**Marijuana Establishment Renewals**  
**Executive Summary**  
**Commission Meeting: July 17, 2019**

**Renewal Overview**

1. Name, license number, renewal application number, host community, and funds deriving from a Host Community Agreement allocated for the municipality for each Marijuana Establishment presented for renewal:

<table>
<thead>
<tr>
<th>Marijuana Establishment Name</th>
<th>License Number</th>
<th>Renewal Application Number</th>
<th>Location</th>
<th>Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultivate Holdings, LLC</td>
<td>MC281266</td>
<td>MCR139823</td>
<td>Leicester</td>
<td>$495,019.00</td>
</tr>
<tr>
<td>Cultivate Holdings, LLC</td>
<td>MR281268</td>
<td>MRR205524</td>
<td>Leicester</td>
<td>$495,019.00</td>
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<td>Alternative Therapies Group, Inc.</td>
<td>MC281255</td>
<td>MCR139822</td>
<td>Amesbury</td>
<td>$0.00</td>
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<td>Alternative Therapies Group, Inc.</td>
<td>MP281300</td>
<td>MPR243478</td>
<td>Amesbury</td>
<td>$0.00</td>
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<td>MRR205522</td>
<td>Amesbury</td>
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<td>SIRA Natural, Inc.</td>
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<td>MCR139821</td>
<td>Milford</td>
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<td>SIRA Natural, Inc.</td>
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<td>MXR126654</td>
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<td>$0.00</td>
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<td>MPR243480</td>
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<td>New England Treatment Access, LLC</td>
<td>MC281267</td>
<td>MCR139825</td>
<td>Franklin</td>
<td>$300,000.00</td>
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<td>MRR205525</td>
<td>Northampton</td>
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<td>New England Treatment Access, LLC</td>
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<td>MRR205526</td>
<td>Brookline</td>
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<td>New England Treatment Access, LLC</td>
<td>MP281306</td>
<td>MPR243479</td>
<td>Franklin</td>
<td>$300,000.00</td>
</tr>
</tbody>
</table>

2. All licensees have submitted renewal applications pursuant to 935 CMR 500.103(4) which include the licensee’s disclosure of their progress or success towards their Positive Impact and Diversity Plans.
3. All licensees have submitted documentation of good standing from the Secretary of the Commonwealth, Department of Revenue, and Department of Unemployment Assistance, if applicable.

4. All licensees have paid the appropriate annual license fee.

5. The licensees, when applicable, have been inspected over the previous year. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 500.450.

**RECOMMENDATION**

Commission staff recommend review and decision on the above-mentioned licenses applying for renewal, and if approved, request that the approval be subject to the licensee remaining in compliance with the Commission regulations and applicable law.

In addition to all licensees remaining in compliance with the Commission’s regulations and applicable law, the following conditions apply to specific licensees:

1. Cultivate Holdings, LLC (MC281266)
   a. In a timely manner, the licensee shall provide information relative to its Positive Impact Plan progress on its partnership program initiative;
   b. In a timely manner, the licensee shall provide information relative to its Positive Impact Plan on the amount of funds were specifically given to each identified group and the basis for determining that this program would benefit disproportionately impacted areas; and
   c. In a timely manner, the licensee shall provide more information on its diversity sensitivity programs or initiations.

2. Cultivate Holdings, LLC (MR281268)
   a. In a timely manner, the licensee shall provide information relative to its Positive Impact Plan progress on its partnership program initiative;
   b. In a timely manner, the licensee shall provide information relative to its Positive Impact Plan on the amount of funds were specifically given to each identified group and the basis for determining that this program would benefit disproportionately impacted areas;
   c. In a timely manner, the licensee shall provide more information on its diversity sensitivity programs or initiations;
   d. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, submit the licensee’s policies and procedures for ensuring maintenance of a sufficient quantity and variety of marijuana products for patients, consistent with the requirements of 935 CMR 500.140(10); and
e. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, provide the licensee’s policies and procedures for determining what qualifies as a reasonable substitution for a marijuana product under 935 CMR 500.140 (10).

3. Alternative Therapies Group, Inc. (MC281255)

   a. In a timely manner, the licensee shall provide to the Commission a description of its practices on employee’s self-identifying for the purposes of showing progress or success towards its Diversity Plan.

4. Alternative Therapies Group, Inc. (MP281300)

   a. In a timely manner, the licensee shall provide to the Commission a description of its practices on employee’s self-identifying for the purposes of showing progress or success towards its Diversity Plan.

5. Alternative Therapies Group, Inc. (MR281346)

   a. In a timely manner, the licensee shall provide to the Commission a description of its practices on employee’s self-identifying for the purposes of showing progress or success towards its Diversity Plan;
   b. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, submit the licensee’s policies and procedures for ensuring maintenance of a sufficient quantity and variety of marijuana products for patients, consistent with the requirements of 935 CMR 500.140(10); and
   c. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, provide the licensee’s policies and procedures for determining what qualifies as a reasonable substitution for a marijuana product under 935 CMR 500.140 (10).

6. SIRA Natural, Inc. (MC281252)

   a. Within three months of this renewal, the licensee shall provide an updated progress report on its Diversity Plan and related goals, programs, and metrics.

7. SIRA Natural, Inc. (MX281310)

   a. Within three months of this renewal, the licensee shall provide an updated progress report on its Diversity Plan and related goals, programs, and metrics.

8. SIRA Natural, Inc. (MP281303)
a. Within three months of this renewal, the licensee shall provide an updated progress report on its Diversity Plan and related goals, programs, and metrics.

9. New England Treatment Access, LLC (MC281267)

   a. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Positive Impact Plan, specifically, its mentorship program, internship program, and coaching/touring initiatives; and 
   b. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Diversity Plan, specifically, an update on its initiatives regarding persons with disabilities.

10. New England Treatment Access, LLC (MR281240)

   a. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Positive Impact Plan, specifically, its mentorship program, internship program, and coaching/touring initiatives; 
   b. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Diversity Plan, specifically, an update on its initiatives regarding persons with disabilities; 
   c. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, submit the licensee’s policies and procedures for ensuring maintenance of a sufficient quantity and variety of marijuana products for patients, consistent with the requirements of 935 CMR 500.140(10); and 
   d. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, provide the licensee’s policies and procedures for determining what qualifies as a reasonable substitution for a marijuana product under 935 CMR 500.140 (10).

11. New England Treatment Access, LLC (MR281287)

   a. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Positive Impact Plan, specifically, its mentorship program, internship program, and coaching/touring initiatives; 
   b. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Diversity Plan, specifically, an update on its initiatives regarding persons with disabilities; 
   c. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, submit the licensee’s policies and procedures for ensuring maintenance of a sufficient quantity and variety of marijuana products for patients, consistent with the requirements of 935 CMR 500.140(10); and
d. The licensee shall, as a co-located medical and adult-use retail Marijuana Establishment, within 60 days, provide the licensee’s policies and procedures for determining what qualifies as a reasonable substitution for a marijuana product under 935 CMR 500.140 (10).

12. New England Treatment Access, LLC (MP281306)

a. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Positive Impact Plan, specifically, its mentorship program, internship program, and coaching/touring initiatives; and

b. Within three months of this renewal, the licensee shall provide an updated progress report as it relates to its Diversity Plan, specifically, an update on its initiatives regarding persons with disabilities.