

SUMMARY OF APPLICATION

SIRA NATURALS, INC.
(MCN281252)

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name of the Marijuana Establishment and its application number:

SIRA Naturals, Inc. (MCN281252)

2. Address of the Marijuana Establishment:

13 Commercial Way, Milford, MA 01757

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

Cultivation

Tier 3—Indoor Operation (10,001 – 20,000 sq. ft)

4. Applicant is a licensee or applicant for other Marijuana Establishment license(s):

Product Manufacturer (MPN281303)

Research (REN281260)

Transporter with Other Existing ME License (MXN281310)

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

Michael Dundas—Director and Chief Executive Officer

Louis Karger—Director

David Rosenberg—Director

Robert Edelstein—Director

Eric Wardrop—Director

William Sanger—Executive/Officer

Timothy Crites—Manager

Michelle Foley—Manager

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

Green Partners Investor, LLC –50% of ownership
Green Partners Sponsor, LLC—50% of ownership

7. Priority status of applicant:

RMD Priority (RP201855)

8. Location and status of business if it is an RMD:

RMD is in compliance with the Department of Public Health (DPH).
RMD business will be co-located with the adult-use business in Milford.
RMD has Final Certificate of Registration for dispensing, cultivation and processing.

9. Information regarding host community agreement certification:

Host Community Agreement was executed on March 12, 2018; certification provided.

10. Information regarding community outreach meeting:

Community outreach meeting was held on April 10, 2018.
Notice was published at least seven days prior in the Milford Daily News.
Applicant certified notice to the municipality and abutters.
Applicant certified compliance with meeting requirements.

11. Any objections regarding compliance with local ordinances and bylaws presented by municipality:

No objections communicated to the Commission. The Commission received a response from the municipality on June 8, 2018, stating that the applicant was in compliance with all local ordinances and bylaws.

12. Summary of plan to positively impact areas of disproportionate impact:

Applicant plans to do the following:
(1) hold multi-participant education workshops and seminars;
(2) establish a preference for hiring otherwise qualified individuals from communities of disproportionate impact in proximity of Milford;

SUITABILITY REVIEW

13. Concerns arising from background checks on individuals associated with the application:

None.

14. Concerns arising from background checks on entities associated with the application:

None.

15. Applicant's disclosure of any past civil or criminal actions:

No disclosures.

16. Applicant's disclosure of any occupational license issues:

No disclosures.

17. Applicant's disclosure of any business interests in other jurisdictions:

No disclosures.

18. Status of applicant's compliance with the Department of Revenue and Secretary of the Commonwealth:

April 5, 2018 | Certificate of Good Standing, Secretary of the Commonwealth
(Certificate #: 18040128930)

April 6, 2018 | Certificate of Good Standing, Department of Revenue
(Letter ID: L0316866304)

MANAGEMENT AND OPERATIONS REVIEW

19. Applicant's proposed timeline to become operational in the adult-use market:

Applicant proposes to be operational, at full capacity, within four months from the date of the issuance of a provisional license. Applicant states they maintain a reasonable excess of inventory in current facility to ensure that patient demand is always fulfilled. Applicant intends to seek approval of any additional excess not required to meet patient demand to adult-use market.

20. Applicant's proposed hours of operation:

The applicant plans to operate 24 hours per day, seven (7) days per week.

21. Applicant's compliance with submitting summaries of the following plans, policies and procedures:

- a. Security Plan
- b. Prevention of Diversion Plan
- c. Storage of Marijuana Plan
- d. Transportation Plan
- e. Inventory Procedures
- f. Quality Control and Testing Procedures
- g. Personnel Procedures
- h. Dispensing Procedures
- i. Record-Keeping Procedures
- j. Maintenance of Financial Records Policy
- k. Diversity Plan

The applicant is fully compliant with submitting all summaries. All summaries were determined to be substantially compliant with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable. Full compliance will be reviewed during inspections and will be required before a final license is issued.

22. Summary of diversity plan:

The applicant's plan outlines its goals in promoting equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations in its operations, business partnerships, and surrounding communities. The applicant's plan includes training sessions regarding embracing diversity to achieve organizational objectives. The applicant's diversity plan is five (5) pages long.

23. Summary of cultivation plan (if applicable)

Applicant plans to increase production of existing medical marijuana supply already in existence upon approval. The applicant provided a two-page summary on its policies and procedures for cultivating marijuana.

24. Summary of products to be produced and/or sold (if applicable)

Not applicable.

25. Plan for obtaining marijuana or marijuana products (if applicable)

The applicant has an established medical marijuana supply. It plans to apply for DPH approval to transfer marijuana inventory once final license is issued in accordance with 935 CMR 500.105(8) and 935 CMR 500.140(10).

RECOMMENDATION

Commission staff recommend issuing a provisional license with the following conditions:

- (1) Final license is subject to the required individuals successfully completing a fingerprint-based check of state and national criminal history databases;
- (2) Final license is subject to certification that applicant remains in compliance with DPH regulations, 105 CMR 725.000;
- (3) Final license is subject to inspection and audit to ascertain compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable;
- (4) Final license is subject to inspection and audit to ascertain that its facilities are compliant with all applicable state and local codes, bylaws, ordinances, and regulations;
- (5) The applicant shall cooperate with and provide information to Commission investigators, agents, and employees upon request;
- (6) Provisional license subject to the payment of the appropriate license fee pursuant to 935 CMR 500.005;

This recommendation was based on the applicant's demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and upon the evaluation of the thoroughness of the applicant's responses to the required criteria.

Commission staff certify that a due diligence review of the application was performed. As of this date, the applicant has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Accordingly, the applicant is recommended for provisional licensure with the previously mentioned conditions.