

Somerville HCA Application Supplemental Response

February 5, 2020



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RE: Supplemental Response to Marijuana Advisory Committee's HCA Application Review

In advance of Somerville's Marijuana Advisory Committee's (MAC) next round of review of the Host Community Agreement (HCA) applications, Sira Naturals is pleased to submit this Supplemental Response to its Adult-Use HCA Application with the City of Somerville dated April 5, 2019. Our response set forth below responds to questions from the MAC's letter dated September 18, 2019.

Founded and operated by Massachusetts natives and residents since 2013, Sira Naturals has weathered an unpredictable cannabis market to become one of the state cannabis industry's largest employers and a well-respected vertically integrated cultivator, product manufacturer, and retailer of cannabis products for both the medical and adult-use markets in Massachusetts. Adapting to the volatility of this burgeoning market with dogged persistence, Sira Naturals managed to accomplish a series of "firsts" in the Massachusetts cannabis industry as years of trial and error slowly gave way to discovery and innovation. Sira Naturals' notable achievements include:

- Among the first Massachusetts cannabis companies to open its doors to the public;
- The first and only Massachusetts cannabis company to voluntarily unionize its workforce;
- The first Massachusetts cannabis company to create a cannabis accelerator program to empower small business development through mentoring of economic empowerment applicants in the cannabis industry;
- The first Massachusetts cannabis company to focus on responsible public policy by partnering with the Commonwealth of Massachusetts Executive Office of Public Safety and Security to produce a public service announcement highlighting the dangers of youth use and impaired driving;

- The first Massachusetts cannabis company receiving Cannabis Control Commission approval – the industry gold stand for excellence – when the CCC trains its employees it comes to Sira Facilities¹; and
- The first Massachusetts cannabis company partnering with established community organizations, like the Community Action Agency of Somerville, to ensure the care, assistance and subsidy provided to constituents living with the consequences of the War on Drugs will continue and grow.

What we achieved for our patients and our community partners during a time when the cannabis industry was just beginning in Massachusetts, and in the country, is nothing short of extraordinary. However, it is tempting to look at our success today and conclude that our achievements were a foregone conclusion. In fact, operating a cannabis business at the exacting standards for which Sira Naturals is known, is both a high-risk as well as a very capital-intensive undertaking. Before we could even open our doors, or hire our first store manager, there were tens of millions of dollars required to ensure that cannabis products were safe and effective. Even though cannabis is an ancient agricultural product, the market is still very new and subject to immeasurable volatility.

To add yet another layer of uncertainty, there are persistent headwinds to securing necessary funding for cannabis companies, further exacerbated by strict federal regulations and a lack of traditional financing options through banks and lenders that would normally be available to businesses outside of the cannabis industry. These headwinds foreshadowed the fact that Sira - like any cannabis company in Massachusetts with hopes of long-term success - was eventually going to have to face the harsh reality of existing market forces, no matter what our size and our exceptional reputation could achieve.

Recapitalization & Stock Swap

With these realities facing Sira and cannabis companies nationally, about a year ago Sira realized that we needed to secure our future by obtaining access to sufficient capital allowing us to maintain our business through this unpredictable financial situation, while at the same time allowing Sira to continue to grow and adhere to its corporate values of sustainability, community and integrity. After fielding numerous offers for partnership and collaboration, Sira found a suitable partner in Ayr Strategies, a company with the strong financial foundation that we needed, as well as the healthy respect for the continued local independence of our company. In May 2019, Sira Naturals engaged in a stock swap transaction in which the existing shareholders of Sira exchanged shares with Ayr Strategies, Inc., as outlined in the filings we submitted with the Cannabis Control Commission.

Under this type of stock swap, (technically referred to as a “1031 Exchange” under §1031 of the United States Internal Revenue Code) the fundamental principle is that each of Sira’s former shareholders have now become shareholders of Ayr Strategies. As a result, a single member (Mr. Jonathan Sandelman). was added to the Sira Board from Ayr Strategies. The reason why it’s called a swap is so that members have a mutual interest in the success of the underlying business. In this case, Sira Naturals can use Ayr Strategies’ recapitalization investment to provide the necessary cushion to weather the continuing unpredictable nature of the cannabis business.

¹ *How Mass. Cannabis Inspectors Keep a Watchful Eye over the Legal Pot Industry* by Steve Brown WBUR November 18, 2019 <https://www.wbur.org/bostonomix/2019/11/18/riding-along-recreational-marijuana-inspection>

Sira chose this strategy for capital infusion for several reasons, but the most important to us was that giving up our local management over the business was never an option. This state-approved stock swap allowed Sira to remain as the same well-run local company, but with some added capital to back us up. In addition to Jonathan Sandelman joining the Sira Board, as you will see in the attached organizational charts, Ayr Strategies also gained a new board member, Louis Karger from Sira Naturals. As a result of the stock swap, Sira Naturals gained greater access to institutional capital within this constrained capital market and Ayr Strategies got a local operational partner with world-class cannabis products and management, along with vast operational experience in Massachusetts. This allows Sira Naturals to have a strong voice on the Board of Directors at Ayr Strategies to ensure independence and local management that is so important to us as a company.

The Impact of Recapitalization on Sira Operations and Management Team

A critical factor for Sira prior to engaging in this swap, was that management would not change locally – and I’m delighted to report to you that, because we chose this course, while some stock ownership may have changed, the local management of the company has remained the same as a result of the stock swap. There was no restructuring of our business. No employees were let go, laid off, or otherwise negatively affected. All Sira Naturals’ Board Members remained in their roles on the Board and the Sira Naturals’ Executive Management Team remained the same. Everyone that was operating our Massachusetts stores and facilities prior to the recapitalization also remained.

In fact, the recapitalization efforts with Ayr Strategies has already had a rippling effect of improvements to management and operations. Sira has expanded production capabilities at our Milford facilities by increasing the workforce by 81 employees, a 42% expansion across all departments, resulting in significant growth in new product development. To accommodate this growth, we expanded our sales and marketing team with an emphasis on product education for our store teams as well as the patient community. The expansion of product education is most notable in Somerville where our product selection has increased over 25% over the past four months. As a result, Somerville’s monthly sales increased over 30% and patient experience has never been better. In addition, we proactively engaged our employees to unionize and added a department of Government Relations & Community Investment as you will see below.

We also recognize that the success of our local business is predicated on maintaining a clear line of communication with the City of Somerville. In response to your September 18, 2019 letter, and out of an abundance of caution, Sira Naturals asked outside counsel to comment on the details of, as well as the competing standards within, the Change of Ownership submission that we submitted to the Cannabis Control Commission. For your reference, please see the Memorandum from David H. Rich, Esq. of Todd & Weld LLP (*Attachment 1*) and corresponding Organization charts (*Attachment 2*).

The Impact of Recapitalization on Sira Naturals' Workforce

With the investment of recapitalization funds and additional governance approaches, Sira's management plan has been redesigned to transform the cannabis industry's methodology and approach in communities disproportionately impacted by the War on Drugs. In 2020, Sira has refocused its efforts towards economic development through access to sustainable jobs, business mentoring opportunities, and direct community investment beyond HCA mandated public benefits payments.

- **United Food and Commercial Workers (UFCW Local 1445)**

Sira Naturals is in the final stages of the employee/member ratification process for its Collective Bargaining Agreement (CBA) with UFCW Local 1445. As a union employer, Sira Naturals can avoid cannabis industry workforce tensions by adhering to highly competitive hourly wage standards that ensure the industry's utilization of non-regular part-time employees does not undermine the concept of full-time work. With the implementation of the Union's *Diversity Plan for Equitable Opportunities in the cannabis/Marijuana Business* and *cannabis Industry Apprenticeship Program* through employer contributions to a Joint Labor Management Apprenticeship Fund, Sira Naturals will work closely with Local 1445 to meet and surpass its diversity and inclusion hiring goals set forth in the Diversity Plan. (*Attachment 3 – Diversity Plan*)

- **Transportation Barrier and Remedy Study**

What happens if an otherwise employment eligible Somerville resident, without access to a car, wants to work in Sira's production or manufacturing departments in Milford, Massachusetts? Most likely, the applicant will not want to accept the job without a viable transportation alternative - because Sira's large Milford facility is not accessible by public transit. Too often, areas of disproportionate impact are in neighborhoods where commuting to work is a challenge regardless of the industry. For our retail facilities in the greater Boston area, transportation can be a challenge for people from these impacted communities and, in turn, become a barrier to entry in the cannabis industry.

In 2020, Sira is addressing this barrier to entry by engaging a Transportation Barrier and Remedy Study that will also include a monitoring and evaluation plan. This plan would allow Sira Naturals to assess the impact of new transportation programs on expanding hires from the CCC-designated impacted communities into careers beyond the retail facilities, and therefore providing applicants a choice of how and in what capacity they experience the cannabis industry. We expect that our Transportation Barrier and Remedy Study will require some creative solutions such as carpooling, hiring vans for dedicated routes, facilitating car loans, or other innovative approaches. We look forward to working with the Somerville office of Workforce Development as we seek realistic and practical solutions towards access to sustainable jobs. (*Attachment 4 – Positive Impact Plan*)

- **Somerville Workforce Development Partnership**

Sira is expanding its relationship with Somerville's workforce development ecosystem with an eye towards hiring, training, and apprenticeships for our Somerville store as well as our grow facilities in Milford, MA. Working in partnership with UFCW Local 1445 and Somerville's Workforce Development department, Sira will host cannabis Training and Information sessions to create a

pool of interested applicants for a proposed adult-use cannabis facility in Somerville and our production and manufacturing facility in Milford.

The Impact of Recapitalization on Diversity

As a result of our stock swap with Ayr Strategies, Sira is making significant strides in generating a more diverse workforce, not just for our own human resources pipeline, but for the entire cannabis industry. Among the largest commitments we've made over the past year, our company has been focused on creating investment in organizations that positively affect the job opportunities and quality of life for those affected by the War on Drugs.

- **Mass CultivatED Founding Member/ Board of Overseers**

The mission of the CultivatED Program is to empower, educate, and employ individuals from areas of disproportionate impact, as identified by the Massachusetts Cannabis Control Commission, who have been harmed by the War on Drugs. The CultivatED Program collaborates with Institutional Partners, Founder's Circle benefactors, and Program Members in order to create a fellowship program to provide selected fellows with individualized pro-bono legal services, background checks, suitability support services, a fully funded certificate program of higher education, placement in a paid and fully benefitted co-operative learning position, an externship program for educational credit hours, and support for job placement upon successful completion of CultivatED's fellowship program. CultivatED's goal is to successfully expand these objectives to encompass a fully accredited associate degree-issuing program recognized and provided on a statewide basis by CultivatED and the Commonwealth's 15 accredited community colleges.

The Institutional Partners of CultivatED are Roxbury Community College, Roxbury Community College Foundation, Greater Boston Legal Services, the Urban League of Eastern Massachusetts, the Massachusetts Association of Community Colleges, and Lawyers for Civil Rights (Boston). Sira Naturals is one of four members of Mass CultivatED's Founder's Circle. As a member of the Founder's Circle, Sira Naturals has pledged an annual contribution of at least \$25,000.

Sira will use the services of CultivatED program to have CORI records expunged and sealed for otherwise employment eligible job applicants in instances where the conviction was in the past and does not reflect the person applying for the job today. Presently, the Cannabis Control Commission's "cradle to grave" background check requirement for medical dispensaries forces us to not consider otherwise eligible applicants from getting good union jobs for a conviction over twenty years ago. Sira is working with the CCC to develop a hiring policy that considers the convicting offense and time frame proximity to provide applicants a second chance in instances where the conviction is in the distant past. (*Attachment 4 – Positive Impact Plan*)

- **Sira AMEND**

We believe that the cannabis industry, as well as our own company, must invest in people and in places to counteract disparate treatment by ensuring those most impacted by the War on Drugs have full access and a means of entry into the cannabis industry. Sira Amend is our training initiative that will provide community outreach and information about the cannabis industry. However, it will be a "two-way" program, in that it will give Sira an opportunity to better

understand the interests and needs of impacted neighborhoods in the greater Boston area. Operating under the premise that “you cannot become part of an industry you don’t know exists”, Sira’s training/information program is designed to bring information to community members who may be unaware of the cannabis industry because of a lack of interest in becoming involved with what was recently an illicit drug; or, more likely, community members with a well-founded fear of cannabis given their experience with the devastating consequences of friends and family who have faced conviction and incarceration in a judicial system where cannabis possession served as the preferred and lawful pretext for arrest.

Similar use

Cannabis use, for most groups, is about 6-12% of population

	Men	Women
White (non-Hispanic)	11.0%	6.7%
Black (non-Hispanic)	8.0%	7.7%
Hispanic	8.9%	9.2%
Asian/Pacific Islander	7.7%	2.0%

Dis-similar impact

Arrest rates in 2010, were almost 4 times higher for Blacks than Whites

	Black	White
Arrests per 100,000 of population	716	192



Source: “There is a Place for You in the cannabis Industry” Module 1 (January 2020)

Massachusetts’ groundbreaking cannabis legislation seeks to make amends for disparate treatment that has disproportionately restricted access to business ownership and opportunity for many people of color in the Commonwealth. The Cannabis Control Commission’s Equity Empowerment and Social Justice programs present a laudable first step towards equity and access for people of color to enter the cannabis industry. As demonstrated in the chart above, disparate treatment in the judicial system has been a poignant feature of living in the United States – often disproportionately directed towards Americans of African slave descent – but includes many more people as a result of national origin or religion. Disparate treatment will not be resolved by one industry no matter how lucrative or innovative. However, we believe the Massachusetts cannabis industry can, and is, creating programs and methodologies to counteract the impacts of disparate treatment. Sira Naturals seeks to become an industry leader in this regard beginning with targeted community investment in housing stability and transportation strategies described above. In October 2019, Sira at the urging of Ayr, created a Government Relations & Community Investment department to develop collaborative strategies with measurable outcomes for impacted communities and invited UFCW local 1445 to join the Sira team. These welcomed additions to our team created a management structure that strengthened Sira’s operational integrity so we can, with confidence, positively impact the lives of people and communities left behind by the War on Drugs.

The Impact of Recapitalization on Community Investment

As a locally run retailer and cultivator, we believe that our community partners are the source of our strength as an organization. We value these partnerships and recognize that, without them, our business would never have had the chance to grow into the success that it is today. That's why our recapitalization effort was designed to further the significant efforts we've made to support the Massachusetts communities that we are privileged to call our home. Sira Naturals' has embraced ancient philosopher *Maimonides'* famous *Eight Levels of Giving* as the model for our community investment strategy for people and communities disproportionately impacted by the War on Drugs. Under the *Eight Levels of Giving*, forming a partnership, giving a grant or finding a job for a person in need is the preferred vehicle for giving so long as the partnership, grant or job results in the person becoming self-sufficient. Sira's decision to unionize its workforce and its Accelerator program are examples of this category of giving. Sira's community investment strategy seeks to fund existing community organizations that are *trustworthy, wise, and can perform acts of giving in a most impeccable fashion*. The Community Action Agency of Somerville embodies this description.

- **Sira Accelerator**

Our comprehensive small business mentoring and advisory program is designed to leverage Sira Naturals' infrastructure by assisting small businesses entrepreneurs start cannabis businesses in retail sales, manufacturing or product development through Sira's retail and wholesale distribution network. The program seeks to level the playing field for small cannabis businesses in areas of disproportionate impact, economic empowerment and social justice.

In June 2018, Sira Naturals launched the Sira Accelerator, a small business advisory program designed to leverage the Sira Naturals infrastructure to help small cannabis businesses accelerate their product development cycle and get them to market through our retail and wholesale distribution network. This program provides material advantages, not just for applicants from areas of disproportionate impact, but for social justice applicants as well as smaller businesses generally, all of whom face sizable obstacles to getting started in the regulated cannabis industry. While the Sira Accelerator accepts applications from any small cannabis business, the program gives priority status in its application process to Economic Empowerment-eligible, social equity program-eligible, and women, minority and veteran owned businesses.

This market-based program serves as a model for other Marijuana Establishments in our combined effort to level the playing field for disproportionate impact, economic empowerment, social justice, and small businesses generally. Every participant has an incentive to ensure the success of these businesses.

- **Community Action Agency of Somerville (CAAS) Partnership**

The Community Action Agency of Somerville's work with housing, homelessness, and the Head Start program in Somerville and the Greater Boston area renders it a superb choice for Sira's sustained community investment. With a goal of becoming a model for non-profit partnerships benefitting communities impacted by the War on Drugs, Sira is partnering with CAAS to provide a Housing Counselor position for low-income residents facing eviction. The Counselor position costs \$67,000 per year for a 3-year term. The City of Somerville funds \$50,000 per year; Sira will fund

the remaining \$17,000 per year through 2021 to assist Somerville residents impacted by the vestiges of the War on Drugs. The Housing Counselor grant is the first of a sustained community investment in the work of CAAS. Sira looks forward to a substantive partnership with CAAS in collaboration with the City of Somerville as we continue to develop and implement our community investment strategy. (*Attachment 4 – Positive Impact Plan*)

In short, our stock swap with Ayr Strategies has made a substantial impact on our business by strengthening our diversity, workforce, and community investment efforts far beyond even our own expectations. By providing capital to expand the management team, Ayr is helping Sira improve its methodologies and implement innovative ways to achieve its diversity and positive impact goals. These strategic changes have allowed us to focus on what makes Sira Naturals a great company; our dedication to the values of sustainability, community and integrity – values that will help us achieve an equal level of success and community investment in the adult use market as we have in the medical market.

We are, by no means, finished with our community outreach and investment; in fact, we are just beginning. It is my responsibility at Sira Naturals—in alignment with our corporate vision—to ensure that our partner communities are truly engaged and benefitting from everything that makes us an exceptional local business. It is both my personal belief and professional goal to be an effective partner to help address the needs of the City of Somerville at every point throughout our long relationship.

As always, I as well as the other members of the leadership team at Sira Naturals, are happy to answer any questions or concerns that you have going forward. We are excited to continue to build upon our strong relationship with the City of Somerville and look forward to working with you productively throughout this application process.

Respectfully submitted,



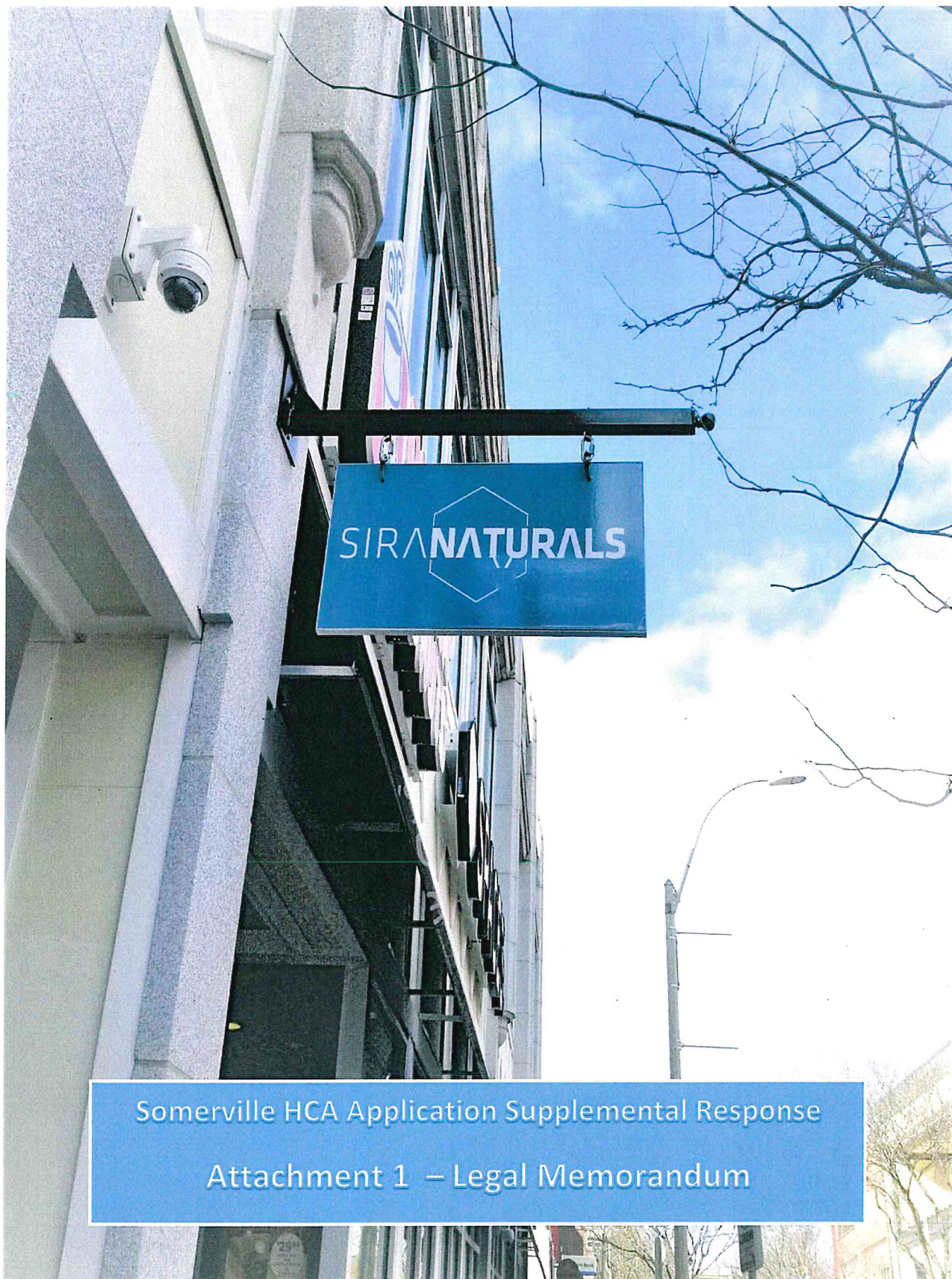
Dwan Packnett

VP Government Relations & Community Investment

cc: Louis Karger
David Rosenberg
Michael Dundas
Eric Wardrop
Jonathan Sandelman
Robert Edelstein

Attachments:

1. Legal Memorandum from David H. Rich, Esq. Todd & Weld, LLP
2. Organization Charts
3. Diversity Plan
4. Positive Impact Plan



Somerville HCA Application Supplemental Response
Attachment 1 – Legal Memorandum




Todd & Weld LLP

MEMORANDUM

To: Louis Karger
David Rosenberg
Michael Dundas
Eric Wardrop
Johnathan Sandelman
Robert Edelstein

cc: Dwan Packnett Esq.

From: David H. Rich, Esq. 

Dated: January 26, 2020

RE: City of Somerville / Sira Naturals, Inc.

On or about September 18, 2019, the City of Somerville's Marijuana Advisory Committee ("MAC") made a series of recommendations concerning a number of marijuana license applicants. With regard to Sira Naturals, Inc. ("Sira"), the MAC noted as follows:

The MAC is really concerned about recent news in the press about the company being sold to a large national company based in Canada. The scenario was presented to the MAC that it is just a new partner/shareholder rather than an acquisition of the whole company. The company will continue to be managed and operated locally. However, this is still unclear and may require a new HCA [Host Community Agreement] for the registered marijuana dispensary.

Out of an abundance of caution, Sira directed Todd & Weld LLP as its counsel to conduct a comprehensive review of the company, related transactions, federal, state or local filings, as well as pertinent state and municipal rules to determine whether any violation has occurred as it relates to Sira's existing host community agreement (HCA) or special permit. Accordingly, this memorandum is intended to memorialize for Sira, my firm's analysis of Sira in light of the MAC's concerns, the undertakings set forth in Sira's HCA and the applicable regulatory scheme which may impact upon the MAC's analysis. Todd and Weld LLP is informed that the contents of this memorandum may be shared with third parties. All other privileged information shared by and between Sira and Todd & Weld LLP shall remain protected by the attorney-client privilege.

Facts Relating To Sira's Recapitalization

In May of 2019, Sira underwent a recapitalization that affected how its equity was held, but did not in any way affect its operations or operational structure. Prior to the recapitalization,



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Sira's shares were held by two LLCs: Green Partners Investor, LLC and Green Partners Sponsor I, LLC. As a result of the recapitalization, Sira's shares are now held by C-SAC Acquisition, LLC. Sira's registration and Special Permit remained in the name of, and held by, Sira Naturals

Inc.¹ The only change to Sira's Board after the recapitalization was the addition of one additional board member. Sira's Executive Management Team has remained unchanged.

The Cannabis Control Commission ("CCC") requires prior approval for any changes in a Registered Marijuana Dispensary's ("RMD") officers, directors, or shareholders, which the CCC terms "change in ownership or control". Sira complied with this process and obtained the CCC's approval for the recapitalization on May 23, 2019.

Ordinance No. 2018-18

Ordinance No. 2018-18 is entitled, "An Ordinance Amending Chapter 9, Section 9-3(b) of the Somerville Code of Ordinances and Adding Section 2-221 To Chapter 2, Division 4 Regarding Adult Use Marijuana Establishments." Ordinance No. 2018-18 does not include any specific language limiting a license holder from recapitalizing its stock or from bringing on new shareholders or partners. Section H of the Ordinance does provide that "[a]ny license granted under this ordinance shall be a personal privilege and shall not be assignable or transferable."

Todd & Weld is unaware of any circumstances whereby Sira could be found to have transferred or assigned its license to another entity simply by recapitalizing its stock. No doubt countless companies who operate in Somerville under Special Permits or pursuant to similar municipal oversight have undergone stock recapitalization. We are unaware of the City of Somerville ever taking the position that a license had transferred where the underlying license or permit holder brought on new investors or recapitalized their stock. Accordingly, the Massachusetts Supreme Judicial Court has consistently held that a corporation, such as Sira, is a legal entity separate and distinct from its shareholders and that even the sale of all of an entity's stock does not constitute a transfer or assignment of a license or permit. For example, in Seagram Distillers Co. v. Alcoholic Beverages Control Commission, 401 Mass. 713, 719-720 (1988), the SJC held:

Seagram's argument assumes that a sale of stock in a corporate liquor wholesales constitutes a transfer of that corporation's license

¹ Sira's permit was actually issued in the name of Sage Cannabis, Inc. Sira has gone through a series of name changes resulting from concerns raised about Sage's name being too similar to other validly formed corporate entities. Specifically, in January, 2017, the company's name was changed from Sage Cannabis, Inc. to Sage Biotech, Inc. Three months later, in April, 2017, the name was changed to Sage Naturals, Inc. Finally, in November, 2017, the corporate name was changed for a final time to Sira Natural, Inc. All of these name changes were documented through proper filings (which remain publicly available) with the Corporations Division of the Massachusetts Secretary of State. Critically, Sira's name changes did nothing to modify the entity's corporate status, ownership or operational structure. By way of example, its tax identification number has remained unchanged.



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to sell liquor. The short answer to this assumption is that a sale of stock does not effect such a transfer ... It is a basic tenant that a corporation is a legal entity distinct from its shareholders.

Thus, Sira's recapitalization cannot be said to have run afoul of Section H of Ordinance No. 2018-18.

Host Community Agreement

On September 7, 2017, the City of Somerville and Sira Naturals, Inc. (which at the time was operating under the name Sage Naturals, Inc.) entered into a Host Community Agreement ("HCA"). The HCA has two provisions which bear on matters which may pertain to the MAC's analysis.

First, Section 15 of the HCA concerns dispute resolution. That provision provides that, "[i]f a dispute arises concerning the performance of either party hereunder, prior to resorting to court, the parties shall first provide notice to the other and shall meet and work in good faith either directly or with the assistance of a mutually-agreed third party to attempt to resolve their dispute in a prompt manner. If the dispute has not been resolved as aforesaid within ninety (90) days of its inception, either party shall be free to seek a judicial remedy."

Second, Section 9 of the HCA concerns the assignment of rights under the agreement. It provides that "[t]his covenant may be transferred by the Applicant [Sira] to a new RMD operator at the same location as the Applicant, but that new operator will need to secure a new or amended special permit from the special permit granting authority. If the Covenant transfers, all requirements of the Applicant shall be transferred to the new operator. The Parties shall be prohibited at all times from Assigning, in whole or in part, any portion of the Agreement without written consent of the other party." (emphasis supplied).

It is my understanding that neither Sira nor the City of Somerville have sought to exercise their rights under Section 15 of the HCA. In particular, it is my understanding that neither the Sira nor the City have sought at any time to initiate the dispute resolution procedure set out in Section 15 of the HCA. This fact strongly supports the conclusion that both Sira and the City agree that their counterparty to the HCA has acted in accordance with its terms since September 7, 2017.

In this regard, Section 9 of the HCA does not apply, concern or contemplate a situation where a license holder recapitalizes its stock. The language of Section 9 permits the assignment of rights under the HCA "to a new RMD operator at the same location as" Sira. Sira has been and remains the valid and appropriately licensed RMD operator at its Somerville site, 240 Elm Street—an undisputed fact reaffirmed continuously by the state's Department of Public Health and now the Cannabis Control Commission in its repeated issuance and re-issuance of certifications and licenses to the same corporate entity it has since June 27, 2014. Sira has never assigned or transferred any of its rights held under the HCA to any other entity. Moreover, there

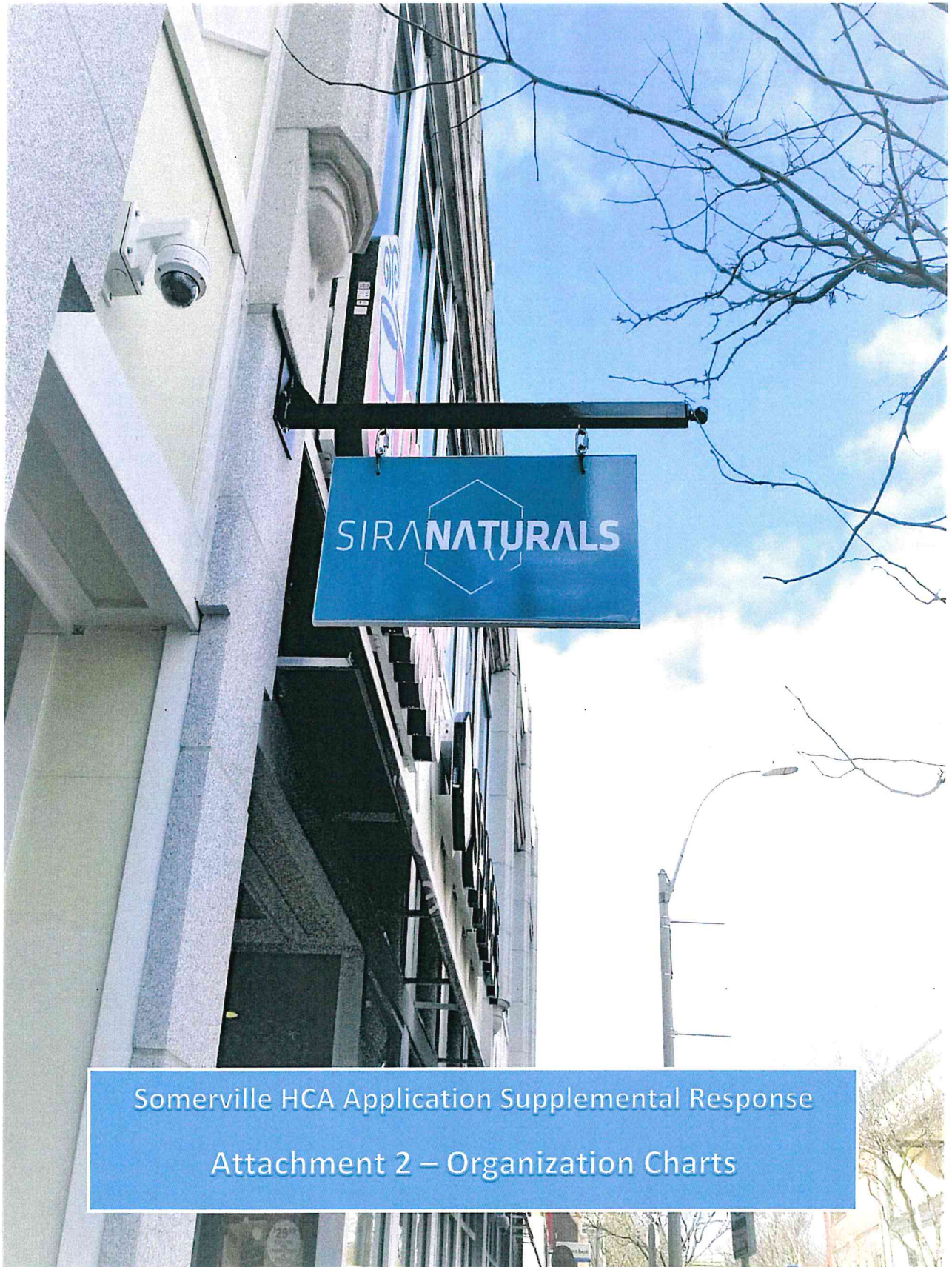


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is no “new RMD operator” operating from 240 Elm Street. The one and only RMD operator who has ever operated from 240 Elm Street is Sira. None of Sira’s shareholders, either before or after the recapitalization, have ever been licensed RMDs in Massachusetts. There is simply no basis to suggest that a recapitalization of Sira’s stock could ever be tantamount to assigning its rights under the HCA to a “new RMD operator” operating from 240 Elm Street. Thus, there is no requirement under the HCA for Sira to seek a new or amended special permit as a result of the recapitalization.

Conclusion

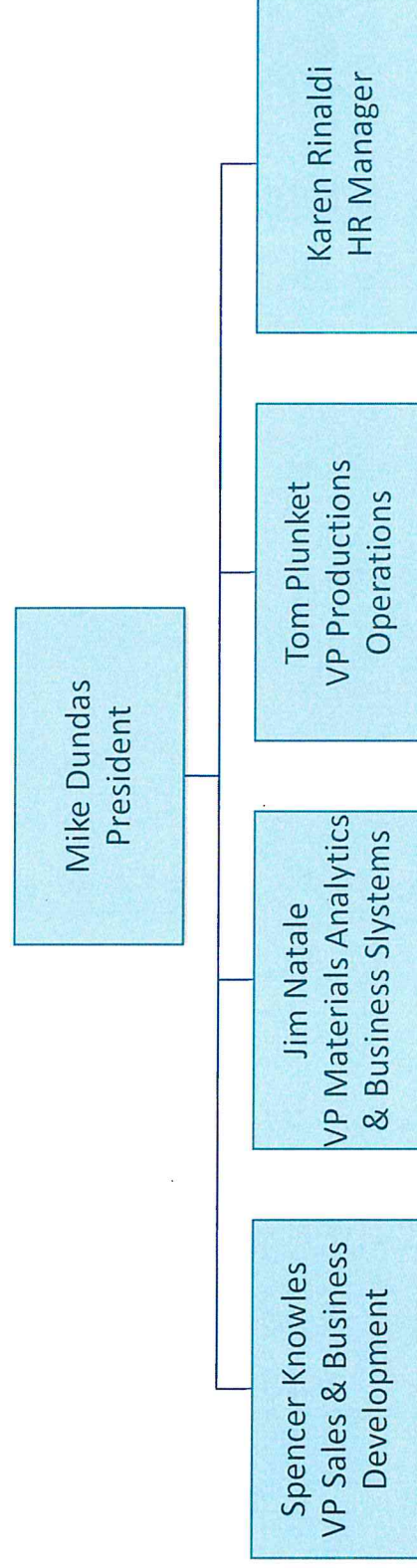
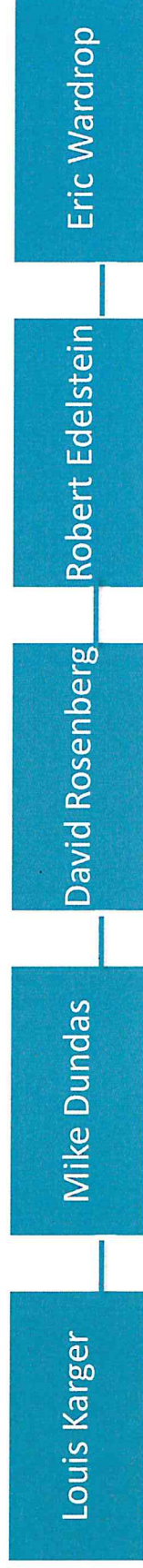
Based upon Todd & Weld’s review of the City of Somerville’s regulatory scheme governing marijuana businesses, as well as Sira’s Special Permit and its HCA, I have found no requirement which would require Sira to seek a new or amended special permit as part of its May, 2019 recapitalization. This is particularly the case where Sira has at all times been the lawful and licensed RMD operating from 240 Elm Street and where Sira’s executive management team did not materially change as a result of the recapitalization.



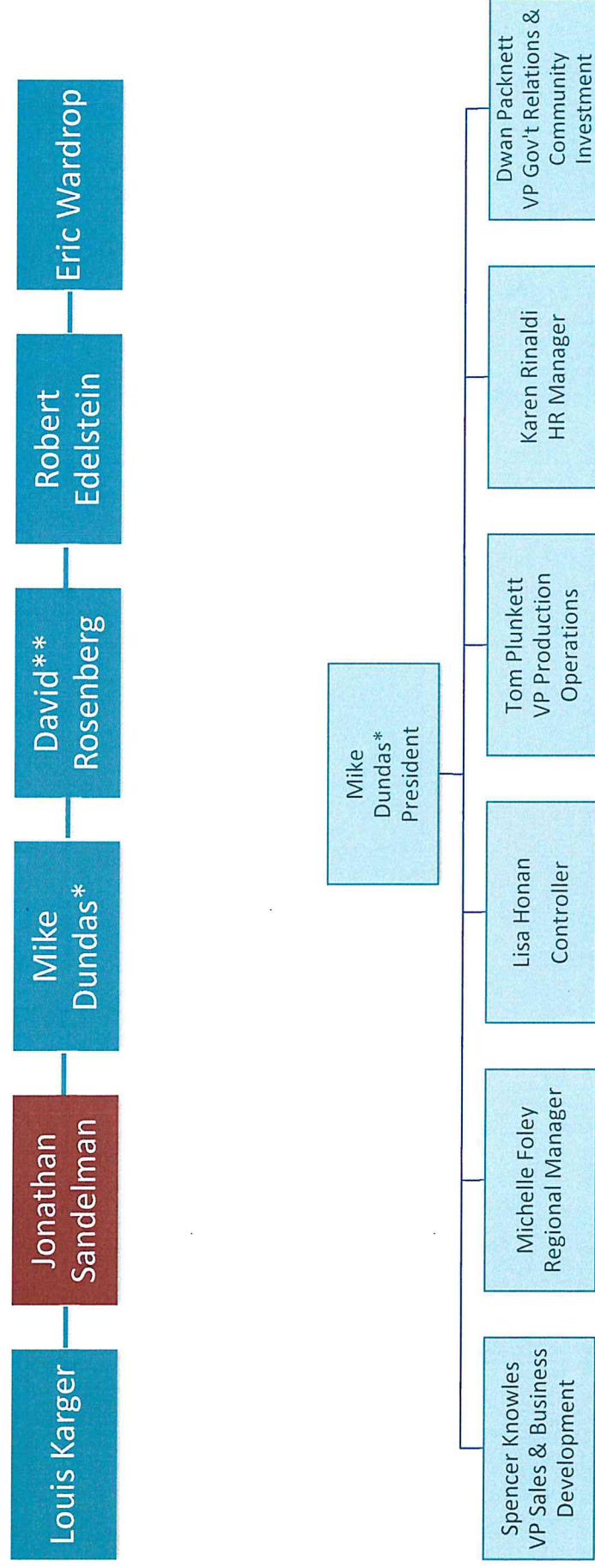
Somerville HCA Application Supplemental Response

Attachment 2 – Organization Charts

Sira Naturals, Inc.
Board of Directors and Executive Team
June 2019 Pre-Stock Swap



Sira Naturals, Inc.
Board of Directors and Executive Team
February 2020 Post-Stock Swap



* **Mike Dundas** is an original employee of Sira Naturals, Inc. for personal reasons and as Sira evolves, Mike is voluntarily retiring and will be stepping down as a Board Member and President, effective March 31, 2020.

A Sira Naturals' founder, **David Rosenberg, a 4-year veteran of the Sira Board, is transitioning as Sira's President and CEO effective April 1, 2020. David brings a long and storied career running successful New England companies. Among many other accolades, David was recently awarded the Boston Business Journal's 2019 CEO Social Leadership Award given to the regional executive who has gone above and beyond to innovate and create solutions to the area's biggest community challenges. Sira is thrilled to welcome David who embodies Sira's priorities of family, community, and a commitment to equity and excellence.





DIVERSITY PLAN

Introduction

This Diversity Plan outlines our goals in promoting equity and inclusion in the operation of our organization. This plan specifies actions we will take to further our equity and inclusion goals and to promote a healthy and productive workplace environment. Sira Naturals, Inc. fosters a company culture centered on sound business principles, mutual respect, equity, parity, inclusion, and open communication, with an emphasis on excellence in personal contribution to company objectives. The centerpiece of the Sira Naturals Diversity Plan is our program, *"There's a place for You in the Cannabis Industry"*, which is an innovative program to expand the pool of candidates. A second component of our efforts to create and maintain a diverse and inclusive workforce is through the unionization of our workforce. The third component of our plan is our ongoing HR practices that are designed to support a culture of continual improvement in the area of diversity, equity and inclusion



Sira Naturals' Somerville Dispensary 240 Elm Street in Davis Square

Sira Naturals' Current Employee Composition

Today Sira Naturals employs 191 people in four facilities (two retail facilities in Needham and Somerville; a production facility in Milford; and corporate headquarters in Woburn.) Table 1, below presents current demographic data for 2019, by three employment actions (i.e., hires, promotions, terminations.) We compare the demographic profile at Sira Naturals with that for the Commonwealth's work-age (age 20-65) population. The data in Table 1, indicate that, when using the statewide working-age population as a benchmark, we are slightly underperforming. For example, when using the (imperfect) benchmark of statewide data for 2016, Sira Naturals' hires for 2019 were 78% of all hires, as compared to 74% of the Commonwealth's work-age population. Conversely, 22% our hires were non-white, as compared to the 25% of the Commonwealth's working-age population. In the same vein, of our 2019 hires, 58% were male and 42% were female. We offer these data as a baseline in order to both create corporate goals and to measure our progress. For 2020, Sira Naturals is targeting a goal of 30% minority representation in all its facilities.

Table 1. *Sira Naturals employee demographics, by employment action, 2019.*

	White non-Hispanic (74% of Mass work-age population, 2016)	Black, Asian, Hispanic, Native American (26% of Mass work-age population, 2016)
Hires	78%	22%
Promotions	77%	23%
Terminations	72%	28%
	Male (49% of Mass work-age population, 2016)	Female (51% of Mass work-age population, 2016)
Hires	58%	42%
Promotions	65%	35%
Terminations	66%	35%
	Non-disabled	Disabled
Hires	83%	17%
Promotions	98%	2%
Terminations	83%	17%

Source: Sira Naturals for company data; Massachusetts population based on: National Center for Health Statistics. Postcensal estimates of the resident population of the United States for July 1, 2010-July 1, 2016, by year, county, single-year of age (0, 1, 2, ..., 85 years and over), bridged race, Hispanic origin, and sex (Vintage 2016). Accessed from mass.gov: <https://www.mass.gov/service-details/population-information> Accessed 1/22/2020

There's a Place for You in the Cannabis Industry

Sira Naturals commissioned a four-part introduction to the cannabis industry. We are in discussion now with the Workforce Development Department in Somerville and the Community Policing Unit in Boston to create community partnerships for delivering this training. Our intention is that we will offer the training in designated areas of disproportionate impact with a trusted provider of workforce development

training and information. In addition, we will work with advocates working to expand workforce opportunities for those with a range of abilities, and advocates working to expand workforce opportunities for veterans. The learning objectives for the four-part training include:

Goals

- 1) Introduce those who live in areas of disproportionate impact to the cannabis industry.
- 2) Provide overview of the cannabis industry in Massachusetts
- 3) Provide information of what it is like to work in a regulated industry
- 4) Introduction to the plant and products
- 5) Introduction to METRC™, what it is and why it is used
- 6) Introduction to range of jobs available in different segments of today's industry (e.g., general and admin; cultivation; manufacturing; retail); the entry-level requirements for each; the expected salary ranges; the typical benefits; opportunities for advancement.
- 7) Introduction to the state regulations that pertain to those in the industry (e.g., background checks; responsible vendor training certification)
- 8) Overview of current job openings at Sira Naturals, and other resources for finding opportunities in the emerging industry.

We expect to offer the first training in the first half of 2020.

Measurement

Our evaluation of *There's a Place for You in the Cannabis Industry* has two components. The first component is that each of the four modules ends with a participant evaluation of the session. We will use these evaluations to make improvements in the training experience. The second evaluation component has to do with if this training program is successful in expanding the diversity of applicant pool. We will be successful if the composition of our applicant pool with respect to racial and ethnic minorities, veterans, and those of all abilities, meets or exceeds their representation in the workforce of the Commonwealth as a whole.

Unionization

Sira Naturals is in the final stages of the employee/member ratification process for its Collective Bargaining Agreement (CBA) with United Food and Commercial Workers (UFCW Local 1445.) With the implementation of the Union's *Diversity Plan for Equitable Opportunities in the Cannabis/Marijuana Business and Cannabis Industry Apprenticeship Program*, through employer contributions to a Joint labor Management Apprenticeship Fund, Sira Naturals will work closely with Local 1445 to meet and exceed its diversity and inclusion hiring goals.

Some of the elements of this collective bargaining agreement that will contribute to a diverse and inclusive workplace include:

1. When new or additional employees are needed, Sira Naturals will notify the UFCW Apprenticeship Board. This will enable the UFCW to refer applicants to Sira Naturals.
2. When a job vacancy or new job opening occurs at a location, Sira Naturals will post the opening according to Union rules (including location, shift, pay range, and department) and announce by email to all employees at the location. We hold the job open for seventy-two (72) hours. All job

bids will be determined on the basis of seniority, training, education, qualifications, skill, ability, performance, and disciplinary history. Where these factors are equal between or among candidates, seniority shall prevail.

3. Sira Naturals will comply with the terms of all federal and state laws regarding military leave and reemployment. Furthermore, when a Sira Naturals employee who is a reservist in the U.S. Armed Forces is activated for deployment, we will pay the difference between the gross amounts received by the employee from the United States for their active duty military service, including all housing, subsistence, hazard pay, and other compensation, and the employee's regular rate of pay for a period of up to six (6) months, excluding required annual active duty in connection with an employee's regular obligations as a reservist.
4. Sira Naturals will grant family and medical leaves of absence in conformity with the FMLA and State leave laws. Sira Naturals employees may use earned time off (ETO) for the care of sick children, parents, or spouses, in addition to personal medical reasons.
5. An employee with at least one year of continuous employment shall be eligible for up to four weeks of paid parental leave, on the birth or adoption of a child.
6. Sira Naturals will regularly review and evaluate recruitment, development, and retention practices to ensure barriers to employment are identified and addressed.
7. Sira Naturals will provide internship, shadowing, coaching, and mentoring opportunities across the organization.
8. Sira Naturals will execute a communications plan that increases employee awareness of diversity and inclusion.
9. Sira Naturals will use employee surveys to support our work in identifying barriers to diversity, equity, and inclusion.

Measurement

Beyond expanding the pool of applicants to more closely reflect the demographic composition of the Commonwealth, partnership with UFCW Local 1445, will support our efforts in achieving workforce equity after hiring. That is, currently non-white workers are overrepresented in terminations; men are overrepresented in hires and promotions; and differently abled employees are underrepresented in promotions (see Table 1.) Through our partnership with UFCW Local 1445, we expect to reduce this disparity. By tracking these numbers on an annual basis we will be able to monitor our progress towards this goal.

HR Practices to Support a Culture of Continual Improvement With Respect to Diversity, Equity, and Inclusion

The following practices are part of the daily work of our human resources (HR) department. By their nature these practices include measurement, therefore we do not report on measurement separately. These practices include:

1. MEPA (MA Equal Pay Act) Audit. Sira is conducting a self-audit of payroll practices across all departments to ensure pay equity by gender for comparable roles.
2. Diversity and Inclusion (D&I) Seminars and networking. HR conducts annual D&I meetups, seminars, or other outreach initiatives to provide ongoing learning and development in the area of D&I.
3. Expand recruiting efforts to increase diversity in applicant pool. Currently we recruit from the following D&I websites: Diversity.com, PDN Recruits, iHispano, Black Career Network, Black Jobs, Hispanic/Latino Professionals Association (HLP), FairyGodBoss, PowerToFly, Career Contessa, Female Executive Search, Pink Jobs, Campus Pride, Out & Equal, RetiredBrains, WorkForce50, Recruit Disability, AbilityLinks, VetJobs, HireDiversity, RecruitMilitary.¹ In addition, Sira's regular HR practices include: having employees from diverse backgrounds meet with potential candidates during the hiring process, including people who represent the identities of interviewees; clearly communicating accommodation practices (e.g., ADA compliant, all-gender restrooms, childcare coverage throughout job listings and to new hires; regular review of job descriptions for inclusive language).
4. Expand practices that are aimed at mitigating unconscious biases, such as standardizing the interview process to include standardized questions and a standardized script in all interviews, and consistent scaling to evaluate all candidates.
5. Annual employee surveys to check our corporate climate. In part, this survey is meant to support our work in creating a culture where every individual can contribute their full potential. Our commitment is to investigate the systems and processes at Sira in order to uncover sore spots and blind spots, and then find ways to reimagine them

¹ <https://breezy.hr/blog/top-20-job-boards-diversity-hiring>



Somerville HCA Application Supplemental Response

Attachment 4 – Positive Impact Plan



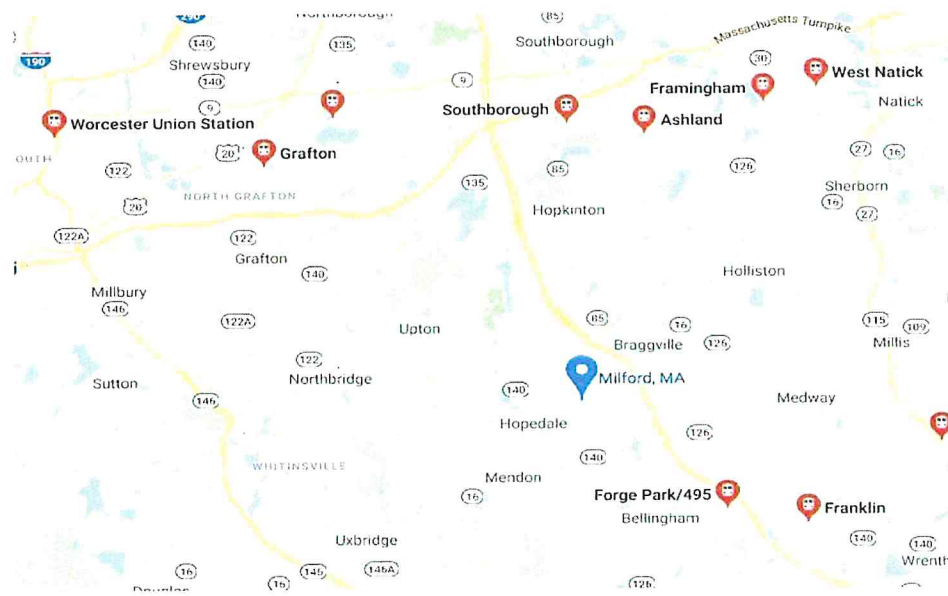
POSITIVE IMPACT PLAN

Sira Naturals' positive impact goals are focused on two significant areas of disparity in the Cannabis Industry, as identified in the Cannabis Control Commissions impact goals.

Our first goal is focused on reducing barriers to entry in the commercial adult-use cannabis industry. In order to achieve this, our Positive Impact Plan consists of a two part strategy: Addressing the transportation barrier that many potential employees face in getting to work at Sira Naturals' facilities and dedicating our own resources to reducing barriers to employment for those formerly incarcerated by expunging court records in appropriate cases.

The second, and equally important impact goal, is to provide the necessary assistance to non-profit agencies whose mission is to support individuals who have been negatively impacted by prior cannabis public policy and the War on Drugs.

Figure 1. *Sira Naturals' Milford facility is in a "public transportation desert"*



Source: Google maps (accessed January 31, 2019)

Transportation

Currently, Sira Naturals operates at four sites: our corporate headquarters in Woburn; two retail facilities in Needham and Somerville; and our production facility in Milford. We have submitted an application for a third retail outlet in Boston. Our Milford facility has seen significant growth; in fact, we have added an additional shift there.

However, for those without a car, seeking employment in our Milford facility, is a challenge. There are transportation challenges associated with our Needham facility; however, they are somewhat less extreme. In Table 1, below is a listing of the 29 areas of disproportionate impact designated by the CCC. Next to each city, is the estimated evening travel time to Sira Naturals' Milford facility. The time ranges from a low of thirty minutes from Mansfield to a high of over 2 hours from North Adams. For 16 of these cities, evening travel time is 60 minutes or less. These are the communities for which it makes the most sense for Sira Naturals to focus on its recruitment efforts with respect to the Milford facility, in order to have a positive impact on areas of disproportionate impact.

Table 1. *Twenty-nine areas of disproportionate impact and estimated evening travel time by car to Sira Naturals' Milford facility. (Highlighted cities are those where the evening commute is 1 hour or less.)*

City	Travel time (minutes) to Milford	City	Travel time (minutes) to Milford
Abington	60	New Bedford	60
Amherst	90	North Adams	150
Boston	90	Pittsfield	120
Braintree	60	Quincy	70
Brockton	60	Randolph	55
Chelsea	90	Revere	80
Fall River	60	Southbridge	55
Fitchburg	60	Spencer	55
Greenfield	110	Springfield	80
Haverhill	80	Taunton	45
Holyoke	80	Walpole	35
Lowell	55	Wareham	55
Lynn	100	West Springfield	80
Mansfield	30	Worcester	40
Monson	60		

Source: Own calculations based on Google maps (accessed January 28, 2020)

The data presented in Table 1 are an estimate; yet, they give us confidence that we can have meaningful impact in the designated cities of disproportionate impact, when we are focused in our recruitment strategies. Beyond recruitment, however, transportation is a real and perceived barrier. Therefore, we propose to contract for a **Transportation Barrier and Remedy Study**. We expect that such a study will require an assessment of the possible strategies that Sira Naturals can use to recruit from areas of disproportionate impact where commuting to work is a challenge. We expect that our Transportation Barrier and Remedy Study will require some creative solutions such as carpooling, hiring vans for dedicated routes, facilitating car loans, working with other employers, or other innovative approaches. We expect to commission this study in 2020 and craft our program in time for 2021 implementation.

Measurement

Part of the feasibility study will include a monitoring and evaluation plan. This M&E plan would allow Sira Naturals to assess the impact of new transportation programs on expanding hires from the CCC-designated impacted communities, as well as identify opportunities to improve and expand the program.



Similar use

Cannabis use, for most groups, is about 6-12% of population

	Men	Women
White (non-Hispanic)	11.0%	6.7%
Black (non-Hispanic)	8.0%	7.7%
Hispanic	8.9%	9.2%
Asian/Pacific Islander	7.7%	2.0%

Dis-similar impact

Arrest rates in 2010, were almost 4 times higher for Blacks than Whites

	Black	White
Arrests per 100,000 of population	716	192



Source: "There is a Place for You in the Cannabis Business" Module 1 (January 2020)



Expunging court records

One challenge for the Massachusetts cannabis industry is to balance regulatory needs with remediating the negative effects of the war on drugs. One place where this challenge presents, is with background checks. The CCC "cradle to grave" background requirement creates a barrier for some potential workers who have served time, paid their debt to society, been rehabilitated, and are ready to participate in a legal industry. Sira is working with the CCC to consider the convicting offense and time frame proximity to provide job applicants a 2nd chance if their offense was more than 10 years ago. To this end, Sira will work with Operation Exit and Mass CultivatED to have CORI records expunged and sealed, for otherwise eligible job applicants.

The mission of the CultivatED Program is to empower, educate, and employ individuals from areas of disproportionate impact, as identified by the Massachusetts Cannabis Control Commission, who have been harmed by the War on Drugs. The CultivatED Program collaborates with Institutional Partners, Founder's Circle benefactors, and Program Members in order to create a fellowship program to provide selected fellows with individualized pro-bono legal services, background checks, suitability support services, a fully funded certificate program of higher education, placement in a paid and fully benefitted co-operative learning position, an externship program for educational credit hours, and support for job placement upon successful completion of CultivatED's fellowship program. CultivatED's goal is to successfully expand these objectives to encompass a fully accredited associate degree-issuing program recognized and provided on a statewide basis by CultivatED and the Commonwealth's 15 accredited community colleges.

The Institutional Partners of CultivatED are Roxbury Community College, Roxbury Community College Foundation, Greater Boston Legal Services, the Urban League of Eastern Massachusetts, the Massachusetts Association of Community Colleges, and Lawyers for Civil Rights (Boston). Sira Naturals is one of four members of Mass CultivatED's Founder's Circle. As a member of the Founder's Circle, Sira

Naturals has pledged an annual contribution of at least \$25,000.

Measurement

Sira Naturals will maintain a count of employees who have had CORI records expunged and sealed by working with Operation Exit and Mass CultivatED. Beginning in 2021 we will conduct an annual program evaluation of this initiative. Among the elements of this initiative that we will evaluate the number of people seeking the sealing and expungement of their records; number who successfully had records sealed and expunged; number hired; number promoted; number terminated. The evaluation will also identify areas where we can improve outcomes for this initiative.

Community Action Agency of Somerville (CAAS)

Sira Naturals' has embraced ancient philosopher *Maimonides'* famous *Eight Levels of Giving* as model for our community investment strategy for people and communities disproportionately impacted by the War on Drugs. Incorporating Level 2 of the *Eight Levels of Giving* into our investment strategy Sira seeks to *give funds to an unknown recipient via a public source which is trust-worthy, wise, and can perform acts of giving in a most impeccable fashion*. The Community Action Agency of Somerville's work with housing, homelessness and the Head Start program in Somerville and the Greater Boston area renders it a superb public source for Sira's sustained community investment.

CAAS' mission is to reduce poverty among local families and individuals while working to counteract – and whenever possible, eliminate – the societal conditions that cause and perpetuate poverty. CAAS has been the federally designated anti-poverty agency serving Somerville since 1981. With Community Services Block Grant (CSBG) funding, CAAS commenced to address issues facing low-income, local residents, with a focus on eviction prevention and housing equity. For the past 38 years, CAAS has equipped low-income residents of Somerville with the tools and potential for becoming self-sufficient and economically secure.

CAAS programs include Head Start, Tenant Organizing & Advocacy, Volunteer Income Tax Assistance, and the Homelessness Prevention Program. Sira is partnering with CAAS to provide a Housing Counselor position for the Homelessness Prevention Program. The Counselor position costs \$67,000 per year for a 3-year term. The City of Somerville funds \$50,000 per year; Sira will fund the remaining \$17,000 per year through 2021 to assist Somerville residents impacted by the vestiges of the War on Drugs. The combination of the Sira's grant with the Somerville grant enables CAAS to hire a full-time staff person to focus solely on housing search and stabilization – two services where CAAS clients nearly always need help – to ensure Somerville families are able to navigate the difficult situation of limited housing supply and the stress of housing instability.

The Homelessness Prevention Program (HPP) works with an average of 450 families and individuals each year with a focus on providing a wide range of services to low-income individuals at risk of homelessness, including preventing evictions through advocacy with landlords and in district court and maximizing income by improving access to public benefits. Case management targeting the root causes of housing affordability helps prevent future crisis. Often the root cause of housing affordability for many low-income families can result from becoming entrenched in a judicial system requiring significant financial expenditure to respond to an arrest, even without conviction; or the devastating financial impact for families left behind during the incarceration of a formerly "income earning" parent, child or family member. HPP has one major funding source, the Community Service Block Grant (CSBG) administered by the Massachusetts Department of Housing and Community Development. Services provided under the CSBG contract are restricted to Somerville residents with income at or below 125% of the federal poverty level. CAAS also has a Housing Stability Program funded by the City's Affordable Housing Trust Fund, to

assist families who are at or below 80% AMI stay in Somerville by helping with move-in costs or rental arrearages.

The Housing Counselor must provide individualized, intensive, trauma-informed, direct assistance to clients in identifying and pursuing housing options; Advocacy and support in addressing barriers to lease-up, including applications for financial resources to cure outstanding rent or utility arrearages, assistance addressing other credit problems and assistance addressing barriers to positive landlord references; Assisting tenants with accessing clinical, representative payee or other support services that may be necessary to support requests for reasonable accommodation related to housing stability or access; and individualized stabilization services that shall include at least monthly communication with a client for a minimum of three months after obtaining housing and quarterly thereafter for a period of totaling twelve months.

Measurement

The CAAS Housing Counselor started working in November 2019. The expectation is that the Housing Counselor will maintain an average caseload of 20 -30 active cases. Included in this caseload are 1) families actively looking for housing and/or addressing matters pertinent to their ability to obtain and maintain housing and in regular contact with CAAS staff to report their progress or to access assistance with housing search or related activities; 2) families successfully housed within the past three months and receiving stabilization services; and 3) families successfully housed within the past twelve months and determined to be in need of, and continuing to receive, stabilization services above and beyond the standard quarterly contacts in order to retain their housing in accordance with approved OHS service plan. Sira will conduct an annual evaluation of this program in January 2021.

Sira AMEND

AMEND – “To change or modify for the better,” to make minor changes in order to make something fairer

Sira AMEND - *An investment in people and place to counteract disparate treatment by ensuring those most impacted by disparity have full access and a means of entry into the Cannabis industry.*

Massachusetts’ groundbreaking Cannabis legislation seeks to make amends for the historical restricting of access to business ownership for many people of color in the Commonwealth. The Cannabis Control Commission’s Equity Empowerment and Social Justice programs present a laudable first step towards equity and access for people of color to enter the Cannabis industry. But disparate treatment has been ongoing as a result of race, national origin or religion in the United States, most particularly Americans of African slave descent, and will not be erased by one industry – no matter how lucrative or innovative. Despite the attention the Cannabis industry receives it is but one industry in the United States economy and, therefore, may be more useful as a template for creating methodologies for counteracting disparate treatment that can lead to industry access for people of color. Through community investment and tailored programs to people disproportionately impacted by the War on Drugs, Sira Naturals aspires to be a leader in this effort.

Sira Amend: Cannabis 101 – “There is a Place for You in the Cannabis industry!”

Program Concept – Our first Sira AMEND program is designed for: Cannabis Information and training modules for aspiring cannabis entrepreneurs seeking to open a recreational facility in Massachusetts; Investors and community members seeking information about economic development opportunities and

jobs community based, women and/or minority owned businesses. The Cannabis 101 modules shall include technical and practical information and, when taken together, provide a comprehensive exploration of opening a Retail Cannabis facility in MA. Classes will be held in impacted communities. For more information, please see *Attachment 3 -Diversity Plan*.

Measurement

Sira will create a campaign for out this outreach program with the intention of following up with participants to better understand who is attending and their interests in the Cannabis industry; and connecting them to additional resources and job opportunities based on their preferences and interest. It is our intention, to remain connected to each impacted community we visit with follow-up classes, training and resources.

Sira Accelerator

A comprehensive small business mentoring and advisory program designed to leverage Sira Naturals' infrastructure to assist small businesses entrepreneurs start Cannabis businesses in retail sales, manufacturing or product development through Sira's retail and wholesale distribution network. The program seeks to level the playing field for small Cannabis businesses in areas of disproportionate impact, economic empowerment and social justice.

In June 2018, Sira Naturals launched the Sira Accelerator, a small business advisory program designed to leverage the Sira Naturals infrastructure to help small cannabis businesses accelerate their product development cycle and get them to market through our retail and wholesale distribution network. This program provides material advantages, not just for applicants from areas of disproportionate impact, but for social justice applicants as well as smaller businesses generally, all of whom face sizable obstacles to getting started in the regulated cannabis industry. While the Sira Accelerator accepts applications from any small cannabis business, the program gives priority status in its application process to Economic Empowerment-eligible, social equity program-eligible, and women, minority and veteran owned businesses.

This market-based program serves as a model for other Marijuana Establishments in our combined effort to level the playing field for disproportionate impact, economic empowerment, social justice, and small businesses generally. Every participant has an incentive to ensure the success of these businesses.

Sira Naturals does its best work in areas where it has developed a core competency. As one of the largest RMD groups in the Commonwealth, and one of the few with experience dating back to 2013, Sira can share this experience inform and assist potential cannabis license applicants with a variety of issues surrounding licensing, compliance, local outreach and zoning, as well as product development and operations. Sira Naturals leverages this experience to assist these aspiring organizations learn how to successfully build and operate a cannabis business in Massachusetts.

Measurement

In February 2020, Sira will be welcoming two new Economic Development hoping to open Retail adult use facilities in Cambridge and Boston to the Accelerator program. In the past, the Accelerator program worked with production and manufacturing applicants. Measurements and goals for this new phase of Accelerator will follow on or before March 31, 2020.