



THEORY WELLNESS, INC

MRN281835

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Theory Wellness, Inc.
672 Fuller Road, Chicopee, MA 01020

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

Retail

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

Cultivation – Tier 1 / Indoor (up to 5,000 sq. ft)
(Received a final license in Bridgewater)

Cultivation – Tier 6/Outdoor (40,001 – 50,000 sq. ft)
(Provisionally licensed in Sheffield)

Product Manufacturing
(Received a final license in Bridgewater)

Retail
(Received a final license in Great Barrington)

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

Nick Friedman—Board Member
Brandon Pollock—Board Member
Hunter Pollock—Board Member
Andrew Linegar—Board Member
Steven Derrey—Board Member
Asher Woodworth—Board Member
Benjamin Friedman—Board Member

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

Provisional License Executive Summary 1



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

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

MTC Priority

The MTC has a Final Certificate of Registration for dispensing, cultivation, and processing. The MTC will not be co-located with the adult-use establishment.

7. The applicant and municipality executed a Host Community Agreement on January 28, 2019.
8. The applicant conducted a community outreach meeting on February 13, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 10, 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. Host a career fair once per year in Springfield;
 - b. Give priority to local businesses, suppliers, contractors, builders, and vendors in Springfield for services to the Marijuana Establishment; and
 - c. Donate at least \$5,000.00 to organizations and/or non-profits whose missions are to improve areas of disproportionate impact.

SUITABILITY REVIEW

11. There were no concerns arising from background checks on the individuals or entities associated with the application.
12. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within one (1) month of receiving its provisional license.
14. The applicant's proposed hours of operation are the following:

Monday – 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. Implement hiring practices to reduce bias, promote participants in the Commission's Social Equity Program, and advertise positions to reach diverse individuals;
- b. Hold training sessions in Springfield at least once a year; and
- c. Comprise a management team of at least 30% of individuals that are women, veterans, minorities, or people with disabilities.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

The applicant is a vertically integrated MTC that is applying for adult-use cultivation and product manufacturing. It plans to supply its own products. In the event of any shortage, the applicant will seek marijuana and marijuana products from other licensees.

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. Final licensure is subject to the applicant providing to Commission staff an amended Positive Impact Plan that addresses the following: (1) provide clarity regarding the timeline to accomplish the "20% of our workforce" goal, (2) provide clarity and specific information regarding the alternative plan if the previous goal is not met, (3) provide clarity



- regarding the specific areas of Springfield that will be focused on in order to ensure that the specific area is an area of disproportionate impact as defined by the Commission, and (4) to include any current initiatives that the applicant may be undertaking but was unable to include in the previously submitted plan; and
6. Final licensure is subject to the applicant providing to Commission staff an amended Diversity Plan that addresses the goal of “30% of our management [will be] comprised of minorities, women, veterans, and/or people with disabilities” in order to aspire to current population diversity between genders.

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.

