

HEALTHY PHARMS, INC.

MRN281754

MPN281450

MCN281631

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Healthy Pharms, Inc.
401 E. Main Street, Georgetown, MA 01833

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

Retail
Product Manufacturing
Cultivation – Tier 4 (20,001 to 30,000 sq. ft) / Indoor

3. Applicant is a licensee or applicant for other Marijuana Establishment license(s):

The applicant is not an applicant or licensee for any other Marijuana Establishment license.

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

Leise Rosman — Executive/Officer
Andrew Thut — Executive/Officer
Nathaniel Averill — Manager
Cory Ravelson — Manager
Gary Schepis — Manager
Nicolas Robertson — Manager
Josh Rosen — Close Associate

5. List of all required entities and their roles in the Marijuana Establishment:

Mission Partners USA, LLC — Owns and controls 100% of the voting rights of Healthy Pharms, Inc.

4Front Holdings, LLC — Parent company of Mission Partners USA, LLC.
Provisional License Executive Summary 1



6. Applicant's priority status and information pertaining to co-located operations:

RMD Priority (RP201901)

The RMD business will be co-located with the adult-use business in Georgetown. The RMD has a Final Certificate of Registration for dispensing, cultivation, and processing.

7. The applicant and municipality executed a Host Community Agreement on July 16, 2018.
8. The applicant conducted a community outreach meeting on July 11, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on February 26, 2018 stating the applicant was in compliance with all local ordinances and bylaws.
10. The applicant proposed the following programs for its Positive Impact Plan:
 - a. Conduct at least two (2) industry-specific seminars annually;
 - b. Institute hiring practices that prioritize hiring of individuals from Haverhill; and
 - c. Host in-store donation drives quarterly to benefit Haverhill-based charities.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within two (2) months of provisional licensure.
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 11:00 a.m. – 7:00 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 programs for its Diversity Plan:

- a. Participate in career fairs in underrepresented and minority communities;
- b. Provide cultural training on cultural sensitivity and recognizing unconscious bias; and
- c. Utilize suppliers who are committed to diversity and inclusion.

17. Summary of cultivation plan (if applicable):

The applicant submitted a detailed cultivation plan that demonstrated the ability to comply with the Commission's regulations.

18. Summary of products to be produced and/or sold (if applicable):

- a. Dissolving tablets and strips;
- b. Tinctures;
- c. Nasal/oral sprays;
- d. Suppositories;
- e. Oils;
- f. Waxes;
- g. Shatters;
- h. Budders;
- i. Live resins;
- j. Saps;
- k. Taffies;
- l. Crumbles;
- m. Moon rocks;
- n. Creams;
- o. Salves;
- p. Lotions;
- q. Body butters;
- r. Topicals;
- s. Dermal patches;
- t. Capsules;
- u. Cooking oils;
- v. Beverages;
- w. Sauces;
- x. Dips;
- y. Baked goods;
- z. Confections;
- aa. Chocolates;
- bb. Candies;
- cc. Gums;
- dd. Sugars;
- ee. Salts;



- ff. Syrups;
- gg. Butters;
- hh. Mints; and
- ii. Tea.

19. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant is a vertically integrated RMD that has applied for adult-use cultivation and product manufacturing licenses. The applicant plans to provide its own marijuana products.

20. ISO 17025 Certifying Body and Certificate Number (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. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and
5. Final licensure is subject to submission by the applicant of additional information about the products anticipated to be produced, including the types, flavors and forms of the following products: beverages; sauces; baked goods; confections; and candies (applies to MPN281450).

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.

