

SIRA NATURALS, INC.

(MPN281303)

BACKGROUND & APPLICATION OF INTENT REVIEW

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

SIRA Naturals, Inc. (MPN281303)

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):

Product Manufacturer

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

Transporter with Other Existing ME License (MXN281310)
Research (REN281260)
Cultivation (MCN281252)

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 19, 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 the transfer of any 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)

Not applicable.

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

Sira Naturals' products fall into two categories: (1) concentrates and (2) infusions. Concentrates will consist of cannabis oil, vape cartridges, shatter, wax, rosin, bubble hash, and kief. Infusions will consist of caramels, honey, sugar, brownies, lozenges, tinctures, beverages, cookies, chocolates, candy chew, gummy, lotion, and salves.

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 subject to the following ongoing conditions:

- (1) All required individuals shall successfully complete a fingerprint-based check of state and national criminal history databases, and as applicable, another review of its suitability;
- (2) The applicant shall provide certification that it remains in compliance with DPH regulations, 105 CMR 725.000;
- (3) The applicant shall be 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) The applicant shall be 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) The applicant shall pay the appropriate license fee pursuant to 935 CMR 500.005; and
- (7) The applicant shall demonstrate that it has otherwise complied with the statutory and regulatory requirements for final licensure.

This recommendation is based on the applicant's demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and 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 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.