

**CULTIVATE HOLDINGS, LLC**  
**RMDA3193**

**BACKGROUND & APPLICATION REVIEW**

1. Name and location of the proposed Medical Marijuana Treatment Center:

Cultivate Holdings, LLC

Cultivation: 100 Campanelli Drive, Uxbridge, MA 01569

Product Manufacturing: 100 Campanelli Drive, Uxbridge, MA 01569

Dispensary: 250 Worcester Road, Framingham, MA 01702

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

Type	Status	Location
MTC	Commence Operations	Leicester-Leicester
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Commence Operations	Leicester
Cultivation, Tier 5/Indoor (30,001 – 40,000 sq. ft.)	Provisional License	Uxbridge
Product Manufacturing	Commence Operations	Leicester
Product Manufacturing	Provisional License	Uxbridge
Retail	Commence Operations	Leicester
Retail	Provisional License	Worcester
Retail	Commence Operations	Framingham

3. List of all required individuals and their business roles in the Medical Marijuana Treatment Center:

Individual	Role
Samuel Barber	Owner/Partner
Robert Lally	Owner/Partner
Stephen Barber	Owner/Partner
Mark Frechette	Executive/Officer



4. List of all required entities and their roles in the Medical Marijuana Treatment Center:  
  
No other entity appears to have ownership or control over this proposed Marijuana Establishment.
5. The applicant executed a Host Community Agreement with Uxbridge (Cultivation and Product Manufacturing) on May 15, 2019. Additionally, the applicant executed a Host Community Agreement with Framingham (Retail) on June 13, 2019.
6. The applicant conducted a community outreach meeting on April 29, 2019 (Uxbridge – Cultivation and Product Manufacturing). Additionally, the applicant conducted a community outreach meeting on August 16, 2019 (Framingham – Retail) and provided documentation demonstrating compliance with Commission regulations.
7. The Commission received a municipal response from Uxbridge (Cultivation and Product Manufacturing) on June 8, 2020 stating the applicant was in compliance with all local ordinances and bylaws. Additionally, The Commission sent the municipal notice to the City/Town of Framingham on June 4, 2020. To date, the Commission has not received a response.
8. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Cultivate Holdings will host two (2) networking events through the “Cultivate Launch Program” which will benefit past or present residents of areas of disproportionate impact; Massachusetts residents who have past drug convictions; and Commission-designated Economic Empowerment Priority Applicants by providing a select number of participants with exclusive access to the company’s training programs. During the first year, five (5) participants will be recruited. Programs will include an employee training program, manager training program, hands on training as a responsible vendor, methods of production and information of the various strains (and effects) of cannabis.
2	One (1) day monthly, Cultivate Holdings will donate 10% of the company’s gross sales to charities that provide services to past or present residents of areas of disproportionate impact or, who help Massachusetts residents with past drug convictions. Charities may include One Life at a Time, Community Servings Food Heals and One Mission, Project New Hope, Cultivate Care Farms and Project Place.

**SUITABILITY REVIEW**

9. There were disclosures of past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.



10. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

11. The applicant states that it can be operational upon receipt of provisional licensure.

12. The applicant's proposed hours of operation are the following:

Monday – Sunday: 6:30 a.m. – 4:30 p.m. (Cultivation and Product Manufacturing)

Monday – Sunday: 10:00 a.m. – 8:00 p.m. (Retail)

13. The applicant submitted all applicable and required summaries of procedures for the operation of the proposed Medical Marijuana Treatment Center. The summaries were determined to be substantially compliant with the Commission's regulations.

14. The applicant disclosed that it plans to perform home deliveries to registered patients. The summary of the applicant's plan is consistent with the Commission regulations and guidance documents.

15. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Give hiring preference to individuals identifying as minorities, women, veterans and/or people with disabilities. Cultivate Holdings seeks to comprise their workforce of at least 40% of individuals falling in the above listed demographics.
2	Mandatory Sensitivity Training which will require all employees to complete this training within ninety (90) days of hire, and once annually thereafter.

16. Summary of cultivation plan:

The applicant submitted a summary of a cultivation plan that demonstrated the ability to comply with the regulations of the Commission.

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

#	Product
1	Gel Capsules
2	Sublingual Tinctures
3	Balms (Topicals)
4	Edibles
5	Cookies (round shape) – chocolate chip



6	Caramels (square shape) – caramel flavor
7	Gummies (hexagon shape) – mango, strawberry kiwi, watermelon, blackberry, green apple, peach
8	Nosh cheese crackers (round shape)
9	Pre-filled vaporizer cartridges

**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. Final licensure is subject to the applicant providing Commission staff, upon inspection, with an updated Positive Impact Plan that specifies the cohort the licensee seeks to impact, provide clarification as to why the licensee intends to reach out to Boston City Councillors when facilities are located in Central Massachusetts, and provide clarification on how donations to the Leukemia & Lymphoma Society, Chrons & Colitis Foundation, One Mission, Project Place, and Home base will directly impact the specific cohorts;
4. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors;
5. Final licensure is subject to the applicant updating its Security Plan and Standard Operating Procedures to ensure full compliance with 935 CMR 501.110(9) as it pertains to notification to the Commission and local law enforcement regarding inventory discrepancies;
6. The applicant shall cooperate with and provide information to Commission staff; and
7. Provisional licensure is subject to the payment of the appropriate license fee.

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.

