SANCTUARY MEDICINALS, INC.
RMD-1128

ESTABLISHMENT OVERVIEW

1. Name of the Medical Marijuana Treatment Center:
   Sanctuary Medicinals, Inc.

2. Address(es) of Medical Marijuana Treatment Center:
   Cultivation: 234 Taylor Street, Littleton, MA 01460
   Product Manufacturing: 234 Taylor Street, Littleton, MA 01460
   Dispensary: 130 Commerce Way, Woburn, MA 01801

3. The licensee is a licensee or applicant for other Marijuana Establishment(s) or Medical Marijuana Treatment Center (“MTC”) license(s):
   MTC (Commenced operations at the dispensary in Gardner)
   MTC (Commenced operations at the dispensary in Danvers)
   Cultivation (Commenced operation in Littleton)
   Product Manufacturing (Commenced operation in Littleton)
   Retail (Commenced operation in Gardner)
   Retail (Provisional license in Brookline)

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure on December 9, 2016.

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 license.

Final License Executive Summary 1
INSPECTION OVERVIEW

8. The initial inspection took place at the facility on May 28, 2019.

9. The licensee’s Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000 as applicable.

10. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local codes, bylaws, laws, ordinances, and regulations.

11. Specific information from Commission staff’s inspection is highlighted below:

   a. **Security**

      Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:
      
      i. The security of all entrances and exits;
      ii. Visitor procedures;
      iii. Limited access areas;
      iv. Verification of a primary and back-up security company;
      v. Presence of perimeter and duress alarms; and
      vi. All cameras complied with Commission requirements.

   b. **Inventory and Storage**

      Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:
      
      i. Secure storage of marijuana and marijuana products;
      ii. Sanitation and pest control measures; and
      iii. Inventory controls and procedures.

   c. **Cultivation Operation**

      The cultivation operation connected to this license has previously been given permission to commence operations.

   d. **Product Manufacturing Operation**

      The product manufacturing operation connected to this license has previously been given permission to commence operations.

   e. **Dispensing Operation**
Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:
   i. Verification of identifications for access;
   ii. Layout of the sales floor;
   iii. Availability and contents of patient education materials; and
   iv. Policies to ensure dispensing limits are followed.

f. Transportation

Enforcement staff verified that all transportation-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:
   i. Vehicle and staffing requirements;
   ii. Communication and reporting requirements; and
   iii. Inventory and manifests requirements.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Medical Marijuana Treatment Centers, or to patients, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 501.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

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

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.