

## HEALTH CIRCLE, INC.

MCN281787

MPN281533

MRN281426

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

1. Name and address of the proposed Marijuana Establishment:

Health Circle, Inc.  
21 Commerce Road, Rockland, MA 02370

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

Cultivation – Tier 3 / Indoor (10,001 to 20,000 sq. ft)  
Product Manufacturing  
Retail

3. 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.

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

Michael Westort – Director  
Lea Westort – Director  
Mary Carle – Director  
Elizabeth Peters – Director  
James Welch – Director  
Steven Ingenhutt – Close Associate  
Kenneth Wolf – Close Associate  
Robert Denn – Close Associate

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

MA RMD Services – listed as a close associate providing consulting services.

6. Applicant's priority status and information pertaining to co-located operations:

Provisional License Executive Summary 1



## RMD Priority

The MTC has a provisional license for dispensing, cultivation, and processing. The MTC business will be co-located with the adult-use business in Rockland.

7. The applicant and municipality executed a Host Community Agreement on August 15, 2018.
8. The applicant conducted a community outreach meeting on May 16, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 11, 2019 stating the applicant was in compliance with all local ordinances and bylaws.
10. The applicant proposed the following programs for its Positive Impact Plan:
  - a. Institute hiring practices that prioritize the hiring of individuals from Abington, Braintree, Brockton, Quincy, and Randolph;
  - b. Partner with specifically listed organizations in areas of disproportionately impacted areas; and
  - c. Holding quarterly in-store donation drives, including direct giving and ongoing food and clothing drives.

## **SUITABILITY REVIEW**

11. There were no concerns arising from background checks on the individuals or entities associated with the application.
12. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.

## **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within three (3) months of receiving their provisional license.
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 8:00 a.m. – 10:00 p.m.  
Sunday – 10:00 a.m. – 7:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



16. The applicant proposed the following programs for its Diversity Plan:

- a. Maintaining a diverse board of directors;
- b. Host career fairs in underrepresented and minority communities;
- c. Provide training on cultural sensitivity and recognizing unconscious bias; and
- d. Utilize vendors and suppliers who are also committed to diversity and inclusion.

17. Summary of cultivation plan (if applicable):

The applicant submitted a detailed cultivation plan that demonstrated the ability to comply with the Commission's regulations.

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

- a. Dissolving tablets and strips;
- b. Tinctures;
- c. Nasal/oral sprays;
- d. Suppositories;
- e. Hash distillates;
- f. Oils;
- g. Waxes;
- h. Shatters;
- i. Budders;
- j. Live resin;
- k. Saps;
- l. Taffies;
- m. Crumbles;
- n. Moon rocks;
- o. Creams;
- p. Salves;
- q. Lotions;
- r. Body butters;
- s. Topicals;
- t. Dermal patches;
- u. Capsules;
- v. Cooking oils;
- w. Beverages;
- x. Sauces;
- y. Dips;
- z. Baked goods;
- aa. Confections;
- bb. Chocolates;
- cc. Candies;
- dd. Gums;



- ee. Sugars;
- ff. Salts;
- gg. Syrups;
- hh. Butters;
- ii. Mints; and
- jj. Teas.

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

The applicant is a vertically integrated MTC that has applied for adult-use cultivation and product manufacturing licenses. The applicant plans to provide its own marijuana products.

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

Not applicable.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. In order to ascertain further control over the Marijuana Establishment, and prior to the issuance of a final license, the licensee shall furnish to the Commission the following documentation:
  - a. Contractual and management agreements between Health Circle, Inc. and MA RMD SVCS, LLC;
  - b. Contractual and management agreements between MA RMD SVCS, LLC and Acreage Holdings that, implicitly or explicitly, involves or applies to Health Circle, Inc.;
  - c. A memorandum of position describing the relationship amongst Health Circle, Inc., MA RMD SVCS, LLC, and Acreage Holdings.
6. Final license is subject to the licensee revising its Positive Impact Plan to address the following and supplying it to Commission staff:
  - a. Stating the number of events that will be held as it pertains to its continuing efforts;
  - b. Removing any mention to programs that “may” be implemented and affirming the programs that it “shall” implement;
  - c. Providing stated goals for its plan;
  - d. Ensuring that all programs and actions will be taken on behalf of the establishment and not any individual person in their individual capacity.



The applicant has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the applicant is recommended for provisional licensure.

