

THE VERB IS HERB, LLC
MRN281637

BACKGROUND & APPLICATION OF INTENT REVIEW

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

The Verb is Herb, LLC

2. Address of the Marijuana Establishment:

74 Cottage Street, Easthampton, MA 01027

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

Retail

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

Applicant is not an applicant or licensee for any other Marijuana Establishment license.

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

William C. Hartley—Owner

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

No other entity, other than the applicant, appear to have direct or indirect authority over the Marijuana Establishment.

7. Priority status of applicant:

General applicant.

8. Location and status of business if it is an RMD:

Not applicable.

9. Information regarding host community agreement certification:

The Host Community Agreement was executed on May 23, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on June 19, 2018.
Notice was published at least seven days prior in the Daily Hampshire 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 a response from the municipality on September 27, 2018, stating that the applicant was in compliance with all local ordinances and bylaws.

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

The applicant plans to do the following:

- a. Provide career opportunities to residents of Holyoke, Springfield, and Amherst;
- b. Provide career opportunities to individuals with past drug convictions;
- c. Engage with career centers in areas of disproportionate impact for the purpose of advertising employment opportunities; and
- d. Donate portions of its revenue to the Commission's Social Equity Training and Technical Assistance Fund.

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:

No disclosures.

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

MANAGEMENT AND OPERATIONS REVIEW

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

The applicant states that it can be operational approximately two months from receiving a provisional license.

20. Applicant's proposed hours of operation:

Monday-Sunday: 10:00 a.m. to 10:00 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. Institute a "blind hiring" policy for hiring and recruitment purposes to eliminate conscious or unconscious bias;
- b. Engage with industry trade groups and recruitment companies that promote diversity and inclusion; and
- c. Hire and contract with suppliers and wholesale partners that are minority-, women-, veteran, LBGT-, and veteran-owned businesses.

23. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

25. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant plans to obtain marijuana or marijuana products by contracting with other licensed establishments.

26. ISO 17025 Certifying Body and Certificate Number (if applicable):

Not applicable.

RECOMMENDATION

Commission staff recommend issuing a provisional license with the following conditions:

- (1) 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;
- (2) 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;
- (3) The applicant shall cooperate with and provide information to Commission investigators, agents, and employees upon request;
- (4) Provisional license is subject to the payment of the appropriate license fee pursuant to 935 CMR 500.005; and
- (5) Final license is subject to the licensee providing Commission staff documentation demonstrating that the non-profit and/or charitable organizations (specifically the Boys and Girls Club and Girls Incorporated) that it plans to donate financial benefits to can receive such benefits from a marijuana-related business.

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 was 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.