May 19, 2017

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

Re: Mission Massachusetts Siting Profile Submission 3 of 3

Mr. Sheehan:

In response to your Request for Additional Information from May 19, 2017, please find attached several documents for your review.

1. We have included here a revised response to Question 12 within our Management and Operations Profile (Application 2 of 3), which provides the details of all related party transactions, including the transaction with MMA Capital, LLC: a sublease for property at 640 Lincoln Street, Worcester, MA.

2. We have included here an independent legal opinion from Attorney Tracey Bolotnick, as well as an appraisal completed by licensed real estate appraiser Howard Dono, confirming that the agreement between Mission Massachusetts, Inc. and MMA Capital, LLC 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. The Master Lease and the Sublease, with related amendments, were attached in our submission on May 17, 2017.

3. We have included below information from the Town of Adams demonstrating that the DPH-noted locations do not conduct regularly scheduled programs for persons under 18 years of age:
   a. Community Health Programs, 19 Depot Street: This is a doctor’s office wherein children do not commonly congregate for particular purposes in a structured and scheduled manner.
   b. Karen’s School of Driving, 7 Park Street: This facility is mainly used to coordinate off-site instructional activities for registrants; minors do not regularly congregate within this facility. The lessons are remote driving lessons with this facility as a drop off/starting point. Classes for mixed ages run several times per year.
   c. Adams Town Office, 20 Pleasant Street: This is a town-owned parcel that contains a few benches and tables; no programming occurs here. Children do not commonly congregate for particular purposes in a structured and scheduled
manner.

d. Medical Offices, 2 Park Street: This is a dentist's office. Children do not commonly congregate for particular purposes in a structured and scheduled manner.

e. Adams Town Hall, 6 Park Street: Town Hall in Adams houses offices for the Town Administrator/Selectmen, Town Clerk, Tax Collector, Public Works, Inspections, Community Development, Assessing, and Veteran's Services. There is no youth programming or activities at this property.

f. Chris Manley’s MMA and Self Defense, 39 Back Row Street: This facility offers occasional mixed martial arts lessons and self-defense classes for persons of all ages.

Should you have any further questions or require additional information to process this request in a timely manner, please contact me at (617) 413-0068 or Andrew@missionpartners.co.

Sincerely,

Andrew Thut
CEO
12. Please identify any agreements or contracts, executed or proposed, in which the applicant will engage in a Related Party Transaction and summarize the terms of each such agreement.

RMD intends to enter agreements with related parties for the procurement of:

1) Best practices intellectual property and management training services with 4Front Advisors, LLC (includes upfront payment of $25,000 and a 5% licensing agreement tied to revenue);

2) Management services agreement with 4Front Management Associates, LLC (cost plus contract with a 20% markup on direct costs);

3) Loan to support the capital needs from MMA Capital, LLC (18% interest rate); and

4) A 3-year sublease (with 2 extension periods) with MMA Capital, LLC for 24,424 sf of property at 640 Lincoln Street, Worcester, MA for a co-located cultivation, processing, and dispensary RMD facility. Rent is $9,303.50 per month during LY 1 and advances to $9,869.80 per month by LY 3.

4Front Ventures, Inc. is the sole member of 4Front Advisors, LLC and 4Front Capital, LLC. Three RMD directors own partial interests in 4Front Ventures. 4Front Management Associates, LLC and MMA Capital, LLC are partially owned by 4Front Capital, LLC.

We have adopted a Conflict of Interest Policy under which related party transactions must be approved by disinterested directors on the basis of being commercially reasonable and fair to the nonprofit entity.