

**SIRA NATURALS, INC.**  
MC281252; MP281303; MX281310  
RMD-245; RMD-325; RMD-625

**ESTABLISHMENT OVERVIEW**

1. Name, license numbers, and types of licenses affected by the change in ownership and control request:

SIRA Naturals, Inc.

MC281252 – Cultivation (Tier 3 / Indoor)

MP281303 – Product Manufacturing

MX281310 – Transportation

RMD-245

RMD-325

RMD-625

**BACKGROUND OVERVIEW**

2. The individuals requesting to acquire ownership or control interests over the licenses include the following:

Jonathan Sandelman - Director

Jennifer Drake – Chief Operating Officer

Mark Smith – Treasurer

Charles Miles - Director

Steve Menzies - Director

Mark Pitchford - Director

Chris Burggraevae - Director

Carmelo Marrelli – Chief Financial Officer

3. The entities requesting to acquire ownership or control interests over the licenses include the following:

CSAC Acquisition, Inc:

Owner of SIRA Naturals, Inc.

CSAC Holdings, Inc.:

Change in Ownership and Control Executive Summary 1



Holder of 100% of the voting control and majority ownership in CSAC Acquisition, Inc.  
Cannabis Strategies Acquisition Corp. (CSAC):  
Holder of 100% of the control and equity of CSAC Holdings, Inc.  
Mercer Park CB, L.P.:  
Holder of 10% of CSAC ownership and 63% of CSAC voting interest.  
Mercer Park CB GP, LLC:  
Sole general partner of Mercer Park CB, L.P.

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 licenses 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 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 the individuals/entities associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105 (1) after effectuating the change in ownership and control, 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.

