

COMMONWEALTH CULTIVATION INC.
MCN281457

BACKGROUND & APPLICATION OF INTENT REVIEW

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

Commonwealth Cultivation Inc.

2. Address of the Marijuana Establishment:

74 Downing Parkway, Pittsfield, MA 01201

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

Cultivation—Tier 2/Indoor (5,001 to 10,000 sq. ft.)

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

The applicant is not a licensee or applicant for any other Marijuana Establishment license.

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

Brian Vincent—Chief Executive Officer/Director
Andrew Vincent—Chief Financial Officer/Director
Christopher Brock—Chief Operating Officer
George Whaling—Close Associate
Paul Aronofsky—Close Associate
Will Omeara—Close Associate
Anastacia Bacca—Close Associate

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

Associated Security Company—Security Firm

7. Priority status of applicant:

General Applicant

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

Not applicable.

9. Information regarding host community agreement certification:

The Host Community Agreement was executed on May 24, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on May 12 2018.
Notice was published at least seven days prior in The Berkshire Eagle.
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 September 26, 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 take the following actions:

- a. Conspicuously post and advertise positions in local newspapers for positions that will attract individuals from Pittsfield, specifically, minorities and women; and
- b. Implement a company-wide volunteer program aimed at encouraging individuals to participate in civic organizations and municipal projects pertaining to job placement, housing initiatives, and veteran programs.

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:

No disclosures that raised suitability issues.

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

No disclosures that raised suitability issues.

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:

June 8, 2018 | Certificate of Good Standing, Secretary of the Commonwealth
(Certification Number: 18060167830)

June 12, 2018 | Certificate of Good Standing, Department of Revenue
(Letter ID: L1028224128)

MANAGEMENT AND OPERATIONS REVIEW

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

The applicant will need to perform modifications to its facility once approved for a provisional license. The applicant estimates that operations could begin by February 1, 2019.

20. Applicant's proposed hours of operation:

Monday-Sunday: 7:00 a.m. to 7:00 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 hire a diverse workforce that reflects the age, education, racial, cultural, religious, and sexual orientation demographics of the Berkshire region and Massachusetts as a whole.

The applicant will do the following to accomplish its goal:

- a. Job and training opportunities will be distributed through community contacts, public service groups, radio and media outlets, and minority business and veteran associations; and
- b. Foster relationships with the local veteran associations to ensure linking veterans with possible employment opportunities.

The applicant will conduct regular audits and draft reports on the success of its plan.

23. Summary of cultivation plan (if applicable):

The applicant submitted a comprehensive plan that systematically explained the various stages of cultivation. Specific information that was provided include the following:

- a. Growing practices;
- b. Specific dimensions of the projected final version of the cultivation operation once renovations are completed;
- c. Environmental controls;
- d. Cultivation training;
- e. Pest Management;
- f. Record-keeping; and
- g. Irrigation.

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

Not applicable.

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

Not applicable.

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 inspection and audit to ascertain compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable;
- (2) 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;
- (3) The applicant shall cooperate with and provide information to Commission investigators, agents, and employees upon request; and
- (4) 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.