October 9, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Active Commence Operation	Total
Craft Marijuana Cooperative	2	N/A	0	0	4	0	0	0	6
Marijuana Courier License	15	N/A	0	0	14	1	14	9	44
Marijuana Courier Pre-Certification	21	115	0	N/A	N/A	N/A	N/A	N/A	136
Independent Testing Laboratory	2	N/A	0	2	2	0	16	11	22
Marijuana Cultivator	48	N/A	2	43	184	17	146	123	440
Marijuana Delivery Operator License	7	N/A	0	0	23	0	19	17	49
Marijuana Delivery Operator Pre-Certification	16	118	0	N/A	N/A	N/A	N/A	N/A	134
Marijuana Microbusiness	11	N/A	0	4	15	2	15	12	47
Marijuana Product Manufacturer	49	N/A	1	42	130	15	126	107	363
Marijuana Research Facility	6	N/A	0	1	0	1	0	0	8
Marijuana Retailer	59	N/A	2	31	103	6	419	397	620
Marijuana Transporter with Other Existing ME License	6	N/A	0	2	4	0	4	3	16
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	1	9
Third Party Transporter	10	N/A	0	0	1	0	5	4	20
Standards Laboratory	0	N/A	0	0	0	0	0	0	0
Total	253	238	5	125	480	42	766	684	1,909



Active Cultivators | October 9, 2025

Type	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	5	2	12	19
Cultivation Tier 1 (Up to 5,000 sq. ft.)	7	5	22	34
Cultivation Tier 2 (5,001-10,000 sq. ft.)	16	2	36	54
Cultivation Tier 3 (10,001-20,000 sq. ft.)	9	2	25	36
Cultivation Tier 4 (20,001-30,000 sq. ft.)	3	2	8	13
Cultivation Tier 5 (30,001-40,000 sq. ft.)	0	0	9	9
Cultivation Tier 6 (40,001-50,000 sq. ft.)	2	0	8	10
Cultivation Tier 7 (50,001-60,000 sq. ft.)	1	0	2	3
Cultivation Tier 8 (60,001-70,000 sq. ft.)	0	0	1	1
Cultivation Tier 9 (70,001-80,000 sq. ft.)	0	0	1	1
Cultivation Tier 10 (80,001-90,000 sq. ft.)	0	0	6	6
Cultivation Tier 11 (90,001-100,000 sq. ft.)	2	1	5	9
Total	45	14	135	195
Total Maximum Canopy (Sq. Ft.)	850,000	255,000	3,340,000	4,545,000

+70.4%

+8.8%

* Note: percentage is of "Total" Cultivation commence operations licenses

**Note: Totals under "Total Maximum Canopy" do not reflect current canopy in use; rather the maximum that could be in use



Active Cultivators | October 9, 2025

Type	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	37	10	101	148
Marijuana Cultivator (Outdoor)	3	2	22	27
Total	40	12	123	175



Host Community Agreements Data | October 9, 2025

Overview	Total	SEP & EEA	DBE
The total number of applications received since March 1, 2024, containing an HCA	1,222	218	123
Number of Model HCAs received	322	32	35
Compliant Model HCAs	315	32	34
Number of Model HCA Waivers received	155	36	12
Compliant HCAs	1016	188	100
Non-Compliant HCAs	158	19	19
161 Towns with Compliant HCAs <i>Abington, Adams, Amesbury, Amherst, Ashburnham, Ashby, Athol, Attleboro, Avon, Ayer, Barre, Becket, Belchertown, Belmont, Berkley, Bernardston, Beverly, Blackstone, Blandford, Bolton, Boston, Bourne, Bridgewater, Brimfield, Brockton, Brookfield, Brookline, Cambridge, Charlton, Chelsea, Cheshire, Chicopee, Clinton, Colrain, Cummington, Danvers, Dartmouth, Deerfield, Dighton, Douglas, Dracut, Eastham, Easthampton, Egremont, Essex, Fairhaven, Fall River, Fitchburg, Framingham, Franklin, Gardner, Georgetown, Gill, Gloucester, Grafton, Great Barrington, Greenfield, Groton, Hadley, Halifax, Hanson, Hardwick, Hatfield, Haverhill, Holbrook, Holliston, Holyoke, Hopedale, Hubbardston, Hudson, Hull, Kingston, Lakeville, Lanesborough, Lee, Leicester, Lenox, Littleton, Lowell, Lunenburg, Lynn, Malden, Mansfield, Marblehead, Marlborough, Marshfield, Mashpee, Maynard, Medford, Medway, Melrose, Mendon, Merrimac, Middleborough, Milford, Millbury, Millis, Monson, Montague, Natick, Needham, New Bedford, Newton, North Adams, North Attleborough, North Brookfield, Northampton, Norton, Norwood, Orange, Orleans, Palmer, Phillipston, Pittsfield, Plainfield, Plainville, Plymouth, Provincetown, Quincy, Rehoboth, Rockland, Rowley, Royalston, Rutland, Salem, Salisbury, Sandisfield, Sandwich, Sharon, Sheffield, Shrewsbury, Somerville, Southbridge, Southwick, Springfield, Sterling, Sturbridge, Sunderland, Swansea, Taunton, Templeton, Tewksbury, Tisbury, Tyngsborough, Uxbridge, Wakefield, Waltham, Ware, Wareham, Webster, Wellfleet, West Springfield, West Tisbury, Westfield, Weymouth, Whately, Whitman, Williamstown, Winchendon, Woburn, Worcester.</i>			



Host Community Agreements Data | October 9, 2025

HCA Review Status	Total
Number of HCAs reviewed	1,202
Number of HCAs currently under review	20
Number of Host Community Agreement Determination Notices sent out	816

Extensions	Total
Extension requests received	2,208
Extension requests that received conditional pre-approval	77
Extension requests granted	2,064
Average number of days requested	87





Staff Recommendations: Changes of Ownership

Staff Recommendations: Changes of Ownership

1. Cosmopolitan Dispensary, Inc.
2. Green World, LLC





Staff Recommendations: Licensing Renewals

Staff Recommendations: Licensing Renewals

1. 140 Industrial Road, LLC (#MPR244320)
2. ACMJ, Inc. (#MCR140956)
3. Alternative Therapies Group II, Inc. (#MRR206952)
4. Cedar Roots LLC (#MCR140957)
5. Curaleaf Massachusetts, Inc. (#MPR244348)
6. Curaleaf Massachusetts, Inc. (#MCR140952)
7. Ember Gardens Cape Cod LLC (#MRR207313)
8. Four Daughters Compassionate Care, Inc.
(#MPR244356)
9. Four Daughters Compassionate Care, Inc.
(#MRR207348)
10. Green Meadows Farm, LLC (#MCR140761)
11. Green Meadows Farm, LLC (#MPR244185)
12. Hennep, Inc. (#MRR207134)
13. High Hopes LLC (#MRR206989)
14. House of Ermias (#MRR207341)
15. I.N.S.A., Inc. (#MRR207333)
16. In Good Health, Inc. (#MRR207087)
17. J - B.A.M., INC. (#MCR140946)
18. J - B.A.M., INC. (#MPR244345)
19. Mass Cannabis Growers Cooperative (#COR129716)



Staff Recommendations: Licensing Renewals

- 20. Massachusetts Green Retail, Inc. (#MRR207340)
- 21. Mayflower Medicinals, Inc. (#MRR207328)
- 22. Mayflower Medicinals, Inc. (#MRR207334)
- 23. Mayflower Medicinals, Inc. (#MPR244352)
- 24. Motah 420 LLC (#MPR244353)
- 25. Ocean Breeze Cultivators LLC (#MRR207360)
- 26. Paper Crane Provisions, LLC (#MCR140711)
- 27. SAWF Estate LLC (#MRR207283)
- 28. SunnyDayz Inc. (#MCR140960)
- 29. Surf's Up Cannabis Ventures LLC (#MRR207279)
- 30. Trifecta Farms Corp (#MCR140963)
- 31. Witch City Gardens LLC (#MRR207352)





Staff Updates on Expired Conditions on License Renewals

Staff Updates on Expired Conditions on License Renewals

1. New Dia Fenway LLC (MRR207158)
2. GreenSoul Organics, Inc. (MRR207239)





Staff Recommendations: Provisional Licenses

Staff Recommendations: Provisional Licenses

1. Canna-Farm LLC (#MCN283953), Marijuana Cultivator / Tier 5 / Indoor
2. WildWeeds Corp (#MBN282540), Marijuana Microbusiness





Staff Recommendations: Final Licenses

Staff Recommendations: Final Licenses

1. Tower Three, LLC (#MP281783), Marijuana Product Manufacturer
2. Uproot, LLC (#MD1344), Marijuana Delivery Operator





Staff Recommendations: Responsible Vendor Training

Staff Recommendations: Responsible Vendor Training

1. Online Training Providers LLC (DBA Cannabis Training University, CTU, Online Cannabis Education, OCE)
(#RVN453966)





Staff Recommendations: Responsible Vendor Training Renewals

Staff Recommendations: Responsible Vendor Training Renewals

1. Cannabis Trainers (#RVR453160)
2. Medical Marijuana 411 (MM411, Inc) (#RVR453155)
3. Stoker Consulting LLC (#RVR453154)





Hearing Officer Recommended Decision

Hearing Officer Recommended Decision

1. Elev8 Cannabis, Inc.





Commission Discussion & Votes

Commission Discussion and Votes

1. License Extensions for Host Community Agreement Compliance (*Vote*)
2. Delegation for Petitions to Changes of Regulations (*Vote*)
3. Eighth Annual Activities Report (*Vote*)
4. General Matters Legal Billing
5. Standing Delegation of Acting Chair





Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

**Public Meeting dates are tentative and subject to change*

Next Meeting Date

October 9, 2025

Public Meeting
Remote via Teams
4:55 pm

2025 Public Meetings*
October 23
October 24
November 13
December 11





The Commission is in Executive Session



Additional Licensing Data

Licensing Applications | October 9, 2025

The totals below are all license applications received to date.

Type	#
Pending	253
Withdrawn	1,768
Incomplete	9,695
Denied	5
Approved: Delivery Pre-certifications	233
Approved: Delivery Endorsements	5
Approved: Licenses	1,436
Total	13,395



Licensing Applications | October 9, 2025

The totals below are number of licenses approved by category.

Type	#
Craft Marijuana Cooperative	4
Marijuana Courier	28
Marijuana Delivery Operator	42
Independent Testing Laboratory	20
Marijuana Cultivator	389
Marijuana Microbusiness	36
Marijuana Product Manufacturer	314
Marijuana Research Facility	2
Marijuana Retailer	559
Marijuana Third Party Transporter	6
Marijuana Transporter with Other Existing ME License	10
Total	1,410



Licensing Applications | October 9, 2025

Status	#
Application Submitted: Awaiting Review	5
Application Reviewed: More Information Requested	250
Application Deemed Complete: Awaiting 3rd Party Responses	5
All Information Received: Awaiting Commission Consideration	1
Applications Considered by Commission (includes Delivery Pre-Cert)	1,648
Total	1,909



Licensing Applications | October 9, 2025

The totals below are applications that have submitted all four packets and are pending review.

Type	#
Craft Marijuana Cooperative	2
Marijuana Courier Provisional Licensure (Part 2)	15
Marijuana Courier Pre-Certification (Part 1)	21
Independent Testing Laboratory	2
Marijuana Cultivator	48
Marijuana Delivery Operator Provisional License (Part 2)	7
Marijuana Delivery Operator Pre-Certification (Part 1)	16
Marijuana Microbusiness	11
Marijuana Product Manufacturer	49
Marijuana Research Facility	6
Marijuana Retailer	59
Marijuana Transporter with Other Existing ME License	6
Microbusiness Delivery Endorsement	1
Third Party Transporter	10
Standards Laboratory	0
Total	253



Cultivation Applications | October 9, 2025

Type	Pending Application	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	12	0	4	15	2	15	47
Cultivation Tier 1 (Up to 5,000 sq. ft.)	14	0	3	37	6	28	88
Cultivation Tier 2 (5,001-10,000 sq. ft.)	6	0	7	59	4	39	115
Cultivation Tier 3 (10,001-20,000 sq. ft.)	5	2	8	43	2	29	89
Cultivation Tier 4 (20,001-30,000 sq. ft.)	3	0	3	11	3	10	30
Cultivation Tier 5 (30,001-40,000 sq. ft.)	2	0	9	6	1	11	29
Cultivation Tier 6 (40,001-50,000 sq. ft.)	3	0	4	7	0	8	22
Cultivation Tier 7 (50,001-60,000 sq. ft.)	2	0	1	4	0	4	11
Cultivation Tier 8 (60,001-70,000 sq. ft.)	1	0	0	1	0	3	5
Cultivation Tier 9 (70,001-80,000 sq. ft.)	3	0	1	3	1	1	9
Cultivation Tier 10 (80,001-90,000 sq. ft.)	1	0	1	0	0	6	8
Cultivation Tier 11 (90,001-100,000 sq. ft.)	8	0	5	13	1	6	33
Total	60	2	47	199	19	161	488
Total Maximum Canopy (Sq. Ft.)	1,840,000	40,000	1,685,000	4,480,000	555,000	4,435,000	13,035,000

+69.4%

+8.1%

* Note: percentage is of "Total" Cultivation commence operations licenses

**Note: Totals under "Total Maximum Canopy" do not reflect current canopy in use; rather the maximum that could be in use



Licensing Applications | October 9, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	39	N/A	1	38	167	14	121	380
Marijuana Cultivator (Outdoor)	9	N/A	1	5	17	3	25	60
Total	48	N/A	2	43	184	17	146	440



Licensing Applications | October 9, 2025

Of 1,640 applications approved by the Commission, the following applications have Economic Empowerment Priority Review, Social Equity Program Participant, and/or Disadvantaged Business Enterprise status. Please note, applicants may hold one or more statuses. **Please note that the end total represents the total number of applications/licenses at that step in the licensure process.**

Type	Economic Empowerment	Social Equity Program	Disadvantaged Business Enterprise	Total
Pre-Certified/Delivery Endorsed Microbusiness	46	199	31	276
Provisionally Approved	8	19	22	49
Provisional License	30	94	106	230
Final License	1	3	7	11
Commence Operations	32	76	102	210
Total	117	391	268	776

-2.5%

+18.1%

+8.9%

*Note: This represents the increase since September 2024



Licensing Applications | October 9, 2025

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

The 1,909 applications represent 1,104 separate entities

Type	#
MTC Priority	267
Economic Empowerment Priority	142
Expedited Review	749
General Applicant	751
Total	1,909

Type	#
Expedited: License Type	79
Expedited: Social Equity Participant	385
Expedited: Disadvantaged Business Enterprise	186
Expedited: Two or More Categories	99
Total	749



Licensing Applications – EE Only | October 9, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	0	0	0	0
Marijuana Courier License	5	N/A	0	0	5	0	4	14
Marijuana Courier Pre-Certification	4	32	0	N/A	N/A	N/A	N/A	36
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	1	N/A	0	2	7	0	0	10
Marijuana Delivery Operator License	1	N/A	0	0	3	0	3	7
Marijuana Delivery Operator Pre-Certification	2	14	0	N/A	N/A	N/A	N/A	16
Marijuana Microbusiness	1	N/A	0	0	0	0	0	1
Marijuana Product Manufacturer	1	N/A	0	3	3	0	3	10
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	7	N/A	0	2	11	1	22	43
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	1	0	0	3
Microbusiness Delivery Endorsement	0	0	0	0	0	0	0	0
Third Party Transporter	1	N/A	0	0	0	0	0	1
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	25	46	0	8	30	1	32	142



Licensing Applications – SEP Only | October 9, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	1	0	0	1
Marijuana Courier License	12	N/A	0	0	9	1	10	32
Marijuana Courier Pre-Certification	18	89	0	N/A	N/A	N/A	N/A	107
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	7	N/A	0	5	20	0	10	42
Marijuana Delivery Operator License	5	N/A	0	0	20	0	16	41
Marijuana Delivery Operator Pre-Certification	13	105	0	N/A	N/A	N/A	N/A	118
Marijuana Microbusiness	4	N/A	0	0	5	0	2	11
Marijuana Product Manufacturer	13	N/A	0	7	17	0	8	45
Marijuana Research Facility	0	N/A	0	0	0	0	0	0
Marijuana Retailer	20	N/A	1	6	20	2	26	75
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	1	0	2	5
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	8
Third Party Transporter	4	N/A	0	0	1	0	0	5
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	98	199	1	19	94	3	76	490



Non-Active Licenses By Stage | October 9, 2025

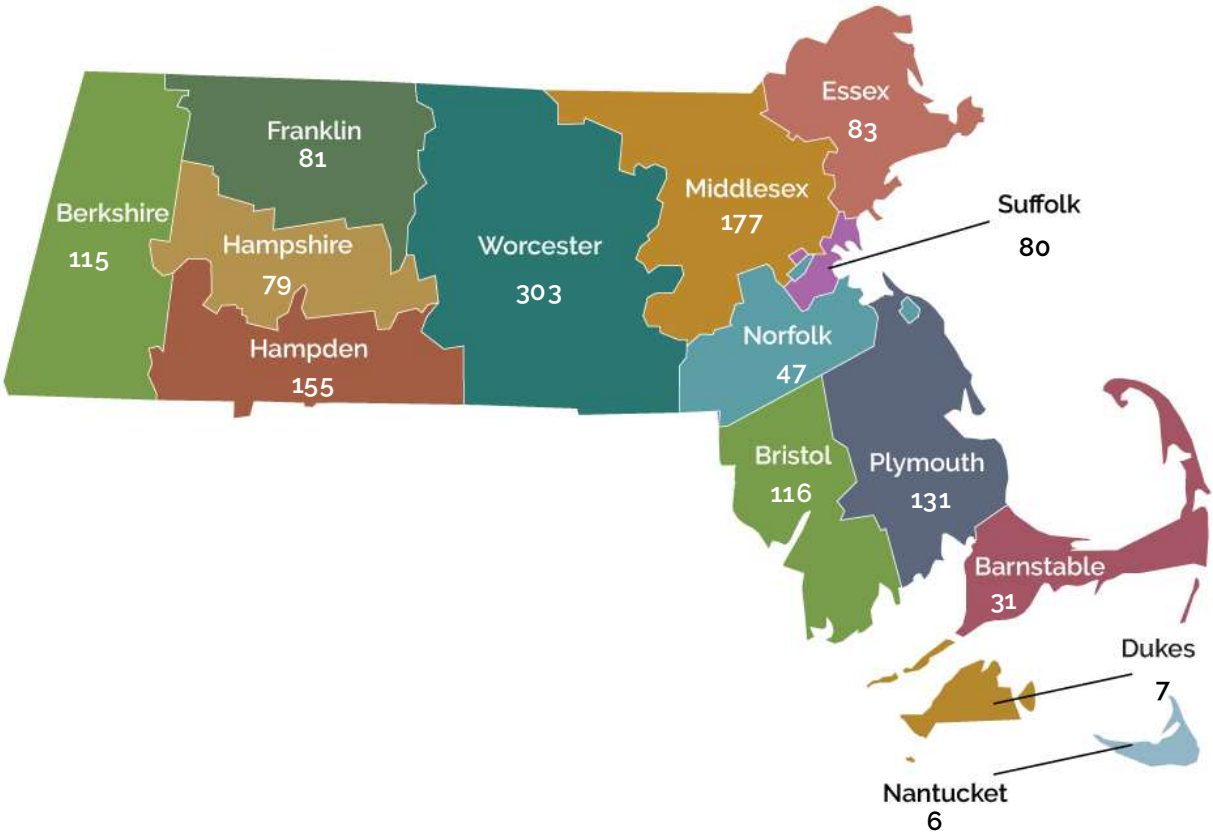
Type	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	2	0	0	2
Marijuana Courier License	7	1	4	12
Independent Testing Laboratory	2	0	4	6
Marijuana Cultivator	133	5	20	158
Marijuana Delivery Operator License	14	0	2	16
Marijuana Microbusiness	10	0	3	13
Marijuana Product Manufacturer	87	6	19	112
Marijuana Research Facility	0	0	0	0
Marijuana Retailer	50	1	22	73
Marijuana Transporter with Other Existing ME License	2	0	0	2
Third Party Transporter	0	0	1	1
Standards Laboratory	0	0	0	0
Total	307	13	75	395



Marijuana Establishment Licenses | October 9, 2025

The totals below represent entities in each county that have achieved at least a provisional license

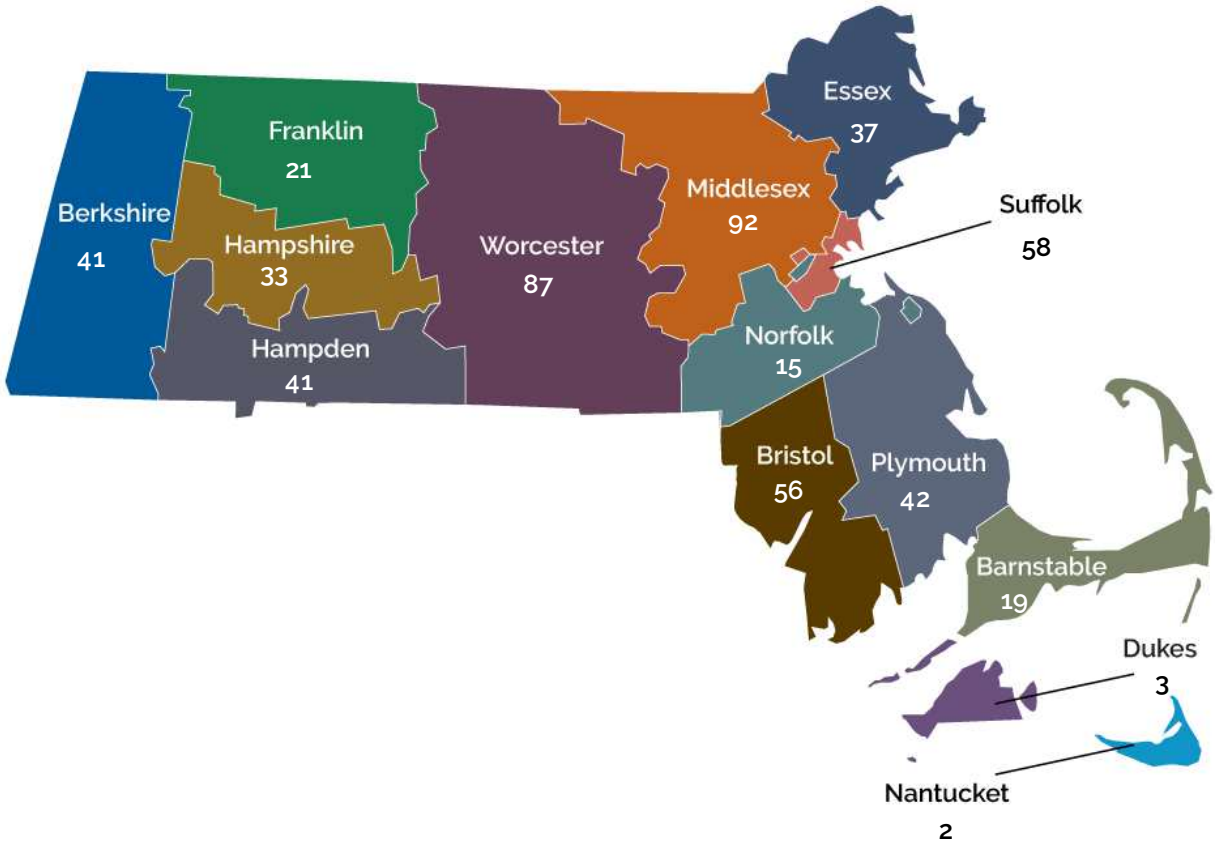
County	#	+/-
Barnstable	31	0
Berkshire	115	0
Bristol	116	0
Dukes	7	0
Essex	82	0
Franklin	81	0
Hampden	155	2
Hampshire	79	2
Middlesex	177	1
Nantucket	6	0
Norfolk	47	0
Plymouth	131	0
Suffolk	80	0
Worcester	303	4
Total	1,410	10



Marijuana Retailer Licenses | October 9, 2025

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

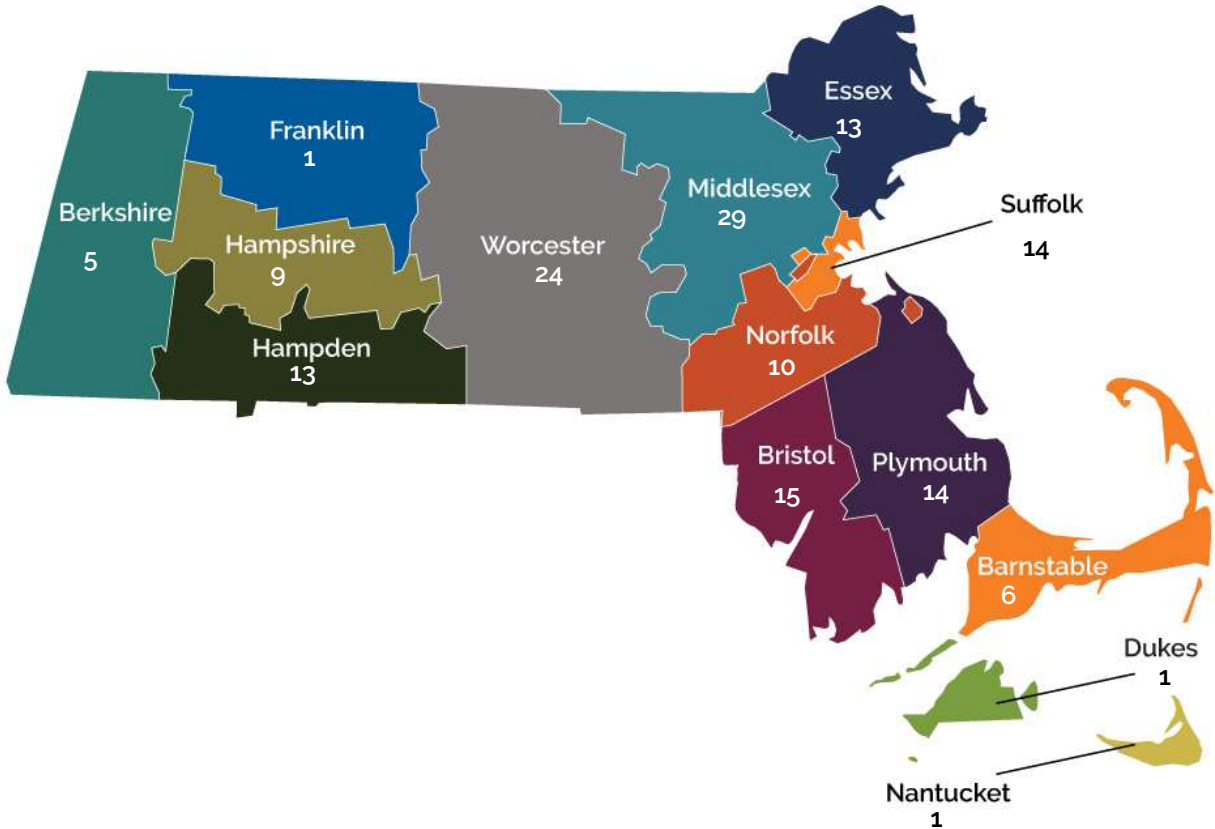
County	#	+/-
Barnstable	19	0
Berkshire	41	0
Bristol	56	0
Dukes	3	0
Essex	37	0
Franklin	21	0
Hampden	44	1
Hampshire	33	0
Middlesex	92	0
Nantucket	2	0
Norfolk	15	0
Plymouth	45	0
Suffolk	63	0
Worcester	88	1
Total	559	2



Medical Marijuana Treatment Center Licenses (Dispensing) October 9, 2025

The totals below are the total number of MTC (Dispensing) licenses by county.

County	#
Barnstable	6
Berkshire	5
Bristol	15
Dukes	1
Essex	13
Franklin	1
Hampden	13
Hampshire	9
Middlesex	29
Nantucket	1
Norfolk	10
Plymouth	14
Suffolk	14
Worcester	24
Total	155



MMJ Licensing and Registration Data | October 9, 2025

The numbers below are a snapshot of the program as of the month of August

MTC Licenses	#
Provisional	2
Final	0
Commence Operations	95
License Expired	97
Total	194

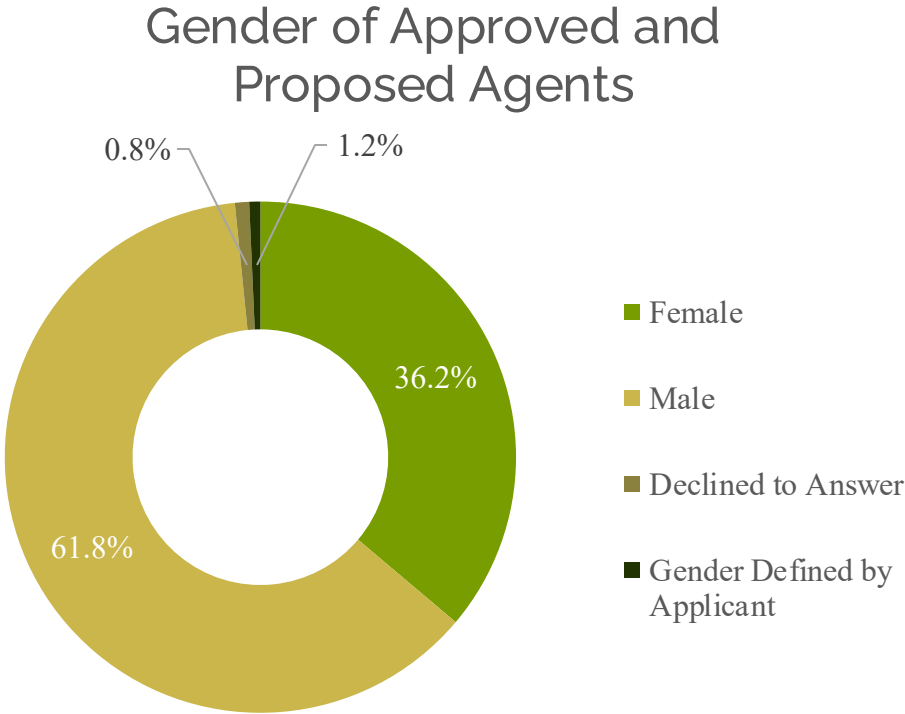
MMJ Program	#
Certified Patients	82,177
Certified Active Patients	78,585
Active Caregivers	5,594
Registered Certifying Physicians	346
Registered Certifying Nurse Practitioners	130
Registered Physician Assistants	7
Ounces Sold	89,474



Agent Applications | October 9, 2025

Demographics of Approved and Pending Marijuana Establishment Agents

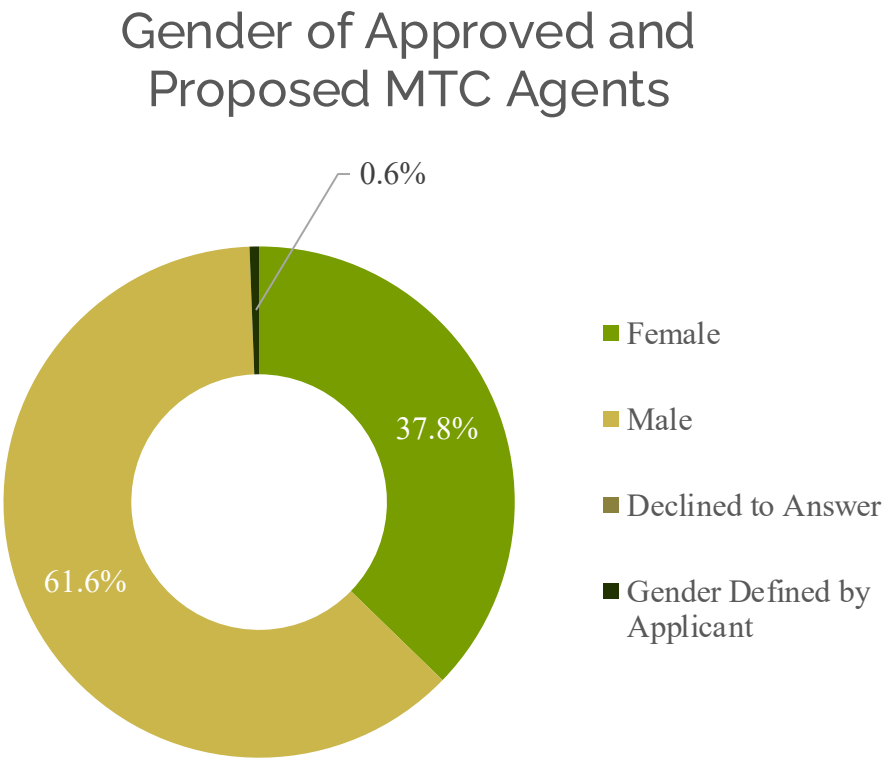
Gender	#	%
Female	7,639	36.2%
Male	13,028	61.8%
Declined to Answer	248	1.2%
Gender Defined by Applicant	160	0.8%
Total	21,075	100.0%



Agent Applications | October 9, 2025

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

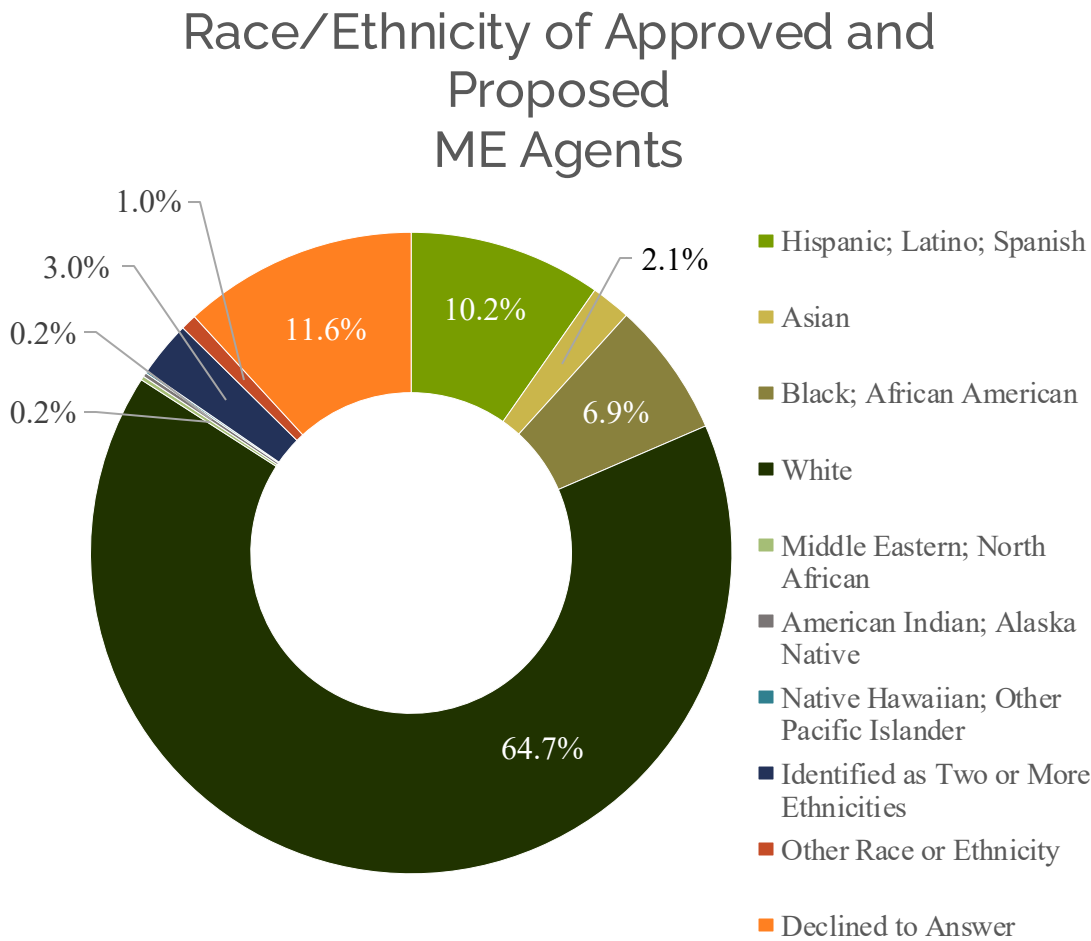
Gender	#	%
Female	1,961	37.8%
Male	3,193	61.6%
Declined to Answer	0	0.0%
Gender Defined by Applicant	30	0.6%
Total	5,184	100.0%



Agent Applications | October 9, 2025

Demographics of Approved and Pending Marijuana Establishment Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	2,143	10.2%
Asian	452	2.1%
Black; African American	1,454	6.9%
White	13,641	64.7%
Middle Eastern; North African	49	0.2%
American Indian; Alaska Native	33	0.2%
Native Hawaiian; Other Pacific Islander	16	0.1%
Identified as Two or More Ethnicities	630	3.0%
Other Race or Ethnicity	205	1.0%
Declined to Answer	2,452	11.6%
Total	21,075	100.0%

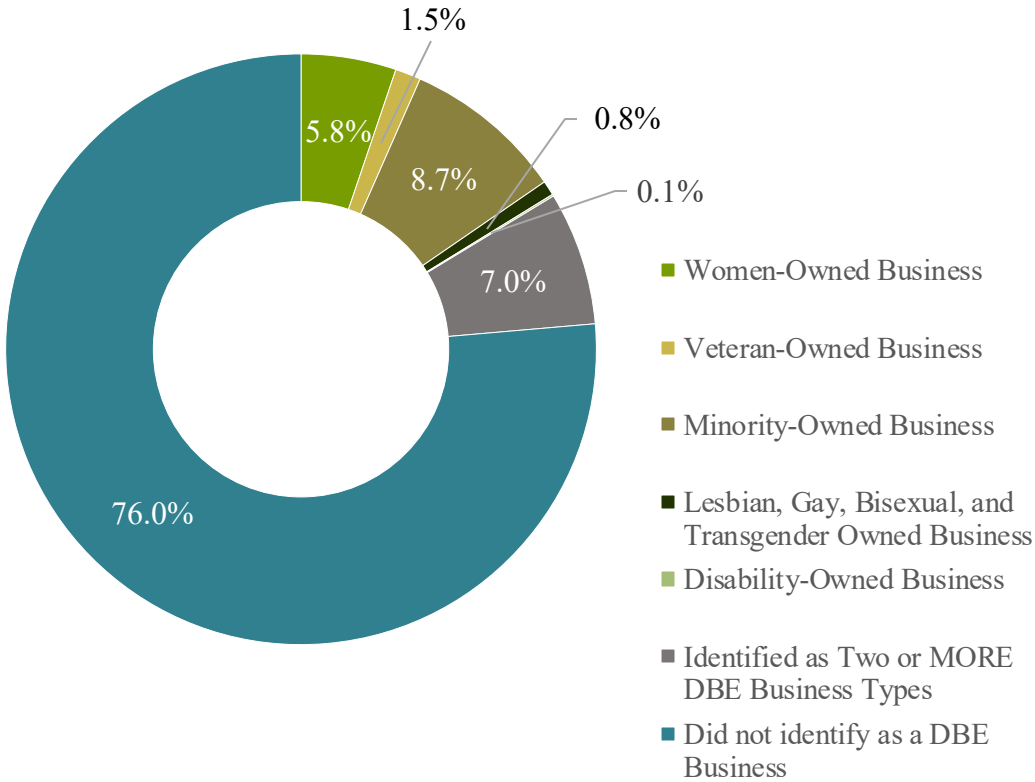


Licensing Applications | October 9, 2025

Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	97	5.8%
Veteran-Owned Business	25	1.5%
Minority-Owned Business	146	8.7%
Lesbian, Gay, Bisexual, and Transgender Owned Business	13	0.8%
Disability-Owned Business	2	0.1%
Identified as Two or MORE DBE Business Types	117	7.0%
Did not identify as a DBE Business	1,269	76.0%
Total	1,669	100.0%

DBE Statistics Approved Licensees

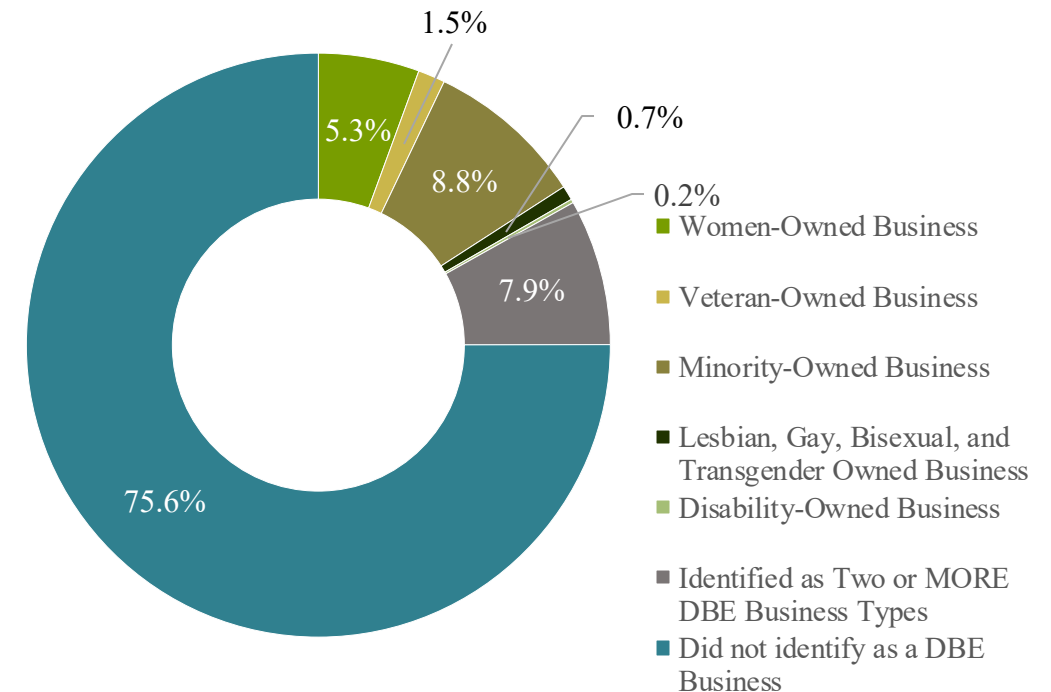


Licensing Applications | October 9, 2025

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

Type	#	% of Group
Women-Owned Business	101	5.3%
Veteran-Owned Business	28	1.5%
Minority-Owned Business	167	8.8%
Lesbian, Gay, Bisexual, and Transgender Owned Business	14	0.7%
Disability-Owned Business	4	0.2%
Identified as Two or MORE DBE Business Types	151	7.9%
Did not identify as a DBE Business	1,442	75.6%
Total	1,907	100.0%

DBE Statistics for Pending & Approved License Applications



Adult Use Agent Applications | October 9, 2025

Total Agent Applications: 91,480

- 224 Total Pending
 - 219 Pending Establishment Agents
 - 5 Pending Laboratory Agents
- 4,303 Withdrawn
- 3,144 Incomplete
- 8,527 Expired
- 54,397 Surrendered
- 6 Denied / 2 Revoked
- 26 Suspended
- **20,851 Active**

Of the 156 Total Pending:

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



Medical Use Agent Applications | October 9, 2025

The total number of MTC agent applications received by status.

MTC Agent Application	#
Pending MTC Agent Applications	18
Pending Laboratory Agent Applications	0
Incomplete	29
Revoked	13
Denied	31
Surrendered	22,969
Expired	3,921
Active	5,106
Total	32,087





**The Commission is in recess
until 2:40**