

SIRA NATURAL, INC.
MCN282015

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Sira Natural, Inc.
One Industrial Road, Milford, MA 01757

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

Cultivation – Tier 3 / Indoor (10,001 to 20,000 sq.ft)

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

Cultivation - Tier 3—Indoor Operation (10,001 – 20,000 sq. ft)
Product Manufacturer
Transporter with Other Existing ME License
(All three (3) have a final license in Milford)

4. 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
Thomas Plunket — Manager
Michelle Foley—Manager
Jonathan Sandelman - Director
Jennifer Drake – Chief Operating Officer
Mark Smith – Treasurer
Charles Miles - Director
Steve Menzies - Director
Mark Pitchford - Director
Chris Burggraeve - Director
Carmelo Marrelli – Chief Financial Officer



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

CSAC Acquisition, Inc. — Owner of Sira Naturals, Inc.

CSAC Holdings, Inc. — Holder of 100% of the voting control and majority ownership in CSAC Acquisition, Inc.

Cannabis Strategies Acquisition Corp. (CSAC) — Holder of 100% of the control and equity of CSAC Holdings, Inc.

Mercer Park CB, L.P. — Holder of 10% of CSAC ownership and 63% of CSAC voting interest.

Mercer Park CB GP, LLC — Sole general partner of Mercer Park CB, L.P.

6. Applicant's priority status and information pertaining to co-located operations:

MTC Priority (RP201855)

MTC has Final Certificate of Registration for dispensing, cultivation and processing. This adult-use establishment will not be co-located with an MTC.

7. The applicant and municipality executed a Host Community Agreement on September 10, 2018.

8. The applicant conducted a community outreach meeting on October 4, 2018 and provided documentation demonstrating compliance with Commission regulations.

9. The Commission received a municipal response from the municipality on April 17, 2019 stating the applicant was in compliance with all local ordinances and bylaws.

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

- a. Give priority status to Social Equity and Economic Empowerment participants in the Sira Accelerator program, which is a small business advisory program.

SUITABILITY REVIEW

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

12. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.



MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within four (4) months of receiving its provisional license.
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day
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 programs for its Diversity Plan:
 - a. Recruit a diverse workforce; and
 - b. Implement retention strategies through the utilization of education, training, and counseling.
17. Summary of cultivation plan (if applicable):

The applicant submitted a detailed cultivation plan that demonstrated the ability to comply with the Commission's regulations.
18. Summary of products to be produced and/or sold (if applicable):

Not applicable.
19. Plan for obtaining marijuana or marijuana products (if applicable):

Not applicable.
20. ISO 17025 Certifying Body and Certificate Number (if applicable):

Not applicable.

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; and



5. Final license is subject to the applicant providing Commission staff with demonstrable proof of compliance with all advertising regulations contained within 935 CMR 500.000 as they apply generally to the establishment and to any program instituted by the licensee.

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.

