

SROOT 2 NATURALS, LLC
MBN281675

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Root 2 Naturals, LLC
201 Daniel Shays Highway, Athol, MA 01331

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

Microbusiness (Cultivation and Product Manufacturing Operations)

The application was reopened two (2) times 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.

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

Individual	Role
Paul Pace	Owner / Partner
Paul V. Pace	Owner / Partner
Frank Pace	Owner / Partner

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:

Expedited Applicant (License Type)



7. The applicant and municipality executed a Host Community Agreement on October 15, 2019.
8. The applicant conducted a community outreach meeting on August 7, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Athol on June 19, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate a total of \$5,000 annually to New England Veterans Alliance.

SUITABILITY REVIEW

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within three (3) months of receiving the provisional license(s).
14. The applicant’s proposed hours of operation are the following:

Monday – Friday: 8:00 a.m. – 4:00 p.m.
Saturday – Sunday: 8:00 a.m. – 12:00 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 goals for its Diversity Plan:

#	Goal
1	Recruit 10% women, 10% minorities, 10% veterans, 10% persons with disabilities, and 10% individuals that identify as LGBTQ+.

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):

#	Product
1	Bubble Hash
2	Pressed Kief (Hash)
3	Rosin
4	Infused Butter (Canna-butter)
5	Infused Coconut Oil

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. Final licensure is subject to the applicant providing Commission staff, upon inspection, with an updated Positive Impact Plan that specifies the cohort the licensee is seeking to impact, includes additional goals other than donations, and clarification on how a donation to New England Veteran Alliance will directly impact the chosen cohort;
4. Final licensure is subject to the applicant providing Commission staff, upon inspection, with an updated Diversity Plan that modifies the percentages of women representation to be objectively reasonable;
5. 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;
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.

