Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281271

Original Issued Date: 12/31/2018

Issued Date: 01/14/2021

Expiration Date: 01/16/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Silver Therapeutics, Inc.

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

Business Address 1: 82 Wendell Ave **Business Address 2:** Suite 100

Business City: Pittsfield **Business State:** MA **Business Zip Code:** 01201

Mailing Address 1: 89 Court Street **Mailing Address 2:**

Mailing City: Saratoga Springs **Mailing State:** NY **Mailing Zip Code:** 12866

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201854

RMD INFORMATION

Name of RMD: Silver Therapeutics, Inc.

Department of Public Health RMD Registration Number: RPA201854

Operational and Registration Status: Obtained Provisional Certificate of Registration only

To your knowledge, is the existing RMD certificate of registration in good standing?: yes

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 29.6 **Percentage Of Control:** 33.33

Role: Owner / Partner **Other Role:** Executive

First Name: Joshua **Last Name:** Silver **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 29.6 **Percentage Of Control:** 33.33

Role: Owner / Partner **Other Role:** Executive

First Name: Brendan **Last Name:** McKee **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 29.6 **Percentage Of Control:** 33.33

Role: Owner / Partner **Other Role:** Executive

First Name: Joshua **Last Name:** Ferranto **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

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

Entity Phone: 518-570-9067 **Entity Email:** josh@agtherapeutcis.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

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: 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

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: 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 Transporter with Other Existing ME License

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 2

First Name: Joshua **Last Name:** Silver **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 3

First Name: Joshua **Last Name:** Silver **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 4

First Name: Joshua **Last Name:** Silver **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 5

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 6

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 7

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 8

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 9

First Name: Joshua **Last Name:** Ferranto **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 10

First Name: Joshua **Last Name:** Ferranto **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 11

First Name: Joshua **Last Name:** Ferranto **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 12

First Name: Joshua **Last Name:** Ferranto **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Orange **Marijuana Establishment State:** MA

Individual 13

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 14

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 15

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 16

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 17

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 18

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 19

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Boston **Marijuana Establishment State:** MA

Individual 20

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Boston **Marijuana Establishment State:** MA

Individual 21

First Name: Brendan **Last Name:** McKee **Suffix:**

Marijuana Establishment Name: Silver Therapeutics, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Boston **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 238 Main Street

Establishment Address 2:

Establishment City: Williamstown **Establishment Zip Code:** 01267

Approximate square footage of the establishment: 708 **How many abutters does this property have?:** 4

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	Host Community Agreement Certification.pdf	pdf	5adf4ac36d28ab7e8e788dd7	04/24/2018
Plan to Remain Compliant with Local Zoning	935 CMR 500.101(2)(b)(9) Compliance with local zoning.pdf	pdf	5adf602147a84a7e843c3b2f	04/24/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form w Attachments.pdf Rev2.pdf	pdf	5b3664b253361a503c1d5e8a	06/29/2018

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.: $105688

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Ltr re Positive Impact.pdf	pdf	5ae755b1d7af757e74820d19	04/30/2018

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: **Other Role:**

First Name: Joshua **Last Name:** Silver **Suffix:**

RMD Association: RMD Owner

Background Question: no

Individual Background Information 2

Role: **Other Role:**

First Name: Brendan **Last Name:** McKee **Suffix:**

RMD Association: RMD Owner

Background Question: no

Individual Background Information 3

Role: **Other Role:**

First Name: Joshua **Last Name:** Ferranto **Suffix:**

RMD Association: RMD Owner

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Good Standing Tax 4 10 18.pdf	pdf	5ad89d097212167e7aeed82b	04/19/2018
Secretary of Commonwealth - Certificate of Good Standing	Good Standing 4 9 18.pdf	pdf	5ad89d336d28ab7e8e788951	04/19/2018
Articles of Organization	Articles of Organization.pdf	pdf	5ad8a01d47ddff7eac6623a0	04/19/2018
Bylaws	By Laws Silver Therapeutics, Inc.pdf	pdf	5ad8a026d7af757e74820477	04/19/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload

				Date
Secretary of Commonwealth - Certificate of Good Standing	Good Standing - SOS - 10.08.20.pdf	pdf	5fa0b1b28cc05c081b1b62c3	11/02/2020
Department of Revenue - Certificate of Good standing	Good Standing Tax 10 13 20.pdf	pdf	5fa0b1b45b823307b79b5bd5	11/02/2020
Department of Unemployment Assistance - Certificate of Good standing	Cert of GS - DUA 10.16.2020.pdf	pdf	5fa0b1b570836208402852ab	11/02/2020

Massachusetts Business Identification Number: 001258563

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Timeline.pdf	pdf	5dbb3ad663788d2fee31788c	10/31/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Separating recreational from medical operations, if applicable	Separating Rec. from Med..pdf	pdf	5fa0b3500daeb60847fab129	11/02/2020
Plan for obtaining marijuana or marijuana products	Plan to Obtain Products.pdf	pdf	5fa0b35208242707d4a76b5d	11/02/2020
Restricting Access to age 21 and older	Restricting Access.pdf	pdf	5fa0b35abd0d8e081433bdd8	11/02/2020
Security plan	Security Plan.pdf	pdf	5fa0b37d75aac308359abdf3	11/02/2020
Prevention of diversion	Diversion Prevention.pdf	pdf	5fa0b37edd2d7407bedeaec4	11/02/2020
Storage of marijuana	Storage Policy.pdf	pdf	5fa0b37f3bf49c082a425313	11/02/2020
Transportation of marijuana	Transportation Policy.pdf	pdf	5fa0b37fa75869080486af2e	11/02/2020
Inventory procedures	Inventory Policy.pdf	pdf	5fa0b3818cc05c081b1b62cd	11/02/2020
Quality control and testing	Quality Control.pdf	pdf	5fa0b39adfcf9f07cd943d03	11/02/2020
Dispensing procedures	Retail Dispensing.pdf	pdf	5fa0b39b0daeb60847fab12d	11/02/2020
Personnel policies including background checks	Personnel Policy.pdf	pdf	5fa0b39c08242707d4a76b61	11/02/2020
Record Keeping procedures	Record Keeping.pdf	pdf	5fa0b39cedc7d60856d963bb	11/02/2020
Maintaining of financial records	Maintaining Financial Records.pdf	pdf	5fa0b39ddf85ec07dfb87f27	11/02/2020
Diversity plan	Diversity Plan.pdf	pdf	5fa0b3b357d9d707ee4d74f8	11/02/2020
Qualifications and training	Employee.pdf	pdf	5fa0b3b4bd0d8e081433bddc	11/02/2020
Energy Compliance Plan	Energy Compliance Policy.pdf	pdf	5fa0b4978cc05c081b1b62d1	11/02/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Patient Supply Plan.pdf	pdf	5fa0b4ad4a2789086108c381	11/02/2020

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Product Discontinuance Plan.pdf	pdf	5fa0b4afbd0d8e081433bde0	11/02/2020

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 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 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.:

Notification: I Understand

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 Agree

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 Agree

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Silver Therapeutics, Inc. (the "Company") has worked diligently to ensure that its Marijuana Retailer has a positive impact on its host community and on areas of disproportionate impact as defined by the Commission (each an "ADI"). In compliance with its positive impact plan, the Company held multiple job fairs and posted notices in newspapers of general circulation in ADI's near it's Marijuana Retailer, such as the Berkshire Eagle, the Daily Hampshire Gazette, the Greenfield Recorder, the Amherst Bulletin and the Pittsfield Gazette. As a result of this outreach, approximately 40% of its Williamstown workforce is from the nearby ADI of North Adams MA. Another tenant of the Company's positive impact plan was to provide its employees with opportunities to advance within the Company via management training programs. The Company has had ten (10) employees participate in this program. The Company has attached copies of its newspaper advertisements, attendance records at job fairs and the expungement clinic, as well as a copy of the presentation provided for the attendees of the expungement clinic as additional supporting evidence of the Company's compliance with its plan for positive impact. The Company has also uploaded its revised Positive Impact Plan, which is consistent with current CCC regulations and guidance. Additionally, at its September 10, 2019 job fair, the Company hired an attorney to hold an expungement clinic for Massachusetts residents with past drug convictions (or whose parents or spouses have past drug convictions). The information obtained for the presentation was done with guidance from the MA ACLU for accuracy and is included as a separate attachment. Seven (7) individuals attended this meeting. The Company is also posting a free, pre-recorded, virtual legal briefing on the expungement and record sealing process for the entire month of December 2020. A copy of the notice for this event is included herewith.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Silver Therapeutics Inc. (the "Company") has worked diligently to comply with its diversity plan and to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation in the recruitment and hiring of employees. The Company respectfully submits the following measurements pursuant to its diversity plan: (1) The Company has employed 16 women, 3 people of color and 1 veteran; (2) 1 veteran and 4 women have been promoted to management level positions; (3) the Company has created 36 total jobs; (4) All employees engaged in an initial training course covering the benefits of workplace diversity, the importance of sensitivity and inclusion, and the legal basis for providing an equal opportunity workplace and are required to complete this training once annually; (5) The Company posted notice of its job openings in the following publications: Berkshire Eagle, the Daily Hampshire Gazette, the Greenfield Recorder, the Amherst Bulletin and the Pittsfield Gazette.

HOURS OF OPERATION

Monday From: 10:00 AM	**Monday To:** 8:00 PM
Tuesday From: 10:00 AM	**Tuesday To:** 8:00 PM
Wednesday From: 10:00 AM	**Wednesday To:** 8:00 PM
Thursday From: 10:00 AM	**Thursday To:** 8:00 PM
Friday From: 10:00 AM	**Friday To:** 8:00 PM
Saturday From: 10:00 AM	**Saturday To:** 8:00 PM
Sunday From: 10:00 AM	**Sunday To:** 8:00 PM

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. 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(1).

Applicant

I, Joshua Silver, (*insert name*) certify as an authorized representative of Silver Therapeutics, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Williamstown (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on February 12, 2018 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Jason Hoch, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Williamstown (*insert name of host community*) to certify that the applicant and Town of Williamstown (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 12 Feb 2018 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

Joshua Silver, Esq.
89 Court Street
Saratoga Springs, NY 12866
(518) 570-9067
joshuaasilver@gmail.com

April 23, 2018
VIA ONLINE SUMISSION ONLY

Cannabis Control Commission
101 Federal Street, 13th floor
Boston, MA 02110

Applicant:	Silver Therapeutics, Inc.
License Type:	Marijuana Retailer
Location:	238 Main Street, Williamstown, MA
Packet:	Application of Intent – Plan for Compliance with Local Zoning
Rule:	**935 CMR 500.101(2)(b)(9)**

Dear Commission Staff:

I am the Chief Executive Officer of Silver Therapeutics, Inc. (the "Company"). This letter is submitted in response to the requirement set forth in 935 CMR 500.101(2)(b)(9), which provides:

If physically separate from the RMD location a description of plans plans to ensure that the Marijuana Establishment is or will be compliant with local codes, ordinances and bylaws for the physical address of the Marijuana Establishment which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

RESPONSE: The location of the proposed Marijuana Retailer is the same as the RMD location approved by the DPH for a Provisional Certificate of Registration.

The Town of Williamstown has adopted a zoning ordinance that limits the siting of a "Marijuana Retail" establishment to the SG and PB zones. A copy of the Town's Schedule of Uses, Zoning Map, and definition of Marijuana Retail, are enclosed. 238 Main Street is in a PB Zone, where a Marijuana Retailer is an approved use pursuant to the issuance of a Special Permit by the Williamstown Board of Appeals.

At a meeting of the Williamstown Board of Appeals on April 19, 2018, the Company was, in fact, issued a Special Permit. As such, the Company is now eligible to apply for a building permit. The Company will comply with all of Williamstown's zoning regulations by coordinating its efforts to obtain a building permit with the Town's Code Enforcement Officer.

Williamstown's zoning ordinance does not create setback requirements or otherwise reduce the Buffer Zone requirements of 935 CMR 110(3). A list of uses within 500 feet of 238 Main Street, Williamstown, MA is enclosed. There are no public or private schools providing education in kindergarten or any of grades one through 12 within such buffer area.

Joshua Silver, CEO

RELEVANT PROVISIONS FROM WILLIAMSTOWN ZONING BYLAWS

Chapter 70. Zoning

Article IX. Definitions

§ 70-9.2. Terms defined.

For the purposes of this chapter, the following terms, abbreviations and words shall be defined as follows, unless a contrary meaning is required in the context or is specifically prescribed elsewhere in the Bylaw. Terms not defined herein shall have the meaning given in definitions, if any, found in the latest versions of these sources, in this order: Chapter 170, Subdivision Rules and Regulations adopted by the Williamstown Planning Board, the Massachusetts State Building Code and Webster's Unabridged Dictionary.

AC

Acre(s).

ACCESSORY BUILDING

A building devoted exclusively to an accessory use as herein defined, and not attached to a principal building by any roofed structure.

ACCESSORY USE

An activity incidental to and located on the same premises as a principal use conducted by the same person or his agent. No use (other than parking) shall be considered accessory unless functionally dependent on and occupying less land area than the principal use to which it is related and occupying less than 1/3 as much gross floor area as that principal use, or such larger share as this chapter may specify for particular uses.

ACT

The Telecommunications Act of 1996.
[Added 5-19-1998 ATM, Art. 25]

ADEQUATE COVERAGE

Coverage is considered to be "adequate" within the area surrounding a base station where the predicted or measured median field strength of the transmitted signal is greater than -95 dbm. It is acceptable for there to be holes within the area of adequate coverage where the signal is less than -95dbm, as long as the signal regains its strength to greater than -95 dbm further away from the base station. For the limited purpose of determining whether the use of a repeater is necessary or desirable, there shall be deemed not to be adequate coverage within said holes. The outer boundary of the area of adequate coverage, however, is that location past which the signal does not regain a strength of greater than -95 dbm.
[Added 5-19-1998 ATM, Art. 25]

ADEQUATE CAPACITY

Capacity is considered to be "adequate" if the grade of service is p.05 or better for at least 50% of the days in the preceding month, prior to the date of application, as measured using direct traffic measurement of the personal wireless service facility in question, where the call blocking is due to frequency contention at the antenna(s).
[Added 5-19-1998 ATM, Art. 25]

AIRPORT OR HELIPORT

A facility for the landing and takeoff of aircraft, with or without incidental service, storage or sales, if having a level of activity requiring it to have a certificate of approval from, or annual registration with, the

MAJOR RESIDENTIAL DEVELOPMENT

Either of the following from or on a parcel or set of contiguous parcels in common ownership as of the effective date of this provision:
[Amended 5-18-2004 ATM, Art. 28; 5-16-2006 ATM, Art. 38]

A. Land division (whether subdivision or not, as defined by MGL c. 41, § 81L) so as to increase the number of buildable lots by more than seven. Lots which would otherwise be buildable, but have been permanently restricted in order to prevent any residential use, shall not be counted for these purposes.

B. Issuance of building permits for the construction of more than eight dwelling units on premises other than assisted living residence, or in the Cable Mills Redevelopment District, or in the Village Business District or land division noted above.
[Amended 5-15-2007 ATM, Art. 32; 5-19-2009 ATM, Art. 32]

MANUFACTURING

A mechanical or chemical transformation of materials or components into new products, including fabrication, processing, finishing or packaging.

MARIJUANA PRODUCTION FACILITY

An entity licensed by the Cannabis Control Commission or having received a final certificate of registration from the Massachusetts Department of Public Health to cultivate and/or obtain, manufacture, process and package marijuana and marijuana products, to deliver marijuana and marijuana products to marijuana retail establishments and to transfer marijuana and marijuana products to other marijuana retail establishments, but not to consumers, in accordance with applicable Massachusetts General Laws.
[Added 5-16-2017 ATM, Art. 36]

MARIJUANA RETAIL

An establishment licensed by the Cannabis Control Commission or having received a final certificate of registration from the Massachusetts Department of Public Health to purchase and deliver marijuana and marijuana products from marijuana production facilities and to deliver, sell or otherwise transfer marijuana and marijuana products to other marijuana retail establishments and consumers, for recreational or medicinal means in accordance with applicable Massachusetts General Laws and state regulations.
[Added 5-16-2017 ATM, Art. 36]

MARIJUANA TESTING FACILITY

An entity licensed by the Cannabis Control Commission or having received a final certificate of registration from the Massachusetts Department of Public Health to test marijuana and marijuana products, including certification for potency and the presence of contaminants, in accordance with applicable Massachusetts General Laws.
[Added 5-16-2017 ATM, Art. 36]

MAXIMUM EXTENT PRACTICABLE

For purposes of a stormwater management plan (see § 70-5.3B), an applicant seeking to demonstrate compliance with some or all of the standards set forth in the DEP Massachusetts Stormwater Handbook to the maximum extent practicable shall demonstrate (i) that it has made all reasonable efforts to meet each of the applicable standards, (ii) that it has made a complete evaluation of all possible stormwater management measures, including environmentally sensitive site design that minimizes land disturbance and impervious surfaces, structural stormwater best management practices (BMPs), pollution prevention, erosion and sedimentation control, and proper operation and maintenance of stormwater BMPs, and (iii) if full compliance with the standards cannot be achieved, the applicant is implementing the highest practicable level of stormwater management.
[Added 5-17-2011 ATM, Art. 34]

MEDICAL OFFICE

A building or portion thereof where patients are seen for examination and/or treatment by one or more physicians, dentists or other medical personnel, psychologists, or social workers.
[Added 5-17-2016 ATM, Art. 31]

MEMBERSHIP CLUB

Chapter 70. Zoning

Article III. Use Regulations

§ 70-3.1. General requirements.

A. Basic requirement.

(1) Buildings or structures shall be constructed, and buildings, structures or land shall be used, in whole or in part, only as permitted under § 70-3.3, Use Regulation Schedule, except as may be provided in § 70-1.4 for certain cases of nonconformity. Uses permitted and uses allowed on special permit must also be in conformity with all the density and dimensional regulations and other pertinent requirements of this chapter.

(2) Additional regulation of uses is found in various places in this chapter. Attention is particularly drawn to:

(a) For the Rural Residence District 1: § 70-3.4A.

(b) [1]For the Village Business District: § 70-3.4C.
[Amended 5-19-2009 ATM, Art. 32[2]]

[1] *Editor's Note: Former Subsection A(2)(b), regarding the Business Campus District, was repealed 5-18-2010 ATM, Art. 27. This article also redesignated former Subsection A(2)(c) and (d) as Subsection A(2)(b) and (c), respectively.*

[2] *Editor's Note: This article also redesignated former Subsection A(2)(c) as Subsection A(2)(d).*

(c) For locations in the Floodplain, Upland Conservation, Mobile Home Park, Water Resource, Confined Aquifer Overlay, Cable Mills Redevelopment Districts: § 70-7.4.
[Amended 5-18-2004 ATM, Art. 28; 5-15-2007 ATM, Art. 29; 5-15-2007 ATM, Art. 32]

B. Schedule notation. Notations in the Use Regulation Schedule shall mean the following:
[Amended 5-19-2009 ATM, Art. 32; 5-18-2010 ATM, Arts. 27, 32]

Yes: A use permitted as a matter of right.

BA: A use allowable on special permit from the Board of Appeals.

SPS: A use permitted as a matter of right, except requiring a special permit from the Board of Appeals if involving drive-in or drive-through facilities, or if the area created on the premises subsequent to May 23, 1989, would exceed the following:

— PB District: 20,000 square feet of cumulative gross floor area

— LI District:

1) Research and development or manufacturing for renewable energy: 50,000 square feet of cumulative gross floor area.

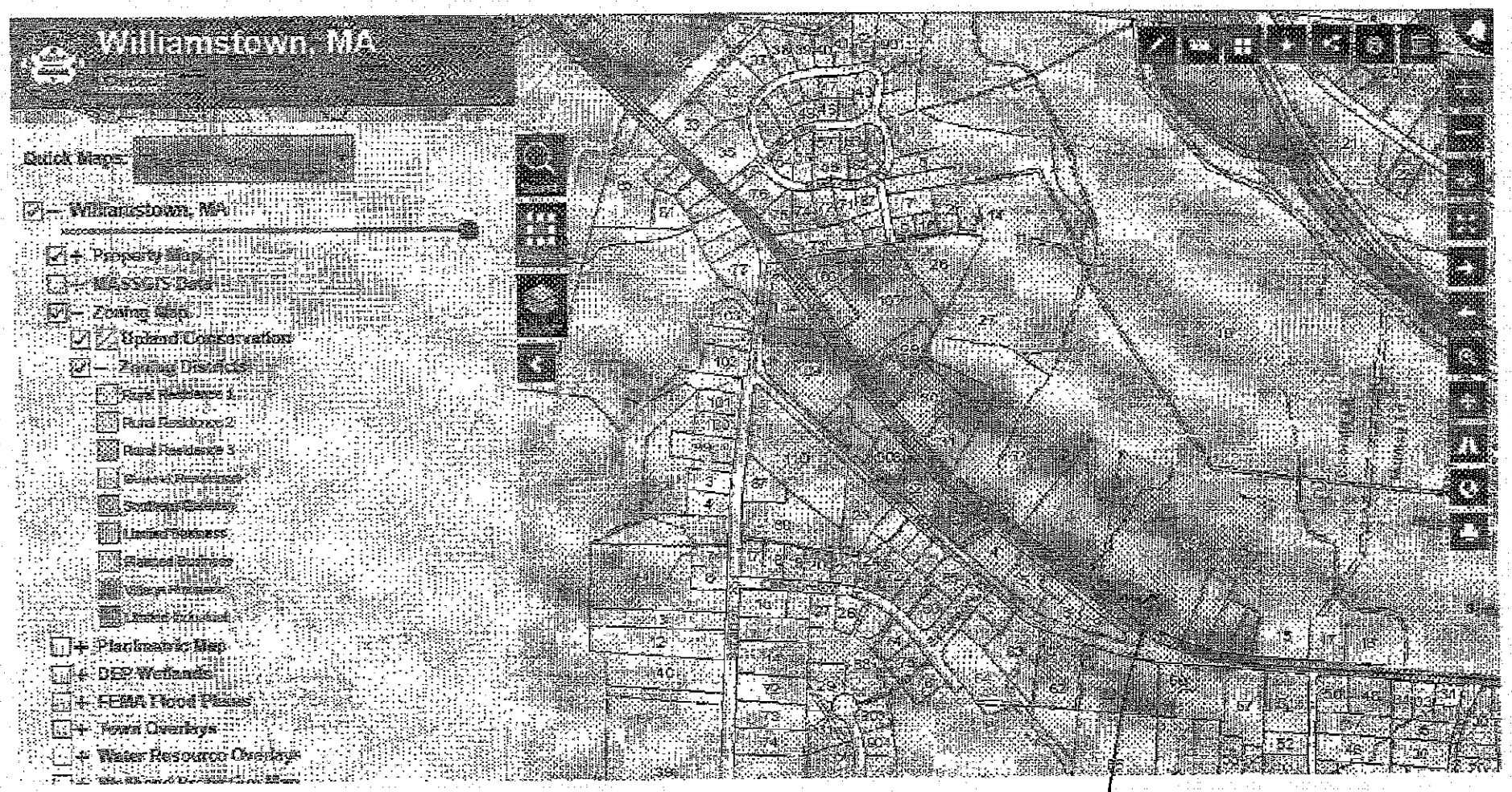
2) Other uses: 20,000 square feet of cumulative gross floor area.

— VB Distric: 5,000 square feet of building area

— LI or PB District: 20,000 square feet of cumulative gross floor area.

— VB District: 5,000 square feet of building area.

Use Regulation Schedule Town of Williamstown								
§ 70-3.3. USE REGULATION SCHEDULE	**Districts**							
	RR1	**RR2 RR3**	**GR**	**LB**	**SG**	**VB**	**PB**	**LI**
For not more than four persons, in a house also occupied as a private residence	No	Yes	Yes	BA	Yes	No	No	No
Tourist home	BA	BA	BA	BA	BA	SPS	SPS	No
Hotel or motel	No	No	No	BA	Yes	SPS	SPS	No
Theater, hall, bowling alley, skating rink, club or other place for exercise, amusement or assembly	No	No	No	BA	No	SPS	SPS	No
Business office								
500 square feet gross floor area or less	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
More than 500 but less than 5,000 square feet gross floor area	No	No	BA	Yes	BA	Yes	Yes	Yes
More than 5,000 square feet gross floor area	No	No	No	BA	BA	Yes	Yes	Yes
Medical office								
500 square feet gross floor area or less	No	BA	BA	Yes	Yes	Yes	Yes	Yes
More than 500 but less than 5,000 square feet gross floor area	No	No	BA	Yes	BA	Yes	Yes	Yes
More than 5,000 square feet gross floor area	No	No	No	BA	BA	Yes	Yes	Yes
Bank	No	No	No	Yes	No	SPS	SPS	No
Other retail or service:								
Principally within buildings Principally outdoors	No No	No No	No No	Yes No	No No	SPS No	SPS No	No No
Passenger depot, terminal	No	No	No	BA	No	No	No	No
Bus or taxi station	No	No	No	No	No	SPS	SPS	No
Weddings and family celebrations on farms (See § 70-7.2H.)	No	BA	No	No	No	No	No	No
Small concerts on farms (See § 70-7.2I.)	No	BA	No	No	No	No	No	No
Self storage	No	No	No	No	No	No	Yes	No
Marijuana retail	No	No	No	No	BA	No	BA	No
Marijuana production facility	No	BA	No	No	No	No	No	BA
Marijuana testing facility	No	No	No	No	No	No	No	BA
(3) INDUSTRIAL USES								
Medical, dental or research laboratory	No	No	No	No	No	No	No	SPS
Printing or publishing establishment:								
Under 2,000 square feet leasable floor area	No	No	No	Yes	No	SPS	SPS	SPS
Others	No	No	No	No	No	No	No	SPS



238 Main St. - PB Zone

LIST OF USES WITHING 500 FEET OF 238 BROADWAY

Parcel Number	Property Address	Owner Name	Co Owner Name	Owner Address	Owner State	Owner City	Owner Zip	Existing Use
111-032-000	320 MAIN ST	WILD OATS COOPERATIVE, INC		320 MAIN STREET	MA	WILLIAMSTOWN	01267	Grocery Store
112-004-000	311 MAIN ST	HIGH MEADOWS ASSOCIATES NOMINEE TRUST		311 MAIN STREET	MA	WILLIAMSTOWN	01267	Professional Offices
112-005-000	295 MAIN ST	LIMRA REALTY, LLC	WILLIAMSTOWN MOTEL	295 MAIN STREET	MA	WILLIAMSTOWN	01267	Motel
112-006-000	279 MAIN ST	WESTALL, DAVID J		31 HAWTHORNE COURT	MA	WILLIAMSTOWN	01267	Professional Offices
112-008-000	273 MAIN ST	ADAMS COMMUNITY BANK		2 CENTER STREET	MA	ADAMS	01220	Bank
112-009-000	259 MAIN ST	259 MAIN ST MA, LLC		1983 ROUTE 52 - SUITE 1A	NY	HOPEWELL JUNCTION	12533	Gas Station
112-011-000	296 MAIN ST	MOUNTAIN ONE BANK	ATTN: DEBRA WOOLEY	93 MAIN STREET - PO BOX 997	MA	NORTH ADAMS	01247	Bank
112-015-000	166 MAIN ST	SAULT, CYNTHIA J & EVAN P COOK		PO BOX 1762	MA	NORTH ADAMS	01247	Residence
112-017-000	148 MAIN ST	BOTTOM LINE REAL ESTATE, LLC		148 MAIN STREET	MA	WILLIAMSTOWN	01267	Professional Offices
112-018-000	132 MAIN ST	KIEF, PEARL M ESTATE	C/O CORINNE MILNE	804 OCEAN DRIVE	FL	BOYNTON BEACH	33426	Residence
112-019-000	60 MAIN ST	TOWN OF WILLIAMSTOWN	FORMER SPRUCES MHP	31 NORTH STREET	MA	WILLIAMSTOWN	01267	Retirement Home
112-048-000	129 MAIN ST	AMES, THEODORE H & TRUDY R		129 MAIN STREET	MA	WILLIAMSTOWN	01267	Residence
112-050-000	147 MAIN ST	BROOKS, DEBORAH A		147 MAIN STREET	MA	WILLIAMSTOWN	01267	Residence
112-051-000	171 MAIN ST	DEGRAFF, LINDA G		171 MAIN STREET	MA	WILLIAMSTOWN	01267	Residence
112-055-000	30 SUNSET DR	REINHARD, COLLEEN T		30 SUNSET DRIVE	MA	WILLIAMSTOWN	01267	Residence
112-057-000	187 MAIN ST	WESTALL, DARCY M		31 HAWTHORNE COURT	MA	WILLIAMSTOWN	01267	Professional Offices
112-058-000	199 MAIN ST	SHARASWATI, INC		213 MAIN STREET	MA	WILLIAMSTOWN	01267	Residence
112-060-000	217 MAIN ST	HADDAD, JULIA F - LIFE TENANT	MICHAEL HADDAD, JR & DEBORAH H ACKLEY	194 LONGVIEW TER	MA	WILLIAMSTOWN	01267	Vacant (former restaurant)

112-062-000	35 ADAMS RD	WILLIAMSTOWN HOUSING AUTHORITY		35 ADAMS ROAD	MA	WILLIAMSTOWN	01267	Assisted Living Residences
112-063-000	45 ADAMS RD	WILLIAMSTOWN HOUSING AUTHORITY		35 ADAMS ROAD	MA	WILLIAMSTOWN	01267	Assisted Living Residences
112-086-000	25 ADAMS RD	WILLOWOOD OF WMSTOWN, INC	C/O BERKSHIRE HEALTH CARE SERVICES	75 NORTH STREET, SUITE 210	MA	PITTSFIELD	01201	Professional Offices
112-089-000	46 SUNSET DR	GOODWIN, MICHAEL S & ELINOR M		46 SUNSET DRIVE	MA	WILLIAMSTOWN	01267	Residence
112-113-000	212 MAIN ST	DJ2Z LLC	C/O JULIE ARNOLD	1 BANK STREET	MA	WILLIAMSTOWN	01267	Retail Store
112-114-000	200 MAIN ST	IONG KEI TRUST, CHE IONG &	CHE CHUNG CHI, TR,	26 WALNUT STREET	MA	SOMMERVILLE	02143	Retail Store
112-115-000	190 MAIN ST	ROSS, LAWRENCE J & PATRICIA V TRUSTEES	ROSS FAMILY REVOCABLE TRUST	190 MAIN STREET	MA	WILLIAMSTOWN	01267	Professional Offices
112-117-000	7 SYCAMORE DR	GOSS, PATRICIA A - LIFE TENANT	C/O KATHLEEN A WALL	80 KEMP AVENUE	MA	NORTH ADAMS	01247	Residence
112-118-000	15 SYCAMORE DR	LANGE, EWALD H & RENATE J LT	EWALD RENATE LANGE 2011 FAM IRREV TRUST	15 SYCAMORE DR	MA	WILLIAMSTOWN	01267	Residence

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. 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(1).

I, Joshua Silver, (*insert name*) attest as an authorized representative of Silver Therapeutics, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on March 24, 2018 (*insert date*).

2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on March 14, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).*

3. A copy of the meeting notice was also filed on March 14, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).

4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on March 14, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner 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. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

Initials of Attester: JS

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

5. Information was presented at the community outreach meeting including:
    a. The type(s) of Marijuana Establishment to be located at the proposed address;
    b. Information adequate to demonstrate that the location will be maintained securely;
    c. Steps to be taken by the Marijuana Establishment to prevent diversion to minors;
    d. A plan by the Marijuana Establishment to positively impact the community; and
    e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Initials of Attester: JS

ATTACHMENT "A"

NATIONAL FOOTBALL LEAGUE

AFC East free agency look

The Associated Press

BUFFALO BILLS (9-8)

UNRESTRICTED FREE AGENTS: WRs Jordan Matthews, Deonte Thompson, Brandon Tate, and Jeremy Butler; CBs E.J. Gaines, Leonard Johnson, and Shareece Wright; LBs Preston Brown and Ramon Humber; DT Cedric Thornton; Ss Colt Anderson and Shamarko Thomas; RBs Travaris Cadet and Taiwan Jones; FB Mike Tolbert; OT Seantrel Henderson; QB Joe Webb.

RESTRICTED FREE AGENTS: None.

NEEDS: Quarterback moved to the top of the list after Buffalo traded three-year starter Tyrod Taylor to the Cleveland Browns in exchange for a third-round pick. The deal leaves Nathan Peterman — a fifth-round draft pick last year — as the only quarterback on the roster. Aside from free agency, the Bills are anticipated to select a quarterback in the draft. The defensive front seven could be in store for major overhaul, though Williams re-signed. Starters Brown and Humber are eligible for free agency. Unanticipated hole to fill is center after Eric Woods was diagnosed with career-ending neck injury in January. Bills already addressed needs by signing nine-year veteran CB Vontae Davis and running back Chris Ivory, who is expected to take over as LeSean McCoy's primary backup.

AVAILABLE SALARY CAP SPACE (approximately): $37 million.

MIAMI DOLPHINS (6-10)

UNRESTRICTED FREE AGENTS: SS Michael Thomas, Walt Aikens and S Nate Allen; QBs Matt Moore and Jay Cutler; LBs Lamin Barrow and Koa Misi; G Jermon Bushrod; LS John Denney; TE Anthony Fasano; DEs Terrence Fede and William Hayes; K Cody Parkey; CB Alterraun Verner; RB Damien Williams; OT Sam Young.

RESTRICTED FREE AGENTS: QB David Fales; LB Neville Hewitt; G Anthony Steen.

NEEDS: After backsliding in Year 2 under coach Adam Gase, Dolphins need starters at tight end, linebacker, receiver and perhaps two offensive line positions. They need more depth at running back and safety. Miami already made two significant moves, agreeing to trade receiver Jarvis Landry to Browns for two draft picks, and agreeing to acquire Rams edge rusher Robert Quinn for mid-round draft pick. But with severe salary cap constraints and mediocre pool of free agent talent, Dolphins are unlikely to be as aggressive in free agency as in recent years.

AVAILABLE SALARY CAP SPACE (approximately): $4 million over.

NEW ENGLAND PATRIOTS (15-4)

UNRESTRICTED FREE AGENTS: CBs Malcolm Butler and Johnson Bademosi; WRs Danny Amendola and Matt Slater; RBs Dion Lewis and Rex Burkhead; OTs Nate Solder, Cam Fleming and LaAdrian Waddle; DTs Alan Branch and Ricky Jean Francois; LBs James Harrison and Marquis Flowers; DE Geno Grissom; FS Nate Ebner.

RESTRICTED FREE AGENTS: FS Brandon King; G Ted Karras.

NEEDS: Butler's comments following his Super Bowl benching point to exit for him and opening at cornerback. New England likes Burkhead and got big production in 2017 from Lewis. Both are just 27 years old, but Patriots likely won't stand pat after disappointing season by 2017 free agency pickup Mike Gillislee. Linebacking core needs some help with Harrison unlikely to be re-signed at age 39 and starter Dont'a Hightower coming off shoulder surgery. Getting another player to pair with Trey Flowers at defensive end will be another priority.

AVAILABLE SALARY CAP SPACE (approximately): $14.7 million.

NEW YORK JETS (5-11)

UNRESTRICTED FREE AGENTS: QB Josh McCown; CB Morris Claiborne; C Wesley Johnson, TEs Austin Seferian-Jenkins and Chris Gragg; LBs Demario Davis, Bruce Carter, Julian Stanford, and David Bass; S Terrence Brooks; PK Chandler Catanzaro; DLs Kony Ealy and Ed Stinson; DT Mike Pennel; OLs Jonotthan Harrison, Ben Ijalana and Dakota Dozier.

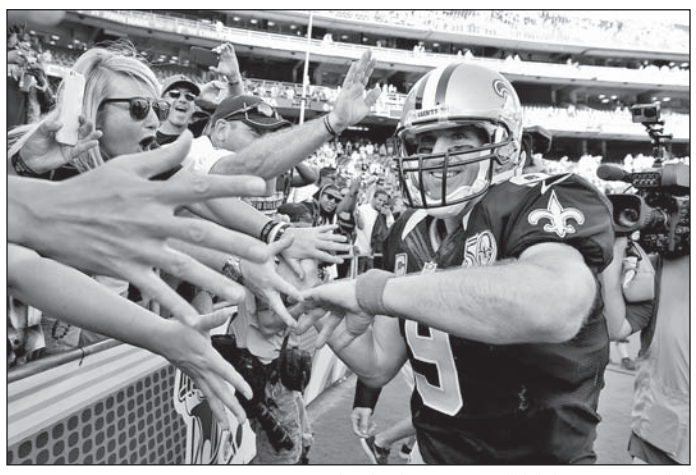
RESTRICTED FREE AGENTS: WR Quincy Enunwa; S Rontez Miles; OL Brent Qvale; TE Neal Sterling; DL Xavier Cooper.

NEEDS: It's all about finding quarterback, running theme for this franchise for, well, decades. New York will be in Kirk Cousins sweepstakes and has money it would take to land him. But will the former Washington QB want team that has failed to make playoffs for seven straight seasons and underwent massive rebuild last year? Jets have new offensive coordinator in former QBs coach Jeremy Bates, who runs Mike and Kyle Shanahan-style system Cousins learned during his first two seasons in league. If Jets whiff on Cousins, there's good chance McCown will be back to mentor whomever New York takes with its first draft pick at No. 6 overall. Plenty of holes elsewhere, although Jets are interested in re-signing Claiborne, Seferian-Jenkins and Davis as core players. Help on offensive line, namely at center, proven pass rusher and cornerback will also be high priorities for GM Mike Maccagnan. Running back Matt Forte is retired, so Jets might look for some depth in backfield, as well as on defensive line after releasing disappointing Muhammad Wilkerson.

AVAILABLE SALARY CAP SPACE (approximately): $90 million.

Brees, 39, back to NOLA

By Barry Wilner
The Associated Press



DENIS POROY — THE ASSOCIATED PRESS

New Orleans Saints quarterback Drew Brees has reportedly agreed to a two-year, $50 million extension with the team. Brees is 39 years old.

Drew Brees is staying put in the Big Easy. Case Keenum is headed to the Rocky Mountains.

Kirk Cousins? His first visit as a free agent will be to Minnesota, with the Vikings long considered a natural landing spot for one of the most valuable quarterbacks.

One day before the league's new year begins, quarterbacks are again stealing the spotlight, starting with Brees.

The Saints star has agreed to a two-year, $50 million extension with New Orleans, with $27 million guaranteed the first year, two people familiar with the contract told The Associated Press. They spoke on condition of anonymity Tuesday because the agreement has not been announced.

Brees is 39 and wants to finish his career in New Orleans, where he has played since 2006, won a Super Bowl and led what has been one of the most productive offenses in the NFL since he and coach Sean Payton arrived.

"I'll be here as long as they'll have me," Brees said after last season ended.

In 2017, Brees completed an NFL-record 72 percent of his passes for 4,334 yards and 23 touchdowns against eight interceptions. He ranked fourth in the NFL in yards passing and the Saints ranked second in the NFL in total offense.

Keenum, a backup when the season began, guided Minnesota to the NFC North title and then into the conference championship game. He'll cash in with the Broncos.

The 30-year-old Keenum is considered the second-best QB available in free agency. He went 11-3 with 3,547 yards passing, 22 touchdowns and seven interceptions. His last-second throw to Stefon Diggs stunned the Saints 29-24 in the playoffs.

Denver chose to bypass incumbents Trevor Siemian, Brock Osweiler and Paxton Lynch and go for Keenum, who can't sign until Wednesday.

Six years ago, GM John Elway landed Peyton Manning, the biggest free-agent prize in NFL history, following his release by the Colts and a series of neck fusion surgeries. Manning guided the Broncos to two Super Bowls and won the 2015 NFL championship. Now, Elway hopes another free agent will replicate Manning.

Cousins will visit with the Vikings on Wednesday, agent Mike McCartney said. ESPN reported that Cousins will sign with the Vikings, but McCartney said no decision has been made yet by his client.

The Jets and Cardinals also make sense as fits for the 29-year-old who played consecutive seasons for Washington on franchise tags. New York also has shown interest in Vikings QB Teddy Bridgewater and Arizona has done the same with Minnesota's Sam Bradford.

IN OTHER MOVES:

• Super Bowl champion Philadelphia lost two tight ends, cutting veteran Brent Celek, then saw Trey Burton agree to a four-year, $32 million contract with Chicago. The Bears also will be signing Jacksonville receiver Allen Robinson on Wednesday and placekicker Cody Parkey.

• Buffalo bolstered its interior defensive line, agreeing to a deal with Carolina tackle Star Lotulelei and re-signing Kyle Williams, who contemplated retirement.

Classifieds

Public Notices

CITY OF PITTSFIELD
ZONING BOARD OF APPEALS
NOTICE OF PUBLIC HEARING

Notice is hereby given that the Zoning Board of Appeals will give a hearing at the **City Hall, City Council Chambers on Wednesday March 21, 2018 at 7:00 P.M.,** to all parties interested in the petition of BVD Solar LLC requesting a special permit under Article 23 Section 7.824 of the Zoning Ordinance to allow the installation of a 566 KW solar photovoltaic facility. The premises affected are located at West Street, Parcel F08-0005-220 and is in an R-6 zoning district.
Albert A. Ingegni, III, Chairman
Zoning Board of Appeals
Pittsfield, MA
3/7/2018
3/14/2018

CITY OF PITTSFIELD
ZONING BOARD OF APPEALS
NOTICE OF PUBLIC HEARING

Notice is hereby given that the Zoning Board of Appeals will give a hearing at the **City Hall, City Council Chambers on Wednesday March 21, 2018 at 7:00 P.M.,** to all parties interested in the petition of Allegrone Companies (on behalf of 89 South Care Support, Inc) requesting a special permit under Article 23 Section 8.3 & 8.4 of the Zoning Ordinance to allow alteration and change of use of the abandoned nursing home to an independent senior living facility. The premises affected are located at 89 South Street and are in the B-D and D-A Overlay zoning districts.
Albert A. Ingegni, III, Chairman
Zoning Board of Appeals
Pittsfield, MA
3/7/2018
3/14/2018

CITY OF PITTSFIELD
ZONING BOARD OF APPEALS
NOTICE OF PUBLIC HEARING

Notice is hereby given that the Zoning Board of Appeals will give a hearing at the **City Hall, City Council Chambers on Wednesday March 21, 2018 at 7:00 P.M.**, to all parties interested in the petition of Michael Briggs requesting a variance from the requirements of Article 23 Section 4.203 of the Zoning Ordinance to allow the construction of a detached 2-car garage that will encroach 5 feet into the required front yard setback. The premises affected are located at 651 Pecks Rd and is in an R-20 zoning district.
Albert A. Ingegni, III, Chairman
Zoning Board of Appeals
Pittsfield, MA
03/07/18, 03/14/18

Commonwealth of Massachusetts
Division of Fisheries and Wildlife
PUBLIC HEARING NOTICE
321 CMR 3.02(2)

In accordance with the Massachusetts General Laws, Chapter 131, Sections 5 and 63, and Chapter 30A, Section 2, NOTICE is hereby given of a public hearing to be held on **Tuesday, April 10, 2018, at 3:00 p.m., at the Division of Fisheries and Wildlife's Field Headquarters, Richard Cronin Building, 1 Rabbit Hill Road, off North Drive, Westborough, Massachusetts,** to establish rules and regulations relative to the 2018-2019 migratory game bird seasons.
This legal notice is also posted on the Massachusetts Newspaper Publishers Association (MNPA) website at
http://masspublicnotices.org/
Jack Buckley, Director

Commonwealth of Massachusetts
Division of Fisheries and Wildlife
PUBLIC HEARING NOTICE
321 CMR 3.02(2)(4)(b)(2)

In accordance with the Massachusetts General Laws, Chapter 131, Section 5, and Chapter 30A, Section 2, NOTICE is hereby given of a public hearing to be held on **Tuesday, April 10, 2018, at 7:00 p.m., at the Division of Fisheries and Wildlife's Field Headquarters, Richard Cronin Building, 1 Rabbit Hill Road, off North Drive, Westborough, Massachusetts,** to amend rules and regulations relating to the archery deer season in Wildlife Management Zones 10-14.
This legal notice is also posted on the Massachusetts Newspaper Publishers Association (MNPA) website at
http://masspublicnotices.org/
Jack Buckley, Director
03/14/18

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court

INFORMAL PROBATE
PUBLICATION NOTICE
Docket No. BE18P0158EA

Estate of: Gordon Francis Giroux
Also Known As: Gordon F. Giroux
Date of Death: 10/22/2016

Berkshire Division
44 Bank Row
Pittsfield, MA 01201
(413) 442-6941

To all persons interested in the above captioned estate, by Petition of Petitioner **Judith A. Giroux of Adams MA**
Judith A. Giroux of Adams 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 Probate Code without supervision by the Court. Inventory and accounts are not required to be filed with the Court, but interested parties are entitled to notice regarding the administration from the Personal Representative and can petition the Court in any matter relating to the estate, including distribution of assets and expenses of administration. Interested parties are entitled to petition 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 Petitioner.

James J. Sisto, Esq.
Berkshire Elder Law Center PC
40 Main Street
North Adams, MA 01247
413-664-7700
03/14/18

Community Outreach Hearing
LEGAL NOTICE

In accordance with 935 CMR 500.101.B(2)(e), Berkshire Welco, LLC, will hold a Community Outreach Hearing on **MARCH 27th 2018 at 7:00 PM at 21 DEPOT SQUARE, 2ND FL., SHEFFIELD, MA 01257** concerning the proposed operation of a Marijuana Establishment pursuant to G. L. c. 94G and 935 CMR 500, et. seq. The address of the proposed activity is 1375 N. Main St., Sheffield, MA 01257. Interested residents may hear about the proposal and ask questions at the Community Outreach Hearing.

CHRIS WELD, CEO
MICHAEL COHEN, PRESIDENT
03/14/18

INVITATION TO BID
TOWN of TYRINGHAM

The Town of Tyringham will receive bids under MGL c.30, S39M for the replacement of a 24" culvert on Main Road (near 59/62 Main Road) until Wednesday, March 28, 2018 at 1:00 p.m. Bids for the project are to be submitted to the Selectmen's Office, Tyringham Town Hall, 116 Main Rd, Tyringham, MA 01264 on or before the above date and time. The bids will be publicly opened and read aloud on that date. The Board of Selectmen reserves the right to accept or reject any and all bids in the best interest of the Town. Complete specifications available on the town's web site:
www.tyringham-ma.gov and at the Town office, 116 Main Road, Tyringham, MA.

James Consolati, Chairman
Board of Selectmen
03/14/18, 03/21/18

LEGAL NOTICE
MORTGAGEE'S SALE OF
REAL ESTATE

By virtue of and in execution of the Power of Sale contained in a certain mortgage given by Richard F. Daniels, Jr. and Dawn L. Daniels to Mortgage Electronic Registration Systems, Inc. acting solely as a nominee for Clearpoint Funding, Inc., dated November 24, 2009 and recorded in Berkshire County (Northern District) Registry of Deeds in Book 1394, Page 80 (the "Mortgage") of which mortgage Nationstar Mortgage LLC d/b/a Mr. Cooper is the present holder by assignment from Mortgage Electronic Registration Systems, Inc., as nominee for Clearpoint Funding, Inc., its successors and assigns to Nationstar Mortgage LLC dated June 5, 2015 recorded in Berkshire County (Northern District) Registry of Deeds in Book 1568, Page 273, for breach of conditions of said mortgage and for the purpose of foreclosing the same, the mortgaged premises located at 130 Henderson Road, Williamstown, MA 01267 will be sold at a Public Auction at 12:00 PM on April 11, 2018, at the mortgaged premises, more particularly described below, all and singular the premises described in said mortgage, to wit:

Beginning at a point in the southerly line of said Henderson Road at the northwest corner of the premises herein described and conveyed, said point also marking the northeasterly corner of land conveyed by deed of Helen Guertin Keens to Ralph D. McLain et ux dated February 16, 1962 and recorded in the Northern Berkshire Registry of Deeds in Book 567, Page 36;

Thence southerly along the easterly line of land conveyed to said McLain et ux 84 feet, more or less, to the southeasterly corner thereof;

Thence North 87° East 108 feet, more or less, to the southwesterly corner of land conveyed by deed of Helen Guertin Keens to Fremont A. Whitney, Jr. et ux dated June 2, 1954 and recorded in the said Registry of Deeds in Book 506, Page 258;

Thence northerly along the westerly line of land conveyed to said Whitney et ux 111 feet, more or less, to a point in the southerly line of said Henderson Road;

Thence southwesterly along the southerly line of said Henderson Road to the point and place of beginning.

Reference is hereby made to a plan on file in the said Registry of Deeds in Binder 1, Plan 137, entitled "Plan of Land in Williamstown, Mass. To be conveyed by Mario Maino to Helen Guertin" dated May 1944 and prepared by A.B. Wright, C.E.

Together with the water right and easement set forth in deed of Mario Maino to Helen Guertin dated June 2, 1944 and recorded in the said Registry of Deeds in Book 426, Page 582.

Excepting, however from said premises the parcel taken by the Town of Williamstown for highway purposes by instrument dated March 18, 1965 and recorded in the said Registry of Deeds in Book 592, page
141.

Meaning and intending to convey and hereby expressly conveying, all and singular, the same premises conveyed to the grantor herein by deed of Rachel S. Bettis dated January 27, 1989 and recorded with the Berkshire Northern District Registry of Deeds in Book 798, Page 462.

For mortgagor's title see deed recorded with the Berkshire County (Northern District) Registry of Deeds in Book 854, Page 463.

The premises will be sold subject to any and all unpaid taxes and other municipal assessments and liens, and subject to prior liens or other enforceable encumbrances of record entitled to precedence over this mortgage, and subject to and with the benefit of all easements, restrictions, reservations and conditions of record and subject to all tenancies and/or rights of parties in possession.

Terms of the Sale: Cash, cashier's or certified check in the sum of $5,000.00 as a deposit must be shown at the time and place of the sale in order to qualify as a bidder (the mortgage holder and its designee(s) are exempt from this requirement); high bidder to sign written Memorandum of Sale upon acceptance of bid; balance of purchase price payable in cash or by certified check in thirty (30) days from the date of the sale at the offices of mortgagee's attorney, Korde & Associates, P.C., 900 Chelmsford Street, Suite 3102, Lowell, MA 01851 or such other time as may be designated by mortgagee. The description for the premises contained in said mortgage shall control in the event of a typographical error in this publication.

Other terms to be announced at the sale.

Nationstar Mortgage LLC
d/b/a Mr. Cooper
Korde & Associates, P.C.
900 Chelmsford Street
Suite 3102
Lowell, MA 01851
(978) 256-1500
Daniels, Richard F. Jr., 17-029141
03/07/18, 03/14/18, 03/21/18

LEGAL NOTICE
RICHMOND
CONSOLIDATED SCHOOL
BUDGET PUBLIC HEARING

In accordance with Chapter 71, Section 38N of the General Laws of the Commonwealth of Massachusetts, the citizens of the town of Richmond are hereby notified that a Public Hearing will be held on **Wednesday, March 21, 2018 at 5:30 p.m. at the Richmond Consolidated School Cafeteria, 1831 State Highway, Richmond Massachusetts** for the purpose of giving all interested persons the opportunity to be heard for or against the whole or any part of the proposed 2018-2019 Richmond Consolidated School Budget. The Superintendent of Schools shall have available for public viewing, one copy of the proposed 2018-2019 Budget for the forty-eight hour period prior to the March 21, 2018 Public Hearing, at the Superintendent's Office, 1831 State Highway Richmond, MA 01254.

Dewey Wyatt, Chairman,
Richmond
Consolidated School Committee
03/14/18

NOTICE OF COMMUNITY
OUTREACH MEETING
REGARDING ADULT-USE
MARIJUANA ESTABLISHMENT
SILVER THERAPEUTICS, INC.
238 MAIN STREET,
WILLIAMSTOWN,
MASSACHUSETTS

Notice is hereby given that Silver Therapeutics, Inc. will host a Community Outreach Meeting on the following matter on **March 24, 2018 at the Williams Inn, 1090 Main St, Williamstown, MA 01267 at 10:00 A.M:** Silver Therapeutics, Inc. intends to apply for an Adult-use Marijuana Establishment license to operate a marijuana retail dispensary at 238 Main Street, Williamstown, MA 01267 pursuant to M.G.L. Ch. 94G and Chapter 55 of the Acts of 2017, other applicable laws and regulations promulgated thereunder, including those promulgated thereunder by the Massachusetts Cannabis Control Commission.

Information presented by Silver Therapeutics, Inc. at the community outreach meeting will include, but not be limited to:

1. The type(s) of Adult-use Marijuana Establishment to be located at the proposed address;

2. Information adequate to demonstrate that the Adult-use Marijuana Establishment location will be maintained securely;

3. Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;

4. A plan by the Marijuana Establishment to positively impact the community; and

5. Information adequate to demonstrate that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, glare, or other conditions likely to cause nuisance.

Community members will be permitted and are encouraged to ask questions and receive answers from representatives of Silver Therapeutics, Inc. A copy of this notice is on file with the Town Clerk, located at the Williamstown Town Hall, 31 North Street, Williamstown MA, and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred feet of the property line of the petitioner 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.
03/14/18

NOTICE OF MORTGAGEE'S SALE
OF REAL ESTATE

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Laura Jean S. Rozbora and Anton G. Rozbora to Mortgage Electronic Registration Systems, Inc., as nominee for Webster Bank, dated April 7, 2003 and recorded with the Berkshire County (Middle District) Registry of Deeds at Book 2519, Page 82, of which mortgage the undersigned is the present holder by assignment from Mortgage Electronic Registration Systems, Inc. as nominee for Webster Bank, its successors and assigns to JPMorgan Chase Bank, National Association dated June 18, 2012 and recorded with said Registry on July 6, 2012 at Book 4991, Page 190, for breach of the conditions of said mortgage and for the purpose of foreclosing, the same will be sold at Public Auction at 10:00 a.m. on April 4, 2018, on the mortgaged premises located at 165 HOUSATONIC STREET, LENOX, Berkshire County, Massachusetts, all and singular the premises described in said mortgage,

TO WIT:

Beginning in the Northerly line of Housatonic Street at the Southwesterly corner of land now or

Attachment "B"

NOTICE OF COMMUNITY OUTREACH MEETING
REGARDING ADULT-USE MARIJUANA ESTABLISHMENT
SILVER THERAPEUTICS, INC.
238 MAIN STREET, WILLIAMSTOWN, MASSACHUSETTS

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Attachment "C"

NOTICE OF COMMUNITY OUTREACH MEETING
REGARDING ADULT-USE MARIJUANA ESTABLISHMENT
SILVER THERAPEUTICS, INC.
238 MAIN STREET, WILLIAMSTOWN, MASSACHUSETTS

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Silver Therapeutics, Inc.

Glissman, Daniel

Mon 11/2/2020 9:55 AM

To: 'jhoch@williamstownma.gov' <jhoch@williamstownma.gov>;

Mr. Hoch,

This office represents Silver Therapeutics Inc. ("Silver") in connection with the licensing and permitting of its existing marijuana establishment at 238 Main Street (the "Establishment"). Silver's final license from the Cannabis Control Commission ("CCC") for the Establishment is currently up for renewal.

Pursuant the renewal application requirements set forth by the CCC, we are writing to respectfully request that you provide our office with records of any cost incurred by Williamstown reasonably related to the operation of the Establishment.

Please do not hesitate to contact me directly if you have any comments or questions.

Thank you,
Dan

Daniel Glissman

PRINCE LOBEL

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

617 456 8181 Direct
[dglissman@princelobel.com]dglissman@princelobel.com

Marijuana Establishment Municipal Response Attestation

In accordance with Section 935 CMR 500.103(4)(f) of the Massachusetts Code of Regulations, and in support of the renewal application of Silver Therapeutics Inc. (the "**Applicant**") the undersigned Joshua Silver, Owner and President of the Applicant, hereby confirms and certifies to the Cannabis Control Commission (the "**CCC**") that:

1. On November 2, 2020 counsel for the Applicant submitted a written request to the Applicant's Host Community requesting records of any costs to the municipality reasonably related to the operation of the Applicant's Marijuana Establishment;
2. The Applicant has provided a copy of the request in connection with its renewal application; and
3. As of the date of this attestation, **no response** has been received from the Host Community.

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

Dated as of December 2, 2020

By: _____

Name: Joshua Silver

Joshua Silver, Esq.
89 Court Street
Saratoga Springs, NY 12866
(518) 570-9067
joshuaasilver@gmail.com

April 23, 2018
VIA ONLINE SUMISSION ONLY

Cannabis Control Commission
101 Federal Street, 13th floor
Boston, MA 02110

Applicant:	Silver Therapeutics, Inc.
License Type:	Marijuana Retailer
Location:	238 Main Street, Williamstown, MA
Packet:	Application of Intent – Plan for Positive Impact
Rule:	**935 CMR 500.101(2)(b)(10)**

Dear Commission Staff:

I am the Chief Executive Officer of Silver Therapeutics, Inc. (the "Company"). This letter is submitted in response to the requirement set forth in 935 CMR 500.101(2)(b)(10), which provides:

> *A plan by the Marijuana Establishment to positively impact areas of disproportionate impact, as defined by the Commission.*

RESPONSE: The location of the proposed Marijuana Retailer is not in an area designated by the CCC as having disproportionate impact. Nevertheless, the Company can still have positive impact upon such areas by achieving Leadership Certification as a Social Justice Leader. In that regards, as long as certain financial milestones are met, the Company intends to commit up to 1% of its revenue to the CCC's Social Equity Training and Technical Assistance Fund and will conduct up to 50 hours of educational seminars targeted to residents of areas of disproportionate impact in one or more of the following: marijuana cultivation, marijuana product manufacturing, marijuana retailing, or marijuana business training. The Company will also endeavor to recruit employees from areas of disproportionate impact.

Very Truly Yours,

Joshua Silver, CEO

Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1257453312
Notice Date: April 9, 2018
Case ID: 0-000-461-162

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000016

NORTHWEST REGISTERED AGENT
SILVER THERAPEUTICS, INC.
82 WENDELL AVE
PITTSFIELD MA 01201-7066

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, SILVER THERAPEUTICS, 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) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

Visit 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

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: April 06, 2018

To Whom It May Concern :

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

SILVER THERAPEUTICS, INC.

is a domestic corporation organized on **February 01, 2017**

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 180 section 26 A, for revocation of the charter of said corporation; that the State Secretary has not received notice of dissolution of the corporation pursuant to Massachusetts General Laws, Chapter 180, Section 11, 11A, or 11B; 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.

Secretary of the Commonwealth

Certificate Number: 18040143920

Verify this Certificate at: http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx

Processed by:

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $35.00

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

Special Filing Instructions

Articles of Organization
(General Laws, Chapter 180)

Identification Number: 001258563

ARTICLE I

The exact name of the corporation is:

SILVER THERAPEUTICS, INC.

ARTICLE II

The purpose of the corporation is to engage in the following business activities:

TO PROVIDE NATURAL MEDICAL TREATMENTS TO THE PUBLIC AND FOR ALL SUCH OTHER PURPOSES AS ARE PERMISSIBLE FOR A CORPORATION FORMED UNDER CHAPTER 180 OF THE MASSACHUSETTS GENERAL LAWS. THE CORPORATION IS ORGANIZED EXCLUSIVELY FOR SCIENTIFIC AND EDUCATIONAL PURPOSES WITHIN THE MEANING OF SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE, AS AMENDED.

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

NOT APPLICABLE

ARTICLE IV

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:
(If there are no provisions state "NONE")

NONE.

Notes: The preceding four (4) atricles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the

Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

02/03/2017

ARTICLE VII

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

a. The street address *(post office boxes are not acceptable)* of the principal office of the corporation *in Massachusetts* is:

No. and Street: 82 WENDELL AVE
SUITE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

b. The name, residential street address and post office address of each director and officer of the corporation is as follows:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA 89 COURT STREET SARATOGA SPRINGS, NY 12866 USA	01/29/2017
TREASURER	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA 89 COURT STREET SARATOGA SPRINGS, NY 12866 USA	01/29/2017
VICE PRESIDENT	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA 89 COURT STREET SARATOGA SPRINGS, NY 12866 USA	01/29/2017
CLERK	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA 89 COURT STREET SARATOGA SPRINGS, NY 12866 USA	01/29/2017
DIRECTOR	JOSHUA SILVER	89 COURT STREET SARATOGA SPRINGS, NY 12866 USA 89 COURT STREET SARATOGA SPRINGS, NY 12866 USA	01/29/2017

c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:
January

d. The name and business address of the resident agent, if any, of the business entity is:

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

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years.
I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

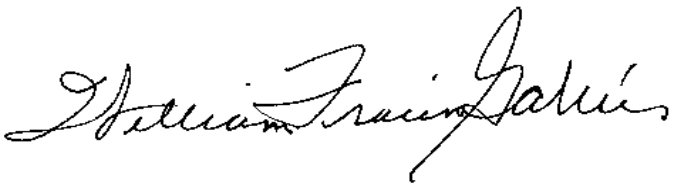
IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 1 Day of February, 2017. *(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 89 COURT STREET SARATOGA SPRINGS, NY 12866

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:

February 01, 2017 10:08 AM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BY LAWS

SILVER THERAPEUTICS, INC.

Article 1. General Provisions

Section 1.1. Name. The name of this Non-profit Corporation is Silver Therapeutics, Inc. and shall herein be referred to as the "Non-profit" or the "Corporation."

Section 1.2. Offices. The principal business office of the Corporation shall be at 82 Wendell Ave., Pittsfield, MA 01201. The Corporation may also have offices at such other places as the Corporation may require.

Section 1.3. Corporate Seal. The seal of the Corporation shall be circular in form with the name of the Corporation around the periphery and the year and state of incorporation within or such other form as the Directors may determine.

Section 1.4. Fiscal Year. The fiscal year of the Corporation shall begin on January 1 and end on the following December31 of each year.

Section 1.5. Members. The Corporation shall have no members. Any action or vote required or permitted by law shall be taken by action or vote of the Directors on the Board of Directors. The Corporation shall have the ability to change its structure to allow for members if approved by a majority vote of the Board of Directors. In such event, the Directors will vote to determine the identity of the Members and new corporate Bylaws will be implemented to govern the Corporation's new structure.

Section 1.6. Governing Instruments. The Corporation shall be governed by its Articles of Incorporation and its Bylaws.

Section 1.7. Nondiscrimination Policy, The Corporation will not practice or permit any unlawful discrimination on the basis of sex, age, race, color, national origin, religion, physical handicap or disability, or any other basis prohibited by law.

Section 1.8. Limitations on Activities. No part of the activities of the Corporation shall consist of participating in, or intervening in, any political campaign on behalf of or in opposition to any candidate for public office, nor shall the Corporation operate a social club or carry on business with the general public in a manner similar to an organization operated for profit. Notwithstanding any other provision of these Bylaws, the Corporation shall not carry on any activity not permitted to be carried on by a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, or the corresponding provisions of any future federal tax law.

Article 2. Charitable. Educational, and Scientific Purposes and Powers.

The purposes of the Corporation, as set forth in the Articles of Incorporation, are exclusively charitable, educational, or religious, within the meaning of section 5Ol(cX3) of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any future Federal tax law ("Section 501(c)(3)"). In furtherance of such purposes, the Corporation shall have the same powers as an individual to do all things necessary or convenient to carry out the purposes, as set forth in the Articles of Incorporation and these Bylaws. The additional purposes of the Non-Profit Corporation are to provide patients with knowledgeable, dedicated, compassionate herbal medicine expertise and high quality medicine as permitted by law. The non-profit may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being legal for a non-profit formed under Section 180 of the General Laws of Massachusetts.

Article 3. Board of Directors

Section 3.1. Powers. The affairs of the Corporation shall be managed by the Directors who may exercise all the powers of the Corporation.

Section 3.2. Number and Election. The Corporation shall have an initial Board of two (2) Directors. A vacancy in the office of Director shall be filled as provided in Section 6.3 below. Additional Directors, who shall serve for a term of one (I) or two (2) years. as determined by the Board at the time of appointment, may be appointed if approved by a majority vote of the Board of Directors. The Board shall appoint a minimum of three (3) additional Directors within the next year. At no point can the number of Directors exceed nine (9) Directors.

Section 3.3. Duties. It shall be the duty of the Directors to:

a) Perform any and all duties imposed on them collectively or individually by law, by the Articles of Organization, or by these Bylaws;
b) Appoint and remove, employ and discharge, and, except as otherwise provided in these Bylaws, prescribe the duties and fix the compensation. if any, of all Officers, agents, and employees of the Corporation;
c) Hire, remove and supervise all Officers, agents, and employees of the Corporation to assure that their duties are performed properly;
d) Meet at such times and places as required by these Bylaws;
e) Register their addresses with the secretary of the Corporation, and notices of meetings by mail, fax, email, telephone or word of mouth to them at such addresses shall be valid notices thereof.

Section 3.4. Committees. The Directors may elect or appoint one or more committees and may delegate to any such committee or committees any or all of their powers, provided that any committee to which the powers of the Directors are delegated shall consist solely of Directors. Unless the Directors otherwise determine; committees shall conduct their affairs in the same manner as is provided in these Bylaws for the Directors. The members of any committee shall remain in office at the pleasure of the Directors.

Section 3.5. Annual Meeting. The Board of Directors shall hold annual meetings each year and may select the time and place for the annual meeting and other meetings of the Board. Other

meetings of the Board of Directors may be called by the President or an Officer designated by the Board. In the event that no date for the annual meeting is established or such meeting has not been held on the date so determined, a special meeting in lieu of the annual meeting may be held with all of the force and effect of an annual meeting.

Section 3.6. Regular and Special Meetings. Regular meetings of the Directors may be held at such places and at such times as the Directors may determine. Special meetings of the Directors may be held at any time and at any place when called by the Chairman of the Board of Directors, if any, the President or a majority of the Directors.

Section 3.7. Notice of Meetings. Forty-eight hours notice by mail, fax, email, telephone or word of mouth shall be given for an annual or special meeting unless shorter notice is adequate under the circumstances. No notice need be given for a regular meeting. Whenever notice of a meeting is required, such notice need not be given to any Director if a written waiver of notice, executed before or after the meeting, is filed with the records of the meeting, or to any Director who attends the meeting without protesting prior thereto or at its commencement the lack of notice to such Director. Neither such notice nor waiver of notice need specify the purposes of the meeting, unless otherwise required by law, the Articles of Organization or the Bylaws.

Section 3.8. Quorum. A majority of the Directors in person or by proxy shall constitute a quorum, but a smaller number may adjourn from time to time without further notice until a quorum is present.

Section 3.9. Action by Vote. When a quorum is present at any meeting, a majority of the Directors present and voting shall decide any question, including election of Officers, unless otherwise provided by law, the Articles of Organization or the Bylaws.

Section 3.10. Action by Writing, Any action required or permitted to be taken at any meeting of the Directors may be taken without a meeting if all the Directors consent to the action in writing and the written consents arc filed with the records of the meetings of the Directors. Such consents shall be treated for all purposes as a vote at a meeting.

Section 3.11. Presence through Communications Equipment. Unless otherwise provided by law or the Articles of Organization, Directors may participate in a meeting of the Board of Directors by means of a conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

Section 3.12. Vote of Interested Directors. A Director who is a member, stockholder, trustee, Director, Officer or employee of any firm, Corporation or association with which the Corporation contemplates contracting or transacting business, or individually proposing doing business with the Corporation, shall disclose his or her relationship or interest to the other Directors acting upon or in reference to such contract or transaction. No Director so interested shall vote on such contract or transaction, but he or she may be counted for purpose of determining a quorum. The affirmative vote of a majority of the disinterested Directors

shall be required before the Corporation may enter into such contract or transaction. In the event that the Corporation enters into a contract or transacts business with any firm, Corporation or association of which one or more of its Directors is a member, stockholder, trustee, Director, Officer, or employee, such contract or transaction shall not be invalidated or in any way affected by the fact that such trustee or Directors have or may have interests therein which are or might be averse to the interests of the Corporation. No trustee or Directors having disclosed such adverse interest shall be Liable to the Corporation or to any creditor of the Corporation or to any other person for any loss incurred by it under or by reason of any such contract or transaction, nor shall any such trustee or Directors be accountable for any gains or profits to be realized thereon.

This section may be defined further in a Conflict of Interest Policy adopted by the Board of Directors and incorporated herein.

Section 3.13. Director's Inspection Rights. Every Director shall have the absolute right at any reasonable time to inspect and copy all books, records, and documents of every kind and to inspect the physical properties of the Corporation, and shall have such other rights to inspect the books, records, and properties of the Corporation as may be required under the Articles of Organization, other provisions of these Bylaws, and provisions of law.

Section 3.14. Periodic Report. The Board shall cause any annual or periodic report of this Corporation, required under law to be prepared and delivered to a Massachusetts agency office, to be so prepared and delivered within the time limits set by law.

Article 4. Officers, Agents, Executive Management Team

Section 4.1. Number and Qualification. The Officers of the Corporation shall be a President, Executive Vice President, Treasurer, Clerk and such other Officers, if any, as the Directors may determine. An Officer may but need not be a Director. The Clerk shall be a resident of Massachusetts unless the Corporation has a resident agent duly appointed for the purpose of service of process. A person may hold more than one office at the same time.

Section 4.2. Election. The initial Officers shall be those persons named as Officers in the Articles of Organization as amended by the first Certificate of Change of Directors or Officers of Non-Profit Corporations filed with the Office of the Massachusetts Secretary of State. The Directors at their annual meeting shall elect a President, Executive Vice President, Treasurer and Clerk, whenever the terms of such Officers have become vacant, who shall hold office until their respective successors are elected and qualified. The Directors also may at any time elect such other Officers as they shall determine. Officers may be removed from their respective offices with or without cause by vote of a majority of the Directors then in office, except as noted in Sections 4.3, 4.4, 4.5, and 4.6 of these Bylaws.

Section 4.3. President. The President shall preside at all meetings of the Board of Directors. The President, or other proper Officer or agent of the Nonprofit authorized by the Board of Directors, may sign any deeds, mortgages, bonds, contracts, or other instruments which the

Board of Directors has authorized to be executed. The President shall perform all duties incident to the office of President and such other duties as may be prescribed by the Board of Directors from time to time. The President will hold office for an indefinite term. Only upon the President's resignation or removal pursuant to Section 6 of these Bylaws will the Board of Directors hold a meeting to appoint the succeeding President. The candidate selected to succeed as President must be approved by a majority vote of the Board of Directors.

Section 4.4. Executive Vice President. The Executive Vice President shall preside at all meetings of the Board should the President be unable to preside, and will perform other duties as assigned by the Board or the President, The Executive Vice President will hold office for an indefinite term. Only upon the Executive Vice President's resignation or removal pursuant to Section *6* of these Bylaws will the Board of Directors hold a meeting to appoint the succeeding Executive Vice President. The candidate selected to succeed as Executive Vice President must be approved by a majority vote of the shareholders.

Section 43. Treasurer. The Treasurer, or other proper Officer or agent of the Non-profit authorized by the Board of Directors, shall have charge and custody of and be responsible for all funds and securities of the Non-profit; receive and give receipt for moneys due and payable to the Non-profit from any source whatsoever, and deposit all such moneys in the name of the Non-profit in such banks, trust companies, or other depositories as shall be selected by the Board of Directors; and in general perform all of the duties incident to the office of Treasurer and such others as may from time to time be assigned by the Board of Directors. The Treasurer will hold office for an indefinite term. Only upon the Treasurer's resignation or removal pursuant to Section 6 of these Bylaws will the Board of Directors hold a meeting to appoint the succeeding Treasurer. The candidate selected to succeed as Treasurer must be approved by a majority vote of the Board of Directors.

Section 4.6. Clerk The Clerk shall keep the minutes of the meetings of the Board of Directors in one or more books provided for that purpose; ensure that all notices are given in accordance with the provisions of these by laws; be custodian of the corporate records; and in general perform all such duties as may from time to time be assigned by the Board of Directors. The Clerk will hold office indefinitely. Only upon the Clerk's resignation or removal pursuant to Section 6 of these Bylaws will the Board of Directors hold a meeting to appoint the succeeding Clerk. The candidate selected to succeed as Clerk must be approved by a majority vote of the Board of Directors.

Section 4.7. Other Officers. Other Officers shall have such duties and powers as may be designated from time to time by the Directors.

Section 4.8. Executive Management Team. The Non-profit will have an executive management team (the "EMT") initially comprised of a Chief Executive Officer (CEO), a Chief Operating Officer (COO) and a Chief Financial Officer (CFO). The initial members of the EMT will be determined by the Board of Directors. The Board of Directors will have the ability to add additional members to the executive management team, from time to time, as they deem fit. Any decision to add additional members to the executive management team must be done through a majority vote of the Board of Directors.

Article 5.
Sponsors. Benefactors, Contributors, Advisors, Friends of the Corporation.

Without conferring or recognizing any legal authority, the Directors may designate persons or groups of persons as sponsors, benefactors, contributors, advisors or mends of the Corporation or similar title. Such persons shall serve in an honorary capacity and, except as the Directors shall otherwise designate, shall in such capacity have no right to notice of or to vote at any meeting, shall not be considered for purposcs of establishing a quorum and shall have no other rights or responsibilities.

Article 6. Resignation, Removal and Vacancies

Section 6.1. Resignation. Any Director or Officer may resign at any time by delivering his resignation in writing to the Chairman of the Board, if any, the President or the Clerk or to the Corporation at its principal office. Such resignation shall be effective upon receipt unless specified to be effective at some other time.

Section 6.2. Removal. Any Director, Officer and the Chief Executive Officer of the Executive Management Team may only be removed for cause, by a vote of a majority of the entire Board of Directors at any meeting of the Board of Directors. No Officer or Director or member of the executive management team shall be removed from office unless the notice of the meeting at which removal is to be considered states such purpose and opportunity to be heard at such meeting is given to the Officer, Director or member of the executive management team whose removal is sought. Notwithstanding the notice provision of Section 3.7 above, written notice shall be delivered to all Directors a; least fourteen (14) days in advance of a meeting at which removal is sought. For the purpose of this Section "Cause" shall mean if any Director, Officer or member of the executive management team: (I) fails to qualify as a dispensary agent as determined by the Massachusetts Department of Public Health ("DPH"); (2) is found unsuitable or unqualified to sit as Director or Officer of a registered marijuana dispensary as determined by DPH pursuant to written notice to the Non-profit; or (3) engages in any negligent, reckless, or intentional action or inaction that causes substantial financial or reputational injury to the Non-profit, or jeopardizes the Non-profits ability to receive or renew a marijuana dispensary registration, as determined in a written opinion of the Non-profit's legal counsel.

Section 6.3. Vacancies. Any vacancy on the Board of Directors may be filled by vote of a majority of the Directors then in office. The Directors may exercise all their powers notwithstanding the existence of one or more vacancies on the Board. Vacancies in any office may be filled by the Directors.

Article 7. Indemnification

Section 7.1. Indemnification. The Corporation shall, to the extent legally permissible, 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 or Officer of, or in a similar capacity with, another organization or an employee benefit plan, against all expenses and liabilities (including counsel fees, judgments, fines, excise taxes, penalties and amounts payable in settlements) reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or other proceeding, whether civil, criminal, administrative or investigative, in which such person may become involved by reason of serving or having served in such capacity (other than a proceeding voluntarily initiated by such person unless he or she is successful on the merits, the proceeding was authorized by the Corporation or the proceeding seeks a declaratory judgment regarding his or her own conduct); provided that no indemnification shall be provided for any such person with respect to any matter as to which he or she shall have been finally adjudicated in any proceeding not to have acted in good faith in the reasonable belief that his or her action was in the best interests of the Corporation or, to the extent such matter relates to service with respect to any employee benefit plan, in the best interests of the participants or beneficiaries of such employee benefit plan; and provided, further, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, the payment and indemnification thereof have been approved by the Corporation, which approval shall not unreasonably be withheld, or by a court of competent jurisdiction. Such indemnification shall include payment by the Corporation of expenses incurred in defending a civil or criminal action or proceeding in advance of the final disposition of such action or proceeding, upon receipt of an undertaking by the person indemnified to repay such payment if he or she shall be adjudicated to be not entitled to indemnification under this section, which undertaking may be accepted without regard to the financial ability of such person to make repayment.

A person entitled to indemnification hereunder whose duties include service or responsibilities as a fiduciary with respect to a subsidiary or other organization shall be deemed to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation if he acted in good faith in the reasonable belief that his action was in the best interests of such subsidiary or organization or of the participants or beneficiaries of, or other persons with interests in, such subsidiary or organization to whom he had a fiduciary duty.

Where indemnification hereunder requires authorization or approval by the Corporation, such authorization or approval shall be conclusively deemed to have been obtained, and in any case where a Director of the Corporation approves the payment of indemnification, such Director shall be wholly protected, if:

(i) The payment has been approved or ratified

(1) By a majority vote of a quorum of the Directors consisting of persons who are not at that time parties to the proceeding, or

(2) By a majority vote of a committee of one or more Directors who are

not at that time parties to the proceeding and are selected for this purpose by the fulll Board (in which selection Directors who are parties may participate); or

(ii) The action is taken in reliance upon the opinion of independent legal counsel (who may be counsel to the Corporation) appointed for the purpose by vote of the Directors or in the manner specified in clauses (I) or(2) of subparagraph (i); or

(iii) The payment is approved by a court of competent jurisdiction; or (iv) The Directors have otherwise acted in accordance with the applicable legal standard of conduct. Any indemnification or advance of expenses under this section shall be paid promptly, and in any event within 30 days, after the receipt by the Corporation of a written request therefor from the person to be indemnified, unless with respect to a claim for indemnification the Corporation shall have determined that the person is not entitled to indemnification. If the Corporation denies the request or if payment is not made within such 30-day period, the person seeking to be indemnified may at any time thereafter seek to enforce his or her rights hereunder in a court of competent jurisdiction and, if successful in whole or in part, he or she shall be entitled also to indemnification for the expenses of prosecuting such action. Unless otherwise provided by law, the burden or proving that the person is not entitled to indemnification shall be on the Corporation.

The right of indemnification under this section shall be a contract right inuring to the benefit of the Directors, Directors, Officers and other persons entitled to be indemnified hereunder and no amendment or repeal of this section shall adversely affect any right of such trustee, Director, Officer or other person existing at the time of such amendment or repeal.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a trustee, Director, Officer or other person entitled to indemnification hereunder. The indemnification provided hereunder may, to the extent authorized by die Corporation, apply to the Directors, Directors, Officers and other persons associated with constituent Corporations that have been merged into or consolidated with the Corporation who would have been entitled to indemnification hereunder had they served in such capacity with or at the request of the Corporation.

The right of indemnification under this section shall be in addition to and not exclusive of all other rights to which such trustee, Director, Officer or other persons may be entitled.

Nothing contained in this section shall affect any rights to indemnification to which Corporation employees or agents, other than Directors, Directors, Officers and other persons entitled to indemnification hereunder, may be entitled by contract or otherwise by law.

Section 7.2. Officers and Directors Insurance.

The Corporation shall obtain and maintain Officers and Directors Liability insurance policy with coverage no less than $1,000,000 per occurrence and $2,000,000 annually in aggregate.

Article 8. Amendment

These Bylaws may be amended or repealed, in whole or in part, by vote of a majority of the Directors then in office at any meeting of the Directors.

Article 9. Execution of Papers

Except as provided by law or in the Articles of Organization or as the Directors may generally or in particular cases authorize the execution thereof in some other manner, all deeds, leases, transfers, contracts, bonds, notes. releases, checks, drafts, and other documents or instruments to be executed on behalf of the Corporation may be signed by the President, or by the Treasurer. Any recordable instrument purporting to affect an interest in real estate, executed in the name of the Corporation by two of its Officers, of whom one is the President and the other of whom is the Treasurer shall be binding on the Corporation in favor of a purchaser or other person relying in good faith on such instrument notwithstanding any inconsistent provisions of the Articles of Organization. these Bylaws, or resolutions or votes of the Corporation.

Article 10. Compensation

Directors shall not receive any salaries for their services on the Board of Directors. Unless otherwise provided by law, the Articles of Organization, or these Bylaws, a Director shall be entitled to receive reimbursement for reasonable travel expenses incurred course of fulfilling their duties to the Corporation. A Director shall not be precluded from serving the Corporation in any other capacity and receiving reasonable compensation for any such services.

Article 11. Deposit

All funds of the Corporation shall be deposited from time to time to the credit of the Corporation in such banks, trust companies, or other depositories as the Board of Directors may select.

Article 12. Construction and Terms

(a)If there is any conflict between the provisions of these Bylaws and the articles of organization of this Corporation, the provisions of the articles of organization shall govern.
(b) Should any of the provisions or portions of these Bylaws be held unenforceable or invalid for any reason, the remaining provisions and portions of these Bylaws shall be unaffected by such holding.
(c) All references in these Bylaws to the articles of organization shall be to the articles of organization, certificate of incorporation, corporate charter, or other founding document of this Corporation filed with an office of Massachusetts Secretary of State and used to establish the legal existence of this Corporation.
(d) All references in these Bylaws to a section or sections of the Internal Revenue Code shalt be to such sections of the Internal Revenue Code of 1986 as amended from time to time, or to

corresponding provisions of any future federal tax code 1986 as amended from time to time, or to corresponding provisions of any future
federal tax code.

Article 13. Policies

The Board of Directors may adopt policies that shall be incorporated into these Bylaws.

As set forth above, these Bylaws were duly adopted at a meeting of the Board of Directors of Silver Therapeutics, Inc. on July 2, 2017.

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Joshua Silver
Clerk

Separating Recreational from Medical Operations

Currently, Silver Therapeutics, Inc. (the "**Company**") is only operating as a Marijuana Retailer at this location. However, it holds a provisional license as an MTC and has received local approvals to distribute Medical Marijuana Products from this location and operate as a co-located Medical and Adult Use Marijuana Establishment.

Upon receipt of its final license to operate the facility as a co-located Medical Marijuana Treatment Center and Marijuana Establishment the Company shall put the following policies and procedures regarding separating recreational from medical operations into effect:

Marijuana and marijuana products for medical use shall only be sold to registered qualifying patients and personal caregivers. The Company shall refuse to sell marijuana to any registered qualifying patient or personal caregiver who is unable to produce a registration card and valid proof of identification, or who does not have a valid certification. 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.

If an individual is younger than 21 years old, but 18 years of age or older, he or she shall not be admitted unless they produce an active patient registration card issued by the DPH or the Commission; and if the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active patient registration card and they are accompanied by a Personal Caregiver (as defined in 935 CMR 501.002) with an active patient registration card. In addition to the patient registration card, registered qualifying patients 18 years of age and older and Personal Caregivers must also produce proof of identification. A patient registration card is not sufficient proof of age.

The Company shall physically separate medical and adult-use sales areas. Subject to final approval by the Commission, such separation shall be provided by a temporary or semi-permanent physical barrier, such as a stanchion, that adequately separates sales areas of marijuana or marijuana products for medical use from sales areas of marijuana or marijuana products for adult use for the purpose of patient confidentiality.

The Company shall provide for separate lines for sales of marijuana or marijuana products for medical use from marijuana or marijuana products for adult use within the sales area, provided, however, that the holder of a medical registration card shall be permitted to use either line and shall not be limited only to the medical use line so long as compliance with 935 CMR 501.105(5)(d) can be maintained.

The Company shall adopt separate accounting practices at the point-of-sale for medical and adult-use sales and implement procedures for virtual, i.e. electronic, separation of medical and adult use

marijuana and marijuana products, which procedures shall be subject to the Commission's approvals, but may include the use of plant or package tags in the seed-to-sale tracking system.

The Company shall additionally provide a patient consultation area, an area that is separate from the sales floor to allow for confidential visual and auditory consultation with qualifying patients. Such consultation area shall have signage stating "Consultation Area", be separate from the sales area, and accessible by a qualifying patient or caregiver without having to traverse a limited access area.

The Company shall also use best efforts to prioritize patient and caregiver identification verification and physical entry into its retail area.

This policy may also be referred to by the Company as the "**Policy for Separating Recreational from Medical Operations**".

Restricting Access to Age 21 and Older

Silver Therapeutics, 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.

Currently, the Company is only operating as a Marijuana Retailer at this location. However, it holds a provisional license as an MTC and has received local approvals to distribute Medical Marijuana Products from this location and operate as a co-located Medical and Adult Use Marijuana Establishment.

Should the Company ultimately receive a final license to operate the facility as a co-located Medical Marijuana Treatment Center and Marijuana Establishment, then it shall be a policy of the Company that marijuana and marijuana products for medical use shall only be sold to registered qualifying patients and personal caregivers. The Company shall refuse to sell marijuana to any registered qualifying patient or personal caregiver who is unable to produce a registration card and valid proof of identification, or who does not have a valid certification. 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.

If the Company is licensed for the sale of medical marijuana, then it shall be a policy of the Company that: (1) if an individual is younger than 21 years old, but 18 years of age or older, he or she shall not be admitted unless they produce an active patient registration card issued by the DPH or the Commission; and (2) if the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active patient registration card and they are accompanied by a

Personal Caregiver (as defined in 935 CMR 501.002) with an active patient registration card. In addition to the patient registration card, registered qualifying patients 18 years of age and older and Personal Caregivers must also produce proof of identification. A patient registration card is not sufficient proof of age.

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

Quality Control and Testing for Contaminants

Testing of Marijuana

Silver Therapeutics, 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 Medical Marijuana Products and Marijuana-infused Products*. 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.

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.

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 CMR500.150(4)(a) shall be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Marijuana and Marijuana Products submitted for retesting prior to remediation must be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation

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 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 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 must 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**".

Personnel Policies Including Background Checks

Silver Therapeutics, 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*.

(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;

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 notifying 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.

(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;

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
- Up to five (5) Security Officers.

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

Record Keeping Procedures

Silver Therapeutics, 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 tracking 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 and eight (8) hour related duty training.

c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions (as applicable);

d. Personnel policies and procedures; 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 enforcement 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 enforcement 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**".

Maintaining of Financial Records

Silver Therapeutics, 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

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

Diversity Plan

I. GOALS

It shall be the policy of the Company to promote equity among minorities, women; veterans; people with disabilities; and people of all gender identities and sexual orientations in the operations of the Marijuana Establishment by (a) increasing the number of such individuals who achieve their goal of entering the adult-use marijuana industry and (b) insuring that such employees are retained by providing the tools and corporate infrastructure to ensure their success.

II. PROGRAMS

The Company will recruit a diverse workforce by strengthening and developing relationships with minorities, women; veterans; people with disabilities; and people of all gender identities and sexual orientations by holding job fairs and advertising job openings in Greenfield and Amherst, which are cities near to the location of the Marijuana Establishment that have the largest and most diverse populations. The Company will post job advertisements in the Greenfield Recorder and the Amherst Bulletin, and in the Western Massachusetts Craigslist Board. The advertisements shall state that minorities, women; veterans; people with disabilities; and people of all gender identities and sexual orientations shall be encouraged to apply.

The Company will review and modify recruitment strategies for identifying and attending minority and women job fairs on an on-going basis. Job vacancies will only be filled after being publicly posted. The Company will avoid relying upon existing employee referrals, which often result in "like me" referrals, where employees refer candidates of the same race, religion, national origin or other class.

When the company is considering hiring outside companies, the Company shall have a preference to hire companies that are listed on State's Directory found at https://www.sdo.osd.state.ma.us/BusinessDirectory/BusinessDirectory.aspx as a Minority Business Enterprise (MBE), Women Business Enterprise (WBE), Lesbian Gay Bisexual Transgender Enterprise (LGBTBE), Service-Disabled Veteran-Owned Business Enterprise (SDVOBE) or a Disability-Owned Business Enterprises (DOBE) (collectively a Disadvantaged Business Enterprise).

The Company will adopt a formalized and written anti-discrimination and harassment policy which clearly advises all employees and managers that any illegal discrimination or harassment will not be tolerated. Examples of such behavior include derogatory comments based on racial or ethnic characteristics and sexual advances. Executive and Management staff will be trained on how to recognize racial and gender bias at the workplace. The Company has identified Compliance Training Group, a division of Employers Choice Online Inc., that specializes in Human Resources and workplace compliance training services and products for executives, supervisors, and employees as its vendor of diversity training programming. The Company will

require all executives and managers to complete the management diversity training course. The Company will require all staff to complete Compliance Training Groups employee diversity training course. The training courses shall identify and provide understanding of the benefits and challenges of workplace diversity, the importance of sensitivity and inclusion, and the legal basis for providing an equal-opportunity workplace.

In the event that this Diversity Plan is revised in the future to require a donation to an organization, the Company shall first contact such organization to confirm that it can receive the donation or may otherwise work with the Company in the furtherance of its goals.
With respect to any notices published, the Company 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.

Any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to the limitations on ownership or control or other applicable laws.

III. MEASUREMENTS

The Company shall immediately begin to collect all data described in this Plan. In particular, the Company shall create a record containing the following information:

1. Number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
2. Number of promotions for people falling into the above-listed demographics since initial licensure;
   Number of positions created since initial licensure;
3. Number of and type of information sessions held or participated in with supporting documentation;
   Number of postings in diverse publications or general publications with supporting documentation;
4. Number and subject matter of trainings held and the number of individuals falling into the above-listed demographics in attendance; and
5. Number of Disadvantage Business Enterprises that the Company has hired.

On the date that is six (6) months from the date that operations have commenced, and again on each and every six (6) month period thereafter, the Company shall review all data collected pursuant to this **Diversity Plan** and create a report thereof. These biannual reports will be reviewed and utilized by the Company prior to making decision to (a) post an advertisement for a job opening, (b) hire an employee and (c) host a job fair. If after two years, the data collected reveals that the goals stated in this plan are not being met, the Company shall adopt new policies that are tailored to meet such goals. Such reports will also be used to demonstrate proof of success or progress upon the yearly renewal of the Company's Marijuana Establishment License.

Employee Qualifications and Training

Silver Therapeutics, Inc. (the "**Company**") shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum shall include a three (3) hour Responsible Vendor Program under 935 CMR 500.105(2)(b). 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. The Company shall appoint an inventory manager who shall be responsible for compliance with seed-to-sale SOR tracking and shall complete, among other things, advanced training offered by METRC. It shall be a policy of the Company that all marijuana agents and staff shall receive and participate in, a minimum of, eight (8) hours of on-going training annually.

Company Training Policies shall be as follows:

1. All owners, managers and employees of the Company 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 attend and successfully complete a responsible vendor training program.

2. 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 a responsible vendor training program within ninety (90) days of hire.

3. 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."

4. Administrative employees who do not handle or sell marijuana may take the responsible vendor training program on a voluntary basis.

5. The Company shall maintain records of responsible vendor training program compliance 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.

6. Management level employees shall be trained with respect to proper disposal methods including composting procedures (as such procedures are set forth in the Company's Storage Policy, which policy shall be incorporated herein by reference) and shall be instructed to complete inventory audits pursuant to the Company's Inventory Policy, which policy shall be incorporated herein by reference.

The Company shall ensure that such responsible vendor training programs core curriculum include the following:

(a) Discussion concerning marijuana's effect on the human body. Training shall include:

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 false identification;

c. Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission;

d. Provisions for confiscating fraudulent identifications; and

e. Common mistakes made in verification.

(e) Other key state laws and rules affecting owners, managers, and employees, which shall include:

a. Local and state licensing and enforcement;

b. Incident and notification requirements;

c. Administrative and criminal liability;

d. License sanctions;

e. Waste disposal;

f. Health and safety standards;

g. Patrons prohibited from bringing marijuana onto licensed premises;

h. Permitted hours of sale;

i. Conduct of the Marijuana Establishment;

j. Permitting inspections by state and local licensing and enforcement authorities;

k. Licensee responsibilities for activities occurring within licensed premises;

l. Maintenance of records;

m. Privacy issues; and

n. Prohibited purchases and practices.

(f) 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**".

Energy Compliance Plan

Silver Therapeutics, 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.

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