

NEW ENGLAND TREATMENT ACCESS, LLC

MC281267

MP281306

ESTABLISHMENT OVERVIEW

1. Name of the Marijuana Establishment:

New England Treatment Access, LLC

2. Address of the Marijuana Establishment:

5 Forge Parkway, Franklin, MA 02038

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

Cultivation, Tier 6—Indoor Operation (40,001 – 50,000 sq. ft)
Product Manufacturer

LICENSING OVERVIEW

4. The licensee was granted provisional licenses by the Commission for both Marijuana Establishments license types on July 26, 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 licenses.
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 11, 2018.

9. The licensee's Marijuana Establishments were 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 Marijuana Establishment must enter through the front entrance, where they must be granted access into the lobby by security personnel. Security personnel are available at all times for clearance through the front entrance. Once security allows access electronically through the doorway, persons may not proceed further into the establishment without using a radio-frequency identification ("RFID") access card. The public is not allowed beyond the reception room as the rest of the building is a limited access area. A visitor log is maintained for all outside vendors. Visitors are escorted at all times by the Marijuana Establishment's employees. All visitors are required to wear badges.

All doors were locked and could only be unlocked with a RFID card. RFID cards ensure employees have access to areas specific to their line of work. The establishment has a primary and secondary security system. All alarms are inspected and tested monthly. The alarm system includes glass break detectors that send a signal to the Franklin Police Department when activated. The establishment is equipped with panic alarms that are worn by security staff and are wired directly to the Franklin Police Department. Surveillance video recordings are kept on redundant arrays of independent disks ("RAID"), which allow for immediate available video storage in event of a disc failure or damage. The establishment has a 90-day retention and 24-hour surveillance coverage. The camera system produces high quality images. Enforcement staff tested the camera system and ensured time and date stamps were accurate, clear video images were displayed in real time, and a still photo may be printed from a video file. The facility can remain fully operational during a power outage.

- b. Inventory and Storage

All areas of marijuana storage were clean with no visible evidence of pests. The establishment conducts weekly "cycle checks" to make sure there are no discrepancies. A count of every box is completed annually as a comprehensive inventory check. The establishment monitors inventory of all locations by using their current inventory database.

- c. Cultivation Operation (if applicable)

The cultivation area was divided into one (1) mother room, five (5) vegetative rooms, 17 flowering rooms, and three (3) empty rooms. The establishment tentatively plans for future grow room expansions, but no formal proposal has been made. Enforcement staff measured the actual canopy of the facility which is as follows:

Mother Rooms (1)	72 sq. ft.
Flowering Rooms (17)	13,999 sq. ft.
Vegetative Rooms (5)	5,140 sq. ft.
Empty Rooms (3)	1,593 sq. ft.
TOTAL CANOPY	20,804 sq. ft.

The establishment has been issued a provisional Tier 6 cultivation license (40,001 sq. ft. – 50,000 sq. ft.). The total canopy is currently less square feet than what the tier allows. As no marijuana is stored in the facility currently for adult-use operations, the total canopy was counted.

d. Product Manufacturing Operation (if applicable)

The product manufacture area is a commercial kitchen that manufactures edible products which were indicated in the product manufacturing license application. The establishment produces all their products and does not obtain products from any outside companies.

The kitchen manager is ServSafe certified and makes sure the kitchen is organized. There were no visible signs of infestation. Perishable items were stored, handled and prepared according to the food regulation code 105 CMR 590. The kitchen area was very clean and in compliance with Commission regulations.

e. Retail Operation (if applicable)

Not applicable.

f. Transportation

The Marijuana Establishment has four registered unmarked vehicles. Vehicles are operated by the establishment’s employees to pick up and transport all marijuana from its Franklin location to its retail establishments, and to Independent Testing Laboratories. All vehicles are monitored by GPS tracking. Additionally, each driver has a body camera for additional footage. The transportation vehicles have steel cages that are bolted inside the rear. There are five cameras in each vehicle. The cameras inside the vehicles ensure at least one agent remains in the vehicle at all times while marijuana products are present. Marijuana products are stored in locked Pelican cases and kept out of sight by tinted windows. All transportation vehicles, policies, logs, and manifest comply with 935 CMR 500.105(13).

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 sell, or otherwise transport marijuana to other Marijuana Establishments, 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.