



April 7, 2026

Boston Bud Factory, Inc.
73 Sergeant Street
Holyoke, Massachusetts
MR281525
MP281397

Case No. ENF-2022-0000001221
and ENF-2022-0000001221a

and

Franklyn Dailey
109 Pennsylvania Ave.
Springfield, MA 01118

FINAL ORDER AND STIPULATED AGREEMENT

This Final Order and Stipulated Agreement (herein, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (the “Commission”), Boston Bud Factory, Inc. (“Respondent Licensee”) and Franklyn Dailey (“Respondent Dailey”) (collectively referred to herein as, the “Parties”) is offered for the purposes of settlement and in lieu of further administrative action. The Commission finds that resolution of this matter serves the purposes of G.L. c. 94G, 935, CMR 500.360, and 935 CMR 500.500.

Accordingly, the Parties stipulate to the Facts of Record and Applicable Law, as presented by the Commission, but Respondent Licensee and Respondent Daily neither admit nor deny the Commission’s Findings, which are contained in Paragraphs 72 through 75 of this Order. In lieu of the uncertainty and cost of proceeding with an Administrative Hearing pursuant to 935 CMR 500.500, the Parties have agreed to resolve this matter through the Informal Dispute Resolution process. Respondent Licensee and Respondent Dailey have voluntarily agreed to the Stipulated Remedies and, subject to ratification by majority vote of the Commission, this Order is binding on the Parties for the purpose of bringing this matter to a final resolution.

Legislative, Statutory, and Regulatory Authority

1. The Commission has jurisdiction over the conduct and operations of licensed Marijuana Establishments and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, including G.L. c. 94G and 935 CMR 500.000 *et seq.*;
2. The Commission possesses all powers necessary or convenient to carry out and effectuate its purposes including conducting investigations to ensure compliance with Commission



laws, imposing fines, or otherwise restricting a license for violations of G.L. c. 94G or any regulation promulgated by the Commission;

3. The Commission's statute directed the Commission to adopt regulations for the administration, clarification, and enforcement of laws regulating and licensing Marijuana Establishments to include:
 - a. Qualifications for licensure and employment. *See* G.L. c. 94G, § 4(a½)(iii);
 - b. Procedures and grounds for the revocation and suspension of a license or registration. *See* G.L. c. 94G, § 4(a½)(xi);
 - c. Requirements for record keeping by Marijuana Establishments and procedures to track Marijuana cultivated, processed, manufactured, delivered or sold by Marijuana Establishments. *See* G.L. c. 94G, § 4(a½)(xiii);
 - d. Minimum security requirements for licensees sufficient to deter and prevent theft and unauthorized entrance into areas containing marijuana, which shall include but not be limited to the use of security cameras. *See* G.L. c. 94G, § 4(a½)(xviii);
 - e. Minimum requirements for the advertising, marketing and branding of marijuana and marijuana products. *See* G.L. c. 94G, § 4(a½)(xxix);
4. Pursuant to its authority under G.L. c. 94G, §§ 4(a), 4(a½), the Commission may issue a Notice of Fines to show cause as to why a fine or other financial penalty against a Licensee should not be imposed for any acts or omissions determined to be in violation of the state Marijuana laws. *See* 935 CMR 500.360;
5. Pursuant to its authority under G.L. c. 94G, § 4(a)(xiv) and 935 CMR 500.032 the Commission may suspend or revoke individual agent registrations for any acts or omissions determined to be in violation of 935 CMR 500.000, *et. al.*;

Facts of Record

6. Respondents were subject to an investigation by the Commission. From that investigation, the Commission alleges violations of Commission regulations, 935 CMR 500.000, relative to Respondent Licensee's retail operations at its facility in Holyoke, Massachusetts;
7. On February 22, 2024, the Commission issued a Notice of Fines to Respondent Licensee;
8. On February 22, 2024, the Commission issued an Order to Show Cause – Revocation of Agent Registration to Respondent Dailey;
9. On March 4, 2024, Respondents, through counsel, submitted a request for Informal Dispute Resolution, which stayed enforcement proceedings;
10. On August 13, 2024, Respondents submitted a hearing request;



11. Prior to hearing, the parties continued discussions to resolve this matter, resulting in this Order;
12. Franklyn Dailey is a Marijuana Establishment Agent (“Dailey”) associated with Boston Bud Factory, Inc., (“BBF” or the “Licensee”), a Marijuana Retailer (MR281525) and Marijuana Product Manufacturer (MP281397) located at 73 Sargeant Street, Holyoke, Massachusetts; (the “Holyoke Store”), and a corporate headquarters located at 37 Commercial Street, Holyoke, Massachusetts (“BBF Headquarters”);
13. Dailey is the majority owner of BBF and exercises direct control over the day-to-day operations of BBF with Carlo Sarno (“Sarno”), a minority owner of the Licensee;
14. BBF Headquarters is located less than a mile away from the Holyoke Store and is also home to an arcade bar and event space called “The Joint.” The building is owned by a company under the control of Sarno;
15. On March 18, 2022, Commission Investigators conducted an unannounced inspection at The Joint;
16. During an inspection of the bar, Commission Investigators located BBF-branded Marijuana pre-rolls in an arcade machine;
17. Commission Investigators retrieved a 0.3g Marijuana pre-roll, Metrc ID 1A40A0300001B59000000236, from the arcade machine;
18. According to the Commission’s Seed-to-Sale System of Record, Metrc, the pre-roll was sold at BBF’s retail store by Dailey on February 8, 2022 in a package of 21 pre-rolls for one dollar per pre-roll;
19. Staff at The Joint informed Commission Investigators that the arcade machine was restocked weekly;
20. A staff member also invited Commission Investigators to attend a Marijuana social event taking place on March 24, 2022. The staff member claimed these events were held weekly on the second floor of The Joint;
21. The Joint is a separate business entity and operates independently from BBF;
22. Dailey identified Sarno as the owner of The Joint to Commission investigators;
23. The Joint is not an authorized location for the distribution of Marijuana under BBF’s licenses;



24. The Marijuana pre-roll obtained by Commission Investigators had a Metrc ID indicating that the pre-roll was a blend of two distinct strains of Marijuana flower—Durban Thai, and Cindy 99;
25. The Marijuana pre-roll’s Metrc ID traced the product back to BBF’s retail store;
26. In the licensee’s vault, Commission Investigators discovered a box of 0.3g Durban Thai/Cindy 99 Marijuana pre-roll blends;
27. The box of Durban Thai/Cindy 99 Marijuana pre-rolls was labeled “Not for Retail,” and placed behind other boxes out of direct view;
28. According to the Commission’s seed-to-sale System of Record (Metrc), and point of sale records, BBF had sold 0.3g pre-rolls multiple times, both to employees of BBF and to consumers;

Facts Pertaining to Respondent Dailey

29. On August 14, 2019, the Commission registered Dailey as an Agent for BBF and issued him Agent Registration nos. AR287654 and AR287627;
30. On September 23, 2023, the Commission registered Dailey as an Agent for a Marijuana Cultivator unrelated to BBF under Agent Registration no. AR345891 which expired on September 22, 2024;
31. On March 24, 2022, Commission Investigators entered BBF’s retail location and asked an employee for a 0.3g pre-roll identical to the Marijuana pre-roll investigators obtained from the arcade machine at The Joint;
32. After the employee could not find any 0.3g pre-rolls, the employee asked Dailey if there were any in stock. Dailey then told Commission Investigators, “We don’t sell 0.3g pre-rolls”;
33. On the same day, Commission Investigators went to The Joint to observe the Marijuana social event on the second floor of the bar;
34. At the event, Commission Investigators observed several vendors selling Marijuana at tables throughout the room;
35. Commission Investigators witnessed Dailey at the event approaching tables and conversing with vendors. Commission Investigators also observed Dailey showing a rosin press, bearing BBF branding, to attendees;
36. Dailey told Commission Investigators that the rosin press was from BBF, and that he would rent it out to anyone who wished to use it;



37. Dailey invited Commission Investigators to attend the “4/20 Block Party event” (the “block party”) being hosted and sponsored by BBF on April 20, 2022. The block party was to be held in The Joint’s parking lot;
38. On April 20, 2022, Commission Investigators attended the block party;
39. At the block party, Commission Investigators found that the arcade machine inside The Joint had been restocked with pre-rolls;
40. On the same day as the block party, another team of Commission Investigators conducted an unannounced inspection of BBF’s retail location;
41. At the inspection, Commission Investigators found that 0.3g pre-rolls had been sold multiple times, often for one dollar per pre-roll, to Dailey, an employee of BBF, and another individual unaffiliated with BBF;
42. In BBF’s vault, Commission Investigators also discovered a box containing pre-rolls identical to the ones found in the arcade machine at The Joint. The box was labeled “Not for Retail” and was placed behind other boxes in the vault;
43. During the inspection, Commission Investigators asked Dailey about the pre-rolls labeled as “Not for Retail”;
44. Dailey told Commission Investigators that the Marijuana pre-rolls were his “personal stash”, and that they were “only 0.3 grams”;
45. Dailey then stated that his employees or another owner may have purchased some pre-rolls and had access to the same;
46. When asked if he ever gave the Marijuana pre-rolls away, Dailey stated “I do not give them out to people”;
47. When asked how the pre-rolls ended up in the arcade machine at The Joint, Dailey stated that Sarno had purchased the pre-rolls and filled the arcade machine;
48. When asked about why Dailey’s name appeared on the seed-to-sale (Metr) tracking record for the pre-rolls inside The Joint, Dailey replied “I probably gifted it to [Sarno], and he did what he pleased with the product”;
49. Dailey further told Commission Investigators he knew of the arcade machine containing BBF’s Marijuana pre-rolls “a couple weeks ago”, when he was contacted by the Holyoke Chamber of Commerce;



50. Commission Investigators learned that on April 7, 2022, Dailey had told the Holyoke Chamber of Commerce that the Marijuana pre-rolls were “leftover from a private party”, and that it “wouldn’t happen again”;
51. When asked if he knew anything about the event at The Joint on March 24, 2022, Dailey stated that he was aware of “yoga” and “bingo” on the second floor of The Joint. When asked if he knew of any sales of Marijuana on the second floor of The Joint, Dailey said “Not to my knowledge”;
52. When asked about the rosin press at The Joint, Dailey stated that he privately owned the press and that it was not involved in BBF’s manufacturing process;

Facts Pertaining to Respondent Licensee

53. On April 9, 2020, the Commission granted BBF a final license to operate as a Marijuana Retailer under License no. MR281525. On August 6, 2020, the Commission approved BBF for final licensure to operate as a Marijuana Product Manufacturer under License no. MP281397;
54. BBF commenced retail operations on July 6, 2020, and product manufacturing operations on October 25, 2021;
55. On March 24, 2022, Commission Investigators entered the Holyoke Store without identifying themselves to BBF employees with the intent of purchasing a 0.3g pre-roll, like the pre-roll obtained from the arcade machine at The Joint;
56. Commission Investigators examined the menu provided by BBF staff, they found that BBF had 0.5g pre-rolls of Durban Thai/Cindy 99 available for sale, but not the 0.3g pre-rolls found in the arcade machine at The Joint;
57. Around the time of the unannounced inspection, Commission Investigators also learned that BBF was advertising and promoting a Marijuana themed social event on Facebook and other social media. The advertising indicated that there would be a block party on April 20, 2022, at The Joint, sponsored by BBF;
58. On April 20, 2022, Commission Investigators attended the block party, which occurred in the parking lot of The Joint and BBF’s corporate headquarters;
59. The block party was open to the public and prominently displayed Marijuana advertisements and vendors, including BBF;
60. During the time they attended the block party, Commission Investigators did not observe BBF staff controlling access to the block party or verifying the age of attendees or participants on entry;



61. On April 20, 2022, the same day as the block party, Commission Investigators conducted an unannounced inspection of the Holyoke Store and observed Marijuana Product packaging and a rosin press located in an open area on the sales floor;
62. Commission Investigators also observed a sign placed on the floor near the open area containing the Marijuana Product packaging and rosin press that said “limited access” but there was no barrier preventing access to the area;

Applicable Law

63. Each of the following, in and of itself, constitutes full and adequate grounds for revocation of an agent Registration Card issued to a Marijuana Establishment Agent, including Laboratory Agents ... (b) Violation of the requirements of the state Marijuana laws, including 935 CMR 500.000. *See* 935 CMR 500.032;
64. The Marijuana Establishment may post prices in the store and may respond to questions about pricing. The Marijuana Establishment shall provide a catalogue or a printed list of the prices and strains of Marijuana available at the Marijuana Establishment to Consumers and may post the same catalogue or printed list on its website and in the retail store. *See* 935 CMR 500.105(4)(a)6;
65. A Marijuana Establishment shall not engage in Brand Name Sponsorship of a charitable, sporting or similar event, unless such Advertising is targeted to entrants or participants reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data, and reasonable safeguards have been employed to prohibit Advertising from targeting or otherwise reaching entrants or participants reasonably expected to be under 21 years of age, as determined by reliable, current audience composition data. *See* 935 CMR 500.105(4)(b)12;
66. All Marijuana Establishments shall identify and maintain Limited Access Areas in a manner where the areas are clearly identified and not easily accessible by unauthorized individuals. *See* 935 CMR 500.110(4);
67. The failure to cooperate with an inspection or investigation or otherwise comply with 935 CMR 500.301 may result in administrative or disciplinary action against the Licensee or Host Community. *See* 935 CMR 500.301(7);
68. Information provided...that is 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, constitutes full and adequate grounds for suspension or revocation of licensure. *See* 935 CMR 500.450(2);



Commission Findings

69. The Commission, through its Executive Director, and the Respondents have come to mutual agreement and understanding, and jointly propose to the Commission a resolution of the alleged violations in lieu of proceeding with an administrative hearing to determine the merits of such allegations;
70. The terms and conditions of this Order are expressly subject to ratification by the full Commission. Pursuant to G.L. c. 10, § 76, three Commissioners shall constitute a quorum and the affirmative vote of three Commissioners shall be required for ratification of this Order;
71. Respondent Licensee and Respondent Dailey neither admit nor deny the findings set forth in Paragraphs 72 through 75 inclusive of all subparagraphs;
72. Respondent Licensee did not comply with limited access area requirements under 935 CMR 500.110(4):
- a. On April 20, 2022, Commission Investigators observed open product packaging and a rosin press located in an alcove on the sales floor at the Holyoke Store;
 - b. Despite a sign on the floor stating “limited access,” the area was easily accessible by unauthorized individuals;
 - c. BBF’s floor plan does not identify the area as a Limited Access Area nor did BBF notify the Commission that this area was used for processing;
 - d. BBF did not restrict area access to employees, agents, or volunteers specifically permitted access to the area in violation of 935 CMR 500.110(4);
73. Respondent Licensee engaged in prohibited advertising practices in violation of 935 CMR 500.105(4)(b)12.:
- a. On April 20, 2022, BBF sponsored and hosted a Marijuana-themed block party in the parking lot of its corporate headquarters;
 - b. BBF participated in the block party using their own branded advertising and branded merchandise;
 - c. As event sponsors, BBF controlled access to the block party and failed to employ appropriate age verification measures;
 - d. BBF did not generate, obtain, or possess reliable audience composition data for the block party;
 - e. BBF did not employ reasonable measures to keep its advertising at the block party from reaching event attendees younger than 21 years;
 - f. BBF failed to target advertising to individuals older than 21 years of age and failing to employ reasonable safeguards to prevent advertising from reaching minors in violation of 935 CMR 500.105(4)(b)12.
74. Respondent Licensee failed to post prices and strains available for purchase in violation of 935 CMR 500.105(4)(a)6.:



- a. BBF failed to include 0.3g Marijuana pre-rolls on its catalogue or price list, even though such products were purchased by consumers and made available to the public at The Joint, in violation of 935 CMR 500.105(4)(a)6.
75. Respondent Dailey engaged in deceptive conducted in violation of 935 CMR 500.032(1)(b) and 500.301(7):
- a. Dailey made statements to Commission Investigators regarding the 0.3 gram pre-rolls labeled “Not for Retail” that were deceptive, misleading, or tended to create a misleading impressions;
 - b. Dailey mislead Commission Investigators regarding his personal knowledge of the sale of Marijuana occurring at The Joint;
 - c. Dailey was not forthcoming regarding restocking the arcade machine at The Joint with pre-rolls from BBF;
 - d. Dailey’s repeated deceptive or misleading statements to Commission Investigators in violation of 935 CMR 500.032(1)(b) and 500.301(7).

Stipulated Remedy

76. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondents further agree to the stipulated remedies and terms set forth in Paragraphs 77 through 103, inclusive of all subparagraphs;
77. Respondent Licensee agrees to pay a monetary penalty in the amount of **twenty-five thousand dollars (\$25,000.00)**, made payable by check or money order to the Cannabis Control Commission Marijuana Regulation Fund;
- a. Payment shall consist of the following installments due and payable in accordance with the following schedule; provided, however, that this schedule shall not prohibit Respondent Licensee from remitting payment in advance of the listed due dates:

Payment	Due Date
\$6,250	3 months after Commission ratification
\$6,250	6 months after Commission ratification
\$6,250	9 months after Commission ratification
\$6,250	12 months after Commission ratification

- b. If Respondent Licensee fails to timely remit any payment due in accordance with this paragraph, at the option of the Commission with notice to Respondent Licensee, the entire balance shall be due and payable within 14 days of said notice;

78. Payments shall be mailed to the following address:



- a. If via USPS:
Cannabis Control Commission
PO Box 412144
Boston, MA 02241-2144
- b. If via Courier/Overnight:
Bank of America Lockbox Services
Cannabis Control Commission 412144
MA5-527-02-07
2 Morrissey Boulevard
Dorchester, MA 02125

79. Respondent Dailey agrees to the imposition of a **14-day suspension** of his following Agent Registrations subject to the conditions of Paragraph 81:

Agent Registration	AR287654	Franklyn Dailey
Agent Registration	AR287627	Franklyn Dailey

80. Respondent Licensee agrees to the imposition of a **14-day suspension** of Sarno's Agent Registrations identified below subject to the conditions of Paragraph 81:

Agent Registration	AR287655	Carlo Sarno
Agent Registration	AR287648	Carlo Sarno

81. During the period of suspension, Respondent Dailey and Sarno shall not:
- a. Be present at Respondent Licensee's Premises;
 - b. Collect a salary or be paid by Respondent Licensee;
 - c. Work or volunteer at any Marijuana Establishment or Marijuana Treatment Center; and
 - d. Conduct any other activity that would otherwise require a valid Agent Registration.

82. Respondents shall submit to a **12-month probationary period** (the "probationary period") for its Licenses and Franklyn Dailey which will take effect on the date this Order is ratified:
- a. Any substantial noncompliance with any Commission laws by Respondents during the probationary period shall constitute full and adequate grounds for license suspension or revocation;
 - b. Prior to enforcing this provision, the department agrees to provide Respondents notice of the alleged substantial noncompliance and provide an opportunity for Respondents to correct the deficiencies;

83. Respondent Licensee shall submit a comprehensive short-term plan for facility operations during Respondent Dailey's term of suspension and Respondent Licensee's probationary period, within 10 days of the ratification of this Order. Said plan shall be approved by Respondent Licensee's assigned Investigator and address the resolution of any existing



regulatory noncompliance within 30 days of submission;

84. Paragraphs 79, 80, and 82 shall take effect upon the approval of the short-term plans provided pursuant to paragraph 83, but in no instance later than 20 days after ratification of this Order;
85. During the probationary period, Respondent Licensee agrees to the following:
- a. Respondent Licensee shall submit notice to its assigned Investigator not later than 72 hours before engaging in any Brand Name Sponsorship or Advertising, and such approval shall be deemed granted if no objection is received within 48 hours;
 - b. Restrict the use of manufacturing equipment owned by Respondent Licensee to activities permitted under applicable law;
86. Respondents shall complete the following continuing education within 3 months of ratification of this Order and provide documentation demonstrating completion of each course to the department within five days of completion:
- a. The parties shall identify a training course(s) that addresses: (i) youth prevention and advertising; and (ii) inventory management, including diversion and inversion. If the parties are unable to identify a suitable training course(s) within 3 months of the date of ratification, such deadline shall be extended for an additional 3 months. Prior to Respondent Licensee enrolling its employees in said training course(s), the department shall review and approve the course description, which approval shall not be unreasonably withheld. All Respondent Licensee's employees, including Management and Owners, shall complete said training and Respondent shall notify the Commission of the date(s) of the training; and
 - b. Respondent Dailey shall identify an ethics training course from an accredited provider and provide course information to the department for approval, which shall not be unreasonably withheld. Respondent Dailey shall complete the approved ethics training course and notify the Commission upon completion.
87. Respondents' failure to comply with the obligations under Paragraphs 77 through 86, inclusive of all subparagraphs, during the probationary period shall result in a penalty assessment in accordance with the below subparagraphs, subject to reasonable notice and opportunity to cure outlined in Paragraph 82(b). At the Commission's discretion, Respondents may be given an opportunity to resolve a defaulted obligation prior to the imposition of an automatic assessment.
- a. For defaulted obligations under Paragraphs 77 through 86, inclusive of all subparagraphs:
 - i. One thousand dollars (\$1,000.00) for the first defaulted obligation;
 - ii. Two thousand five hundred dollars (\$2,500.00) for the second defaulted obligation;
 - iii. Three thousand five hundred dollars (\$3,500.00) for third defaulted obligation; and
 - iv. Three-month suspension for all subsequent defaulted obligations.



- b. For any intentional material misrepresentation by Respondent Dailey, as determined by the Commission:
 - i. Six-month suspension of all Agent Registrations held by Franklyn Dailey for the first instance;
 - ii. Revocation of Franklyn Dailey's Agent Registrations upon any subsequent violation.
- c. Respondents agree to waive any hearing right to challenge an automatic assessment and waives their rights pursuant to Commission regulations or Massachusetts law to contest any fine or suspension imposed by this paragraph.

88. Upon receiving a demand for payment from the Commission in accordance with Paragraph 87, inclusive of subparagraph a., Respondent Licensee shall provide such payment by check or money order payable to the Cannabis Control Commission Marijuana Regulation Fund within 30 days. Payments for penalties assessed against Respondent Licensee pursuant to this Paragraph shall be mailed to the following address, as applicable:

Via USPS:

Cannabis Control Commission
PO Box 412144
Boston, MA 02241-2144

Via Courier/Overnight:

Bank of America Lockbox Services
Cannabis Control Commission 412144
MA5-527-02-07
2 Morrissey Boulevard
Dorchester, MA 02125

89. This Order may be admissible as evidence in any future hearing before the Commission or used in connection with any future licensure or administrative actions by the Commission;
90. Any issues relating to the underlying complaint and investigation that formed the basis for this Order against Respondents, and any defenses that the Respondents may have to such complaint or investigation, shall not be at issue in a proceeding against Respondents for failing to comply with the terms of this Order;
91. Respondents agree that the Commission may consider the Order, and the facts and circumstances described therein in connection with review of an application for licensure, renewal of licensure, or suitability review. Notwithstanding the foregoing, upon the Respondents' full satisfaction of the Stipulated Remedies, the Respondents shall not be subject to a Mandatory Disqualification or a Presumptive Negative Suitability Determination relative to and as a result of the specific facts and violations contained in this Order.



92. Respondents acknowledge advisement of hearing rights and process of the proceedings and wishes to resolve all issues which were the subject of the investigation or in any way related to the investigation by entering into this Order;
93. If approved by the Commission and upon execution of all parties, this Order shall have the same force and effect as an order entered after formal hearing pursuant to 935 CMR 500.500(12), except that it may not be appealed. Failure to comply with the terms of this Order, including but not limited to failure to make a timely payment in accordance with Paragraphs 77 and 88, shall constitute the basis for further administrative action against Respondents;
94. Respondents acknowledge that the Commission advised Respondents of its opportunity to consult with an attorney of their choosing and Respondents represents that they have had an opportunity to do so prior to signing the Order. Respondents acknowledge that they have been given a reasonable period of time in which to consider the terms of this Order before signing it. Respondents acknowledge and confirm that they have entered into this Order voluntarily and of their own free will, without duress or coercion, and that they are competent to enter into this Order. Respondents acknowledge that they have carefully read and fully understand the meaning and intent of this Order;
95. Respondents further understands and knowingly and voluntarily waives the following rights:
 - a. The right to proceed with the adjudicatory proceeding;
 - b. The right to cross-examine witnesses, subpoena witnesses, present evidence and testify on Respondent's own behalf at that hearing;
 - c. The right to appeal this Order.
96. Respondents consent to the terms and conditions described herein and agrees to waive its right to judicial review of this Order pursuant to G.L. c. 30A, § 14;
97. Upon execution by all parties, this Order shall represent the entire and final agreement of the parties. In the event that any provision of this Order is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of the Order shall be given full force and effect;
98. This Order shall be binding upon Respondents and shall inure to the benefit of the parties to this Order and their respective successors and assignees and shall be construed in accordance with and governed by the laws of the Commonwealth of Massachusetts. Further, in accordance with G.L. c. 94G, § 19, the Commission may record this Order, which shall then constitute a debt to the Commonwealth and shall have priority over an encumbrance recorded, registered or filed with respect to any site;



99. Upon ratification of this Order by the Commission, this Order shall become a permanent part of Respondents' record and shall be open to public inspection and disclosure pursuant to the Commission's standard policies and procedures or applicable law;

100. The Commission may reject the terms of this Order or otherwise deny ratification and entry of the Order. In such event, the terms of the Order shall be null and void, and the parties may proceed to hearing;


101. This Order may be executed by e-mail and any signature delivered by either email or first-class mail shall be deemed to be as valid as an original signature;

102. All costs and expenses incurred by Respondents to comply with this Order shall be the sole responsibility of the Respondents and shall not in any way be the obligation of the Commission; and

103. For purposes of addressing any future violations of the Order, the Commission regulations, 935 CMR 500.000, *et seq.*, shall include all later adopted regulations that are in effect at the time of the subsequent violation.

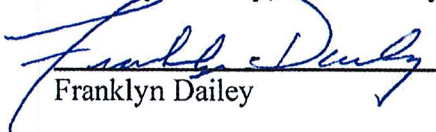
This Order is subject to ratification by the Commission. Upon ratification, this Order becomes binding on the Parties. Failure to comply with the above conditions shall result in administrative action against Respondents up to and including suspension and/or revocation of registration.

Boston Bud Factory, Inc.


Boston Bud Factory, Inc.

4-6-26
Date Signed


Franklyn Dailey, Individually


Franklyn Dailey

4-6-26
Date Signed

Ratified by Commission vote (4 yes, 0 no, 0 abstain) on April 7, 2026.

Commonwealth of Massachusetts Cannabis Control Commission


Travis Ahern, Executive Director

4/7/26
Date Signed

