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**DELIVERED ELECTRONICALLY**

May 4, 2023

Ms. Shireen Hart  
Primmer, Piper, Eggleston & Cramer, PC  
30 Main Street  
Suite 500, P.O. Box 1489  
Burlington, VT 05402

**RE: Docket No. GMCB-006-23con, Proposed Purchase of 100% Ownership Interest in Silver Pines Partners, LLC**

Dear Ms. Hart:

Thank you for your letter of April 4, 2023, requesting a jurisdictional determination regarding Integrative Life Network, LLC's intent to purchase 100% of the ownership interest in Silver Pines Partners, LLC (Silver Pines) and your letter of April 17, 2023, responding to the Board's request for additional information.

The Board has a second set of requests for additional information to make the requested determination. Please provide the following information:

1. A version of the Membership Interest Purchase Agreement (MIPA) in which only Tax Identification Numbers, Employer Identification Numbers, Social Security Numbers, and Protected Health Information are redacted.
2. Integrative Life Network, LLC's Profit and Loss Statement for the most recently completed fiscal year.
3. The investment memo regarding Integrative Life Network, LLC's decision to purchase ownership interest in Silver Pines.
4. A list of all legal or regulatory complaints, actions, or investigations involving Integrative Life Network, LLC.



5. For the period of 2018 to present, a list of all legal or regulatory complaints, actions, or investigations involving health care facilities, including but not limited to, substance use disorder treatment facilities, in which Martin Ventures is an investor.

The 30-day review period for the jurisdictional determination is tolled until your response to this request for additional information is received.

Please send an electronic copy attached to an e-mail to me at [donna.jerry@vermont.gov](mailto:donna.jerry@vermont.gov) and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05633.

If you have any questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

*s/ Donna Jerry*  
Senior Health Policy Analyst  
Green Mountain Care Board

cc. Laura Beliveau, Staff Attorney, GMCB

