

ALTERNATIVE THERAPIES GROUP, INC.

MC281255

MP281300

ESTABLISHMENT OVERVIEW

1. Name of the Marijuana Establishment:

Alternative Therapies Group, Inc.

2. Address of the Marijuana Establishment:

10 Industrial Way, Amesbury, MA 01913

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

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

LICENSING OVERVIEW

4. The licensee was granted provisional licenses for both 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 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 4, 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 establishment must enter through the main entrance located in the rear of the building. Access to the establishment is restricted to employees with an RFID badge and individuals who are required to show appropriate identification. A visitor log is maintained. Visitors are escorted by the establishment’s employees throughout the facility. Doors and limited access areas inside the facility are locked and can only be unlocked with a RFID badge. All limited access areas had appropriate signage.

The establishment has a primary and secondary security alarm company. The camera system complies with all applicable requirements. Panic alarms are stationed throughout the facility. The establishment has the capability of remaining open during a power outage.

b. Inventory and Storage

All storage areas of the establishment were clean with no visible evidence of pests. All finished marijuana flower is held in containers that are stored in a secured vault. All finished infused products are packaged and securely stored in a commercial-grade refrigerator. Enforcement staff verified that the establishment has a plan to preserve 35% of its inventory for medical patients.

c. Cultivation Operation

The cultivation area at the establishment is divided into 19 rooms: 14 flowering rooms, two (2) vegetative rooms, and three (3) empty rooms. Enforcement staff measured the actual canopy of the establishment which is as follows:

Flowering Room(s)	9,686 sq. ft.
Vegetative Room(s)	1,637 sq. ft.
Empty Room(s)	20,100 sq. ft.
TOTAL CANOPY	31,423 sq. ft.

The establishment has been issued a Tier 5 provisional cultivation license (30,001 - 40,000 sq. ft.). The total canopy in the facility currently falls within this tier. As no marijuana is stored in the facility for adult-use operations, the total canopy was counted.

d. Product Manufacturing Operation

The product manufacturing area is a commercial kitchen that manufactures edible products. All of the establishment's products are produced in-house. A summary of the products to be produced was presented and corresponds with the establishment's license application. The manufacturing area was clean and found to be in compliance with the Commission's regulations.

e. Retail Operation (if applicable)

Not applicable.

f. Transportation

The establishment has one transportation vehicle that is registered in Massachusetts. It is equipped with a secure storage compartment and GPS tracking. Marijuana and marijuana products are not visible from outside the vehicle. Enforcement staff inspected the vehicle, as well as the establishment's transportation policy, and found them to comply 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 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.