Mission Massachusetts, Inc.
369 Elm Street
Concord, MA 01742

February 23, 2016

Massachusetts Department of Public Health
Medical Use of Marijuana Program
RMD Applications
99 Chauncy Street, 11th Floor
Boston, MA 02111

Re: Request for Information – Mission Massachusetts, Inc., Management and Operations Profile
(Applications 1 of 3, 2 of 3, and 3 of 3)

To Whom It May Concern:

Please find attached our complete responses to the Department’s requests for additional information, as they pertain to our Management and Operations Profile submission.

Should you have any questions about our application, please contact me at (617) 413-0068 or Andrew@missionpartners.co.

Sincerely,

Andrew Thut
REVISIONS AND CLARIFYING INFORMATION SUMMARY

Item 1

We have attached an independent legal opinion that the Promissory Note we submitted is in compliance with the non-profit requirements of 105 CMR 725.100(A)(1) and the Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance and also with Massachusetts usury laws.

Item 2

We have attached here a revised independent legal opinion for the agreement with 4Front Advisors, LLC that, while materially consistent with the original submission, features a more accurate date for the contract and identifies Mission Massachusetts, Inc. by name within the narrative of the letter. Please reference this letter in your ongoing review of our application.

Item 3

We have attached amended agreements with 4Front Advisors, LLC (as referenced in the independent legal opinion letter provided for Item 2 above) and 4Front Management Associates, LLC. The amended agreements feature specific mechanisms to safeguard compliance with the Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance, in the event that ongoing payments to a related party exceed fair market value and are no longer commercially reasonable. These provisions can be found in the amendments to the agreement, as attached.

Item 4

We have attached revised responses to Question D.20, per your request.

Item 5

On February 2, 2016, we submitted to DPH a revised Section D capital contributions table for our Applications of Intent (1 of 3, 2 of 3, and 3 of 3), which reflects MMA Capital, LLC as the entity contributing capital to Mission Massachusetts, Inc., and also a financial account summary for MMA Capital, LLC as of January 31, 2016.
20. Describe the experience, and length of experience, of the Corporation’s individual/entity responsible for marijuana for medical use cultivation operations and individual/entity responsible for the RMD security plan and security operations with providing services for marijuana for medical purposes.

Security:
Senior Executives at The Winmill Group (TWG), who will be directly providing support, have over 40 years of combined security experience; 30 years of combined military experience; 25 years of combined law enforcement experience; 14 years of homeland security experience, and three years of medical marijuana experience in four other states across the country. TWG is a leading expert on establishing nationally recognized best practices for security, including those for anti-diversion, risk management, employee safety training, local community outreach, and collaborative partnerships with law enforcement. TWG’s engagements include supporting multiple dispensaries and cultivation facilities located in Massachusetts including Plymouth and Quincy. TWG is also supporting ten other Medical Marijuana projects in Nevada, Illinois, and Colorado.

Headquartered in the Washington D.C. area, TWG’s team includes talented professionals drawn from high-level posts including former executives from the FBI, U.S. DEA, U.S. Department of Homeland Security, U.S. Navy, Massachusetts State Police, and the Boston Fire Department, among others. Prior to working in the MMJ industry, TWG has been providing homeland security and emergency planning consulting services and advice on tactical and strategic planning for state, local and the federal government for the past eight years. Notable projects included three Presidential Inaugurations, the G8 Summit, Republican National Convention, Democratic National Convention, and law enforcement intelligence training for New York, Boston, and Washington D.C., among others.

TWG are represented on the applications for Ermont and Medical Marijuana of Massachusetts from 2014, and are currently represented in the 2015 applications for Mission Massachusetts, Ermont, Green Harbor Dispensary, and Commonwealth Alternative Care.

Cultivation:
Hired as the assistant grower for a wholesale medical marijuana company in Colorado called Zengold’s Cannabis Wholesale, Cory Ravelson learned all aspects of the cultivation of marijuana. Within 10 months Cory was promoted to Manager of Distribution for Zengold’s.

After nearly a year of working in the cultivation center, Cory transitioned over to the associated medical cannabis dispensary called Headquarter MMC where he stayed for 3 years and was again promoted to General Manager. In this capacity, he continued to communicate directly with Master Grower to determine product grow cycles and played a major role in acquiring new strains.

Cory’s 4 years of experience in the medical cannabis industry have given him a high level of knowledge for both the cultivation and retail sides of the industry.