

## NS AJO HOLDINGS, INC.

MCN281884

MPN281564

MRN282236

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

NS AJO Holdings, Inc.  
20 Authority Drive, Fitchburg, MA 01420

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

Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)  
Product Manufacturing  
Retail

The cultivation application was reopened four (4), the product manufacturing application was reopened more than four (4) times and the retail application was reopened four (4) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Retail	Application Submitted	Watertown
MTC	Provisional License	Fitchburg/ Watertown
MTC	Provisional License	Fitchburg/ Fitchburg
MTC	Application Submitted	Not Yet Disclosed

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

Individual	Role
Aidan O'Donovan	Owner
Isador Mitzner	Owner
Brandon Banks	Owner

Provisional License Executive Summary 1



David Clapper	Owner
William Landman	Owner
Alex Chadwick	Board Member for Natural Selections MA, Inc.
Ramon Rivera	CFO
Tyler Vines	Director of Retail Operations
Alex Hardy	COO
Robert Gorovitz	Close Associate
Morey Goldberg	Close Associate
James Aresty	Close Associate

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

Entity	Role
Natural Selections MA, Inc.	Parent Company
MLH Holdings, LLC	Entity with Direct or Indirect Authority
Linaria Investments, LLC	Entity with Direct or Indirect Authority
Lobelia Holdings, LLC	Entity with Direct or Indirect Authority
The Lavatera Trust	Entity with Direct or Indirect Authority
MLIP MLH Investments, LLC	Entity with Direct or Indirect Authority
The James Aresty 2008 Irrevocable Trust	Entity with Direct or Indirect Authority
L2015H, LLC	Entity with Direct or Indirect Authority
MLH MSO Holdco, Inc.	Entity with Direct or Indirect Authority

6. Applicant's priority status:

The applicant received, and was reviewed as, an MTC Priority Applicant as they submitted their application prior to the Commission's policy clarification on October 10, 2019. Under this policy, the applicant would still be an MTC Priority Applicant as these provisional licenses, if granted, would be co-located with an MTC.

7. The applicant and municipality executed a Host Community Agreement on June 20, 2018.
8. The applicant conducted a community outreach meeting on September 26, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on January 15, 2020 (product manufacturer) and February 13, 2020 (cultivation and retail) stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
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1	Recruit 25% of individuals from Fitchburg, allowable census tracts of Boston, Massachusetts residents who have, or have parents or spouses who have past drug convictions for its hiring initiatives.
2	Contribute a minimum of \$35,000 annually to local charities including, but not limited to, the Montachusett Opportunity Council.
3	Host semi-annual company volunteer outings with a goal of having a minimum of 10 employees per event.

**SUITABILITY 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 REVIEW**

- 13. The applicant states that it can be operational within six (6) months of receiving its provisional license(s).
- 14. The applicant’s proposed hours of operation are the following:  
  
Monday – Sunday: 8:00 a.m. – 8:00 p.m.
- 15. The applicant submitted all applicable and 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.
- 16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Increase the number of minorities, women, veterans, people with disabilities, and LGBTQ+ by 10% or a minimum of 1 job, whichever is greater.
2	Offer advancement to management and executive positions internally to provide opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement.
3	Ensure employees receive training on diversity and sensitivity.

- 17. Summary of cultivation plan (if applicable):



The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission’s regulations.

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

#	Product
1	Dark and Milk Chocolate bars
2	Sour Raspberry Gummies
3	Milk Chocolate Drops
4	Mint Flavored Lozenges
5	Lemon Flavored Lozenges
6	Salted Caramels
7	Topicals
8	Lotions
9	Salves
10	Oils
11	Sprays
12	Waxes
13	Shatter
14	Vape Oil
15	Tinctures
16	Kief
17	Pre-Rolled Cannabis Joints

19. Plan for obtaining marijuana or marijuana products (if applicable):

NS AJO Holdings, Inc. plans to obtain marijuana from its affiliated licenses.

**RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors; and
6. Final licensure is subject to the applicant providing Commission staff, upon inspection, with an updated timeline as to when its MTC licenses will become operational.



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

