

LIBERTY COMPASSION, INC.

ESTABLISHMENT OVERVIEW

1. Name, license number(s), and types of license(s) affected by the change in ownership and control request:

Liberty Compassion, Inc.
MTC1586
RMD1465
MC282178 (Cultivation)
MP281752 (Product Manufacturing)

BACKGROUND OVERVIEW

2. The individual(s) requesting to acquire ownership or control interests over the license(s) include the following:

Individual	Role
Benjamin Kovler	President, CEO, Secretary and Director of Affinity; Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.; Chairman and CEO Green Thumb Industries Inc.
Anthony Georgiadis	CFO and Treasurer of Affinity; Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.; CFO and Director of Green Thumb Industries Inc.
Andrew Grossman	Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.
William Gruver	Director of Green Thumb Industries Inc.
Wendy Berger	Director of Green Thumb Industries Inc.
Glen Senk	Director of Green Thumb Industries Inc.
Westley Moore	Director of Green Thumb Industries Inc.

3. The entity(ies) requesting to acquire ownership or control interests over the license(s) include the following:

Entity	Role
GTI Core, LLC	Sole shareholder of Affinity



VCP23, Inc.	Sole member of GTI Core, LLC
GTI23, Inc.	Sole member of VCP23, LLC
Green Thumb Industries Inc.	Sole shareholder of GTI23, Inc.

4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals and entities that are requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entities associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

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 license change.
2. The licensee shall notify the Commission when the change has occurred.
3. If following this change approval the name of the business will be modified, the licensee shall complete a change of name request.
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.

