

PATRIOT CARE CORP.
(MRN281283)

BACKGROUND & APPLICATION OF INTENT REVIEW

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

Patriot Care Corp. (MRN281283)

2. Address of the Marijuana Establishment:

70 Industrial Avenue East, Lowell, MA, 01852

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

Retailer

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

Cultivation (MCN281265)
Retailer (MRN281282)
Product Manufacturer (MPN281308)

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

Robert Mayerson—Executive
Nicholas Vita—Executive
Michael Abbott—Executive
George Agganis—Executive
Mary-Alice Miller—Executive
David Hart—Executive
David Catanzano—Director

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

Columbia Care, LLC is the parent company of Patriot Care Corp.

7. Priority status of applicant:

RMD Priority (RP201838)

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

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

9. Information regarding host community agreement certification:

The Host Community Agreement was executed on April 13, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on May 30, 2018.
Notice was published at least seven days prior in the Lowell Sun.
The applicant certified notice to the municipality and abutters.
The applicant certified compliance with the community outreach meeting requirements.

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

No objections were communicated to the Commission. The Commission received a response from the municipality on August 1, 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:

The applicant plans to do the following:

- i. Continue to hire individuals specifically from disproportionate areas such as Greenfield and Lowell;
- ii. Develop apprenticeship and educational programs for individuals living in disproportionately impacted areas who are interested in the marijuana industry. The applicant expects this program to be operational by the fall of 2018.

SUITABILITY REVIEW

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

No concerns.

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

No concerns.

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

There were disclosures, however, none of the disclosures presented suitability issues.

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

No disclosures.

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

Columbia Care, LLC disclosed marijuana-related business interests in the following jurisdictions:

- i. Arizona;
- ii. Delaware;
- iii. Illinois;
- iv. Maryland;
- v. New York;
- vi. Ohio;
- vii. Pennsylvania;
- viii. Puerto Rico; and
- ix. Washington D.C.

None of the disclosures presented suitability issues.

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

April 13, 2018 | Certificate of Good Standing, Secretary of the Commonwealth
(Certificate Number: 18040284810)

April 3, 2018 | Certificate of Good Standing, Department of Revenue
(Letter ID: L0007696512)

MANAGEMENT AND OPERATIONS REVIEW

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

The applicant is a vertically-integrated RMD. The applicant states that it can be operational in the adult-use market upon being granted a final license.

20. Applicant's proposed hours of operation:

Monday-Friday: 10:00 a.m. to 8:00 p.m.

Saturday-Sunday: 11:00 a.m. to 6:00 p.m.

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 plans to effectuate its goal of providing equitable opportunities throughout its operation by doing the following:

- i. Engage with vocational schools, community colleges, veteran re-entry programs, and advocacy groups to educate disenfranchised individuals about its operation and possible employment opportunities;
- ii. Adopt organizational policies that mandate fairness and equity;
- iii. Offer mentoring programs for disadvantaged employees;
- iv. Provide career guidance and planning programs; and
- v. Implement a non-discriminatory merit-based performance appraisal system.

23. Summary of cultivation plan (if applicable):

Not applicable.

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 is a vertically-integrated RMD that is currently operational. It has applied for adult-use cultivation and product manufacturing licenses and plans to be self-sufficient in regard to obtaining marijuana for its retail establishments.

26. ISO 17025 Certifying Body and Certificate Number (if applicable):

Not applicable.

RECOMMENDATION

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

- (1) Final license is subject to certification that applicant remains in compliance with DPH regulations, 105 CMR 725.000;
- (2) 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;
- (3) 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;

- (4) The applicant shall cooperate with and provide information to Commission investigators, agents, and employees upon request; and
- (5) 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.