



## Massachusetts Cannabis Control Commission

### Marijuana Retailer

#### General Information:

License Number: MR284328  
Original Issued Date: 08/03/2022  
Issued Date: 08/03/2022  
Expiration Date: 08/03/2023

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Silver Therapeutics of Palmer, Inc.

Phone Number: 518-570-9067 Email Address: josh@agtherapeutics.com

Business Address 1: 1235 Thorndike Street Business Address 2:  
Business City: Palmer Business State: MA Business Zip Code: 01069  
Mailing Address 1: 89 Court Street Mailing Address 2:  
Mailing City: Saratoga Mailing State: NY Mailing Zip Code: 12866

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: no  
Priority Applicant Type: Not a Priority Applicant  
Economic Empowerment Applicant Certification Number:  
RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:  
Department of Public Health RMD Registration Number:  
Operational and Registration Status:  
To your knowledge, is the existing RMD certificate of registration in good standing?:  
If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

#### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 28.8 Percentage Of Control: 33.3  
Role: Owner / Partner Other Role:  
First Name: Joshua Last Name: Silver Suffix:

Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership: 28.8	Percentage Of Control: 33.3
Role: Owner / Partner	Other Role:
First Name: Brendan	Last Name: McKee Suffix:
Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

#### Person with Direct or Indirect Authority 3

Percentage Of Ownership: 28.8	Percentage Of Control: 33.3
Role: Owner / Partner	Other Role:
First Name: Joshua	Last Name: Ferranto Suffix:
Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

#### Entity with Direct or Indirect Authority 1

Percentage of Control: 100	Percentage of Ownership: 100
Entity Legal Name: Silver Therapeutics, Inc.	Entity DBA: DBA City:
Entity Description: To own and apply for licenses with the Cannabis Control Commission, and engage in an other lawful activity in the Commonwealth of Massachusetts.	
Foreign Subsidiary Narrative:	
Entity Phone: 518-570-9067	Entity Email: josh@agtherapeutics.com
Entity Address 1: 89 Court Street	Entity Address 2:
Entity City: Saratoga Springs	Entity State: NY
Entity Mailing Address 1: 89 Court Street	Entity Zip Code: 12866
Entity Mailing City: Saratoga Springs	Entity Mailing Address 2:
Entity Mailing State: NY	Entity Mailing Zip Code: 12866
Relationship Description: Silver Therapeutics, Inc wholly owns Silver Therapeutics of Palmer, Inc.	

### CLOSE ASSOCIATES AND MEMBERS

No records found

### CAPITAL RESOURCES - INDIVIDUALS

No records found

### CAPITAL RESOURCES - ENTITIES

#### Entity Contributing Capital 1

Entity Legal Name: Silver Therapeutics, Inc.	Entity DBA:
Email: josh@agtherapeutics.com	Phone: 518-570-9067

Address 1: 89 Court Street		Address 2:	
City: Saratoga Springs	State: NY	Zip Code: 12866	
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of Capital Provided: \$250000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

##### Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment			
Owner First Name:	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Silver Therapeutics of Portland, LLC		Entity DBA:	
Entity Description: Silver Therapeutics of Portland LLC holds a conditional license for a retail establishment in Mane.			
Entity Phone:	Entity Email:	Entity Website:	
518-570-9067	josh@agtherapeutics.com		
Entity Address 1: 84 Marginal Way		Entity Address 2: Suite 600	
Entity City: Portland	Entity State: ME	Entity Zip Code: 04101	Entity Country: USA
Entity Mailing Address 1: 84 Marginal Way		Entity Mailing Address 2: Suite 600	
Entity Mailing City:	Entity Mailing State: ME	Entity Mailing Zip Code:	Entity Mailing Country:
Portland		04101	USA

##### Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment			
Owner First Name:	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Silver Therapeutics Cultivation, LLC		Entity DBA:	
Entity Description: Silver Therapeutics Cultivation LLC holds a conditional license for a cultivation facility in Maine.			
Entity Phone:	Entity Email:	Entity Website:	
518-570-9067	josh@agtherapeutics.com		
Entity Address 1: 84 Marginal Way		Entity Address 2: Suite 600	
Entity City: Portland	Entity State: ME	Entity Zip Code: 04101	Entity Country: USA
Entity Mailing Address 1: 84 Marginal Way		Entity Mailing Address 2: Suite 600	
Entity Mailing City:	Entity Mailing State: ME	Entity Mailing Zip Code:	Entity Mailing Country:
Portland		04101	USA

##### Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment			
Owner First Name:	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Silver Therapeutics of Berwick, LLC		Entity DBA:	
Entity Description: Silver Therapeutics of Berwick LLC holds a conditional license for a retail establishment in Maine			
Entity Phone:	Entity Email:	Entity Website:	
518-570-9067	josh@agtherapeutics.com		
Entity Address 1: 84 Marginal Way		Entity Address 2: Suite 600	
Entity City: Portland	Entity State: ME	Entity Zip Code: 04101	Entity Country: USA
Entity Mailing Address 1: 84 Marginal Way		Entity Mailing Address 2: Suite 600	
Entity Mailing City:	Entity Mailing State: ME	Entity Mailing Zip Code:	Entity Mailing Country:
Portland		04101	USA

##### Business Interest in Other State 4

**Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment**

Owner First Name:	Owner Last Name:	Owner Suffix:
Entity Legal Name: Silver Therapeutics of South Portland, LLC	Entity DBA:	
Entity Description: Silver Therapeutics of South Portland LLC holds a conditional license for a retail facility in Maine.		
Entity Phone: 518-570-9067	Entity Email: josh@agtherapeutics.com	Entity Website:
Entity Address 1: 84 Marginal Way	Entity Address 2: Suite 600	
Entity City: Portland	Entity State: ME	Entity Zip Code: 04101      Entity Country: USA
Entity Mailing Address 1: 84 Marginal Way	Entity Mailing Address 2: Suite 600	
Entity Mailing City: Portland	Entity Mailing State: ME	Entity Mailing Zip Code: 04101      Entity Mailing Country: USA

**DISCLOSURE OF INDIVIDUAL INTERESTS****Individual 1**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

**Individual 2**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

**Individual 3**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

**Individual 4**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Other	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

**Individual 5**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Williamstown	Marijuana Establishment State: MA	

**Individual 6**

First Name: Joshua	Last Name: Silver	Suffix:
Marijuana Establishment Name: Main Street Medicinals, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Tisbury	Marijuana Establishment State: MA	

**Individual 7**

First Name: Joshua	Last Name: Silver	Suffix:
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<b>Marijuana Establishment Name:</b> Main Street Medicinals, LLC	<b>Business Type:</b> Marijuana Cultivator
<b>Marijuana Establishment City:</b> Tisbury	<b>Marijuana Establishment State:</b> MA

Individual 8

<b>First Name:</b> Joshua	<b>Last Name:</b> Silver	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Main Street Medicinals, LLC	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Tisbury	<b>Marijuana Establishment State:</b> MA	

Individual 9

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Silver Therapeutics, Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Boston	<b>Marijuana Establishment State:</b> MA	

Individual 10

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Silver Therapeutics, Inc.	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Boston	<b>Marijuana Establishment State:</b> MA	

Individual 11

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Silver Therapeutics, Inc.	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Boston	<b>Marijuana Establishment State:</b> MA	

Individual 12

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Silver Therapeutics, Inc.	<b>Business Type:</b> Other	
<b>Marijuana Establishment City:</b> Boston	<b>Marijuana Establishment State:</b> MA	

Individual 13

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Silver Therapeutics, Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Williamstown	<b>Marijuana Establishment State:</b> MA	

Individual 14

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Main Street Medicinals, LLC	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Tisbury	<b>Marijuana Establishment State:</b> MA	

Individual 15

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Main Street Medicinals, LLC	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Tisbury	<b>Marijuana Establishment State:</b> MA	

Individual 16

<b>First Name:</b> Brendan	<b>Last Name:</b> McKee	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Main Street Medicinals, LLC	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Tisbury	<b>Marijuana Establishment State:</b> MA	

Individual 17

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

#### Individual 18

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

#### Individual 19

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

#### Individual 20

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Other	
Marijuana Establishment City: Boston	Marijuana Establishment State: MA	

#### Individual 21

First Name: Joshua	Last Name: Farranto	Suffix:
Marijuana Establishment Name: Silver Therapeutics, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Williamstown	Marijuana Establishment State: MA	

#### Individual 22

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Main Street Medicinals, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Tisbury	Marijuana Establishment State: MA	

#### Individual 23

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Main Street Medicinals, LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Tisbury	Marijuana Establishment State: MA	

#### Individual 24

First Name: Joshua	Last Name: Ferranto	Suffix:
Marijuana Establishment Name: Main Street Medicinals, LLC	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Tisbury	Marijuana Establishment State: MA	

### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1235 Thorndike Street	
Establishment Address 2:	
Establishment City: Palmer	Establishment Zip Code: 01069
Approximate square footage of the establishment: 1300	How many abutters does this property have?: 9
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes	

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Silver of Palmer HCA Form.pdf	pdf	6262ac594d83ec000a3286a4	04/22/2022
Plan to Remain Compliant with Local Zoning	Plan to remain Compliant with Local Zoning.pdf	pdf	6262acd0560e3c00087c5a2c	04/22/2022
Community Outreach Meeting Documentation	4.20.22 Silver Therapeutics Virtual Outreach Meeting Attestation SIGNED.pdf	pdf	6262e233560e3c00087ceb55	04/22/2022

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Plan.pdf	pdf	6262ad44560e3c00087c5abf	04/22/2022

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

##### Individual Background Information 1

Role: Owner / Partner      Other Role:

First Name: Joshua      Last Name: Silver      Suffix:

RMD Association: RMD Owner

Background Question: yes

##### Individual Background Information 2

Role: Owner / Partner      Other Role:

First Name: Brendan      Last Name: McKee      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 3

Role: Owner / Partner      Other Role:

First Name: Joshua      Last Name: Ferranto      Suffix:

RMD Association: RMD Owner

Background Question: yes

#### ENTITY BACKGROUND CHECK INFORMATION

##### Entity Background Check Information 1

Role: Parent Company      Other Role:

Entity Legal Name: Silver Therapeutics, Inc.      Entity DBA:

Entity Description: A Massachusetts corporation established to own stock or membership interests in other companies and to engage in such business activities as are allowed under Massachusetts law.

Phone: 518-570-9067      Email: josh@agtherapeutics.com

Primary Business Address 1: 89 Court Street

Primary Business Address 2:

Primary Business City: Saratoga Springs

Primary Business State: NY

Principal Business

Zip Code: 12866

Additional Information:

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Articles of Organization - filed Silver Therapeutics of Palmer Inc.pdf	pdf	6262b0a1560e3c00087c665a	04/22/2022
Bylaws	Bylaws Silver Therapeutics of Palmer Inc.pdf	pdf	6262b0cb4d83ec000a329572	04/22/2022
Secretary of Commonwealth - Certificate of Good Standing	Silver Therapeutics of Palmer, Inc. - Certificate of Good Standing - 2022-04-14.PDF	pdf	6262b0e8560e3c00087c6795	04/22/2022
Department of Revenue - Certificate of Good standing	Certificate of Good Standing Palmer 4 21 22 DOR.pdf	pdf	6262e2d14d83ec000a3320a5	04/22/2022
Department of Revenue - Certificate of Good standing	J. Silver Cert no-employees 4-12-22 SIGNED.pdf	pdf	6262e2f24d83ec000a33219c	04/22/2022

No documents uploaded

Massachusetts Business Identification Number: 001493853

Doing-Business-As Name:

DBA Registration City:

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Proposed Timeline .pdf	pdf	6262b24a4d83ec000a329e31	04/22/2022
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	6262b2c24d83ec000a329eef	04/22/2022
Business Plan	Silver Therapeutics Business Plan Palmer 4-22-22.pdf	pdf	6262e3d14d83ec000a3323e9	04/22/2022

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for Obtaining Marijuana Products.pdf	pdf	6262c0494d83ec000a32c116	04/22/2022
Restricting Access to age 21 and older	Restricting Access to age 21 and Older.pdf	pdf	6262c0594d83ec000a32c12a	04/22/2022
Prevention of diversion	Prevenson of Diversion.pdf	pdf	6262c064560e3c00087c95d4	04/22/2022
Storage of marijuana	Storage.pdf	pdf	6262c07a4d83ec000a32c1a5	04/22/2022

Transportation of marijuana	Transportation of marijuana.pdf	pdf	6262c097560e3c00087c9618	04/22/2022
Inventory procedures	Inventory Policies.pdf	pdf	6262c09f4d83ec000a32c1ce	04/22/2022
Quality control and testing	Quality Control and Testing.pdf	pdf	6262c0a84d83ec000a32c1e2	04/22/2022
Dispensing procedures	Retail and Dispensing Policies.pdf	pdf	6262c0b24d83ec000a32c229	04/22/2022
Personnel policies including background checks	Personnel Policies and background checks.pdf	pdf	6262c0bd560e3c00087c963d	04/22/2022
Record Keeping procedures	Record Keeping.pdf	pdf	6262c0c54d83ec000a32c256	04/22/2022
Maintaining of financial records	Maintaining Financial Records.pdf	pdf	6262c0cc4d83ec000a32c27f	04/22/2022
Qualifications and training	Employee Qualification and Training.pdf	pdf	6262c0de560e3c00087c9685	04/22/2022
Energy Compliance Plan	Energy Compliance.pdf	pdf	6262c0e44d83ec000a32c2d9	04/22/2022
Security plan	Security Policies.pdf	pdf	6262e4fb560e3c00087cf2a7	04/22/2022
Diversity plan	Silver Therapeutics Palmer Diversity Plan Updated 5-12-22.pdf	pdf	627d297ceb816b0008583067	05/12/2022

#### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

#### ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

Notification:

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.:

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.:

I certify that all information contained within this renewal application is complete and true.:

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 8:00 PM



## Host Community Agreement Certification Form

### Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

### Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

1. Name of applicant:

Silver Therapeutics of Palmer, Inc.

2. Name of applicant's authorized representative:

Joshua Silver

3. Signature of applicant's authorized representative:

DocuSigned by:  
  
C8442C0A9181459...

4. Name of municipality:

Town of Palmer

5. Name of municipality's contracting authority or authorized representative:

Ryan McArthur, Town Manager



6. Signature of municipality's contracting authority or authorized representative:

A handwritten signature in black ink, consisting of a large loop followed by a horizontal stroke and a sharp upward flick.

7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

rmcruitt@townofpalmer

8. Host community agreement execution date:

March 21, 2021



## **Silver Therapeutics of Palmer, Inc.**

### **Plan to Remain Compliant with Local Zoning**

The Town of Palmer amended its zoning code in September 2018 to allow the dispensing of marijuana for adult-use in the Highway Business District (HBD).

Silver Therapeutics of Palmer, Inc. (the “**Company**”), is proposing to develop and operate a Marijuana Establishment at 1235 Thorndike Street, Palmer MA 01069. This site is located in the HBD zone, which permits the operation of a Marijuana Establishment, specifically a Marijuana Retailer, by Special Permit from the Planning Board pursuant to Article XXIV Section 171-124 D of the Town of Palmer zoning bylaws.

The Company has discussed the Marijuana Establishment with Town officials, including the building department, police department and fire department, appeared before the Town Council and entered into a host community agreement with the Town. The Company received a Special Permit from the Town of Palmer Planning Board (the “Board”) on September 21, 2020 (the “SP Decision”).

The Company hereby submits that it will continue to comply with all local and state requirements and its President, Josh Silver will be responsible for ongoing compliance with local and state rules and regulations.

# Community Outreach Meeting Attestation Form

## Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

## Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s):
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

a. Date of publication:

b. Name of publication:

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

a. Date notice filed:

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- The type(s) of ME or MTC to be located at the proposed address;
  - Information adequate to demonstrate that the location will be maintained securely;
  - Steps to be taken by the ME or MTC to prevent diversion to minors;
  - A plan by the ME or MTC to positively impact the community; and
  - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



Attachment A

Newspaper Publication

Note: archived edition of the newspaper is not yet available.  
Attached is the proof copy and confirmation of payment.

LEGAL NOTICE OF  
A COMMUNITY  
OUTREACH MEETING  
REGARDING  
A MARIJUANA  
ESTABLISHMENT  
PROPOSED BY  
Silver Therapeutics of  
Palmer, Inc.

Notice is hereby given that a virtual community outreach meeting for **Silver Therapeutics of Palmer, Inc.’s proposed Marijuana Establishment** is scheduled for **April 20, 2022, at 5:00 p.m.**, online at <https://princelobel.zoom.us/j/88415198726> or by telephone by calling +1 301 715 8592, Webinar ID: 884 1519 8726. The proposed Marijuana Retailer is anticipated to be located at **1235 Thorndike Street, Palmer, Massachusetts 01069** (the “Property”). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of Silver Therapeutics of Palmer, Inc. Questions may be submitted in advance to [hello@agtherapeutics.com](mailto:hello@agtherapeutics.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting at [princelobel.com](http://princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission’s Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq. A copy of this notice is on file with the town clerk, the planning board, and the contracting authority for the municipality, at Town Hall, 4417 Main Street, Palmer, Massachusetts 01069. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.  
04/07/2022

**CALENDAR** | from page 9

den is open year-round (handouts in box on one of the sign posts). For more information call 413-267-4137, email khm@keephomesteadmuseum.org or visit [www.keephomesteadmuseum.org](http://www.keephomesteadmuseum.org).

THE QUABOAG VALLEY QUILTERS GUILD is looking for new members. The Guild meets on the first and third Thursdays of the month at 1 p.m. in the Amvets post at 2150 Main St., Three Rivers. The Guild is a no-pressure group with varying degrees of accom-

plishments, from novice to Big E "Best In Show" winners. Dues are \$55 a year. For more information, contact Barbara Beaulieu at 267-4044 or Merry Mombourquette at 283-7577. Follow them on Facebook.

STAINED GLASS MAKING CLASS will be held on Thursdays at the Holland Community Center from 10 a.m.-1 p.m. or 6-9 p.m. Glass and tools are supplied. Take six classes for \$48. Class sizes are limited and are open to all ages. For more information call Tom Baltazar at 508-245-2525.

DIAMOND NATIONAL/CASCADES DIAMOND. Have you ever worked there? Former employees meet on the third Tuesday of every month at Burgundy Brook Restaurant on Route 181 in Palmer from 9-10 a.m. The stories shared are often colorful but old friendships are renewed.

**ONGOING**

QI GONG: Presented by Monson Parks & Rec and the Monson Free Library every Tuesday night 6 p.m. at Memorial Hall with Randy Emerson. Free, no registration.

MUSIC LESSONS, YOGA AND MORE: Just because days are short, and the thermometer reads cold doesn't mean there's nothing to do. Hitchcock Academy constantly works with instructors to offer options to its community members. Look for upcoming classes in yoga, tai chi, meditation, and fencing. Hitchcock Academy follows all current COVID guidelines for cleaning and social distancing and anyone using the facility must wear a mask.

All information regarding current class offerings, events, and registration are available at [hitchcockacademy.org](http://hitchcockacademy.org).

# Viewpoints

**Commonwealth of Massachusetts**  
**The Trial Court**  
**Hampden Probate and Family Court**  
**50 State Street**  
**Springfield, MA 01103**  
**(413)748-7758**  
**Docket No. HD21P1908EA**  
**Estate of:**  
**Lorrie A. Baird**  
**Date of Death: 07/07/2021**  
**CITATION ON PETITION FOR FORMAL ADJUDICATION**  
To all interested persons:  
A Petition for Sale of Real Estate has been filed by: Amber Baird of Monson, MA

**IMPORTANT NOTICE**  
You have the right to obtain a copy of the Petition from the Petitioner or at the court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this court before: 10:00 a.m. on the return day of 04/26/2022.

This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

WITNESS, Hon. Barbara M Hyland, First Justice of this Court.  
Date: March 29, 2022  
**Rosemary A Saccamani**  
Register of Probate  
04/07/2022

**LEGAL NOTICE OF A COMMUNITY OUTREACH MEETING REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY Silver Therapeutics of Palmer, Inc.**  
Notice is hereby given that a virtual community outreach meeting for Silver Therapeutics of Palmer, Inc.'s proposed Marijuana Establishment is scheduled for April 20, 2022, at 5:00 p.m., online at <https://princelobel.zoom.us/j/88415198726> or by telephone by calling +1 301 715 8592. Webinar ID: 884 1519 8726. The proposed Marijuana Retailer is anticipated to be located at 1235 Thorndike Street, Palmer, Massachusetts 01069 (the "Property"). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of Silver Therapeutics of Palmer, Inc.

Questions may be submitted in advance to [hello@agtherapeutics.com](mailto:hello@agtherapeutics.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting at [princelobel.com](http://princelobel.com). This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the town clerk, the planning board, and the contracting authority for the municipality, at Town Hall, 4417 Main Street, Palmer, Massachusetts 01069. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.  
04/07/2022

Witness, **Gordon H. Piper**, Chief Justice of this Court on March 24, 2022.  
Attest:  
**Deborah J. Patterson**  
Recorder  
11389  
04/07/2022

**Legal Notice**  
**\*\*This Public Hearing will be held in-person and remote via Zoom\*\***  
The Monson School Committee will hold a Public Hearing to discuss the proposed 2022-2023 School Department budget, as required by law, on **April 14, 2022 at 6:30 p.m.** at Quarry Hill Community School-School Committee Room # 428, 43 Margaret Street, Monson, MA 01057

**Join Zoom Meeting**  
<https://us06web.zoom.us/j/81964249097>  
**Meeting ID:** 819 6424 9097

**One tap mobile**  
+13126266799, 8196424 9097# US (Chicago)  
+19292056099, 8196424 9097# US (New York)  
**Dial by your location**  
+1 312 626 6799 US (Chicago)  
+1 929 205 6099 US (New York)  
+1 301 715 8592 US (Washington DC)  
+1 346 248 7799 US (Houston)  
+1 669 900 6833 US (San Jose)  
+1 253 215 8782 US (Tacoma)  
**Meeting ID:** 819 6424 9097

**Find your local number:**  
<https://us06web.zoom.us/j/81964249097>  
03/31, 04/07/2022

# Job Connection

## HELPING YOU FIND HELP

**Teacher Assistant Preschool (Ware)**

Head Start program seeks preschool assistant. Excellent teacher: child ratios. EEC Preschool Certification preferred. 27.5 hours/week/school year. Salary Range \$15.22-\$16.15 /hour.

Community Action offers a comprehensive benefits package. We offer Health Insurance, Dental Insurance, Retirement Plan, Flexible Spending Plans (medical and dependent care), Vision Insurance, Short-Term and Long-Term Disability Insurance, Sick, Vacation, Personal time and 12 paid Holidays.

Please go <https://www.communityaction.us/job-openings> to apply, for full job descriptions, and information regarding benefits.

Community Action is committed to a diverse workforce. AA/EOE/ADA

**The town of Palmer is seeking a qualified individual to fill the position of Principal Clerk for the Town Clerk's Office.**

The purpose of this role is to perform a variety of administrative and clerical work in assisting the Town Clerk in discharging the duties of the office; and all other related work as required.

The Principal Clerk is responsible for maintaining and improving upon the efficiency and effectiveness of all areas under his/her direction and control.

Complete job description via web site  
Employment Opportunities | Palmer, MA ([townofpalmer.com](http://townofpalmer.com))  
Starting pay range \$19.88-\$20.98 depending on qualifications.

Applicants can submit cover letter, resume & town of Palmer employment application to: Town of Palmer, Town Manager, 4417 Main Street, Palmer, MA 01069, or email [scoache@townofpalmer.com](mailto:scoache@townofpalmer.com). Position will remain open until filled. AA/EEO

## Kitchen Staff - Food Preparation WE'RE HIRING!

Eagle Hill School is seeking full and **part time kitchen staff** to assist in food preparation and serving.

Ability to work in a team environment, independently with minimal supervision. Must be flexible regarding scheduling, including nights, weekends, and/or holidays as needed. Successful completion of background checks is required.

Physical requirements: Able to lift, push, & pull up to 30 lbs.;  
Able to repetitively bend, stretch, twist, etc.;  
Able to stand for long periods of time;  
Able to work in a high humidity environment.

If interested, call Kathy Stone-Johnson, 413-477-6122, between 7:00 AM and 2:00 PM.

## Free Sheet Metal Fabrication & Welding Training Program beginning May 2022

**Competitive Starting Wages and Benefits (\$18-\$21 per hour)**

**Train for a Career Opportunities with a Future!**

The Sheet Metal Local 63 Union, located in Springfield, will be providing pre-apprenticeship technical training in basic metal fabrication to unemployed adults.



Trainees will learn blueprint reading, shop math, basic welding and how to setup and utilize basic fabrication tools and shop equipment.

- ◆ Employer demand for program graduates is high
- ◆ Career pathways to Apprentice opportunities may be available
- ◆ 16 Week, 165 Hours of late afternoon/early evening training
- ◆ Four days per week on-campus training at Local 63 Training Facility

Visit <https://masshirehwcw.com> for more details and online application.

**Trainee Requirements**

- Unemployed
- High School Diploma or GED
- Legally able to work in the United States
- State or Federal ID
- Have transportation to training (no bus service) in evening
- Complete basic assessment test
- Complete all required documentation with career center

**Interested? Questions?**  
**Contact Larry Martin at:**  
**413-755-1361 or**  
**[lmartin@masshirehwcw.com](mailto:lmartin@masshirehwcw.com)**



**This Training is funded by the Massachusetts Technology Collaborative.**

## NOW HIRING SIDE COOK & PIZZA OVEN COOK IN BUSY RESTAURANT MUST APPLY IN PERSON

Please come in if you're willing to work. Experience a plus, but not necessary.



[www.LaTrattoriaBelchertown.net](http://www.LaTrattoriaBelchertown.net)

37 State Street  
Belchertown, MA

everyone shines  
**SUNSHINE VILLAGE**

## Come Join Our Team

### Job Title: Direct Support Professional

**Location:**  
Three Rivers, MA

**Hours:**  
35 hours/week - Monday through Friday 8:30am-3:30pm

**Educational Requirements:**  
High School Diploma/ GED/or Equivalent

**Other Requirements:**  
Ability to lift 30 lbs. comfortably, a valid driver's license and a reliable vehicle.

**Job Summary:**  
Development and implementation of active treatment and habilitation programs for individuals with developmental disabilities. The ideal candidate will be a positive role model with good communication skills who can work alone and as a team.

**Salary:**  
\$15.50/hour to start, \$15.90 upon completion of introductory period (90 days)

**Benefits:**  
Health, Dental, Vision, 401K w/match, LTD, EAP, PTO

Accepting applications at  
75 Litwin Lane, Chicopee, MA 01020.  
AA/EOE. Sunshine Village is a great place to work!

## Viewpoints

Commonwealth of  
Massachusetts  
The Trial Court  
Hampden Probate and  
Family Court  
50 State Street  
Springfield, MA 01103  
(413)748-7758

Docket No. HD22P0706EA  
Estate of:  
David Reynold Rose  
Also known as:  
David R Rose  
Date of Death: 01/28/2022

CITATION ON  
PETITION FOR  
FORMAL  
ADJUDICATION  
To all interested persons:  
A Petition for Formal  
Adjudication of Intestacy  
and Appointment of  
Personal Representative  
has been filed by Teresa  
Rose of Monson, MA  
requesting that the Court  
enter a formal Decree and  
Order and for such other  
relief as requested in the  
Petition.

The Petitioner requests  
that: **Teresa Rose of  
Monson, MA** be appointed  
as Personal Representative  
of said estate to serve  
**Without Surety** on the bond  
in **unsupervised adminis-**  
**tration.**

**IMPORTANT NOTICE**  
You have the right  
to obtain a copy of the  
Petition from the Petitioner  
or at the Court. You have a  
right to object to this pro-  
ceeding. To do so, you or  
your attorney must file a  
written appearance and  
objection at this Court  
before: 10:00 a.m. on the  
return day of 04/28/2022.

This is NOT a hear-  
ing date, but a deadline  
by which you must file a  
written appearance and  
objection if you object to  
this proceeding. If you  
fail to file a timely written  
appearance and objection  
followed by an affidavit of  
objections within thirty  
(30) days of the return day,  
action may be taken with-  
out further notice to you.

**UNSUPERVISED  
ADMINISTRATION  
UNDER THE  
MASSACHUSETTS  
UNIFORM PROBATE  
CODE (MUPC)**

A Personal Represent-  
ative appointed under the  
MUPC in an unsuper-  
vised administration is not  
required to file an inven-  
tory or annual accounts  
with the Court. Persons  
interested in the estate are  
entitled to notice regard-  
ing the administration  
directly from the Personal  
Representative and may  
petition the Court in any  
matter relating to the  
estate, including the dis-  
tribution of assets and  
expenses of administration.

**WITNESS, Hon.**  
**Barbara M Hyland, First**  
Justice of this Court.  
Date: March 31, 2022  
**Rosemary A Saccomani**  
Register of Probate  
04/07/2022

**COMMONWEALTH OF  
MASSACHUSETTS  
THE TRIAL COURT  
HAMPDEN, Div.**  
Probate & Family Court  
Dept.

**HD22E0014PP**  
To Paul S Skvirsky of  
Dover, New Hampshire, and  
to all other persons interest-  
ed.

A petition has been pre-  
sented to said Court by Gail  
Skvirsky-Bohn of West  
Suffield, Connecticut rep-  
resenting that they hold as ten-  
ants in common an undivid-  
ed part or share of land lying  
in Wales, in the County of  
Hampden, setting forth that  
she desires that all of said  
land may be sold at private  
sale or public auction for  
not less than Two Hundred  
Ten Thousand (\$210,000.00)  
Dollars, and praying that  
partition may be made of all  
the land aforesaid according  
to law, and to that end that  
a commissioner be appointed  
to make such partition  
and be ordered to make sale  
and conveyance of all, or  
any part of said land which  
the Court finds cannot be  
advantageously divided  
either at private sale or pub-  
lic auction, and be ordered  
to distribute the net proceeds  
thereof after full adjudica-  
tion of the equitable claims  
contained in said petition  
and supplemental memoran-  
dum filed with the Court.

If you desire to object  
thereto you or your attor-  
ney should file a written  
appearance in said Court  
at Springfield before ten

o'clock in the forenoon on  
the day of **twenty-fourth**  
**day of May, 2022**, the  
return day of this citation.

Witness, BARBARA M.  
HYLAND, Esquire, First  
Justice of said Court, this  
15th day of March, 2022.

**Rosemary Saccomani**  
Register of Probate &  
Family Court  
04/07, 04/14, 04/21/2022

## LEGAL NOTICE

Pursuant to the provisions of  
MA Gen. Laws, Chap. 255,  
Sec. 39A, the following vehi-  
cles will be sold at public  
auction for towing and stor-  
age charges due: HYUNDAI  
VIN:KM8SC73D14U770743  
Brianna Nowick 32  
Indian Leap St., Indian  
Orchard, MA; FORD  
VIN:1FMCU9E7XBKB17163  
Morgan LaBelle  
1013 Main St., W.  
Springfield, MA; FORD  
VIN:3FAHP01147R235409  
Tammy Handfield 6 Pleasant  
St., Ware, MA; MERCURY  
VIN:1MEHM42107G61014  
Christopher Forcier  
III 357 Taylor St.,  
Hardwick, MA; DODGE  
VIN:1B7HC16Y8SS290976  
Dana Dupuis 23 Andersen  
St., Three Rivers, MA; GMC  
VIN:1GKEK13T55J167343  
Daniel McMaster 114 Helberg  
RD Springfield, MA; HONDA  
VIN:1HGCP26878A067042  
Iderilca Rodrique 18 Alcott  
St., Worcester, MA; NISSAN  
VIN:JN1CA21D5XT809318  
Shawn Martin 9W Lake RD  
Easthampton, MA; FORD  
VIN:1FTNE24W1611B22247  
Rita Wilson 1102 Park St.,  
Palmer, MA. This auction is  
to take place on April 22, 2022,  
10:00 A.M. at LaBonte's &  
Son LLC, 241 Wilbraham St.,  
Palmer, MA 01069.

04/07, 04/14, 04/21/2022

Commonwealth of  
Massachusetts  
The Trial Court  
Probate and Family Court  
Hampden Division  
50 State Street  
Springfield, MA 01103  
(413)748-8600  
Docket No. HD22P0602EA  
Estate of:

Michael A. Boynton  
Date of Death:  
January 23, 2022  
INFORMAL PROBATE  
PUBLICATION NOTICE  
To all persons interest-  
ed in the above captioned  
estate, by Petition of Peti-  
tioner Pamela J. Stearns  
of Palmer, MA a Will has  
been admitted to informal  
probate.

Pamela J. Stearns  
of Palmer, MA has been  
informally appointed as the  
Personal Representative of  
the estate to serve **without  
surety** on the bond.

The estate is being  
administered under informal  
procedure by the Personal  
Representative under the  
Massachusetts Uniform Prob-  
ate Code without super-  
vision by the Court. Inven-  
tory and accounts are not  
required to be filed with the  
Court, but interested parties  
are entitled to notice regard-  
ing the administration from  
the Personal Representative  
and can petition the Court  
in any matter relating to  
the estate, including distribu-  
tion of assets and expenses  
of administration. Interest-  
ed parties are entitled to peti-  
tion the Court to institute  
formal proceedings and to  
obtain orders terminating  
or restricting the powers of  
Personal Representatives  
appointed under informal  
procedure. A copy of the  
Petition and Will, if any, can  
be obtained from the Peti-  
tioner.  
04/07/2022

**Please check  
the accuracy of  
your legal notice  
prior to submis-  
sion (i.e., date,  
time, spelling).  
Also, be sure  
the requested  
publication date  
coincides with  
the purpose of the  
notice, or as the  
law demands.  
Thank you.**

## Classifieds

12 WEEKLY NEWSPAPERS | SERVING 50 LOCAL COMMUNITIES

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COMMUNITY MARKETPLACE

Call us at 413.283.8393

## FOR SALE

**ANTIQUE AND PERIOD CHAIRS**  
- Restored with new woven seats -  
Many styles and weaves available. Call  
(413)289-6670

## ESTATE SALE

**ESTATE SALE** 105 Railroad St.,  
Belchertown. Saturday April 16th  
9-5 and Sunday April 17th 10-4. Yard  
equipment, lawn mower, dressers,  
furniture, dishes, glassware, cooking  
items, sewing machine, slide projector,  
retro end tables, lamps, patio furniture,  
desk, loveseat, sectional couch, stereo  
system, kitchen table, chairs(2) and  
much more. Cash/Carry.

## FIREWOOD

All Oak Cut/Spilt/Delivered. Money  
for your trees. Licensed Forester.  
(508)335-8042

## FIREWOOD

Fresh cut & split \$180.00  
Seasoned cut & split \$240.00  
All hardwood.  
Tree length available  
\*Also have seasoned softwood for  
outdoor boilers (Cheap). Quality & vol-  
umes **guaranteed!!** New England  
Forest Products (413)477-0083

**!!!!FRESH CUT!!!!** Over a cord  
guaranteed. Cut, Split, Prompt deliv-  
ery. Call D & D Cordwood (413)348-  
4326.

## WANTED

**OLD CARPENTER TOOLS** want-  
ed. Planes, chisels, axes, etc. Vintage  
hunting, camping, cast iron cookware,  
advertising, motorcycles, clothing. Call  
Ken (413)433-2195.

**Post your  
job openings  
in our  
classifieds.**  
We get results!

## WANTED

## WANTED TO BUY

**FIELDSTONE WALLS WANT-**  
**ED** to buy. Looking to purchase  
large quantities of old stone walls.  
Please call R.E. Barnes Fieldstone  
(978)807-0746

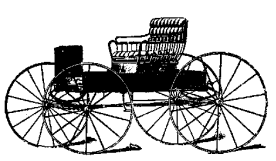
**WE BUY HOUSES!!!** Any condition.  
Easy and fast closing terms. Mill Road  
Properties (413)530-1299Jim

## SERVICES

**A B Hauling and  
Removal Service**

**2\*\*\*\*\*A & B HOUSEHOLD  
REMOVAL SERVICE\*\*\*\*\***  
Cellars, attics, garages cleaned, yard  
debris. Barns & sheds demolished.  
Swimming pools removed. Cheap-  
er than dumpster fees and we do all  
the work. Lowest rates. Fully insured.  
(413)283-6512, cell (413)222-  
8868.

**BILODEAU AND SON ROOFING.**  
Established 1976. New re-roofs and  
repairs. Gutter cleanings and repairs.  
Licensed/ insured. Call (413)967-  
6679



**WE RENOVATE, SELL & PUR-**  
**CHASE** (any condition) horse drawn  
vehicles such as sleighs, carriages,  
surreys, wagons, dr's buggies, drive-  
able or lawn ornaments. Some furni-  
ture and other restoration services  
available. Reasonable prices. Quality  
workmanship. Call (413)213-0373  
for estimate and information.

**DEMERS & SONS  
BELCHERTOWN, MA**

## SERVICES

**CHAIR SEAT WEAVING** & refinish-  
ing - cane, fiber rush & splint - Class-  
room instructor, 20+ years experience.  
Call Walt at (413)289-6670 for est-  
imate.

**PAINT AND PAPER** Over 25 years  
experience. References. Lic #086220.  
Please call Kevin 978-355-6864.

## APPLIANCES

**JOHN SHEA'S APPLIANCE RE-**  
**PAIR** Get it done right!!! Same day  
service. 508-867-7124, 774-200-  
1391 Check us out on facebook

## CHILD SERVICES

**\*NEW STATE LAW.** Anyone adver-  
tising caring of children must list a li-  
cense number to do so if they offer this  
service in their own home.

## ELECTRICIAN

**DEPENDABLE ELECTRICIAN,**  
**FRIENDLY** service, installs deicing  
cables. Free estimates. Fully insured.  
Scott Winters electrician Lic. #13514-B  
Call (413)244-7096.

HOME  
IMPROVEMENT

**CERAMIC TILE INSTALLATION**  
Kitchen, bath, foyers. Referenc-  
es. Lic #086220. Please call Kevin  
(978)355-6864.

**HOME IMPROVEMENTS. RE-**  
**MODELING** Kitchens, baths. Ceram-  
ic tile, windows, painting, wallpapering,  
siding, decks. Insurance work. Fully  
insured. Free estimates. (413)246-  
2783 Ron.

PLEASE RECYCLE THIS NEWSPAPER



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ACCOUNTING SERVICES**  
For Full Accounting & Tax Service  
Registered Tax Return Preparer  
228 West St., Ware, MA 01082  
**413-967-8364**  
The IRS does not endorse any particular individual tax return preparer.  
For more information on tax preparers go to irs.gov.

Personal & Small Business Federal & All States  
**FAST TAX USA**  
TAX PREPARATION SERVICE  
413 324-2135  
IRS Certified Tax Preparers  
Independently owned and operated. Over 25 years experience.  
1622 North Main Street, Palmer, MA 01069  
Fasttax@charter.net  
Free E-File & Direct Deposit

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488 Newton St., South Hadley, MA 01075  
**413-532-9426**  
www.downeycpa.com

**Kitchen Table Taxes**  
Personal & Small Business Tax Returns  
"David The Tax Man"  
Tel: 413-289-0058  
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**CALL 413-283-8393 TO PLACE YOUR AD TODAY!**

## FILL OUT AND MAIL THIS MONEY MAKER

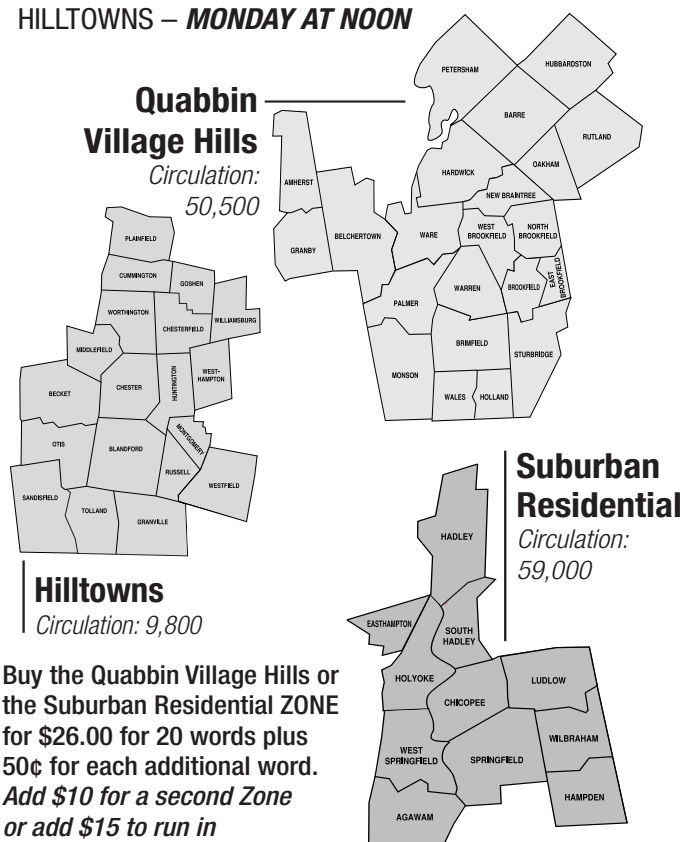
**MAIL TO: Classifieds, 24 Water St., Palmer, MA 01069**  
or call: 413-283-8393

**DEADLINES:** QUABBIN & SUBURBAN – **FRIDAY AT NOON**  
HILLTOWNS – **MONDAY AT NOON**

CATEGORY:			
1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	Base Price \$26.50	22	Base Price \$27.00
23	Base Price \$27.50	24	Base Price \$28.00
25	Base Price \$28.50	26	Base Price \$29.00
27	Base Price \$29.50	28	Base Price \$30.00
29	Base Price \$30.50	30	Base Price \$31.00
31	Base Price \$31.50	32	Base Price \$32.00
33	Base Price \$32.50	34	Base Price \$33.00
35	Base Price \$33.50	36	Base Price \$34.00
37	Base Price \$34.50	38	Base Price \$35.00
39	Base Price \$35.50	40	Base Price \$36.00

Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
Address: \_\_\_\_\_  
Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Number of Weeks: \_\_\_\_\_ X per week rate = \$ \_\_\_\_\_  
Credit Card: ☐ MasterCard ☐ VISA ☐ Discover ☐ Cash ☐ Check# \_\_\_\_\_  
Card #: \_\_\_\_\_ Exp. Date \_\_\_\_\_ CVV \_\_\_\_\_  
Amount of charge: \_\_\_\_\_ Date: \_\_\_\_\_

OUR CLASSIFIEDS REACH 50 COMMUNITIES EVERY WEEK!



Buy the Quabbin Village Hills or  
the Suburban Residential ZONE  
for \$26.00 for 20 words plus  
50¢ for each additional word.  
Add \$10 for a second Zone  
or add \$15 to run in  
**ALL THREE ZONES.**

First ZONE base price \_\_\_\_\_ Includes additional words  
Add a second ZONE **\$10.00**  
Add a third ZONE **\$5.00**  
Subtotal \_\_\_\_\_  
x Number of Weeks \_\_\_\_\_  
TOTAL Enclosed \_\_\_\_\_

Run my ad in the  
following ZONE(s):  
☐ Quabbin  
☐ Suburban  
☐ Hilltowns

## Islam, Ashfin

---

**From:** no-reply@e-hps.com  
**Sent:** Tuesday, April 5, 2022 2:53 PM  
**To:** Islam, Ashfin  
**Subject:** TURLEY PUBLICATIONS INC - Heartland Gateway Transaction Receipt

TURLEY PUBLICATIONS INC  
24 WATER ST  
PALMER, MA 01069  
413-283-8393

Please see the details of your transaction below.

Date: 4/5/2022                      Time: 2:52 PM

Transaction Type:	Credit Sale
Transaction ID:	1366723209
Customer Name:	██████████
Account:	*****4138
Card Type:	Visa
Entry Method:	Manual
Invoice Number:	PJ LEGAL
Authorization Code:	00197C
Result:	Approved
Clerk ID:	Patrick Turley
Description:	COMMUNITY OUTREACH MEETING
Subtotal Amount:	\$228.59
Tip Amount:	\$0.00
Surcharge Amount:	\$0.00
Total Amount:	\$228.59

Attachment B

Notice Filed with Municipality

## Islam, Ashfin

---

**From:** Susan Coache <scoache@townofpalmer.com>  
**Sent:** Thursday, April 14, 2022 10:42 AM  
**To:** Islam, Ashfin  
**Subject:** RE: Notice of Silver Therapeutics of Palmer Virtual Community Outreach Meeting April 20, 2022  
**Attachments:** 20220414\_094938.pdf

Ashfin, Notice stamped and posted.. Stay well, Susan

---

**From:** Islam, Ashfin <aislam@princelobel.com>  
**Sent:** Thursday, April 14, 2022 10:19 AM  
**To:** Susan Coache <scoache@townofpalmer.com>  
**Subject:** Notice of Silver Therapeutics of Palmer Virtual Community Outreach Meeting April 20, 2022

Good Morning Ms. Coache,

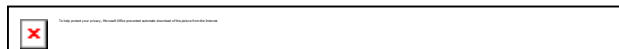
I hope all is well since the last time we spoke!

I am looking to give the Town Clerk's Office notice of an upcoming community outreach meeting regarding Silver Therapeutics of Palmer's Marijuana Establishment at 1235 Thorndike Street. See attached. Can you email me back a date-stamped copy to confirm receipt, or respond to this email confirming that the attached notice has been received? Are you also able to post this in Town Hall, if open to the public?

Thank you in advance for your assistance!

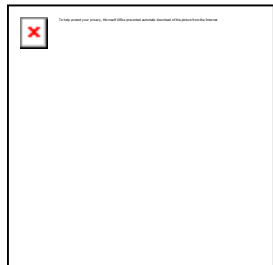
Ashfin

### Ashfin Islam



Prince Lobel Tye LLP  
One International Place, Suite 3700  
Boston, Massachusetts 02110

617 456 8165 Direct  
617 515 3272 Mobile  
[aislam@princelobel.com](mailto:aislam@princelobel.com)



**LEGAL NOTICE OF A COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY**

**Silver Therapeutics of Palmer, Inc.**

Notice is hereby given that a virtual community outreach meeting for **Silver Therapeutics of Palmer, Inc.'s proposed Marijuana Establishment** is scheduled for **April 20, 2022, at 5:00 p.m.**, online at <https://princelobel.zoom.us/j/88415198726> or by telephone by calling +1 301 715 8592, Webinar ID: 884 1519 8726. The proposed Marijuana Retailer is anticipated to be located at **1235 Thorndike Street, Palmer, Massachusetts 01069** (the "**Property**"). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of Silver Therapeutics of Palmer, Inc.

Questions may be submitted in advance to [hello@agtherapeutics.com](mailto:hello@agtherapeutics.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting at [princelobel.com](http://princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the town clerk, the planning board, and the contracting authority for the municipality, at Town Hall, 4417 Main Street, Palmer, Massachusetts 01069. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.

TOWN OF PALMER, MA  
TOWN CLERK'S OFFICE  
2022 APR 14 AM 10:33

## Islam, Ashfin

---

**From:** Linda Leduc <lleduc@townofpalmer.com>  
**Sent:** Thursday, April 14, 2022 11:56 AM  
**To:** Islam, Ashfin  
**Subject:** RE: Notice of Silver Therapeutics Virtual Community Outreach Meeting April 20, 2022

Hi Ashfin,

The notice has been received. Thank you!

I have also shared it with the Planning Board.

Best,

Linda

Linda G. Leduc  
Town Planner/Economic Development Director  
Town of Palmer  
4417 Main Street  
Palmer, MA 01069  
(413) 283-2605  
fax (413) 283-2637

Office Hours  
Monday: 8:30a-730p  
Tues-Thurs: 8:30a-4:30p  
Friday: CLOSED

---

**From:** Islam, Ashfin <aislam@princelobel.com>  
**Sent:** Thursday, April 14, 2022 10:25 AM  
**To:** Linda Leduc <lleduc@townofpalmer.com>  
**Subject:** Notice of Silver Therapeutics Virtual Community Outreach Meeting April 20, 2022

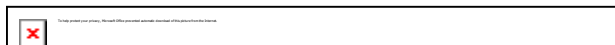
Good Morning,

I am looking to give the Town Planning and Economic Development's Office notice of an upcoming community outreach meeting regarding Silver Therapeutics of Palmer's Marijuana Establishment at 1235 Thorndike Street. See attached. Can you email me back a date-stamped copy to confirm receipt, or respond to this email confirming that the attached notice has been received?

Thank you in advance for your assistance!

Ashfin

**Ashfin Islam**



Prince Lobel Tye LLP  
One International Place, Suite 3700

## Islam, Ashfin

---

**From:** Islam, Ashfin  
**Sent:** Thursday, April 14, 2022 10:23 AM  
**To:** 'rmcnutt@townofpalmer.com'  
**Subject:** Notice of Silver Therapeutics Virtual Community Outreach Meeting April 20, 2022  
**Attachments:** Silver Therapeutics - Palmer 4.20.2022 Outreach Meeting Notice V.1.pdf

Hi Ryan,

I hope all is well since the last time we spoke!

I am looking to provide notice of an upcoming community outreach meeting regarding Silver Therapeutics of Palmer's Marijuana Establishment at 1235 Thorndike Street. See attached. Can you email me back a date-stamped copy to confirm receipt, or respond to this email confirming that the attached notice has been received?

Additionally, we need confirmation that the town is ok with Silver Therapeutics Hosting a virtual community outreach meeting. The state regulation authorizing virtual outreach meetings has been extended until July 2022.

Thank you in advance for your assistance,

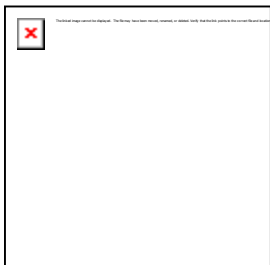
Ashfin

Ashfin Islam



Prince Lobel Tye LLP  
One International Place, Suite 3700  
Boston, Massachusetts 02110

617 456 8165 Direct  
617 515 3272 Mobile  
[aislam@princelobel.com](mailto:aislam@princelobel.com)



## Attachment C

### Examples of Abutter Notices

**LEGAL NOTICE OF A COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY**

**Silver Therapeutics of Palmer, Inc.**

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Questions may be submitted in advance to [hello@agtherapeutics.com](mailto:hello@agtherapeutics.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting at [princelobel.com](http://princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the town clerk, the planning board, and the contracting authority for the municipality, at Town Hall, 4417 Main Street, Palmer, Massachusetts 01069. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.

Parcel ID	Owner Add	Owner City	Owner Stat	Owner Zip	Address
73-57	PO BOX 96	PALMER	MA	1069	25 WARE ST (THOR)
74-37	149 DALE S	CHICOPEE	MA	1020	BRECKENRIDGE ST (PALM)
74-32	740 LANCA	WHITEFIEL	NH	3598	101 WARE ST (THOR)
19-8	740 LANCA	WHITEFIEL	NH	03598	306 L8 BRECKENRIDGE ST (PALM)
73-58	PO BOX 84	PALMER	MA	01069	008 1235 THORNDIKE ST (PALM)
73-59	P O BOX	SPRINGFIEL	MA	1101	WARE ST (THOR)
73-14-1	P O BOX 17	SPRINGFIEL	MA	1101	WARE ST (THOR)
19-23	1075 GLEN	WILBRAHA	MA	1095	1225 THORNDIKE ST (PALM)
73-14	1212 THOR	PALMER	MA	1069	1212 THORNDIKE ST (PALM)

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 29	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$
Sent to: 740 LANCASTER RD WHITEFIELD, NH 03598	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 36	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: 740 LANCASTER RD WHITEFIELD, NH 03598	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 43	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$
Sent to: PO BOX 84 PALMER, MA 01069	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 50	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: PO BOX SPRINGFIELD, MA 01101	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 67	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: PO BOX 1730 SPRINGFIELD, MA 01101	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 74	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: 1075 GLENDALE RD WILBRAHAM, MA 01095	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 81	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: 1212 THORNDIKE STREET PALMER, MA 01069	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 05	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent to: PO BOX 968 PALMER, MA 01069	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

U.S. Postal Service® CERTIFIED MAIL® RECEIPT Domestic Mail Only	
USPS® ARTICLE NUMBER	
9414 7266 9904 2186 6548 12	
Certified Mail Fee	\$
Return Receipt (Hardcopy)	\$
Return Receipt (Electronic)	\$
Certified Mail Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$
Sent to: 149 DALE ST UNIT Q CHICOPEE, MA 01020	
Reference Information	
Ashfin Islam 109577-019	
PS Form 3800, Facsimile, July 2015	

## Attachment D

Link to Recorded Virtual Meeting

## Attachment D

Link to recording of virtual community outreach meeting:

Topic: Silver Therapeutics of Palmer Virtual Community Outreach Meeting

Start Time : April 20, 2022 05:00 PM

Meeting Recording:

[https://princelobel.zoom.us/rec/share/fP-\\_aBAGZLqPSnN5cu1YZbcskV3qBxVaPI7bU6HiFluoWWaALR53EnKPP6v7qSUY.uZCeLu-AOppCd3OB?startTime=1650488118000](https://princelobel.zoom.us/rec/share/fP-_aBAGZLqPSnN5cu1YZbcskV3qBxVaPI7bU6HiFluoWWaALR53EnKPP6v7qSUY.uZCeLu-AOppCd3OB?startTime=1650488118000)

Passcode: SilverPalmer2022!

List of Attendees:

Moderator and Project Team: 3

Public Participants: 4

## Attachment E

### Virtual Meeting Presentation Handouts

Note - no presentation materials/handouts used for the Virtual Meeting.

## Silver Therapeutics of Palmer, Inc.

### Plan for Positive Impact

Silver Therapeutics of Palmer, Inc. (the “**Company**”) is proposing to site a Retail Marijuana Establishment in Palmer, MA, located in Hampden County. Accordingly, the Company plans to focus its primary efforts within the City of Springfield, the Town of Holyoke and the Town of Spencer, which are identified by the Commission as areas of disproportionate impact, as well as efforts to positively impact surrounding communities in Hampden County, as well as impact Massachusetts Residents who have, or have parents or spouses who have, past drug convictions (the “**Target Areas**”).

During its first year of operations, the Company will implement the following goals, programs and measurements pursuant to this Plan for Positive Impact (the “**Positive Impact Plan**”).

#### Goals:

The Company’s goals for this Positive Impact Plan are as follows:

1. Hire, in a legal and non-discriminatory manner, at least 25% of its employees from Target Areas including Springfield, Holyoke and Spencer, and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions, and;
2. Provide educational programs and informational sessions geared towards individuals from the Target Area and/or Massachusetts Residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry, with specific focuses on marijuana cultivators, product manufactures or retailers and entrepreneurship, at least twice a year. Such educational events will specifically include, but not be limited to, information on licensing workshops (i.e. guidance on filing applications with the Commission), preparation of standard operating policies and procedures, Massachusetts cannabis market overview, and METRC best practices.

#### Programs:

In an effort to reach the abovementioned goals, the Company shall implement the following practices and programs:

1. In an effort to ensure that the Company has the opportunity to interview, and hire, individuals from the Target Areas or Massachusetts residents who have past drug convictions it shall post monthly notices for at least three (3) months during the hiring process at the municipal offices of the Target Areas and in newspapers of general circulation in the Target Areas, including but not limited to, the Daily Hampshire Gazette, the Sun and the Republican, and these notices will state, among other things, that the Company is specifically looking for Massachusetts residents who are 21 years or older and either (i) live in a Target Area or another area of disproportionate impact as defined by the Commission; or (ii) have past drug convictions, for employment.

## Silver Therapeutics of Palmer, Inc.

Such residency, or prior drug conviction status, will be a positive factor in hiring decisions, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

2. In an effort to ensure that the Company provides opportunities for individuals from the Target Areas and/or Massachusetts residents who have past drug convictions to attend its educational events the Company shall post weekly notices at least two (2) weeks prior to hosting said educational programs or informational sessions in newspapers of general circulation in the Target Areas including but not limited to, the Daily Hampshire Gazette, the Sun and the Republican, and these notices will state, among other things, that the Company is specifically looking for Massachusetts residents who are 21 years or older and either (i) live in a Target Area or another area of disproportionate impact as defined by the Commission; or (ii) have past drug convictions to attend these events.

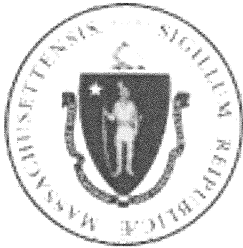
The Company respectfully submits that it will comply with the advertising, branding, marketing and sponsorship practices as outlined in 935 CMR 500.105(4). The abovementioned notices will not include any Company advertisements, marketing materials or branding. To the extent the Commission deems necessary, notices and event programming materials will be made available to the Commission for review and inspection prior to publishing.

### **Annual Review:**

Each year, the Company will review the following criteria in an effort to measure the success of its Positive Impact Plan.

1. Identify the number of individuals hired who (i) came from Target Areas, or other areas of disproportionate impact as defined by the Commission; or (ii) have past drug convictions;
2. Identify the number of educational events or informational sessions it holds and attendance at the same.

The Company affirmatively states that it: (1) acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; (2) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws; and (3) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of its provisional license.



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$250.00

Secretary of the Commonwealth, Corporations Division  
One Ashburton Place, 17th floor  
Boston, MA 02108-1512  
Telephone: (617) 727-9640

**Articles of Organization**

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001493853

**ARTICLE I**

The exact name of the corporation is:

SILVER THERAPEUTICS OF PALMER, INC.

**ARTICLE II**

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION.

**ARTICLE III**

State the total number of shares and par value, if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$0.01000	100	\$1.00	100

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

**ARTICLE IV**

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

**ARTICLE V**

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

NONE

**ARTICLE VI**

Other lawful provisions, and if there are no provisions, this article may be left blank.

**Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.**

#### ARTICLE VII

The effective date of organization and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a *later* effective date is desired, specify such date, which may not be later than the *90th day* after the articles are received for filing.

**Later Effective Date: Time:**

#### ARTICLE VIII

The information contained in Article VIII is not a permanent part of the Articles of Organization.

**a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:**

Name: NORTHWEST REGISTERED AGENT SERVICE  
No. and Street: 82 WENDELL AVENUE, SUITE 100  
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

**c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA
TREASURER	BRENDAN MCKEE	15 DUNDEE ROAD QUINCY, MA 02171 USA
SECRETARY	JOSHUA FERRANTO	725 HIGHLAND AVENUE SOUTH PORTLAND, ME 04106 USA
DIRECTOR	BRENDAN MCKEE	15 DUNDEE ROAD QUINCY, MA 02171 USA
DIRECTOR	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA
DIRECTOR	JOSHUA FERRANTO	725 HIGHLAND AVENUE SOUTH PORTLAND, ME 04106 USA

**d. The fiscal year end (i.e., tax year) of the corporation:**  
December

**e. A brief description of the type of business in which the corporation intends to engage:**

APPLYING FOR A LICENSE WITH THE CCC.

**f. The street address (post office boxes are not acceptable) of the principal office of the corporation:**

No. and Street: 89 COURT STREET

City or Town: SARATOGA SPRINGS State: NY Zip: 12866 Country: USA

**g. Street address where the records of the corporation required to be kept in the Commonwealth are located (*post office boxes are not acceptable*):**

No. and Street: 82 WENDELL AVENUE, SUITE 100

City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

**which is**

☐ its principal office

☐ an office of its transfer agent

☐ an office of its secretary/assistant secretary

☒ its registered office

**Signed this 12 Day of March, 2021 at 12:54:13 PM by the incorporator(s).** (*If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.*)

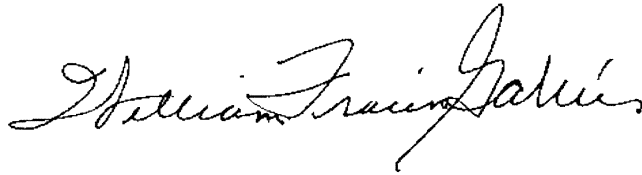
JOSHUA SILVER, INCORPORATOR

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are

deemed to have been filed with me on:

March 12, 2021 12:53 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

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**BYLAWS  
OF  
SILVER THERAPEUTICS OF PALMER, INC.**

**ARTICLE I  
OFFICES AND RECORDS**

**Section 1.1. REGISTERED OFFICE AND AGENT.** The registered office and registered agent of the Corporation shall be as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth. The Board of Directors may at any time change the registered office or the registered agent by making the appropriate filing with the Secretary of the Commonwealth.

**Section 1.2. PRINCIPAL OFFICE.** The principal office of the Corporation shall be within or without the Commonwealth of Massachusetts as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth.

**Section 1.3. OTHER OFFICES.** The Corporation may also have other offices at any places, within or without the Commonwealth of Massachusetts, as the Board of Directors may designate, or as the business of the Corporation may require or as may be desirable.

**Section 1.4. BOOKS AND RECORDS.** Any records maintained by the Corporation in the regular course of its business, including its share ledger, books of account and minute books, may be maintained on any information storage device or method; provided that the records so kept can be converted into clearly legible paper form within a reasonable time. The Corporation shall convert any records so kept upon the written request of any person entitled to inspect such records pursuant to applicable law.

**ARTICLE II  
SHAREHOLDERS**

**Section 2.1. PLACE OF MEETING.** Meetings of the shareholders may be held at any place, within or without the Commonwealth of Massachusetts, as shall be fixed by the Board of Directors. The Board of Directors may determine, in its discretion, that any meeting of the shareholders may be held solely by means of remote communication in accordance with Section 2.2 of these Bylaws, without designating a place for a physical assembly of shareholders.

**Section 2.2. MEETINGS OF SHAREHOLDERS BY REMOTE COMMUNICATION.** The Board of Directors may authorize shareholders to participate in a meeting of shareholders by means of remote communication, subject to the conditions imposed by applicable law and any guidelines and procedures adopted by the Board of Directors. At any meeting in which shareholders can participate by means of remote communication, the Corporation shall implement reasonable measures to:

(a) verify that each person participating remotely is a shareholder or a shareholder's proxy; and

(b) provide such shareholders and proxies a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to communicate, and to read or hear the proceedings of the meeting, substantially concurrently with such proceedings.

The Corporation shall maintain a record of the vote or other action taken by shareholders or proxy holders at the meeting by means of remote communication.

**Section 2.3. ANNUAL MEETING.** An annual meeting of shareholders, for the purpose of electing directors and transacting any other business as may be brought before the meeting, shall be held on the date and time fixed by the Board of Directors and stated in the notice of the meeting.

Failure to hold the annual meeting at the designated time shall not affect the validity of any action taken by the Corporation. If the Board of Directors fails to call the annual meeting of shareholders as required by these Bylaws, any shareholder may make a demand in writing to any officer of the Corporation that an annual meeting be held.

**Section 2.4. SPECIAL MEETINGS.** Special meetings of the shareholders may be called:

(a) by the Board of Directors; or

(b) upon the demand of the holders of at least forty percent (40%) of all the votes entitled to be cast on any issue proposed to be considered at the proposed special meeting.

Only business within the purposes described in the Corporation's meeting notice may be conducted at a special meeting of the shareholders.

**Section 2.6. RECORD DATE FOR SHAREHOLDER ACTION.** For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be:

(a) on the date fixed by the Board of Directors in the notice of the meeting;

(b) at the close of business on the day before the first notice is delivered to shareholders, if no date is fixed by the Board of Directors; or

(c) on the day before the shareholders' meeting, if no notice of meeting is mailed to shareholders and no record date is otherwise supplied by the Massachusetts Business Corporation Act.

For action by consent of the shareholders without a meeting, the record date for shareholders entitled to approve the action subject of the consent shall be:

(x) on the date fixed by the Board of Directors; or

(y) the date that the first shareholder signs the written consent, if no date is fixed by the Board of Directors.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the

meeting unless the Board of Directors fixes a new record date, which it shall do if the meeting is adjourned to a date more than one hundred twenty (120) days after the date fixed for the original meeting.

**Section 2.7. NOTICE OF SHAREHOLDERS' MEETING.** Written notice of any annual or special meeting of shareholders shall be given to any shareholder entitled to notice not less than seven (7) days nor more than sixty (60) days before the date of the meeting. Such notice shall state:

- (a) the time and date of the meeting;

- (b) the place of the meeting, if any;

- (c) if remote communication is authorized for the meeting, the information required for shareholders (i) to participate, be considered present, and vote at the meeting, and (ii) to access the shareholders' list for the meeting as provided by Section 2.8 of these Bylaws; and

- (d) the purpose or purposes of the meeting, unless the meeting is an annual meeting with no purpose other than the election of directors.

The corporation shall give notice to any shareholder entitled to notice by (x) mail or (y) electronic transmission if consented to by the shareholder.

Any person entitled to notice of a meeting may sign a written waiver of notice either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person attends for the specific purpose of objecting to the lawfulness of the convening of the meeting.

**Section 2.8. SHAREHOLDERS LIST FOR MEETING.** After fixing a record date for a shareholders' meeting, a corporation shall prepare an alphabetical list of the names of all its shareholders who are entitled to notice of the meeting. The list shall be arranged by voting group, and within each voting group by class or series of shares, and show the address of and number of shares held by each shareholder, but need not include an electronic mail address or other electronic contact information for any shareholder.

The Corporation shall make the list available for inspection by any shareholder, beginning two (2) business days after notice of the meeting is given (a) at the Corporation's principal office or at a place identified in the meeting notice in the city where the meeting will be held; or (b) on a reasonably accessible electronic network, provided that the information required to gain access to such list is provided with the notice of the meeting. If the meeting is to be held solely by means of remote communication, the list shall be made available on an electronic network. In the event the corporation determines or is required to make the list available on an electronic network, the corporation may take reasonable steps to ensure that such information is available only to shareholders of the corporation.

**Section 2.9. QUORUM OF SHAREHOLDERS.** At each meeting of shareholders for the transaction of any business, a quorum must be present to organize such meeting. A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person, by

remote communication, or by proxy. A voting group includes all shares of one or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless: (a) the shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting; or (b) the meeting is adjourned and a new record date is set for the adjourned meeting.

The shareholders in a voting group represented in person, by remote communication, or by proxy at a meeting of shareholders, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than one hundred twenty (120) days after the date fixed for the original meeting, a new quorum for the meeting must be established.

**Section 2.10. CONDUCT OF MEETINGS.** The Board of Directors of the Corporation may adopt by resolution rules and regulations for the conduct of meetings of the shareholders, as it deems appropriate. At every meeting of the shareholders, the Chairman of the Board of Directors, or in his or her absence or inability to act, a director or officer designated by the Board of Directors, shall act as the presiding officer of the meeting. The Secretary or, in his or her absence or inability to act, the person whom the chair of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

**Section 2.11. VOTING OF SHARES.** Each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote at a meeting of shareholders, except to the extent that the Articles of Organization provide for more or less than one vote per share or limits or denies voting rights to the holders of the shares of any class or series.

If a quorum of a voting group exists, favorable action on a matter, other than the election of directors, will be approved by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater or lesser number of votes is required by law or a greater number of votes is required by the Articles of Organization, these Bylaws or a resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups.

Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present. In the election of directors, each outstanding share, regardless of class, is entitled to one vote for as many persons as there are directors to be elected

at that time and for whose election the shareholder has a right to vote, unless the Articles of Organization provide otherwise.

In each election for directors, every shareholder entitled to vote at the election shall have the right to (a) multiply the number of votes to which such shareholder may be entitled by the total number of directors to be elected in the same election by the holders of the class or classes of shares of which such shareholder's shares are a part, and (b) cast the whole number of such votes for one candidate or distribute them among any two or more candidates.

No ballot shall be required for the election of directors unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

**Section 2.12. VOTING BY PROXY OR NOMINEE.** Shares of the Corporation's stock owned by the Corporation itself or by another corporation or entity, the majority of the voting stock or interest of which is owned or controlled by the Corporation, shall not be voted, directly or indirectly, at any meeting, and shall not be counted in determining the total number of outstanding shares at any given time. Nothing in this section shall be construed as limiting the right of the Corporation or any domestic or foreign corporation or other entity to vote shares, held or controlled by it in a fiduciary capacity, or with respect to which it otherwise exercises voting power in a fiduciary capacity.

A shareholder may vote either in person or by proxy executed in writing by the shareholder or his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized by the Corporation to tabulate votes. No proxy shall be valid after eleven (11) months from the date of its execution unless otherwise provided in the proxy. A proxy shall be revocable unless the proxy form conspicuously states that the proxy is irrevocable and the proxy is coupled with an interest as defined in the Massachusetts Business Corporations Act. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment.

Shares owned by another corporation, domestic or foreign, may be voted by any officer, agent, or proxy as the bylaws of that corporation may authorize or, in the absence of authorization, as the Board of Directors of that corporation may determine.

A person holding shares in a representative or fiduciary capacity may vote such shares without a transfer of such shares into such person's name. However, the Corporation may (a) request that the person provides evidence of this capacity acceptable to the Corporation, or (b) establish a procedure by which the beneficial owner of shares that are registered in the name of a nominee is recognized by the Corporation as the shareholder.

**Section 2.13. ACTION BY SHAREHOLDERS WITHOUT A MEETING.** Any action required or permitted to be taken at any annual or special meeting of shareholders may be taken without a meeting, if a consent or consents in writing, setting forth the action so taken, shall have been signed by the holder or holders of shares with at least the minimum number of votes necessary

to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that (a) describe the action taken, (b) are signed by shareholders having the requisite votes, (c) bear the date of the signatures of such shareholders, and (d) are delivered to the Corporation for inclusion with the records of meetings within sixty (60) days of the earliest dated consent delivered to the Corporation.

If the action to be taken pursuant to the consent of voting shareholders without a meeting is one for which notice to all shareholders would be required by law if the action were to be taken at a meeting, then the Corporation shall, at least seven (7) days before the action is taken, give notice in the manner specified by Section 2.7 to all nonvoting shareholders.

### **ARTICLE III DIRECTORS**

**Section 3.1. BOARD OF DIRECTORS.** All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Directors need not be residents of the Commonwealth of Massachusetts or shareholders of the Corporation.

**Section 3.2. NUMBER OF DIRECTORS.** The number of directors shall be three (3), provided that the number may be increased or decreased from time to time by an amendment to these Bylaws.

No decrease in the number of directors shall have the effect of shortening the term of any incumbent director.

**Section 3.3. TERM OF OFFICE.** At the first annual meeting of shareholders and at each annual meeting thereafter, the holders of shares entitled to vote in the election of directors shall elect directors to hold office until the next succeeding annual meeting, the director's successor has been selected and qualified, or the director's earlier death, resignation, or removal.

**Section 3.4. REMOVAL.** Directors may be removed from office at any time with or without cause by the shareholders entitled to elect them or for cause by vote of a majority of the directors then in office. A director may be removed by shareholders or directors only at a meeting called for that purpose, for which the notice must state that the purpose, or one of the purposes, of the meeting is removal of the director or directors.

If less than the entire board is to be removed, no one director may be removed if the votes cast against removal would be sufficient to elect the director if cumulatively voted at an election of the entire board.

**Section 3.5. RESIGNATION.** A director may resign at any time by giving notice in the form of an executed resignation to the Board of Directors, its Chair, or to the Corporation. A resignation

is effective when the notice is delivered unless the notice specifies a future date. Acceptance of the resignation shall not be required to make the resignation effective. The pending vacancy may be filled before the effective date in accordance with Section 3.6 of these Bylaws, but the successor shall not take office until the effective date.

**Section 3.6. VACANCIES.** Vacancies and newly created directorships, whether resulting from an increase in the size of the Board of Directors, or due to the death, resignation, disqualification or removal of a director or otherwise, may be filled by the affirmative vote of a majority of the remaining directors then in office, even though less than a quorum of the Board of Directors.

A vacancy that will occur at a specific later date may be filled before the vacancy occurs, but the new director may not take office until the vacancy occurs. Any director elected to fill a vacancy shall serve until the next shareholders' meeting at which directors are elected.

**Section 3.7. MEETINGS OF DIRECTORS.** An annual meeting of directors shall be held immediately and without notice after and at the place of the annual meeting of shareholders. Other regular and special meetings of the directors may be held at such times and places within or outside the Commonwealth of Massachusetts as the directors may fix.

Special meetings of the Board of Directors may be called by the President, by the Chair of the Board, if any, by the Secretary, by a majority of directors, or by one director in the event that there is only one director.

**Section 3.8. MEETINGS BY REMOTE COMMUNICATION.** The Board of Directors may permit any or all directors to participate in any meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by this means is considered to be present in person at the meeting.

**Section 3.9. NOTICE OF DIRECTORS' MEETINGS.** Regular meetings may be held without notice of the date, time, place, or purpose of the meeting. All special meetings of the Board of Directors shall be held upon not less than two (2) days' notice. Such notice shall state:

- (a) the date and time of the meeting;
- (b) the place of the meeting;
- (c) the means of any remote communication by which directors may participate at the meeting, if applicable; and
- (d) the purpose or purposes for which the meeting is called if the meeting is a special meeting.

The corporation or person calling the meeting shall give notice to each director by (x) mail or personal delivery or (y) electronic transmission if consented to by the director.

A written waiver of the required notice signed by a director entitled to the notice, before or after the meeting, is the equivalent of giving notice to the director who signs the waiver. A director's attendance at any meeting shall constitute a waiver of notice of the meeting, except where the

director attends a meeting for the express purpose of objecting to the transaction of any business on the grounds that the meeting is not lawfully called or convened.

**Section 3.10. QUORUM AND ACTION OF DIRECTORS.** A majority of the number of directors as currently fixed by the shareholders or Board of Directors shall constitute a quorum for the transaction of business. The act of the majority of the directors present at a meeting at which a quorum is present at the time of the act shall be the act of the Board of Directors, unless the vote of a greater number is required by law, the Articles of Organization, or these Bylaws.

The directors at a meeting for which a quorum is not present may adjourn the meeting until a time and place as may be determined by a vote of the directors present at that meeting. When a meeting is adjourned, it shall not be necessary to give any notice of the adjourned meeting, or of the business to be transacted at the adjourned meeting, other than by announcement at the meeting at which the adjournment is taken.

**Section 3.11. COMPENSATION.** Directors shall not receive any stated salary for their services, but the Board of Directors may provide, by resolution, a fixed sum and expenses of attendance, if any, for attendance at any meeting of the Board of Directors or committee thereof. A director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity.

**Section 3.12. ACTION BY DIRECTORS WITHOUT A MEETING.** Unless otherwise provided by the Articles of Organization or these Bylaws, any action required or permitted to be taken at a meeting of the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors, or all committee members then appointed, consent to such action in writing or by electronic transmission and the writings or electronic transmissions are filed with the minutes of the proceedings of the Board of Directors.

**Section 3.13. COMMITTEES OF THE BOARD OF DIRECTORS.** The Board of Directors, by resolution adopted by a majority, may designate one or more directors to constitute one or more committees, to exercise the authority of the Board of Directors to the extent provided in the resolution of the Board of Directors and allowed under the law of the Commonwealth. A committee of the Board of Directors does not have the authority to:

- (a) authorize distributions;
- (b) approve or propose to shareholders action that this chapter requires be approved by shareholders, including an amendment to the Articles of Organization;
- (c) change the number of the Board of Directors, remove directors from office or fill vacancies on the Board of Directors, or
- (d) adopt, amend, or repeal the Bylaws of the Corporation.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

## **ARTICLE IV OFFICERS**

**Section 4.1. POSITIONS AND APPOINTMENT.** The officers of the Corporation shall be appointed by the Board of Directors and shall be a President, a Treasurer, a Secretary, and any other officers, including assistant officers and agents, as may be deemed necessary by the Board of Directors. The Board of Directors may authorize an officer to appoint one or more officers or assistant officers. Any two or more offices may be held by the same person.

Officers shall be elected annually at the meeting of the Board of Directors held after each annual shareholder's meeting. Each officer shall serve until a successor is elected and qualified or until the death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors. Election or appointment of an officer or agent shall not of itself create contract rights.

**Section 4.2. REMOVAL AND RESIGNATION.** Any officer appointed or elected by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors at any regular or special meeting. Any officer or assistant officer appointed by an authorized officer may be removed at any time with or without cause by any officer with authority to appoint such officer or assistant officer. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer may resign at any time by delivering written notice to the Corporation. Resignation is effective when the notice is delivered unless the notice provides a later effective date.

Any vacancies may be filled in accordance with Section 4.1 of these Bylaws.

**Section 4.3. POWERS AND DUTIES OF OFFICERS.** The powers and duties of the officers of the Corporation shall be as provided from time to time by resolution of the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Corporation subject to the control of the Board of Directors.

## **ARTICLE V INDEMNIFICATION OF DIRECTORS AND OFFICERS**

The Corporation shall indemnify a director or officer who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she was a director or officer of the Corporation against reasonable expenses incurred by him or her in connection with the proceeding.

The Corporation may, to the fullest extent permitted by law, indemnify each person who may serve or who has served at any time as a director or officer of the Corporation or of any of its subsidiaries, or who at the request of the Corporation may serve or at any time has served as a director, officer, administrator or trustee of, or in a similar capacity with, another organization

or any employee benefit plan, against all expenses and liabilities, including counsel fees, reasonably incurred by or imposed upon such person in connection with any proceeding in which he may become involved by reason of his serving or having served in such capacity.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a director, officer or other person entitled to indemnification hereunder.

The foregoing right of indemnification shall be in addition to and not exclusive of any other rights which such director or officer or other person may be entitled under the Articles of Organization, any agreement, or pursuant to any action taken by the directors or shareholders of the Corporation or otherwise.

## **ARTICLE VI**

### **SHARE CERTIFICATES AND TRANSFER**

**Section 6.1. CERTIFICATES REPRESENTING SHARES.** Certificates representing shares of the Corporation shall state:

- (a) the name of the Corporation and that it is organized under the laws of the Commonwealth;
- (b) the name of the person to whom issued;
- (c) the number and class of shares and the designation of the series, if any, which the certificate represents; and
- (d) a conspicuous statement setting forth restrictions on the transfer of the shares, if any.

No share shall be issued until the consideration therefor, fixed as provided by law, has been fully paid.

The Corporation shall, after the issuance or transfer of uncertificated shares, send to the registered owner of uncertificated shares a written notice containing the information required to be set forth or stated on certificates pursuant to the Massachusetts Business Corporations Act. Except as otherwise expressly provided by law, the rights and obligations of the holders of uncertificated shares and the rights and obligations of the holders of certificates representing shares of the same class and series shall be identical.

**Section 6.2. TRANSFERS OF SHARES.** Shares of the Corporation shall be transferable in the manner prescribed by law and in these Bylaws. Transfers of shares shall be made on the books of the Corporation only by the holder of record thereof, by such person's attorney lawfully made in writing and, in the case of certificated shares, upon the surrender of the certificate thereof, which shall be cancelled before a new certificate or uncertificated shares shall be issued. No transfer of shares shall be valid as against the Corporation for any purpose until it shall have been entered in the share records of the Corporation by an entry showing from and to whom the shares were transferred.

**Section 6.3. REGISTERED SHAREHOLDERS.** The Corporation may treat the registered owner of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting

those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth, or giving proxies with respect to those shares.

Neither the Corporation nor any of its officers, directors, employees, or agents shall be liable for treating that person as the owner of those shares at that time for those purposes, regardless of whether that person possesses a certificate for those shares and shall not be bound to recognize any equitable or other claim to or interest in such share or shares on the part of any other person, whether or not it shall have express notice thereof, except as otherwise provided by law.

**Section 6.4. LOST OR REPLACEMENT CERTIFICATES.** The Corporation may issue a new certificate for its shares in place of any certificate theretofore issued and alleged by its owner of record or such owner's authorized representative to have been lost, stolen, or destroyed if the Corporation, transfer agent, or registrar is not on notice that such certificate has been acquired by a bona fide purchaser. A replacement certificate may be issued if the owner or the owner's representative:

(a) files with the Secretary of the Corporation and the transfer agent or the registrar, if any, a request for the issuance of a new certificate, together with an affidavit in form satisfactory to the Secretary and transfer agent or registrar, if any, setting forth the time, place, and circumstances of the loss; and

(b) complies with such other reasonable requirements as the chair of the Board of Directors, the President, the Secretary, or the Board of Directors and the transfer agent or the registrar, if any, shall deem appropriate under the circumstances, which may include filing a sufficient indemnity bond to indemnify and save harmless the Corporation and the transfer agent or the registrar, if any, from any and all damage, liability, and expense of every nature whatsoever resulting from the Corporation, the transfer agent, or the registrar issuing a new certificate in place of the one alleged to have been lost, stolen, or destroyed.

A new certificate may be issued in lieu of any certificate previously issued that has become defaced or mutilated upon surrender for cancellation of a part of the old certificate sufficient, in the opinion of the Secretary and the transfer agent or the registrar, if any, to identify the owner of the defaced or mutilated certificate, the number of shares represented thereby, and the number of the certificate and its authenticity and to protect the Corporation and the transfer agent or the registrar against loss or liability. When sufficient identification for such defaced or mutilated certificate is lacking, a new certificate may be issued upon compliance with all of the conditions set forth in this Section in connection with the replacement of lost, stolen, or destroyed certificates.

## **ARTICLE VII DISTRIBUTIONS**

**Section 7.1. DECLARATION.** The Board of Directors may authorize, and the Corporation may make, distributions to its shareholders in cash, property, or shares of the Corporation to the extent permitted by the Articles of Organization and the Massachusetts Business Corporation Act.

**Section 7.2. RECORD DATE FOR DIVIDENDS AND DISTRIBUTIONS.** For the purpose of determining shareholders entitled to receive a distribution by the Corporation (other than a distribution involving a purchase or redemption by the Corporation of any of its own shares) or a share dividend, the Board of Directors of the Corporation may, at the time of declaring the dividend or distribution, set a record date no more than seventy (70) days prior to the date of the dividend or distribution. If no record date is fixed for the determination of shareholders entitled to receive a distribution (other than a distribution involving a purchase or redemption by the Corporation of any of its own shares) or a share dividend, the record date shall be the date on which the resolution of the Board of Directors declaring the distribution or share dividend is adopted.

## **ARTICLE VIII GENERAL PROVISIONS**

**Section 8.1. SEAL.** The Corporation may adopt a corporate seal in a form approved by the Board of Directors. The Corporation shall not be required to use the corporate seal and the lack of the corporate seal shall not affect an otherwise valid contract or other instrument executed by the Corporation.

**Section 8.2. CHECKS, DRAFTS, ETC.** All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

**Section 8.3. FISCAL YEAR.** The fiscal year of the Corporation shall be as determined by the Board of Directors.

**Section 8.4. CONFLICT WITH APPLICABLE LAW OR ARTICLES OF ORGANIZATION.** These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

**Section 8.4. INVALID PROVISIONS.** If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

**Section 8.5. EMERGENCY MANAGEMENT OF THE CORPORATION.** In the event of an emergency, to the extent not limited or prohibited by law, the Articles of Organization or these Bylaws, the following provisions regarding the management of the Corporation shall take effect immediately. An emergency exists if a majority of the Corporation's governing persons cannot readily participate in a meeting because of the occurrence of a catastrophic event.

In the event of an emergency, a meeting of the Board of Directors may be called following the attempt of not less than two-hour notice to each director. Said notice may be given by electronic transmission, including facsimile transmission, transmission to an electronic mail address provided by the director, as well as by telephone.

The Board of Directors is to approve and maintain a current list of officers or other persons to serve as directors to the extent necessary to provide a quorum at any meeting held while these emergency bylaws are in effect.

These emergency provisions take effect only in the event of an emergency as defined hereinabove, and will no longer be effective after the emergency ends. Any and all provisions of these Bylaws that are consistent with these emergency provisions remain in effect during an emergency. Any or all of these actions of the Corporation taken in good faith in accordance with these provisions are binding upon this Corporation and may not be used to impose liability on a managerial official, employee, or agent of the Corporation.

## **ARTICLE IX AMENDMENT OF BYLAWS**

**Section 9.1. SHAREHOLDERS.** These Bylaws may be amended, repealed, or otherwise altered by the shareholders.

**Section 9.2. BOARD OF DIRECTORS.** The Board of Directors may also make, amend, or repeal, subject to any provision of the Massachusetts Business Corporation Act, the Articles of Organization, or a bylaw adopted by the shareholders that reserves the power exclusively to the shareholders or otherwise restricts the authority of the Board of Directors.



*The Commonwealth of Massachusetts*  
*Secretary of the Commonwealth*  
*State House, Boston, Massachusetts 02133*

William Francis Galvin  
Secretary of the  
Commonwealth

April 14, 2022

TO WHOM IT MAY CONCERN:

I hereby certify that according to the records of this office,

**SILVER THERAPEUTICS OF PALMER, INC.**

is a domestic corporation organized on **March 12, 2021**, under the General Laws of the Commonwealth of Massachusetts.

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,  
I have hereunto affixed the  
Great Seal of the Commonwealth  
on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth

Processed By: TAA



Commonwealth of Massachusetts  
Department of Revenue  
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L1408768448  
Notice Date: April 21, 2022  
Case ID: 0-001-490-522



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



SILVER THERAPEUTICS OF PALMER, IN  
89 COURT ST  
SARATOGA SPRINGS NY 12866-3325

### ***Why did I receive this notice?***

The Commissioner of Revenue certifies that, as of the date of this certificate, SILVER THERAPEUTICS OF PALMER, INC. is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

**This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.**

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

### ***Visit us online!***

Visit [mass.gov/dor](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief  
Collections Bureau

### **Certification of No Employees**

In accordance with Section 935 CMR 500.101(1)(c)(4) of the Massachusetts Code of Regulations, and in support of the application of Silver Therapeutics, Inc. (the “**Applicant**”), the undersigned, Josh Silver, hereby confirms and certifies to the Cannabis Control Commission (the “CCC”) that:

1. At the present time, the Applicant has no employees in connection with its proposed Marijuana Establishment (the “**Marijuana Establishment**”);

Under penalties of perjury, I declare that I have examined this certification and to the best of my knowledge believe it is true, correct and complete, and I further declare that I have authority to sign this document.

Dated as of April 13, 2022



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Name: Josh Silver

## Silver Therapeutics of Palmer, Inc.

### **Plan for Obtaining Liability Insurance**

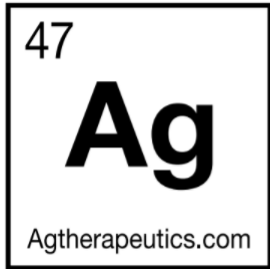
Silver Therapeutics of Palmer, Inc. (the “**Company**”) will work with an insurance broker licensed in the Commonwealth of Massachusetts to obtain insurance that meets or exceeds the requirements set forth in 935 CMR 500.105 (10).

Pursuant to 935 CMR 500.105(10) the Company shall obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, or such amount as otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Pursuant to 935 CMR 500.105(10)(b) if the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will place in escrow (the “**Liability Insurance Escrow Account**”) a sum of no less than Two Hundred and Fifty Thousand and 00/100 (\$250,000.00) or such other amount approved by the Commission, to be expended for coverage of liabilities. If the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will properly document such inability through written records that will be retained in accordance with the Company’s *Record Retention Policy* (incorporated herein by reference). If the Liability Insurance Escrow Account is used to cover such liabilities, it will be replenished within ten (10) business days of such expenditure.

The Company will submit reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000: *Adult Use of Marijuana*.

This policy may also be referred to by the Company as the “**Liability Insurance Policy**”.



# **Silver Therapeutics**

**Silver Therapeutics of Palmer, Inc.  
Adult Use Marijuana Dispensary  
1235 Thorndike St  
Palmer, MA**

# Outline

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- 1) Executive Summary
- 2) Market Analysis
- 3) Organization & Management
- 4) Products
- 5) Marketing
- 6) Growth
- 7) Financial Projections

## Executive Summary

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This Business Plan relates to Silver Therapeutics of Palmer, Inc. (“**ST**”) plan to open an Adult Use Marijuana Retailer business pursuant to the State of Massachusetts’ Adult-Use of Marijuana laws. ST’s proposed storefront retail location is at 1235 Thorndike St., Palmer, (the “**1235 Thorndike Street**” or the “**Property**”). ST has leased 1235 Thorndike Street for up to five terms of 10 years each pursuant to a renewable lease agreement.

1235 Thorndike Street matches the ideal picture of a community dispensary store. It has ample parking and is located strategically along the Massachusetts Turnpike. ST is affiliated with Silver Therapeutics, Inc., a marijuana business with the same shareholders as ST and which has two additional marijuana retail dispensaries.

ST will operate from 8am to 8pm seven days a week as a Marijuana Retailer. Our work force will be trained to operate within the framework of our company’s corporate culture and also to meet the needs of all our customers.

ST has a CRM software that will enable us to manage one on one relationships with our customers no matter how large the number of our customer base grows. In regards to the products we offer, we will ensure that we educate our customers and suggest the best product/s for their interests. We will additionally ask for customer input in future business decisions.

Silver Therapeutics is owned and managed by Joshua Silver (CEO), Joshua Ferranto (COO), and Brendan McKee (CFO).

### **Our Products**

ST will retail a wide range of marijuana infused products, i.e. edibles, distillates, concentrates, oils, and topical creams. Because of our existing presence in Massachusetts we have in place relationships with licensed wholesalers to purchase a wide range of marijuana products to be sold in the first few months of operation. We will only enter into agreements for the wholesale purchase of marijuana from licensed cultivators.

### **Our Vision Statement**

Our vision is to provide the highest quality marijuana products for our customers and serve the communities where we operate.

### **Our Mission Statement**

Our mission is to establish a premier Marijuana Retailer that that will sell only the highest quality marijuana and marijuana infused products made available a at affordable prices to the residents of Palmer and surrounding areas.

### **Business Structure**

ST is a business that will be built on a solid foundation of high quality product and ethics. From the outset, we have decided to recruit only qualified people to take on the various job positions in our organization. We will, of course, operate within the rules and regulations set forth by the Cannabis Control Commission (the “**CCC**”). We are recruiting experienced and qualified employees to be the foundational staff of the organization. We hope to leverage their expertise to build our business and brand as the premiere marijuana dispensary in the area.

When hiring, we will look for applicants that are not just qualified and experienced, but honest, customer centric and willing to learn. Our team will help us build a prosperous business that will benefit all stake holders (the owners, workforce, and customers). We are considering a profit-sharing arrangement that will be made available to all of our management team. It will be performance based for a period of three years or more.

## **Market Analysis**

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### **Market Trends**

Cannabis industry analysts see major potential for the Massachusetts marijuana market. Legal pot sales are projected to reach over \$2 billion statewide by the end of 2022. Despite the additional states, such as New York, Maine and Vermont legalizing recreational marijuana sales, we expect that the demand will continue to grow within the State.

### **Our Target Market**

It should come as no surprise that the majority of respondents are between the ages of 21-35. What is significant is that a combined 32.52% of adults 45 years or older consume Cannabis. This signifies that Cannabis consumers are professional adults and not those types that are stereotypically portrayed as misguided and unmotivated young adults. When adding in the 36-45 year old group, a total of 58.27% of cannabis consumers are in the age group of professional adults. Another important statistic to consider is that baby boomers, those born between 1946 and 1964, are reaching retirement and by 2030, all of them will be over the age of 65. According to analysts, combined, people between the ages of 46 – 65 make up 28.76% of Cannabis consumers. This demographic is already looking to alternative therapies to manage symptoms of the various age-related ailments and diseases, including. In fact, baby boomers are the fastest growing Cannabis consumers pursuant to a NYU study reporting a 71% increase in usage by those over the age of 50 during 2006 – 2013.

## **Our Competitive Advantage**

In every business there is competition, however, we believe we possess several strengths that will allow us to be successful in the Town of Palmer.

In this industry, the competitive dynamics center around the quality of cannabis dispensed, the service offered, the location, discounts offered for the products, and the branding, as this plays a significant role in positive perception.

It is through our customer service that we can secure a fair share of the available market. We will ensure that all customers are educated, and that each order is properly dispensed under the State's guidelines with informational printouts.

Silver Therapeutics is entering into the market prepared to favorably compete in the industry. Our store is well positioned and visible. We have plenty of parking available with qualified security. Our management staff is well groomed in retail/hospitality and all our employees will be trained to provide customized customer service to all of our clients.

We are going to be one of the first few marijuana dispensaries in the area which will allow us to capture greater market share early on.

## **Palmer Organization & Management**

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All staff and management positions will be filled by qualified applicants who have been approved by the CCC as qualified agents of ST. The following positions will be available at Silver Therapeutics;

- Store Manager (supervising all operations)
- Security Manager (supervising all security related matters)
- Reception/Check-in Agent
- Registered Sales Agents
- Data & Marketing Manager

- Information Technologist

## **Roles and Responsibilities**

The responsibilities of each position within the dispensary will be broken down as detailed below.

### **Store Manager:**

- Ensures that the store facility is in tip top shape and conducive enough to welcome customers (This includes turning on equipment such as computers, scales, printers and fax machines)
- Ensures that goods and products are properly arranged
- Responsible for processing orders
- Responsible for sterilizing the counter tops, scales, and other devices
- Handles administrative and bookkeeping tasks, inventory control, stocking shelves, and data entry
- Performs monthly inventory counts, file paperwork, and stock inventory
- Responsible for managing the daily activities in the company (dispensary store)
- Providing guidance on the different products, in response to customer enquiries
- Responsible for recruiting, training and managing staff
- Responsible for processing orders and dispensing product
- Responsible for ordering, selling and controlling product and other stock
- Responsible for meeting with customers as needed
- Responsible for managing the organizations' budgets
- Responsible for keeping statistical and financial records
- Responsible for preparing publicity materials and displays
- Handles marketing services
- Interfaces with third – party providers (vendors)
- Controls the sales floor inventory

- Supervises the entire sales staff and workforce
- Handles any other duty as assigned by the CEO

### **Security Manager:**

- Responsible for managing all security matters.
- Responsible for compliance with State security protocols.
- Responsible for continued education on security training and best practices of ST staff and management.

### **Reception/Check-in Agent:**

- Responsible for ensuring only customers 21 years of age or older are checked-in and allowed into the building.

### **Registered Sales Agents:**

- Greets with our customers with a smile and compassion
- Listen to the needs of each customer to best educate and recommend products
- Receives payments on behalf of the organization
- Issues receipt to customers
- Ensures that the store facility is in tip top shape and conducive enough to welcome customers (This includes turning on equipment such as computers, scales, printers and fax machines)
- Ensures that goods and products are properly arranged
- Responsible for processing orders
- Responsible for sterilizing the counter tops, scales, and other devices
- Handles administrative and bookkeeping tasks, inventory control, stocking shelves, and data entry
- Performs monthly inventory counts, file paperwork, and stock inventory
- Handles any other duty as assigned by the floor manager

### **Data & Marketing Manager:**

- Manages external research and coordinates all the internal sources of information to retain the organizations' best customers and attract new ones
- Models demographic information and analyzes the volumes of transactional data generated by customer purchases
- Sources for clients for the company
- Responsible for promoting the company's image
- Responsible for creating marketing and sales strategies, etc.
- Represents the organization in some strategic business meetings
- Handles any other duty as assigned by ownership/the store manager

### **Information Technologist:**

- Manages the organization website
- Handles ecommerce aspect of the business
- Responsible for installing and maintenance of computer software and hardware for the organization
- Manages logistics and supply chain software, Web servers, e-commerce software and POS (point of sale) systems
- Manages the organization's CCTV
- Handles any other technological and IT related duties

## **Products**

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Our core product as an adult use marijuana dispensary will be marijuana flower which will come in a variety of different strains. Aside from providing marijuana flower, ST will retail a wide range of marijuana infused edibles, distillates, concentrates, oils, and topical creams.

# Marketing

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The marketing and sales strategy of ST will be based on generating long-term personalized relationships with customers. We will ensure that we offer the highest quality product at fair pricing.

All our employees will be well trained and equipped to provide excellent and knowledgeable customer service. We know that if we are consistent with offering high quality marijuana product and excellent customer service, we will consistently increase our customer base.

Before choosing a location for our marijuana dispensary store, we conducted a thorough market survey and feasibility studies confirming the ability for us to penetrate the available market and become the preferred market choice.

We have hired experts who have a solid understanding of the retail industry to help us develop marketing strategies that will allow us to achieve our business goal of winning a larger percentage of the available market in Palmer. Hiring these groups in marketing and data management is a wise investment that will guarantee a large return within a short period of time.

In summary, ST will adopt the following informational and marketing approach to communicate with the community we will serve;

- Introduce our business by offering informational sessions to residents, business owners and organizations
- Responsibly advertise our business where permitted
- Engage in email segmentation and marketing with our customers
- Encourage and leverage word of mouth marketing (referrals)

## Publicity and Advertising Strategy

Although 1235 Thorndike Street has a highly visible storefront, we will constantly attempt to intensify public's awareness for our business within

the guidelines for advertising set forth by the State regulatory agencies. We are going to explore all available conventional and non – conventional means to promote our retail business.

Below are the platforms we intend to leverage in order to promote and advertise ST;

- Place adverts on both print (community based newspapers and magazines) and electronic media platforms
- Sponsor relevant community programs
- Leverage social media platforms like; Instagram, Facebook , twitter, YouTube, Google +

## **Our Pricing Strategy**

It would be short-sighted to fix pricing without first determining other factors that surround costing. This is one of the reasons why we will work towards ensuring that all our products are offered at highly competitive prices compared to what is obtainable in the market area.

Although we may offer our products at lower prices than our competitors does not in any way mean that we will sell sub – standard products. Selling our products at a lower price than what is obtainable in our competitors' stores means that we will only reduce our profit margin and gain sales margin.

## **Growth**

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It is the wish of any business to become so successful that there is a good succession plan to act upon. More often than not, having a good succession plan will help you know the direction your business is headed. As such, the future of a business lies in the number of loyal customers, the capacity and competence of the employees, their investment strategy, and the business structure.

One of our major goals in starting ST is to build a business that will survive off its own cash flow without the need for injecting finances from external sources once the business is officially up and running. We know that one of the ways of gaining approval and winning customers over is to sell our product cheaper than what is currently obtainable in the market. We are well prepared to survive on lower than normal profit margins.

ST will implement the correct foundation, structures, and processes to ensure that our staff is well taken of. Our company's corporate culture is designed to drive our business to greater heights and training and re – training of our workforce is a top priority. A profit-sharing arrangement will be made available to all our management staff and it will be based on their performance for a period of three years or more. We know that with this policy, we will be able to successfully hire and retain the best team we can get in the industry; they will be more committed to help us build a sustainable business.

## **Financial Projections**

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### **Sources of Income**

Our source of income will be in the retailing of marijuana and marijuana infused products.

### **Sales Forecast**

One of the true marks of an effective entrepreneur is being able to forecast sales based on the magnitude of work that has been put into the business. It is important to state that our sales forecast is based on the data gathered during our feasibility studies, market survey, and also some of the assumptions readily available in the field.

Below are the sales projections for the first three years of operations, which forecasts dispensing at 1235 Thorndike Street over a three-year period. Also below is a five-year financial snapshot taken from the Marijuana Policy Group whom we sourced for market analysis;

### **First Year – 2021 (Opening Q4:**

Recreational: \$1,088,986

### **Second Year - 2022:**

\$6,276,274

### **Third Year - 2023:**

Recreational: \$6,433,002

### **Start – Up Expenditure (Budget)**

From research, it can be deduced that starting a marijuana dispensary business isn't something that comes cheap, neither is it for those that are faint of heart.

The items listed below are the basics that we would need when starting our own marijuana dispensary business in the United States, although costs might vary slightly;

- The Total Fee for Registering the Business in Massachusetts – \$50,000
- Legal expenses for obtaining licenses and permits – \$10,000
- Marketing promotion expenses for the grand opening of 238 Main St. in the amount of \$5,000
- Cost for hiring Consultant – \$5,000
- Cost for Computer Software (Accounting Software, Payroll Software, CRM Software, Microsoft Office, QuickBooks Pro, drug interaction software) – \$2,000 per month (\$24,000 annually)
- Insurance (general liability, workers' compensation and property casualty) coverage at a total premium – \$2,000 per month (\$24,000 annually)
- Cost for payment of rent for 12 month at \$2,000 per month in the total amount of \$24,000 annually
- Cost for Shop remodeling (construction of racks and shelves) – \$80,000
- Other start-up expenses including stationery \$1,000 and phone and utility deposits \$1,000

- Operational cost for the first 3 months (salaries of employees, payments of bills et al) – \$100,000
- The cost for Start-up inventory (stocking with a wide range of products) – \$150,000
- Storage hardware (bins, rack, shelves,) – \$2,500
- Cost for Supplies (Assorted bottles, boxes, envelopes, etc. for dispensing)- \$15,000
- Cost for store equipment (cash register, security, ventilation, signage) – \$25,000
- Cost of purchase and installation of CCTVs: \$10,000
- The cost for the purchase of furniture and gadgets (Computers, Printers, Telephone, TVs, tables and chairs et al): \$10,000
- The cost of Launching a Website: \$10,000
- The cost for our opening party: \$2,500
- Miscellaneous: \$50,000

We would need an estimate of \$545,000 to successfully set up our Adult-Use marijuana dispensary store in Palmer, MA. Please note that this amount includes the salaries of all staff for the first three months of operation.

### **Generating Funding / Startup Capital for Silver Therapeutics**

ST is affiliated with Silver Therapeutics, Inc., an existing licensed marijuana retailer in Massachusetts with over \$10,000,000 in annual revenue. All ST's start-up expenses will be funded by Silver Therapeutics, Inc.

## **Silver Therapeutics of Palmer, Inc.**

### **Restricting Access to Age 21 and Older**

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall require that all Marijuana Establishment Agents, Visitors and Consumers of marijuana for adult use (each as defined in 935 CMR 500.002) are 21 years of age or older. The Company will positively identify individuals seeking access to the premises of the Marijuana Establishment, or to whom marijuana or marijuana products are being transported pursuant to 935 CMR 500.105(14) (if applicable) to limit access solely to individuals 21 years of age or older.

Pursuant to 935 CMR 500.140, the Company shall immediately inspect an individual’s proof of identification and determine that the individual is 21 years of age or older upon entry to the Marijuana Establishment. The Company shall also inspect an individual’s proof of identification at the point of sale and determine that the individual is 21 years of age or older.

The identification shall contain a name, photograph, and date of birth, and shall be limited to one of the following:

1. A driver’s license;
2. A government issued-identification card;
3. A military identification card; or
4. A passport.

This policy may also be referred to by the Company as the “**Policy to Restrict Access to Persons Age 21 and Older**”.

## Silver Therapeutics of Palmer, Inc.

### Quality Control and Testing for Contaminants

#### Testing of Marijuana

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall not sell or otherwise market for adult use any marijuana product, including marijuana, that has not first been tested by an Independent Testing Laboratory, except as allowed under 935 CMR 500.000: *Adult Use of Marijuana*.

The Company is not proposing to cultivate or produce its own products at this time. The Company intends to obtain all of its products from other duly licensed Marijuana Establishments.

The Company shall ensure that all marijuana and marijuana products sold at its Marijuana Establishment have been tested by an Independent Testing Laboratory that tests the marijuana products in compliance with the protocol(s) established in accordance with M.G.L. 94G § 15 and in a form and manner determined by the Commission including, but not limited to, *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Co-located Marijuana Operations*. Testing of the Company’s environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission, as applicable.

The Company shall ensure that all marijuana and marijuana products have been tested for the cannabinoid profile and for contaminants as specified and required by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Co-located Marijuana Operations*.

The Company shall notify the Commission within seventy-two (72) hours of receipt in writing, of any laboratory testing results indicating that the marijuana or marijuana products contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) that contamination cannot be remediated, and must be disposed of. The notification from the Company shall describe a proposed plan of action for both the destruction of the contaminated production batch within seventy-two (72) hours, and the assessment of the source of contamination and shall contain any information regarding contamination as specified by the Commission, or immediately upon request by the Commission. The Company shall ensure that notification comes from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly.

The Company shall maintain the results of all testing for no less than one year. Any marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

## Silver Therapeutics of Palmer, Inc.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with the Company's *Transportation Policy* and 935 CMR 500.105(13).

All excess marijuana shall be disposed of in compliance with the Company's *Waste Disposal Policy* and 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.

Single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) shall be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

If the Company receives notice that the marijuana or marijuana products it has submitted for testing has failed any test for contaminants, it shall either: (1) re-analyze without remediation; (2) take steps remediate the identified contaminants; or (3) dispose of the marijuana or marijuana product and in any event, all actions shall comply with 935 CMR 500.160(13).

### Handling of Marijuana

The Company shall handle and process marijuana and marijuana products in a safe and sanitary manner. The Company shall implement the following policies (as applicable to its Marijuana Retail License):

- (a) To the extent applicable the Company shall process the leaves and flowers of the female marijuana plant only, which shall be:
  1. Well cured and generally free of seeds and stems;
  2. Free of dirt, sand, debris, and other foreign matter;
  3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and if applicable, 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*;
  4. Prepared and handled on food-grade stainless steel tables with no contact with the Company's marijuana establishment agents' bare hands; and
  5. Packaged in a secure area.
- (b) The Company shall comply with the following sanitary requirements:
  1. Any marijuana establishment agent whose job includes contact with marijuana or non-edible marijuana products, including cultivation, production, or packaging shall

## **Silver Therapeutics of Palmer, Inc.**

comply with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;

2. Any marijuana establishment agent working in direct contact with preparation of marijuana or non-edible marijuana products shall conform to sanitary practices while on duty, including:
  - i. Maintaining adequate personal cleanliness; and
  - ii. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. The Company shall supply adequate and convenient hand-washing facilities furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. The Company shall supply sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. The Company shall ensure that there will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items shall not be stored in an area

## Silver Therapeutics of Palmer, Inc.

containing products used in the cultivation of marijuana. The Commission may require a Marijuana Establishment to demonstrate the intended and actual use of any toxic items found on the premises;

11. The Company's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
  12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines;
  13. The Company shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
  14. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
  15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
  16. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety shall be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
- (c) The Company shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*.

This policy may also be referred to by the Company as the “**Quality Control and Testing Policy**”.

## Silver Therapeutics of Palmer, Inc.

### Personnel Policies Including Background Checks

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall implement the following Personnel Policies and Background Check policies:

- (1) The Company shall require that all personnel strictly adhere to, and comply with, all aspects of the *Security Policy*, which policy shall be incorporated herein by reference, specifically employee security policies, including personal safety and crime prevention techniques;
- (2) The Company shall develop a staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- (3) The Company shall develop emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (4) It shall be a policy of the Company that the workplace shall be alcohol, smoke and drug-free;
- (5) The Company shall require that all personnel strictly adhere to, and comply with, all aspects of the *Record Retention* and *Financial Record Maintenance and Retention* policies, which policies shall be incorporated herein by reference, specifically regarding the maintenance of confidential information and other records required to be maintained confidentially;
- (6) The Company shall immediately dismiss any Marijuana Establishment agent who has:
  - a. Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
  - b. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - c. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of Other Jurisdictions (as that term is defined in 935 CMR 500.002).
- (7) The Company shall make a list of all board members and Executives (as that term is defined in 935 CMR 500.002) of the Marijuana Establishment, and members of the licensee (if any), available upon request by any individual. The Company may make this list available on its website.
- (8) The Company shall develop policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s), as set forth in its *Security Policy*.

## **Silver Therapeutics of Palmer, Inc.**

- (9) The Company shall apply for registration for all of its board members, directors, employees, Executives (as that term is defined in 935 CMR 500.002), managers, and volunteers. All such individuals shall:
- a. be 21 years of age or older;
  - b. not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions (as that term is defined in 935 CMR 500.002); and
  - c. be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.
- (10) An application for registration of a marijuana establishment agent shall include:
- a. the full name, date of birth, and address of the individual;
  - b. all aliases used previously or currently in use by the individual, including maiden name, if any;
  - c. a copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
  - d. an attestation that the individual will not engage in the diversion of marijuana products;
  - e. written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
  - f. background information, including, as applicable:
    1. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002), whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
    2. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002) relating to any professional or occupational or fraudulent practices;

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3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
  4. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002) with regard to any professional license or registration held by the applicant;
- (b) a nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
- (c) any other information required by the Commission.
- (11) An Executives (as that term is defined in 935 CMR 500.002) of the Company registered with the Department of Criminal Justice Information Systems (“DCJIS”) pursuant to 803 CMR 2.04: *iCORI Registration*, shall submit to the Commission a Criminal Offender Record Information (“CORI”) report and any other background check information required by the Commission for each individual for whom the Company seeks a marijuana establishment agent registration, obtained within 30 calendar days prior to submission.
- a. The CORI report obtained by the Company shall provide information authorized under Required Access Level 2 pursuant to 803 CMR 2.05(3)(a)2.
  - b. The Company’s collection, storage, dissemination and usage of any CORI report or background check information obtained for marijuana establishment agent registrations shall comply with 803 CMR 2.00: *Criminal Offender Record Information (CORI)*.
- (12) The Company shall notify the Commission no more than one (1) business day after a marijuana establishment agent ceases to be associated with the Company. The subject agent’s registration shall be immediately void when the agent is no longer associated with the Company.
- (13) The Company shall require that all agents renew their registration cards annually from the date of issue, subject to a determination by the Commission that the agent continues to be suitable for registration.
- (14) After obtaining a registration card for a marijuana establishment agent, the Company shall notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five (5) business days of any changes to the information that the Marijuana Establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

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- (15) The Company's agents shall carry their registration card at all times while in possession of marijuana products, including at all times while at the Marijuana Establishment or while transporting marijuana products.
- (16) Should any of the Company's agents be affiliated with multiple Marijuana Establishments the Company shall ensure that such agents are registered as a marijuana establishment agent by each Marijuana Establishment and shall be issued a registration card for each establishment.
- (17) The Company shall maintain, and keep up to date, an employee handbook that employees will be given copies of at the start of their employment and will be required to attest that they have read and received the same, covering a wide range of topics, including but not limited to: (1) Employee benefits; (2) Vacation and sick time; (3) Work schedules; (4) Confidentiality standards; (5) Criminal background check standards (6) Security and limited access areas; (7) Employee identification and facility access; (8) Personal safety and crime prevention techniques; (9) Alcohol, drug, and smoke-free workplace; and (10) Grounds for discipline and termination. Each Employee shall be required to review the handbook and attest to their understanding and receipt of the same. The Company will review its employee handbook periodically and communicate any changes to its employees.

### **Personnel Record Keeping**

The Company shall maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
  - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - b. Documentation of verification of references;
  - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
  - d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
  - e. Documentation of periodic performance evaluations;

## Silver Therapeutics of Palmer, Inc.

- f. A record of any disciplinary action taken; and
  - g. Notice of completed responsible vendor and eight (8) hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions (as applicable);
  4. Personnel policies and procedures; and
  5. All background check reports obtained in accordance with M.G.L. c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: *Criminal Offender Record Information (CORI)*.

The Company's aforementioned Personnel Records shall be available for inspection by the Commission, on request. All records shall be maintained in accordance with generally accepted accounting principles.

Following closure of the Company's Marijuana Establishment, all records shall be kept for at least two (2) years at the Company's expense, in a form and location acceptable to the Commission.

### **Staffing Plan**

#### Executive Level:

- CEO;
- CFO; and
- COO.

#### Management Level:

- Sales Manager; and
- Security Manager.

#### Staff Level

- Up to fifteen (15) Staff Level Sales Representatives;

#### Consultant Level

- Attorney / Compliance Officer;
- Human Resources Provider; and
- Security consultants.

This policy may also be referred to by the Company as the “**Personnel and Background Check Policy**”.

## Silver Therapeutics of Palmer, Inc.

### Record Keeping Procedures

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all records required in any section of 935 CMR 500.000: *Adult Use of Marijuana*, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale SOR electronic tracking system records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) Personnel records as described in the Company’s *Personnel and Background Check Policy*, which policy shall be incorporated herein by reference, and as follows:
  - a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
  - b. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
    - i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - ii. Documentation of verification of references;
    - iii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - iv. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    - v. Documentation of periodic performance evaluations;
    - vi. A record of any disciplinary action taken; and
    - vii. Notice of completed responsible vendor training program and in-house training.

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- c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions (as applicable);
  - d. Personnel policies and procedures, including at a minimum, the following: (a) code of ethics; (b) whistleblower policy; and (c) a policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations; and
  - e. All background check reports obtained in accordance with M.G.L. c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: *Criminal Offender Record Information (CORI)*;
- (e) Business records as described in the Company's *Financial Record Maintenance and Retention Policy*, which shall include manual or computerized records of the following: (1) assets and liabilities; (2) monetary transactions; (3) books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; (4) sales records including the quantity, form, and cost of marijuana products; and (5) salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment, if any; and
- (f) Waste disposal records as required under 935 CMR 500.105(12), including but not limited to, a written or electronic record of the date, the type and quantity of marijuana, marijuana products or waste disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two (2) Marijuana Establishment Agents present during the disposal or other handling, with their signatures. The Company shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any disciplinary action and may be extended by an order of the Commission.

All Confidential Information (as that term is defined in 935 CMR 500.002) shall be maintained confidentially including secured or protected storage (whether electronically or in hard copy), and accessible only to the minimum number of specifically authorized employees essential for efficient operation and retention of such records. In any event, the Company shall be authorized to disclose such confidential information as may be required by law.

Following closure of a Marijuana Establishment, the Company shall keep all records for at least two (2) years at the Company's expense and in a form and location acceptable to the Commission. It shall be a policy of the company that any and all records subject to any disciplinary action shall be retained for the duration of such action, or as otherwise extended by order of the Commission.

This policy may also be referred to by the Company as the “**Record Retention Policy**”.

## Silver Therapeutics of Palmer, Inc.

### Maintaining of Financial Records

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all financial records required in any section of 935 CMR 500.000: *Adult Use of Marijuana*, and business records, in accordance with 935 CMR 500.105(e), which shall include manual or computerized records of:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment, if any.

Furthermore, consistent with the Company’s *Dispensing Policy*, the Company shall implement the following policies for Recording Sales

- (a) The Company shall utilize a point-of-sale (“**POS**”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“**DOR**”).
- (b) The Company may also utilize a sales recording module approved by the DOR.
- (c) The Company shall not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
- (d) The Company shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Company shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If the Company determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
  - i. it shall immediately disclose the information to the Commission;
  - ii. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

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- iii. take such other action directed by the Commission to comply with 935 CMR 500.105.
- (e) The Company shall comply with 830 CMR 62C.25.1: *Record Retention and DOR Directive 16-1* regarding recordkeeping requirements.
- (f) The Company shall adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
- (g) The Company shall allow the Commission and the DOR audit and examine the POS system used by a retailer in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000: *Adult Use of Marijuana*;

Following closure of a Marijuana Establishment, the Company shall keep all records for at least two years at the Company's expense and in a form and location acceptable to the Commission.

This policy may also be referred to by the Company as the “**Financial Record Maintenance and Retention Policy**”.

## **Silver Therapeutics of Palmer, Inc.**

### **Employee Qualifications and Training**

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall ensure that all marijuana establishment agents complete minimum training requirements prior to performing job functions.

Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission.

Company Training Policies shall be as follows:

1. At a minimum, Company employees shall receive a total of eight (8) hours of training annually, which shall include a minimum of four (4) hours of Responsible Vendor Training (“**RVT**”) program courses established pursuant to 935 CMR 500.105(2)(b). Basic, on-the-job training, provided by the Company in the ordinary course of business, may be counted toward the eight (8) hour total training requirement.
2. Administrative employees that do not handle or sell marijuana are exempt from the four (4) hour RVT training requirement, but may take a RVT program as part of fulfilling the eight (8) hour training requirement.
3. Training shall be tailored to the roles and responsibilities of the job function of each employee.
4. RVT training may be conducted by the Company or by a third-party vendor
5. All agents that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor training program, which shall include the Basic Core Curriculum (as that term is defined in 935 CMR 500.000 *et. seq.*).
6. Once the Company is designated as a “responsible vendor” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete the Basic Core Curriculum training program within ninety (90) days of hire.
7. It shall be a policy of the Company that after initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.”
8. Administrative employees who do not handle or sell marijuana may take the responsible vendor training program on a voluntary basis.
9. The Company shall maintain records of compliance with all training requirements for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

## **Silver Therapeutics of Palmer, Inc.**

The Company shall ensure that the Basic Core Curriculum program offered to its employees includes the following:

- (a) Marijuana's effect on the human body, including:
  - a. Scientifically based evidence on the physical and mental health effects based on the type of marijuana product;
  - b. The amount of time to feel impairment;
  - c. Visible signs of impairment; and
  - d. Recognizing the signs of impairment.
- (b) Diversion prevention and prevention of sales to minors, including best practices;
- (c) Compliance with all tracking requirements; and
- (d) Acceptable forms of identification. Training shall include:
  - a. How to check identification;
  - b. Spotting and confiscating fraudulent identification;
  - c. Patient registration cards currently and validly issued by the Commission;
  - d. Common mistakes made in verification; and
  - e. Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G.
- (e) Other key state laws and rules affecting owners, managers, and employees, which shall include:
  - a. Conduct of marijuana establishment agents;
  - b. Permitting inspections by state and local licensing and enforcement authorities;
  - c. Local and state licensing and enforcement;
  - d. Incident and notification requirements;
  - e. Administrative, civil, and criminal liability;
  - f. Health and safety standards, including waste disposal

## Silver Therapeutics of Palmer, Inc.

- g. Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
- h. Permitted hours of sale;
- i. Licensee responsibilities for activities occurring within licensed premises;
- j. Maintenance of records, including confidentiality and privacy; and
- k. Any other areas of training determined by the Commission to be included in a responsible vendor training program.

The Company shall also ensure that all of its board members, directors, employees, Executives (as that term is defined in 935 CMR 500.002), managers, and volunteers shall:

- (a) be 21 years of age or older;
- (b) not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
- (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

This policy may also be referred to by the Company as the “**Employee Qualification and Training Policy**”.

## Silver Therapeutics of Palmer, Inc.

### Energy Compliance Plan

Silver Therapeutics of Palmer, Inc. (the “**Company**”) shall meet all applicable environmental laws, regulations, permits and other applicable approvals, including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7:00: *Air Pollution Control*. The Company will use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55 78(b) or applicable departments or divisions of the Executive Office of Energy and Environmental Affairs (the “EOEEA”) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, including but not limited to:

- Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
- Consideration of opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage); and
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

The Company shall provide energy and water usage reporting to the Commission in a form determined by the Commission, including but not limited to, guidance documents for Best Management Practices for Water Use approved by the Commission on April 4, 2019. The Company shall submit, in connection with its license renewal application, a report of its cultivation energy and water usage over the twelve (12) month period prior to renewing its licensure. If minimum standards or best management practices are not established by the time of an application for initial licensure, the Company will satisfy such standards or best management practices as a condition of license renewal, in addition to any terms and conditions of any environmental permit regulating the licensed activity.

Additionally, the Company shall, at a minimum, be subject to the following energy efficiency and equipment standards:

- (a) The building envelope for the Facility shall meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), International Energy Conservation Code (IECC) Section C402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*, except that because this facility will be built using an existing building, the Company may demonstrate

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compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as may be further defined by guidance issued by the Commission.

- (b) If the Company is unable to generate 80% of its total annual on-site energy use for all fuels (expressed on a MWh basis) from onsite or renewable generating sources, renewable thermal generation, as provided in M.G.L. c. 25A § 11F and 11F½, then it shall ensure that its Horticulture Lighting Power Density does not exceed 35 watts per square foot.
- (c) The Company shall provide third-party safety certification by an OSHA NRTL or SCC-recognized body, which shall certify that products meet a set of safety requirements and standards deemed applicable to horticultural lighting products by that safety organization as well as certification from a licensed Massachusetts Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in this 935 CMR 501.120(12)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility (as applicable).
- (d) If the Company is unable to generate 80% of its the total annual on-site energy use for all fuels (expressed on a MWh basis) from an onsite clean or renewable generating source, renewable thermal generation, as provided in M.G.L. c. 25A § 11F and 11F½, the Heating Ventilation and Air Condition (HVAC) and dehumidification systems shall meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: *State Building Code*).
- (e) Employees and visitors shall be required to wear eye protection near operating horticultural lighting equipment.
- (f) Prior to final licensure, the Company shall demonstrate compliance with 935 CMR 500.120(11) and 935 CMR 500.105(15) by submitting an energy compliance letter prepared by a licensed Massachusetts Professional Engineer, Registered Architect or a Certified Energy Auditor or Manager (as certified by the Association of Energy Engineers) with supporting documentation, together with submission of building plans pursuant to 935 CMR 500.103.

This policy may also be referred to by the Company as the “**Energy Compliance Policy**”.

## **Silver Therapeutics of Palmer, Inc.**

### **Diversity Plan**

Silver Therapeutics of Palmer, Inc. (the “**Company**”) understands and appreciates the importance of diversity and as such is committed to actively working to ensure a diverse work place is created in the Company.

#### **Statement of Purpose:**

In the operations of its marijuana Establishment, it is a policy of the Company to promote equity among:

- People of color (Black, African American, Hispanic, Latinx, and Indigenous People);
- Women,
- Veterans,
- Persons with disabilities, and
- L.G.B.T.Q.+ individuals

Therefore, the Company will make jobs available to people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and L.G.B.T.Q. +, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

To this end, the Company will deploy a plan for enhancing diversity and equity within the organization through a number of various outreach efforts. Specifically, as it relates to its own internal practices, the Company will implement the following policies in connection with its diversity plan:

#### **Goals:**

- The Company endeavors to provide job opportunities to people of color (particular Black, African American, Hispanic, Latinx, and Indigenous people), women, veterans, people with disabilities, and L.G.B.T.Q. + individuals. The Company shall seek parity in its work force based on the American Community Survey (ACS) 2010 U.S. Census. Workforce availability statistics for the Total Civilian Labor Force in Massachusetts is as follows: Women 49.2% and Minorities 25.2%<sup>1</sup>. Therefore, it is the Company’s goal to hire the following:
  - 48.8% Women.
  - 20.7% People of color (Black, African American, Hispanic, Latinx, and Indigenous people).
  - 20% L.G.B.T.Q.+ individuals.
  - 12% Individuals with disabilities.
  - 7% Veterans.

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<sup>1</sup> <https://www.mass.gov/files/2017-08/census-2010-workforce-availability.pdf>

## **Silver Therapeutics of Palmer, Inc.**

- It shall be a goal of the Company to offer 100% of the Company's opportunities for advancement to management and executive positions internally, thereby providing opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement. Therefore, and consistent with its overall workforce goal, the Company's goal to have the following percentages of diverse individuals eligible for management and executive positions:
  - 48.8% Women.
  - 20.7% People of color (Black, African American, Hispanic, Latinx, and Indigenous people).
  - 20% L.G.B.T.Q.+ individuals.
  - 12% Individuals with disabilities.
  - 7% Veterans
- It shall be a goal of the Company to ensure that 100% of its employees receive training on diversity and sensitivity.
- It shall be a goal of the Company to endeavor to engage diverse construction vendors during its efforts to develop, renovate and construct its Establishment. Therefore, to the extent feasible, the Company shall engage vendors as follows:
  - 48.8% Women.
  - 20.7% People of color (Black, African American, Hispanic, Latinx, and Indigenous people).
  - 20% L.G.B.T.Q.+ individuals.
  - 12% Individuals with disabilities.
  - 7% Veterans.

### **Programs:**

To the extent reasonably practicable, the Company shall implement the following programs:

- In an effort to ensure it has the opportunity to interview, and hire a diverse staff, the Company will post monthly notices for three (3) months during the hiring process for any of its Marijuana Establishments in newspapers of general circulation in the areas of the Establishment. These notices will state that the Company is specifically looking for women, people of color (particular Black, African American, Hispanic, Latinx, and Indigenous people), L.G.B.T.Q.+ individuals, veterans, and persons with disabilities to work for the Company.

## **Silver Therapeutics of Palmer, Inc.**

- In an effort to ensure the Company meets its goal of offering advancement to management and executive positions internally, the Company shall offer 100% of the Company's opportunities for advancement internally, as follows:
  - By providing opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals including minorities, women, veterans, people with disabilities, and L.G.B.T.Q. +, for advancement;
  - The Company targets hiring and advancing individuals consistent with the Total Civilian Labor Force for Massachusetts are as follows:
    - 48.8% Women.
    - 20.7% People of color (Black, African American, Hispanic, Latinx, and Indigenous people)
    - 20% L.G.B.T.Q.+, individuals.
    - 7% Veterans.
    - 12% Individuals with disabilities
  - Similar to the above, during the time of the Company's need for management and executive positions, the Company will first communicate this internally by sending out email notifications to its employees.
  - If the position is not filled internally, as noted above, the Company will post monthly notices for three (3) months during the hiring process in newspapers of general circulation in the area of the Establishment, and other newspapers such as the Daily Hampshire Gazette, the Sun and the Republican.
- As described above, it is a goal of the Company to seek parity in its workforce. Accordingly, the Company shall form a diversity and equity committee to monitor the Company's progress towards meeting those goals. This committee will meet quarterly to review and assess the Company's hires and hiring practices. Meeting Minutes will be provided to the Commission on request and for the Company's annual license renewal application.
- The Company shall require that 100% of its employees receive education on diversity, implicit biases and sensitivity within the first ninety (90) days of employment and once annually thereafter.
- As referenced above, it is a goal of the Company to engage diverse construction vendors during its efforts to develop, renovate and construct its Establishment. Therefore, during this phase of the development, the Company shall target women, people of color (particular Black, African American, Hispanic, Latinx, and Indigenous people), L.G.B.T.Q.+ individuals, veterans, and persons with disabilities to work for the Company.

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### **Measurements:**

To the extent reasonably practicable and as allowed by law, the Company shall implement the following measurements:

Pursuant to 935 CMR 500.103(4)(a) the Company's diversity and equality committee shall prepare an annual report identifying the Company's efforts to encourage diversity in the work place, in compliance with 935 CMR 500.101(1)(c)(8)(k) and this Diversity Policy. Specifically, said report shall identify the demographics of its employee population including but not limited to identifying the gender, race, sexual orientation and disabled status of its employees without identifying the employee specifically and to the extent each employee is willing to share such information.

Additionally, this report will include the following metrics:

- a. Number of individuals from the target demographic groups who were hired and retained after the issuance of a license, and this number will be assessed from the total number of individuals hired to ensure that 50% of all individuals hired fall within the target demographic groups;
- b. Number of promotions for people falling into the target demographics since initial licensure and number of promotions offered;
- c. Number of jobs created since initial licensure;
- d. Number of job postings in publications with supporting documentation; and
- e. Number and subject matter of internal programs and trainings.

The Company affirmatively states that: (1) it acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; (2) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws and (3) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of its provisional license.

This policy may also be referred to by the Company as the "**Diversity Plan**".