I.N.S.A., INC.
MC281268
MP281426
MR281680

ESTABLISHMENT OVERVIEW

1. Name of the Marijuana Establishment:
   I.N.S.A., Inc.

2. Address of the Marijuana Establishment:
   122 Pleasant Street, Easthampton, MA 01027

3. Type of final license(s) sought (if cultivation, its tier level and outside/inside operation):
   Cultivation, Tier 7/Indoor Operation (50,001 to 60,000 sq. ft)
   Product Manufacturer
   Retailer

LICENSING OVERVIEW

4. The licensee was granted provisional licenses by the Commission for all Marijuana Establishment license types listed above on August 9, 2018.

5. The licensee has paid all applicable license fees.

6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.

7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional licenses.

INSPECTION OVERVIEW

8. The initial inspection took place at the facility on October 2, 2018.
9. The licensee’s Marijuana Establishment was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.

10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishments were not in compliance with all applicable state and local codes, bylaws, ordinances, and regulations.

11. Specific information from Commission staff’s inspection is highlighted below:

   a. Security

   All persons arriving at the establishment must enter through a door at the rear of the building. Persons arriving must display an identification card to the camera at the door, after which, they are buzzed into the building. All persons entering are greeted by a receptionist, who further inspects the identification and ensures that the person is 21 years old or older. Persons with valid patient identification cards are allowed to enter the establishment. All other visitors must sign a visitor log and are issued a visitor badge. Doors in the reception area are locked and are posted with limited access area signs.

   With the exception of the reception area, all other areas of the building are limited access areas. All doors were locked and could only be opened with a RFID key card. All doors had appropriate signage indicating they are limited access areas.

   The establishment is equipped with panic alarms that are wired directly to the Easthampton Police Department. The establishment has two security companies.

   Enforcement staff inspected the cameras and monitors on site at the establishment. All exits, entrances, and areas containing marijuana are covered by camera surveillance. The camera system produces high-quality images. Enforcement staff tested the system and ensured that time and date stamps are accurate, that clear video images are displayed in real time, and that a still photo can be printed from a video file.

   The establishment’s security systems are able to remain operational during a power outage. A diesel-powered generator provides backup power to the establishment and its security systems in the event of a power failure.

   b. Inventory and Storage

   The rooms where marijuana products are stored were clean with no visible evidence of infestation. The establishment produces all of its products in its inventory. A representative of the establishment verified that they will reserve at least 35% of its inventory for patients.
c. **Cultivation Operation**

The cultivation area at the establishment is divided into ten (10) rooms: one (1) mother/clone room, two (2) vegetative rooms, and seven (7) flowering rooms. Enforcement staff measured the actual canopy of the establishment which is as follows:

<table>
<thead>
<tr>
<th>Room Type</th>
<th>Canopy (sq. ft.)</th>
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</thead>
<tbody>
<tr>
<td>Clone/Mother Room</td>
<td>840 sq. ft.</td>
</tr>
<tr>
<td>Vegetative Room(s)</td>
<td>1,680 sq. ft.</td>
</tr>
<tr>
<td>Flowering Room(s)</td>
<td>6,024 sq. ft.</td>
</tr>
<tr>
<td><strong>TOTAL CANOPY</strong></td>
<td><strong>8,544 sq. ft.</strong></td>
</tr>
</tbody>
</table>

The establishment has been issued a Tier 7 provisional cultivation license (50,001 - 60,000 sq. ft.). The total canopy in the facility currently falls under this tier. As no marijuana is stored in the facility for adult-use operations, the total canopy was counted. The third story of the building will be used to expand their cultivation space. This expansion has been approved by DPH.

d. **Product Manufacturing Operation**

The product manufacture area is a commercial kitchen that manufactures edible products that include hard candies, gummies, chocolate bars, and beverages. Enforcement staff verified that the kitchen manager had received food safety training and was properly certified. The kitchen area was very clean and in compliance with all applicable sections of the Commission’s regulations.

The establishment uses a butane extraction process to extract oil from cannabis. The apparatus is permitted by the Easthampton Fire Department.

e. **Retail Operation (if applicable)**

As persons enter the sales area, a retractable belt-barrier guides them to a sales counter where they are greeted by a customer sales representative who guides them appropriately. The sales floor is properly separated for adult-use and medical-use sales. The establishment is in the process of obtaining hand-held scanners to verify the authenticity of identification cards.

Enforcement staff reviewed the establishment’s consumer education material that was in the form of a booklet. The information inside the booklet contains all the required information. The sales area also has a separate consultation room that is a private and situated away from the sales floor.

f. **Transportation**

The establishment has one transportation vehicle that is registered in Massachusetts. The vehicle does not have any lettering or markings on its exterior. The vehicle is equipped with cameras and GPS tracking. Enforcement staff inspected the vehicle, logs, manifests, policies, and procedures, and found all to be in compliance with the Commission’s regulations.
RECOMMENDATION

Commission staff recommends issuing final licenses for the above Marijuana Establishments with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee 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. The licensee remains suitable for licensure pursuant to 935 CMR 500.102(1)(a)(2);
4. The licensee shall cooperate with and provide information to Commission investigators, agents, and employees upon request; and
5. The licensee shall demonstrate that it is in compliance with or has obtained applicable waivers or approvals from the Department of Public Health, as necessary, and provide documents as the Commission may request prior to commencing operations.

This recommendation was based on the licensee’s demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and upon the inspection(s) of the licensee’s Marijuana Establishments.

Commission staff certify that a due diligence review of the licensee’s Marijuana Establishments were performed. As of this date, the licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Accordingly, the licensee is recommended for final licensure for the Marijuana Establishments with the previously mentioned conditions.

As part of the approval of these final licenses, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.