

SILVER THERAPEUTICS, INC.
MRN281271

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name of the Marijuana Establishment and its application number:

Silver Therapeutics, Inc.

2. Address of the Marijuana Establishment:

238 Main Street, Williamstown, MA 01267

3. Type of license sought (if cultivation, its tier level and outside/inside operation):

Retailer

4. Applicant is a licensee or applicant for other Marijuana Establishment license(s):

Cultivation, Tier 3/Indoor (10,001 to 20,000 sq. ft.) (application submitted)

5. List of all required individuals and their business roles in the Marijuana Establishment:

Joshua Silver—Executive
Brendan McKee—Executive
Joshua Ferranto—Executive
Michel Evanusa—Close Associate

6. List of all required entities and their roles in the Marijuana Establishment:

There are no other entities, other than the applicant, that appear to have an interest in the Marijuana Establishment.

7. Priority status of applicant:

RMD Priority (RP201854)

8. Location and status of business if it is an RMD:

The RMD is in compliance with the Department of Public Health (DPH).

The RMD business will be co-located with the adult-use business in Williamstown. The RMD has a Provisional Certificate of Registration for dispensing, cultivation, and processing.

9. Information regarding host community agreement certification:

The Host Community Agreement was executed on February 12, 2018; certification provided.

10. Information regarding community outreach meeting:

The community outreach meeting was held on March 24, 2018. Notice was published at least seven days prior in the Berkshire Eagle. The applicant certified notice to the municipality and abutters. The applicant certified compliance with the community outreach meeting requirements.

11. Any objections regarding compliance with local ordinances and bylaws presented by the municipality:

No objections were communicated to the Commission. The Commission received a response from the municipality on July 6, 2018, stating that the applicant was in compliance with all local ordinances and bylaws.

12. Summary of plan to positively impact areas of disproportionate impact:

The applicant plans to do the following:

- a. Commit up to one percent (1%) of its revenue to the Cannabis Control Commission's Social Equity Training and Technical Assistance Fund;
- b. Host education seminars on best business practices; and
- c. Recruit employees from areas of disproportionate impact.

SUITABILITY REVIEW

13. Concerns arising from background checks on individuals associated with the application:

No suitability issues currently exist.

14. Concerns arising from background checks on entities associated with the application:

No concerns.

15. Applicant's disclosure of any past civil or criminal actions:

No disclosures.

16. Applicant's disclosure of any occupational license issues:

No disclosures.

17. Applicant's disclosure of any business interests in other jurisdictions:

Joshua Ferranto disclosed marijuana-related business interests in one company in Maine (Mandala One, LLC).

These disclosures did not raise suitability issues.

18. Status of applicant's compliance with the Department of Revenue and Secretary of the Commonwealth:

April 6, 2018 | Certificate of Good Standing, Secretary of the Commonwealth (Certification Number: 18040143920)

April 9, 2018 | Certificate of Good Standing, Department of Revenue (Letter ID: L1257453312)

MANAGEMENT AND OPERATIONS REVIEW

19. Applicant's proposed timeline to become operational in the adult-use market:

The applicant is an existing RMD and states that it can be operational once given approval from the Commission.

20. Applicant's proposed hours of operation:

Monday-Sunday: 10:00 a.m. to 8:00 p.m.

21. Applicant's compliance with submitting summaries of the following plans, policies and procedures:

- a. Security Plan
- b. Prevention of Diversion Plan
- c. Storage of Marijuana Plan
- d. Transportation Plan
- e. Inventory Procedures
- f. Quality Control and Testing Procedures
- g. Personnel Procedures
- h. Dispensing Procedures
- i. Record-Keeping Procedures
- j. Maintenance of Financial Records Policy
- k. Diversity Plan

The applicant is fully compliant with submitting all summaries. All summaries were determined to be substantially compliant with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable. Full compliance will be reviewed during inspections and will be required before a final license is issued.

22. Summary of diversity plan:

The applicant plans to do the following:

- a. Hire a diverse workforce;
- b. Partner with local organizations and colleges to target individuals for recruitment;

- c. Participate in jobs fairs tailored to minorities and women; and
- c. Adopt a comprehensive strategy to promote diversity among its staff and management.

23. Summary of cultivation plan (if applicable):

Not applicable.

24. Summary of products to be produced and/or sold (if applicable):

Not applicable.

25. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant is a vertically integrated RMD that has also applied for adult-use licenses for cultivation. The applicant plans to obtain marijuana from its affiliated licenses. If the need arises, it will contract with other licensed establishments for additional product.

26. ISO 17025 Certifying Body and Certificate Number (if applicable):

Not applicable.

RECOMMENDATION

Commission staff recommend issuing a provisional license with the following conditions:

- (1) Final license is subject to certification that the applicant remains in compliance with DPH regulations, 105 CMR 725.000;
- (2) Final license is subject to inspection and audit to ascertain compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable;
- (3) Final license is subject to inspection and audit to ascertain that the facilities are compliant with all applicable state and local codes, bylaws, ordinances, and regulations;
- (4) The applicant shall cooperate with and provide information to Commission investigators, agents, and employees upon request;
- (5) Provisional license is subject to the payment of the appropriate license fee pursuant to 935 CMR 500.005; and
- (6) Final license is subject to providing Commission staff with a revised plan to positively impact areas of disproportionate impact.

This recommendation was based on the applicant's demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and upon the evaluation of the thoroughness of the applicant's responses to the required criteria.

Commission staff certify that a due diligence review of the applications was performed. As of this date, the applicant has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Accordingly, the applicant is recommended for provisional licensure with the previously mentioned conditions.