Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Healthy Pharms, Inc.
0154-COO-03-0921

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

   Healthy Pharms, Inc.

License Number	License Type
MC281631	Cultivation
MP281450	Product Manufacturing
MR281754	Retail
MTC285	Medical Marijuana Treatment Center
MTC545	Medical Marijuana Treatment Center

2. The licensee has paid the applicable fees for this change request.

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Kathi Lentzsch	Person with Direct or Indirect Control
David Daily	Person with Direct or Indirect Control
Eric Rey	Person with Direct or Indirect Control
Roman Tkachenko	Person with Direct or Indirect Control
Chetan Gulati	Person with Direct or Indirect Control
Leonid Gontmakher	Person with Direct or Indirect Control
Joseph Feltham	Person with Direct or Indirect Control
Andrew Thut	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
4Front Ventures Corp.	Entity with Direct or Indirect Control
4Front U.S. Holdings, Inc.	Entity with Direct or Indirect Control

5. Background checks were conducted on all proposed parties and no suitability issues were discovered.

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

7. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff 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.
8. To help ensure compliance with 500.101 & 501.101(a)(11), it is strongly recommended that an update be provided to the Commission within 90 days of the approval of the change of ownership, regarding any changes or modifications to your Diversity Plan and/or Positive Impact Plan, including but not limited to goals, programs, measurements and accountability as a result of the Change of Ownership.