

CURALEAF MASSACHUSETTS, INC.
MCN281309
MPN281318

BACKGROUND & APPLICATION OF INTENT REVIEW

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

Curaleaf Massachusetts, Inc.

2. Address of the Marijuana Establishment:

30 Worcester Road, Unit B, Webster, MA 01570

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

Cultivation—Tier 11/Indoor (90,001-100,000 sq. ft)
Product Manufacturer

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

Retailer (MRN281263)

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

Patrik Jonsson—Executive
Margot Blair—Manager
Maura O'Brien—Manager
Gary Stein—Director
Diane Albernaz—Director
Devin Earl—Executive
Peter Clateman—Board Member
Christine Rigby—Board Member
Joseph Lusardi—Board Member

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

PalliaTech MA, Inc.—Investor Company
PT Mass Holdings, LLC –Minority Shareholder

7. Priority status of applicant:

RMD Priority (RP201882)

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 Webster.
The RMD has a Final Certificate of Registration for dispensing, cultivation, and processing.

9. Information regarding host community agreement certification:

The Host Community Agreement was executed on April 5, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on March 19, 2018.
Notice was published at least seven days prior in the Telegram and Gazette.
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 two response from the municipality on July 24, 2018, stating that the applicant was in compliance with all local ordinances and bylaws for both applications.

12. Summary of plan to positively impact areas of disproportionate impact:

The applicant plans to take the following actions:

- a. Give priority status to individuals from areas of disproportionate impact that are close in proximity to Webster and Oxford, such as Worcester;
- b. Hold educational events in Worcester that focus on cannabis education, cultivation, and topics that the community could benefit from; and
- c. Organize local fundraisers that will help charities and non-profits in Worcester.

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.

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:

April 2, 2018 | Certificate of Good Standing, Secretary of the Commonwealth
(Certification Number: 18040027020)

April 3, 2018 | Certificate of Good Standing, Department of Revenue
(Letter ID: L0481603712)

MANAGEMENT AND OPERATIONS REVIEW

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

The applicant operates a vertically-integrated RMD and states that it can be operational in the adult-use market once it is approved for licensure.

20. Applicant's proposed hours of operation:

Monday-Sunday: 7:30 a.m. to 4:00 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 has established a three-year goal to expand opportunities to women, minorities, veterans, and disabled individuals.

The applicant plans to do the following to accomplish its goals:

- a. Advertise open employment positions to publications directed to minorities, women, veterans, and persons with disabilities;
- b. Partner with local Chambers of Commerce and community organizations for the purpose of finding and contracting with diverse vendors and businesses;
- c. Actively recruit at colleges and universities with predominantly minority or female enrollments; and
- a. Request that employment agencies refer qualified minorities and women.

The applicant will draft quarterly reports pertaining to its equal opportunity progress and identify potential areas for improvement.

23. Summary of cultivation plan (if applicable):

The applicant's cultivation plan summarizes best practices that will be utilized and demonstrates that the applicant will be compliant with the regulatory requirements.

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

The applicant plans to produce the following:

- a. Tinctures;
- b. Portable vaporizer cartridges; and
- c. Edibles.

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 provisional licenses 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 applications were 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.