

## SANCTUARY MEDICINALS, INC.

MCN281308

MPN281405

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

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

Sanctuary Medicinals, Inc.

2. Address of the Marijuana Establishment:

234 Taylor Street, Littleton, MA 01460

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

Cultivation, Tier 5—Indoor (30,001-40,000 sq. ft)  
Product Manufacturer

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

Retail (MRN281650)

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

Michael Wilmoth—Director  
David Syrek—Director  
Jason Sidman—Executive  
Michael Allen—Close Associate  
Nicholas Satmary—Close Associate  
Joshua Weaver—Close Associate  
James Alex—Close Associate

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

Premier Healthcare Group, LLC is the applicant's investment entity. PHG, LLC is the applicant's managing entity.

7. Priority status of applicant:

RMD Priority (RP201958)

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 Littleton.  
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 June 27, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on May 2, 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 October 11, 2018, stating that the applicant was in compliance with all local ordinances and bylaws for both license types.

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

The applicant plans to do the following:

- a. Conducting industry-specific educational seminars in one or more of the following: marijuana cultivation, marijuana product manufacturing, marijuana retailing, or marijuana business training;
- b. Donations to the Social Equity Training and Technical Assistance Fund;
- c. Providing financial mentoring services or hosting organizations that provide these services;
- d. Holding monthly informational sessions regarding the process for sealing and expunging criminal records;
- e. Partnering with and supporting organizations that provide jail diversion and restorative justice programs;
- f. Instituting hiring practices that prioritize the hiring of individuals from disproportionate areas; and
- g. Having in-store donation drives, including direct giving and ongoing food and clothing drives.

**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.

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

Jason Sidman and Joshua Weaver disclosed that they both have an interest in a marijuana business in New Hampshire.

None of the disclosures presented suitability issues.

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

July 5, 2018 | Certificate of Good Standing, Secretary of the Commonwealth  
(Certification Number: 18070076120)

April 7, 2018 | Certificate of Good Standing, Department of Revenue  
(Letter ID: L0302370944)

## **MANAGEMENT AND OPERATIONS REVIEW**

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

The applicant states that an architectural changes will need to be made to the facility prior to commencing operations. The applicant states that it can be begin operations approximately six months after being issued a provisional license.

20. Applicant's proposed hours of operation:

Monday-Sunday: 8:00 a.m. to 8:00 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 do the following:

- a. Host career fairs in underrepresented and minority communities;
- b. Specifically use suppliers who are committed to diversity and inclusion;
- c. Provide training on recognizing unconscious bias;
- d. Develop relationships with organizations serving minorities, women, people of all gender identities and sexual orientations, veterans, and persons with disabilities for employment referrals; and
- e. Establish recruitment efforts at higher learning institutions, and institutions with programs that reach diverse people.

The applicant plans to produce quarterly internal reports on its diversity initiatives.

23. Summary of cultivation plan (if applicable):

The applicant provided a detailed summary of its cultivation plan and provided information on the following areas:

- a. Facility layout;
- b. Best practices;
- c. Irrigation;
- d. Pest control prevention;
- e. Sanitation;
- f. Quality control and monitoring; and
- g. Testing.

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

Products to be produced include the following:

- a. Dissolving tablets and strips;
- b. Tinctures;
- c. Nasal/Oral spray;
- d. Oil;
- e. Wax;
- f. Shatter;
- g. Butter;
- h. Resin;
- i. Taffy;
- j. Crumbles;

- k. Cream;
- l. Salves;
- m. Lotions;
- n. Body butters;
- o. Topicals;
- p. Dermal patches;
- q. Capsules;
- r. Beverages;
- s. Sauces;
- t. Dips;
- u. Baked goods;
- v. Chocolates;
- w. Candies;
- x. Mints;
- y. Teas; and
- z. Sugars

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 the 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 the 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 is 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.