

**THEORY FARMS, LLC**  
MCN281657

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Theory Farms, LLC  
26 William Way, Bellingham, MA 02019

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

Cultivation, Tier 2/Indoor (5,001 to 10,000 sq. ft.)

The application was reopened one time for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type. However, individuals associated with this application are also associated with Theory Wellness.

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

Individual	Role
Brandon Pollock	Board Member
Nick Friedman	Board Member
Andrew Linegar	Board Member
Steven Derrey	Board Member
Benjamin Friedman	Capital Contributor

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

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:



MTC Priority Applicant

- 7. The applicant and municipality executed a Host Community Agreement on September 11, 2018.
- 8. The applicant conducted a community outreach meeting on September 18, 2018 and provided documentation demonstrating compliance with Commission regulations.
- 9. The Commission received a municipal response from the municipality on August 30, 2019 stating the applicant was in compliance with all local ordinances and bylaws.
- 10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate \$5,000.00 annually to Massachusetts' Recreational Consumer Council.
2	Spend 10% capital expenditure on vendors based in Walpole.
3	Hire 10% of individuals from Walpole.

**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 six (6) to (7) seven months of receiving their provisional license.
- 14. The applicant's proposed hours of operation are the following:  
  
Monday-Sunday: 6:00 AM - 6:00 PM
- 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 goals for its Diversity Plan:

#	Goal
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1	Have 30% of management compromised of Commission-approved diverse populations.
2	Hold annual training in Walpole to increase equity in the cannabis industry.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission’s regulations.

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

Not applicable.

19. Plan for obtaining marijuana or marijuana products (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; and
5. Final license is subject to the applicant providing updated dates for programs that plan to implement that are associated with the Positive Impact Plan and this specific license.

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.

