Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

8/25 Public Meeting Book - Cannabis Control Commission Public Meeting

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935_CMR_501_Redline_Ch65

New Business Not Anticipated at the Time of Posting

Next Meeting Date & Adjournment

20260917 PPT

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

September 14, 2026

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and Chapter 2 of the Acts of 2023, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

September 17, 2026
10:00 AM

Remote via Microsoft Teams* and In-Person at Cannabis Control Commission,
Second Floor Public Meeting Room, Worcester Union Station, 2 Washington Square, Worcester

PUBLIC MEETING AGENDA

I. Call to Order
II. Commissioners' Comments & Updates
III. Minutes
    1. July 30, 2026
IV. Executive Director and Commission Staff Report
    1. Social Consumption Regulation Implementation
    2. Licensing Data Updates
V. Staff Recommendations on Changes of Ownership
    1. Leaf Joy, Inc.
    2. Mint Retail Facilities, LLC
    3. PharmaCannis Massachusetts, Inc.
    4. PharmaCannis Massachusetts Inc.
VI. Staff Recommendations on Final Licenses
    1. Apotho Therapeutics Dartmouth Manufacturing, Inc. (#MP282262), Product Manufacturer
    2. DEO Enterprises Inc. (#MT281737), Marijuana Transporter
    3. Greenjeans Farms, LLC (#CO281706), Craft Cooperative – Tier 2 Outdoor
    4. Hatfield Farmacy, LLC (#MC284014), Cultivator – Tier 11 Outdoor
    5. Legal Greens Boston, LLC (#DOA100194), Delivery Courier
    6. Legal Greens Boston, LLC (#MR285427), Retailer
VII. Staff Recommendations on Provisional Licenses

1. Middlesex Integrative Medicine (#MRN285251), Retailer
2. Wonderland Dispensary & Delivery, Inc. (#MDA1349), Delivery Operator

VIII. Staff Recommendations on Responsible Vendor Training
1. Driver Course Platform LLC

IX. Enforcement Actions
1. Stipulated Agreements
i. Herbal Pathways LLC
ii. Smokey Leaf LLC

X. Hearing Officer Recommended Decisions
1. Discern'd Cannabis Purveyors, Inc.

XI. Commission Discussion and Votes
1. Delivery of Memorandum on State-by-State Review of Cultivation Moratoria
2. Chapter 65 Fall Regulatory Round Policy Discussion

XII. New Business Not Anticipated at the Time of Posting

XIII. Next Meeting Date

XIV. 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
COMMONWEALTH OF MASSACHUSETTS

CANNABIS CONTROL COMMISSION

July 30, 2026
10:00 AM

Remote via Microsoft Teams* and In-Person at Cannabis Control Commission, *Second Floor Public Meeting Room, Worcester Union Station, 2 Washington Square, Worcester*

PUBLIC HEARING MINUTES

Documents:

- June 18, 2026, 935 Code Mass. Regs. § 500.000 Draft Chapter 65 Emergency Regulations.
- June 18, 2026, 935 Code Mass. Regs. § 501.000 Draft Chapter 65 Emergency Regulations.

In Attendance:

- Chair Christopher Harding
- Commissioner Xiomara DeLobato
- Commissioner Anthony Wilson

Minutes:

I. Call to Order

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

II. Public Hearing on Chapter 65 of the Acts of 2026 Emergency Regulations – 00:01:25

- Chief of Staff Andrew Carter (Chief Carter) gave an overview of the rules of conduct and how to submit written comments as well as sign up to testify. He also provided an overview of how the meeting would be managed. The Chair noted if any of the Commissioners had clarifying questions they would be recognized by Chief Carter.

- The Commission took a brief recess returning at 10:20 AM. (Returned at 00:16:33.)

- The first speaker was Kevin Gilnack from Equitable Opportunities Now (EON). He noted he would submit detailed written comments signed by more than thirty industry leaders and advocates. He spoke about ownership limits and noted EON also had a signed letter by more than sixty industry leaders and advocates opposing any

expansion and supporting the preservation of the three ownership and 10% limits. He added that at the Joint Committee on Cannabis Policy Hearing opposition outnumbered supporters. He explained three essential asks that would be outlined in the written letter he would submit to safeguard equity and competition as the new law was implemented. First, to require equity and competition review for any fourth, fifth or sixth retail License to evaluate market concentration, local conditions and proximity to social equity businesses as well as overlapping investors and related parties to ensure that any acquisition of the Licenses would not negatively impact the mission to advance equable participation. Second, require meaningful disclosure and cross-License review of investors, lenders, beneficial owners, controlling rights, and material financial and operational agreements, including purchasing agreements, managed services agreements and leases that may convey opportunities to extract profits or exercise control that is not fully captured in the statement of someone's equity ownership. Third, make the sixth License exclusivity period outcome based and that a 12-month deadline should be the floor. He urged to keep any sixth License exclusive until at least three independent social equity businesses receive that sixth License and provide twelve additional months of exclusivity. He added that at a minimum, non-equity operators should remain ineligible until both the statutory 12-month period was passed and until three social equity businesses had taken advantage of it to ensure that the opportunity that was contemplated by the legislature was meaningful. He emphasized that Chapter 65 was a significant change in the market and the Commission had an important opportunity to make sure that additional access to capital did not lead to accelerated consolidation and control or predatory financing.

- The next speaker was Darnisha Cohen from SAFE-LYFE LLC. She shared that she had been a social equity member since 2021 and that her journey to receive commence operations with her Courier License had been long. She mentioned that she originally tried to get a Delivery Operator License back in 2022 and that she had paid to lease a property for a year to be told at the end of the lease, the town would not give her a Host Community Agreement (HCA). She provided background of the long expensive journey to get operational and survive. She asked the Commission for an extension with exclusivity with the licensure to be viable in the space as a small business owner. She echoed Kevin Gilnack on the different policies and moving them forward when it came to the Cannabis businesses with social equity. The Chair asked where she was in the process currently and Ms. Cohen explained she was trying to find a retail space and that it had been very hard to get retailers to partner with social equity members, leaving her in a waiting phase.
- The next speaker was Tremana White. She noted her background in economics and stated that the increase in access to capital across the industry could be a real win, but the same law was also raising ownership threshold. She expressed the desire for the state to represent its citizens and not corporations. She explained five concrete steps. First, the review of the fourth, fifth and sixth retail Licenses specifically for their effects on equity and competition, not just capital access. She noted that more Licenses in fewer hands was not progress. Second, requiring real transparency about investors and financial arrangements, especially now that the ownership threshold had

moved to 20%. She mentioned if it was unknown who was behind the business, it was impossible to know whether ownership was genuine. Third, conduct a strong ownership and control audit so the state had an accurate picture of who held power in the industry before the new threshold got tested at scale. Fourth, implement a protected anonymous compliant portal so social equity Licenses and workers can raise concerns about hidden control or arrangements without fear of retaliation. Lastly, support jobs, procurement from equity businesses, reinvestment and public data reporting so it can be measured when equity was happening and not assume it was. She noted that Massachusetts had the chance to expand the market responsibly or to repeat the mistakes that had left consolidation unchecked until it was too late or too late to reverse.

- The next speaker was Michael Marinaro from Bada Bloom Inc. He congratulated the new board and noted he had been a social equity applicant for five years and still not operational. He shared he was in favor of increasing the purchase limits but needed the Commission to be looking forward to helping social equity. He explained he raised millions of dollars and was still not operational. The Chair asked where he was currently in the process and Mr. Marinaro responded that he needed more money. He also stated that large companies had made it almost impossible and the market was dead with no capital. He added they should not have to pay licensing fees and renewals for operations that were not operational.
- The next speaker was Lucas Thayer from Apple Guy Flowers. He congratulated the new board and stated he looked forward to meeting them in person. He noted he was in agreement with Kevin Gilnack and his extreme opposition to the License cap increase. He stated he held a Provisional License since 2023 and had been paying renewal fees year after year for a Provisional License that had stayed provisional for a long time. He mentioned the grant program needed serious reform, adjustment and increased funding. He noted the disadvantage in the ability to seek funding for their businesses. He applauded one aspect of the recent law passed by the legislature and policy implemented by the Commission regarding the possession limit increase and purchase limit increase from one ounce to two ounces. He added he believed it could increase further and used a liquor store as an example of nonexistent purchase limits. He also mentioned that concentrate limits should be increased. He shared that the License cap increase allowed big businesses to get bigger while social equity operators were left behind in the dust. He added it needed more oversight and rethinking and was a mistake on the part of the legislature. He explained that it should be exclusive to social equity operators for perpetuity and that no social equity operator would have enough money to open six stores unless the state helped in a more meaningful way. He noted the Massachusetts Cannabis Reform Coalition was hosting an event called the Boston Freedom Rally in September.

- The Commission took a brief recess returning at 10:50 AM (Returned at 00:46:44.)

- The last speaker was Ryan Dominguez from the Massachusetts Cannabis Coalition (MCC). He noted the MCC was grateful for the efficiency in the emergency regulations that had been pushed forward. He added that with the April 19th purchase limit increase and the emergency regulations that had been submitted, they were already seeing impact. He mentioned there was a lot of interest in Massachusetts again from investors and bankers who saw new opportunities due to the increased retail License cap as well as equity joint venture percentage. He mentioned that they did push both topics as part of their legislative agenda. He shared a lot of that their push was based off conversations across the industry and for operators who were struggling to keep their doors open. He also mentioned that access to capital was one of the hardest things and explained their background into the policies they were pushing forth. He mentioned the opportunity for mergers within businesses and becoming more financially viable to be able to compete with some of the vertically integrated operators. He discussed the determination around a person or entity having Direct or Indirect Control specifically when it related to the 20% increase in equity joint ventures. He stated that the Commission had pointed to a definition within the statute around a controlling person and that he did not think that was the intent of the legislature. He explained his interpretation of the legislative intent. Lastly, he spoke on the purchase limit increase, and that they did need to look at dosing when it came to purchase limits, like beverages and edibles for example.
- Chief Carter encouraged anyone who could not attend to submit written testimony regarding the draft Chapter 65 emergency regulations by 5:00 PM and also any of the speakers who testified to follow up on their testimony and submit their testimony in writing. Chief Carter and the Chair thanked everyone for participating.

III. Next Meeting Date – 00:57:38
- The next meeting was scheduled for August 13, 2026.

IV. Adjournment – 00:57:48
- The Chair stated the meeting was adjourned.

Social Consumption Regulatory Implementation Project

Project Status Updates: January – September 2026

Project Management Planning

- Finalized charters, established governance, and developed planning tools and project documents
- Launched collaboration sites and established access permissions
- Conducted 4 individual working group kick-off meetings and initiated deliverable planning
- Prioritized deliverables, identified dependencies and risks, and established work sequence
- Established recurring collaboration meeting cadence
- Prepared stakeholder engagement approach.

Detailed Deliverable Planning

- Conducted detailed planning sessions for priority deliverables across all 4 working groups
- Developed process maps and operational workflows to support implementation
- Transitioned from 4 independent working groups to 1 collaborative project structure
- Produced recurring project reporting and public meeting materials
- Planned public education, communications, local advisory, and stakeholder engagement activities
- Reassessed deliverables and refined sequencing to focus resources on priority work

Project Execution & Implementation Readiness

- Facilitate project strategy sessions to align and plan implementation milestones
- Launched electronic municipality out-in form
- Incorporated EPCO requirements to project
- Finalized Consumer Education rack card
- Met with Local Advisory group external stakeholders
- Scheduled 2nd external stakeholder engagement meeting for Local Advisory group
- Scheduled Public Education external engagement
- Published RFQ for Public Education procurement
- Scoping automation for Municipal tracker
- Reviewing existing operational processes and documentation to incorporate social consumption
- Incorporating ‘shelf stable food’ and ‘reporting requirements’ to project scope

- Responsible Vendor Training – Application live
  - Facilitated external stakeholder meetings to develop Social Consumption curriculum
  - Developed Trainer application and internal review checklist
  - Updated public-facing website content
  - Defined future-state RVT operational processes and improvement opportunities
  - Launched RVT Trainer Application
  - Finalized RVT Trainer Renewal Application
  - Finalized RVT Trainer audit process

- Supplemental License
  - Developed license format, application materials, and system requirements aligned with existing licensing processes.
  - Defined automation needs and assessed implementation timelines
  - Finalized Model HCA template

  - Updating HCA guidance documents
  - Finalized license application and internal review checklist
  - Built Supplemental License inspection framework, including scheduling procedures, operational requirements, safety considerations, and supporting resources.
  - Creating HR policy for off-hours inspection activities

- Hospitality License
  - Scope planning scheduled

- Marijuana Event Organizer License
  - Held compliance and enforcement review meeting to discuss requirements

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Leaf Joy, Inc.
0361-COO-03-0626

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Leaf Joy, Inc.
Licensee d/b/a Name:	N/A
Establishment Address:	1 Main Road, Gill, MA 01354
SEP or EEA?	No

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

License Number	License Type
MR284606	Marijuana Retailer

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

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Grigori Faiziev	Person with Direct or Indirect Control	90.01%	90.01%
Kathleen McMahon	Person with Direct or Indirect Control	9.99%	9.99%

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
N/A	N/A	N/A	N/A

6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Arthur Becker	Person with Direct or Indirect Control	40%
Matthew Richman	Person with Direct or Indirect Control	0%
Alan Kanders	Person with Direct or Indirect Control	25%
Raviraj Dave	Person with Direct or Indirect Control	25%

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
Mello Gill, LLC	Entity with Direct or Indirect Control	100%

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

9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.

10. The following party(ies) hold ownership interests in the license(s) listed below:

Individual	Name of Establishment	License Number	License Type	Ownership Percentage	Control Percentage
Arthur Becker	Mellow Fellows LLC	MR281811	Retailer	0%	44.35%
Arthur Becker	Jamaco, LLC	MC282136	Cultivator	63.95%	44.35%
Matthew Richman	Jamaco, LLC	MC282136	Cultivator	0%	20%
Alan Kanders	Mellow Fellows LLC	MR281811	Retailer	0%	26.65%
Alan Kanders	Jamaco, LLC	MC282136	Cultivator	25.65%	25.65%
Raviraj Dave	Mellow Fellows LLC	MR281811	Retailer	0%	20%

11. 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Mint Retail Facilities, LLC
0356-COO-03-0526

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Mint Retail Facilities, LLC
Licensee d/b/a Name:	N/A
Establishment Address:	768 Pleasant Street, Belmont, MA 02478
SEP or EEA?	No

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

License Number	License Type
MR283295	Marijuana Retailer

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

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Eivan Shahara	Person with Direct or Indirect Control	95%	95%
Blake Mensing	Person with Direct or Indirect Control	5%	5%

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
N/A	N/A	N/A	N/A

6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Hardik Patel	Person with Direct or Indirect Control	23%
Matthew O'Brien	Person with Direct or Indirect Control	23%
Kayla Correa	Person with Direct or Indirect Control	10.99%
Michael Kinahan	Person with Direct or Indirect Control	10.99%
Anthony Kinahan	Person with Direct or Indirect Control	10.99%

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
Clover Partners, LLC	Entity with Direct or Indirect Control	100%

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

9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.

10. The following party(ies) hold ownership interests in the license(s) listed below:

Individual	Name of Establishment	License Number	License Type	Ownership Percentage	Control Percentage
Kayla Correa	Tower Three, LLC	MP281783	Product Manufacturer	24.5%	24.5%
Kayla Correa	Tower Three, LLC	MC281652	Cultivator	24.5%	24.5%
Anthony Kinahan	Tower Three, LLC	MP281783	Product Manufacturer	24.5%	24.5%
Anthony Kinahan	Tower Three, LLC	MC281652	Cultivator	24.5%	24.5%
Michael Kinahan	Tower Three, LLC	MP281783	Product Manufacturer	51%	51%
Michael Kinahan	Tower Three, LLC	MC281652	Cultivator	51%	51%

11. 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

PharmaCannis Massachusetts, Inc.
0363-COO-03-0626

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	PharmaCannis Massachusetts, Inc.
Licensee d/b/a Name:	Verilife
Establishment Address:	939 Boston Turnpike, MA, Shrewsbury 01545
SEP or EEA?	No

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

License Number	License Type
MR282298	Marijuana Retailer

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

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Stephen Schuler	Person with Direct or Indirect Control	11.66	11.66
Michelle Stormo	Person with Direct or Indirect Control	.03	.03
John Lord	Person with Direct or Indirect Control	26.79	26.79
Mackenzie Wilcox	Person with Direct or Indirect Control	0	0
John McCarthy	Person with Direct or Indirect Control	0	0
Aron Schwartz	Person with Direct or Indirect Control	0	14

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
PharmaCann LLC	Entity with Direct or Indirect Control	100	100

Illinois MedTech, LLC	Entity with Direct or Indirect Control	14.12	14
PharmaCann Mass, LLC	Entity with Direct or Indirect Control	100	0

6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Meredith Moghimi	Person with Direct or Indirect Control	100

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
MiLou Wareham, LLC	Entity with Direct or Indirect Control	100
MiLou MA, LLC	Entity with Direct or Indirect Control	100
MiLou Holdings, LLC	Entity with Direct or Indirect Control	100

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

9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.

10. The proposed parties do not hold any ownership or control interests in any other Commission-issued licenses.

11. 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Pharmacannis Massachusetts Inc.
0362-COO-03-0626

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Pharmacannis Massachusetts Inc.
Licensee d/b/a Name:	Veri Life
Establishment Address:	112 Main Street, Wareham, MA 02571
SEP or EEA?	No

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

License Number	License Type
MR281252	Marijuana Retailer

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

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Michelle Stormo	Person with Direct or Indirect Control	.03	.03
Stephen Schuler	Person with Direct or Indirect Control	11.66	11.66
John Lord	Person with Direct or Indirect Control	26.79	26.79
Mackenzie Wilcox	Person with Direct or Indirect Control	0	0
John McCarthy	Person with Direct or Indirect Control	0	0
Aron Schwartz	Person with Direct or Indirect Control	0	14

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
Pharmacann LLC	Entity with Direct or Indirect Control	100	100

Pharmacann Mass, LLC	Entity with Direct or Indirect Control	0	0
Illinois MedTech, LLC	Entity with Direct or Indirect Control	14.12	14

6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Meredith Moghimi	Person with Direct or Indirect Control	100

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
MiLou Wareham, LLC	Entity with Direct or Indirect Control	100
MiLou MA, LLC	Entity with Direct or Indirect Control	100
MiLou Holdings, LLC	Entity with Direct or Indirect Control	100

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

9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.

10. The proposed parties do not hold any ownership or control interests in any other Commission-issued licenses.

11. 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.

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Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Apotho Therapeutics Dartmouth Manufacturing, Inc.

MP282262

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Apotho Therapeutics Dartmouth Manufacturing, Inc.
Licensed Location:	757 State Road, Dartmouth, MA 02747

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 and associated owners are associated with the following license type(s):

Business Name	Type	Status	Location
Apotho Therapeutics Athol, Inc. (MC281370)	Marijuana Cultivator, Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Commence Operations	Athol
Apotho Therapeutics Dartmouth INC (MR283521)	Marijuana Retail	Commence Operations	Dartmouth
Apotho Therapeutics Dartmouth Manufacturing, Inc. (MC283298)	Marijuana Cultivator, Tier 2/Indoor 5,001 – 10,000 sq. ft.)	Final License	Dartmouth
Apotho Therapeutics Plainville, LLC (MR282388)	Marijuana Retail	Commence Operations	Plainville

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Mathew Medeiros	Person Having Direct/Indirect Control / Capital Contributor	0%	25%
Andrew Medeiros	Person Having Direct/Indirect Control / Capital Contributor	0%	25%
Lauren Forster	Close Associate		
Edward Mediros	Close Associate		
Elisa Medeiros	Close Associate		

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Medeiros Investment Irrevocable Trust	Entity Having Direct/Indirect Control / Capital Contributor	50%	100%

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 16, 2026.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): July 13, 2026.

11. 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.

12. 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.

13. 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

DEO Enterprises, Inc.

MT281737

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	DEO Enterprises, Inc.
Licensed Location:	90 Conz St., Suite 219K, Northampton, MA 01062

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

License Type(s) Sought:
Marijuana Third Party Transporter

3. The licensee and associated owners are associated with the following license type(s):

Business Name	Type	Status	Location
Green Flash Delivery, LLC (MDA1298)	Marijuana Delivery Operator	Commence Operations	Boston

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Duane Osborn	Person Having Direct/Indirect Control / Capital Contributor	100%	100%

5. List of all required entities and their roles:

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

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 10, 2025.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): June 25, 2025.

11. 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.

12. 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.

13. 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 possess and otherwise acquire marijuana but shall not transport marijuana to other Marijuana Establishments or Medical Marijuana Treatment Centers, 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Greenjeans Farms, LLC

CO281706

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Greenjeans Farms, LLC
Licensed Location:	149 Christian Lane, Whately, MA 01373

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

License Type(s) Sought:
Craft Marijuana Cooperative, Tier 2, Outdoor (5,001– 10,000 sq. ft.)

3. The licensee and associated owners are associated with the following license type(s):

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

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Julie Beauchemin	Person Having Direct/Indirect Control	90%	50%
Robert Beauchemin	Person Having Direct/Indirect Control	10%	33.3%
Scott Hutkoski	Person Having Direct/Indirect Control	0%	16.7%

5. List of all required entities and their roles:

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

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on March 10, 2022.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): July 24, 2026.

11. 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.

12. 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.

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

    a. Security

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

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

    b. Inventory and Storage

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

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

    c. Cultivation Operation

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

    i. Seed-to-sale tracking;

ii. Compliance with applicable pesticide laws and regulations; and
iii. Best practices to limit contamination.

Not applicable.

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

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

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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Hatfield Farmacy, LLC

MC284014

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Hatfield Farmacy, LLC
Licensed Location:	140A North Hatfield Rd., Hatfield, MA 01038

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

License Type(s) Sought:
Marijuana Cultivator, Tier 11, Outdoor, (90,000 – 100,000 sq. ft.)

3. The licensee and associated owners are associated with the following license type(s):

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

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Jessica Manganello	Person Having Direct/Indirect	100%	100%

5. List of all required entities and their roles:

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

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on May 28, 2026.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): August 18, 2026.

11. 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.

12. 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.

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

    a. Security

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

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

    b. Inventory and Storage

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

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

    c. Cultivation Operation

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

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

d. Transportation

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

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

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

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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Legal Greens Boston, LLC

DOA100194

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Legal Greens Boston, LLC
Licensed Location:	571 B Washington Street, Boston, MA 02124

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

License Type(s) Sought:
Marijuana Courier

3. The licensee and associated owners are associated with the following license type(s):

Business Name	Type	Status	Location
Legal Greens, LLC	Marijuana Cultivator, Tier 1/Indoor (up to 5,000 sq. ft.)	Provisional License	Brockton
Legal Greens, LLC	Marijuana Retail	Commence Operations	Brockton
Legal Greens Boston, LLC	Marijuana Delivery Operator	Provisional License	Boston
Legal Greens Boston, LLC	Marijuana Retail	Provisional License	Boston

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Vanessa Jean-Baptiste	Person Having Direct/Indirect Control / Capital Contributor	51%	51%
Mark Bouquet	Person Having Direct/Indirect Control / Capital Contributor	40%	40%
Michael Maloney	Person Having Direct/Indirect Control / Capital Contributor	9%	6%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Legal Greens, LLC	Entity Having Direct/Indirect Control / Capital Contributor	100%	100%

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 9, 2026.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): August 5, 2026.

11. 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.

12. 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.

13. 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 shall not deliver marijuana to consumers, patients, or caregivers, 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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Legal Greens Boston, LLC

MR285427

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Legal Greens Boston, LLC
Licensed Location:	571 B Washington Street, Boston, MA 02124

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

License Type(s) Sought:
Marijuana Retailer

3. The licensee and associated owners are associated with the following license type(s):

Business Name	Type	Status	Location
Legal Greens, LLC	Marijuana Cultivator, Tier 1/Indoor (up to 5,000 sq. ft.)	Provisional License	Brockton
Legal Greens, LLC	Marijuana Retail	Commence Operations	Brockton
Legal Greens Boston, LLC	Marijuana Delivery Operator	Provisional License	Boston
Legal Greens Boston, LLC	Marijuana Courier	Provisional License	Boston

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Vanessa Jean-Baptiste	Person Having Direct/Indirect Control / Capital Contributor	51%	51%
Mark Bouquet	Person Having Direct/Indirect Control / Capital Contributor	40%	40%
Michael Maloney	Person Having Direct/Indirect Control / Capital Contributor	9%	6%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Legal Greens, LLC	Entity Having Direct/Indirect Control / Capital Contributor	100%	100%

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 9, 2026.

7. The licensee has paid all applicable license fees.

8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

9. 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

10. Commission staff inspected the licensee's facility on the following date(s): August 5, 2026.

11. 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.

12. 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.

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

    a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

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

d. Transportation

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

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

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

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

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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Middlesex Integrative Medicine, Inc.

MRN285251

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Middlesex Integrative Medicine, Inc.
Proposed Location:	76 Astor Avenue, Norwood, MA 023062

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

License Type(s) Sought:
Marijuana Retailer

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

Type	Status	Location
Solurge, Inc. (MC281300) Tier 3/Indoor (10,001 – 20,000 sq.ft.)	Commence Operations	Holyoke
Solurge, Inc. (MR282372)	Commence Operations	Holyoke
Middlesex Integrative Medicine, Inc. (RMD1025)	Commence Operations	Leominster-Norwood

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
John Engel	Receiver	100%	100%

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:

   MTC Priority

7. The license applicant and host community executed a Host Community Agreement ("HCA") on October 11, 2024. 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 29, 2026, 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 proposed hiring 25% of individuals from the following Commission identified Areas of Disproportionate Impact: Abington, Braintree, Brockton, Mansfield, Quincy, Randolph, Taunton, and Walpool and 5% of individuals that are MA Residents with Past Drug Convictions, and/or MA Residents with Parents or Spouses with Past Drug Convictions.
2	The license applicant proposed to donate $1,500 to St. Francis House.

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 proposed to hire the following: 50% Women, 33% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 5% Persons with Disabilities, and 5% LGBTQ+ People.
2	The license applicant proposed to contract with 20% of businesses that are majority owned by Women, People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, Veterans, Persons with Disabilities, and LGBTQ+ -owned businesses.

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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Wonderland Dispensary & Delivery, Inc.

MDA1349

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Wonderland Dispensary & Delivery, Inc.
Proposed Location:	86 #1 Kirkland St, Cambridge, MA 02138

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

License Type(s) Sought:
Marijuana Delivery Operator

3. The licensee and associated owners are associated with the following license type(s):

Type	Status	Location
Wonderland Dispensary & Delivery, Inc. (MR285154)	Provisional License	Cambridge

4. The license applicant was pre-certified by the Commission on June 4, 2026. Pursuant to 935 CMR 500.101(2)(b)(2), the applicant demonstrated a propensity to successfully operate a license.

5. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Steven Demarco	Person Having Direct/Indirect Control / Capital Contributor	100%	100%

6. List of all required entities and their roles:

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

7. License Applicant's Status:

   Expedited Applicant (Social Equity Program Participant)
   Steven Demarco / 100% / SE305198)

8. The license applicant and host community executed a Host Community Agreement ("HCA") on March 17, 2026. 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.

9. The Commission received a municipal response from the host community on August 26, 2026 stating the applicant was in compliance with all local ordinances or by-laws.

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

#	Goal
1	The license applicant proposes to hire 51% of individuals from the following Commission identified Areas of Disproportionate Impact: Census tracts of Boston and Worcester and MA Residents with Past Drug Convictions, and/or MA Residents with Parents or Spouses with Past Drug Convictions].
2	The license applicant proposed to provide a structured mentorship for SEPs.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The 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.

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

#	Goal
1	The license applicant proposed to hire the following: 30% Women, 25% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 15% LGBTQ+ People.

2	The license applicant proposed to prioritize purchasing from companies that are 5% Women, 5% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 5% Veterans, 5% Persons with Disabilities, and 5% LGBTQ+ People.

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.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Driver Course Platform LLC d/b/a National Course Portal

RVN454358

RESPONSIBLE VENDOR TRAINING ("RVT") APPLICANT SUMMARY

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

Item	Information
RVT Applicant Name	Driver Course Platform LLC
RVT Applicant d/b/a Name	National Course Portal
RVT Address	775 Red Hill Rd Fairfield, VA 24435
RVT Business Phone Number	703-574-0146
RVT Business Email Address	admin@nationalcourseportal.com
RVT Business Website	https://nationalcourseportal.com

2. The RVT applicant has applied to provide a training program for the Basic Core Curriculum.

3. No owner, manager, or employee of the RVT applicant is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individual	Role
Ankur Fadia	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:
   a. Verify the identification and certify completion of the 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. 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 Control Commission
COMMONWEALTH OF MASSACHUSETTS

Herbal Pathways, LLC d/b/a HiBrid
1317 East Street
Pittsfield, MA 01201
MR282037

Case No. ENF-2025-0000001875

FINAL ORDER AND STIPULATED AGREEMENT

This Final Order and Stipulated Agreement ("Agreement") is between the Commonwealth of Massachusetts Cannabis Control Commission ("Commission") and Herbal Pathways, LLC d/b/a HiBrid ("Respondent") (together with the Commission, collectively, "the Parties").

This Agreement is offered for the purposes of settlement to resolve the Order to Show Cause issued on May 4, 2026 ("Order to Show Cause"). The Commission finds that the resolution of this matter serves the purposes of G.L. c. 94G and 935 CMR 500.000 ("Commission Law") because Respondent has cooperated with the Commission since being issued the Order to Show Cause.

Accordingly, the Parties stipulate to the following Facts of Record, Applicable Law, and Findings as presented in this Agreement. Respondent voluntarily agrees to the stipulated remedy contained in Paragraphs 35 through 57. Following the ratification of this Agreement by majority vote of the Commission, this Agreement is binding on the Parties for the purpose of reaching a final resolution.

Legislative, Statutory, and Regulatory Authority

1. The Commission is charged with the administration and enforcement of laws regulating and licensing adult-use Marijuana Establishments and maintains jurisdiction over the conduct of licensed Marijuana Establishments, including their compliance with the Commonwealth's marijuana laws, G.L. c. 94G, and regulations, 935 CMR 500.000 *et seq*. *See* G.L. c. 94G, § 4(a), (a½);

2. The Commission possesses all the powers necessary or convenient to carry out and effectuate its purposes including, but not limited to:
    a. The power to fine a person licensed for any cause that the Commission deems reasonable, including a violation of G.L. c. 94G or any regulation promulgated by the Commission. G.L. c. 94G, § 4(a)(xiii), (xxii);
    b. The power to gather facts and information applicable to the Commission's obligation to suspend or revoke licenses for a violation of G.L. c. 94G, or any regulation adopted by the Commission. G.L. c. 94G, § 4(a)(xiv);

3. The Commission also has the power to promulgate regulations and to adopt, amend, or repeal regulations for the implementation, administration, and enforcement of G.L. c. 94G. *See* G.L. c. 94G, § 4(a)(xxiv), (xxviii);

4. Accordingly, the Commission has adopted regulations for the administration, clarification and enforcement of laws regulating Marijuana Establishments, including 935 CMR 500.360, which provides that the Commission "may issue an order to a Licensee 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, including M.G.L. c. 94G, and 935 CMR 500.000";

5. Pursuant to that regulatory provision, the Commission may assess an administrative fine of up to $50,000 for each violation, or an order for corrective action setting a reasonable time for correction of the violation, or both. 935 CMR 500.360(2);

6. Each day during which a violation continues may constitute a separate offense, and each instance and provision of the state Marijuana laws that is violated may constitute a separate violation. 935 CMR 500.360(2)(b);

7. In determining the amount of a fine or financial penalty to impose, the Commission or a Commission Delegee may consider a greater or lesser amount depending on aggravating or mitigating circumstances identified by the agency. 935 CMR 500.360(3);

8. At any time, the Commission or a Commission Delegee may, in its discretion, review, approve or reject an informal disposition, but only on a showing that the alleged violations have been corrected, and a submission of a written waiver of its right to judicial review. *See* 935 CMR 500.500(7); *see also* G.L. c. 30A, § 10 (agencies have the authority to make information dispositions by stipulation or settlement);

Facts of Record

9. Respondent is a Marijuana Retail Establishment, License No. MR282037, located in Pittsfield, Massachusetts;

10. Respondent received its final license on September 17, 2021, and commenced operations on October 19, 2021;

11. Independent Testing Laboratories ("ITLs") test Marijuana for the Cannabinoid Profile and for contaminants as specified by the Commission (*i.e.*, the dry-weight percentage of delta-nine-tetrahydrocannabinol, cannabidiol, tetrahydrocannabinolic acid and cannabidiolic acid) before it is sold;

12. ITLs report the results of these tests in Metrc, the Commonwealth's designated Seed-to-sale Electronic Tracking System;

13. The results are associated with all Marijuana sampled in a test package and certain Marijuana Products derived therefrom;

14. Licensees can see these reported testing results in Metrc;

15. Licensees can determine a product's expiration date in Metrc by referencing its testing date or other expiration indicators, such as the expiration date columns;

16. The date of testing and expiration date are also included on the product packaging;

17. On November 9, 2023, Investigators audited Respondent virtually through Metrc;

18. Investigators identified five packages of expired products that Respondent failed to separate from its active virtual inventory;

19. On November 28, 2023, Investigators issued Respondent a Notice of Deficiency ("NOD") citing their findings from the audit;

20. Respondent submitted a Plan of Correction ("POC") on December 8, 2023, stating, in relevant part, that "expired products have been removed from the virtual inventory and transferred to the waste";

21. On January 24, 2024, Investigators audited Respondent again through Metrc;

22. Investigators discovered that five packages of expired products appeared in Respondent's active virtual inventory, including four that Respondent claimed to have removed and wasted in its POC from December 8, 2023;

23. On February 16, 2024, Investigators issued Respondent another NOD citing these findings;

24. On November 5, 2024, Metrc began compiling a daily report of all Licensees' expired product transactions from the previous day ("Expired Product Reports");

25. The Expired Product Reports show Respondent sold eight expired Marijuana Pre-Rolls to Consumers between November 4, 2024, and November 11, 2024: two on November 4, 2024, two on November 6, 2024, one on November 8, 2024, two on November 10, 2024, and one on November 11, 2024;

26. Another Expired Product Report shows Respondent sold one expired Infused Edible to a Consumer on March 29, 2025;

27. A separate Expired Product Report shows Respondent sold one expired Infused Edible to a Consumer on July 16, 2025;

Applicable Law

28. Marijuana or Marijuana Products with testing dates exceeding one year shall be deemed expired and may not be dispensed, sold, Transferred, or otherwise conveyed until retested. *See* 935 CMR 500.160(5);

29. Failure to submit a plan of correction as required or to implement the plan as submitted pursuant to 935 CMR 500.320 is full and adequate grounds for revocation of a Marijuana Establishment's license. *See* 935 CMR 500.450(4);

Stipulated Findings

30. The Commission, through its Executive Director, and Respondent 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. The terms and conditions of this Agreement are expressly subject to ratification by the full Commission. Pursuant to G.L. c. 6, § 223(e) as amended by St. 2026 c. 65, § 1, two Commissioners shall constitute a quorum, and the affirmative vote of two Commissioners shall be required for ratification of this Agreement;

31. Respondent's actions described in Paragraphs 17 through 22 amounted to failure to implement a plan of correction as submitted in violation of 935 CMR 500.450(4);
    a. On November 28, 2023, the Commission issued Respondent an NOD identifying five packages of expired products in its active virtual inventory;
    b. On December 8, 2023, Respondent submitted a POC stating, in relevant part, that "expired products have been removed from the virtual inventory and transferred to the waste";
    c. Investigators audited Respondent again on January 24, 2024;
    d. Investigators discovered that four of the five packages of expired products cited in the November 28, 2023, NOD, still appeared in Respondent's active virtual inventory during the audit on January 24, 2024;
    e. Respondent did not implement its December 8, 2023, POC as submitted because it did not remove the expired products discovered during the first audit from its active virtual inventory after saying it did;
    f. Respondent's failure to implement the POC as submitted violated 935 CMR 500.450(4);

32. Respondent's actions described in Paragraphs 25 through 27 amounted to selling expired product in violation of 935 CMR 500.160(5);
    a. Between November 4, 2024, and July 16, 2025, Respondent sold 10 products to Consumers with test results exceeding one year;
    b. Respondent violated 935 CMR 500.160(5) 10 times by selling these expired products to Consumers;

33. Respondent has cooperated with Commission staff since the Commission's issuance of the Order to Show Cause;

Stipulated Remedy

34. In lieu of proceeding with an administrative hearing and subsequent proceedings, the Parties agree to the terms and conditions set forth in Paragraphs 35 through 57, inclusive of all subparagraphs;

35. Respondent agrees to pay a negotiated monetary penalty in the amount of **Fifteen Thousand Dollars ($15,000.00)** made payable by check or money order to the order of the Cannabis Control Commission Marijuana Regulation Fund;
    a. Payment shall consist of the following installments due and payable in accordance with the following schedule, however Respondent may pay more than the specified amount if they are able:

Payment	Due Date
$7,500	60 days after the ratification of this Agreement by the Commission
$7,500	On or before July 9, 2027

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

36. Payment shall be postmarked on or before the due dates identified in Paragraph 35.a. and be mailed to the following address:
    a. Via USPS:
        Cannabis Control Commission
        PO Box 412144
        Boston, MA 02241-2144
    b. Via Courier/Overnight:
        Bank of America Lockbox Services
        Cannabis Control Commission 412144
        MA5-527-02-07
        2 Morrissey Boulevard
        Dorchester, MA 02125

37. In addition to the monetary penalty assessed in paragraph 35, Respondent agrees to a six-month probationary period beginning on the date this Agreement is ratified:
    a. During the probationary period, any sales of expired product will result in an automatic penalty assessment of five hundred ($500) dollars per expired product sold;
    b. Respondent will not be afforded a hearing to challenge these assessments;
    c. Upon receiving a demand for payment from the Commission under this section, Respondent shall provide such payment by check or money order payable to the Cannabis Control Commission Marijuana Regulation Fund within 30 days;

d. Payment for penalties assessed against Respondent under this section shall be mailed to one of the addresses listed in Paragraph 36;

38. Respondent agrees to implement the following corrective measures to prevent future expired product sales:
    a. Retrain employees as to confirmation of expiration dates in Metrc;
    b. Auditing inventory so there is no product in active inventory that is expired;
    c. Upon receiving product from a wholesaler, auditing the expiration date, the Metrc tag, and the specific product description in Metrc, on the product label, and in the purchase order;
    d. Use of Metrc and not the Point of Sale ("POS") system to determine product expiration dates;
    e. Moving expired product to Quarantine both physically and virtually in Metrc;
    f. Being immediately responsive to the Commission with Plans of Correction;
    g. Changed POS to Dutchie which allows for the expiration dates of all product acquired to be input when received from wholesaler, and are doing so;
    h. Weekly audits of product to make sure no product is expiring in the following week;
    i. Using red labels on product bins to indicate expiration dates;

39. The penalty under Paragraph 35 and any subsequent penalties under Paragraph 37 are fines or financial penalties that may be added to Respondent's fee for licensure renewal if unpaid at that time under 935 CMR 500.360(6);

40. Respondent's payment under Paragraph 35, completion of the probationary period under Paragraph 37, and implementation of the corrective measures under Paragraph 38 will satisfy the violations alleged in the Order to Show Cause;

41. Respondent will not be subject to a Mandatory Disqualification or a Presumptive Negative Suitability Determination solely for the violations contained in this Agreement, nor will this Agreement be utilized in connection with an adverse determination for a change of ownership or change of control with respect to Respondent's cannabis license;

42. Notwithstanding the foregoing, the Commission may rely on this Agreement to establish a pattern or practice of noncompliance when calculating a fine, the duration of a suspension, or to support a revocation during subsequent enforcement actions against Respondent, its owners, or Agents;

43. Any issues relating to the underlying investigation and Order to Show Cause that formed the basis for this Agreement against Respondent, and any defenses that Respondent may have to the investigation or Order to Show Cause, shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Agreement;

44. Respondent agrees that the Commission may consider this Agreement and the facts and circumstances described herein in connection with review of an application for licensure or renewal of licensure, provided that this Agreement alone will not support an adverse

determination following the review;

45. By entering into this Agreement, Respondent acknowledges that it has been advised of its right to a hearing and nonetheless wishes to resolve all issues that were the subject of this investigation or in any way related to this investigation and Agreement;

46. If approved by the Commission and upon execution of all Parties, this Agreement shall have the same force and effect as an order entered after a hearing conducted in accordance with G.L. c. 30A pursuant to 935 CMR 500.500(12), except that this Agreement may not be appealed. Failure to comply with the terms of this Agreement, including but not limited to failure to make a timely payment in accordance with Paragraphs 35 through 37, shall constitute the basis for further administrative action against Respondent;

47. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of its choosing and Respondent represents that it had an opportunity to do so prior to signing this Agreement. Respondent acknowledges that it has been given a reasonable period of time in which to consider the terms of this Agreement before signing it. Respondent acknowledges and confirms that it has entered into this Agreement voluntarily and of its own free will, without duress or coercion, and that it is competent to enter into this Agreement. Respondent acknowledges that it has carefully read and fully understands the meaning and intent of this Agreement;

48. Respondent further understands and knowingly and voluntarily waives the following rights:
    a. The right to proceed with an adjudicatory proceeding;
    b. The right to subpoena and cross-examine witnesses, present evidence and testify on Respondent's own behalf at that adjudicatory proceeding; and
    c. The right to appeal this Agreement;

49. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this Agreement pursuant to G.L. c. 30A, § 14;

50. This Agreement is subject to ratification by the Commission. Upon ratification, this Agreement becomes binding on the Parties. Failure to comply with the terms and conditions herein may result in administrative action against Respondent up to and including suspension or revocation of licensure under 935 CMR 500.450;

51. Upon ratification of this Agreement, it shall represent the entire and final agreement of the Parties. If any provision of this Agreement is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of this Agreement shall be given full force and effect;

52. This Agreement shall be binding upon Respondent and shall inure to the benefit of the parties to this Agreement 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 Agreement, which shall then constitute a debt to the Commonwealth and shall have priority over any encumbrance recorded, registered or filed with respect to any site;

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

54. The Commission may reject the terms of this Agreement or otherwise deny ratification and entry of this Agreement. In such event, the terms of this Agreement shall be null, and void and the Parties may proceed to hearing, and this Agreement shall not be used as evidence against Respondent in connection with such proceeding;

55. This Agreement 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;

56. All costs and expenses incurred by Respondent to comply with this Agreement shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission, and Respondent shall not be responsible for any costs and expenses of the Commission related to the preparation, negotiation or enforcement of this Agreement; and

57. For purposes of addressing any future violations of this Agreement, applicable law or regulations shall be construed to include all amendments and revisions to said law or regulations that are in effect at the time of the subsequent violation.

[Signature Page Follows]

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Respondent Herbal Pathways, LLC d/b/a HiBrid

Aman Kaur
Aman Kaur (Sep 10, 2026 10:35:29 EDT)

Aman Kaur, Owner

09/10/2026
Date Signed

Commonwealth of Massachusetts Cannabis Control Commission
Ratified by Commission vote (___ yes, ___ no, ___ abstain) on September ___, 2026.

Travis Ahern, Executive Director

Date Signed

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Smokey Leaf, LLC
49 Bank Row
Greenfield, MA 01301
MR284276

Case No. ENF-2025-0000001901

FINAL ORDER AND STIPULATED AGREEMENT

This Final Order and Stipulated Agreement ("Agreement") is between the Commonwealth of Massachusetts Cannabis Control Commission ("Commission") and Smokey Leaf, LLC ("Respondent") (together with the Commission, collectively, "the Parties").

This Agreement is offered for the purposes of settlement to resolve the Order to Show Cause issued on May 4, 2026 ("Order to Show Cause"). The Commission finds that the resolution of this matter serves the purposes of G.L. c. 94G and 935 CMR 500.000 ("Commission Law") because Respondent has cooperated with the Commission since being issued the Order to Show Cause.

Accordingly, the Parties stipulate to the following Facts of Record, Applicable Law, and Findings as presented in this Agreement. Respondent voluntarily agrees to the stipulated remedy contained in Paragraphs 31 through 53. Following the ratification of this Agreement by majority vote of the Commission, this Agreement is binding on the Parties for the purpose of reaching a final resolution.

Legislative, Statutory, and Regulatory Authority

1. The Commission is charged with the administration and enforcement of laws regulating and licensing adult-use Marijuana Establishments and maintains jurisdiction over the conduct of licensed Marijuana Establishments, including their compliance with the Commonwealth's marijuana laws, G.L. c. 94G, and regulations, 935 CMR 500.000 *et seq*. *See* G.L. c. 94G, § 4(a), (a½);

2. The Commission possesses all the powers necessary or convenient to carry out and effectuate its purposes including, but not limited to:
    a. The power to fine a person licensed for any cause that the Commission deems reasonable, including a violation of G.L. c. 94G or any regulation promulgated by the Commission. G.L. c. 94G, § 4(a)(xiii), (xxii);
    b. The power to gather facts and information applicable to the Commission's obligation to suspend or revoke licenses for a violation of G.L. c. 94G, or any regulation adopted by the Commission. G.L. c. 94G, § 4(a)(xiv);

3. The Commission also has the power to promulgate regulations and to adopt, amend, or repeal regulations for the implementation, administration, and enforcement of G.L. c. 94G. *See* G.L. c. 94G, § 4(a)(xxiv), (xxviii);

4. Accordingly, the Commission has adopted regulations for the administration, clarification and enforcement of laws regulating Marijuana Establishments, including 935 CMR 500.360, which provides that the Commission "may issue an order to a Licensee 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, including M.G.L. c. 94G, and 935 CMR 500.000";

5. Pursuant to that regulatory provision, the Commission may assess an administrative fine of up to $50,000 for each violation, or an order for corrective action setting a reasonable time for correction of the violation, or both. 935 CMR 500.360(2);

6. Each day during which a violation continues may constitute a separate offense, and each instance and provision of the state Marijuana laws that is violated may constitute a separate violation. 935 CMR 500.360(2)(b);

7. In determining the amount of a fine or financial penalty to impose, the Commission or a Commission Delegee may consider a greater or lesser amount depending on aggravating or mitigating circumstances identified by the agency. 935 CMR 500.360(3);

8. At any time, the Commission or a Commission Delegee may, in its discretion, review, approve or reject an informal disposition, but only on a showing that the alleged violations have been corrected, and a submission of a written waiver of its right to judicial review. *See* 935 CMR 500.500(7); *see also* G.L. c. 30A, § 10 (agencies have the authority to make information dispositions by stipulation or settlement);

Facts of Record

9. Respondent is a Marijuana Retail Establishment, License No. MR284276, located in Greenfield, Massachusetts;

10. Respondent received its final license on May 9, 2024, and commenced operations on June 4, 2024;

11. Independent Testing Laboratories ("ITLs") test Marijuana for the Cannabinoid Profile and for contaminants as specified by the Commission (*i.e.*, the dry-weight percentage of delta-nine-tetrahydrocannabinol, cannabidiol, tetrahydrocannabinolic acid and cannabidiolic acid) before it is sold;

12. ITLs report the results of these tests in Metrc, the Commonwealth's designated Seed-to-sale Electronic Tracking System;

13. The results are associated with all Marijuana sampled in a test package and certain Marijuana Products derived therefrom;

14. Licensees can see these reported testing results in Metrc;

15. Licensees can determine a product's expiration date in Metrc by referencing its testing date or other expiration indicators, such as the expiration date columns;

16. The date of testing and expiration date are also included on the product packaging;

17. On November 5, 2024, Metrc began compiling a daily report of all Licensees' expired product transactions from the previous day ("Expired Product Reports");

18. On December 6, 2024, Investigators audited Respondent virtually through Metrc;

19. Investigators discovered that Respondent sold seven expired Marijuana Pre-Rolls: one on November 4, 2024, one on November 6, 2024, one on November 7, 2024, one on November 8, 2024, one on November 10, 2024, one on November 11, 2024, and one on November 12, 2024;

20. The Expired Product Report also shows Respondent sold an Infused Edible on November 8, 2024;

21. The Expired Product Report shows Respondent sold two more expired Marijuana Pre-Rolls to Consumers: one on February 1, 2025, and one on February 2, 2025;

22. On February 3, 2025, Investigators issued Respondent an NOD for the violations observed on February 1, 2025, and February 2, 2025;

23. The Expired Product Reports show Respondent sold five more expired Marijuana Pre-Rolls to Consumers: four on February 3, 2025, and one on February 4, 2025;

24. On June 13, 2025, Investigators issued Respondent an NOD informing them of another Expired Product package in their inventory;

25. Thereafter, the Expired Product Reports show Respondent sold twenty-seven more expired Marijuana Pre-Rolls from that package to Consumers between June 14, 2025, and June 20, 2025: four on June 14, 2025, six on June 15, 2025, one on June 16, 2025, eight on June 17, 2025, five on June 18, 2025, two on June 19, 2025, and one on June 20, 2025;

Applicable Law

26. Marijuana or Marijuana Products with testing dates exceeding one year shall be deemed expired and may not be dispensed, sold, Transferred, or otherwise conveyed until retested. *See* 935 CMR 500.160(5);

Stipulated Findings

27. The Commission, through its Executive Director, and Respondent 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. The terms and conditions of this Agreement are expressly subject to ratification by the full Commission. Pursuant to G.L. c. 6, § 223(e) as amended by St. 2026 c. 65, § 1, two Commissioners shall constitute a quorum, and the affirmative vote of two Commissioners shall be required for ratification of this Agreement;

28. Respondent's actions described in Paragraphs 19 through 25 amounted to selling expired product in violation of 935 CMR 500.160(5);
    a. Between November 4, 2024, and June 20, 2025, Respondent sold 42 products to Consumers with test results exceeding one year;
    b. Respondent violated 935 CMR 500.160(5) 42 times by selling these expired products to Consumers;

29. Respondent has cooperated with Commission staff since the Commission's issuance of the Order to Show Cause;

Stipulated Remedy

30. In lieu of proceeding with an administrative hearing and subsequent proceedings, the Parties agree to the terms and conditions set forth in Paragraphs 31 through 53, inclusive of all subparagraphs;

31. Respondent agrees to pay a negotiated monetary penalty in the amount of **Nineteen Thousand Dollars ($19,000.00)** made payable by check or money order to the order of the Cannabis Control Commission Marijuana Regulation Fund;
    a. Payment shall consist of the following installments due and payable in accordance with the following schedule, however Respondent may pay more than the specified amount if they are able:

Payment	Due Date
$9,500	60 days after the ratification of this Order by the Commission
$9,500	On or before March 29, 2027

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

32. Payment shall be postmarked on or before the due dates identified in Paragraph 31.a. and be mailed to the following address:
    a. Via USPS:

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

b. Via Courier/Overnight:

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

33. In addition to the monetary penalty assessed in paragraph 31, Respondent agrees to a six-month probationary period beginning on the date this Agreement is ratified:
    a. During the probationary period, any sales of expired product will result in an automatic penalty assessment of five hundred ($500) dollars per expired product sold;
    b. Respondent will not be afforded a hearing to challenge these assessments;
    c. Upon receiving a demand for payment from the Commission under this section, Respondent shall provide such payment by check or money order payable to the Cannabis Control Commission Marijuana Regulation Fund within 30 days;
    d. Payment for penalties assessed against Respondent under this section shall be mailed to one of the addresses listed in Paragraph 32;

34. Respondent agrees to implement the following corrective measures to prevent future expired product sales:
    a. Retrain employees as to confirmation of expiration dates in Metrc;
    b. Auditing inventory so there is no product in active inventory that is expired;
    c. Upon receiving product from a wholesaler, auditing the expiration date, the Metrc tag, and the specific product description in Metrc, on the product label, and in the purchase order;
    d. Use of Metrc and not the Point of Sale ("POS") system to determine product expiration dates;
    e. Moving expired product to Quarantine both physically and virtually in Metrc;
    f. Being immediately responsive to the Commission with Plans of Correction;
    g. Changed POS to Dutchie which allows for the expiration dates of all product acquired to be input when received from wholesaler, and are doing so;
    h. Weekly audits of product to make sure no product is expiring in the following week;
    i. Using red labels on product bins to indicate expiration dates;

35. The penalty under Paragraph 31 and any subsequent penalties under Paragraph 33 are fines or financial penalties that may be added to Respondent's fee for licensure renewal if unpaid at that time under 935 CMR 500.360(6);

36. Respondent's payment under Paragraph 31, completion of the probationary period under Paragraph 33, and implementation of the corrective measures under Paragraph 34 will satisfy the violations alleged in the Order to Show Cause;

37. Respondent will not be subject to a Mandatory Disqualification or a Presumptive Negative Suitability Determination solely for the violations contained in this Agreement, nor will this Agreement be utilized in connection with an adverse determination for a change of ownership or change of control with respect to Respondent's cannabis license;

38. Notwithstanding the foregoing, the Commission may rely on this Agreement to establish a pattern or practice of noncompliance when calculating a fine, the duration of a suspension, or to support a revocation during subsequent enforcement actions against Respondent, its owners, or Agents;

39. Any issues relating to the underlying investigation and Order to Show Cause that formed the basis for this Agreement against Respondent, and any defenses that Respondent may have to the investigation or Order to Show Cause, shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Agreement;

40. Respondent agrees that the Commission may consider this Agreement and the facts and circumstances described herein in connection with review of an application for licensure or renewal of licensure, provided that this Agreement alone will not support an adverse determination following the review;

41. By entering into this Agreement, Respondent acknowledges that it has been advised of its right to a hearing and nonetheless wishes to resolve all issues that were the subject of this investigation or in any way related to this investigation and Agreement;

42. If approved by the Commission and upon execution of all Parties, this Agreement shall have the same force and effect as an order entered after a hearing conducted in accordance with G.L. c. 30A pursuant to 935 CMR 500.500(12), except that this Agreement may not be appealed. Failure to comply with the terms of this Agreement, including but not limited to failure to make a timely payment in accordance with Paragraphs 31 through 33, shall constitute the basis for further administrative action against Respondent;

43. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of its choosing and Respondent represents that it had an opportunity to do so prior to signing this Agreement. Respondent acknowledges that it has been given a reasonable period of time in which to consider the terms of this Agreement before signing it. Respondent acknowledges and confirms that it has entered into this Agreement voluntarily and of its own free will, without duress or coercion, and that it is competent to enter into this Agreement. Respondent acknowledges that it has carefully read and fully understands the meaning and intent of this Agreement;

44. Respondent further understands and knowingly and voluntarily waives the following rights:
    a. The right to proceed with an adjudicatory proceeding;
    b. The right to subpoena and cross-examine witnesses, present evidence and testify on Respondent's own behalf at that adjudicatory proceeding; and
    c. The right to appeal this Agreement;

45. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this Agreement pursuant to G.L. c. 30A, § 14;

46. This Agreement is subject to ratification by the Commission. Upon ratification, this Agreement becomes binding on the Parties. Failure to comply with the terms and conditions herein may result in administrative action against Respondent up to and including suspension or revocation of licensure under 935 CMR 500.450;

47. Upon ratification of this Agreement, it shall represent the entire and final agreement of the Parties. If any provision of this Agreement is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of this Agreement shall be given full force and effect;

48. This Agreement shall be binding upon Respondent and shall inure to the benefit of the parties to this Agreement 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 Agreement, which shall then constitute a debt to the Commonwealth and shall have priority over any encumbrance recorded, registered or filed with respect to any site;

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

50. The Commission may reject the terms of this Agreement or otherwise deny ratification and entry of this Agreement. In such event, the terms of this Agreement shall be null, and void and the Parties may proceed to hearing, and this Agreement shall not be used as evidence against Respondent in connection with such proceeding;

51. This Agreement 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;

52. All costs and expenses incurred by Respondent to comply with this Agreement shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission, and Respondent shall not be responsible for any costs and expenses of the Commission related to the preparation, negotiation or enforcement of this Agreement; and

53. For purposes of addressing any future violations of this Agreement, applicable law or regulations shall be construed to include all amendments and revisions to said law or regulations that are in effect at the time of the subsequent violation.

[Signature Page Follows]

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Respondent Smokey Leaf, LLC

Aman Kaur
Aman Kaur (Sep 11, 2026 09:43:04 EDT)

Aman Kaur, Owner

09/11/2026
Date Signed

Commonwealth of Massachusetts Cannabis Control Commission
Ratified by Commission vote (___ yes, ___ no, ___ abstain) on September ___, 2026.

Travis Ahern, Executive Director

Date Signed

COMMONWEALTH OF MASSACHUSETTS
CANNABIS CONTROL COMMISSION

WORCESTER, ss

IN THE MATTER OF

Discern'd Cannabis Purveyors, Inc. **Enforcement Case No: ENF-2026-1909**

License No.MR283997

RECOMMENDED DECISION ON MOTION FOR FAILURE TO REQUEST A HEARING

I. Summary of Decision

This matter involves a Motion for Failure to Request a Hearing ("Motion"), filed by the Cannabis Control Commission ("Commission"), in the matter of Discern'd Cannabis Purveyors, Inc. ("Discern'd") Enforcement Case No. ENF-2026-0000001909.

On June 9, 2026, the Commission issued an Order to Show Cause ("Order") to Discern'd to show cause why its License No. MR283997 should not be revoked. The Order stated:

> "*The Commission issues this order based on Discern'd's failure to cooperate with an investigation into the circumstances surrounding their temporary shutdown. The investigation revealed that Discern'd had failed to retain control over the licensed Premises, leaving behind Marijuana onsite with no security measures in place. Based on the circumstances surrounding the shutdown of its licensed operations and Discern'd's failure to cooperate throughout the course of this investigation, the Commission is no longer confident in Discern'd*'s ability to *competently operate a Marijuana Establishment within the regulated industry.*"

On July 31, 2026, the Commission filed the Motion at issue here, in which it stated that Discern'd had not filed a hearing request and moved that this Hearing Officer find:

(1) Discern'd failed to submit a timely hearing request;

(2) Discern'd waived its right to a hearing through its failure to respond to the Order issued on June 9, 2026;

(3) Based on Discern'd's waiver, that the facts, evidence, and allegations alleged in the Order be deemed as true; and

(4) Recommend to the Commission that Discern'd's License be revoked.

For the reasons set forth below, I find that:

1. Discern'd failed to submit a timely request for a hearing;
2. Discern'd waived its right to a hearing;
3. The facts, evidence, and allegations alleged in the Order are deemed true; and
4. I recommend that the Commission **REVOKE** Discern'd's License no. MR283997.

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

1. On June 9, 2026, the Commission, through its Executive Director and pursuant to its authority under M.G.L. c. 94G, § 4 and 935 CMR 500.370, issued an Order to Discern'd, the holder of Marijuana Retailer License No. MR283997, directing it to show cause why its License should not be revoked. The Order set forth three counts:

Count I	Failure to Submit a Plan of Correction 935 CMR 500.320(1) and 935 CMR 500.450(4)
Count II	Failure to Cooperate with a Commission Investigation 935 CMR 500.301 (3) –(4)
Count III	Incompetent Operation of a Marijuana Establishment 935 CMR 500.450(7)(f)

2. The Order was served on Discern'd by email on June 9, 2026, at the electronic mail address maintained by Discern'd in the Commission's records, in the manner provided by 935 CMR 500.500 and 935 CMR 500.750. The Order notified Discern'd that, pursuant to 935 CMR 500.500(4), it could request a hearing no later than 30 days after the effective date of the notice; it identified the email address to which any request was to be sent; and it stated that a failure to request a hearing in a timely manner would result in a waiver under 935 CMR 500.500(6)(a).

3. The deadline to request a hearing was on or before July 9, 2026. Discern'd did not submit a hearing request by that date and has not submitted one since.

4. On July 31, 2026, the Commission, through its Enforcement Counsel, filed the Motion that is the subject of this decision. Brought under 935 CMR 500.500(4) and (6)(a) and 801 CMR 1.02(4), the Motion asks the Hearing Officer to find that Discern'd (i) failed to submit a timely hearing request; (ii) thereby waived its right to a hearing; (iii) is subject

to having the facts, evidence, and allegations in the Order deemed true; and (iv) should have its License revoked.

5. On August 5, 2026, Enforcement Counsel supplemented the Motion by re-serving, via electronic mail, Exhibits 12, 13, and 14, because the versions originally filed were corrupted and could not be opened.

6. Because the complete exhibit set was not available to Discern'd until August 5, 2026, the undersigned Hearing Officer commenced the seven-day period for Discern'd to respond to the Motion on that date, pursuant to 801 CMR 1.01(7)(a)(1). Discern'd did not file a response to the Motion.

The substantive facts underlying the Order's counts are set forth in the Findings of Fact, Section IV, below, and are deemed true pursuant to 935 CMR 500.500(6)(a).

IV. Findings of Fact

1. On November 11, 2025, the Investigations and Enforcement Department (the "Department") performed an audit of Discern'd's Metrc records and discovered Discern'd had been locked out of their Metrc account. Exhibit 1, ORDER #11-12, 15.

2. On November 12, 2025, the department contacted Discern'd to inquire about its Metrc account status, during that conversation Discern'd paid the outstanding balance and regained access. Exhibit 1, ORDER #12-13.

3. The department learned that Discern'd had been temporarily closed since October 18, 2025, and would be remaining closed until Discern'd could find investors to support continued operation. Exhibit 1, ORDER #13.

4. Once Discern'd's account was unlocked, the department performed a Metrc audit and discovered Discern'd had 28 total packages in its active inventory—24 designated as active waste packages, and four listed as on the sales floor. Exhibit 1, ORDER #15.

5. On November 13, 2025, Discern'd submitted a Temporary Closure Plan to the Department including its explanation for closure, current inventory status, details regarding security, surveillance, facility access and safeguards, plans regarding ongoing compliance and providing anticipated next steps. Discern'd stated they would "maintain full compliance with all CCC regulations during the temporary closure, including active security, accurate Metrc inventory, secured facility conditions, and completion of all required regulatory communications." Exhibit 1, ORDER #16-17.

6. On November 20, 2025, the department issued a Request for Information (RFI) to Discern'd requesting sales reports, security audits, and monthly inventory audits from September 1, 2025, to November 1, 2025, as well as security camera footage with time stamps from any and all Marijuana or Marijuana Products at the Marijuana Establishment as of the date of the RFI to gain additional information that was not included in the Temporary Closure Plan. Exhibit 1, ORDER #18.

7. On December 1, 2025, Discern'd submitted a partial response to the RFI, only producing sales reports from September 1, 2025, to November 1, 2025, providing that any missing information requested by the RFI would be provided to the department within five days. Exhibit 1, ORDER #19.

8. On December 22, 2025, the department sent a second follow-up email to Discern'd requesting the following additional information not previously requested in the RFI; **a.** Waste logs from August 1, 2025, to November 1, 2025; **b.** Camera coverage for the previous five wasting events; **c.** Camera coverage of the last cash pickup; **d.** Any camera coverage from any product transferred out of the establishment, and; **e.** Camera coverage from the last day the establishment was open. Exhibit 1, ORDER #21.

9. On December 22, 2025, the department issued a Notice of Deficiency (NOD) for Discern'd's failure to cooperate with an investigation based on its failure to provide a complete response to the RFI issued on December 1, 2025. Exhibit 1, ORDER #22.

10. On January 5, 2026, the department notified Discern'd that its License was set to expire on January 8, 2026. On January 6, 2026, Discern'd submitted an extension request to the department's Licensing Team but did not notify or respond to the email from its lead Investigator. Exhibit 1, ORDER #23-24.

11. On January 7, 2026, the Commission granted Discern'd's request for an extension. Exhibit 1, ORDER #25.

12. On January 7, 2026, the department attempted to reach Discern'd via telephone regarding the pending NOD and missing RFI response. After making several attempts to contact Discern'd for the missing information, on January 22, 2026, the department issued a Letter of Warning (LOW) citing 935 CMR 500.301(4) for Discern'd's lack of cooperation with a Commission investigation, stating Discern'd had five business days to provide the requested missing documentation from the RFI on November 20, 2025, a Plan of

Correction (POC) for the NOD from December 22, 2025, and a narrative of the Licensee's plans regarding the status of its License and future operation. The LOW also informed Discern'd that failure to respond may result in suspension, revocation, and denial of any renewal application. Exhibit 1, ORDER #26-28.

13. On January 28, 2026, Discern'd entered into an Agreement for Judgment (the "Judgment") in a legal dispute between Discern'd and their landlord, which provided that Discern'd return possession of the Property to the landlord and that Discern'd had abandoned all property still remaining within the building, to include any Marijuana and Marijuana Product. Exhibit 1, ORDER #29.

14. Paragraph 6 of the Judgment states that the parties to the agreement shall contact the Commission relative to the removal of any cannabis products. Exhibit 1, ORDER #30.

5. Discern'd never contacted the Commission to coordinate the removal of any Marijuana or Marijuana Product that remained on the Property. Exhibit 1, ORDER #31.

16. On February 4, 2026, Discern'd's landlord informed the department he had evicted Discern'd from the Property, changed all of the locks, and had disabled Discern'd's alarm and security systems to limit Discern'd's access to the building. Exhibit 1, ORDER #33.

17. On February 25, 2026, because there was, reportedly, still Marijuana and Marijuana Products located on the Property, the department sent a Notice of Inspection (NOI), to Discern'd and the landlord, which stated the Commission would be onsite on February 27, 2026, for purposes of conducting an inspection and to seize any Marijuana or Marijuana Product that remained on the premises. Exhibit 1, ORDER #34.

18. On February 27, 2026, the department carried out an inspection, confirming that the 28 packages of Marijuana and Marijuana Product in Discern'd's vault matched the 24 active waste packages and 4 sales floor packages as represented by Discern'd's Metrc data. Exhibit 1, ORDER #35.

19. On May 18, 2026, the department oversaw the destruction of the 28 packages seized on February 27, 2026. Exhibit 1, ORDER #38.

20. Discern'd has never filed a POC with the Commission as required by 935 CMR 500.320(1). Exhibit 1, ORDER #43.

V. Analysis

The Cannabis Control Commission regulations specifically address this situation. 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," applies. In accordance with this regulation, I assume the truth of the allegations set forth in the June 9, 2026 Order, adopt them as facts as listed above, and can recommend to the Commission disciplinary action(s), sanction(s), or fine(s) or an informal disposition of the matter

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

The first issue 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 after the effective date of the notice. 935 CMR 500.500(4). Consistent with the regulations, the June 9, 2026 Notice, the Order issued by the Commission, stated in bold that if the Discern'd 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 Discern'd 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. Failure to Submit a Plan of Correction – Count I

Under 935 CMR 500.320(1), a Marijuana Establishment must submit a written POC for violations cited in a deficiency statement. Under 935 CMR 500.450(4), grounds for suspension, revocation, or denial of renewal exist where a Marijuana Establishment has failed to submit a POC as required, or to implement a POC as submitted, under 935 CMR 500.320.

The deemed facts establish that the Department issued a NOD on December 22, 2025, and that Discern'd did not submit the required POC. The basis for this count is Discern'd's failure to submit a POC. I conclude that the record establishes grounds for discipline under 935 CMR 500.320(1) and 935 CMR 500.450(4).

C. Failure to Cooperate with Investigation – Count II

The Order charges Discern'd with failing to cooperate with a Commission investigation under 935 CMR 500.301(3) and (4). The deemed facts establish that the Department requested specified records and surveillance materials, that Discern'd supplied only a partial response, that Discern'd

stated it would provide additional materials within five days, and that Discern'd did not provide the outstanding materials despite additional requests and the LOW.

Those facts establish a failure to provide information and records required by the Commission in connection with its investigation, as charged in the Order. Under 935 CMR 500.301(7), failure to cooperate with an inspection or investigation may result in administrative or disciplinary action against the Licensee.

D. Incompetent Operation – Count III

Under 935 CMR 500.450(7)(f), grounds for suspension, revocation, or denial of renewal exist where there has been a lack of responsible operation of a Marijuana Establishment, including incompetent or negligent operation.

The deemed facts establish that Discern'd: (1) represented in its Temporary Closure Plan that it would maintain active security, accurate Metrc inventory, secured facility conditions, and required regulatory communications; (2) failed to provide required information and did not submit a POC; (3) relinquished possession of the licensed property while Marijuana and Marijuana Products remained there; (4) did not coordinate removal of those products with the Commission; (5) left the products at a location where the landlord reported that Discern'd's alarm and security systems had been disabled; and (6) required the Commission to inspect, seize, and later oversee the destruction of 28 packages of Marijuana and Marijuana Products.

These facts demonstrate a lack of responsible operation and support a finding of incompetent operation under 935 CMR 500.450(7)(f). This conclusion rests on the regulatory duties and record-specific circumstances described above, rather than on a dictionary definition of "incompetent."

E. Sanction Recommendation

The Commission's regulations identify the foregoing conduct as grounds for suspension, revocation, or denial of renewal. The selection of sanction must reasonably account for the seriousness of the violations, the circumstances of the licensed operation, the risk to public safety and regulatory oversight, and the need to protect the integrity of the regulated marijuana industry.

Revocation is warranted here. Discern'd did not merely fail to complete an administrative filing. It failed to submit a POC, failed to provide required investigative materials after repeated requests, lost control over the licensed premises, left regulated inventory at the premises, failed to coordinate its removal with the Commission, and required Commission intervention to secure and destroy 28 packages of Marijuana and Marijuana Products.

A lesser sanction would not adequately address the combined compliance, security, inventory-control, and regulatory-oversight failures established by the deemed facts. In particular, the record shows that Discern'd no longer retained practical control of the premises or the inventory and had not demonstrated a capacity to return to compliant operations through a POC, cooperation with the investigation, or another corrective measure.

For these reasons, this Hearing Officer recommend that the Commission revoke Discern'd's License.

VI. Recommended Order

The Hearing Officer recommends that:

1) The Cannabis Control Commission's Motion for Failure to Request a Hearing, filed July 31, 2026 be ALLOWED.

2) Discern'd's Marijuana Retail License (No.MR 283997) be REVOKED.

Cannabis Control Commission

By:

Thomas V. Ralph, Hearing Officer
Cannabis Control Commission
Union Station, 2nd Floor
2 Washington Square
Worcester, MA 01605
Main Office: 774-415-0200
thomas.ralph@cccmass.com

Dated: August 20, 2026

Notices sent to:

Commission Counsel,

Allan Villatoro, Discern'd, Discern'd Cannabis Purveyors, Inc. (allan@discerndcannabis.com)

NOTICE

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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Discern'd Cannabis Purveyors, Inc.
4 Elizabeth Street
North Grafton, MA 01536
License No. MR283997

Case No. ENF-2026-0000001909

ORDER TO SHOW CAUSE - REVOCATION
G.L. c. 94G, § 4(a)(xi), and (a½)(xi)
935 CMR 500.370

Pursuant to its authority under M.G.L. c. 94G, §§ 4(a)(xi) and (a½)(xi) and 935 CMR 500.370 the Commonwealth of Massachusetts Cannabis Control Commission ("Commission"), acting through its Executive Director, orders Discern'd Cannabis Purveyors (hereinafter, "Discern'd" or "Respondent"), a Marijuana Establishment, to show cause as to why Respondent's Marijuana Retail License, License No. MR283997, should not be **revoked.**

The Commission issues this order based on Respondent's failure to cooperate with an investigation into the circumstances surrounding their temporary shutdown. The investigation revealed that Respondent had failed to retain control over the licensed Premises, leaving behind Marijuana onsite with no security measures in place. Based on the circumstances surrounding the shutdown of its licensed operations and Respondent's failure to cooperate throughout the course of this investigation, the Commission is no longer confident in Respondent's ability to competently operate a Marijuana Establishment within the regulated industry.

I. STATUTORY AND REGULATORY AUTHORITY

1. The Commission is charged with the administration and enforcement of laws regulating and licensing Marijuana Establishments and maintains jurisdiction over the conduct of licensed entities including their compliance with the Commonwealth's Marijuana laws, M.G.L. c. 94G and 935 CMR 500.000 *et seq*. M.G.L. c. 94G, § 4(a), (a½);

2. The Commission possesses all powers necessary or convenient to carry out and effectuate its purposes including, but not limited to, the power to revoke or suspend a license. *See* M.G.L. c. 94G, § 4(a)(xi);

3. The Commission also has the power to promulgate regulations and to adopt, amend, or repeal regulations for the implementation, administration, and enforcement of G.L. c. 94G. *See* G.L. c. 94G, § 4(a)(xxiv), (xxviii);

4. In accordance with M.G.L. c. 94G, § 4(a½), the Commission has adopted regulations for the administration, licensing, and oversight of Marijuana Establishments which include a

process for the revocation of a License and grounds for the revocation of a License or registration. *See* 935 CMR 500.370; *see also* 935 CMR 500.450;

5. If, after investigation, the Commission or a Commission Delegee determines that there are grounds to suspend or revoke a License or registration, [the Commission] may also issue an Order to Show Cause why the Licensee [sic] or registration should not be suspended or revoked. *See* 935 CMR 500.370(1);

6. The Commission or a Commission Delegee shall send written notice of the action taken against a Licensee or Registrant and the basis for that action which shall include…the Commission's statutory and regulatory authority…factual basis(es) of the order…alleged violations of law…restrictions on operations, if any…potential for further disciplinary action(s), sanction(s) or fine(s); and the right to a hearing, if any. *See* 935 CMR 500.370(2);

II. FACTUAL ALLEGATIONS

7. Respondent is an adult-use Marijuana Retailer located at 130 Worcester Street, North Grafton, Massachusetts 01536 (the "Property"), with a final license to purchase, deliver, sell or otherwise transfer Marijuana to Marijuana Establishments and to customers under License No. MR283997;

8. The Commission granted Respondent a final license to operate its Marijuana Retail Establishment on January 12, 2023, commencing operations on March 13, 2023;

9. License No. MR283997 expired on March 9, 2026;

10. Respondent recorded its most recent sale in Metrc, the Commission's designated Seed-to-Sale Electronic Tracking System, on October 18, 2025;

11. On November 11, 2025, the Investigations and Enforcement department (the "department") performed an audit of Respondent's Metrc records and discovered Respondent had been locked out of their Metrc account;

12. On November 12, 2025, the department contacted Respondent to inquire about its Metrc account status, during that conversation Respondent paid the outstanding balance and regained access;

13. The department learned that Respondent had been temporarily closed since October 18, 2025, and would be remaining closed until Respondent could find investors to support continued operation;

14. Respondent had not notified the Commission that it lost access to Metrc nor that it had ceased operations as of October;

15. Once Respondent's account was unlocked, the department performed a Metrc audit and discovered Respondent had 28 total packages in its active inventory—24 designated as active waste packages, and four listed as on the sales floor;

16. On November 13, 2025, Respondent submitted a Temporary Closure Plan to the department including its explanation for closure, current inventory status, details regarding security, surveillance, facility access and safeguards, plans regarding ongoing compliance and providing anticipated next steps;

17. Specifically, Respondent stated they would "maintain full compliance with all CCC regulations during the temporary closure, including active security, accurate Metrc inventory, secured facility conditions, and completion of all required regulatory communications";

18. On November 20, 2025, the department issued an Request for Information (RFI) to Respondent requesting sales reports, security audits, and monthly inventory audits from September 1, 2025, to November 1, 2025, as well as security camera footage with time stamps from any and all Marijuana or Marijuana Products at the Marijuana Establishment as of the date of the RFI to gain additional information that was not included in the Temporary Closure Plan;

19. On December 1, 2025, Respondent submitted a partial response to the RFI, only producing sales reports from September 1, 2025, to November 1, 2025, providing that any missing information requested by the RFI would be provided to the department within five days;

20. On December 15, 2025, after not receiving any additional information from Respondent, the department sent a follow-up e-mail reminding them of the outstanding information requested in the RFI;

21. On December 22, 2025, the department sent a second follow-up email to Respondent requesting the following additional information not previously requested in the RFI;
    a. Waste logs from August 1, 2025, to November 1, 2025;
    b. Camera coverage for the previous five wasting events;
    c. Camera coverage of the last cash pickup;
    d. Any camera coverage from any product transferred out of the establishment, and;
    e. Camera coverage from the last day the establishment was open.

22. On December 22, 2025, the department issued a Notice of Deficiency (NOD) for Respondent's failure to cooperate with an investigation based on its failure to provide a complete response to the RFI issued on December 1, 2025;

23. On January 5, 2026, the department notified Respondent that its License was set to expire on January 8, 2026;

24. On January 6, 2026, Respondent submitted an extension request to the department's Licensing team but did not notify or respond to the email from its lead Investigator;

25. On January 7, 2026, the Commission granted Respondent's request for an extension;

26. On January 7, 2026, the department attempted to reach Respondent via telephone regarding the pending NOD and missing RFI responses;

27. After making several attempts to contact Respondent for the missing information, on January 22, 2026, the department issued a Letter of Warning (LOW) citing 935 CMR 500.301(4) for Respondent's lack of cooperation with a Commission investigation, stating Respondent had five business days to provide the requested missing documentation from the RFI on November 20, 2025, a Plan of Correction (POC) for the NOD from December 22, 2025, and a narrative of the Licensee's plans regarding the status of its License and future operation;

28. The LOW also informed Respondent that failure to respond may result in suspension, revocation, and denial of any renewal application;

29. On January 28, 2026, Respondent entered into an Agreement for Judgment (the "Judgment") in a legal dispute between Respondent and their landlord, which provided the Respondent return possession of the Property to the landlord and that Respondent had abandoned all property still remaining within the building, to include any Marijuana and Marijuana Product;

30. Paragraph 6 of the Judgment states that the parties to the agreement shall contact the Commission relative to the removal of any cannabis products;

31. Respondent never contacted the Commission to coordinate the removal of any Marijuana or Marijuana Product that remained on the Property;

32. On February 4, 2026, the department attempted to contact Respondent by telephone and left a voicemail requesting a call back;

33. On February 4, 2026, Respondent's landlord informed the department he had evicted Respondent from the Property, changed all of the locks, and had disabled Respondent's alarm and security systems to limit Respondent's access to the building;

34. On February 25, 2026, because there had reportedly still been Marijuana and Marijuana Products located on the Property, the department sent a Notice of Inspection (NOI) to Respondent and the landlord which stated the Commission would be onsite on February 27, 2026, for purposes of conducting an inspection and to seize any Marijuana or Marijuana Product that remained on the premises;

35. After coordinating with the landlord, the department carried out an inspection on February 27, 2026, confirming that the 28 packages of Marijuana and Marijuana Product

in Respondent's vault matched the 24 active waste packages and 4 sales floor packages as represented by Respondent's Metrc data;

36. The department seized the 28 packages for eventual destruction as Respondent no longer had access to the facility and abandoned the Marijuana and Marijuana Product per the Judgment;

37. Shortly after the February 27, 2026 inspection, Respondent confirmed receipt of the NOI the department sent on February 25, 2026;

38. On May 18, 2026, the department oversaw the destruction of the 28 packages seized on February 27, 2026;

III. ALLEGED VIOLATIONS OF LAW

Count I – 935 CMR 500.320(1) and 935 CMR 500.450(4)
(Failure to Submit a Plan of Correction)

39. The failure of a Marijuana Establishment to submit a POC as required constitutes adequate grounds to revoke a Marijuana Establishment's License. *See* 935 CMR 500.450(4);

40. A Marijuana Establishment or Host Community shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310, within ten business days after receipt of the statement. *See* 935 CMR 500.320(1);

41. On December 22, 2025, the department issued Respondent a NOD for its failure to adequately respond to the RFI issued on November 20, 2025, based on a lack of cooperation with a Commission investigation;

42. On January 22, 2026, after it had not received a responsive POC, nor a response to the initial RFI, the department issued a LOW to Respondent for failing to cooperate with a Commission investigation;

43. To date, Respondent has not submitted a POC responsive to the NOD issued on December 22, 2025, in violation of 935 CMR 500.320(1);

44. Respondent's failure to submit a POC within ten days of the NOD issued on December 22, 2025, or at any time thereafter constitutes full and adequate grounds to revoke Respondent's license pursuant to 935 CMR 500.450(4);

Count II – 935 CMR 500.301(3)-(4)
(Failure to cooperate with a Commission investigation)

45. The Commission hereby incorporates paragraphs 39 through 44 as if restated fully herein;

46. A Marijuana Establishment shall immediately on request make available to the Commission or a Commission Delegee all information that may be relevant to an inspection or investigation of an incident or a complaint. *See* 935 CMR 500.301(3);

47. A Marijuana Establishment shall make all reasonable efforts to facilitate the inspection or investigation of an incident or a complaint, including the taking of samples, photographs, video or other evidence or recordings, and complying with demands for examination and inspection in accordance with 935 CMR 500.302. *See* 935 CMR 500.301(4);

48. After performing a routine compliance check of Respondent's inventory in Metrc on November 11, 2025, the department initiated an investigation into the circumstances surrounding temporary closure of Respondent retail operation and issued an RFI to gather additional information on November 20, 2025;

49. On December 1, 2025, Respondent submitted a partial response to the RFI, stating that any missing information would be provided within five days of the initial response;

50. Between December 15, 2025, and January 22, 2026, the department attempted to contact Respondent six times regarding their investigation;

51. The department emailed Respondent on December 15, 2025, December 22, 2025, and January 5, 2026, regarding information pertaining to their investigation and received no response;

52. On January 7, 2026, the department called Respondent and when the call went unanswered, the department left a voicemail requesting Respondent call them back as soon as it was able to and no response was ever received;

53. On December 22, 2025, and January 22, 2026, the department reached out with official Commission enforcement communications in the form of an NOD and an LOW respectively which were ignored;

54. It was only after issuing a Notice of Inspection to Respondent and Respondent's landlord on February 25, 2026, that Respondent finally reestablished communications with the Commission on February 27, 2026, when it acknowledged receipt of the Notice;

55. As of the date of this Order, Respondent has not provided the outstanding information from the initial RFI and has not submitted a POC, nor has Respondent acknowledged or otherwise addressed the violations identified in the LOW from January 22, 2026;

56. Respondent has not contacted the department since the February 27, 2026, confirmation email;

57. RFIs, NODs and LOWs are vital tools utilized by the department in conducting their investigations, and in order to utilize them they require cooperation and responsiveness from Licensees;

58. By providing only a partial response to the RFI issued on November 20, 2025, Respondent failed to make available to the Commission all information that was relevant to an investigation in violation of 935 CMR 500.301(3);

59. By failing to engage with the Commission's compulsory investigative processes, including failing to respond to the RFI and to the subsequent NOD with a responsive POC, Respondent has engaged in a pattern of uncooperative behavior related to a Commission investigation in violation of 935 CMR 500.301(4);

Count III – 935 CMR 500.450(7)(f)
(Incompetent Operation of a Marijuana Establishment)

60. The Commission hereby incorporates paragraphs 39 through 59 as if restated fully herein:

61. A lack of responsible operation of the Marijuana Establishment, including incompetent or negligent operation constitutes full and adequate grounds for suspending or revoking a Marijuana Establishment's License. *See* 935 CMR 500.450.(7)(f);

62. Respondent submitted a Temporary Closure Plan to the Commission on November 13, 2025, stating they would maintain full compliance with all Commission regulations, including active security, accurate Metrc inventory, secured facility conditions, and completion of all required regulatory communications;

63. On January 28, 2026, Respondent and their landlord entered into the Judgment providing possession of the Property return to the landlord and abandoning all additional property within the facility to include Marijuana and Marijuana Product;

64. Respondent failed to abide by Paragraph 6 of the Judgment by failing to contact the Commission regarding the need to remove Marijuana and Marijuana Products remaining on the Property;

65. On February 4, 2026, the department spoke with the landlord, who informed the department he had evicted Respondent from the premises, changed all of the locks, and had disabled Respondent's alarm and security systems in order to limit Respondent's access to the building;

66. Maintaining the right to occupy the licensed Premises is a key component to responsible operation as the Commission has only approved Respondent to operate its business out of that location and it is the only way for Respondent to implement the security measures required by 935 CMR 500.110;

67. From as early as February 4, 2026, when Respondent was forced off its Premises to February 27, 2026, when the department arrived for their inspection, Respondent left Marijuana and Marijuana Product in the Marijuana Establishment with none of the security measures required by 935 CMR 500.110 in place;

68. After coordinating access to the Premises with Respondent's landlord the department seized the 28 packages of Marijuana and Marijuana Product remaining in Respondent's vault on February 27, 2026;

69. Further, from December 15, 2025, to February 27, 2026, Respondent continuously ignored vital communications from the Commission regarding the compliance of its operations, only taking action to administratively extend its license when told it was nearing expiration in violation of 935 CMR 500.301(3)-(4);

70. Respondent's failure to communicate and shirking its responsibility to implement adequate shut down procedures necessitated the Commission's intervention to seize, secure, and destroy the remaining unsecured Marijuana and Marijuana Products in order to protect public health and safety, detrimentally impacting public welfare by imposing a cost on the Commonwealth of Massachusetts;

71. Respondent's failure to engage in proper shutdown procedures is a lack of competence and the responsibility required to operate a licensed Marijuana Establishment in accordance with 935 CMR 500.450(7)(f);

72. When considered alongside the concurrent violations identified in Counts I and II, however, Respondent has demonstrated wholly incompetent operation of a Marijuana Establishment in violation of 935 CMR 500.450(7)(f);

IV. ORDER

Respondent's violations and conduct constitute full and adequate grounds to revoke its Licenses. In accordance with its authority under 935 CMR 500.450 and G.L. c. 94G, and the Commission, acting through its Executive Director, hereby **ORDERS** the following:

73. **Revocation** of License No. MR283997;

Revocation of Respondent's License shall take effect on July 10, 2026 at 12:01 AM, unless a timely hearing request is made pursuant to Section V of this Order.

Pursuant to 935 CMR 500.370, the Commission reserves the right to modify, amend, or rescind this Order on conditions just to all parties.

V. HEARING RIGHTS

Respondent may request a hearing in accordance with 935 CMR 500.500 by submitting the accompanying form to the Commission at 2 Washington Square, Union Station, Worcester,

Massachusetts 01604. The form may also be submitted electronically to the Commission's Hearings mailbox at Hearings@CCCMass.com, copying Enforcement@CCCMass.com.

A request for hearing shall specifically identify each issue and fact in dispute and state the position of Respondent, the pertinent facts to be adduced at the hearing, and the reasons for supporting that position. *See* 935 CMR 500.500(4)(a). Further, if represented by counsel, a notice of representation must accompany the request.

A hearing request must be submitted and postmarked no later than thirty (30) days from the date of this notice. 935 CMR 500.500(4). Hearings shall be held before the Commission, or a hearing officer appointed by the Commission. The hearing will be conducted pursuant to G.L. c. 30A and the informal rules of adjudicatory practice and procedure, 801 CMR 1.02. The failure to timely file a request for a hearing or to state the basis of the hearing request will result in dismissal of the challenge to the findings set forth in this notice and the Hearing Officer may assume the truth of the allegations set forth in this Order and recommend to the Commission disciplinary action(s), sanction(s) or fine(s) or an informal disposition of the matter. *See* 935 CMR 500.500(4)(b); *see also* 935 CMR 500.500(6)(a) & (b).

Issuance of this order shall not limit the Commission from issuing a further order to take further administrative action against Respondent, including suspension or revocation of licensure.

Signed and Effective this 9th day of June 2026:

Commonwealth of Massachusetts Cannabis Control Commission

Travis Ahern, Executive Director

Cc:
Timothy Goodin, Co-Interim Chief of Investigations and Enforcement
Armond Enos, Co-Interim Chief of Investigations and Enforcement
Katherine Binksoski, Director of Investigations
Jacob Nielson, First Assistant Enforcement Counsel

CERTIFICATE OF SERVICE

I, Jerome Hanley, Esq. hereby certify that on this 9th day of June 2026, I served a copy of this Order to Show Cause- Notice of Revocation on Discern'd by electronic mail to the owner of record Allan J. Villatoro at allan@discerndcannabis.com.

Jerome Hanley

Jerome Hanley, Esq.
MA BBO # 707265
Enforcement@CCCMass.com
Union Station
2 Washington Square
Worcester, Massachusetts 01609

Pursuant to the vote taken on April 16, 2026, and amended on June 11, 2026, the Commission will not accept new applications for Marijuana Cultivation licenses during the suspension period starting June 16, 2026 for a duration of 120 days. For more information, please check the Bulletin section of the Commission website.

Massachusetts Cannabis Control CommissionMassCIP JH

...> Licenses > MR283997

Applications
Licenses
External Users
Inspections
Dashboards
Reports
Inspection Schedule
Configuration

Marijuana Retailer (Expired) #MR283997

Business Name: Discern'd Cannabis Purveyors, Inc.
Tax Identification Number: 85-4085177
Business Email Address: allan@discerndcannabis.com
Business Phone Number: 774-922-7089
Mailing Address: 4 Elizabeth Street North Grafton MA 01536
Business Address: 130 Worcester Street North Grafton MA 01536
Payment Received: $10,000.00
Payment Required: $10,000.00
Original Issued Date: April 16, 2021 View User
Issued Date: July 13, 2023
Expiration Date: March 09, 2026
Original Expiration Date: July 17, 2024

License Data | Applications | Events | Payments | Inspections | Terms and Conditions | License Histor

Receivership Information

Receiver First Name:

Receiver Last Name:

Affiliated/ Engaged Individuals:

Affiliated/ Engaged Entities:

Receiver Phone Number:

Receiver Email:

Receiver Address:

Receiver Zip Code:

CNB Workflow

Application Classification: Expedited Review - DBE Status

First Compliance Review Date: January 05, 2021

Deemed Complete Date: January 14, 2021

Date of Final Licensure: January 12, 2023

Commence Operations Date: March 13, 2023

Current Queue:

Position in the Queue:

License Extension Information

Total Extension Days this License Period: 600

HCA Extension Days: 480

COGS Extension Days: 0

Administrative Extension Days: 0

Other Extension Days: 120

Pending Extension Days: 0

Remaining Extension Days Available: 365

Temporary Closures

CNB Document Upload

CNB Document Upload

Edit Documents

About the Marijuana Establishment

Business Legal Name: Discern'd Cannabis Purveyors, Inc.

Federal Tax Identification Number EIN/TIN: 85-4085177

Phone Number: 774-922-7089

Email Address: allan@discerndcannabis.com

Business Address 1: 130 Worcester Street

Business Address 2:

Business City: North Grafton

Business State: MA

Business Zip Code: 01536

Mailing Address 1: 4 Elizabeth Street

Mailing Address 2:

Mailing City: North Grafton

Mailing State: MA

Mailing Zip Code: 01536

Certified Disadvantaged Business Enterprises (DBEs)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

DBE Documentation



Document Name: Expedited Review Affidavit_Notarized (1).PDF
Document Category: Other
Storage: amazonS3
Upload Date: 12/30/2020, 4:02:40 PM (GMT-5)
Uploaded By:allan villatoro



Document Name:2023-05-05 Discern'd Cannabis Purveyors Inc. - Update on SDO Certification Status.pdf
Document Category: Supplier Diversity Office (SDO) Certification
Storage: amazonS3
Upload Date: 05/05/2023, 3:50:07 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Priority Applicant

Priority Applicant: No

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD Information

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

Certificate of Registration

Edit Documents

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: 46.61

Percentage Of Control: 60.99

Role: Executive / Officer

Other Role: CEO

First Name: Allan

Middle Name: J.

Last Name: Villatoro

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?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

Entities with Direct or Indirect Authority

Close Associates and Members

Capital Resources - Individuals

Individual Contributing Capital 1

First Name: Allan

Middle Name: J.

Last Name: Villatoro

Suffix:

Email: allan@discerndcannabis.com

Phone: 774-922-7089

Address 1: 4 Elizabeth Street

Address 2:

City: North Grafton

State: MA

Zip Code: 01536

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: $40,000.00

Percentage of Initial Capital: 100

Capital Attestation: Yes

Capital Resources Documentation - Individuals

Amounts and Sources of Capital Documentation

Document Name:401K balance_2020_Dec 28.pdf
Document Category: Bank Record
Storage: amazonS3
Upload Date: 12/30/2020, 4:07:52 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Capital Resources - Entities

Capital Resources Documentation - Entity

Amounts and Sources of Capital Documentation

Edit Documents

Business Interests in other States or Countries

Business Interest Documentation

Supporting Document

Edit Documents

Disclosure of Individual Interests

Individual Interest Documentation

Supporting Documents

Edit Documents

Marijuana Establishment Property Details

Establishment Address 1: 130 Worcester Street

Establishment Address 2:

Establishment City: Grafton

Establishment Zip Code: 01519

Approximate square footage of the establishment: 2400

How many abutters does this property have?: 21

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

Bond or Escrow Documentation



Document Name:lp discernd30.pdf
Document Category: Documentation of Bond
Storage: amazonS3
Upload Date: 12/30/2020, 4:13:56 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Property Interest Documentation

Document Name:BRN3C2AF4823CB0_0000003907.pdf
Document Category: Permission to Use Premises
Storage: amazonS3
Upload Date: 12/30/2020, 4:14:29 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Host Community Information

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.: $0.00

Municipal Financial Benefit Documentation

Document Name:2023-04-21 Discern'd Cannabis Purveyors Inc. - Municipal Benefit Documentation.pdf
Document Category: Accounting Records
Storage: amazonS3
Upload Date: 04/21/2023, 4:54:00 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Plan to Remain Compliant

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Plan to Remain Compliant (2023 Update).pdf
Document Category: Plan to Remain Compliant
Storage: amazonS3
Upload Date: 04/20/2023, 5:32:23 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Host Community Documentation

Document Name:discern'd.cannabis-grafton-130.worcester.st-plan to remain compliant with local permits.bylaws - 12.24.20.docx.pdf
Document Category: Plan to Remain Compliant with Local Zoning
Storage: amazonS3
Upload Date: 12/28/2020, 1:28:16 PM (GMT-5)
Uploaded By:allan villatoro

Document Name:HCA Certfication Form Discern'd Cannabis.pdf
Document Category: Certification of Host Community Agreement
Storage: amazonS3
Upload Date: 12/28/2020, 1:28:49 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Updated for RFI Discern'd Cannabis Purveyors COM packet.pdf
Document Category: Community Outreach Meeting Documentation
Storage: amazonS3
Upload Date: 01/05/2021, 1:54:44 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Municipal Cost Documentation

Document Name:2023-05-05 Discern'd Cannabis Purveyors Inc. - Municipal No Response (Signed).pdf
Document Category: No Municipal Response Attestation
Storage: amazonS3
Upload Date: 05/05/2023, 4:05:36 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Are you submitting an HCA or an HCA Waiver?:

If you are submitting an HCA, did you use and upload the Commission's Model HCA Form?:

Is the HCA or HCA Waiver that you are providing as part of your application the most recently executed agreement that is in effect between the business and the municipality?:

What is the execution date of the HCA or HCA Waiver that you have provided as part of your application?:

Positive Impact Plan

Positive Impact Plan

Document Name:NEVA letter for Discern'd Cannabis Purveyors.pdf
Document Category: Other
Storage: amazonS3
Upload Date: 12/30/2020, 4:19:36 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Revised Positive Impact Plan - Discern'd Cannabis Purveyors (2).pdf
Document Category: Plan for Positive Impact
Storage: amazonS3
Upload Date: 01/07/2021, 2:25:47 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Report of Progress or Success of the Positive Impact Plan

Edit Documents

Documentation Demonstrating Progress or Success

Edit Documents

If your proposed plan has a goal of donating monies to areas of disproportionate impact, as defined by the Commission, please enter the dollar amount, if not, enter 0:

Please state the amount of monies you donated to areas of disproportionate impact during the latest annual renewal period:

If your proposed plan has a goal of donating monies to the Cannabis Social Equity Trust Fund, please enter the donation dollar amount, if not, enter 0:

Please state the amount of monies you donated to the Cannabis Social Equity Trust Fund during the latest annual renewal period:

If your proposed plan has a goal of hiring individuals that have been disproportionately impacted, as defined by the Commission, please enter the percentage goal for hiring, if not, enter 0:

Please state the percentage of individuals that have been disproportionately harmed by marijuana prohibition currently on staff for this license as of the date of this submission:

Diversity Plan

Current Diversity Plan

Edit Documents

Report of Progress or Success of the Diversity Plan

Edit Documents

Documentation Demonstrating Progress or Success

Edit Documents

People of color, particularly Black, African American, Latinx and Indigenous people:

Veterans:

Women:

Persons with disabilities:

LGBTQ+ people:

If your proposed plan has a goal of contracting with diverse suppliers, vendors or ancillary businesses, or Certified Disadvantaged Business Enterprises (DBEs) as defined by the Commission, please enter the percentage goal below. (If you did not have a diverse supplier goal, please enter 0)::

Please state the percentage of diverse suppliers, vendors or ancillary businesses that the establishment contracted with during the latest renewal period:

If your proposed plan has a goal of donating monies to charitable organizations that work with diverse populations, as defined by the Commission, please enter an anticipated dollar amount: (If you did not have a goal to donate to diverse organizations, please enter 0)::

Please state the amount of monies you donated to charitable organizations that work with diverse populations, during the latest renewal period:

Additional Information Notification

Notification:

Individual Background Information

Individual Background Information 1

Role:

Other Role:

First Name: Allan

Middle Name: J.

Last Name: Villatoro

Suffix:

Former Last Name:

Alias 1:

Alias 2:

Alias 3:

Phone: 774-922-7089

Email: allan.vallatoro@gmail.com

Primary Address 1: 4 Elizabeth Street

Primary Address 2:

Primary City: North Grafton

Primary State: MA

Primary Zip Code: 01536

Years at this Address: 8

Date of Birth: December 12, 1982

Last Four Digits of Social Security Number: 3249

RMD Association: Not associated with an RMD

Background Question: No

Description of Background Events:

Background Check Supporting Documentation

Supporting Documentation

Document Name: Copy of Spinney Release Authorization signed and notarized.pdf
Document Category: Release authorization form
Storage: amazonS3
Upload Date: 12/28/2020, 1:54:06 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Copy of Spinney IVES 4506-T form.pdf
Document Category:IVES form 4506-T
Storage: amazonS3
Upload Date: 12/28/2020, 1:54:07 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Copy of Spinney Disclosure and Acknowledgement Form.pdf
Document Category: Disclosure and acknowledgement form
Storage: amazonS3
Upload Date: 12/28/2020, 1:54:08 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Copy of Spinney CORI form signed and notarized.pdf
Document Category: Massachusetts CORI Authorization Form
Storage: amazonS3
Upload Date: 12/28/2020, 1:54:10 PM (GMT-5)
Uploaded By:allan villatoro



Document Name: Copy of Bruce Spinney driver's license MA.jpeg
Document Category:MA Driver's License

Storage: amazonS3
Upload Date: 12/28/2020, 1:54:14 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: BackgroundFormDiscernd.pdf
Document Category: Disclosure and acknowledgement form
Storage: amazonS3
Upload Date: 12/28/2020, 1:55:10 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name: Background Check Disclosure_Signed.PDF
Document Category: Disclosure and acknowledgement form
Storage: amazonS3
Upload Date: 12/28/2020, 2:01:01 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name: Background Check Release_Signed.PDF
Document Category: Release authorization form
Storage: amazonS3
Upload Date: 12/28/2020, 2:02:31 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name: Allan_license.PDF
Document Category:MA Driver's License
Storage: amazonS3
Upload Date: 12/28/2020, 2:02:40 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name: Background authorization (2).PDF
Document Category: Disclosure and acknowledgement form
Storage: amazonS3
Upload Date: 12/28/2020, 2:03:42 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name:CORI_Signed_Notarized.PDF
Document Category: Massachusetts CORI Authorization Form
Storage: amazonS3
Upload Date: 12/30/2020, 4:21:11 PM (GMT-5)
Uploaded By:allan villatoro

PDF

Document Name: Allan_4506T (1).PDF
Document Category:IVES form 4506-T
Storage: amazonS3
Upload Date: 12/30/2020, 4:23:59 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Entity Background Check Information

Massachusetts Business Registration

Massachusetts Business Identification Number: 001472405

Doing-Business-As Name:

DBA Registration City:

Required Business Documentation

Document Name: Cert of Good Standing_DUA Attestation Form.PDF
Document Category: Department of Revenue - Certificate of Good standing
Storage: amazonS3
Upload Date: 12/28/2020, 2:05:24 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discernd_By-laws.PDF
Document Category: Bylaws
Storage: amazonS3
Upload Date: 12/28/2020, 2:05:28 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Certificate of good standing_Mass tax connect.pdf
Document Category: Department of Revenue - Certificate of Good standing
Storage: amazonS3
Upload Date: 12/28/2020, 2:05:29 PM (GMT-5)
Uploaded By:allan villatoro

Document Name:BOSTON_LAUREL-#1893275-v1-Articles_of_Formation.pdf
Document Category: Articles of Organization
Storage: amazonS3
Upload Date: 12/28/2020, 2:05:51 PM (GMT-5)
Uploaded By:allan villatoro

Document Name:BOSTON_LAUREL-#1893430-v1-Good_Standing_Certificate.pdf
Document Category: Secretary of Commonwealth - Certificate of Good Standing
Storage: amazonS3
Upload Date: 12/28/2020, 2:05:52 PM (GMT-5)
Uploaded By:allan villatoro

Edit Documents

Certificates of Good Standing

Document Name:2023-04-20 Discernd Cannabis Purveyors - Cert of Good Standing (SOC).pdf
Document Category: Secretary of Commonwealth - Certificate of Good Standing
Storage: amazonS3
Upload Date: 04/21/2023, 4:55:10 PM (GMT-4)
Uploaded By:allan villatoro

Document Name:2023-05-05 Discern'd Cannabis Purveyors Inc. - DUA Certificate.pdf
Document Category: Department of Unemployment Assistance - Certificate of Good standing
Storage: amazonS3
Upload Date: 05/05/2023, 4:00:03 PM (GMT-4)
Uploaded By:allan villatoro

Document Name:2023-06-02 Discernd Cannabis Purveyors Inc. - Cert of Good Standing (DOR).pdf
Document Category: Department of Revenue - Certificate of Good standing
Storage: amazonS3
Upload Date: 06/02/2023, 6:14:15 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Business Plan

Business Plan Documentation

Document Name: Letter_of_Intent_to_Bind_Coverage_-_DISCERN'D_CANNABIS_PURVEYORS,_INC..pdf
Document Category: Plan for Liability Insurance

Document Name: Business Plan_2020_Dec29.pdf
Document Category: Business Plan
Storage: amazonS3
Upload Date: 12/30/2020, 4:25:26 PM (GMT-5)
Uploaded By:allan villatoro

Storage: amazonS3
Upload Date: 12/30/2020, 4:24:49 PM (GMT-5)
Uploaded By:allan villatoro

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Proposed Timeline (2023 Update).pdf
Document Category: Proposed Timeline
Storage: amazonS3
Upload Date: 04/20/2023, 5:35:54 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Operating Policies and Procedures

Policies and Procedures Documentation

Document Name: Discern'd - Storage of Marijuana (1).pdf
Document Category: Storage of marijuana
Storage: amazonS3
Upload Date: 12/30/2020, 4:28:39 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discner'd - Prevention of Diversion (1).pdf
Document Category: Prevention of diversion
Storage: amazonS3
Upload Date: 12/30/2020, 4:28:41 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Security Plan updated (1).pdf
Document Category: Security plan
Storage: amazonS3
Upload Date: 12/30/2020, 4:28:43 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Restricting Access to age 21 and older - revised (1).pdf
Document Category: Restricting Access to age 21 and older
Storage: amazonS3
Upload Date: 12/30/2020, 4:28:49 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Transportation of Marijuana (1).pdf
Document Category: Transportation of marijuana
Storage: amazonS3
Upload Date: 12/30/2020, 4:29:24 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd- Inventory Procedures (1).pdf
Document Category: Inventory procedures
Storage: amazonS3
Upload Date: 12/30/2020, 4:29:25 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Dispensing Procedures (1).pdf
Document Category: Dispensing procedures
Storage: amazonS3
Upload Date: 12/30/2020, 4:29:30 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Personnel Policies Including Background Checks (1).pdf
Document Category: Personnel policies including background checks
Storage: amazonS3
Upload Date: 12/30/2020, 4:29:31 PM (GMT-5)
Uploaded By:allan villatoro

Document Name: Discern'd - Energy Compliance Plan - Retail (1).pdf

Document Name: Discern'd - Qualifications and Training (1).pdf

Document Category: Energy Compliance Plan
Storage: amazonS3
Upload Date: 12/30/2020, 4:30:03 PM (GMT-5)
Uploaded By:allan villatoro

Document Category: Qualifications and training
Storage: amazonS3
Upload Date: 12/30/2020, 4:30:04 PM (GMT-5)
Uploaded By:allan villatoro



Document Name: Discern'd - Maintaining of Financial Records (1).pdf
Document Category: Maintaining of financial records
Storage: amazonS3
Upload Date: 12/30/2020, 4:30:07 PM (GMT-5)
Uploaded By:allan villatoro



Document Name: Discern'd - Record Keeping Procedures (1).pdf
Document Category: Record Keeping procedures
Storage: amazonS3
Upload Date: 12/30/2020, 4:30:08 PM (GMT-5)
Uploaded By:allan villatoro



Document Name:UPDATED Discern'd - Plan for Obtaining Marijuana and Marijuana Products.pdf
Document Category: Plan for obtaining marijuana or marijuana products
Storage: amazonS3
Upload Date: 01/07/2021, 2:27:21 PM (GMT-5)
Uploaded By:allan villatoro



Document Name:UPDATED Discern'd - Quality Control and Testing.pdf
Document Category: Quality control and testing
Storage: amazonS3
Upload Date: 01/07/2021, 2:27:22 PM (GMT-5)
Uploaded By:allan villatoro



Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Diversity Plan (2023 Update).pdf
Document Category: Diversity plan
Storage: amazonS3
Upload Date: 04/20/2023, 5:41:13 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Marijuana Retailer Specific Requirements

Adequate Patient Supply Documentation

Edit Documents

Reasonable Substitutions of Marijuana Types and Strains Documentation

Edit Documents

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 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

The licensee attests to only using Commission approved symbols for packaging and labeling, found in 935 CMR 500.105(5)(a)(8) and (9) and outlined here . Said images may only be used in compliance with the Commission's regulations.:

Additional Information Notification

Notification:

Compliance with Positive Impact Plan - Pre February 27, 2024

Progress or Success Goal 1

Description of Progress or Success: See attached.

Documentation

PDF

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Compliance with Positive Impact Plan (2023).pdf
Document Category: Other
Storage: amazonS3
Upload Date: 04/20/2023, 5:55:46 PM (GMT-4)
Uploaded By:allan villatoro

PDF

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Positive Impact Plan (2023 Update).pdf
Document Category: Other
Storage: amazonS3
Upload Date: 04/20/2023, 5:55:47 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Compliance with Diversity Plan

Diversity Progress or Success 1

Description of Progress or Success: See attached.

Documentation

PDF

PDF

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Compliance with Diversity Plan (2023).pdf
Document Category: Other
Storage: amazonS3
Upload Date: 04/20/2023, 5:56:03 PM (GMT-4)
Uploaded By:allan villatoro

Document Name:2023-04-20 Discern'd Cannabis Purveyors Inc. - Diversity Plan (2023 Update).pdf
Document Category: Other
Storage: amazonS3
Upload Date: 04/20/2023, 5:56:04 PM (GMT-4)
Uploaded By:allan villatoro

Edit Documents

Hours of Operation

Monday From: 10:00 AM

Monday To: 8:00 PM

Tuesday From: 10:00 AM

Tuesday To: 8:00 PM

Wednesday From: 10:00 AM

Wednesday To: 8:00 PM

Thursday From: 10:00 AM

Thursday To: 8:00 PM

Friday From: 10:00 AM

Friday To: 8:00 PM

Saturday From: 10:00 AM

Saturday To: 8:00 PM

Sunday From: 10:00 AM

Sunday To: 5:00 PM

Emergency Contacts

Emergency Contact 1

First Name: Allan

Last Name: Villatoro

Email: allan@discerndcannabis.com

Phone: 774-922-7089

Fee Waiver

Social Equity Program or Economic Empowerment Fee Waiver Request: No

From:	Enforcement
To:	"allan@discerndcannabis.com"
Bcc:	Travis Ahern; Timothy Goodin; Jacob Nielson; Jerome Hanley; Madison Boudreau; Amanda Dupuis; Armond Enos; Katherine Binkoski; Ryan Basting; Olivia Koval
Subject:	ENF-2026-0000001909 Order to Show Cause - Discern"d Cannabis Purveyors, Inc.
Date:	Tuesday, June 9, 2026 10:30:00 AM
Attachments:	image001.png

Good morning,

The link embedded below contains an Order to Show Cause for Discern'd Cannabis Purveyors, Inc., as well as a Babel Notice, Hearing Request, Informal Dispute Resolution Request, and a Notice of Appearance form. To access and download the documents, sign in with your name and email address. A copy of the materials will be sent to the mailing address of record.

Log in information is:
Allan J. Villatoro
allan@discerndcannabis.com
Discern'd Cannabis Purveyors, Inc.

ShareFile Link:
https://cccmass.sharefile.com/d-s2673a4f39f7c4bdcb765cebf35e454dd

Sincerely,

Barbara Cooney, *Enforcement Paralegal*
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
(O) (774) 415-0472 **(M)** (617) 947-5509
Barbara.Cooney@cccmass.com
www.Mass-Cannabis-Control.com

Please consider all email communications sent to or received by the Cannabis Control Commission (Commission) to be a matter of public record. Commission emails may be disclosed in response to a request made pursuant to the Public Records Law, G. L. c. 66, §10 and G. L. c. 4, § 7, cl. 26, or in response to other compulsory legal process.

Secretary of the Commonwealth of Massachusetts
William Francis Galvin

Business Entity Summary

ID Number: 001472405

Request certificate | New search

Summary for: DISCERN'D CANNABIS PURVEYORS, INC.

The exact name of the Domestic Profit Corporation: DISCERN'D CANNABIS PURVEYORS, INC.	
Entity type: Domestic Profit Corporation	
Identification Number: 001472405	
Date of Organization in Massachusetts: 11-27-2020	**Date of Revival:**
	Last date certain:
Current Fiscal Month/Day: 12/31	**Previous Fiscal Month/Day:** 12/31

The location of the Principal Office:

Address: 130 WORCESTER STREET
City or town, State, Zip code, Country: NORTH GRAFTON, MA 01536 USA

The name and address of the Registered Agent:

Name: ALLAN VILLATORO
Address: 4 ELIZABETH STREET
City or town, State, Zip code, Country: NORTH GRAFTON, MA 01536 USA

The Officers and Directors of the Corporation:

Title	Individual Name	Address
PRESIDENT	ALLAN VILLATORO	4 ELIZABETH STREET NORTH GRAFTON, MA 01536 USA
TREASURER	ALLAN VILLATORO	4 ELIZABETH STREET NORTH GRAFTON, MA 01536 USA
SECRETARY	ALLAN VILLATORO	4 ELIZABETH STREET NORTH GRAFTON, MA 01536 USA
CEO	ALLAN VILLATORO	4 ELIZABETH STREET NORTH GRAFTON, MA 01536 USA
DIRECTOR	ALLAN VILLATORO	4 ELIZABETH STREET NORTH GRAFTON, MA 01536 USA

Business entity stock is publicly traded: ☐

The total number of shares and the par value, if any, of each class of stock which this business entity is authorized to issue:

Class of Stock	Par value per share	Total Authorized		Total issued and outstanding
		No. of shares	Total par value	No. of shares
CNP	0	275,000	$0	1,000

☐ **Consent** ☐ **Confidential Data** ☐ **Merger Allowed** ☐ **Manufacturing**

View filings for this business entity:

ALL FILINGS
Annual Report
Application For Revival
Articles of Amendment
Articles of Charter Surrender
Articles of Consolidation - Domestic and Domestic

View filings

Comments or notes associated with this business entity:

New search

 Enforcement Exhibit 1

Outlook

FW: Your support case has been received! Case Number - 02341607 [thread::je0lRM7cITCFvFt3AGsohyA::]

From Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Date Thu 11/13/2025 4:45 PM
To Armond Enos <Armond.Enos@cccmass.com>

FYI

From: statesupport@metrc.com <statesupport@metrc.com>
Sent: Wednesday, November 12, 2025 3:11 PM
To: Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Subject: RE: Your support case has been received! Case Number - 02341607 [thread::je0lRM7cITCFvFt3AGsohyA::]

Good afternoon, Michalla,

We appreciate your patience while we had our Billing Team review license MR283997. I apologize for the miscommunication, as it appears they are not able to see the exact date that the license was locked due to non-payment. They did confirm that it would have occurred between the 1st and the 10th, as the license will lock after 90 days of no payments.

We show that license MR283997 is past due by $124.50 due to non-payment of September, October, and November's Reporting Fees.

Please let us know if you have questions.

The case number is 02341607.

Warm regards,

D Crowder
Customer Support Escalation Lead
support.metrc.com

Did you know? For faster case resolution and to access real-time status updates, log into the Metrc Support portal using the button below.

(link to portal: Support Portal < https://metrc.my.site.com)

---------- Original Message ----------

From:
Sent: 11/12/2025, 12:57 PM
To: michalla.dasilva@cccmass.com
Subject: Your support case has been received! Case Number - 02341607

Hello Michalla,

Thank you for reaching Metrc Support. A case has been created on your behalf in order for our team to track the issue. Please find details of your support case below:

Case Number: 02341607

Subject: Questions about locked license MR283997

If necessary, we will be in contact as soon as we are able in order to further assist you.

If you would like for real time status updates on your case then please log into our help portal. You can access the portal using the button below.

Help Portal

Metrc Customer Support
support.metrc.com

thread::je0lRM7cITCFvFt3AGsohyA::

Licensees

Active | Inactive

License No.	Facility	Current Name	Status	L.	Type	Granted	Expires
MR283997	Discern'd Cannabis Purveyors, Inc.	Discern'd Cannabis Purveyors, Inc.	Active	Yes	Marijuana Retailer	04/16/2021	01/08/2026

1 Page 1 of 1 20 rows per page

Tag	Location	Category	Quantity	Unit Of Measure
1A40A03000034BD000015220	Sales Floor	Concentrate (Each)	18	ea
1A40A03000034BD000020827	Sales Floor	Concentrate (Each)	16	ea
1A40A03000034BD000023678	Sales Floor	Concentrate (Each)	5	ea
1A40A01000020D2000124698	Sales Floor	Buds	3.5	g
1A40A0300009665000000235	Waste	Concentrate (Each)	1	ea
1A40A0300009665000000236	Waste	Vape Product	1	ea
1A40A0300009665000000237	Waste	Vape Product	1	ea
1A40A0300009665000000238	Waste	Vape Product	1	ea
1A40A0300009665000000239	Waste	Concentrate (Each)	1	ea
1A40A0300009665000000363	Waste	Vape Product	1	ea
1A40A0300009665000000362	Waste	Infused (edible)	1	ea
1A40A0300009665000000361	Waste	Infused Pre-Rolls	1	g
1A40A0300009665000000241	Waste	Vape Product	1	ea
1A40A0300009665000000360	Waste	Infused (edible)	1	ea
1A40A030000A1B9000087293	Waste	Vape Product	1	ea
1A40A0300009665000000359	Waste	Vape Product	1	ea
1A40A0300009665000000358	Waste	Vape Product	1	ea
1A40A0300009665000000355	Waste	Vape Product	1	ea
1A40A0300009665000000247	Waste	Vape Product	1	ea
1A40A0300009665000000250	Waste	Vape Product	1	ea
1A40A0300009665000000251	Waste	Vape Product	1	ea
1A40A0300009665000000269	Waste	Vape Product	1	ea
1A40A0300009665000000271	Waste	Vape Product	1	ea
1A40A0300009665000000272	Waste	Vape Product	1	ea
1A40A0300009665000000279	Waste	Vape Product	1	ea
1A40A0300009665000000112	Waste	Vape Product	1	ea
1A40A030000BA56000039644	Waste	Infused (edible)	1	ea
1A40A010000733E000007096	Waste	Infused (edible)	1	ea

DISCERN’D CANNABIS PURVEYORS, INC.

TEMPORARY CLOSURE PLAN / REPORT

Discern’d Cannabis Purveyors, Inc.

License Number: MR283997

Submitted: November 13, 2025

1. Reason for Temporary Closure

Discern’d Cannabis Purveyors, Inc. temporarily closed retail operations as of late October 2025. The company is evaluating strategic options including new partnerships, investment opportunities, and operational improvements to support an efficient and compliant reopening. The Licensee understands that any change of control or ownership requires prior approval from the Cannabis Control Commission and will not undertake any such action without proper filings and approval. No ownership changes have been made or initiated.

2. Inventory Status

At the time of closure, all sellable products were removed from the sales floor. Metrc currently reflects 32 packages remaining in active inventory. The Licensee is conducting an in-person physical verification to reconcile these items and will ensure Metrc is accurate and up to date following verification. No destruction or waste of remaining product has occurred, as destruction is not required solely due to temporary closure. Any destruction, if later required, will follow 935 CMR 500.105 with full Metrc documentation.

3. Security and Surveillance

All required security systems remain active and fully operational, including cameras, recording equipment, alarm systems, and remote monitoring. Surveillance footage continues to be captured and stored in compliance with 935 CMR 500.110.

4. Facility Access and Safeguards

Access to the facility is restricted to authorized personnel with active CORI-compliant badges. The Licensee maintains secured entry points and appropriate logging of entry when applicable. All marijuana products remain secured in accordance with regulatory storage requirements.

5. Ongoing Compliance and Next Steps

The Licensee will maintain full compliance with all CCC regulations during the temporary closure, including active security, accurate Metrc inventory, secured facility conditions, and completion of all required regulatory communications. The Commission will be notified prior to resuming operations or making any required filings.

Allan Villatoro, CEO

Discern’d Cannabis Purveyors, Inc.

allan@discerndcannabis.com

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

November 20, 2025

Via email delivery

Allan Villatoro
Discern'd Cannabis Purveyors, Inc.
MR283997
130 Worcester Street, Grafton 01519
allan@discerndcannabis.com

RE: Request for Information – Discern'd Cannabis Purveyors, Inc.

Pursuant to M.G.L. c. 94G, sections 4(a)(xvii) through (xx) and 935 CMR 500.301, 935 CMR 501.301, 935 CMR 500.302, and 935 CMR 502.302, the Commission requests response to the following information:

1. Sales reports from September 1, 2025, to November 1, 2025.
2. Security audits from September 1, 2025, to November 1, 2025.
3. Monthly inventory audits from September 1, 2025, to November 1, 2025.
4. Security camera still shot(s) of any and all Marijuana or Marijuana Products at the Marijuana Establishment as of the date of this letter. Images shall include timestamps.

Within five (5) business days of this request for information, please submit consolidated files to Michalla.DaSilva@cccmass.com.

Failure to cooperate with this request or otherwise comply with the provisions of 935 CMR 500.301, 935 CMR 501.301, 935 CMR 500.302, and 935 CMR 501.302 may result in administrative or disciplinary action against the Licensee.

Sincerely,

Michalla DaSilva

Michalla DaSilva
Investigator

Cc: Ryan Basting, Investigations Manager

DISCERN'D CANNABIS PURVEYORS, INC.

FORMAL RESPONSE TO REQUEST FOR INFORMATION

Discern'd Cannabis Purveyors, Inc.

Allan Villatoro, CEO

License Number: MR283997

Date of Request: November 20, 2025

Submitted on: December 1, 2025

Request for Information

Pursuant to MGL c. 94G sections 4(a)(xvii) through (xx) and 935 CMR 500.301, 935 CMR 501.301, 935 CMR 500.302, and 935 CMR 501.302 the Commission requested the following information:

1. Sales reports from September 1, 2025 to November 1 2025

2. Security audits from September 1, 2025 to November 1, 2025

3. Monthly inventory audits from September 1, 2025 to November 1, 2025

4. Security camera still shots of all Marijuana and Marijuana Products as of the date of the request including timestamps

Response to Requested Information

Item 1: Sales Reports (September 1 to November 1, 2025)

The Licensee has submitted the Monthly Sales Report for the requested period generated through METRC. The report is attached to this response.

Item 2: Security Audits (September 1 to November 1, 2025)

Security audit documentation for the requested period is maintained with on-site records. The Licensee is in the process of retrieving and compiling these materials. All required documentation related to this item will be submitted within five days of this filing.

Item 3: Monthly Inventory Audits (September 1 to November 1, 2025)

Monthly inventory audit records are maintained with on-site operational files. The Licensee is gathering these documents and will provide the complete set within five days.

Item 4: Still Images of Marijuana and Marijuana Products (as of date of request)

Still images with timestamps are being prepared and will be included in the supplemental submission. These images will be provided within five days.

Summary and Compliance Statement

The Licensee has submitted the sales reports within the required time-frame and is finalizing the remaining items. Due to the facility not currently operating and the holiday week immediately preceding this response certain records required in-person retrieval.

All remaining documents will be submitted to the Commission within five days of this filing. The Licensee remains fully cooperative and committed to providing complete accurate and timely information as requested.

Date of Completion for Remaining Items:

December 8, 2025

Submitted by:

Allan Villatoro CEO

Discern’d Cannabis Purveyors Inc.

Monthly Sales

From 9/1/2025 To 11/1/2025

Name Discern'd Cannabis Purveyors, Inc.

License MR283997

Type Marijuana Retailer

Total Records: 12

Month	Item Category	Quantity Sold	Weight Sold	Dollar Amount	Transactions
2025-10	Infused (edible)	26 ea	0 lb	$597.61	17
2025-10	Vape Product	4 ea	0 lb	$0.04	4
2025-10	Buds	0 ea	1.3503 lb	$3,164.01	113
2025-10	Concentrate (Each)	11 ea	0 lb	$199.03	11
2025-10	Infused Pre-Rolls	0 ea	0.0926 lb	$785.88	30
2025-10	Raw Pre-Rolls	0 ea	0.1918 lb	$570.39	44
2025-09	Buds	0 ea	1.7747 lb	$4,932.60	192
2025-09	Concentrate (Each)	63 ea	0 lb	$1,494.06	62
2025-09	Infused (edible)	271 ea	0 lb	$4,805.59	213
2025-09	Infused Pre-Rolls	0 ea	0.2328 lb	$1,414.86	67
2025-09	Raw Pre-Rolls	0 ea	3.2097 lb	$9,045.55	627
2025-09	Vape Product	168 ea	0 lb	$5,241.97	163
	Totals:	**543**	**6.852**	**$32,251.59**	1,543

Outlook

RE: RFI-DISCERND CANNABIS PURVEYORS INC

From Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Date Mon 12/22/2025 9:39 AM
To Allan Villatoro <allan@discerndcannabis.com>
Cc Ryan Basting <Ryan.Basting@cccmass.com>; Armond Enos <Armond.Enos@cccmass.com>

Good morning Allan,

Can you please send over your inventory audits and security audits that was requested in the RFI issued to you on November 20, 2025.

Additionally, can you please send over:

- your waste logs from august 1, 2025 - November 1, 2025
- the camera coverage for the last 5 wasting events
- the camera coverage for the last cash pick up
- any camera coverage from any product transferred out of the establishment
- camera coverage from the last day the establishment was open

Can you please get this to me before the new year.

Thank you and have a great Holiday!

Michalla DaSilva

From: Michalla DaSilva
Sent: Monday, December 15, 2025 11:17 AM
To: Allan Villatoro <allan@discerndcannabis.com>
Cc: Ryan Basting <Ryan.Basting@cccmass.com>; Armond Enos <Armond.Enos@cccmass.com>
Subject: RE: RFI-DISCERND CANNABIS PURVEYORS INC

Good morning Allan,

I am following up with on the RFI. I am still waiting for the submission of your inventory audits and security audits. The previous document submitted stated it will be submitted within 5 days. It has now been 14 days. Please submit requested document by end of business day today.

Thank you,

Michalla DaSilva

Michalla DaSilva, *Investigator*
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
(O) 774-776-3013 **(C)** 774.293.3059

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

December 22, 2025

Allan Villatoro
Discern'd Cannabis Purveyors, Inc.
MR283997
allan@discerndcannabis.com

Date of Notification: December 18, 2025

NOTICE: DEFICIENCY STATEMENT

WHY ARE YOU RECEIVING THIS NOTICE?

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

Regulation:	Deficiency:
935 CMR 500.301(4)	*(4) A Marijuana Establishment or Host Community shall make all reasonable efforts to facilitate the inspection or investigation of an incident or a complaint, including the taking of samples, photographs, video or other evidence or recordings, and complying with demands for examination and inspection in accordance with 935 CMR 500.302.* **Deficiency #1:** As of December 18, 2025, the Licensee has failed to provide Commission Enforcement staff ("ES") with documentation requested via a Request for Information issued on November 20, 2025.

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 Michalla.DaSilva@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 IMPORTANTI! Es dukumentu(s) ten informasons 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 ṢE PÀTÀKÌ! Ìfitónilétí pàtàkì wà nínú (àwọn) ìwé yìí tí ó lè ní ipa lórí ìbéèrè fún ìwé àṣẹ tàbí ìwé àṣẹ rẹ. Ó ṣe kókó kí ìfitónilétí inú ìwé yìí yé ọ. Jọ̀wọ́ túmọ̀ rẹ̀ lójúkan náà.

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

 Enforcement Exhibit 8

Outlook

Upcoming expiration for MR283997

From Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Date Mon 1/5/2026 2:51 PM
To Allan Villatoro <allan@discerndcannabis.com>
Cc Ryan Basting <Ryan.Basting@cccmass.com>; CCC Licensing <licensing@cccmass.com>

Good afternoon Allan,

This email is to make you aware of the impending expiration on your license MR283997 on January 8, 2026, and whether the plan is to submit renewals, a request for extension, or let the license lapse.

Please reach to CCC Licensing at licensing@cccmass.com if you have not already done so for status.

Thank you,

Michalla DaSilva

Michalla DaSilva, *Investigator*
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
(O) 774-776-3013 **(C)** 774.293.3059
Michalla.Dasilva@CCCMass.com

www.MassCannabisControl.com

Outlook

Re: Discern'd Cannabis Purveyors, Inc. (MR283997)

From Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Date Wed 2/11/2026 4:29 PM
To CCC Licensing <licensing@cccmass.com>
Cc Ryan Basting <Ryan.Basting@cccmass.com>

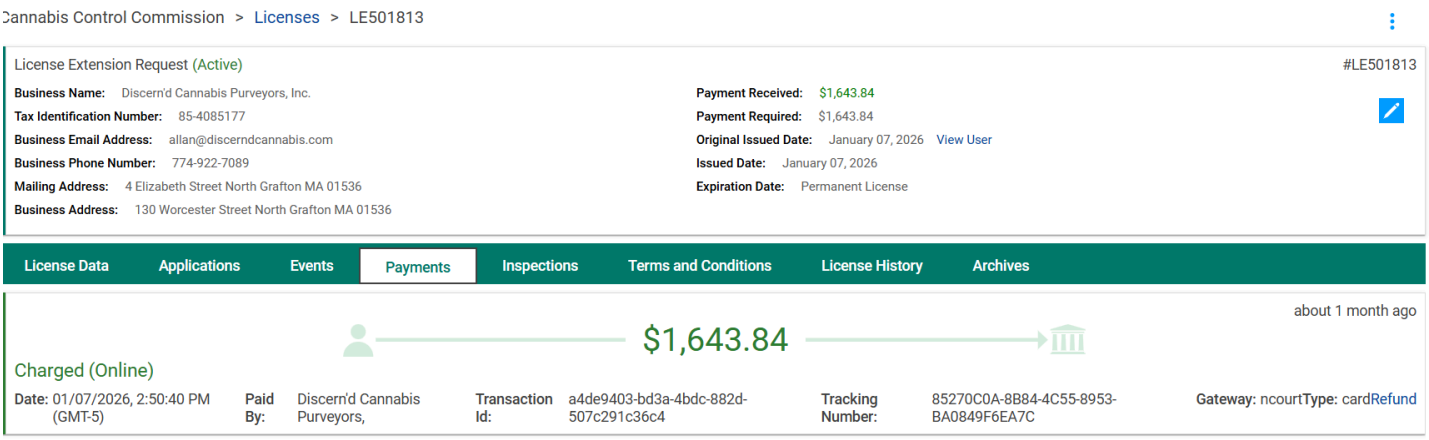
I appreciate the quick response. Thank You!!

From: CCC Licensing <licensing@cccmass.com>
Sent: Wednesday, February 11, 2026 4:27 PM
To: Michalla DaSilva <Michalla.DaSilva@cccmass.com>; CCC Licensing <licensing@cccmass.com>
Cc: Ryan Basting <Ryan.Basting@cccmass.com>
Subject: RE: Discern'd Cannabis Purveyors, Inc. (MR283997)

Hi Michalla,

JD had previously created a License Expiration Extension Request Application in MassCIP. Discern'd submitted this application on 1/6/26 and it was approved on 1/7/26, I cannot locate any email requesting an extension in that timeframe. The application is #LEN501813 that has a corresponding license record (see below photo for a view of the license record). They paid for the extension on 1/7/26 through nCourt through MassCIP.

Please let us know if you need anything else and we will be happy to assist.



Jaime Wakefield, CCCP
Licensing Analyst
Pronouns: She, Her, Hers
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
licensing@cccmass.com
www.MassCannabisControl.com

Considering applying for a Marijuana Establishment or Medical Marijuana Treatment Center license? This is a great place to start: Guidance on Licensure.

Please consider all email communications sent to or received by the Cannabis Control Commission (Commission) to be a matter of public record. Commission emails may be disclosed in response to a request made pursuant to the Public Records Law, G. L. c. 66, §10 and G. L. c. 4, § 7, cl. 26, or in response to other compulsory legal process.

From: Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Sent: Wednesday, February 11, 2026 4:20 PM
To: CCC Licensing <licensing@cccmass.com>

COMMONWEALTH OF MASSACHUSETTS
Cannabis Control Commission

January 22, 2026

Via Electronic Mail
Discern'd Cannabis Purveyors, Inc.
Allan Villatoro
allan@discerndcannabis.com

Letter of Warning – License No. MR283997

Dear Licensee:

The Cannabis Control Commission's ("Commission") Investigations and Enforcement Department ("Enforcement") issues this Letter of Warning ("LOW") to Discern'd Cannabis Purveyors, Inc. ("Licensee") on account of its investigation into the Licensee's non-compliance with 935 CMR 500.301(4). As of the date of this letter, Discern'd Cannabis Purveyors, Inc. has failed to provide the requested documentation or to respond in full to the Request for Information issued on November 20, 2024. Additionally, the Licensee has failed to respond or provide a Plan of Correction to the Notice of Deficiency issued on December 22, 2025 citing the following violation:

1. *935 CMR 500.301(4): A Marijuana Establishment or Host Community shall make all reasonable efforts to facilitate the inspection or investigation of an incident or a complaint, including the taking of samples, photographs, video or other evidence or recordings, and complying with demands for examination and inspection in accordance with 935 CMR 500.302*

On November 20, 2025, Enforcement staff ("ES") issued a Request for Information ("RFI") asking for the Licensee to submit the following:
1. Sales reports from September 1, 2025, to November 1, 2025.
2. Security audits from September 1, 2025, to November 1, 2025.
3. Monthly inventory audits from September 1, 2025, to November 1, 2025.
4. Security camera still shot(s) of any and all Marijuana or Marijuana Products at the Marijuana Establishment as of the date of this letter. Images shall include timestamps.

On December 1, 2025, the Licensee submitted a partial response to the RFI that included Monthly Sales Report for the period of September 1 through November 1, 2025. The response also included written responses for the remaining request summarizing the status of each requested item and statements that the outstanding information would be provided by December 8, 2025.

As of December 8, 2025, the Licensee failed to submit the remaining document. On December 15, 2025 and December 22, 2025 ES emailed the Licensee reminders that the required documents had not been provided.

On December 22, 2025, ES issued a Notice of Deficiency ("NOD") due to the Licensee's continued lack of reasonable efforts to facilitate the Commission's requests.

As of January 7, 2026, ES had not received a NOD response or the outstanding requested documents. ES left a voice mail with the Licensee.

Conclusion:

Within five (5) business days of the date of this Letter of Warning, Discern'd Cannabis Purveyors, Inc. must submit the requested documentation and provide a Plan of Correction to Enforcement. Additionally, the License is set to expire on March 9, 2026, provide a narrative the Licensee plans to take regarding the status of the License and its future operation.

The Licensee shall submit the responses to Michalla.Dasilva@cccmass.com.

ES concludes that the compliance issues above has not been resolved through the Notice of Deficiency and Plan of Correction processes set forth in 935 CMR 500.301(4). Failure to respond may result in suspension, revocation, and denial of renewal applications pursuant to 935 CMR 500.450(4).

Sincerely,

Michalla DaSilva

Michalla DaSilva, Investigator

cc: Ryan Basting, Investigations Manager

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 IMPORTANTI! Es dukumentu(s) ten informasons 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 ṢE PÀTÀKÌ! Ìfitónilétí pàtàkì wà nínú (àwọn) ìwé yìí tí ó lè ní ipa lórí ìbéèrè fún ìwé àṣẹ tàbí ìwé àṣẹ rẹ. Ó ṣe kókó kí ìfitónilétí inú ìwé yìí yé ọ. Jọ̀wọ́ túmọ̀ rẹ̀ lójúkan náà.

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!

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Comm of Mass
Worcester, ss

Westborough District Court
Docket No. 2467SU 000006

Fawaz El-Khawy, Trustee of the Worcester Street Realty Trust, et. al
v.
130 Worcester Street, LLC

AGREEMENT FOR JUDGMENT AS TO POSSESSION

To the clerk of the above named court, judgment shall enter as follows:

1. Judgment for the plaintiffs for possession, execution for possession to issue in the ordinary course.
2. The parties shall attempt to agree as to an amount owed

as to damages. In the absence of an agreement, the parties shall schedule the matter for an assessment of damages at a mutually acceptable time.

3. The defendant by and through its manager, Allan Villatoro, shall provide the plaintiffs with a key/key card and alarm code to enter the premises today so that the plaintiffs may ensure the utilities/heat is operating and that all utilities are operational. Mr. Villatori shall accompany Mr. El-Khoury today to accomplish this.

4. If any repairs due to damage caused by utilities being inoperable are re-

utility accounts to M&E-Khoury today.

8. The defendant shall provide his counsel with the Keycard ~~combination~~ to the vault containing the cannabis product. This ~~combination~~ Key card shall be provided (56) to counsel for the plaintiffs, who shall, if required, provide it to the cannabis control commission or its designee, only.

9. ~~The~~ The defendant shall provide the plaintiffs with the access information for the cameras.

10. The defendant shall leave the personal property, equipment and fixtures in the property as abandoned. The defendant makes no

representations as to whether there are UCC liens on the property on the premises. Plaintiffs shall not be required to remove any property. All property shall be deemed abandoned.

11. The parties shall work in a cooperative manner to implement the terms of this agreement, time being of the essence.

quired, Mr
Violatori shall provide
Mr. El-Khoury and
his tradespeople
immediate access.
5. ~~The~~ The plaintiff
shall provide
defendant's counsel
with a list of
plans plaintiff requires.
6. The parties shall
contact the
Cannabis Control
Commission relative
to the removal of
any cannabis
products.
7. Mr. Violator shall provide
the account nos. for all fees etc.
Tarek El-Khoury, 130 Worcester
Trustee Street,
By his attorney, LLC
By its attorney

Mary W. O'Connor, Esq.

Zachary Gregorius,
Esq

From: Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Sent: Wednesday, February 25, 2026 9:50 AM
To: fawazrelkhoury@gmail.com; Mary O'Connor <moconnor@koilaw.com>; zgregoricus@harrisbeachmurtha.com
Cc: Allan Villatoro <allan@discerndcannabis.com>; Ryan Basting <Ryan.Basting@cccmass.com>; Jerome Hanley <Jerome.Hanley@cccmass.com>
Subject: On-site inspection of 130 Worcester Street

Good afternoon,

On January 28, 2026, Fawaz El-Khoury, as trustee of Zawaf Realty Trust entered into an agreement (the "Agreement") with 130 Worcester Street LLC, attached hereto. Per paragraph 6 of the Agreement both parties were required to contact the Cannabis Control Commission (the "Commission") to facilitate the removal of any cannabis products still remaining on site.

The Commission's Investigations and Enforcement department (the "department") would like to schedule an on-site inspection of 130 Worcester Street, North Grafton, Massachusetts 01536 (the "Property") this Friday, February 27, 2026.

Prior to the inspection the department wishes to confirm that the landlord, Fawaz El-Khoury, or his counsel, has full access to the Property in its entirety, as required by paragraphs 8 and 9 of the Agreement.

During the inspection, the Commission intends to seize any and all Marijuana and Marijuana Product subject to its authority granted by G.L. c. 94G §4(a)(xix), as all personal property, equipment and fixtures have been deemed abandoned by Discern'd Cannabis Purveyors pursuant to paragraph 10 of the Agreement.

Michalla DaSilva

Michalla DaSilva, *Investigator*

Cannabis Control Commission

Union Station

2 Washington Square

Worcester, MA 01604

(O) 774-776-3013 **(C)** 774.293.3059

Michalla.Dasilva@CCCMass.com

www.MassCannabisControl.com

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From: Jerome Hanley
To: Barbara Cooney
Subject: FW: On-site inspection of 130 Worcester Street
Date: Wednesday, August 5, 2026 9:48:40 AM
Attachments: image004.png
image002.png
image003.png
image001.png
image005.png
image001.png
image002.png
image003.png
image004.png

Very respectfully,

Jerome Hanley, *Associate Enforcement Counsel*
Pronouns: Him, He, His
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
(O) 646.838.1582 **(C)** 774.366.5450
Jerome.Hanley@cccmass.com

www.MassCannabisControl.com

From: Michalla DaSilva <Michalla.DaSilva@cccmass.com>
Sent: Monday, March 16, 2026 1:36 PM
To: Jerome Hanley <Jerome.Hanley@cccmass.com>
Subject: Fw: On-site inspection of 130 Worcester Street

From: Allan Villatoro <allan.villatoro@gmail.com>
Sent: Friday, February 27, 2026 11:18 AM
To: Zachary J. Gregoricus <zgregoricus@harrisbeachmurtha.com>
Cc: Michalla DaSilva <Michalla.DaSilva@cccmass.com>; fawazrelkhoury@gmail.com <fawazrelkhoury@gmail.com>; moconnor@koilaw.com <moconnor@koilaw.com>; Ryan Basting <Ryan.Basting@cccmass.com>; Jerome Hanley <Jerome.Hanley@cccmass.com>; Eric J. Gyllenborg <egyllenborg@harrisbeachmurtha.com>
Subject: Re: On-site inspection of 130 Worcester Street

Hi,

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I arrived right around 11:00 and attempted to make contact at the entrance, but I did not connect with anyone on site. I also want to apologize for the late response. I did not see the email notice until yesterday morning, and I was scrambling to make sure I could get there and move some meetings.

Unfortunately, I was not able to remain on site as my vehicle is spilling oil and needed it right away.

Separately, there should be no access issues. The landlord has full access to the property, including the alarm and the safe/vault. I texted him the access information/codes, and we have successfully accessed the premises previously.

I am available by phone if you have any questions.

Best regards,
Allan Villatoro
774-922-7089

On Wed, Feb 25, 2026 at 1:56 PM Zachary J. Gregoricus <zgregoricus@harrisbeachmurtha.com> wrote:

> Inspector DaSilva:
>
> I am confirming receipt of your below email and Mr. Haley's voicemail from this afternoon. I have also forwarded your email and contact information to my client. He will need to be the one to provide you with the combination to the safe or otherwise arrange for access. Thank you.
>
> Zach
>
> **Zachary J. Gregoricus** | Senior Counsel
> Direct: 617.457.4154 | Email: zgregoricus@harrisbeachmurtha.com
>
> 

HARRISBEACHMURTHA.COM
Boston Office | 33 Arch Street, 12th Floor, Boston, MA 02110-2320
617.457.4000 | Fax: 617.482.3868

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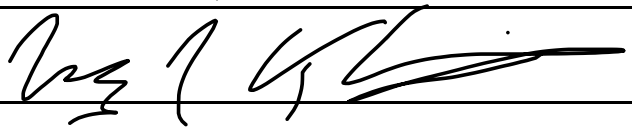
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Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

ACKNOWLEDGEMENT OF INSPECTION

If applicable, a formal notice of deficiencies will be sent to you from your Lead Investigator pursuant to 935 CMR 500.310 and 501.310. The Manager of Record is responsible for investigating and determining the causes of the deficiencies and for preventing the recurrence and occurrence of other deficiencies.

The Manager of Record will provide a Plan of Correction for all observed deficiencies within ten (10) business days and send the plan to the Lead Investigator pursuant to 935 CMR 500.320 and 501.320.

INSPECTION COMPLETION/EXIT INTERVIEW	
I am acknowledging that I have participated in a Marijuana Establishment (ME) Inspection with Commission Investigator(s).	
Licensee Name:	Discern'd Cannabis Purveyors, Inc.
License Number(s):	MR283997
Cash on site	On February 27, 2026 ES counted $154.44 located in the till within the safe. Cash was left in safe with the landlord.
Packages seized	On February 27, 2026 ES seized a total of 28 packages
Manager of Record Print Name:	Fawaz El Khoury
Manager of Record Signature:	
Manager of Record Title:	Landlord

LEAD INVESTIGATOR/COMPLIANCE OFFICER	
Lead Investigator/Compliance Officer:	Michalla DaSilva, Investigator

Date:	February 27, 2026

Note: Marijuana Establishments and Medical Marijuana Treatment Centers are responsible for complying with applicable state laws and regulations.

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> Zach
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> **Zachary J. Gregoricus** | Senior Counsel
> Direct: 617.457.4154 | Email: zgregoricus@harrisbeachmurtha.com
>
> 

HARRISBEACHMURTHA.COM
Boston Office | 33 Arch Street, 12th Floor, Boston, MA 02110-2320
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Michalla DaSilva

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Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Chain of Custody Form

Case Number: _____ Violation: _____
Investigator/Compliance Officer: Michalla DaSilva, Jesse Diamond
Complainant:
ME/MTC License Number(s): Discerned Cannabis Purveyors, Inc. #BBF + Jar of unknown
ME/MTC Address: 130 Worcester St City: Grafton State: MA Zip Code: 01536

Description of Evidence		
Item #	**Quantity**	**Description of Item** (Model, Serial #, Weight, Sample ID, etc.)
1	3.5 g	124698: PP-HYB-SHO-3.5G-TCO
2	5 ea	23678: Tincture – Solar Relief - 500mg
3	16 ea	020827: Tincture – Solar Dream - 500mg
4	18 ea	15220: Cured Sugar | LA Pop Rocks x Mimosa | 2g
5	1 ea	000235: REPLAY-PPVCENER-MANACLN-1G
6	1 ea	000236: Vacation Blue Raspberry 1g AIO Vape Indica
7	1 ea	000237: V(CartCO2)-Vape Product, Durban Poison Essentials Briq Disposable-2g-S
8	1 ea	000238: Vacation Pineapple Coconut 1g AIO Vape Hybrid
9	1 ea	000239: Country Blueberry Dream 510
10	1 ea	000363: V(CartCO2)-Vape Product, Forbidden Fruit Essentials Briq Disposable-2g-I
11	1 ea	000362: sMACs Full Spectrum Tripleberry RSO Gummy 5mg 20pk
12	1 ea	000361: Northern Grown | Fog Cutter Infused Prerolls Mandrin Blossom | 0.5g x 2
13	1 ea	000241: Nectar | Strawberry Cough | 1g Disposable Vape
14	1 ea	000360: Vacation Hash Rosin Gummy Ring 5mg-20pk Pineapple Coconut
15	1 ea	087293: Nectar | Granddaddy Purple | 1g Disposable Vape
16	1 ea	000359: Vacation Tiki Fruit Punch 1g AIO Vape Sativa
17	1 ea	000358: Micro Bar-Pineapple Express
18	1 ea	000355: Nectar | Ghost Train Haze | 1g Disposable Vape
19	1 ea	000247: Nectar | Blueberry Muffin | 1g Disposable Vape
20	1 ea	000250: Incredibles – Vape-Pen (NCD) - 1000mg – Relief (Strawberry 14:1:1 THC:CBD:CBG)

21	1 ea	000251: Incredibles - Vape- Pen (NCD) - 1000mg – Destress (Peaches & Cream 7:1 THC:CBD)
22	1 ea	000269: Incredibles - Vape- Pen (NCD) - 1000mg – Sleep (Huckleberry 14:1:1 THC:CBG:CBN)
23	1 ea	000271: Incredibles - Vape - Pen (NCD) - 1000mg - Sleep (Huckleberry 14:1:1 THC:CBG:CBN)
24	1 ea	000272: Incredibles - Vape - Pen (NCD) - 1000mg - Relief (Strawberry 14:1:1 THC:CBD:CBG)
25	1 ea	000279: Freshly Baked Company: 1g Disposable Vape - Sour Diesel
26	1 ea	000112: Incredibles - Vape - Pen (NCD) - 1000mg - Sleep (Huckleberry 14:1:1 THC:CBG:CBN)
27	1 ea	039644: Choice Chews - 100mg - Blue Raz (S)
28	1 ea	007096: Strawberry Guava 5mg Gummies - 20 pack
29	1 ea	000203: BBF RiverRun Durban Thai x Cindy 99 Preroll .5g
30	2.1g	Unknown Strain - Bud

Chain of Custody				
Item #	**Date/Time**	**From** (Name/Title	**To** (Name/Title)	**Signature**
#1 - # 30	5/18/26 11:07am	Armand Diaz - Co-[illegible] CIE	Michalla DaSilva, Inv.	Michalla DaSilva
#1 - #30	5/18/26	Michalla DaSilva, Inv.	Diem Cranegis	[illegible]

Chain of Custody Form
(Continued)

Final Disposal Authority

Authorization for Disposal

Item(s) #: 1-30 on this document pertaining to (Complainant): _____
is(are) no longer needed as evidence and is/are authorized for disposal by (check appropriate disposal method)

☐ Return to Owner ☑ Destroy

Investigator/Compliance Officer: Michalla DaSilva Signature: Michalla DaSilva Date: 5/18/26

Witness to Destruction of Evidence

Item(s) #: 1-30 on this document were destroyed by Evidence Custodian Diem Cannabis TDMA, LLC d/b/a or Independent Laboratory _____
in my presence on (date) 05/18/26
Name of Witness to destruction: Jesse Diamond Signature: Jesse Diamond Date: 5/18/26

Release to Lawful Owner

Item(s) #: _____ on this document was/were released by Evidence Custodian _____ to
ME/MTC / License Number(s): _____
ME/MTC Address: _____ City: _____ State: _____ Zip Code: _____

Name _____
Address: _____ City: _____ State: _____ Zip Code: _____
Telephone Number: (____) _____
Under penalty of law, I certify that I am the lawful owner of the above item(s).

Signature: _____ Date: _____

Copy of Government-issued photo identification is attached. ☐ Yes ☐ No

This Evidence Chain-of-Custody form is to be retained as a permanent record by the Cannabis Control Commission.

5/18/26

CCC Waste Log: TDMA LLC d/b/a Diem (MR282376)
74 Grafton Street
Worcester, MA 01604

Date & time	Metrc number	Category	Product weight/Qty	Manner of disposal	Disposal location	Agent Name	Agent signature
5/18/26 5:43am	1A40A03000034BD000015220: Cured Sugar | LA Pop Rocks x Mimosa | 2g	Concentrate (Each)	18 ea	Sand | 150	Vault	Tora White	AR3674600
11:54	1A40A03000034BD000020827: Tincture – Solar Dream - 500mg	Concentrate (Each)	16 ea	Sand | 150	↓	↓	↓
11:57	1A40A03000034BD000023678: Tincture – Solar Relief - 500mg	Concentrate (Each)	5 ea	Sand | 150	↓	↓	↓
12:16	1A40A01000020D2000124698: PP-HYB-SHO-3.5G-TCO	Buds	3.5 g	Sand	↓	↓	↓
12:01pm	1A40A03000096650000000235: REPLAY-PPVCENER-MANACLN-1G	Concentrate (Each) Vape	1 ea	Sand | 150	↓	↓	↓
12:02	1A40A03000096650000000236: Vacation Blue Raspberry 1g AIO Vape Indica	Vape Product	1 ea	↓	↓	↓	↓
12:02	1A40A03000096650000000237: V(CartCO2)-Vape Product, Durban Poison Essentials Briq Disposable- 2g-S	Vape Product	1 ea	↓	↓	↓	↓
12:02	1A40A03000096650000000238: Vacation Pineapple Coconut 1g AIO Vape Hybrid	Vape Product	1 ea	↓	↓	↓	↓
12:03	1A40A03000096650000000239: Country Blueberry Dream 510	Concentrate (Each) Vape	1 ea	↓	↓	↓	↓
12:03	A40A03000096650000000363: V(CartCO2)-Vape Product, Forbidden Fruit Essentials Briq Disposable-2g-I	Vape Product	1 ea	↓	↓	↓	↓

CCC Waste Log: TDMA LLC d/b/a Diem (MR282376)
74 Grafton Street
Worcester, MA 01604

12:20	1A40A0300009665000000362: sMACs Full Spectrum Tripleberry RSO Gummy 5mg 20pk	Infused (edible)	1 ea	Sandl 150	Vault	Tora White	Tuttle
12:16	1A40A0300009665000000361: Northern Grown | Fog Cutter Infused Prerolls Mandrin Blossom | 0.5g x 2	Infused Pre-Rolls	1 g				
12:07	1A40A0300009665000000241: Nectar | Strawberry Cough | 1g Disposable Vape	Vape Product	1 ea				
12:20 ~~12:07~~	1A40A0300009665000000360: Vacation Hash Rosin Gummy Ring 5mg-20pk Pineapple Coconut	Infused (edible)	1 ea				
12:20	1A40A030000A1B9000087293: Nectar | Granddaddy Purple | 1g Disposable Vape	Vape Product	1 ea				
12:08	1A40A0300009665000000359: Vacation Tiki Fruit Punch 1g AIO Vape Sativa	Vape Product	1 ea				
12:09	1A40A0300009665000000358: Micro Bar-Pineapple Express	Vape Product	1 ea				
12:09	1A40A0300009665000000355: Nectar | Ghost Train Haze | 1g Disposable Vape	Vape Product	1 ea				
12:09	1A40A0300009665000000247: Nectar | Blueberry Muffin | 1g Disposable Vape	Vape Product	1 ea				
12:09	1A40A0300009665000000250: Incredibles – Vape-Pen (NCD) - 1000mg – Relief (Strawberry 14:1:1 THC:CBD:CBG)	Vape Product	1 ea				

CCC Waste Log: TDMA LLC d/b/a Diem (MR282376)
74 Grafton Street
Worcester, MA 01604

12:11	1A40A0300009665000000251: Incredibles - Vape- Pen (NCD) - 1000mg – Destress (Peaches & Cream 7:1 THC:CBD)	Vape Product	1 ea	Sandi ISO	Vault	Tora White	Tuite
12:11	1A40A0300009665000000269: Incredibles - Vape- Pen (NCD) - 1000mg – Sleep (Huckleberry 14:1:1 THC:CBG:CBN)	Vape Product	1 ea	↓	↓	↓	↓
12:11	1A40A0300009665000000271: Incredibles - Vape - Pen (NCD) - 1000mg - Sleep (Huckleberry 14:1:1 THC:CBG:CBN)	Vape Product	1 ea	↓	↓	↓	↓
12:11	1A40A0300009665000000272: Incredibles - Vape - Pen (NCD) - 1000mg - Relief (Strawberry 14:1:1 THC:CBD:CBG)	Vape Product	1 ea	↓	↓	↓	↓
12:12	1A40A0300009665000000279: Freshly Baked Company: 1g Disposable Vape - Sour Diesel	Vape Product	1 ea	↓	↓	↓	↓
12:12	1A40A0300009665000000112: Incredibles - Vape - Pen (NCD) - 1000mg - Sleep (Huckleberry 14:1:1 THC:CBG:CBN)	Vape Product	1 ea	↓	↓	↓	↓
12:20	1A40A030000BA56000039644: Choice Chews - 100mg - Blue Raz (S)	Infused (edible)	1 ea	ISO/Yard	↓	↓	↓
12:20	1A40A010000733E000007096: Strawberry Guava 5mg Gummies - 20 pack	Infused (edible)	1 ea	↓	↓	↓	↓
12:16	1A40A0300001B59000000203: BBFRiverRun Durban Thai x Cindy 99 Preroll .5g	Pre-roll	1	↓	↓	↓	↓
12:16	Unknown Strain	Bud	2.1g	↓	↓	↓	↓

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Memorandum

To: Travis Ahern, Executive Director
Cc: Andrew Carter, Chief of Staff (CoS); Jessica Porter, Manager of Government Affairs and Policy (MGAP)
From: Matt Giancola, Director of Government Affairs and Policy (DGAP)
Date: August 18, 2026
Subject: Special Policy Report: Cannabis Cultivation Licensing Moratoria in Other Jurisdictions
Importance Level: Routine

PURPOSE: Per the Commission's motion on June 11, 2026, this memorandum reviews cannabis licensing freezes and similar restrictions in other jurisdictions, with a focus on their market effects and impacts on equity applicants and licensees. It identifies common trends and limitations in the available data to provide context for the Commission's temporary cultivation licensing freeze.

BACKGROUND:

I. Introduction

This memorandum reviews cannabis licensing freezes and moratoria in other states, with a focus on restrictions affecting cultivation licenses. It examines why states imposed these restrictions, how they were structured, how they treated existing and prospective licensees, and their effects on cannabis markets and equity applicants and licensees. The states reviewed are Oregon, Oklahoma, Montana, Rhode Island, Washington and Connecticut.

Commission staff conducted independent research and contacted cannabis regulators in selected states about their experience with licensing freezes. Staff asked about changes in licensing, production, prices, market concentration, and equity participation, however few states responded. Publicly available data also did not always allow the effects of a licensing freeze to be separated from other regulatory or market changes occurring at the same time. For these reasons, this memorandum identifies available trends and reported outcomes but does not attribute market or equity changes to a licensing freeze unless supported by available evidence.

II. State Licensing Restrictions

States have restricted cannabis licenses for different reasons. Some initially paused reviewing applications because regulators lacked the staff or resources to process them. Others imposed moratoria in

response to oversupply, declining prices, concerns about business sustainability, enforcement demands, or the number of licenses relative to population or consumer demand.

Oregon, for example, initially paused application processing because of agency workload. The Legislature later authorized restrictions based on cannabis supply and demand and ultimately adopted broader limits on new licenses.[1] Oklahoma imposed a moratorium on new grower, processor, and dispensary licenses beginning in 2022 and has since extended it.[2] Montana has adopted what its Cannabis Control Division describes as a policy that "freezes the footprint" of the state's marijuana industry by restricting new licensed locations.[3]

Rhode Island took a more targeted approach. Its adult-use cannabis law imposed a moratorium specifically on new cultivator licenses while allowing existing medical cultivators to continue operating.[4] Connecticut has not imposed the same type of moratorium. Instead, it controls entry through limited licensing pathways and application periods, including opportunities for certain social equity cultivators and micro-cultivators.[5] Connecticut therefore provides a useful comparison, but not a direct example of a licensing freeze.

These differences matter when evaluating the results of a freeze. Stopping approval of new licenses does not necessarily reduce the number of businesses already operating or the amount of cannabis they can produce. Depending on state law, existing licensees may continue to renew, transfer ownership, relocate, expand, or otherwise operate under its existing licenses. A licensing freeze therefore limits new market entry, but it does not necessarily limit existing production capacity.

A. Oregon

Oregon has one of the longest-running cannabis licensing restrictions in the country. Its current framework developed through several administrative and legislative actions beginning in 2018. The reasons for restricting licenses have also changed over time with what began as a response to agency workload developed into a broader effort to address oversupply, business sustainability, and the size of the licensed market.

1. Licensing Restriction Overview

In June 2018, the Oregon Liquor and Cannabis Commission ("OLCC") paused the processing of new marijuana license applications. The agency had received more applications than its staff could process while also handling renewals and changes for existing businesses. OLCC reported that applications received by June 15, 2018, totaled 2,210 and were expected to take at least 12 to 14 months

[1] S.B. 218, 80th Leg. Assemb., Reg. Sess. (Or. 2019); H.B. 4016, 81st Leg. Assemb., Reg. Sess. (Or. 2022); H.B. 4121, 82d Leg. Assemb., Reg. Sess. (Or. 2024). See also Or. Liquor & Cannabis Comm'n, *Marijuana Licensing*.
[2] H.B. 3208, 58th Leg., 2d Reg. Sess. (Okla. 2022); H.B. 2095, 59th Leg., 1st Reg. Sess. (Okla. 2023); H.B. 3143, 60th Leg., 2d Reg. Sess. (Okla. 2026).
[3] S.B. 27, 69th Leg., Reg. Sess. (Mont. 2025). See also Mont. Dep't of Revenue, Cannabis Control Div., *Deadline to Apply for a New Licensed Location* (May 21, 2025).
[4] R.I. Gen. Laws § 21-28.11-7(a) (2026).
[5] See Conn. Dep't of Consumer Prot., *Adult-Use Cannabis Cultivator License*; Conn. Dep't of Consumer Prot., *Adult-Use Cannabis Micro-Cultivator License*.

to process.[6] The initial pause was therefore primarily an agency capacity measure rather than an effort to control cannabis supply.

Oregon soon began using licensing restrictions to address market conditions. In 2019, the Legislature enacted Senate Bill 218, which allowed OLCC to refuse to issue new marijuana producer licenses based on the supply of and demand for marijuana.[7] The law also directed OLCC to process certain producer applications received on or before June 15, 2018, and required the agency to report on the effects of the restriction.[8]

At the time, Oregon was experiencing significant cannabis oversupply. OLCC estimated in 2019 that recreational marijuana supply was approximately twice existing demand.[9] The agency also identified declining prices and financial pressure on licensed businesses as consequences of excess supply.[10] The rationale for Oregon's licensing restrictions had therefore expanded beyond agency capacity to include market conditions and the sustainability of existing businesses.

The 2018 administrative pause remained in place for non-producer applications until November 8, 2021. Producer applications remained restricted under Senate Bill 218.[11] During the pause, OLCC continued to prioritize services for existing licensees, including renewals, changes of ownership, and changes of location.

The Legislature expanded the restriction in 2022 through House Bill 4016, which prohibited OLCC from issuing new producer, processor, wholesaler, and retailer licenses through March 31, 2024.[12] The law also allowed OLCC to pause application processing based on available agency resources.[13]

Oregon changed its approach again in 2024. House Bill 4121 replaced the temporary moratorium model with license limits tied to state population.[14] The new framework became operative January 1, 2025 and under this system, the availability of new licenses depends on the number of existing licenses relative to statutory population thresholds.

Oregon's approach has therefore evolved from an administrative pause to a producer-specific restriction based on supply and demand, to a broader moratorium, and ultimately to population-based limits on new licenses.

2. Market Effects

OLCC's own review found that the producer licensing pause did not result in an immediate or apparent reduction in marijuana supply.[15] Instead, total harvests continued to increase as existing producers expanded toward the maximum production capacity allowed under state rules and improved

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[6] Or. Liquor Control Comm'n, *Update on Marijuana Licensing: A Message from Steve Marks, Executive Director, OLCC* 1–2 (Aug. 30, 2018).
[7] S.B. 218, ch. 419, § 1, 80th Leg. Assemb., Reg. Sess. (Or. 2019).
[8] *Id.*
[9] Or. Liquor Control Comm'n, *2019 Recreational Marijuana Supply and Demand Legislative Report* (2019).
[10] *Id.*
[11] Or. Liquor & Cannabis Comm'n, *2021 Recreational Marijuana SB 218 Legislative Report 2* (2021).
[12] H.B. 4016, § 1, 81st Leg. Assemb., Reg. Sess. (Or. 2022).
[13] *Id.*
[14] H.B. 4121, §§ 15–18, 82d Leg. Assemb., Reg. Sess. (Or. 2024).
[15] Or. Liquor & Cannabis Comm'n, *2021 Recreational Marijuana SB 218 Legislative Report*, supra note 11, at 1.

cultivation practices and yields.[16] From 2019 to 2020, total harvested marijuana increased 37% and from 2020 to 2021, yields increased another 39%.[17] Retail sales did not grow at the same rate, however, with sales between January and November 2021 only 8% higher than during the same period in 2020.[18] OLCC concluded that the producer pause may not have significantly affected the growth of total harvests.[19]

The OLCC also reported the number of licensed producers increased during the pause. Oregon had approximately 1,009 active producer licenses in June 2018. That number increased to 1,149 in December 2019, 1,161 in December 2020, and 1,395 by the end of 2021.[20] This occurred in part because OLCC continued processing producer applications that had been submitted before the June 15, 2018 cutoff.[21] Not only were there new licensees entering the market, existing licensees also had room to increase production. Oregon law and OLCC rules allowed producers to increase canopy size over time until reaching the maximum permitted tier. OLCC identified these increases, improved production techniques, and the continued issuance of licenses from the pre-pause application backlog as factors contributing to production growth.

These results show the difference between limiting new license applications and limiting existing production capacity. The pause slowed the addition of new producer applicants, but existing operators continued producing and, in some cases, expanded. OLCC ultimately concluded that although the number of producer licenses did not decline during the pause, the restriction likely prevented the number from increasing at an even faster rate.

Oregon continued to face difficult market conditions after the initial producer pause. In its 2023 supply-and-demand report, OLCC described an industry facing continued economic pressure. The agency reported that business survival had contributed to consolidation through mergers and vertical integration through acquisitions, while even larger multi-state operators were reducing their presence in response to Oregon's market conditions.[22] OLCC also reported that producers continued to adjust production targets while consumer demand remained constrained by the size of Oregon's in-state market.

The available data therefore does not show that restricting new producer licenses alone corrected Oregon's supply imbalance. Existing production capacity, improving yields, pending applications, consumer demand, and broader market conditions continued to affect supply and prices after the restriction took effect.

3. Equity Effects

Oregon does not have a specific equity exemption from its licensing restrictions. According to OLCC, before the moratorium Oregon maintained an open licensing system with no state residency requirement and relatively low application and licensing fees. OLCC estimated that obtaining a license directly from the state cost approximately $5,000.

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[16] *Id.*
[17] *Id.*
[18] *Id.*
[19] *Id.*
[20] *Id.*
[21] *Id.*
[22] Or. Liquor & Cannabis Comm'n, *2023 Recreational Marijuana Supply and Demand Legislative Report: Letter from OLCC Director Steve Marks* 1–2 (2023).



The restrictions changed the pathway for new businesses seeking to enter the market. During the licensing pause, a change of ownership became the primary (and for producers at times the only) way for a new operator to enter the licensed market.[23] OLCC reported that this created a secondary market for licensed businesses, with new operators paying existing businesses a premium for the opportunity to obtain a producer license.[24]

This created a higher financial barrier for prospective market entrants. A business that previously could seek a new license directly from the state instead needed sufficient capital to acquire an existing licensed business or license interest. According to information subsequently provided by OLCC to Commission staff, licenses have been acquired for substantially more than the approximately $5,000 previously required to obtain a license directly from the agency.

The available information does not show whether this change disproportionately affected equity applicants. OLCC did not identify data showing a measurable decrease in equity applications or licenses during the moratorium. Oregon's experience therefore shows an increased barrier to new market entry generally, but available data does not establish a specific effect on equity applicants or businesses.

The effects may also differ between prospective applicants and existing businesses. Prospective applicants face fewer and potentially more expensive opportunities to enter the market. Existing businesses, including equity-owned businesses, may benefit from fewer new competitors. Available data do not quantify either effect.

4. Other Observed Effects

The development of a secondary market for existing licenses was one of the clearest unintended effects identified by OLCC. Following the pause, the agency saw increased requests to change the ownership and location associated with pending applications. In some cases, applicants were effectively selling their application and their position in the licensing queue. OLCC ultimately adopted rules restricting certain changes to pending applications.[25]

The same pattern occurred with existing licenses. OLCC reported that the pause increased the value of producer licenses and made changes of ownership more attractive than allowing licenses to expire or be surrendered.[26] During the broader administrative pause, acquiring an existing licensed business also became a practical route for new operators seeking to enter the market.[27]

The pause had a more positive effect on agency operations. OLCC reported that it used the period to reduce its licensing backlog and streamline application processing. Average license-processing times had increased from 90 days in 2016 to 148 days in 2019. Process changes implemented during the pause substantially reduced assignment and processing times by 2021.[28] When OLCC resumed processing new non-producer applications in November 2021, it did not experience the large surge in applications that agency staff had anticipated.[29]

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[23] Or. Liquor & Cannabis Comm'n, *2021 Recreational Marijuana SB 218 Legislative Report*, supra note 11, at 5–7.
[24] *Id.*
[25] *Id.* at 7.
[26] *Id.* at 6.
[27] *Id.* at 5-7.
[28] *Id.* at 4.
[29] *Id.* at 1, 5-6.

OLCC did not report litigation associated with its current licensing framework and could not determine whether the restrictions increased illicit-market activity or investment uncertainty. More broadly, the state's later market reports show that consolidation and financial pressure continued despite licensing restrictions. In 2023, OLCC reported that difficult market conditions were contributing to mergers, acquisitions, and vertical integration as businesses sought to remain viable.[30]

Oregon's experience therefore shows that a licensing restriction can slow new market entry without necessarily reducing production. It can also increase the value of existing licenses and encourage secondary-market transactions. At the same time, Oregon's initial pause provided the agency time to address its licensing backlog and improve processing times.

B. Oklahoma

Oklahoma imposed a statewide moratorium on new medical marijuana business licenses in 2022 after several years of rapid growth in its cannabis market. The moratorium covered new growers, processors and dispensaries from opening but does not prevent existing businesses from renewing their licenses. The moratorium was originally scheduled to terminate in 2024 but has been extended twice and now remains in place through 2028.

1. Licensing Restriction Overview

Oklahoma established its medical marijuana program after voters approved State Question 788 in 2018. The state's early licensing system allowed broad entry into the commercial market and did not cap the number of business licenses. The market grew quickly. By 2022, Oklahoma had thousands of licensed cannabis businesses, including a large number of growers and the Oklahoma Medical Marijuana Authority ("OMMA") was experiencing significant bandwidth issues and processing delays.

In 2022, the Oklahoma Legislature enacted House Bill 3208, which authorized OMMA to stop issuing new grower, processor, and dispensary licenses.[31] The moratorium took effect August 26, 2022 but allowed for existing businesses to continue operations and renewal of their licenses.[32]

The moratorium was intended, in part, to give OMMA time to address its existing regulatory workload. The law allowed the moratorium to remain in place until OMMA's Executive Director determined that all pending licensing reviews, inspections, and investigations were complete.[33] The moratorium was initially scheduled to end August 1, 2024 but in 2023, the Legislature extended it to August 1, 2026.[34] Oklahoma extended it again in 2026, moving the end date to August 1, 2028 with the caveat that the Executive Director retains authority to end the moratorium earlier if the statutory conditions are met.[35]

While the moratorium limits new licenses from entering the market, it does not reduce the number of existing licenses on its own. Existing growers may continue operating and renewing its

[30] Or. Liquor & Cannabis Comm'n, *2023 Recreational Marijuana Supply and Demand Legislative Report: Letter from OLCC Director Steve Marks*, supra note 22, at 1–2.
[31] H.B. 3208, 58th Leg., 2d Reg. Sess. (Okla. 2022).
[32] Okla. Med. Marijuana Auth., *Grower License*.
[33] H.B. 3208, 58th Leg., 2d Reg. Sess. (Okla. 2022).
[34] H.B. 2095, 59th Leg., 1st Reg. Sess. (Okla. 2023).
[35] H.B. 3143, 60th Leg., 2d Reg. Sess. (Okla. 2026); Okla. Med. Marijuana Auth., *Grower License*, supra note 32.

licenses; therefore, any reduction in Oklahoma's active grower population depends on existing businesses leaving the market through closure, nonrenewal, surrender, or enforcement.

2. Market Effects

Oklahoma commenced the moratorium in 2022 with a large licensed cannabis market. The number of active businesses has since declined, including a substantial reduction in licensed growers. The moratorium contributed to this decline by preventing new growers from replacing businesses that left the market. It did not, however, cause existing licenses to expire or require businesses to close.

Oklahoma also increased its regulatory oversight of existing businesses through stronger licensing requirements, inspections, inventory tracking, and enforcement. OMMA has suspended and revoked licenses, while other businesses have voluntarily surrendered licenses or chosen not to renew.[36] License counts had started to decline before the moratorium took effect. OMMA reported a notable drop between December 2021 and January 2022 due to changes in how expired licenses were treated and an increase in voluntary license surrenders.[37]

As a result, license counts alone do not show the full effect of the moratorium. A decline in grower licenses after August 2022 reflects several factors: the lack of new licenses entering the market, existing businesses closing or not renewing, and licenses being removed through enforcement.

A similar distinction applies to cannabis production. Fewer grower licenses do not necessarily mean a proportional reduction in cannabis supply. Existing growers remained in operation, and the moratorium did not directly restrict how much they could produce within their authorized operations. The number of grower licenses therefore does not, on its own, show how much cultivation capacity remained in the market.

Oklahoma continued to experience significant oversupply after the moratorium took effect. In 2023, an OMMA-commissioned supply-and-demand study found that the state had at least 32 times more regulated medical cannabis than needed to meet demand from licensed patients.[38] The study found that the lack of caps on cultivation licenses contributed to the influx of growers and that the lack of limits on the amount each grower could produce contributed to the state's oversupply.[39] Existing growers also remained eligible to renew their licenses during the moratorium, allowing existing cultivation capacity to remain in the market.[40]

Oklahoma also experienced substantial price declines as the market became oversupplied, although much of the decline occurred before the moratorium took effect. Wholesale cannabis prices fell approximately 59% from a 2020 high of $2,229 per pound to a 2022 low of $915 per pound. By December 2021, Oklahoma had more than 9,400 cultivation licenses serving approximately 384,500 registered patients, or about one cultivator for every 41 patients.[41]

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[36] See Okla. Med. Marijuana Auth., *Compliance Information*.
[37] Okla. Med. Marijuana Auth., *Licensing and Tax Data*.
[38] Cannabis Pub. Pol'y Consulting, *Empirical Assessment of Oklahoma's Medical Marijuana Market* 5 (2023), Oklahoma Medical Marijuana Authority; Okla. Med. Marijuana Auth., *OMMA Releases Findings of Medical Marijuana Supply and Demand Study* (June 21, 2023), Oklahoma Medical Marijuana Authority
[39] Cannabis Pub. Pol'y Consulting, *Empirical Assessment of Oklahoma's Medical Marijuana Market*, supra note 38.
[40] Okla. Med. Marijuana Auth., *Grower License*, supra note 32.
[41] Cannabis Benchmarks, *What Drove Oklahoma Cannabis Prices So Low?* (Nov. 2, 2022), Cannabis Benchmarks.

In summation, the moratorium stopped new cultivators from entering the market, but existing growers could continue operating and producing cannabis. As a result, the freeze did not reduce the cultivation capacity already in place and oversupply continued, with wholesale prices remaining among the lowest in the country.[42]

3. Equity Effects

Oklahoma does not have a cannabis social equity licensing program, and the moratorium also does not include an equity exemption or separate pathway for equity applicants.

4. Other Observed Effects

The duration of Oklahoma's moratorium is notable. What began as a two-year restriction scheduled to end in 2024 has now been extended through 2028, unless OMMA ends it earlier.

The extensions also highlight how the criteria for ending a licensing freeze can affect its duration. Oklahoma did not tie reopening to a fixed number of licenses, cannabis prices, production levels, or another market benchmark. Instead, the law ties the end of the moratorium to OMMA's completion of pending licensing reviews, inspections, and investigations.[43] The Legislature has extended the statutory deadline as that work has continued.

The moratorium has also operated alongside a broader enforcement effort. OMMA conducts inspections and investigations and has taken action against businesses for licensing and inventory-tracking violations. Recent enforcement actions have involved large quantities of marijuana and thousands of plants that were not properly tracked in the state's inventory system.[44]

These overlapping changes make it difficult to identify the moratorium's full effect on its own. Oklahoma's licensed market has contracted, but the moratorium is only one factor. New businesses have been prevented from entering while existing businesses have left through ordinary attrition, voluntary surrender, nonrenewal, and enforcement.

C. Montana

Montana has restricted new cannabis licenses since adult-use sales began in 2022. The state initially limited entry to businesses already participating in the medical marijuana market. It later extended that restriction and, in 2025, adopted a broader two-year limit on new licensed locations. The current policy, referred to by the state as "Freeze the Footprint," generally allows existing businesses and locations to continue operating but prevents the addition of new licensed premises.

1. Licensing Restriction Overview

Montana voters approved adult-use marijuana in 2020, with sales beginning January 1, 2022. The state's initial adult-use framework did not immediately open licensing to all new applicants. Instead, from January 1, 2022, through June 30, 2023, new cultivation, manufacturing, and dispensary licenses were

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[42] Cannabis Pub. Pol'y Consulting, *Empirical Assessment of Oklahoma's Medical Marijuana Market* 15 (2023), Oklahoma Medical Marijuana Authority; Cannabis Benchmarks, *What Drove Oklahoma Cannabis Prices So Low?* (Nov. 2, 2022), Cannabis Benchmarks.

[43] H.B. 3143, 60th Leg., 2d Reg. Sess. (Okla. 2026).

[44] See, e.g., Okla. Med. Marijuana Auth., *Emergency Order of Summary Suspension and Embargo: Redbud Relief Farms, LLC* (Feb. 10, 2026); Okla. Med. Marijuana Auth., *Emergency Order of Summary Suspension and Embargo: Ohana Canna LLC* (Feb. 17, 2026).

generally limited to businesses that held or had applied for a medical marijuana license on or before April 27, 2021.[45] The law included limited exceptions, including testing laboratories, marijuana transporters, and combined-use licenses available to Montana's federally recognized tribes or qualifying businesses majority-owned by a tribe.[46]

The restriction gave existing medical marijuana businesses the first opportunity to participate in the adult-use market while limiting new businesses from entering. Existing licensees could continue operating and were not limited to their original cultivation capacity. Montana law allowed cultivators to increase their licensed cultivation tier if they met applicable requirements.[47] As a result, the moratorium restricted new businesses without necessarily restricting the ability of existing cultivators to expand production.

The Legislature extended the moratorium in 2023 through House Bill 128 moving the end of the restriction from July 1, 2023, to July 1, 2025.[48] The Legislature assigned the Economic Affairs Interim Committee to study the implementation effects and while they specifically considered extending the moratorium on new licenses, and the Committee ultimately advanced legislation extending it for another two years.[49]

Montana changed its approach again in 2025. Senate Bill 27 extended restrictions through June 30, 2027, and imposed a broader limit on additional licensed premises.[50] The Montana Department of Revenue describes the policy as "Freeze the Footprint." Under this law, existing licensed premises may generally continue operating and may be moved or transferred, but businesses cannot add additional premises during the restriction. Applications for new locations had to be complete by June 30, 2025, to proceed without being affected by the freeze.[51]

The 2025 law therefore changed the nature of Montana's restriction with the earlier moratorium largely limiting who could enter the licensed market and the current restriction focusing on the overall number of licensed locations. The new law permits existing businesses to remain in the market, and licenses and locations may change hands, but the state's existing licensed footprint generally cannot grow until the restriction ends.

2. Market Effects

Montana's licensing restrictions have operated during a period of substantial growth in the state's adult-use market. Adult-use sales began in 2022, meaning that changes in sales, production, prices, and the number of businesses during the moratorium also reflect the transition from a medical-only market to a broader adult-use market.

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[45] Mont. Code Ann. § 16-12-201 (2021); see also Mont. Dep't of Revenue, Cannabis Control Div., Marijuana Laws and Rules.
[46] Mont. Code Ann. §§ 16-12-201, -225 (2021).
[47] Mont. Code Ann. § 16-12-223 (2021). See also H.B. 128, 68th Leg., Reg. Sess. (Mont. 2023) (clarifying legislative intent regarding a cultivator's ability to increase tiers).
[48] H.B. 128, ch. 712, 68th Leg., Reg. Sess. (Mont. 2023).
[49] Mont. Leg., Econ. Affs. Interim Comm., *SJ 31—Study the Implementation of Montana's Recreational Marijuana Program* (Sept. 2022) (documenting the committee's amendment extending the moratorium on new licenses from 2023 to 2025).
[50] S.B. 27, 69th Leg., Reg. Sess. (Mont. 2025).
[51] Mont. Dep't of Revenue, Cannabis Control Div., *2025 Legislative Updates: New Cannabis Laws in Montana* (May 20, 2025).

The restrictions did not freeze existing cultivation capacity. Existing cultivators remained in operation and could increase their cultivation tier when they met applicable requirements.[52] This allowed production capacity to grow even while most new businesses were prevented from obtaining cultivation licenses. This distinction is important when considering the effect of the moratorium on supply. Limiting the number of new cultivators does not necessarily limit how much cannabis existing cultivators can produce. A market may therefore add cultivation capacity without adding the same number of new businesses.

Available state revenue data also show that Montana's adult-use market continued to generate substantial sales and tax revenue during the licensing restriction. The Department of Revenue reported approximately $47.6 million in adult-use cannabis tax collections in Fiscal Year 2023 and $49.7 million in Fiscal Year 2024.[53] These figures show continued activity and growth in the adult-use market but do not, on their own, establish the effect of the licensing moratorium.

Further, the current "Freeze the Footprint" policy took effect on July 1, 2025 and is scheduled to end on June 30, 2027 but does not yet show whether the restriction has materially affected production, prices, sales, or market concentration.[54]

The available information also does not establish that Montana adopted the current restriction specifically to reduce cannabis supply or increase prices. The 2025 policy instead focuses on limiting additional licensed locations while the existing market continues to operate.

3. Equity Effects

While Montana does not have a cannabis social equity licensing program comparable to Massachusetts, they did provide a limited alternative pathway for tribal participation. State law authorized combined-use marijuana licenses for each federally recognized tribe in Montana or a business that was majority-owned by a tribe. A combined-use license includes cultivation and dispensary authority.[55] This exception provided a pathway into the market that was not available to most other new applicants during the moratorium.

4. Other Observed Effects

Montana's experience shows how a temporary restriction can evolve as a cannabis market develops. The initial limitation on new licenses was scheduled to end in 2023 but was extended to 2025 and was then followed by a new restriction on additional licensed locations through June 2027.

The rationale has also shifted. The initial moratorium was part of Montana's transition from its existing medical marijuana program to adult-use sales. By 2025, the focus had moved toward the number of cannabis locations operating across the state. When Senate Bill 27 was considered, Montana had roughly 500 dispensaries, and the Cannabis Control Division projected that hundreds of additional locations could enter the market over the following two years without further restrictions.[56]

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[52] Mont. Code Ann. § 16-12-223; H.B. 128, 68th Leg., Reg. Sess. (Mont. 2023).
[53] Mont. Dep't of Revenue, *Biennial Report 2024* (2024).
[54] S.B. 27, 69th Leg., Reg. Sess. (Mont. 2025); Mont. Dep't of Revenue, Cannabis Control Div., *2025 Legislative Updates: New Cannabis Laws in Montana*, supra note51.
[55] Mont. Code Ann § 16-12-225 (2021).
[56] John Hooks, *Bill Would Cap the Number of Marijuana Dispensaries Across the State*, Mont. Pub. Radio (Feb. 26, 2025).

The limitation now in effect does not completely close the market. Existing businesses may transfer or relocate licensed premises, allowing ownership and business activity to change while the total footprint remains restricted. Allowing transfers provides a path for new operators to enter by acquiring an existing business or location. With the current restriction only being in place for a short period, there is not yet enough information to determine whether the "Freeze the Footprint" effect has been achieved.

Montana's experience thus far shows the difference between freezing market entry and freezing market growth. Its initial moratorium restricted most new businesses from obtaining licenses while existing cultivators could continue operating and expanding. Its current approach allows businesses and licenses to change hands but generally prevents the state's licensed footprint from growing.

D. Rhode Island

Rhode Island placed a moratorium on new cannabis cultivator licenses when it legalized adult-use cannabis in 2022. Existing medical cultivators were exempt and could supply both the medical and adult-use markets. The state also required the Cannabis Control Commission ("RI CCC") to study whether existing cultivators could meet market demand before additional licenses were issued.

1. Licensing Restriction Overview

The Rhode Island Cannabis Act placed a moratorium on new cultivator licenses until two years after the RI CCC issues its final regulations. The moratorium does not apply to cultivators licensed under the state's medical marijuana program before the Cannabis Act took effect. Beginning August 1, 2022, those cultivators could become hybrid cultivators and produce cannabis for both the medical and adult-use markets.[57]

Rhode Island already had a limited cultivation market when the moratorium began. The state held one application period for medical cultivators between October 2016 and April 2017 and received 117 applications. By 2023, 65 cultivation licenses were active.[58]

The Cannabis Act also required the RI CCC to monitor whether the moratorium affected cannabis supply. The Commission was directed to review production, inventory, sales, market conditions, and other factors and report if the moratorium prevented the market from meeting demand. It was also required to complete a study by May 1, 2024, on the availability of cannabis and whether additional cultivator licenses were needed.[59]

The RI CCC completed that review in April 2024 and found that existing cultivators could meet current and expected demand.[60] The moratorium remains in state law as of 2026. Once it ends, the RI CCC may issue additional cultivator licenses, but it is not required to do so. In making that decision, the Commission must consider the findings of its cultivation report.[61]

2. Market Effects

Rhode Island's review found that existing cultivators had enough capacity to meet demand without adding new licenses. At the time of the study, 24% of the state's licensed cultivation and

[57] R.I. Gen. Laws § 21-28.11-7(a)–(b) (2026).
[58] R.I. Cannabis Control Comm'n, *Cultivation License Moratorium Report* 4–5 (Apr. 12, 2024).
[59] R.I. Gen. Laws §§ 21-28.11-7(c), -8 (2026).
[60] R.I. Cannabis Control Comm'n, *Cultivation License Moratorium Report*, supra note 58, at 3, 17.
[61] R.I. Gen. Laws § 21-28.11-7(a), (d) (2026).

production space was not being used. This left about 97,500 square feet of existing licensed space available for additional production.[62]

Production also grew faster than retail sales after adult-use sales began. During 2023, retail sales increased 24%, while wholesale production increased 584%.[63] Cultivator inventories grew at the same time. Bulk flower and trim held in reserve increased 57%, leaving more than 5 million grams in cultivator inventories by the end of the year.[64] The RI CCC also found that retail sales had leveled off at about $9 million per month by the end of 2023 and into early 2024.[65] Based on these trends, the Commission concluded that existing cultivators could meet increased demand and did not identify a need for additional cultivation licenses.[66]

More recent industry feedback points to continued pressure from oversupply. In its 2025 diversity report, the RI CCC found that some cultivators viewed oversupply and the limited number of retail outlets as barriers to growth. Cultivators also reported that industry contraction and oversupply made cannabis businesses harder to finance.[67] The report was based on responses from 13 licensees, so these findings reflect industry feedback rather than a full market assessment.

3. Equity Effects

While Rhode Island has a social equity program, the cultivator moratorium does not include an exception for social equity applicants. The state's new social equity licenses are focused on retail rather than cultivation. As a result, prospective social equity cultivators are subject to the same moratorium as other new cultivation applicants.

In addition, the RI CCC's 2025 diversity report instead identified broad barriers to entering the cannabis market including zoning and municipal approvals, licensing complexity, legal costs, access to capital, and cultivators raised concerns about market saturation and oversupply.[68]

4. Other Observed Effects

Rhode Island's moratorium includes a built-in review of market conditions. The Legislature required the RI CCC to monitor supply during the moratorium and report if the restriction prevented the market from meeting demand. It also required the Commission to study whether additional cultivators would be needed.[69]

However, the 2024 review found the opposite. Existing cultivators had unused capacity, production was growing faster than retail sales, and inventories were increasing. The RI CCC found that the existing market could meet increased demand.[70] The state also retained flexibility for what happens after the moratorium. Once the restriction expires, the RI CCC may issue additional cultivator licenses after considering the market data in its report. New licenses do not automatically become available simply because the moratorium ends.

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[62] R.I. Cannabis Control Comm'n, *Cultivation License Moratorium Report*, supra note 58, at 13.
[63] *Id.*
[64] *Id.* at 3.
[65] *Id.*
[66] *Id.* at 3, 17.
[67] R.I. Cannabis Control Comm'n, *Diversity in the Cannabis Industry: 2025 Annual Report* 4–6 (2025).
[68] R.I. Cannabis Control Comm'n, *Diversity in the Cannabis Industry: 2025 Annual Report*, supra note 67, at 4–6.
[69] R.I. Gen. Laws §§ 21-28.11-7(c), -8 (2026).
[70] R.I. Cannabis Control Comm'n, *Diversity in the Cannabis Industry: 2025 Annual Report* 4–6 (2025).

Rhode Island's approach ties future cultivation licenses to market need rather than the expiration of the freeze alone. The state restricted new licenses monitored whether existing cultivators could meet demand and retained the option to add licenses if more capacity is needed.

E. Washington

Washington has restricted new cannabis producer and processor licenses for several years as part of a broader system that limits entry into its adult-use market. Unlike Oregon or Oklahoma, the restriction was not adopted as a temporary moratorium with a set end date. The state generally does not accept applications for new producer or processor licenses. More recently, however, Washington created a limited exception that allows certain producer and processor licenses to be issued through its Social Equity in Cannabis Program.[71]

1. Licensing Restriction Overview

Washington voters approved adult-use cannabis through Initiative 502 in 2012.[72] The law created separate producer, processor, and retailer licenses overseen by the Washington State Liquor and Cannabis Board ("LCB").[73] Washington's licensing system has historically given the LCB authority to control the number of businesses operating within the regulated market.

Currently, the LCB currently does not accept applications for new cannabis producer, processor, or retailer licenses through its general licensing process.[74] The LCB continues to process existing producer and processor renewals, changes involving existing licenses, including changes of location, ownership interests, and certain assumptions of existing businesses.[75] Washington's restriction is therefore different from the temporary freezes used elsewhere as there is no general application window that automatically reopens after a fixed period or when a specific market condition is met. Instead, new producer and processor licenses are generally unavailable unless the Legislature or LCB creates a specific pathway for issuing them.

The most significant exception to the restriction on new licenses is Washington's Social Equity in Cannabis Program. The Legislature established the program in 2020 and expanded it in 2023 to include producer and processor licenses.[76] Under current law, producer and processor licenses that were forfeited, revoked, or canceled may be reissued to qualifying social equity applicants. The law also allows up to 100 processor licenses and, beginning January 1, 2025, up to 10 producer licenses issued together with processor licenses through the program.[77] Washington therefore operates a largely closed producer and processor market but has created a limited pathway for new entry specifically for social equity applicants.

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[71] Wash. State Liquor & Cannabis Bd., *Cannabis Licensing*; Wash. Rev. Code § 69.50.335 (2026).
[72] Initiative Measure No. 502, 2013 Wash. Sess. Laws 1; Wash. Rev. Code § 69.50.325 (2026).
[73] *Id.*
[74] Wash. State Liquor & Cannabis Bd., *Cannabis Licensing*, supra note 70; Wash. Rev. Code § 69.50.325(1)–(2) (2026).
[75] Wash. Rev. Code § 69.50.325(1)–(2) (2026); Wash. State Liquor & Cannabis Bd., *Apply for a Cannabis License*.
[76] Engrossed Second Substitute H.B. 2870, ch. 236, 66th Leg., Reg. Sess. (Wash. 2020); S.B. 5080, ch. 220, 68th Leg., Reg. Sess. (Wash. 2023).
[77] Wash. Rev. Code § 69.50.335(1)(a)–(b) (2026).

2. Market Effects

As Washington's restriction is part of a longstanding controlled licensing system, there is no clear before-and-after period for measuring its effect on production, prices, or sales. This makes Washington not a great use case for determining whether a licensing freeze can address an existing oversupply problem.

While the restriction limits the addition of new producer businesses, existing producers may continue producing cannabis.[78]. Existing licenses may also continue to transfer ownership, change location, changes in governing people or ownership percentages, and merge existing businesses.[79] The restriction therefore limits the creation of new licenses without freezing activity involving licenses already in the market. This distinction is important when considering the effect on cannabis supply. Washington's closed licensing system limits the number of new producers that can enter the market, but it does not establish a direct limit on the amount of cannabis produced by existing businesses. Changes in production, prices, and sales therefore depend on the operations of existing licensees and broader market conditions, not only on whether new producer licenses are available.

3. Equity Effects

Rather than exempting equity applicants from a temporary moratorium, Washington created a specific equity pathway within an otherwise closed licensing system. Washington established its Social Equity in Cannabis Program in 2020 to reduce barriers to ownership for people and communities disproportionately harmed by cannabis prohibition.[80] The Legislature initially focused the program on retail licenses. In 2023, Senate Bill 5080 expanded the program to include a limited number of producer and processor licenses.[81]

The current Washington law allows certain producer and processor licenses that were forfeited, revoked, or canceled to be reissued to social equity applicants through July 1, 2032. It also authorizes up to 100 processor licenses and up to 10 producer licenses, with the producer licenses issued together with processor licenses for combined business models.[82] These licenses are not available to the general applicant population and must be used by a social equity applicant. To qualify, a social equity business must be at least 51% owned and controlled by individuals who meet specified criteria related to residence in a disproportionately impacted area, cannabis-related arrests or convictions, household income, or social and economic disadvantage.[83]

This limited pathway remains small compared with the broader licensed market. LCB reports that the Social Equity Program issued three licenses in Fiscal Year 2024, six in Fiscal Year 2025, and four in Fiscal Year 2026 across the program.[84] These figures do not show the effect of the licensing restriction on equity ownership as a whole, but they show that Washington has used otherwise unavailable licenses to create targeted opportunities for social equity applicants.

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[78] *Id.*
[79] Wash. State Liquor & Cannabis Bd., *Apply for a Cannabis License*, supra note 74.
[80] Wash. State Liquor & Cannabis Bd., *Cannabis Social Equity*.
[81] S.B. 5080, ch. 220, 68th Leg., Reg. Sess. (Wash. 2023).
[82] Wash. Rev. Code § 69.50.335(1)(a)–(b) (2026).
[83] Id. § 69.50.335; Wash. State Liquor & Cannabis Bd., *Cannabis Social Equity*, supra note 79.
[84] Wash. State Liquor & Cannabis Bd., *Cannabis Social Equity*, supra note 79.

4. Other Observed Effects

Washington's experience shows that a restriction on new licenses does not have to operate as a complete bar to market entry. The state has maintained its general restriction while allowing specific licenses to be issued or reissued through the Social Equity in Cannabis Program. The use of forfeited, revoked, or canceled licenses is also notable because rather than allowing those licenses to disappear from the market or reopening them to the general applicant pool, Washington has reserved qualifying licenses for social equity applicants.[85] This allows the state to create new ownership opportunities without broadly increasing the number of licenses available.

Existing licenses also remain active assets within the market. Businesses may seek approval for changes in location, ownership, or other licensing changes even though new producer and processor applications are generally unavailable. The restriction therefore controls new license issuance without preventing existing licenses from being transferred or modified.

Washington's experience does not show whether a licensing freeze reduces oversupply or stabilizes prices. Instead, it shows how a state can restrict new licenses while maintaining a limited pathway for equity applicants.

F. Connecticut

Connecticut has not imposed a formal cultivation moratorium like several of the states discussed above. Instead, the state controls new cannabis licenses through limited application periods and lotteries. As of 2026, no cannabis license lotteries are open, and new cultivator licenses are not currently available through the lottery process.[86]

1. Licensing Restriction Overview

Connecticut legalized adult-use cannabis in 2021 and gave the Department of Consumer Protection ("DCP") authority to license and regulate cannabis businesses. The state did not create an open licensing system. Instead, DCP determines the number of licenses available during each application round and uses lotteries when applications exceed the number available.[87]

Cultivation has been more restricted. Connecticut created a one-time application period from February 3 to March 3, 2022, for qualifying social equity applicants seeking cultivator licenses in disproportionately impacted areas.[88] These applicants could apply without participating in a lottery or request for proposals.[89]

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[85] Wash. Rev. Code § 69.50.335(1)(a) (2026).
[86] Conn. Dep't of Consumer Prot., *Adult-Use Cannabis Cultivator License* (June 12, 2024) (stating that cultivator licenses are not currently available through the lottery); Conn. Dep't of Consumer Prot., *Cannabis Licensing Program* (Feb. 2, 2026).
[87] Conn. Gen. Stat. §§ 21a-420e, -420g (2026); Conn. Dep't of Consumer Prot., *What Is the Lottery Process for Applicants?* (Dec. 8, 2021).
[88] Conn. Dep't of Consumer Prot., supra note 85.
[89] Conn. Gen. Stat. § 21a-420o(a) (2026).

Connecticut also allowed existing medical marijuana producers to expand into the adult-use market.[90] This meant the state's existing producers could participate in adult-use cultivation while new cultivation opportunities were limited.

While DCP may conduct future licensing rounds, cultivator licenses are not currently available through a lottery nor are any other cannabis establishment lotteries are underway.

2. Market Effects

Connecticut's controlled licensing system limits how quickly new cultivation businesses can enter the market. At the same time, existing medical marijuana producers were allowed to expand into adult use, and the state created separate cultivation opportunities for qualifying social equity applicants. Therefore, Connecticut has used limited licensing from the start of its adult-use market, there is no clear period before and after a licensing freeze to compare.

3. Equity Effects

Equity was built directly into Connecticut's licensing system. For license types awarded through lotteries, at least half of the available licenses are reserved for social equity applicants.[91] Cultivation received additional treatment. Qualifying social equity applicants were given a one-time opportunity to apply for cultivator licenses in disproportionately impacted areas without going through a lottery.[92]

Connecticut later created additional flexibility for social equity applicants who had difficulty moving forward with those cultivator licenses. Beginning in 2024, certain applicants could withdraw their cultivator applications and instead apply for micro-cultivator licenses. The Legislature extended a similar option in 2025 to certain applicants and provisional cultivator licenses, with applications continuing into 2026.[93]

The state also temporarily relaxed the minimum facility requirement for certain social equity cultivators. Connecticut generally requires a cultivator to have at least 15,000 square feet of grow space, but legislation allowed certain provisional social equity cultivators to receive final licenses despite not yet reaching that threshold.[94]

Connecticut's limited licensing system did not close cultivation opportunities to equity applicants instead, the state created a separate pathway for social equity cultivators and later added options for applicants who had difficulty meeting the requirements of the original cultivator license.

4. Other Observed Effects

Connecticut's approach gives the state control over when and how many new licenses enter the market. DCP can announce additional lottery rounds rather than keeping applications continuously open. As of 2026, the agency has not announced another cultivator lottery.

The state has also adjusted its licensing framework as applicants moved through the process. The option for certain social equity cultivator applicants to convert to micro-cultivator licenses is one

[90] Conn. Gen. Stat. § 21a-420e(b) (2026).
[91] Conn. Dep't of Consumer Prot., *What Is the Lottery Process for Applicants?*, supra note 86
[92] Conn. Gen. Stat. § 21a-420o(a) (2026).
[93] Id. §§ 21a-420aa to -420bb.
[94] Id. § 21a-420n(b)(2).

example. Rather than opening cultivation broadly, the Legislature created another route for applicants already participating in the equity licensing process.[95]

In summation, Connecticut has controlled new cultivation licenses from the start rather than imposing a freeze after the market opened. Within that limited system, the state reserved cultivation opportunities for social equity applicants and later adjusted licensing requirements to help some of those applicants move forward.

III. Cross-Jurisdictional Findings

The six states outlined above vary in how and why they have restricted cannabis licenses, but several common themes emerge. States have used licensing restrictions to address agency capacity, oversupply, rapid market growth, and concerns about the number of licenses or locations in the market. The restrictions also vary in scope and duration. Some states adopted temporary moratoria, while others have maintained closed or controlled licensing systems.

One of the clearest findings across states is that restricting new licenses does not necessarily reduce existing production. Most restrictions allow current cultivators to continue operating and renewing their licenses. In some states, existing cultivators can also expand production. A freeze may therefore prevent new cultivation capacity from entering the market without reducing the capacity already in place. This was particularly clear in Oklahoma and Rhode Island, where production or oversupply remained high after new cultivation licenses were restricted.

Market effects are also difficult to tie directly to a licensing freeze. Prices, production, sales, and the number of active businesses can change for many reasons, including consumer demand, existing inventory, enforcement, operating costs, and competition. In several states, these changes were already underway when the licensing restriction began or occurred alongside other regulatory changes. The available information can show what happened during a moratorium but generally provides less certainty about its direct effects.

Equity-specific effects were particularly limited, and several jurisdictions either do not operate a comparable social equity licensing program or did not collect data that would allow staff to measure changes in equity participation before and after a licensing restriction. Where equity programs do exist, states have taken different approaches. Some apply the restriction to all new applicants, including equity applicants, while Washington and Connecticut have maintained limited pathways for equity applicants within otherwise restricted licensing systems. The available information is not enough to determine whether licensing freezes have had a measurable effect on equity ownership or participation.

Finally, restricting new licenses can change how businesses enter the market. Where new licenses are unavailable but existing licenses can be transferred, acquiring an existing license may become one of the only ways for a new operator to enter. Oregon provides the clearest example, where licenses that were previously available directly from the state for approximately $5,000 are now being purchased from existing license holders for substantially more. Montana similarly allows existing licensed premises to be

[95] Conn. Gen. Stat. §§ 21a-420aa to -420bb (2026).

transferred even though new locations are restricted. While there is not enough data to measure this effect across states, restricting new licenses may increase the importance and value of existing licenses and create an additional barrier for new entrants.

IV. Conclusion

The experiences of other states do not point to a single outcome from restricting new cultivation licenses. Differences in market conditions, regulatory structures, and the purpose and length of each restriction make direct comparisons difficult. While a freeze can limit new market entry, its broader effect depends on the cultivation capacity already in place, what existing licensees can do during the restriction, and other market conditions.

The available evidence is particularly limited on equity impacts and long-term market effects. As a result, the state-by-state analysis provides useful context for how other states have managed licensing restrictions but does not establish that a freeze, on its own, will produce a specific market or equity outcome

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Appendix A. Summary of Cannabis Licensing Restrictions in Selected Jurisdictions

Jurisdiction	Type/Period Of Restriction	Primary Purpose	Effect On Existing Cultivators	Market Effects	Equity Effects	Current Status
OREGON	Licensing restrictions beginning in 2018; evolved into population-based limits	Initially agency capacity; later oversupply, sustainability, and market size	Existing licensees could continue operating; production capacity was not frozen	Production continued to grow during initial pause; oversupply and market pressure continued	No equity carveout; secondary market increased cost of entry; no measurable equity-specific effect identified	Population-based licensing limits
OKLAHOMA	Moratorium beginning Aug. 2022; extended through Aug. 2028 unless ended earlier	Licensing, inspection, investigation, and enforcement capacity	Existing growers may renew and continue producing	Significant oversupply continued; license population declined amid moratorium and broader enforcement changes	No comparable social equity licensing program or equity exception	Moratorium remains in effect
MONTANA	Restrictions beginning with adult-use market; current "Freeze the Footprint" through June 2027	Initially controlled transition to adult use; later limit growth in licensed locations	Existing businesses may continue; cultivators could increase tiers; existing premises may be transferred	Adult-use market continued growing; insufficient data to isolate effect of current restriction	No comparable equity program; limited pathway for tribal participation	New licensed locations generally restricted

RHODE ISLAND	Cultivator moratorium beginning in 2022	Maintain controlled cultivation market and evaluate whether additional capacity is needed	Existing medical cultivators exempt and permitted to serve adult-use market	Existing capacity sufficient; unused cultivation space, growing inventories, and production exceeding sales growth	No cultivation exception for social equity applicants; equity licensing focused on retail	Moratorium remains in statute
WASHINGTON	Longstanding closed/controlled licensing system	Control entry into licensed market	Existing licenses remain active and may undergo approved changes	No clear before-and-after period to isolate market effects	Specific producer/processor pathway created for social equity applicants	General applications remain closed; limited equity pathway
CONNECTICUT	Limited application periods and lotteries rather than formal moratorium	Controlled market entry	Existing medical producers permitted to enter adult-use market	No clear before-and-after period to measure effect	Cultivation opportunities specifically provided to qualifying social equity applicants; later flexibility added	No cultivator lottery currently open

September 17 PM:

Advertising/Discounts/Loyalty Programs:

1. Whether to allow licensees the ability to permit advertising, marketing, and branding of sales, discounts and customer loyalty programs within an ME/MME or through an opt-in email list? [Chapter 65 § 21].
2. Whether to allow advertising "*within*" an ME and MME's by allowing this type of communications on ME's/MME's websites? [Chapter 65 § 21].

Delivery – Municipal Opt Out:

3. Whether municipal waivers occur after the initial two-year period required by the new law. [Chapter 65 § 25].

Authorizing Sale of Marijuana Seeds:

4. Whether to allow MEs or MMEs to sell marijuana seeds?
    a) Amendments to authorize the sale of Marijuana seeds based upon revised definition of "Marijuana" now excluding seeds, and the current regulatory language that would restrict an ME or MME from selling "any service or product other than Marijuana Products, Marijuana Accessories, and Branded Goods." [Chapter 65 § 6].

State-wide Industry License Caps:

5. Whether to limit the total number of licenses in both adult-use and medical-use programs overall? Or expressly promulgate regulations that state that the Commission may limit the total number of licenses in each license type and class. [Chapter 65 § 19].

Transporter Revision:

6. Whether to combine the two transporter licenses into one Marijuana Transporter License?. [Not Chapter 65 – Legal Recommendation].

Island Transportation:

7. Whether to incorporate Executive Order Number 3 into the regulations?
    a) The Commission was required to settle with Fine Fiddle under the terms including the current Executive Order Number 3, which the Commission is advised to permanently establish the in regulations. [Not Chapter 65 – Legal Recommendation].

RVT:

8. Whether to amend the annual training requirement? [Not Chapter 65 – Red Tape Removal].

Enforcement:

9. Red Tape Removal Committee policy consideration for amendment to 935 CMR 500.310 & 501.310: *Deficiency Statements,* to allow for discretion as to whether a notice of deficiency "may" be issued as opposed to "shall" be issued to align with other enforcement actions in regulation. [Not Chapter 65 – Red Tape Removal]

Medical Program:

10. Whether to establish a Medical Marijuana Dispensary License and FIMTC as recommended by the Medical WG. [Chapter 65 § 53].
    a) Whether to phase out FIMTCs entirely and other timing considerations.
    b) Whether to further amend colocated operations.
11. Whether to allow smoking for on-site consumption for the medical program. [Not Chapter 65 – Medical WG Proposal].
12. Whether the social exclusivity period applies only to new or also existing establishments. [Chapter 65 § 61].

Memorandum

To: Commissioners
From: Access to Medical Cannabis Working Group
Date: August 13, 2026
Subject: Draft Redline -- 935 CMR 501.000 (Medical Use of Marijuana) – Regulatory Implementation of Ch. 65 of the Acts of 2026: An Act Modernizing the Commonwealth's Cannabis Laws

I. Purpose

This memorandum presents a draft redline of 935 CMR 501.000, the Commission's regulations governing the Medical Use of Marijuana Program. The redline implements changes required by Ch. 65 of the Acts of 2026: An Act Modernizing the Commonwealth's Cannabis Laws, and reflects associated agency policy decisions.

Acronym Definitions:

MMD- Medical Marijuana Dispensary

MTC- Medical Treatment Center

MME – Medical Marijuana Establishment

FIMTC- Fully Integrated Medical Marijuana Treatment Centers

SOP- Standard Operating Procedure

Summary of Key Changes

- **New Medical Marijuana Dispensary (MMD) license type.** A new dispensary-only license allows entities to purchase, store, dispense, and deliver Medical-use Marijuana without cultivating or manufacturing. This new license type can be co-located with other licenses or a standalone business.
- **Vertical integration is no longer required.** Existing MTCs are redesignated as Fully Integrated Medical Marijuana Treatment Centers (FIMTC) and may elect which licensed activities to perform. A 36-month conversion pathway allows FIMTCs to convert to an MMD license.
- **Residency requirement eliminated.** Any person diagnosed with a Debilitating Medical Condition may register as a Qualifying Patient regardless of state residency.
- **Pediatric certification expanded.** Nurse Practitioners and Physician Assistants may certify pediatric patients with Life-limiting Illnesses, consistent with the existing framework for adult certifications. The specialty requirement is retained.
- **Institutional care access strengthened.** New ordering authority, on-site administration rules, and three-year renewal structures are established for Caregiving Institutions and Institutional Caregivers.
- **Certifying Healthcare Provider registry modernized.** Three-year renewal, automatic suspension upon professional license lapse, and an opt-in public provider list are added.

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- **Supply chain integration.** Targeted amendments to 935 CMR 500.000 authorize transfers from adult-use licensees to Medical Marijuana Establishments and allow Marijuana Product Manufacturers to produce and transfer above-cap products exclusively to the medical channel.
- **Overwater transport codified.** Administrative Order No. 3 (June 2024) governing transport to Dukes County and Nantucket is incorporated into 935 CMR 501.000 with full regulatory force.
- **Confidentiality.** Research related to medical patients is confidential and will not be disclosed via public records request. Certifying Healthcare Providers may opt in to a publicly available list on the Commission's website.
- **Conforming amendments.** All references to M.G.L. c. 10, § 76 are updated to M.G.L. c. 6, § 223, with global terminology updates throughout.

The Act requires regulatory action to remove vertical integration as a condition of licensure for Medical Marijuana Treatment Centers. Additional regulatory changes include the elimination of the Massachusetts residency requirement for Qualifying Patients, and amends the certification requirements for pediatric patients with Life-limiting Illnesses to allow two Certifying Healthcare Providers rather than specifically two physicians, provided at least one holds the required specialty (pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician). The redline creates a new Medical Marijuana Dispensary license type and a conversion pathway allowing existing Fully Integrated Medical Marijuana Treatment Center licensees to elect to convert to the MMD license type, both pursuant to the Commission's authority under M.G.L. c. 94I, § 7, and makes conforming and clarifying amendments throughout 935 CMR 501.000.

This redline also includes conforming amendments to 935 CMR 500.000 to authorize transfers from adult-use licensees to Medical Marijuana Establishments and to create a production and transfer carve-out for Marijuana Product Manufacturers supplying above-cap dosing products to the medical channel.

II. Redline Legend

~~Strikethrough red text~~ indicates deleted language.

Underlined blue text indicates new language.

Italic purple text following 'Drafter's Note:' explains the purpose and basis of each change.

III. Proposed Amendments to 935 CMR 501.000

501.001: Purpose

The purpose of 935 CMR 501.000 is to implement ~~St. 2017, c. 55: An Act to Ensure Safe Access to Marijuana; M.G.L. c. 94G and M.G.L. c. 94I.~~ M.G.L. c. 6, § 223, M.G.L. c. 94G, and M.G.L. c. 94I, and to carry out the authority granted to the Commission thereunder.

> *Drafter's Note: The session law citation (St. 2017, c. 55) is struck. Session laws that amend the MGL are properly cited by their MGL location, not by the session law. The purpose section is updated to reflect the Commission's current statutory homes: M.G.L. c. 6, § 223 (governance, added by Ch. 65), M.G.L. c. 94G, and M.G.L. c. 94I.*

501.002: Definitions

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[All definitions in the current 501.002 are retained without change unless specifically addressed below.]

Card Holder [AMENDED – Ch. 65 § 38]

~~Card Holder means a registered qualifying patient, personal caregiver, or agent of a medical marijuana treatment center who has been issued and possesses a valid registration card.~~

Card Holder means a Registered Qualifying Patient, Personal Caregiver, Institutional Caregiver, or agent of a medical marijuana establishment who has been issued and possesses a valid registration card.

> *Drafter's Note: Ch. 65 § 38 updates the statutory definition to replace 'agent of a medical marijuana treatment center' with 'agent of a medical marijuana establishment.' The Commission adds Institutional Caregiver as a regulatory matter, consistent with the IC registration framework established at 935 CMR 501.022 and the Commission's authority to administer registrations under M.G.L. c. 94I. The IC Registration Card issued under 501.022 is a registration card within the meaning of the statute; the definition is elaborated here to confirm ICs are card holders for purposes of the verification framework throughout 935 CMR 501.000.*

Caregiving Institution [AMENDED]

~~Caregiving Institution means a hospice program, long-term care facility, or hospital duly registered currently and validly by the Commission, providing care to a Registered Qualifying Patient on the premises of the facility or through a hospice program.~~

Caregiving Institution means a hospice program, long-term care facility, skilled nursing facility, hospital, licensed ambulatory care facility, home health agency, or other entity providing care to a Registered Qualifying Patient, that is duly registered currently and validly by the Commission and authorized by the Commission to provide care on the premises of the facility, at a patient's residence, or through such other care delivery arrangements as the Commission may approve.

> *Drafter's Note: Expanded to include SNFs, licensed ambulatory care facilities (including oncology infusion centers and community health centers), and home health agencies. 'At a patient's residence' added for home-based care. The 'other entity' catch-all requires Commission vote for initial registration per 935 CMR 501.038(3); enumerated facility types are ministerial.*

Cultivation Registration [AMENDED – Ch. 65 § 40]

~~Cultivation Registration means a registration issued to a medical marijuana treatment center to grow medical use marijuana under the terms of M.G.L. c. 94I, or to a qualified patient or personal caregiver.~~

Cultivation Registration means a registration issued to a medical marijuana establishment to grow medical use marijuana under the terms of M.G.L. c. 94I, or to a qualified patient or personal caregiver.

Executive Director [NEW]

Executive Director means the Executive Director of the Cannabis Control Commission, appointed pursuant to M.G.L. c. 6, § 223(i)(1).

> *Drafter's Note: Ch. 65 relocated the Commission to M.G.L. c. 6 and established the Executive Director by statute. Definition anchors the term throughout 935 CMR 501.000 where the ED is assigned specific ministerial and operational authorities.*

Fully Integrated Medical Marijuana Treatment Center [NEW – Ch.65 § 41]

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Fully Integrated Medical Marijuana Treatment Center means an entity licensed under 935 CMR 501.000 to elect and perform any combination of the following licensed activities: cultivating Marijuana; manufacturing and processing Marijuana Products; and dispensing and delivering Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. A Fully Integrated Medical Marijuana Treatment Center may purchase or obtain Marijuana and Marijuana Products from other Medical Marijuana Establishments and from Marijuana Establishments licensed under 935 CMR 500.000. A Fully Integrated Medical Marijuana Treatment Center may Transfer Medical-use Marijuana to other Medical Marijuana Establishments. A Fully Integrated Medical Marijuana Treatment Center is not required to simultaneously perform all licensed activities as a condition of licensure. A Fully Integrated Medical Marijuana Treatment Center may also be referred to as a 'Medical Marijuana Treatment Center' or 'MTC.'

> *Drafter's Note: Ch. 65 § 51 removes vertical integration as a condition of licensure. Definition style mirrors 935 CMR 500.002 license type definitions.*

Marijuana [AMENDED – Ch. 65 §§ 12, 43]

~~Marijuana (or Cannabis) means all parts of any plant of the genus Cannabis, whether growing or not; the seeds thereof; and resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1.~~

Marijuana (or Cannabis) means all parts of any plant of the genus Cannabis, not excepted below and whether growing or not; and resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant or its resin including tetrahydrocannabinol as defined in section 1 of chapter 94C; provided, however, that marijuana shall not include: (i) the mature stalks of the plant, fiber produced from the stalks, oil or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil or cake made from the seeds of the plant; (ii) the seeds of the plant; (iii) hemp; or (iv) the weight of any other ingredient combined with marijuana to prepare topical or oral administrations, food, drink or other products.

> *Drafter's Note: Ch. 65 §§ 12 and 43 revise the Marijuana definition in M.G.L. c. 94G, § 1 and make M.G.L. c. 94I, § 1 cross-reference to it. The substantive change is the removal of seeds from the definition -- seeds of the plant are now expressly excluded. The prior regulatory definition included seeds. The revised statutory definition is adopted verbatim to ensure consistency with the governing statute and to avoid any divergence as the statute is amended over time.*

Marijuana-infused Product (MIP) [DELETED]

~~Marijuana-infused Product (MIP) means a Marijuana Product infused with Marijuana that is intended for use or consumption including, but not limited to, Edibles, ointments, aerosols, oils, and Tinctures. [Full definition deleted.]~~

> *Drafter's Note: MIPs are already a subset of Marijuana Products. All MIP references replaced with 'Marijuana Products' as a global conforming amendment.*

Medical Marijuana Dispensary (MMD) [NEW]

Medical Marijuana Dispensary (MMD) means an entity licensed under 935 CMR 501.000 to purchase or obtain Finished Marijuana Products and Medical-use Marijuana from licensed Medical Marijuana Establishments and Marijuana Establishments licensed under 935 CMR 500.000; to Repackage, store, sell, dispense, and administer Medical-use Marijuana and Finished Marijuana Products to Registered

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Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions; and to deliver Medical-use Marijuana and Finished Marijuana Products to Registered Qualifying Patients, Personal Caregivers, and registered Caregiving Institutions. A Medical Marijuana Dispensary is not authorized to cultivate Marijuana or to Manufacture Marijuana Products.

> *Drafter's Note: The Medical Marijuana Dispensary is a Commission-created license type authorized by the Commission's rulemaking authority under M.G.L. c. 94I, § 7, as amended by Ch.65. Ch.65 creates the Fully Integrated MTC by statute and grants the Commission authority to license other types of medical marijuana-related businesses; the MMD is created pursuant to that authority. Definition style mirrors 935 CMR 500.002 license type definitions.*

Medical Marijuana Establishment [AMENDED – Ch. 65 § 43]

~~Medical Marijuana Treatment Center (MTC), formerly known as a Registered Marijuana Dispensary (RMD), means [full prior definition deleted].~~

Medical Marijuana Establishment means a Fully Integrated Medical Marijuana Treatment Center or a Medical Marijuana Dispensary, or any other type of licensed medical use of marijuana-related business authorized by the Commission pursuant to M.G.L. c. 94I, § 7.

> *Drafter's Note: The umbrella term captures the FIMTC (created by Ch. 65 § 41), the MMD (created by Commission rulemaking under M.G.L. c. 94I, § 7), and any future license types the Commission may authorize. Applied throughout 935 CMR 501.000 wherever a provision applies equally to all MME license types.*

Medical Marijuana Establishment Agent (MME Agent) [AMENDED -- replaces MTC Agent]

~~MTC Agent means any Owner, employee, Executive, or volunteer of an MTC, who shall be 21 years of age or older. [Full prior definition deleted.]~~

Medical Marijuana Establishment Agent (MME Agent) means any Owner, employee, Executive, or volunteer of a Medical Marijuana Establishment who shall be 21 years of age or older. Employee includes a consultant or contractor who provides on-site services to a Medical Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of Marijuana or Marijuana Products for medical purposes.

> *Drafter's Note: Replaces 'MTC Agent' throughout 935 CMR 501.000. Umbrella term captures agents of any current or future MME license type.*

Medical Marijuana Treatment Center (MTC) [AMENDED -- simplified]

~~Medical Marijuana Treatment Center (MTC) [full prior definition deleted]~~

Medical Marijuana Treatment Center (MTC) means a Fully Integrated Medical Marijuana Treatment Center as defined in 935 CMR 501.002.

Medical-use Marijuana [AMENDED -- consolidated definition]

~~Medical-use Marijuana (or Medical-use Cannabis) means Marijuana that is cultivated, Processed, Transferred, tested or sold in compliance with M.G.L. c. 94I, and 935 CMR 501.000.~~

~~Medical-use Marijuana means Marijuana Products that are Manufactured, Transferred, tested or sold in compliance with M.G.L. c. 94I, and 935 CMR 501.000.~~

Medical-use Marijuana (or Medical-use Cannabis) means Marijuana or Marijuana Products that are cultivated, manufactured, processed, transferred, tested, sold, or dispensed in compliance with M.G.L. c.

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94I and 935 CMR 501.000, including Marijuana or Marijuana Products possessed by a Registered Qualifying Patient under a Cultivation Registration.

> *Drafter's Note: Consolidates the prior two definitions -- 'Medical-use Marijuana' and 'Medical-use Marijuana or Marijuana Products' -- into one term. Ch. 65 § 43 defines Medical Use Marijuana in M.G.L. c. 94I, § 1 as 'marijuana or marijuana accessories sold by a medical marijuana establishment to a card holder for medical use, or marijuana or marijuana accessories possessed by a qualifying patient under a cultivation registration.' The regulatory definition elaborates on the statutory minimum to address operational matters the statute does not resolve: it is compliance-based rather than recipient-based, it incorporates Marijuana Products expressly, and it states the dosing limitation carve-out that governs the medical channel. The regulatory definition is consistent with and does not conflict with the statutory definition.*

Qualifying Patient [AMENDED -- simplified]

~~Qualifying Patient means: (a) a Massachusetts Resident or a non-Massachusetts Resident receiving end-of-life or palliative care or cancer treatment in Massachusetts... [full prior definition deleted].~~

Qualifying Patient means a person who has been diagnosed by a Certifying Healthcare Provider as having a Debilitating Medical Condition.

> *Drafter's Note: The Massachusetts residency requirement was a Commission-imposed regulatory restriction, not a statutory requirement -- M.G.L. c. 94I has never required residency. The Commission is exercising its rulemaking authority under M.G.L. c. 94I, § 7 to remove the restriction. The prior end-of-life carve-out for non-residents is also struck -- it was a narrow exception to residency and is moot without the underlying restriction. Age-specific certification requirements remain in 935 CMR 501.010.*

Registered Qualifying Patient [AMENDED -- simplified]

~~Registered Qualifying Patient or Patient means a Qualifying Patient who is currently and validly issued a temporary or an annual Registration Card by the Commission.~~

Registered Qualifying Patient or Patient means a Qualifying Patient who holds a current and valid Registration Card issued by the Commission pursuant to 935 CMR 501.015.

Registration Card [AMENDED]

Registration Card means a physical or electronic identification card, in a form determined by the Commission, currently and validly issued by the Commission to a Registered Qualifying Patient, Personal Caregiver, Institutional Caregiver, Medical Marijuana Establishment Agent, or Laboratory Agent. [Remainder of definition unchanged.]

> *Drafter's Note: Authorizes physical or electronic Registration Cards consistent with the Commission's modernization of patient-facing systems. 'MTC Agent' updated to 'MME Agent' as a global conforming amendment.*

Seaworthy Vessel [NEW]

Seaworthy Vessel means a vessel that: (a) is fit in all aspects to complete the intended voyage; (b) is served by a properly trained crew with access to sufficient equipment and supplies; (c) is fit and safe for the reception, carriage, and preservation of Marijuana or Marijuana Products; (d) has passed Commission inspection as required under 935 CMR 501.200; and (e) is compliant with all applicable laws, regulations, and Commission orders.

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State Territorial Waters [NEW]

State Territorial Waters means the navigable waters within the boundaries of the Commonwealth of Massachusetts as set forth in the Massachusetts Coastal Zone Map, published by the Massachusetts Office of Coastal Zone Management.

Temporary Registration [AMENDED – Ch. 65 § 45]

~~Temporary Registration means an interim registration document for patients and their personal caregivers, issued by the Commission pending issuance of a Registration Card.~~

Temporary Registration means an interim registration document for Registered Qualifying Patients and their Personal Caregivers generated automatically upon the Commission's receipt of a healthcare professional's electronic certification. The temporary registration document shall constitute a Registration Card for patients and their personal caregivers to access a Medical Marijuana Establishment. Temporary Registration shall expire 14 days after the Commission issues the Registration Card.

Social Equity Business [NEW – Ch. 65 § 61]

Social Equity Business means a Medical Marijuana Establishment with not less than 51 per cent majority ownership by individuals who are eligible for the Social Equity Program under M.G.L. c. 94G, § 22, or whose ownership qualifies it as an Economic Empowerment Priority Applicant as defined by the commission's regulations promulgated pursuant to M.G.L. c. 94G, § 4.

School Entrance [AMENDED]

~~School Entrance means the entrance(s) that provide ingress and egress to students of the pre-existing public or private school providing education in kindergarten or any grades 1 through 12 at the time of the newspaper publication of the proposed MTC's community outreach meeting under 935 CMR 501.101(1)(a)9.a.~~

School Entrance means the entrance(s) that provide ingress and egress to students of the pre-existing public or private school providing education in kindergarten or any grades 1 through 12 at the time of application submission under 935 CMR 501.100.

> *Drafter's Note: The prior definition anchored the School Entrance determination to the community outreach meeting publication date, which is struck by this redline. The time reference is updated to the date of application submission, which is the equivalent fixed point in the application process and is the moment at which the applicant commits to a proposed location and the Commission begins its review.*

Global Conforming Amendments throughout 935 CMR 501.000

~~Marijuana-infused Products (MIPs)~~ -> Marijuana Products

~~MTC Agent~~ -> Medical Marijuana Establishment Agent or MME Agent

~~medical marijuana treatment center (umbrella use)~~ -> Medical Marijuana Establishment

~~medical marijuana treatment center (vertically integrated entity)~~ -> Fully Integrated Medical Marijuana Treatment Center

~~license class / license classes~~ -> license type / license types

~~Fully Integrated MTCs and Medical Marijuana Dispensaries (where umbrella intent)~~ -> Medical Marijuana Establishments

~~M.G.L. c. 10, § 76~~ -> M.G.L. c. 6, § 223

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Gendered pronouns (he or she, his or her) updated to gender-neutral language throughout all retained provisions.

935 CMR 501.160 (Testing) is retained without substantive change. All MTC and Medical Marijuana Treatment Center references are updated to Medical Marijuana Establishment by global conforming amendment. The testing protocol nomenclature reference in 501.160(1) shall be updated to reflect current Commission protocol naming upon promulgation. Testing obligations in 501.160 apply to all Medical Marijuana Establishments; ITL licensing and Laboratory Agent registration are governed by 935 CMR 500.000 consistent with 935 CMR 501.029.

501.003: Colocated Marijuana Operations (CMOs) [AMENDED]

~~Colocated Marijuana Operations (CMO) means an MTC operating under a License pursuant to 935 CMR 501.000 and a Marijuana Establishment operating under at least one License pursuant to 935 CMR 500.000 on the same Premises. [Remainder deleted.]~~

Colocated Marijuana Operations (CMO) means a Medical Marijuana Establishment operating under a license pursuant to 935 CMR 501.000 and a Marijuana Establishment operating under at least one license pursuant to 935 CMR 500.000, on the same Premises. A Medical Marijuana Establishment may hold adult-use Marijuana Establishment licenses under 935 CMR 500.000 consistent with applicable license caps. Nothing in this section limits the ability of a Medical Marijuana Establishment to elect which adult-use licensed activities it holds in conjunction with its medical use license.

501.005: Fees [AMENDED]

501.005(1): Fully Integrated Medical Marijuana Treatment Center -- Fees

[Existing MTC fee schedule retained without change.]

501.005(2): Medical Marijuana Dispensary -- License Fees [NEW]

(a) Application Fee: $1,500 (non-refundable)

(b) Annual License Fee: $10,000

(c) Change of Location Fee: $5,000

(d) Change in Name Fee: $1,000

(e) Change in Building Structure Fee: $1,000

(f) Change in Ownership or Control Fee (entity): $5,000 per entity, per license

(g) Change in Ownership or Control Fee (individual): $500 per person

(h) Architectural Review Request Fee: $1,500

(i) Packaging and Labeling Preapproval Application Fee: $50 per product

501.005(3): Medical Marijuana Dispensary -- Equity Fee Waivers and Reductions [NEW]

(a) Application Fee Waivers. The $1,500 application fee is waived for: (1) businesses controlled by and with majority ownership comprised of Social Equity Program Participants or Economic Empowerment Priority Applicants; (2) Massachusetts MBE, WBE, or VBE businesses with valid SDO certification that are also Small Businesses as defined by the Commission; or (3) any other diverse business enterprise with a valid certification from the Supplier Diversity Office. This waiver does not include background check costs.

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(b) Annual License Fee Reduction. A 50% reduction in the annual license fee applies to: (1) Social Equity Program Participants or Economic Empowerment Priority Applicants; (2) qualifying MBE, WBE, or VBE businesses with valid SDO certification; or (3) any other diverse business enterprise with a valid certification from the Supplier Diversity Office.

501.005(4): Medical Marijuana Establishment Agent Registration Card -- Fees [AMENDED]

(a) An applicant for a Registration Card as a Medical Marijuana Establishment Agent or any other position designated as an agent by the Commission shall pay a nonrefundable application fee of $115.

(b) An applicant for a renewal of a Registration Card shall pay a renewal fee of $115.

> *Drafter's Note: Laboratory Agent reference removed. Laboratory Agents are registered under 935 CMR 500.000, not 935 CMR 501.000.*

501.005(5): Caregiving Institution and Institutional Caregiver Registration Fees [NEW]

(a) Caregiving Institution Initial Registration Fee: $500 (non-refundable)

(b) Caregiving Institution Three-Year Renewal Fee: $300

(c) Institutional Caregiver Initial Registration Fee: $50 per individual (non-refundable)

(d) Institutional Caregiver Three-Year Renewal Fee: $35 per individual

(e) Change of Location Fee: $100

501.005(6): Certifying Healthcare Provider Registration -- No Fee [NEW]

No registration fee shall be charged to Certifying Healthcare Providers for initial registration or three-year renewal under 935 CMR 501.009.

> *Drafter's Note: Registration and renewal are required to maintain an accurate statutory registry under M.G.L. c. 94I. The absence of a fee reflects the public health nature of provider registration and is intended to remove barriers to participation for certifying providers.*

501.005(7): Physical Registration Card Fee [NEW]

(a) The Commission shall issue Registered Qualifying Patient and Personal Caregiver Registration Cards in electronic form by default at no additional charge.

(b) A Registered Qualifying Patient or Personal Caregiver who requests a physical Registration Card shall pay a fee of $10 at the time of the request.

(c) The fee for replacement of any Registration Card, whether physical or electronic, is $10.

> *Drafter's Note: The Commission has authority to determine the form and manner of Registration Cards under 935 CMR 501.002. M.G.L. c. 94I does not require the Commission to issue physical cards. Establishing electronic issuance as the default reduces both the cost of administering the registration program and the environmental impact of producing and distributing physical cards at scale.*

501.009: Three-Year Renewal of Certifying Healthcare Provider Registration [NEW]

> *Drafter's Note: New section placed at 501.009 to keep registration-related provisions together. The three-year renewal cycle is the Commission's mechanism for fulfilling its statutory obligation under M.G.L. c. 94I to maintain an accurate registry of Certifying Healthcare Providers. The renewal requirement is an administrative registry maintenance process -- it verifies that registered providers continue to hold valid Massachusetts professional licenses -- and does not restrict who may certify or what conditions may be certified.*

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(1) A Certifying Healthcare Provider registration is valid for three years from initial issuance or most recent renewal. A renewal application must be submitted not later than 90 days prior to expiration.

(2) To renew, a Certifying Healthcare Provider shall: (a) submit a renewal application in a form and manner determined by the Commission; (b) attest that their Massachusetts professional license is current and in good standing; (c) attest continued practice consistent with the requirements of a Bona Fide Healthcare Provider-Patient Relationship; and (d) provide any updated contact or practice information required by the Commission.

(3) A provider whose registration has lapsed may not issue Written Certifications until renewed or reinstated. A provider whose registration has lapsed for more than 12 months must apply as a new registrant.

(4) The Commission may deny renewal if the provider: (a) no longer holds a valid Massachusetts professional license; (b) has been subject to a final disciplinary action related to inappropriate or fraudulent certification practices; or (c) has otherwise failed to comply with applicable registration requirements. A recommendation to deny shall be referred to the full Commission for action.

(5) The Commission shall provide written notice of the renewal deadline not less than 120 days prior to expiration.

501.010: Written Certification [AMENDED at subsection (10)]

[Subsections (1) through (9) of 501.010 are retained without change.]

(10) A Written Certification for a Qualifying Patient younger than 18 years of age may be issued only if the Qualifying Patient has been diagnosed as having a Debilitating Medical Condition that is also a Life-limiting Illness and has been certified by ~~two Massachusetts licensed Certifying Physicians, at least one of whom is a board-certified pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician,~~ two Certifying Healthcare Providers, at least one of whom shall be a board-certified pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician, as having such a Debilitating Medical Condition.

> *Drafter's Note: 'Massachusetts licensed' removed -- redundant with the CHP definition which already requires Massachusetts licensure. 'Certifying Physicians' broadened to 'Certifying Healthcare Providers' to allow NPs and PAs to certify pediatric patients with Life-limiting Illnesses, consistent with the Commission's existing framework under which NPs and PAs are already authorized to certify adult patients. The extension to pediatric patients with the required specialty removes an inconsistency in the certifying provider framework. Specialty requirement retained.*

501.015: Temporary and Annual Registration of Qualifying Patients [NOTE]

[Any provision within 501.015 that limits registration to Massachusetts residents, or that establishes a separate registration pathway for non-Massachusetts residents receiving end-of-life or palliative care or cancer treatment in Massachusetts, is struck. The open enrollment policy established by the amended Qualifying Patient definition governs eligibility for all persons.]

501.021: Registration of Caregiving Institutions [AMENDED]

[Existing 501.021 is retained with conforming amendments. All references to specific facility types within 501.021 are replaced with a cross-reference to the definition of Caregiving Institution at 935 CMR 501.002. The definition governs eligibility; repeating the enumeration in 501.021 is unnecessary and creates a risk of inconsistency if the definition is later amended. New subsections are numbered (7)

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through (11) based on the existing subsection structure of 501.021. The following targeted amendments are also made:]

501.021(2) [AMENDED -- destruction obligation struck]

~~On the issuance of a new certificate, the holder of the certificate shall destroy any previously issued certificate in a responsible manner that would prevent it from being used as a certificate.~~

> *Drafter's Note: The destruction obligation is a physical-card-era requirement. The CI registration is database-driven; the Commission's confidential database is the authoritative record of registration status. Whether a physical certificate exists is immaterial to verification.*

501.021(6) [AMENDED -- termination language]

~~(6) A Certificate of Registration for a Caregiving Institution will remain valid, unless and until the Caregiving Institution's current facility licensure or certification from the Commonwealth of Massachusetts is no longer active, or is suspended, revoked, or restricted.~~

(6) A Caregiving Institution registration terminates when the Caregiving Institution's current facility licensure or certification from the Commonwealth of Massachusetts is no longer active, or is suspended, revoked, or restricted.

> *Drafter's Note: Updated to use "terminates" consistent with the registration termination framework at 935 CMR 501.033. The triggering events are unchanged.*

501.021(7): Ordering Authority [NEW]

(7) A registered Caregiving Institution, acting through a registered Institutional Caregiver, may place orders for Medical-use Marijuana with a licensed Medical Marijuana Establishment on behalf of its Registered Qualifying Patients. Each order shall identify the Registered Qualifying Patients for whom product is being ordered and the quantities attributable to each patient, consistent with applicable patient purchase limits.

> *Drafter's Note: Express ordering authority establishes the patient-level accounting required when a CI receives product for multiple patients simultaneously.*

501.021(8): On-Site Consumption Authorization [NEW]

(8) A Caregiving Institution may permit Institutional Caregivers to administer Medical-use Marijuana to Registered Qualifying Patients on the premises of the Caregiving Institution, provided that: (a) administration is performed by a registered Institutional Caregiver; (b) the patient holds a current and valid Registration Card and a Written Certification; (c) administration is consistent with the patient's care plan and the Caregiving Institution's policies; (d) non-combustion, non-vaporizing forms of Medical-use Marijuana may be administered without additional Commission approval; and (e) smoking or vaporizing shall only be permitted where the Caregiving Institution has received prior Commission approval and has demonstrated air filtration and ventilation systems consistent with the standards applicable to Social Consumption Establishments under 935 CMR 500.141, employee safety practices consistent with those standards, and designation of specific areas separated from areas used by residents, patients, staff, or visitors who have not consented to exposure.

> *Drafter's Note: On-site consumption is a necessary predicate for residential facilities -- nursing homes, SNFs, hospice programs, LTC facilities -- where patients cannot take product home. Non-combustion is automatic; combustion requires prior Commission approval and social consumption ventilation standards under 935 CMR 500.141, balancing patient access against health and safety of other residents and staff.*

501.021(9): Administration Records [NEW]

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(9) The Institutional Caregiver administering Medical-use Marijuana shall log each administration in the patient's record maintained by the Caregiving Institution, including: the product administered; the quantity; the method of administration; the date and time; and the name and registration number of the administering Institutional Caregiver. Administration records shall be maintained as required by 935 CMR 501.000 and applicable state law.

501.021(10)-(11): Three-Year Renewal [NEW]

(10) A Caregiving Institution registration is valid for three years from initial issuance or most recent renewal. To renew, a Caregiving Institution shall: (a) submit a renewal application not later than 90 days prior to expiration; (b) attest continued eligibility and authorization; (c) provide an updated list of all currently registered Institutional Caregivers; (d) attest that all participating Institutional Caregivers hold current registrations; and (e) pay the applicable renewal fee under 935 CMR 501.005(5)(b).

(11) The Commission may deny renewal if the Caregiving Institution no longer meets eligibility requirements, has been subject to a final enforcement action materially affecting its ability to provide care, or has otherwise failed to comply with 935 CMR 501.000. A recommendation to deny shall be referred to the full Commission for action.

501.022: Registration of Institutional Caregivers [AMENDED -- new subsections added]

[Existing 501.022 retained with the following targeted amendments. New subsections are numbered (9) through (11) based on the existing subsection structure of 501.022.]

501.022(3) [AMENDED -- void replaced with terminates; promptly]

~~(3) A Caregiving Institution shall notify the Commission no more than one business day after an Institutional Caregiver ceases to be associated with the Caregiving Institution. The Institutional Caregiver's registration shall be immediately void when he or she is no longer associated with the Caregiving Institution.~~

(3) A Caregiving Institution shall promptly notify the Commission after an Institutional Caregiver ceases to be associated with the Caregiving Institution. The Institutional Caregiver's registration terminates when the Institutional Caregiver is no longer associated with the Caregiving Institution, consistent with 935 CMR 501.033(3).

> *Drafter's Note: "Immediately void" replaced with "terminates" consistent with 935 CMR 501.033(3). "No more than one business day" replaced with "promptly" consistent with the operational standard used throughout this redline.*

501.022(4) [DELETED -- superseded by 501.022(10)]

~~[Existing 501.022(4) full text deleted.]~~

> *Drafter's Note: 501.022(4) is deleted. It governed the one-year validity period and annual renewal of IC Registration Cards, and required destruction of superseded cards. All three elements are superseded: renewal is now governed by the three-year renewal framework at 501.022(10); the destruction obligation is inconsistent with the digital registration environment; and the card-centric framing is replaced by the registration-centered framework at 935 CMR 501.033.*

501.022(7) [AMENDED -- available for inspection]

~~(7) An Institutional Caregiver shall carry his or her Registration Card at all times while in possession of Marijuana.~~

(7) An Institutional Caregiver shall have their registration available for inspection at all times while in possession of Marijuana.

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> *Drafter's Note: "Carry his or her Registration Card" replaced with "have their registration available for inspection" -- technology-neutral framing appropriate for a digital registration environment.*

501.022(9): In-Person Purchasing Authority [NEW]

(9) A registered Institutional Caregiver may present at a licensed Medical Marijuana Establishment and purchase Medical-use Marijuana on behalf of identified Registered Qualifying Patients of their registered Caregiving Institution. The following verification requirements apply: (a) the Institutional Caregiver shall present their current and valid Institutional Caregiver Registration Card -- no government-issued photo identification is required; (b) the Medical Marijuana Establishment shall confirm through the Commission's confidential database that the Institutional Caregiver's registration and the Caregiving Institution's registration are both current and valid; (c) the Institutional Caregiver shall identify the Registered Qualifying Patients on whose behalf the purchase is being made; (d) the Medical Marijuana Establishment shall confirm each identified patient's registration is current and valid; (e) purchase quantities shall be attributed to each identified patient and shall not exceed applicable patient purchase limits; and (f) the Medical Marijuana Establishment shall record the transaction in the Commission's seed-to-sale tracking system, attributing product to each identified patient.

> *Drafter's Note: The IC Registration Card is Commission-issued and database-verifiable, serving the same identification function as the Registration Card plus government-issued photo ID combination required for Personal Caregivers. Requiring personal government-issued ID from healthcare professionals acting in their employment capacity creates an unnecessary privacy burden with no additional regulatory benefit. Intentional distinction.*

501.022(10)-(11): Three-Year Renewal [NEW]

(10) An Institutional Caregiver registration is valid for three years from initial issuance or most recent renewal. To renew: (a) submit a renewal application not later than 90 days prior to expiration; (b) attest continued employment under a currently registered Caregiving Institution; (c) attest continued compliance with 935 CMR 501.022 and 501.025; and (d) pay the applicable renewal fee.

(11) An Institutional Caregiver whose registration has lapsed may not participate as an Institutional Caregiver in the medical use of marijuana program until renewed or reinstated.

501.025: Responsibilities of Caregivers [AMENDED -- Institutional Caregiver subsection]

[501.025(1) Personal Caregivers is retained without change. 501.025(2)(b) through (c) Institutional Caregiver prohibitions and notification requirements are retained without change. 501.025(2)(a) is amended as follows:]

~~(2)(a) An Institutional Caregiver may: 1. Receive Marijuana delivered to the Caregiving Institution for a Registered Qualifying Patient; 2. Prepare Marijuana for consumption by a Registered Qualifying Patient; and 3. Administer Marijuana to a Registered Qualifying Patient or facilitate consumption of Marijuana for medical use by the Qualifying Patient.~~

(2)(a) An Institutional Caregiver may: 1. Purchase Medical-use Marijuana in person at a licensed Medical Marijuana Establishment on behalf of identified Registered Qualifying Patients of their registered Caregiving Institution; 2. Place orders for Medical-use Marijuana with a licensed Medical Marijuana Establishment on behalf of Registered Qualifying Patients of their registered Caregiving Institution; 3. Receive Medical-use Marijuana delivered to the Caregiving Institution on behalf of Registered Qualifying Patients; 4. Prepare Medical-use Marijuana for consumption by a Registered Qualifying Patient; and 5. Administer Medical-use Marijuana to a Registered Qualifying Patient or facilitate consumption of Medical-use Marijuana by the Qualifying Patient.

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> *Drafter's Note: 501.025(2)(a) is the affirmative authority provision for Institutional Caregivers. The prior text authorized only receiving delivery, preparing, and administering — it said nothing about in-person purchasing or ordering, which are established by the new frameworks at 501.022(9) and 501.021(7) respectively. Without a corresponding amendment here, those sections create procedural mechanics for activities not affirmatively authorized at the caregiver level. The revised subsection enumerates all five authorized IC activities. Prohibitions and notification requirements at 501.025(2)(b) and (c) are unchanged.*

501.029: Independent Testing Laboratory Agents [AMENDED -- streamlined]

~~[Existing 501.029 full text deleted]~~

Independent Testing Laboratories and their agents that test Medical-use Marijuana under 935 CMR 501.000 shall be licensed and registered pursuant to 935 CMR 500.000. Nothing in 935 CMR 501.000 shall be construed to require separate licensure or registration of Independent Testing Laboratories or Laboratory Agents under this section.

> *Drafter's Note: ITLs have been licensed under 935 CMR 500 since the program transferred from DPH. A separate registration provision in 935 CMR 501 is redundant.*

501.030: Registration of Medical Marijuana Establishment Agents [AMENDED]

~~Registration of Medical Marijuana Treatment Center Agents~~ -- section heading amended. All references to 'MTC Agent' amended to 'Medical Marijuana Establishment Agent' or 'MME Agent.' Existing requirements apply to all MME Agents of any Medical Marijuana Establishment.

(10) The issuance and renewal of Medical Marijuana Establishment Agent Registration Cards may be delegated to the Executive Director or their designee. The Executive Director or their designee shall issue or renew an MME Agent Registration Card where the applicant has submitted a complete application, satisfied all applicable suitability and background check requirements under 935 CMR 501.802, paid all applicable fees under 935 CMR 501.005(4), and is employed by or associated with a currently licensed Medical Marijuana Establishment. Medical Marijuana Establishment Agents shall remain suitable at all times in accordance with 935 CMR 501.802.

> *Drafter's Note: Agent registration is ministerial -- verification of background and eligibility. The carve-out for suitability concerns preserves Commission oversight where it is warranted.*

501.040: Leadership Rating Program for Medical Marijuana Treatment Centers [DELETED]

~~[Existing 501.040 full text deleted.]~~

> *Drafter's Note: The Leadership Rating Program was never implemented. The new Medical Marijuana Establishment license structure — which separates the Fully Integrated MTC from the Medical Marijuana Dispensary — would require substantial rework to extend the program meaningfully across license types. Deletion removes a dormant provision and eliminates the enforcement hook at 501.040(3)(f), which authorized ratings to be considered in assessing fines and disciplinary action under a program that has not operated.*

501.052: Independent Testing Laboratories [AMENDED -- streamlined]

~~[Existing 501.052 full text deleted.]~~

Independent Testing Laboratories that test Medical-use Marijuana under 935 CMR 501.000 shall be licensed pursuant to 935 CMR 500.000. Nothing in 935 CMR 501.000 shall be construed to require separate licensure of Independent Testing Laboratories under this section.

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Drafter's Note: ITLs have been licensed exclusively under 935 CMR 500.000 since the program transferred from DPH. The existing 501.052 provisions governing ITL independence and conflict-of-interest requirements are subsumed by the 500.000 licensing framework. Parallel treatment with 935 CMR 501.029 (Laboratory Agents).

501.032: Revocation of Registration [AMENDED -- conforming]

[Existing 501.032 is retained without substantive change. All references to "Registration Card" are amended to read "registration" throughout, consistent with the registration-centered framework established at 935 CMR 501.033. Section heading updated accordingly. Note: the logical reading order of the registration adverse action framework is denial (501.031), termination (501.033), suspension (501.036), revocation (501.032); section numbering reflects historical sequence and does not alter the substantive framework.]

501.033: Termination of Registration [AMENDED]

~~[Existing 501.033 full text deleted.]~~

(1) A registration issued under 935 CMR 501.000 terminates automatically upon the occurrence of a terminating event set forth in 935 CMR 501.033(2) through (5). A terminated registration is inactive and invalid. The Commission shall promptly update the registration status in the confidential database following the terminating event.

(2) Medical Marijuana Establishment Agent Registrations. An MME Agent registration terminates when: (a) the agent has ceased to be associated with the Medical Marijuana Establishment under whose license the agent is registered.

(3) Institutional Caregiver Registrations. An Institutional Caregiver registration terminates when: (a) the Institutional Caregiver's employment at their registered Caregiving Institution ends.

(4) Qualifying Patient Registrations. A Qualifying Patient registration, including a Hardship Cultivation Registration, terminates when the Qualifying Patient is deceased.

(5) Personal Caregiver Registrations. A Personal Caregiver registration terminates when: (a) the Personal Caregiver has no remaining active patient designations. For the purposes of this subsection, a Personal Caregiver has no remaining active patient designations when all Registered Qualifying Patients for whom the Personal Caregiver is registered have died, are no longer registered with the Commission, or have each individually revoked the Personal Caregiver's designation.

(6) Pre-Program Transfer. A registration validly issued prior to the Program Transfer terminates upon issuance of a new registration under 935 CMR 501.000.

Drafter's Note: Section title and text updated throughout to speak to registrations rather than Registration Cards. The registration is the legal instrument; the Registration Card, whether physical or digital, is evidence of registration status. The Commission's confidential database is the authoritative record of registration status and the operative mechanism by which termination takes effect. New card supersession language is removed -- renewal of a registration is a continuation, not a terminating event. The prior "void" concept is replaced with "terminates" throughout; a terminated registration reflects one that was lawfully issued and has ended, not one that was invalid from inception. Subsection (5) corrects an inconsistency in the prior text under which termination could be triggered by a single patient's revocation of designation even where the caregiver continued to serve other patients; a Personal Caregiver registration terminates only when no active patient designations remain. The residency trigger previously applicable to patient registrations is struck as the residency requirement for Qualifying Patients has been eliminated by this redline.

501.036: Suspension of Registration [NEW]

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(1) Authority. The Executive Director or their designee may suspend a registration issued under 935 CMR 501.000 pending investigation or Commission action where there is credible information supporting a reasonable belief that the registrant has engaged in conduct that would constitute grounds for revocation under 935 CMR 501.032 or that otherwise poses a risk to public health, safety, or welfare. The Commission shall promptly update the registration status in the confidential database following the suspension.

(2) Triggering Circumstances. Suspension may be appropriate where there is credible information of: (a) diversion of Medical-use Marijuana to unauthorized persons; (b) fraudulent use or misrepresentation in connection with a registration; (c) an active criminal investigation involving the registrant that relates to conduct governed by 935 CMR 501.000; (d) for MME Agent and Institutional Caregiver registrations: summary suspension of the associated MME license or Caregiving Institution registration, unless otherwise authorized by the Commission; or (e) any other circumstance the Executive Director determines poses a credible and immediate risk to public health, safety, or welfare.

(3) Procedure. (a) Suspension shall be effective upon written notice to the registrant at their address of record or electronic mail address of record, whichever the Commission determines is most likely to provide prompt notice. (b) Written notice shall state the basis for suspension and inform the registrant of the right to promptly request a hearing before a hearing officer pursuant to 935 CMR 501.500. (c) Suspension does not constitute a final determination of the underlying allegations and does not preclude revocation proceedings under 935 CMR 501.032.

(4) Duration and Reinstatement. (a) A suspension shall remain in effect pending Commission action or resolution of the underlying circumstances. (b) The Executive Director shall reinstate a suspended registration upon a determination that the basis for suspension no longer exists or that the underlying investigation has been resolved without a finding of misconduct. The Commission shall promptly update the registration status in the confidential database upon reinstatement. (c) If the Commission does not initiate revocation proceedings within 90 days of suspension, the Executive Director shall review the basis for continued suspension and shall either reinstate the registration or refer the matter to the Commission for action.

(5) Qualifying Patient Registrations. Suspension of a Qualifying Patient registration shall be used only where there is credible evidence of diversion of Medical-use Marijuana to third parties or fraud in the application. The Executive Director shall consider whether less restrictive means, including purchase limit reductions or enhanced monitoring, are adequate to address the identified risk before suspending a Qualifying Patient registration.

> *Drafter's Note: The existing framework provides no intermediate tool between denial and revocation for registrations. Suspension fills that gap, particularly for diversion allegations where action is needed quickly but a full revocation proceeding is premature. Suspension operates through the confidential database -- updating registration status to inactive is the operative mechanism by which access is restricted, consistent with the verification framework throughout 935 CMR 501.000. The framework mirrors the summary suspension authority at 935 CMR 501.350 for licenses, adapted for registrations. Qualifying Patient registrations receive heightened procedural protection given the medical access implications. The 90-day review requirement prevents indefinite suspension without Commission action. Note: the order of the registration adverse action framework is denial (501.031), termination (501.033), suspension (501.036), revocation (501.032); section numbering reflects historical sequence and does not alter the substantive framework.*

501.034: Revocation and Voluntary Surrender of Certifying Healthcare Provider Registration [AMENDED]

[Existing 501.034(1) revocation grounds retained without change. The following subsection is added:]

(2) Voluntary Surrender. A Certifying Healthcare Provider may voluntarily surrender their registration by submitting written notice to the Commission. The Commission shall confirm receipt and the registration

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shall terminate on the date specified in the notice, or, if no date is specified, upon the Commission's confirmation of receipt. A provider who surrenders a registration while under investigation or subject to pending disciplinary proceedings shall be noted as such in the Commission's records. Surrender does not preclude the Commission from completing any pending investigation or proceeding.

> *Drafter's Note: Section heading updated to reflect both revocation and the new voluntary surrender subsection. Revocation grounds at 501.034(1) are retained without change — these are conduct-based, discretionary, and require Commission action. Voluntary surrender is a distinct pathway for providers who choose to exit the program; it is not a disciplinary action and does not carry the same regulatory consequences as revocation. The note regarding pending investigations ensures that surrender cannot be used to extinguish a disciplinary proceeding.*

501.035: Void Certifying Physician Registration [DELETED]

~~[Existing 501.035 full text deleted.]~~

> *Drafter's Note: 501.035 is deleted. The section heading was a misnomer — it referred to "Certifying Physician Registration" but the body already applied to all Certifying Healthcare Providers. More fundamentally, "void" is not a defined term and carries the implication that the authority never existed, which is legally inaccurate for a validly issued registration. The triggering events in 501.035 — professional license lapse, prescribing restriction, controlled substances registration suspended or revoked — are objective and verifiable and are properly addressed through automatic suspension under 935 CMR 501.037, which provides a clear regulatory status, preserves existing patient certifications for their duration, and creates a reinstatement pathway when the triggering condition resolves. Voluntary surrender is addressed at 935 CMR 501.034(2).*

501.037: Suspension of Certifying Healthcare Provider Registration [NEW]

(1) The registration of a Certifying Healthcare Provider shall be automatically suspended, without prior notice or hearing, upon: (a) the lapse, expiration without renewal, suspension, or revocation of the provider's Massachusetts professional license; (b) the complete loss of the provider's authority to prescribe under their Massachusetts professional license; or (c) the suspension or revocation of the provider's Massachusetts controlled substances registration.

(2) During suspension: (a) the provider may not issue Written or Electronic Certifications; (b) previously issued valid certifications remain in effect for their duration. A patient whose current registration remains valid does not need a new certification until renewal; and (c) the Commission shall remove the provider from the publicly accessible opt-in provider list maintained pursuant to 935 CMR 501.820.

(3) Not later than five business days after receiving notice of suspension from the Commission, the Certifying Healthcare Provider shall notify all current patients: (a) that the provider is currently unable to issue Written Certifications; and (b) that patients should contact another registered Certifying Healthcare Provider to obtain a new certification when their current registration is due for renewal.

(4) If the Certifying Healthcare Provider fails to notify current patients within the five-business-day period required by subsection (3), the Commission may notify affected patients using information in the Commission's confidential database.

(5) The Commission shall notify the provider of the automatic suspension by written notice to the provider's physical address of record or via electronic mail to the address or addresses on file with the Commission, whichever the Commission determines is most likely to provide prompt notice. Suspension takes effect upon the triggering event, not upon receipt of notice.

(6) A provider may apply for reinstatement upon providing documentation satisfactory to the Executive Director or their designee that their professional license has been reinstated or that the complete loss of prescribing authority has been lifted. The Executive Director or their designee shall reinstate the registration upon a finding that the basis for automatic suspension no longer exists.

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(7) Automatic suspension does not preclude the Commission from initiating revocation proceedings under 935 CMR 501.034 where the circumstances also constitute grounds for revocation.

(8) The Commission may periodically cross-reference its registry of Certifying Healthcare Providers against professional licensing board records to identify providers whose licenses have lapsed or been restricted.

> *Drafter's Note: Section renamed from "Automatic Suspension" to "Suspension" to reflect that this section governs all suspension of CHP registrations, not only automatic triggers. Triggering events expanded to expressly include suspension or revocation of the provider's Massachusetts controlled substances registration, which was the basis for one of the void triggers in the deleted 501.035 and belongs here. Objective triggering events require no discretionary analysis; partial restrictions or consent agreements with conditions are addressed through revocation under 935 CMR 501.034(1). The five-business-day patient notification window places primary obligation on the provider; the Commission backstop protects patients if the provider fails to act.*

501.038: Issuance and Renewal of Registrations by Executive Director or Designee [NEW]

(1) The Executive Director or their designee may issue and renew the registrations set forth in subsection (2). A registrant that submits a complete application in compliance with all applicable requirements of 935 CMR 501.000 and pays all applicable fees shall be issued a registration or renewal. Medical Marijuana Establishment Agent registrations are governed by 935 CMR 501.030.

> *Drafter's Note: Registrations differ from licenses -- a qualifying patient, caregiver, or provider who meets eligibility requirements has a right to register. Issuance is ministerial. MME Agent registration involves background and suitability checks and is separately addressed at 935 CMR 501.030(10).*

(2) Registrations issued and renewed under this section: (a) Qualifying Patients -- 935 CMR 501.015; (b) Personal Caregivers -- 935 CMR 501.020; (c) Certifying Healthcare Providers -- 935 CMR 501.006, 501.007, 501.008, and 501.009; (d) Institutional Caregivers -- 935 CMR 501.022; and (e) Caregiving Institutions that are hospice programs, long-term care facilities, skilled nursing facilities, hospitals, licensed ambulatory care facilities, or home health agencies -- 935 CMR 501.021.

(3) The initial registration of a Caregiving Institution that does not fall within an enumerated category in subsection (2)(e) shall require approval by a vote of the Commission. Such an entity is an 'other entity providing care as authorized by the Commission' as defined in 935 CMR 501.002. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required. A denial shall be issued in writing with grounds stated and shall inform the applicant of the right to seek judicial review under M.G.L. c. 30A. Upon initial approval by the Commission, subsequent renewals are ministerial under subsection (1).

> *Drafter's Note: Only the 'other entity' catch-all requires a Commission vote -- that is a genuine discretionary determination. All enumerated healthcare entities are already licensed by the Commonwealth.*

(4) A registration or renewal shall be issued under this section only where the application is complete, all requirements are satisfied on the face of the application, and all applicable fees have been paid. A non-compliant application shall be handled under 935 CMR 501.031.

(5) The Executive Director may designate one or more Commission staff members to perform the functions described in this section. Such designation shall be made in writing.

(6) Summary data on registration activity shall be provided to the full Commission at regular intervals as determined by the Commission.

501.050: Medical Marijuana Establishments -- License Types, Caps, and Equity [AMENDED]

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501.050(1): License Types

The Commission shall license the following types of Medical Marijuana Establishments pursuant to M.G.L. c. 94I, § 7 and 935 CMR 501.000:

(a) Fully Integrated Medical Marijuana Treatment Center (FIMTC): An entity licensed under 935 CMR 501.000 to elect and perform any combination of cultivating Marijuana, manufacturing and processing Marijuana Products, and dispensing and delivering Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. A FIMTC is not required to simultaneously perform all licensed activities as a condition of licensure.

(b) Medical Marijuana Dispensary (MMD): An entity licensed under 935 CMR 501.000 to purchase, obtain, store, dispense, and deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. An MMD is not authorized to cultivate Marijuana or to Manufacture Marijuana Products. Authorized sources of supply are set forth in 935 CMR 501.106(2)(a).

501.050(2): License Caps – Ch. 65 § 36

(a) No licensee shall hold more than 3 FIMTC licenses.

(b) No licensee holding 3 FIMTC licenses shall hold any additional Medical Marijuana Establishment licenses.

(c) No licensee shall hold more than 6 MMD licenses; provided that for the first 12 months after the Commission begins accepting MMD applications, a licensee that is not a Social Equity Business shall not be granted more than 5 MMD licenses.

(d) A person functioning solely as an ESOP trustee during or after the sale of a Medical Marijuana Establishment to a licensee's employees as defined in 29 U.S.C. 1107(d)(6) is not subject to the limitations of this subsection.

(e) A person or entity holding less than 20% equity in a license and lacking direct or indirect control over operations is not subject to the limitations of this subsection.

501.050(3): Social Equity Exclusivity Period -- H.5350 § 61

(a) Medical Marijuana Dispensary licenses shall be limited on an exclusive basis to Social Equity Businesses for 24 months from the date the first MMD license receives a notice to commence operations; provided that the Commission may vote to extend the exclusivity period upon an evidence-based determination that equity goals have not been met.

(b) If data demonstrates progress toward equity goals but demand may exceed Social Equity Business supply during the exclusivity period, the Commission may vote to allow the following additional entities to apply for and hold Medical Marijuana Dispensary licenses: (i) Craft Marijuana Cooperatives as defined in 935 CMR 500.002; (ii) Massachusetts Minority Business Enterprises; (iii) Women Business Enterprises; (iv) Veteran Business Enterprises with valid SDO certification under M.G.L. c. 7, § 61; or (v) any other diverse business enterprise with a valid certification from the Supplier Diversity Office.

501.050(4): Marijuana Retailer Colocation Pathway to Medical Marijuana Dispensary License.

(1) A Marijuana Retailer currently and validly licensed under 935 CMR 500.000 that has received a notice to commence operations may apply for a Medical Marijuana Dispensary license to operate on a

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colocated basis at the same licensed premises. A Licensee may hold one Medical Marijuana Dispensary license under this subsection for each Marijuana Retailer license held. A Medical Marijuana Dispensary license issued under this subsection is not subject to the exclusivity period under 935 CMR 501.050(3).

(2) An applicant shall submit to the Commission:

(a) A completed application in a form and manner determined by the Commission;

(b) Documentation that the applicant holds a currently valid Marijuana Retailer license and has received a notice to commence operations;

(c) The applicable Medical Marijuana Dispensary application fee under 935 CMR 501.005(2); and

(d) Any other information required by the Commission.

(3) No new suitability determination, background check, or fingerprinting is required. The applicant's existing suitability finding under 935 CMR 500.000 governs. A material change in suitability shall be handled consistent with 935 CMR 501.800 and 501.801.

(4) The Commission shall act on a complete application and shall approve an applicant in good standing.

(5) A Medical Marijuana Dispensary license holder shall pay the applicable annual license fee under 935 CMR 501.005(2) and shall comply with all applicable requirements of 935 CMR 501.000.

Drafter's Note: This subsection creates an ongoing colocation pathway for existing Marijuana Retailers to hold a Medical Marijuana Dispensary license at the same licensed premises, advancing patient access through existing retail infrastructure without a duplicative licensing process. A colocated MMD issued under this subsection is an extension of an existing licensed operation, not a new market entrant, and is may be outside the Social Equity exclusivity period under 935 CMR 501.050(3) and Ch. 65 § 61. Federal rescheduling of marijuana as a Schedule III controlled substance creates new incentives for adult-use operators to participate in the medical program; this pathway ensures the Commonwealth's existing retail network can expand patient access.

501.101: Application Requirements [AMENDED -- partial]

[935 CMR 501.101(1)(a)9.a is amended to strike the requirement that an applicant for a Medical Marijuana Establishment license hold a community outreach meeting prior to licensure. All other provisions of 935 CMR 501.101 are retained without change, subject to global conforming amendments substituting 'Medical Marijuana Establishment' for 'Medical Marijuana Treatment Center' and 'license type' for 'license class' throughout.]

~~501.101(1)(a)9.a. [Community outreach meeting requirement -- full text of provision deleted.]~~

> *Drafter's Note: The community outreach meeting requirement was established in the early years of the medical marijuana program to provide communities an opportunity to engage with applicants before local permitting decisions were made. After more than a decade of program operation and the parallel maturation of the adult-use market, the requirement adds process without a corresponding regulatory benefit. Communities have extensive experience with cannabis licensees. The local permitting and zoning process, the Host Community Agreement requirement, and the Commission's licensing review already provide multiple meaningful opportunities for community input. Striking the requirement for Medical Marijuana Establishments is consistent with Ch. 65's goal of expanding and simplifying the medical program. A parallel amendment to 935 CMR 500.000 to strike the community outreach meeting requirement for adult-use Marijuana Establishments is recommended in the next available rulemaking cycle.*

501.102: Action on Applications [AMENDED]

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[Existing 501.102 is retained. Subsections (a) through (e) exist in the current regulation. The following subsection is added:]

(f) Priority Review for Medical Marijuana Dispensary Applications. In reviewing MMD applications, the Commission shall prioritize: (1) Social Equity Businesses; (2) Economic Empowerment Priority Applicants; (3) Expedited Applicants including qualifying MBE, WBE, and VBE businesses and any other diverse business enterprise with a valid certification from the Supplier Diversity Office; (4) General Applicants. Priority review shall be consistent with M.G.L. c. 94G, § § 16 & 22 and the exclusivity provisions of 935 CMR 501.050(3).

501.103: Licensure and Renewal [AMENDED -- new subsection added]

[Existing 501.103 retained without change. The following subsection is added:]

(5) The Commission may delegate to the Executive Director or their designee the authority to approve the renewal of licenses issued under 935 CMR 501.000. Any such delegation shall be made by a vote of the Commission and shall specify the scope and conditions of the delegated authority. A recommendation by the Executive Director or their designee to deny a renewal application shall be referred to the full Commission for action. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required for any Commission action on a referred renewal.

> *Drafter's Note: Permissive delegation -- Commission may delegate by vote but is not required to. Two-vote requirement for referred denials is restated per M.G.L. c. 6, § 223(e) to confirm full Commission action is required.*

(6) Conversion of Fully Integrated Medical Marijuana Treatment Center License to Medical Marijuana Dispensary License.

(1) A Fully Integrated Medical Marijuana Treatment Center currently and validly licensed under 935 CMR 501.000 may apply to convert its license to a Medical Marijuana Dispensary license.

(2) A conversion under this subsection is a modification of an existing license, not the issuance of a new license. A converted MMD license retains the same license number, license term, and host community agreement as the converting FIMTC license. The Social Equity exclusivity period applicable to new Medical Marijuana Dispensary applications under 935 CMR 501.050(3) does not apply to conversions under this subsection.

(3) An applicant for conversion shall submit to the Executive Director or their designee: (a) a written request for conversion identifying the FIMTC license to be converted; (b) where the applicant is actively conducting cultivation or manufacturing operations under its FIMTC license at the time of application, either: 1. documentation that the applicant holds currently valid 935 CMR 500.000 licenses authorizing those operations, which shall continue under those licenses following conversion; or 2. a transition plan for the wind-down or transfer of those operations prior to the effective date of conversion; (c) documentation of any 935 CMR 500.000 licenses held by the applicant or any affiliated entity that will serve as the source of supply for the converted MMD; and (d) any other information required by the Commission.

(4) A conversion does not require a new suitability determination. The applicant's existing suitability finding under 935 CMR 501.800 and 501.801 remains in effect. If the conversion application reveals a material change in suitability since the original finding, the matter shall be handled consistent with 935 CMR 501.800 and 501.801.

(5) The Executive Director or their designee shall approve a conversion where the application is complete and the applicant holds a currently valid FIMTC license in good standing. Approval shall be issued in

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writing, shall constitute an amendment to the existing license, and shall specify the effective date of conversion.

(6) Upon the effective date of conversion: (a) the converted license is a Medical Marijuana Dispensary license subject to 935 CMR 501.106 and all applicable MMD operational requirements; (b) the licensee's authority to cultivate Marijuana and manufacture Marijuana Products under its FIMTC license is terminated; and (c) the licensee's existing 935 CMR 500.000 licenses are unaffected and shall serve as the authorized vehicle for any continuing cultivation and manufacturing operations.

(7) A conversion does not affect: (a) the licensee's vested rights under its existing host community agreement; (b) any renewal or other application pending at the time of conversion; or (c) any existing investigation or enforcement proceeding.

(8) The Commission shall accept conversion applications for a period of 36 months following the date on which the Commission first begins accepting new Medical Marijuana Dispensary applications. The Commission may by vote extend this period.

> *Drafter's Note: The conversion pathway allows existing FIMTCs to consolidate their licensed activities by converting their medical license to an MMD and authorizing cultivation and manufacturing under their existing 935 CMR 500.000 licenses. This reflects the post-Ch. 65 policy goal of a unified cannabis supply chain serving both the medical and adult-use markets, with the license type determining the end recipient rather than the underlying operations. Conversion is a license modification, not a new license, and is not subject to the Social Equity exclusivity period applicable to new MMD applications under 935 CMR 501.050(3).*

501.105: General Operational Requirements for Medical Marijuana Treatment Centers [AMENDED]

(1)(a) ~~An MTC shall cultivate, process, and dispense medical use marijuana at its licensed premises. An MTC may not purchase or receive marijuana from another entity unless authorized pursuant to 935 CMR 501.120.~~

(1)(a) A Fully Integrated Medical Marijuana Treatment Center is not required to simultaneously cultivate, process, and dispense medical use marijuana as a condition of licensure. A Fully Integrated Medical Marijuana Treatment Center shall perform only those licensed activities elected in its application pursuant to 935 CMR 501.100(1) and may purchase or obtain Finished Marijuana Products and Medical-use Marijuana from other licensed Medical Marijuana Establishments and from Marijuana Establishments licensed under 935 CMR 500.000 as permitted by the Commission.

(1)(b) A Fully Integrated Medical Marijuana Treatment Center that has elected dispensing as a licensed activity pursuant to 935 CMR 501.100(1) is authorized to dispense and deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions, consistent with 935 CMR 501.140 and 935 CMR 501.145.

(1)(c) Adult-use per-serving and per-package dosing limitations under 935 CMR 500.000 do not apply to a Fully Integrated Medical Marijuana Treatment Center. A Fully Integrated Medical Marijuana Treatment Center may receive Marijuana Products from a Marijuana Product Manufacturer licensed under 935 CMR 500.000 that exceed adult-use dosing limitations, consistent with 935 CMR 500.130.

> *Drafter's Note: Adult-use dosing caps have never applied to MTCs. Subsection (1)(c) codifies the existing regulatory position and confirms FIMTCs may receive above-cap products from 500-licensed MPMs per 935 CMR 500.130.*

~~(j) An MTC may acquire Marijuana and Marijuana Product from or distribute Marijuana or Marijuana Product to another MTC or Marijuana Establishment in accordance with 935 CMR 501.140(8) and subject to the following: 1. The distribution and acquisition of Marijuana and Marijuana Product, including MIPs, to and from all other MTCs does not exceed, cumulatively, 45% of the MTC's total annual inventory... [full prior subsection deleted].~~

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> *Drafter's Note: Struck. The 45% acquisition cap was a product of the vertically integrated model. With vertical integration no longer required, a FIMTC electing cultivation-only or manufacturing-only exists precisely to supply other MMEs. The cap is directly contrary to the post-Ch. 65 program structure.*

[All other subsections of 501.105 retained without change, subject to global conforming amendments: 'MTC Agent' becomes 'Medical Marijuana Establishment Agent' and 'MIPs' becomes 'Marijuana Products' throughout.]

501.106: General Operational Requirements for Medical Marijuana Dispensaries [NEW]

501.106(1): General

A Medical Marijuana Dispensary shall comply with the same dispensing and delivery operational requirements applicable to a Fully Integrated Medical Marijuana Treatment Center under 935 CMR 501.105, as applied to dispensing operations, together with the additions and modifications specific to the MMD license type set forth in this section.

> *Drafter's Note: Cross-references FIMTC dispensing framework to keep all MME dispensing standards within 935 CMR 501 rather than importing adult-use retail requirements from 935 CMR 500.*

501.106(2): Authorized Operations

An MMD is authorized to:

(a) Purchase or obtain Finished Marijuana and Marijuana Products and Medical-use Marijuana from: (1) a Fully Integrated Medical Marijuana Treatment Center licensed under 935 CMR 501.000; (2) a Medical Marijuana Dispensary licensed under 935 CMR 501.000; (3) a Marijuana Cultivator licensed under 935 CMR 500.000; (4) a Marijuana Product Manufacturer licensed under 935 CMR 500.000; or (5) a Marijuana Retailer licensed under 935 CMR 500.000;

(b) Repackage, label, store, and dispense Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions;

(c) Deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions, directly or through contracted delivery arrangements consistent with 935 CMR 501.145; and

(d) Transport Medical-use Marijuana between its own licensed locations.

> *Drafter's Note: Medical channel sources first (FIMTC, MMD), 500-licensed sources second (Cultivator, MPM, Retailer). Transfer authorization enabling 500-licensed entities to supply MMEs is in 935 CMR 500.000.*

501.106(3): Dosing Limitations

Adult-use per-serving and per-package dosing limitations under 935 CMR 500.000 do not apply to a Medical Marijuana Dispensary. An MMD may receive and dispense Marijuana Products from a Marijuana Product Manufacturer licensed under 935 CMR 500.000 that exceed adult-use dosing limitations, provided that such products are dispensed exclusively to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions, and are not transferred or sold to any adult-use Marijuana Establishment or Consumer.

501.106(4): Patient and Institutional Verification and Dispensing

An MMD may dispense Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. Verification

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requirements, purchase limits, and record-keeping obligations applicable to all Medical Marijuana Establishments are governed by 935 CMR 501.140.

501.106(5): Security Requirements

An MMD shall comply with security requirements applicable to MTCs under 935 CMR 501.110.

501.106(6): Delivery Authorization

(a) Delivery of Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions is an authorized activity within the Medical Marijuana Dispensary license. Delivery is permitted but not mandatory. No separate Delivery Endorsement is required.

(b) An applicant intending to deliver shall include a delivery plan in its application as required by 935 CMR 501.100(2)(c).

(c) An MMD seeking to commence delivery after licensure shall submit to the Executive Director or their designee: (1) a written request describing proposed delivery operations; (2) delivery Standard Operating Procedures addressing patient, caregiver, and institutional verification, chain-of-custody documentation, manifest procedures, failed delivery procedures, and vehicle security; and (3) any other information required by the Commission.

(d) The Executive Director or their designee shall issue a written decision within 30 days of a complete submission. The Executive Director shall either approve the request or refer it to the full Commission with a written recommendation. If referring, the Executive Director shall: (i) issue written notice to the MMD with specific grounds for the recommendation; and (ii) afford the MMD 21 days to respond before the matter is placed on the Commission agenda.

(e) The matter shall be referred to the full Commission for action. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required for any Commission action. A denial shall be issued in writing and shall inform the MMD of the right to seek judicial review under M.G.L. c. 30A.

(f) Material changes to delivery operations are subject to notification under 935 CMR 501.104.

501.120: Additional Operational Requirements for Cultivation, Acquisition, and Distribution [AMENDED]

[Existing 501.120 is retained for Fully Integrated MTCs with global conforming amendments. Subsections (a) through (f) exist in the current regulation. The following subsection is added:]

(g) Medical Marijuana Dispensary Acquisition. A Medical Marijuana Dispensary may acquire Medical-use Marijuana and Finished Marijuana Products from: (1) a Fully Integrated Medical Marijuana Treatment Center licensed under 935 CMR 501.000; (2) a Medical Marijuana Dispensary licensed under 935 CMR 501.000; (3) a Marijuana Cultivator licensed under 935 CMR 500.000; (4) a Marijuana Product Manufacturer licensed under 935 CMR 500.000; or (5) a Marijuana Retailer licensed under 935 CMR 500.000. All acquisitions shall be documented in the Commission's seed-to-sale tracking system and accompanied by required manifests and testing documentation.

> *Drafter's Note: Medical sources first (FIMTC, MMD), 500-licensed sources second (Cultivator, MPM, Retailer) -- consistent with 935 CMR 501.106(2)(a).*

501.140: Patient Sales [AMENDED]

[Existing 501.140 is retained and amended as follows:]

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501.140(2)(a): Verification of Patient and Caregiver Certification [AMENDED]

[935 CMR 501.140(2)(a) and the enumerated sub-items at 501.140(2)(a)(1)(a)-(d) are amended as shown. The unified standard applies to both in-store dispensing and delivery. The enumerated list of acceptable government-issued identification types is struck.]

~~Upon entry into an MTC by a Registered Qualifying Patient or Personal Caregiver, or arrival at a residence for delivery to a Registered Qualifying Patient or Personal Caregiver, an MTC or Marijuana Courier Agent shall immediately inspect the Patient's or caregiver's temporary or annual Registration Card and proof of government-issued identification.~~

~~The government-issued identification card shall contain a name, photograph, and date of birth, and shall be limited to one of the following: (a) a driver's license; (b) a government issued identification card; (c) a military identification card; or (d) a passport.~~

A Medical Marijuana Establishment shall verify the identity and registration status of a Registered Qualifying Patient or Personal Caregiver prior to dispensing, whether in-store or at point of delivery, by: (1) confirming that the individual presents either: (a) a valid Registration Card; or (b) a valid government-issued photo identification; and (2) confirming through the Commission's Confidential Database that the individual's registration is current and valid.

> *Drafter's Note: Unified verification standard for in-store and delivery dispensing. Either credential -- the Commission-issued Registration Card or a valid government-issued photo identification -- is sufficient, provided the Commission's Confidential Database confirms current and valid registration in both cases. The enumerated list of specific ID types is struck; 'valid government-issued photo identification' is the operative standard and is broad enough to include the Massachusetts Commission for the Blind identification card as required by M.G.L. c. 6, § 135 and any other government-issued photo credential. The Registration Card definition at 935 CMR 501.002 already provides that Registration Cards may be physical or electronic.*

(15) A Medical Marijuana Establishment may dispense Medical-use Marijuana to: (a) Registered Qualifying Patients; (b) Personal Caregivers; and (c) Institutional Caregivers acting on behalf of Registered Qualifying Patients of their registered Caregiving Institution.

(16) A registered Caregiving Institution may obtain Medical-use Marijuana for its Registered Qualifying Patients through any of the following pathways: (a) by placing an order with a licensed Medical Marijuana Establishment through a registered Institutional Caregiver pursuant to 935 CMR 501.021(7); (b) by an Institutional Caregiver purchasing in person at a licensed Medical Marijuana Establishment pursuant to 935 CMR 501.022(9); or (c) by receiving delivery of Medical-use Marijuana at the Caregiving Institution premises pursuant to 935 CMR 501.145(3).

> *Drafter's Note: Single authoritative statement of authorized dispensing recipients for all MMEs. Subsection (16) consolidates the three pathways through which a registered Caregiving Institution may access Medical-use Marijuana, with cross-references to the mechanics governing each.*

501.145: Patient Delivery -- Statewide Authorization, Verification, and Delivery Arrangements [AMENDED]

501.145(1): Statewide Delivery Authorization

A Medical Marijuana Establishment authorized by the Commission to deliver Medical-use Marijuana may deliver to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions in all municipalities in

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the Commonwealth. A municipality may not prohibit the delivery of Medical-use Marijuana within its borders by a licensed Medical Marijuana Establishment.

> *Drafter's Note: H.5350 § 25 establishes a municipal opt-out for adult-use delivery under M.G.L. c. 94G. That mechanism does not apply to medical delivery under M.G.L. c. 94I.*

501.145(2): Point-of-Delivery Verification -- Individual Recipients

~~Pre-verification. Prior to delivering Medical-use Marijuana to a Registered Qualifying Patient or Personal Caregiver, a Medical Marijuana Establishment shall conduct a pre-verification of the patient's or caregiver's identity and registration status, which shall include an in-person examination of the patient's or caregiver's identification prior to the first delivery.~~

> *Drafter's Note: Prior in-person pre-verification requirement eliminated. Patient and caregiver registration is verifiable in real time through the Commission's confidential database.*

(a) A Medical Marijuana Establishment delivering Medical-use Marijuana to a Registered Qualifying Patient or Personal Caregiver shall verify the identity and registration status of the recipient at the point of delivery consistent with the verification standard at 935 CMR 501.140(2)(a).

> *Drafter's Note: Cross-references the unified verification standard at 501.140(2)(a). The same standard applies at the point of delivery as applies in-store.*

501.145(3): Point-of-Delivery Verification -- Caregiving Institution Deliveries

(a) A Medical Marijuana Establishment delivering Medical-use Marijuana to a registered Caregiving Institution shall, at the point of delivery: (1) confirm that the authorized representative presents a current and valid Institutional Caregiver Registration Card; and (2) confirm through the Commission's Confidential Database that both the Institutional Caregiver's registration and the Caregiving Institution's registration are current and valid.

(b) Each delivery to a Caregiving Institution shall be accompanied by a patient manifest identifying: (1) each Registered Qualifying Patient for whom product is being delivered; (2) the quantity and type of Medical-use Marijuana attributable to each patient; and (3) the Caregiving Institution's registration number and the delivering Medical Marijuana Establishment's license number.

(c) The Institutional Caregiver shall sign the delivery manifest acknowledging receipt of the products identified therein.

(d) The delivering Medical Marijuana Establishment shall record the delivery transaction in the Commission's seed-to-sale tracking system and the Commission's Confidential Database, attributing products delivered and dispensing against each identified patient's allotment per the delivery manifest.

(e) The Institutional Caregiver shall log receipt of the delivery and subsequent administration to each patient in the patient's record maintained by the Caregiving Institution, consistent with 935 CMR 501.021(9).

> *Drafter's Note: Verification for CI deliveries uses the Institutional Caregiver Registration Card plus Confidential Database confirmation of both the IC and CI registration. No individual patient Registration Card or government-issued photo identification is required at the point of delivery -- the IC acts as the institution's authorized agent. Recording is required in both seed-to-sale and the Confidential Database to maintain inventory integrity and enforce patient allotment limits across all dispensing channels.*

501.145(4): Personal Caregiver Ordering and Delivery Permutations

(a) A Personal Caregiver may place an order for Medical-use Marijuana on behalf of a Registered Qualifying Patient and may designate either the patient's residence or the caregiver's own residence as the delivery address.

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(b) Point-of-delivery verification is determined by who receives the delivery. Whether the Registered Qualifying Patient or Personal Caregiver receives the delivery, verification is per the standard at 935 CMR 501.140(2)(a), applied using the receiving party's credentials.

(c) The Medical Marijuana Establishment shall confirm through the Commission's Confidential Database that both the patient's and caregiver's registrations are current and valid at the time of delivery, regardless of which party receives the delivery.

501.145(5): Third-Party Delivery Arrangements

(a) A Medical Marijuana Establishment authorized to deliver may deliver directly to authorized recipients using its own licensed delivery personnel and vehicles, consistent with its approved delivery Standard Operating Procedures.

(b) A Medical Marijuana Establishment may enter into a written delivery agreement with another Medical Marijuana Establishment authorized to deliver under 935 CMR 501.145. Any such agreement shall be disclosed to the Commission and shall comply with all applicable delivery requirements.

(c) A Medical Marijuana Establishment may enter into a written delivery agreement with a Marijuana Courier licensed under 935 CMR 500.000. A Marijuana Courier operating under a medical delivery agreement shall comply with the verification requirements of 935 CMR 501.145(2) or 935 CMR 501.145(3) as applicable and shall not deliver to any Consumer under such agreement.

(d) A delivery agreement shall at minimum: (1) identify the parties and their licensed premises; (2) specify the geographic scope of delivery; (3) address chain-of-custody, manifesting, and tracking responsibilities; (4) require compliance with 935 CMR 501.145(2) or 935 CMR 501.145(3) as applicable at point of delivery; and (5) be provided to the Commission upon request.

501.170: Municipal Requirements [AMENDED -- extended to all Medical Marijuana Establishments]

[Existing 501.170 retained and extended to all Medical Marijuana Establishments. The umbrella term captures any future license types authorized under M.G.L. c. 94I, § 7. All Medical Marijuana Establishments are subject to the same municipal requirements as Fully Integrated MTCs.]

501.180-501.181: Host Community Agreement and Equity Standards [AMENDED -- extended to all Medical Marijuana Establishments]

[Existing provisions retained and extended to all Medical Marijuana Establishments. The Commission shall: (a) develop a model host community agreement applicable to Medical Marijuana Establishments; (b) establish procedures and policies for municipalities to promote and encourage full participation in the regulated medical marijuana industry during HCA negotiations with Social Equity Businesses and Economic Empowerment Priority Applicants; and (c) promote and encourage full participation by people from communities disproportionately harmed by marijuana prohibition, consistent with M.G.L. c. 94I, § 7 and 935 CMR 501.050(3).]

501.200: Counties of Dukes County and Nantucket -- Transport of Medical-use Marijuana Over State Territorial Waters [AMENDED]

[Existing 501.200 is retained and amended to incorporate the following subsection governing overwater transport. This section establishes the operative regulatory standard; it supersedes Administrative Order No. 3 (June 13, 2024) with respect to Medical Marijuana Establishments licensed under 935 CMR

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501.000 upon the effective date of this amendment. A parallel amendment to 935 CMR 500.200 is required to extend these standards to adult-use Marijuana Establishments; that amendment is not included in this redline.]

(3) Transport of Medical-use Marijuana Over State Territorial Waters.

(a) A Medical Marijuana Establishment licensed under 935 CMR 501.000 and located in or servicing the Counties of Dukes County or Nantucket may transport Medical-use Marijuana over State Territorial Waters on a Seaworthy Vessel, subject to the requirements of this subsection.

(b) Only a Seaworthy Vessel may be used to transport Medical-use Marijuana over State Territorial Waters. The Seaworthy Vessel must be inspected and approved by the Commission before the Medical Marijuana Establishment may commence transport.

(c) Prior to commencing transport, the Medical Marijuana Establishment shall submit a Standard Operating Procedure to the Commission describing its procedures for compliance with this subsection. Transport may not commence until the SOP is approved by the Commission and the Seaworthy Vessel has been inspected and approved.

(d) All transport routes shall remain within the Commonwealth of Massachusetts, including within State Territorial Waters. Route randomization is not required for overwater transport; however, the Medical Marijuana Establishment shall ensure that departure dates and times are randomized.

(e) A Medical Marijuana Establishment may hire or contract with a Captain who is not a Medical Marijuana Establishment Agent to navigate the Seaworthy Vessel. The Captain shall not have contact with or control of the Medical-use Marijuana, which shall remain under the control of the Medical Marijuana Establishment's Agent or Agents at all times during transport.

(f) A Seaworthy Vessel is not subject to Massachusetts Registry of Motor Vehicles requirements but shall comply with all applicable boat registration requirements. No Seaworthy Vessel shall bear any external marking indicating that it is used to transport Medical-use Marijuana.

(g) Medical-use Marijuana shall be secured in a locked storage compartment that is affixed to the Seaworthy Vessel and cannot be easily moved. The compartment shall be accessible only to authorized Medical Marijuana Establishment Agents during transport. Commission representatives, representatives of other state agencies, and emergency responders shall have access to the Seaworthy Vessel upon request.

(h) The Medical Marijuana Establishment shall develop and maintain emergency policies and procedures for securing all Medical-use Marijuana on the Seaworthy Vessel following any instance of diversion, theft, or loss.

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(i) Medical-use Marijuana transported between the mainland and the Counties of Dukes County or Nantucket shall be tested by an Independent Testing Laboratory consistent with 935 CMR 501.160. Testing shall occur prior to transport.

> *Drafter's Note: This subsection incorporates the substance of Administrative Order No. 3 (June 13, 2024) into 935 CMR 501.000 with the full force of regulation. The administrative order was issued to address the lack of licensed cannabis access in Dukes County and Nantucket County and has been in effect since June 14, 2024. Codification eliminates the regulatory uncertainty inherent in reliance on an administrative order and provides licensees and the public with clear, stable regulatory standards. The security standard is articulated directly rather than by reference to the Alternative Security Provision process -- overwater transport is a well-defined and recurring operational scenario that warrants a specific regulatory standard, not case-by-case ASP review. A parallel amendment to 935 CMR 500.200 is required to extend these standards to adult-use Marijuana Establishments.*

501.400 and 501.450: Grounds for Denial, Suspension, Revocation [AMENDED]

[Existing grounds (a) through (m) are retained with global conforming amendments. The following additional ground is added:]

(n) Acquiring Medical-use Marijuana or Finished Marijuana Products from an entity not authorized to supply Medical Marijuana Establishments under 935 CMR 501.106(2)(a).

> *Drafter's Note: Express enforcement ground for sourcing compliance. General non-compliance grounds would technically cover this but a specific ground provides clearer notice to licensees.*

501.802: Suitability Standard for Registration as a Medical Marijuana Establishment Agent [AMENDED]

~~Suitability Standard for Registration as a Medical Marijuana Treatment Center Agent~~ -- section heading amended. Existing suitability standards retained and apply to all MME Agents of any Medical Marijuana Establishment. Enumeration of specific license types removed -- umbrella term captures any additional MME license types the Commission may authorize.

501.820: Confidentiality [AMENDED -- opt-in provider list added]

[935 CMR 501.820(1) — unchanged]

(2) The following records shall be deemed confidential and the Commission shall not disclose them except as provided in 935 CMR 501.820(3):

(a) *[unchanged]*

(b) All research submissions required under 935 CMR 500.147 pursuant to a research permit approved by the Commission relating to the medical use of marijuana by Qualifying Patients, including research protocols, data, findings, results, or reports submitted by a Marijuana Research Facility Licensee.

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(c) Other identifying patient information. *[formerly (2)(b), renumbered]*

Drafter's Note: The introductory language of 501.820(2) is revised to clarify that records listed thereunder are deemed confidential and subject to disclosure only as provided in 501.820(3), closing a potential ambiguity in the prior text. A new 501.820(2)(b) designates research submissions relating to the medical use of marijuana by Qualifying Patients as confidential. The phrase "relating to the medical use of marijuana by Qualifying Patients" is intended to capture all research within the medical cannabis program — including research using de-identified or aggregate data — without requiring that Qualifying Patients participate directly as research subjects. Clinical trial submissions are the clearest application, as such records constitute records and communications related to qualifying patient care within the meaning of M.G.L. c. 94I, § 3(b). The basis for non-disclosure rests on three independent and mutually reinforcing grounds: (i) M.G.L. c. 94I, § 3(b) is itself a statutory declaration of confidentiality, providing that every registered qualifying patient shall have the right to confidentiality of all records and communications related to their care provided by a medical use marijuana licensee or establishment, which independently triggers Exemption (a) of the Public Records Law, M.G.L. c. 66, § 10, particularly for clinical trial and patient-linked research; (ii) this regulation implements § 3(b) and independently designates such research as confidential, providing a regulatory basis for Exemption (a) for the broader category of medical use research not directly involving patient care records; and (iii) the Commission's broad rulemaking authority under M.G.L. c. 94I and the catch-all provision of § 3(a) authorizing designation of pertinent information as confidential provide an independent basis for non-disclosure for any research not directly captured by § 3(b). Existing 501.820(2)(b) is renumbered (2)(c).

[935 CMR 501.820(3) — unchanged]

(4) Opt-In Certifying Healthcare Provider Public List. Notwithstanding the confidentiality provisions of 935 CMR 501.820, a Certifying Healthcare Provider registered under 935 CMR 501.000 may elect to have their name, specialty, and business contact information included on a publicly available provider list maintained by the Commission. Such election shall be made in writing in a form and manner determined by the Commission and may be withdrawn at any time. The Commission shall maintain and publish the provider list on its website. No other information about a registered Certifying Healthcare Provider shall be disclosed pursuant to this subsection.

Drafter's Note: 935 CMR 501.820(4) is added to establish an opt-in public list for Certifying Healthcare Providers. No publicly accessible list of registered CHPs currently exists. The opt-in mechanism allows providers who wish to be findable by patients to make their name, specialty, and business contact information publicly available while preserving confidentiality for those who do not opt in. The provision operates independently of the permitted disclosure framework in 501.820(3) — the Commission is not disclosing confidential information but rather facilitating a provider's voluntary election to appear on a separate public list. Existing 935 CMR 501.820(4) is renumbered (5).

(5) Nothing in 935 CMR 501.820 shall prevent the Commission from acting in accordance with its authority. *[formerly (4), renumbered]*

Drafter's Note: A corresponding confidentiality section, 935 CMR 500.820, should be added to the adult-use regulations to mirror the provisions of 935 CMR 501.820, with conforming changes appropriate to the adult-use framework.

IV. Minimum Necessary Amendments to 935 CMR 500.000

The following amendments to 935 CMR 500.000 are the minimum necessary to implement the transfer authorization between adult-use licensees and Medical Marijuana Establishments and to create the dosing limitation carve-out for the medical channel.

935 CMR 500.000: Transfer Authorization to Medical Marijuana Establishments [NEW PROVISION]

[The following new provision is added to 935 CMR 500.000 at a location to be determined by Commission legal staff consistent with the regulation's structure:]

Transfer Authorization to Medical Marijuana Establishments. A Marijuana Cultivator, Marijuana Product Manufacturer, or Marijuana Retailer licensed under 935 CMR 500.000 may Transfer Marijuana or Marijuana Products to a Medical Marijuana Establishment licensed under 935 CMR 501.000, subject to the requirements of 935 CMR 501.000. Such Transfers shall be documented in the Commission's seed-to-sale tracking system and accompanied by required manifests and testing documentation.

> *Drafter's Note: Targeted transfer authorization. Expanding the Marijuana Establishment definition in 935 CMR 500.002 to include MMEs would risk importing 500 requirements into the medical program and conflate two distinct statutory schemes -- MMEs under M.G.L. c. 94I and MEs under M.G.L. c. 94G. This provision achieves supply chain integration without that ambiguity.*

935 CMR 500.130: Production and Transfer of Marijuana Products to Medical Marijuana Establishments [NEW SUBSECTION]

[The following new subsection is added to 935 CMR 500.130: Additional Operational Requirements for Marijuana Product Manufacturers:]

(x) Production and Transfer of Marijuana Products to Medical Marijuana Establishments. Dosing Limitation Carve-Out. Notwithstanding any per-serving or per-package dosing limitations otherwise applicable to Marijuana Products under 935 CMR 500.000, a Marijuana Product Manufacturer licensed under 935 CMR 500.000 may manufacture, produce, and transfer Marijuana Products in excess of those limitations, provided that: (a) such products are manufactured and produced exclusively for transfer to Medical Marijuana Establishments licensed under 935 CMR 501.000; (b) such products are transferred exclusively to Medical Marijuana Establishments licensed under 935 CMR 501.000 and are not transferred to any adult-use Marijuana Establishment or sold or distributed to any Consumer; (c) the transfer is documented in the Commission's seed-to-sale tracking system and accompanied by manifest and chain-of-custody documentation identifying the products as Medical-use Marijuana; and (d) the products are tested and labeled in compliance with 935 CMR 501.000 and applicable Commission testing protocols.

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A Marijuana Product Manufacturer's authority under this subsection is limited to production for the medical channel and does not authorize the sale or distribution of such products through any adult-use retail channel.

> *Drafter's Note: Two authorizations required: production and transfer. Without production authorization, a 500-licensed MPM has no regulatory basis to produce above-cap products. Without transfer restriction, above-cap products could flow into the adult-use market. Together they create a closed medical channel. Corresponding enforcement ground at 935 CMR 500.450(x).*

935 CMR 500.450: New Enforcement Ground [AMENDED]

[The following additional ground is added to 935 CMR 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications:]

(x) Transferring Marijuana Products exceeding adult-use per-serving or per-package dosing limitations to any entity other than a Medical Marijuana Establishment licensed under 935 CMR 501.000, in violation of 935 CMR 500.130(x)(b).

> *Drafter's Note: Supply-side enforcement counterpart to 935 CMR 501.450(n). An MPM that diverts above-cap products to the adult-use market is subject to suspension, revocation, or denial of renewal.*

V. Summary Table of Amended Sections

The following table summarizes all sections amended by this redline:

Section	Title	Summary of Changes
501.001	Purpose	Updated statutory references; session law citation (St. 2017, c. 55) struck per Regulations Manual; M.G.L. c. 6, § 223 added
501.002	Definitions	New: FIMTC, MMD, Medical Marijuana Establishment, MME Agent (umbrella), Executive Director, Social Equity Business, Medical-use Marijuana (consolidated); Amended: Commission, Qualifying Patient (no residency), Registration Card (physical or electronic), Caregiving Institution (expanded); Deleted: MIP; MTC simplified
501.003	CMOs	Updated to Medical Marijuana Establishment umbrella; both FIMTCs and MMDs eligible
501.005(1)	Fees -- FIMTC	No change
501.005(2)	Fees -- MMD	$1,500 application / $10,000 annual / $5,000 change of location; full fee schedule
501.005(3)	Fees -- MMD Equity	Application fee waived; 50% annual reduction; SDO catch-all throughout
501.005(4)	Fees -- MME Agent	Lab Agent reference removed; $115 initial and renewal; items corrected to (a)/(b)
501.005(5)	Fees -- CI / IC	$500/$300 CI; $50/$25 IC; items corrected to (a)-(f)
501.005(6)	Fees -- Certifying HCP	No fee
501.009 [NEW]	CHP 3-Year Renewal	Three-year renewal; attestation requirements; lapse rules; denial referred to Commission

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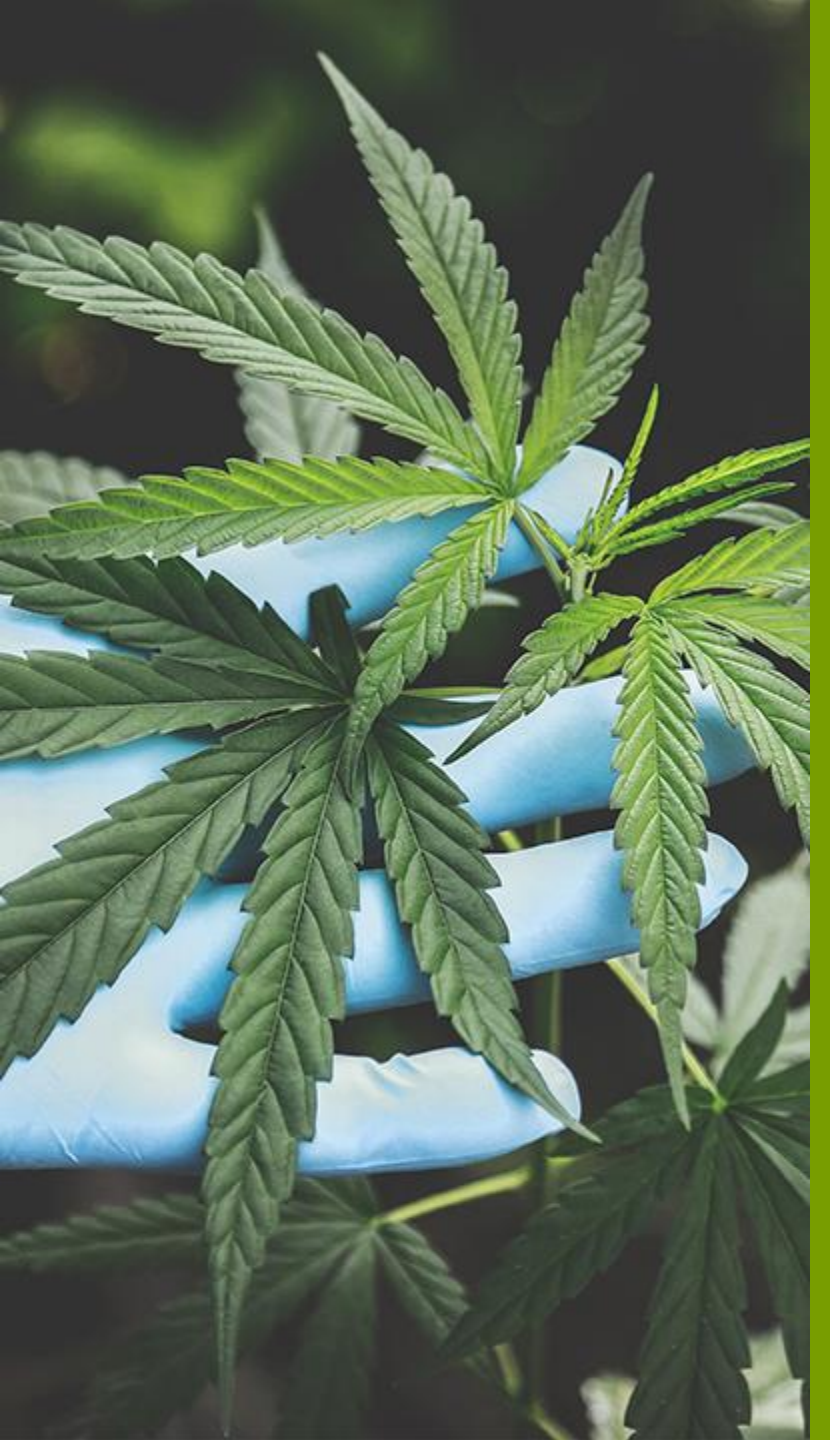
501.010(10)	Pediatric Certification	Two Certifying Healthcare Providers (not Physicians only); MA licensed removed as redundant; parenthetical removed; specialty requirement retained
501.015	Patient Registration	Residency requirement and end-of-life carve-out struck; open enrollment
501.021	Caregiving Institutions	Facility enumeration removed from body; cross-ref to definition; (2) destruction obligation struck; (6) terminates replacing void language; ordering authority (7); on-site consumption (8); administration records (9); CI renewal (10)-(11)
501.022	Institutional Caregivers	(3) void replaced with terminates; promptly replacing one business day; (4) deleted -- superseded by (10); (7) available for inspection replacing carry Registration Card; IC in-person purchasing (9); IC renewal (10)-(11)
501.025	Responsibilities of Caregivers	501.025(2)(a) IC affirmative authority amended: in-person purchasing and ordering added as authorized activities with cross-references to operative sections; 501.025(1) and 501.025(2)(b)-(c) unchanged
501.029	ITL Agents	Streamlined to cross-reference 935 CMR 500.000
501.030	MME Agent Registration	Renamed; ED delegation added; suitability concerns referred to full Commission
501.040	Leadership Rating Program	Full text deleted; program was never implemented and MTC-specific structure is incompatible with new MME license framework
501.052	Independent Testing Laboratories	Streamlined to cross-reference 935 CMR 500.000; ITLs licensed exclusively under 500 since program transfer from DPH
501.032 [AMENDED]	Revocation of Registration	Conforming amendment: “Registration Card” replaced with “registration” throughout to align with registration-centered framework; logical reading order noted as denial (501.031), termination (501.033), suspension (501.036), revocation (501.032)
501.033 [AMENDED]	Termination of Registration	Full text replaced; “void” replaced with “terminates” throughout; recentered on registrations not cards; database update obligation added; residency trigger struck; personal caregiver termination corrected for multi-patient scenario
501.036 [NEW]	Suspension of Registration	New intermediate tool between denial and revocation; ED authority; database update operative mechanism; heightened protection for patient registrations; 90-day review requirement
501.034 [AMENDED]	Revocation and Voluntary Surrender -- CHP	Section heading updated; revocation grounds retained; voluntary surrender subsection added; surrender during pending proceedings noted in records
501.035 [DELETED]	Void Certifying Physician Registration	Full text deleted; “void” concept replaced by suspension framework at 501.037; section title was also a misnomer (applied to all CHPs, not just physicians); CSR suspension/revocation trigger moved to 501.037(1)(c)
501.037 [NEW]	CHP Suspension	Renamed from “Automatic Suspension”; triggers expanded to include CSR suspension/revocation; provider notifies patients within 5 business days; Commission backstop; reinstatement pathway

501.038 [NEW]	Action on Registrations	Ministerial issuance by ED; enumerated CIs ministerial; other entities require Commission vote for initial; all renewals ministerial; reporting at regular intervals
501.050	License Types / Caps / Equity	License type throughout; two license types; caps per H.5350; equity exclusivity with SDO catch-all; dosing limitations moved to 501.105 and 501.106
501.102	Action on Applications	Priority review for MMD applications; SDO catch-all
501.103	Licensure and Renewal	Permissive delegation to ED by vote; denial referral to full Commission; two votes required per M.G.L. c. 6, § 223(e). New subsections (5) and (6): delegation and conversion pathway from FIMTC to MMD -- not a new license; not subject to Social Equity exclusivity; ministerial ED approval; 36-month window
501.105	FIMTC Operational Requirements	Vertical integration not required; dispensing to patients, caregivers, ICs and CIs; dosing: adult-use caps inapplicable; may receive above-cap from 500 MPMs per 500.130; 501.105(j) struck
501.106 [NEW]	MMD Operational Requirements	Self-contained MMD operational section; sourcing: medical first (FIMTC, MMD), 500-licensed second; dosing: adult-use caps inapplicable; delivery as licensed activity; post-licensure delivery ED approval
501.120(g)	MMD Acquisition	Sourcing: medical sources first (FIMTC, MMD), 500-licensed second
501.140	Patient Sales	Authoritative recipient statement for all MMEs at (15): patients, personal caregivers, ICs acting for CIs; CI access framework at (16): ordering, IC in-person pickup, delivery
501.145	Patient Delivery	Statewide; no municipal opt-out; pre-verification eliminated; CI delivery: IC Registration Card + database confirmation + patient manifest + logging; personal caregiver: no post-delivery logging (intentional); personal caregiver ordering permutations; contracted delivery through other MMEs or licensed Couriers
501.170	Municipal Requirements	Extended to all Medical Marijuana Establishments
501.180-501.181	HCA / Equity	Extended to all Medical Marijuana Establishments
501.400, 501.450	Denial / Revocation	New ground (n): acquiring from unauthorized source
501.802	Suitability -- MME Agent	Renamed; license type enumeration removed
501.820	Confidentiality	New opt-in CHP public provider list; withdrawable at any time
500.000 Transfer Auth	500 -- Transfer to MMEs	Marijuana Cultivators, MPMs, and Marijuana Retailers may Transfer to MMEs; MMEs not characterized as Marijuana Establishments; M.G.L. c. 94G / c. 94I statutory distinction preserved
500.130(x)	500 -- MPM Dosing Carve-Out	Production authorization + transfer restriction: manufacture and transfer above-cap products exclusively to licensed MMEs; seed-to-sale; chain-of-custody; no adult-use channel
500.450(x)	500 -- MPM Enforcement	New ground: transferring above-cap products to unauthorized entity is grounds for suspension / revocation / denial of renewal

Global	Conforming Amendments	License type/types throughout; Medical Marijuana Establishments as umbrella; MTC Agent -> MME Agent; M.G.L. c. 10, § 76 -> M.G.L. c. 6, § 223; MIPs -> Marijuana Products; citation structure corrected per MA Regulations Manual hierarchy

This redline is a draft for review and discussion purposes only.

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Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Cannabis Control Commission

Public Meeting

September 17, 2026 at 10:00 am

Hybrid via Microsoft Teams



Agenda

1. Call to Order
2. Commissioners' Comments and Updates
3. Minutes
4. Executive Director and Commission Staff Report
5. Staff Recommendations on Change of Ownership
6. Staff Recommendations on Final Licenses
7. Staff Recommendations on Provisional Licenses
8. Staff Recommendations on Responsible Vendor Training
9. Enforcement Actions
10. Hearing Officer Decision
11. Commission Discussion and Votes
12. New Business Not Anticipated at the Time of Posting
13. Next Meeting Date
14. Adjournment

Cannabis Control Commission
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Commissioner Comments and Updates

Cannabis Control Commission

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Minutes

Minutes

1. July 30, 2026

Cannabis Control Commission

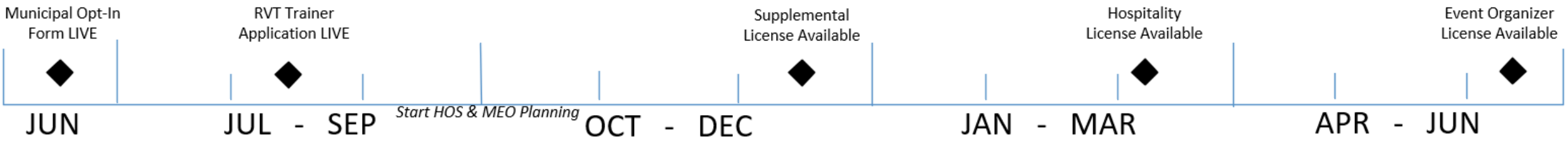
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Executive Director and Commission Staff Report

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Social Consumption Regulatory Implementation Project

Project Timeline



COMPLETE

- ✓ RVT Application Live
- ✓ RVT Trainer Compliance Audit Process
- ✓ HCA Model Template Updates
- ✓ Supplemental License Application Final Draft
- ✓ License Automation Assessment
- ✓ Supplemental Inspection Framework
- ✓ Consumer Education Content
- ✓ Public Education RFQ
- ✓ Public Education Ext. Working Group Meeting

In Progress

- ➢ RVT Program – Future State Assessment
- ➢ HCA Guidance Updates
- ➢ Defined License Automation Requirements
- ➢ Supplemental Inspection Resources
- ➢ Existing Operational Process Review & Updates
- ➢ Shelf Stable Food Guidance
- ➢ Reporting Requirements Guidance
- ➢ Hospitality & Event Organizer Requirements Assessment
- ➢ Event Organizer Compliance & Enforcement Assessment

'Available' dates are tentative and subject to change

Next Steps

- Publish HCA Model Template & Guidance Documents
- Publish Public Education Materials
- Finalize Streamlined Supplemental License Process and Launch by End of December
- Complete Off-Hours Inspection Requirements
- Complete updates to all internal processes, documents, and hold staff trainings
- Start Scoping Hospitality & Marijuana Event Organizer License Requirements

Key Risks / Considerations

- **Critical Resource Capacity Constraints:** Changes in staffing levels and team capacity present a significant risk, impacting knowledge retention, workload distribution, and timely completion of deliverables
- **Technology Requirements**: Automation opportunities have been identified, but limited capacity to complete may impact the speed at which solutions are developed and deployed
- **Expanding Initiatives:** Additional initiatives create competing demands for resources, increasing the need for cross-project coordination
- **Project Management Resources:** This complex initiative relies on manual processes rather than integrated project management tools, increasing coordination efforts and creating additional administrative burden

Cannabis Control Commission

COMMONWEALTH OF MASSACHUSETTS

Licensing Data Updates

Commence Operations| September 17, 2026

The totals below are a snapshot of current Commence Operations licensees.

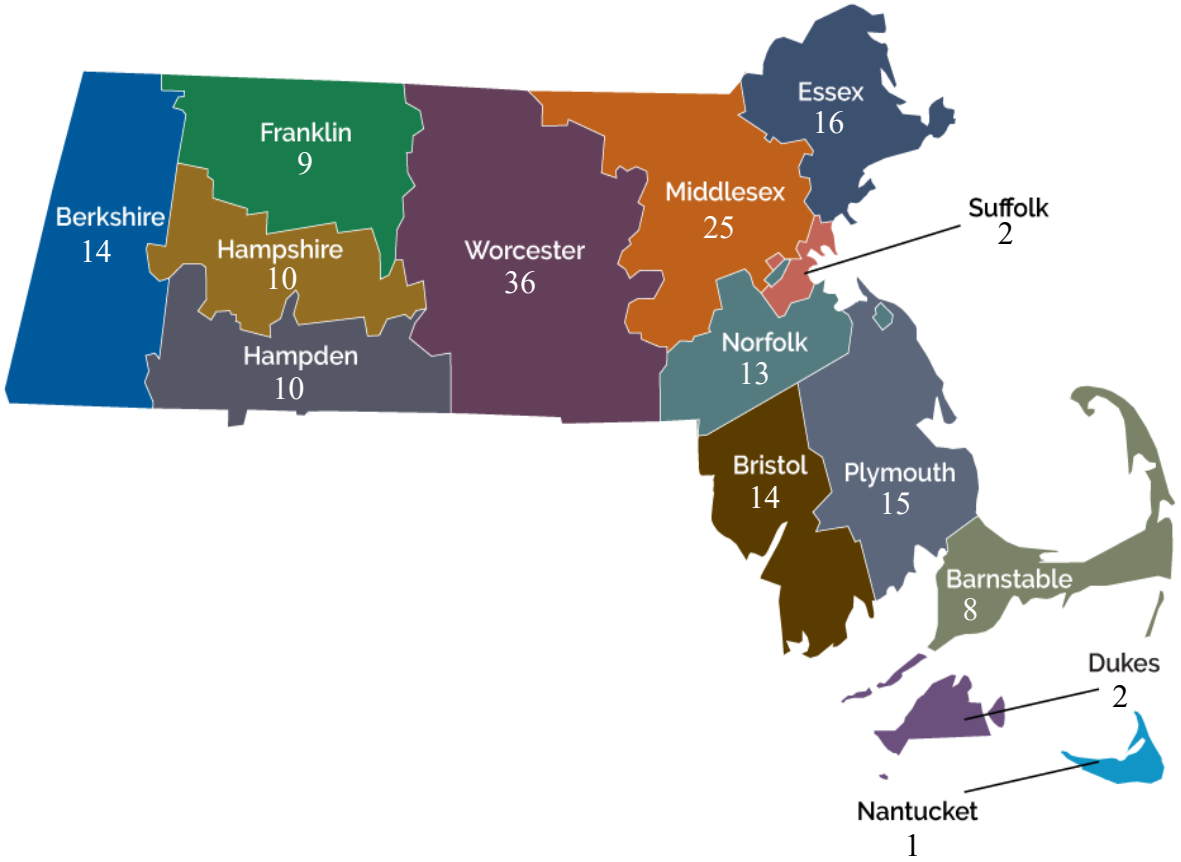
Type	#
Commence Operations (all-time, all statuses)	804
Active Commence Operations	691

*As of 8/31/26
**Does not include MMEs

Host Community Agreements Data | September 17, 2026

Overview	Total	SEP & EEA	DBE
The total number of applications received since March 1, 2024, containing an HCA	2,009	346	174
Number of Model HCAs received	514	52	49
Compliant Model HCAs	488	49	49
Number of Model HCA Waivers received	277	71	20
Compliant HCAs	1,817	315	158
Non-Compliant HCAs	102	16	13

Counties with Compliant HCAs



*As of 8/31/2026

Extension Requests Data | September 17, 2026

Extensions	Total
Extension requests received	3,127
Extension requests that received conditional pre-approval	51
Extension requests granted	2,911
Average number of days requested	86

*As of 8/31/26

Cannabis Control Commission

COMMONWEALTH OF MASSACHUSETTS

Staff Recommendations on Change of Ownership

Staff Recommendations on Change of Ownership

1. Leaf Joy, Inc.
2. Mint Retail Facilities, LLC
3. PharmaCannis Massachusetts, Inc.
4. Pharmacannis Massachusetts Inc.

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Staff Recommendations on Final Licenses

Staff Recommendations on Final Licenses

1. Apotho Therapeutics Dartmouth Manufacturing, Inc. (#MP282262), Product Manufacturer
2. Greenjeans Farms, LLC (#CO281706), Craft Cooperative – Tier 2 Outdoor
3. Hatfield Farmacy, LLC (#MC284014), Cultivator – Tier 11 Outdoor
4. Legal Greens Boston, LLC (#DOA100194), Delivery Courier
5. Legal Greens Boston, LLC (#MR285427), Retailer

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Staff Recommendations on Provisional Licenses

Staff Recommendations on Provisional Licenses

1. Middlesex Integrative Medicine (#MRN285251), Retailer

2. Wonderland Dispensary & Delivery, Inc. (#MDA1349), Delivery Operator

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Staff Recommendations on Responsible Vendor Training

Staff Recommendations on Responsible Vendor Training

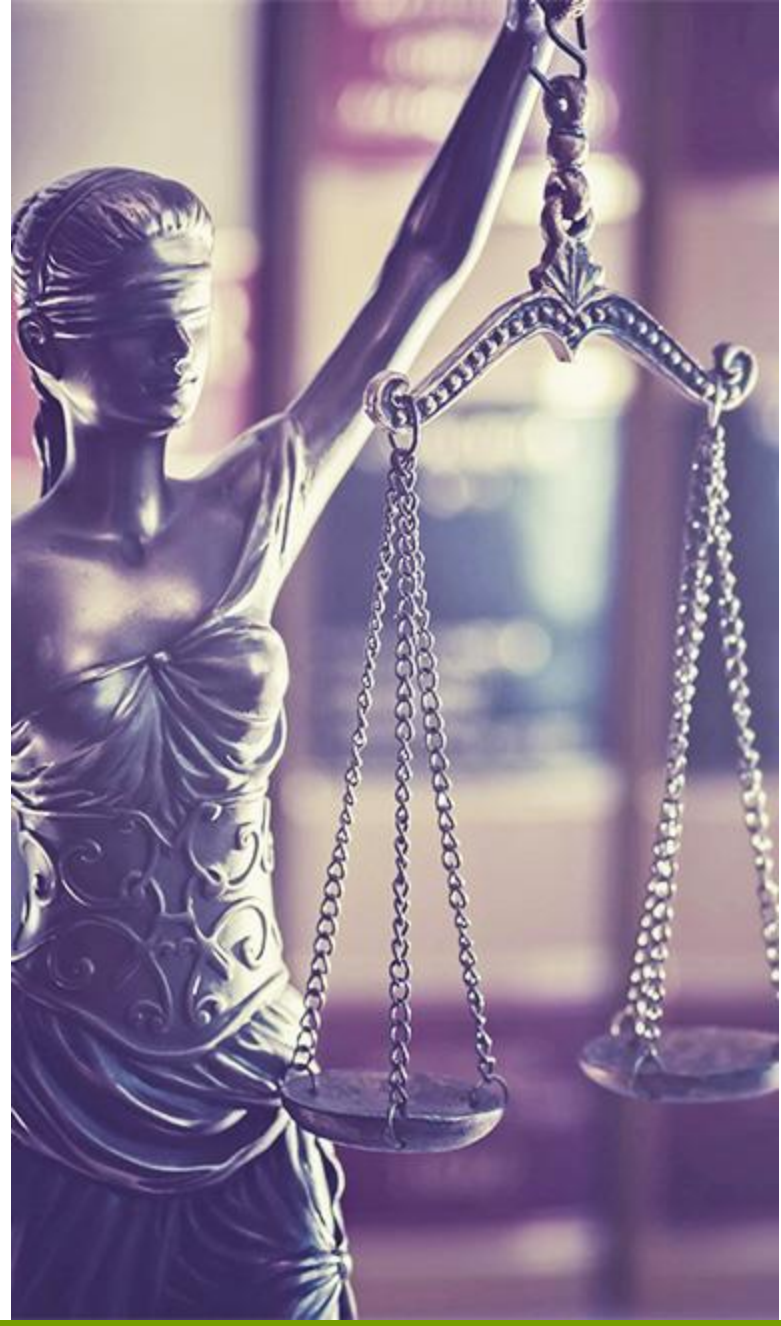
1. Driver Course Platform LLC

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Enforcement Actions

Enforcement Actions: Stipulated Agreements

1. Herbal Pathways LLC
2. Smokey Leaf LLC



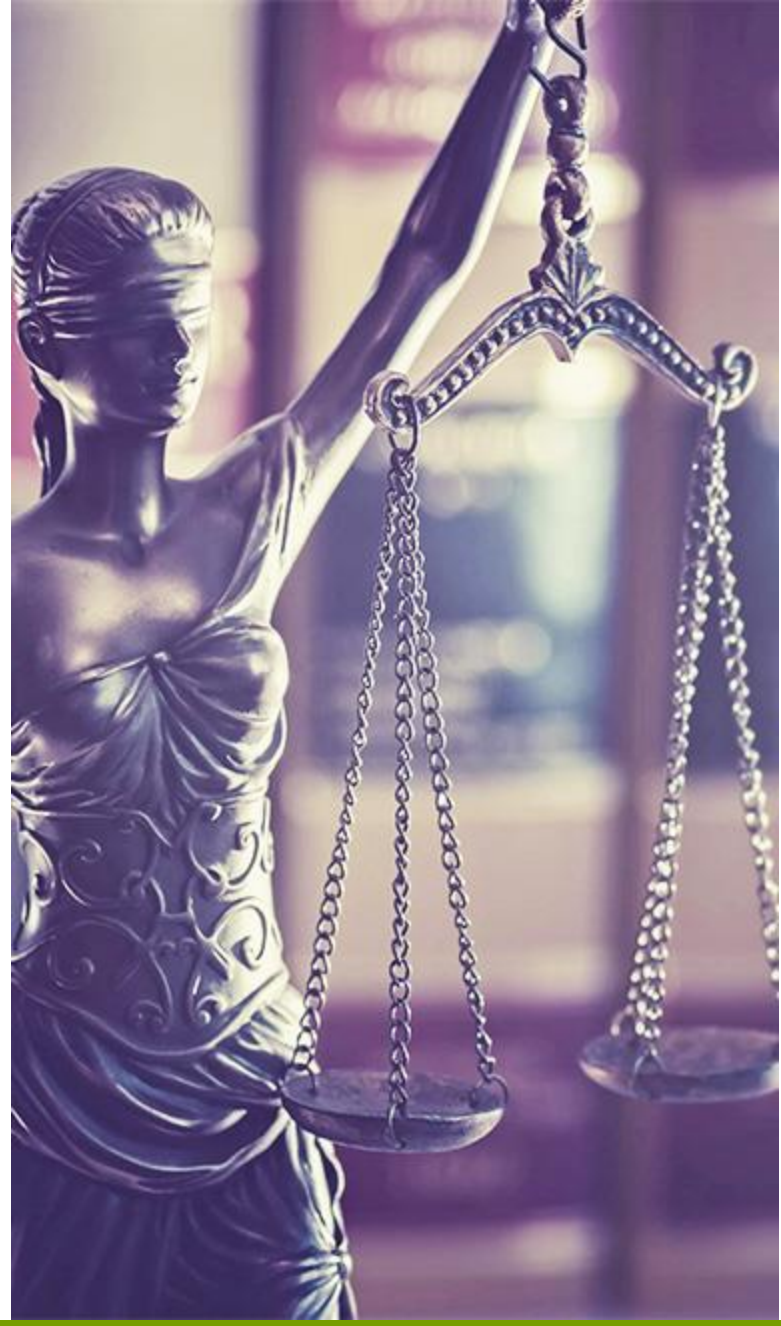
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Hearing Officer Recommended Decisions

Hearing Officer Recommended Decisions

1. Discern'd Cannabis Purveyors, Inc.



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Commission Discussion and Votes

Commission Discussion and Votes

1. Delivery of Memorandum on State-by-State Review of Cultivation Moratoria
2. Chapter 65 Fall Regulatory Round Policy Discussion



Comparison of Regional Marijuana Price Per Gram

State	July 2026 Average Price Per Gram	YTD 2026 Average Price Per Gram
Massachusetts	$3.87	$3.94
Maine	$6.08	$6.10
Connecticut	$6.88	$7.02
Rhode Island	-	$7.68
Vermont	N/A	N/A
New York	N/A	N/A
New Jersey	N/A	N/A

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Chapter 65 Fall Regulatory Round Policy Discussion

Regulatory Policy Questions

1. Whether to allow licensees the ability to permit advertising, marketing, and branding of sales, discounts and customer loyalty programs within an ME/MME or through an opt-in email list? [Chapter 65 § 21].
2. Whether to allow advertising "*within*" ME and MME's by allowing this type of communications on ME's/MME's websites? [Chapter 65 § 21].
3. Whether municipal waivers occur after the initial two-year period required by the new law. [Chapter 65 § 25].
4. Whether to allow MEs or MMEs to sell marijuana seeds? [Chapter 65 § 6].
5. Whether to limit the total number of licenses in both adult-use and medical-use programs overall? Or expressly promulgate regulations that state that the Commission may limit the total number of licenses in each license type and class. [Chapter 65 § 19].

Regulatory Policy Questions (cont'd.)

6. Whether to combine the two transporter licenses into one Marijuana Transporter License?. [Not Chapter 65 – Legal Recommendation].
7. Whether to incorporate Executive Order Number 3 into the regulations? [Not Chapter 65 – Legal Recommendation].
8. Whether to amend the annual training requirement? [Not Chapter 65 – Red Tape Removal].
9. Red Tape Removal Committee policy consideration for amendment to 935 CMR 500.310 & 501.310: *Deficiency Statements,* to allow for discretion as to whether a notice of deficiency "may" be issued as opposed to "shall" be issued to align with other enforcement actions in regulation. [Not Chapter 65 – Red Tape Removal]

Regulatory Policy Questions - Medical

10. Whether to establish a Medical Marijuana Dispensary License and FIMTC as recommended by the Medical WG. [Chapter 65 § 53].
11. Whether to allow smoking for on-site consumption for the medical program. [Not Chapter 65 – Medical WG Proposal].
12. Whether the social exclusivity period applies only to new or also existing establishments. [Chapter 65 § 61].

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Next Meeting Date

September 24, 2026

Public Meeting
Remote via Teams
10:00 am

2026 Public Meetings*
October 8
November 12
December 10

**Public Meeting dates are tentative and subject to change*

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Additional Licensing Data

Licensing Applications | September 17, 2026



*As of 8/31/26
**Does not include MMEs

Licensing Applications | September 17, 2026

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	23	N/A	0	2	18	1	14	**9**	**58**
Marijuana Courier Pre-Certification	22	131	0	N/A	N/A	N/A	N/A	**N/A**	**153**
Independent Testing Laboratory	1	N/A	0	2	2	0	16	**10**	**21**
Marijuana Cultivator	54	N/A	2	45	183	16	154	**122**	**454**
Marijuana Delivery Operator License	10	N/A	0	0	23	0	21	**16**	**54**
Marijuana Delivery Operator Pre-Certification	19	122	0	N/A	N/A	N/A	N/A	**N/A**	**141**
Marijuana Microbusiness	8	N/A	0	4	21	2	16	**12**	**51**
Marijuana Product Manufacturer	32	N/A	1	48	126	20	134	**110**	**361**
Marijuana Research Facility	6	N/A	0	1	0	1	0	**0**	**8**
Marijuana Retailer	41	N/A	2	29	107	8	440	**406**	**627**
Marijuana Transporter with Other Existing ME License	4	N/A	0	3	4	0	4	**3**	**15**
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	**0**	**8**
Third Party Transporter	17	N/A	0	0	2	0	5	**3**	**24**
Standards Laboratory	0	N/A	0	0	0	0	0	**0**	**0**
Medical Marijuana Establishment	12	N/A	0	2	1	0	94	**91**	**109**
Total	**252**	**258**	**5**	**136**	**491**	**48**	**900**	**782**	**2,090**

*As of 8/31/26

Active Cultivators | September 17, 2026

Type	Provisional License	Final License	Commence Operation	Total
Microbusiness with Tier 1 Cultivation (up to 5,000 sq. Ft.)	8	1	10	**19**
Cultivation Tier 1 (Up to 5,000 sq. ft.)	4	3	19	**26**
Cultivation Tier 2 (5,001-10,000 sq. ft.)	11	4	35	**50**
Cultivation Tier 3 (10,001-20,000 sq. ft.)	3	2	29	**34**
Cultivation Tier 4 (20,001-30,000 sq. ft.)	4	1	7	**12**
Cultivation Tier 5 (30,001-40,000 sq. ft.)	1	0	9	**10**
Cultivation Tier 6 (40,001-50,000 sq. ft.)	2	0	9	**11**
Cultivation Tier 7 (50,001-60,000 sq. ft.)	0	0	1	**1**
Cultivation Tier 8 (60,001-70,000 sq. ft.)	0	0	1	**1**
Cultivation Tier 9 (70,001-80,000 sq. ft.)	0	0	0	**0**
Cultivation Tier 10 (80,001-90,000 sq. ft.)	0	0	6	**6**
Cultivation Tier 11 (90,001-100,000 sq. ft.)	1	1	6	**8**
Total	**34**	**12**	**132**	**178**
Total Maximum Canopy (Sq. Ft.)	**590,000**	**230,000**	**3,365,000**	**4,185,000**

* 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

*As of 8/31/26

**Does not include MMEs

Active Cultivators | September 17, 2026

Type*	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	31	11	110	**152**
Marijuana Cultivator (Outdoor)	3	1	22	**26**
Total	34	12	132	**178**
Total Maximum Canopy	590,000 sq. ft.	230,000 sq. ft.	3,365,000 sq. ft.	**4,185,000 sq. ft.**
Total Minimum Canopy	365,034 sq. ft.	150,012 sq. ft.	2,365,132 sq. ft.	**2,880,178 sq. ft.**

* Includes Microbusinesses that are cultivating

Type	Provisional License	Final License	Commence Operation	Total
Expired Only (Indoor)	127	3	17	**147**
Expired Only (Outdoor)	13	1	2	**16**
Total	**140**	**4**	**19**	**163**
Total Maximum Canopy	3,375,000 sq. ft.	85,000 sq. ft.	410,000 sq. ft.	**3,870,000 sq. ft.**
Total Minimum Canopy	2,335,140 sq. ft.	55,004 sq. ft.	265,019 sq. ft.	**2,655,163 sq. ft.**
Average Number of Days Expired	925 days	886 days	654 days	**891 days**
Expired More than One (1) Year	126	4	14	**144**

As of 8/31/26
Does not include MMEs

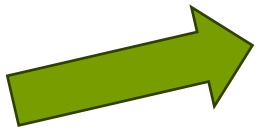
*Note: Totals under "Total Maximum Canopy" and “Total Minimum Canopy” do not reflect current canopy in use; rather the maximum or minimum that could be in use
***Between Tiers 1-3, there is a range of 4,999 sq. ft. in between tiers whereas Tiers 3-11 include a range of 9,999 sq. ft between tiers

Licensing Applications | September 17, 2026

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

The 2,014 applications represent 1,173 separate entities

Type	#
MTC Priority	265
Economic Empowerment Priority	143
Expedited Review	824
General Applicant	782
Total	**2,014**



Type	#
Expedited: License Type	92
Expedited: Social Equity Participant	451
Expedited: Disadvantaged Business Enterprise	193
Expedited: Two or More Categories	88
Total	**824**

*As of 8/31/26
**Does not include MMEs

Licensing Applications – EE & SEP | September 17, 2026

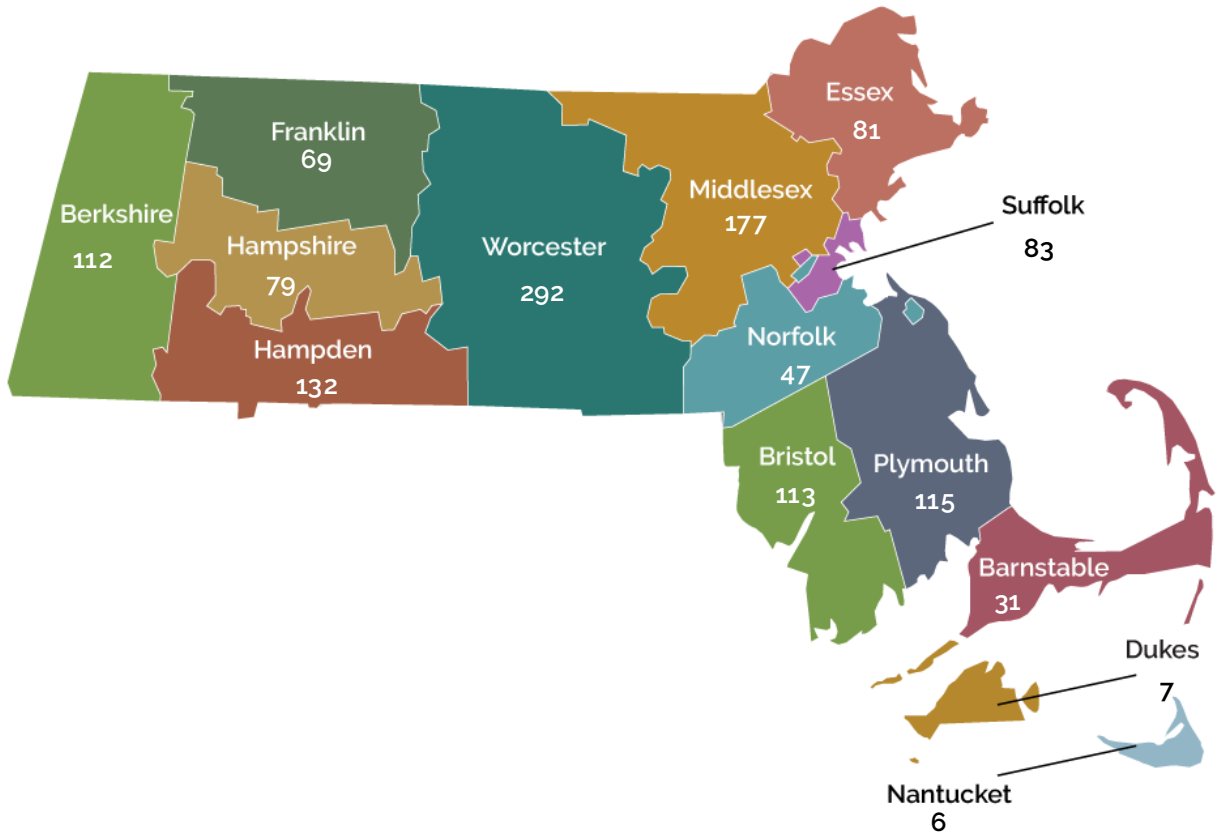
Economic Empowerment Applicants					Social Equity Program Participants			
Type	Provisional License	Final License	Commence Operation	**Total**	Provisional License	Final License	Commence Operation	**Total**
Craft Marijuana Cooperative	0	0	0	**0**	1	0	0	**1**
Marijuana Courier License	6	0	4	**10**	12	1	10	**23**
Marijuana Courier Pre-Certification	N/A	N/A	N/A	**0**	N/A	N/A	N/A	**0**
Independent Testing Laboratory	0	0	0	**0**	0	0	0	**0**
Marijuana Cultivator	7	0	0	**7**	19	0	6	**25**
Marijuana Delivery Operator License	3	0	3	**6**	19	0	17	**36**
Marijuana Delivery Operator Pre-Certification	N/A	N/A	N/A	**0**	N/A	N/A	N/A	**0**
Marijuana Microbusiness	1	0	0	**1**	7	0	3	**10**
Marijuana Product Manufacturer	3	0	3	**6**	16	2	6	**24**
Marijuana Research Facility	0	0	0	**0**	0	0	0	**0**
Marijuana Retailer	10	0	26	**36**	24	1	23	**48**
Marijuana Transporter with Other Existing ME License	1	0	0	**1**	1	0	2	**3**
Microbusiness Delivery Endorsement	0	0	0	**0**	0	0	2	**2**
Third Party Transporter	0	0	0	**0**	2	0	0	**2**
Standards Laboratory	0	0	0	**0**	0	0	0	**0**
Total	**31**	**0**	**36**	**67**	**101**	**4**	**69**	**174**

*As of 8/31/26
**Does not include MMEs

Marijuana Establishment Licenses | September 17, 2026

The totals below represent entities in each county that have achieved at least a provisional license

County	#	+/-
Barnstable	31	0
Berkshire	112	0
Bristol	113	0
Dukes	7	0
Essex	81	0
Franklin	69	0
Hampden	132	0
Hampshire	79	0
Middlesex	177	1
Nantucket	6	0
Norfolk	47	0
Plymouth	115	0
Suffolk	83	0
Worcester	292	1
Total	**1,344**	**2**

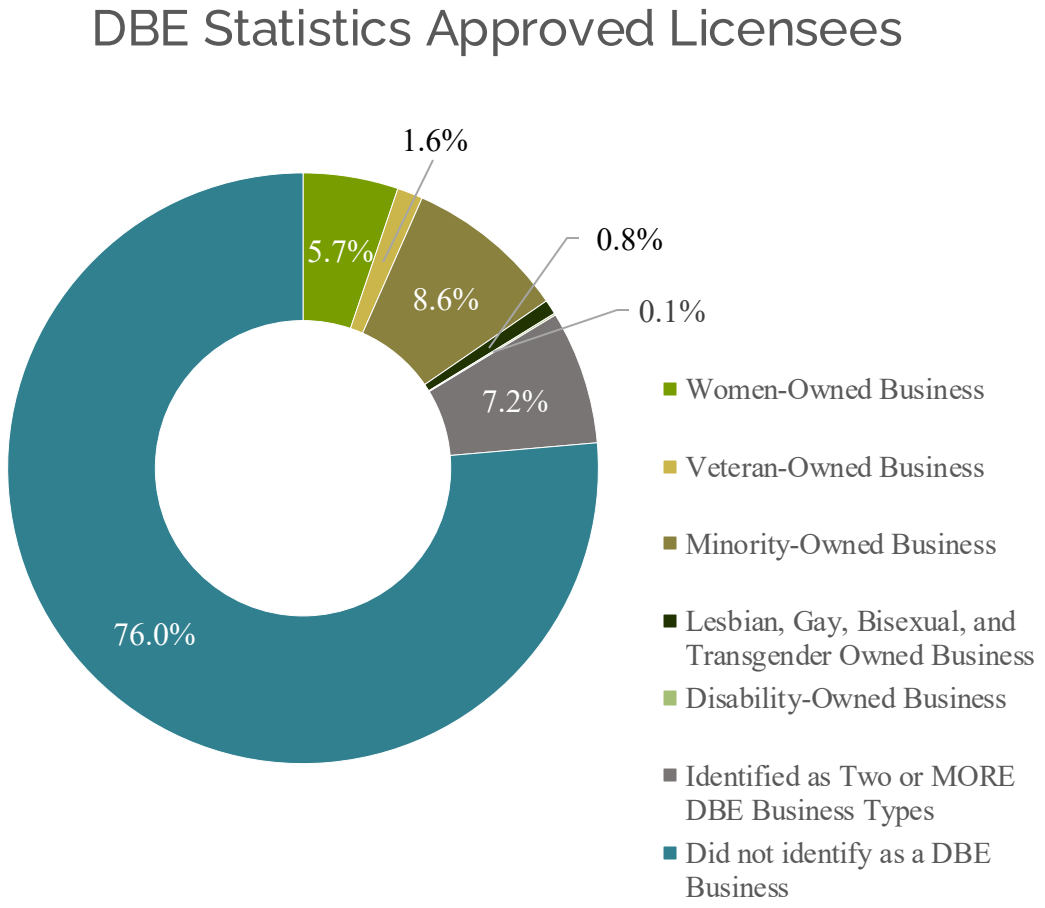


*As of 8/31/26
**Does not include MMEs

Licensing Applications | September 17, 2026

Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	98	5.7%
Veteran-Owned Business	28	1.6%
Minority-Owned Business	149	8.6%
Lesbian, Gay, Bisexual, and Transgender Owned Business	14	0.8%
Disability-Owned Business	2	0.1%
Identified as Two or MORE DBE Business Types	124	7.2%
Did not identify as a DBE Business	1,312	76.0%
Total	**1,727**	**100.0%**

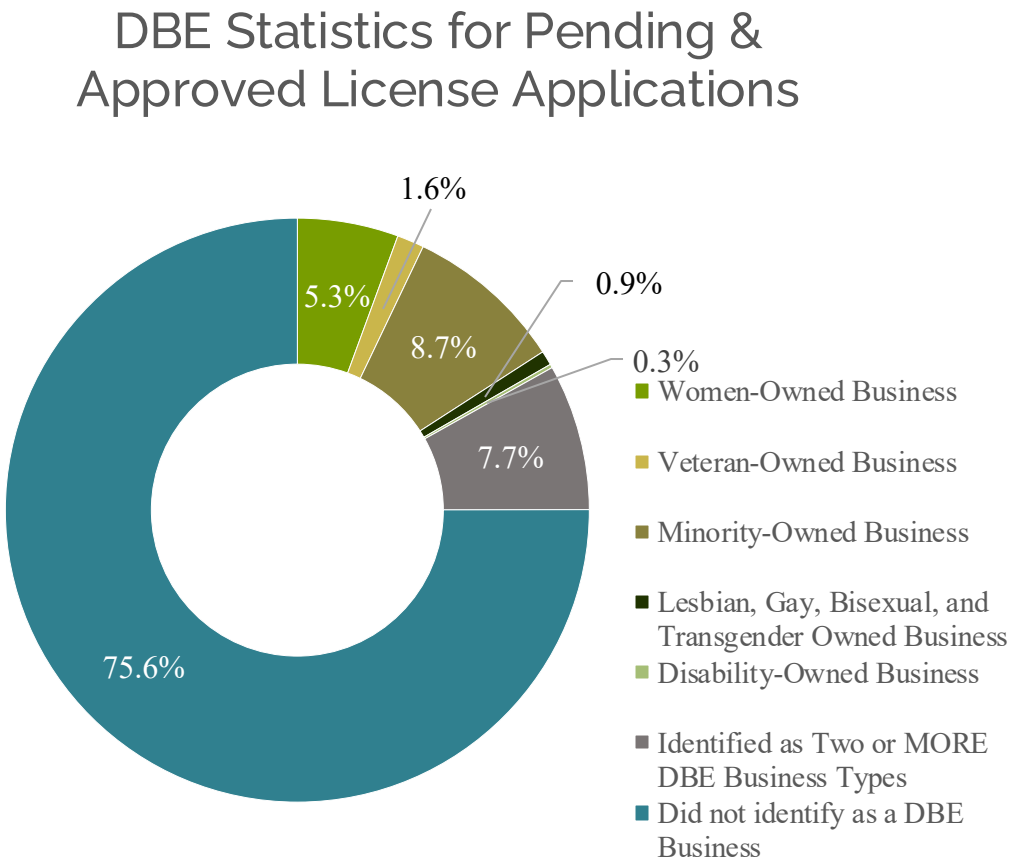


*As of 8/31/26
**Does not include MMEs

Licensing Applications | September 17, 2026

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

Type	#	% of Group
Women-Owned Business	104	5.3%
Veteran-Owned Business	32	1.6%
Minority-Owned Business	171	8.7%
Lesbian, Gay, Bisexual, and Transgender Owned Business	17	0.9%
Disability-Owned Business	5	0.3%
Identified as Two or MORE DBE Business Types	151	7.7%
Did not identify as a DBE Business	1,486	75.6%
Total	**1,966**	**100.0%**



*As of 8/31/26
**Does not include MMEs

MME Registration Data | September 17, 2026

The numbers below are a snapshot of the program as of the month of August

MME Program	#
Certified Patients	74,696
Certified Active Patients	73,558
Active Caregivers	4,980
Registered Certifying Physicians	336
Registered Certifying Nurse Practitioners	129
Registered Physician Assistants	8
Ounces Sold	93,345

*As of 9/1/26

Cannabis Control Commission

COMMONWEALTH OF MASSACHUSETTS

The Commission is in recess until 1:55