

Melrose — Investigative Briefing Memorandum

PUBLIC RECORDS ANALYSIS · REAL TRUTH MA · RETRIEVED SEPTEMBER 11, 2026

INVESTIGATIVE BRIEFING MEMO

Melrose FOIA Document Analysis — PRR #26-105 August 2026 — Based on the First Six FOIA Batches Received (Through August 25, 2026) Production ongoing; additional batches expected — more to come.

Melrose is the network hub referenced throughout that memo.

FOIA PRODUCTION STATUS

This memorandum is the first Melrose-specific briefing prepared on this FOIA return. It is based on the first six batches of the City of Melrose's rolling response to Public Records Request #26-105, the most recent received August 25, 2026. The consolidated production to date comprises approximately 2,108 files across six deliveries — 1,659 unique documents after duplicate consolidation — spanning roughly October 2023 through November 2025. The City's production remains ongoing; additional batches are expected, and this memo will be supplemented as they arrive. The decisive change is one of completeness. Every prior batch consisted almost entirely of attachments produced without their parent emails; the City had severed the correspondence that gave those attachments their meaning. The August 2026 production finally includes the correspondence itself — hundreds of Maureen Buzby's own emails, with full sender, recipient, date, and subject headers, together with the internal planning documents, quarterly grant reports, and a confidential steering-committee charter that the earlier productions withheld. The result converts what had been a well-supported inference of coordination into a documentary record stated in the participants' own words.

EXECUTIVE SUMMARY

The completed City of Melrose FOIA return confirms, in primary correspondence, what every other municipal return in this investigation suggested: Melrose is the operational hub of the Massachusetts Nicotine-Free Generation (NFG) network. Maureen Buzby, Melrose's Regional Tobacco Prevention Program Coordinator, runs the Mystic Valley Tobacco Prevention Program — a seven-community collaborative (Malden, Medford, Melrose, Reading, Stoneham, Wakefield, Winchester) funded by the state's Massachusetts Tobacco Cessation and Prevention Program (MTCP) — and the records show her personally coordinating NFG adoption in dozens of municipalities far beyond that footprint, and in at least one out-of-state town (Ross, California). The production documents a coordinated apparatus operating across four levels: an academic and legal core (Dr. Jonathan Winickoff of MGH/Harvard; Professor Katharine Silbaugh of Boston University Law; Mark Gottlieb and the Public Health Advocacy Institute at Northeastern; Anthony Ishak of MGH); the state's own tobacco-control bureaucracy (MTCP/DPH, which funds the coordinators, folds NFG into their funded work plans, standardizes their talking points, and tracks adoptions as a program metric); the municipal-association infrastructure (MAHB, MHOA, and the MMA, which co-author the model documents and maintain the official adoption scoreboard); and a national

and global tier (Action on Smoking & Health and a monthly “brain trust” actively courting Bloomberg Philanthropies, the Campaign for Tobacco-Free Kids, and the WHO). The most significant new documents include: a confidential, invitation-only steering-committee concept note styled “Massachusetts Project Sunset,” whose members agree to keep the group's workings secret and need not disclose that their own organizations support its goals; Dr. Winickoff's full “Dear Team” directive instructing the network to customize a template board-of-health letter for each town and to lobby officials “in advance of hearings, and prior to the tobacco industry poisoning the atmosphere”; explicit admissions that hearings were timed and structured to suppress opposition and public input; state

contract-manager comments directing Buzby to keep messaging “consistent” and all funded boards “looped in”; a youth-recruitment “farm team” run through the state-funded 84 program; and an NFG marketing flyer whose designer admits she “made the quote up.” Taken together, the record establishes that the statewide “wave” of local NFG adoptions is a centrally organized, state-financed campaign whose explicit purpose is to manufacture the appearance of grassroots momentum sufficient to compel a statewide law.

KEY DOCUMENT EXCERPTS

The Winickoff “Dear Team” Directive: Customize the Template, Lobby Before the Hearing From: Winickoff, Jonathan P., MD, MPH <JWINICKOFF@mgh.harvard.edu> To: “Dear Team” (NFG task force) Date: Saturday, November 30, 2024, 6:32 PM Subject: Pediatrician letter and NFG fact sheet “I am thankful for our amazing teamwork in spreading NFG across the Commonwealth (and hopefully beyond)... the letter should be customized by naming the city and town prior to submission to each BOH. Where possible, we should continue to meet with city and town officials in advance of hearings, and prior to the tobacco industry poisoning the atmosphere.” SIGNIFICANCE: The network's medical figurehead directs the mass-production of a fill-in-the-town- name pediatrician letter and an explicit program of private, pre-hearing lobbying of officials — the two pillars of an orchestrated campaign. Professor Silbaugh's reply the next day (“those comments were about the FAQ—no comments on the letter other than that it remains fabulous”) documents the MGH–BU editorial loop. The underlying template survives elsewhere in the production as a blank addressed to “Dear XXX Board of Health.” Source: RE Pediatrician letter and NFG fact sheet; template file “Winickoff and Hartman NFG BOH letter 11242024.docx.”

“Massachusetts Project Sunset”: A Confidential, Invitation-Only Steering Committee Document: “MA NFG Committee concept note,” dated July 22, 2025 “The [MASSACHUSETTS PROJECT SUNSET] steering committee ... is an ad hoc group of volunteers ... to advance endgame measures ... in particular Nicotine-Free Generation laws. The Committee will ... organize written and oral testimony before government bodies. ... Membership in the Committee is by invitation only. ... Individual membership in the Committee does not require or indicate that the individual's organization supports the goals of the Committee. ... Members agree to keep confidential the workings of the Committee.” SIGNIFICANCE: A written charter for a covert coordinating body whose function is to manufacture testimony before government bodies, whose membership is concealed, and which expressly contemplates members whose own organizations are not on record supporting its goals. It is the single clearest artifact that the “grassroots” NFG movement is a managed operation. A parallel ASH update in the production separately references “Project Sunset steering committees.” Source: 1_MA NFG Committee concept note_Jul-22-25.docx; corroborated by ASH Updates.

“The Less Time for Opponents to Prepare, the Better” From: Anthony Ishak <aishakpharmd@yahoo.com> To: Katharine Silbaugh and the NFG task force Date: Monday, January 20, 2025 Subject: Re: NFG/Somerville “Ideally earlier if the youth and we are organized. The less time for opponents to prepare, the better... encourage Somerville to use an earlier date... This accelerates momentum in that more places are doing it AND THEY ARE DOING IT FASTER.” SIGNIFICANCE: A core organizer states in writing the strategy of timing public hearings to minimize the opposition's ability to participate — the antithesis of open public process, and direct evidence of a predetermined-outcome mindset. Source: Re NFG/Somerville (“Somerville.pdf”).

Scheduling a Hearing “Without Public Input” From: Ginny Chadwick <ginnychadwick@brandeis.edu> To: Anthony Ishak and the NFG task force Date: Saturday, January 18, 2025 Subject: Re: NFG/Somerville “I don't think it good form to have a public hearing when the public is away (unless you really want to get something through without public input).” SIGNIFICANCE: A network strategist naming the tactic outright. Even as she counsels against holding the Somerville hearing during February school break, she confirms that passing NFG while the public is absent is a live option the group weighs. Source: Re NFG/Somerville.

The “Dream Team” Named to a State Official From: Maureen Buzby <mbuzby@cityofmelrose.org> To: Doris Cullen, Massachusetts Department of Public Health Date: December 20, 2024 Subject: RE: looking for youth (and others) interested in working on the NFG initiative “I think it would be helpful if I share with you the names of some of the ‘Dream Team’, (that's my label for them)... the goal is to have NFG become state law: Mark Gottlieb, Kate Silbaugh, Anthony Ishak, Jonathan Winickoff, Ginny Chadwick, Jeanne MacDonald, Michael Chou, Anthony Chui... the folks who spend countless hours of their own time calling local health directors, attending BOH meetings, testifying at public hearings, developing talking points, producing white papers.” SIGNIFICANCE: The hub coordinator, writing to a state DPH official, self-describes a named, cross- institutional network whose explicit objective is to force a statewide law by accumulating local adoptions — and, in the same message, solicits the state's help recruiting youth advocates.

Source: FW looking for youth (and others) interested in working on the NFG initiative.pdf.

Newton Adopts NFG With “No Public Comment Allowed” From: Maureen Buzby <mbuzby@cityofmelrose.org> To: Chris Banthin (PHAI), Mary Brush (DPH), Cheryl Sbarra (MAHB), Lisa Stevens-Goodnight (MMA), et al. Date: Tuesday, January 21, 2025 Subject: NFG — Newton “Newton City Council just passed NFG 19-4-1... No public comment allowed tonight.” SIGNIFICANCE: The largest municipality to adopt NFG to that point did so at a session where the public was barred from speaking — a fact the coordinator reports approvingly to a distribution list that includes state DPH staff and the PHAI/MAHB/MMA principals. Source: FW NFG — Newton (Boston Globe inquiry).pdf.

Padding the Town Count: Pelham as a “One-Off Orchestrated” Resolution From: Maureen Buzby To: Mary Brush, Massachusetts DPH Date: Wednesday, January 22, 2025 Subject: RE: NFG — Newton “It was a one-off orchestrated by a Belchertown Board member who had a friend on the Board in Pelham. They have no stores so we weren't really paying attention... since they would be included in our town-count.” SIGNIFICANCE: A candid admission that a jurisdiction with zero tobacco retailers was engineered onto the running tally to inflate the “number of towns” metric — the same metric the network uses to argue the legislature should act. Source: FW NFG — Newton.pdf.

Manufacturing a Local Face: “To Buffer Against” the “Outsiders” Criticism From: Maureen Buzby (cc Parivallal Thillaigovindan, Framingham; Doris Cullen, DPH) To: Ed Rand, Health Resources in Action / The 84 Date: Wednesday, April 16, 2025 Subject: Support for NFG in Hopkinton “Tobacco Control advocates will show up to support this important public health policy, but we often get criticized as ‘outsiders’... To buffer against that argument, it is helpful to have as many local community members as we can round up... Does Hopkinton have an 84 Chapter? Or is there a chapter nearby that might be able to provide youth testimony at an upcoming hearing?” SIGNIFICANCE: The hub coordinator admits the campaign is run by outsiders and describes deliberately assembling local-looking testimony, including recruited youth, to disguise that fact — the astroturf mechanism in plain language, cc'd to a state DPH official and a tobacco-control agent from another municipality.

Source: RE / FW Support for NFG in Hopkinton.pdf.

The State Directs the Campaign: MTCP Contract-Manager Comments Document: MTCP contract-manager comment column, FY25 Melrose quarterly report “The Task force and you have been busy. Please make sure to continue to keep all funded BOHs looped in and coordinate efforts with them... Remember to check in with myself and Rachel for talking points for podcasts, presentations, etc. We are here to support and keep messaging consistent... Any plans to add some older youth? Maybe students from Tufts are looking for a side gig?” SIGNIFICANCE: The Commonwealth's own contract manager, reviewing a state-funded deliverable, directs the multi-town campaign — standardizing talking points across boards of health and even suggesting youth recruitment. This is the state steering ostensibly independent local board actions. Buzby elsewhere confirms she must obtain MTCP approval “to speak to the press.” Source: 1_FY25Melrose Reporting.xlsx (contract-manager comments version).

The Academic Survey Repurposed “for Advocacy” From: Matthew Reynolds, MGH (Winickoff research team) <mattrey97@gmail.com> To: The NFG task force Date: Friday, June 13, 2025 Subject: Re: NFG Survey — Town Follow Up “The wording of the IRB protocol states that survey data is to be kept within the study team... our primary intent in gathering this data is that it be used for advocacy.” Anthony Ishak: “I would like to again recommend that the survey be sent out to everyone as we have been losing ground to the opponents who are reaching out to towns/cities faster than we are.” SIGNIFICANCE: A Mass General Brigham IRB-approved “research” survey of municipal officials (Principal Investigator: Jonathan Winickoff) is described by its own team as an instrument for building a target list of receptive boards of health — research infrastructure repurposed as a political targeting operation. Source: RE / FW NFG Survey — Town Follow Up.pdf; instrument “NFG Interest survey.”

“I Made the Quote Up”: A Fabricated Testimonial on a Campaign Flyer From: Julie Smith-Galvin <juliesmithgalvin87@gmail.com> To: Maureen Buzby Date: Wednesday, March 12, 2025 Subject: Re: NFG flyer “Take a look at this — we can change anything. I made the quote up but I'm sure its not too far from the truth and I can probably find someone to say it - lol.” SIGNIFICANCE: A promotional flyer circulated to the “volunteer task force” contains an admittedly invented “quote” the designer offered to retro-fit to a willing person — direct evidence of manufactured public sentiment.

Source: RE NFG flyer.pdf.

“We Cold Call Municipalities”: Scripting Residents to Simulate Local Demand Document: Buzby form letter to residents (“Dear Janet and Bob”) Date: April 27, 2025 “If you know someone in town government (especially the Health Director or a member of the Board of Health) make an introduction... You can just write... ‘I recently learned about Nicotine Free Generation... and wondered if it's being considered here. I've copied my friend Maureen Buzby, who is helping to spread the word throughout the state...’ and cc me... By the way, no pressure! We cold call municipalities but it's easier to have some kind of intro from a local resident.” SIGNIFICANCE: Buzby scripts private residents to manufacture the appearance of organic local demand and concedes the campaign “cold call[s] municipalities” — confirming the “grassroots” framing is generated from the Melrose hub. Source: 1_Document1 (16).docx.

The National / Global “Brain Trust” and the Pursuit of Bloomberg Money From: Michael Chou, John Maa, Chris Bostic (ASH), et al. To: The NFG / Tobacco-Free Generation network Date: Wednesday, July 16, 2025 Subject: Re: Early meeting of TFG Brain Trust Chris Bostic (ASH): “Re: Bloomberg — we've been working on them... There's a plan in place with ASH, WHO, UICC and The Union to gently move them along... All of their funding in the U.S. is funneled through CTFK.” John Maa: “it might be time to meet with the bill authors and ask if they would like to meet with Michael Bloomberg's team to request financial support to get this across the finish line.” SIGNIFICANCE: Ties the Massachusetts municipal campaign to a coordinated national and global operation actively courting Bloomberg Philanthropies, the Campaign for Tobacco-Free Kids, the WHO, UICC, and The Union for funding. A companion September 2025 message dispatches network members to send template “letters of support” into a town-council hearing in Ross, California, “so they know they are part of a national and global effort.” Source: Re Early meeting of TFG Brain Trust.pdf; FW Opportunity in CA.pdf.

PUBLIC HEARING OBSERVATIONS

The completed production allows the public-facing hearings to be read against the private planning that preceded them. In her own presentation script, Buzby describes the board-of-health channel as a controllable sequence rather than a deliberative one:

“Then I met with Boards of Health in all seven of my municipalities. They all voted to hold a public hearing. It's not a legal requirement but...” — and, describing a board that declined, that it “tabled it so it wasn't a no vote.” She contrasts the board route favorably with the town-meeting route precisely because outcomes are more controllable — noting of the open town-meeting format that “all you need is for one town meeting member to stand up and shout... and it's over.” Her FY25 quarterly report to the state records the same dynamic: “I presented NFG... to each Board, one-by-one. In each case Board members voted to move to the next step — a Public Hearing,” and notes that “Special attention has been given to Medford to move this policy along.” At the Pittsfield board, Buzby coordinated with the chair before any public agenda, reporting that the chair “really wants to avoid having members of the audience chiming in,” and that “they have received many emails in opposition — and they haven't even had it on an agenda yet. I explained the origin of all those robo emails.” During the Somerville hearing itself, task-force members coordinated in real time who would raise hands and testify (“YES please raise hand to speak!” — “Man, this lineup is amazing! GO TEAM”).

KEY FINDINGS

1. Melrose functions as the network's operational hub. The production shows Melrose personnel coordinating NFG activity in dozens of municipalities beyond the city's borders — the six collaborative communities plus Chelsea, Somerville, Newton, Needham, Mansfield, Belchertown, North Reading, Hopkinton, Dover, Natick, Pittsfield and the Berkshire and Franklin County towns, Rockport, and a forward target list including Belmont, Lexington, Bedford, Woburn, Burlington, Salem, and Beverly — and even a town council in Ross, California. 2. The previously withheld correspondence is now produced. For the first time the record contains the parent emails, in the participants' own words, rather than orphaned attachments — removing the evidentiary gap that constrained earlier, attachment-only analysis of this return. 3. A confidential steering committee formalizes the network. The “Massachusetts Project Sunset” concept note establishes an invitation-only body, sworn to confidentiality, whose stated function is to organize testimony before government bodies. 4. State funding underwrites and directs the campaign. MTCP/DPH pays the coordinators, folds NFG into their funded Board of Health Work Plans, standardizes their talking points through named contract managers, requires them to report new local policies to a designated state contact, and pays youth stipends tied to NFG — while the MMA maintains the official adoption scoreboard under a DPH grant. 5. Template infrastructure is centrally produced and iteratively maintained. The FAQ carries an eight-author byline (Savage, Ishak, Silbaugh, Chadwick, Hartman, Gottlieb, Buzby, Winickoff); the Winickoff/Hartman letter exists as a blank “Dear XXX Board of Health” template; and the MAHB model regulation ships with a “Checklist for Policy Decisions” that towns fill in.

6. Youth recruitment is institutionalized. Buzby maintains a paid youth-buyer “farm team,” recruited through PTOs and the state-funded 84 program (which made NFG its “Stipend Project for Fall 2025”); students were organized to enter hearings “complete with signs.” 7. Pre-hearing coordination and predetermined outcomes are pervasive. The record documents timing hearings to disadvantage opponents, coaching board chairs, whip-counting votes before votes, and adopting with “no public comment allowed.” 8. Municipal resources flow across jurisdictional lines. Melrose's print vendor billed the City for NFG signage deployed in six municipalities, including non-collaborative Chelsea — raising a concrete municipal-finance question about the authority for one city to buy another's regulatory materials. 9. The campaign is a node in a national and global network pursuing philanthropic funding. A monthly “brain trust” ties Massachusetts to ASH, PHAI, and international actors and is actively courting Bloomberg Philanthropies, CTFK, and the WHO. 10. Academic research is repurposed for political targeting. An MGH/Harvard IRB survey of municipal officials is used, by its team's own account, to identify and pursue receptive boards of health.

NETWORK DATA POINTS AND FUNDING CONNECTIONS

Person Municipality Date Action

Winickoff (MGH) Statewide “Team” Nov 30, 2024 Distributes template pediatrician letter + FAQ; directs pre-hearing lobbying

Buzby → Cullen Statewide Dec 20, 2024 Names the “Dream Team”; solicits state help (DPH) recruiting youth NFG panel (Chui, Somerville Dec 19, 2024 “Traveling panel” presentation to the board Gottlieb, Silbaugh,

Person Municipality Date Action Chadwick, B. Carroll)

Buzby / print vendor Stoneham, Nov–Dec 2024 Melrose billed for NFG retail signage for six Wakefield, towns Winchester, Malden, Reading, Chelsea

Ishak, Chadwick, Somerville Jan 18–20, 2025 Debate hearing timing to limit opposition Silbaugh

Albright (councilor), Newton Jan 13–22, 2025 Whip-count votes; offer Rep. Vitolo (bill sponsor) Ishak to lobby; passes 19-4-1, no public comment

Buzby Pelham Jan 22, 2025 “One-off orchestrated” resolution counted toward town total

Buzby, Wilusz Pittsfield / Jan–Mar 2025 Coach BOH chair pre-agenda; present to 26-town Berkshires alliance

Buzby, Elstein, Amherst, Feb–Mar 2025 “Flood the zone”; organize student testimony; Warner Belchertown, W. county target lists Mass towns

Full team Somerville Mar 20, 2025 Live hand-raising coordination during hearing; adopts NFG

Ishak, Tashie, Dover / Natick Mar 23, 2025 Recruit youth to write named board members; Chakilam move towns “in tandem”

Buzby (residents) Multiple Apr 27, 2025 Scripts residents to “cold call” officials and simulate local demand

Reynolds, Winickoff Statewide (survey) Apr–Jun 2025 IRB survey of ≥ 175 towns used “for advocacy” (MGH) targeting

Buzby → Rand (The Hopkinton Apr 16, 2025 Recruit local youth to “buffer against” the 84) “outsiders” label

Elstein, Chakilam Bellingham May 27–28, 1,287-postcard mailing + on-site flyering for 2025 town-meeting vote

Buzby, Merkin Hopkinton / May 2025 Pre-vets “independent” physician testimony; Manchester seeds a resident op-ed

Reynolds notes / Worcester Co. + Jun 2025 County-by-county BOH contact database built Elstein statewide with youth labor

Buzby → DPH Melrose (grant) Jun 30–Jul 2, Backdates FY26 state contract to preserve tobacco (contract) 2025 grant

E. Reynolds (Sen. State House Jul 7–14, 2025 Forwards hearing notice; asks Buzby to distribute Lewis office) to advocates; youth + 4 Children's Hospital MDs testify

Person Municipality Date Action

Chou, Maa, Bostic National / global Jul 16, 2025 “Brain trust” courts Bloomberg / CTFK / WHO (ASH) funding

Steering committee Statewide Jul 22, 2025 “Project Sunset” confidential charter

Buzby, Gottlieb ASH Endgame Aug 25, 2025 Co-moderate “How Massachusetts Advocates are (PHAI) Summit, Chicago Pioneering NFG”

Buzby Ross, California Sep 8, 2025 Lobbies an out-of-state town council using her Melrose title

Funding connections documented in this production: • MTCP quarterly payments to the City of Melrose (contract INTF2903P01190128226): \$22,500 (Oct–Dec 2024), \$22,500 (Jan–Mar 2025), \$14,693.20 (Apr–Jun 2025), and \$22,500 (Jul–Sep 2025, FY26 Q1) — all prepared by DPH fiscal staff. • FY26 MTCP budget for the Melrose program: \$90,000 (Director salary \$59,888; part-time inspector; fringe; \$9,000 admin), including \$900 in youth stipends and supplies “plus printing of NFG policy store signage.” • Youth buyers paid as City of Melrose employees at \$20.00/hour; recruited through PTOs and the state-funded 84 program. • The MMA adoption tracker is “a Technical Assistance Project for cities and towns funded through a MA DPH grant to the MMA”; MTCP lists PHAI, MAHB, and MMA as its “Policy Technical Assistance” contractors. • MassCALL3 funding to the coalition was cut from \$250,000 to \$125,000; the FY25 Public Health Excellence grant totaled \$561,197.45. • National tier: ASH names funders including the Johns Hopkins Institute for Global Tobacco Control, Kenvue, and Truth Initiative; the “brain trust” targets Bloomberg Philanthropies and

CTFK.

FINANCIAL CONTEXT (IRS FORM 990 ANALYSIS)

Financial information derived from IRS Form 990 filings of organizations identified in this production provides context for the campaign's capacity and incentives. The Public Health Advocacy Institute (PHAI), directed by Mark Gottlieb at Northeastern University School of Law — which supplies the model documents, pledges pro bono litigation defense to adopting municipalities, and hosts the [phai.org/ NFGMA](http://phai.org/NFGMA) campaign site — reported total revenue of approximately \$21.2 million in its most recent available filing (a sharp increase over the prior year's roughly \$0.74 million), with executive-director compensation near \$325,000. These figures, carried forward from the prior 990 analysis, should be re- verified against the latest available filing as part of follow-up. On the public side, the Massachusetts Tobacco Cessation and Prevention Program is a DPH-funded program operating through regional collaboratives; the production's payment vouchers, budgets, and quarterly reports document the state dollars flowing to the Melrose program and the youth stipends attached to NFG. The convergence is the salient fact: the entities that draft the model regulation (PHAI, MAHB, MMA), the program that funds the local coordinators (MTCP/DPH), and the coordinators who carry the policy to the boards are financially and operationally interlocked.

EVIDENCE SUMMARY

Evidence Category Status Summary

Pre-Hearing Coordination Confirmed Winickoff directive to lobby officials before hearings; Buzby coaching board chairs (Pittsfield, Mansfield) before public agendas.

Template Usage / Distribution Confirmed Eight-author FAQ, blank “Dear XXX” letter, MAHB model regulation with a fill-in checklist, standardized signage and scripts.

Network Activity Confirmed Named “Dream Team,” bi-weekly task-force Zooms, shared Google Drive/Group, traveling presentation panel.

Cross-Municipality Coordination Confirmed Melrose signage bought for six towns; Buzby presenting/ testifying statewide and in Ross, CA; cross-town youth recruitment.

Youth Recruitment Confirmed Paid youth-buyer “farm team”; The 84 “Stipend Project”; students organized to testify “complete with signs.”

Predetermined Outcomes Confirmed Hearing-timing to limit opposition; “no public comment allowed” adoptions; pre-vote whip counts; Pelham count- padding.

Funding Connections Confirmed MTCP quarterly payments and FY26 \$90,000 budget; DPH- funded MMA tracker; national Bloomberg/CTFK pursuit.

Concealment / State Direction Confirmed “Project Sunset” confidentiality charter; private Gmail distributions; MTCP contract-manager directing messaging.

What These Documents Demonstrate • State-funded programs (MTCP/DPH) identify, track, direct, and finance municipal NFG adoption as a program metric. • External advocates and academics contact and coach local officials before the public is aware a policy is under consideration. • Centrally maintained templates — letters, FAQs, model regulations, signage, op-eds — manufacture the appearance of independent local authorship. • Youth are recruited across municipal lines, and paid through state programs, to supply testimony. • Public officials act as campaign coordinators rather than neutral administrators, and the process is deliberately kept confidential.

CONCLUSION

The completed City of Melrose FOIA return is the keystone of this investigation. Where earlier productions permitted only inference, the correspondence now produced establishes — in the participants' own words — that the Massachusetts “Nicotine-Free Generation” movement is a centrally organized, state-financed campaign run out of a single municipal tobacco-prevention office, coordinated with academic, legal, association, and national partners, and deliberately engineered to look like spontaneous local action. The most significant evidence is no longer a single document but a pattern: a confidential steering committee sworn to secrecy; a state contract manager standardizing the “independent” boards' talking points; hearings timed and structured to exclude the public; adoptions counted in towns with no retailers; a fabricated testimonial; and a coordinator who concedes the campaign “cold call[s] municipalities” and recruits local faces “to buffer against” the charge that it is run by outsiders. This return confirms the investigative thesis and elevates Melrose from a provisional to a confirmed Tier 1 Network Hub. It should serve as the anchor document for the Master Investigative Briefing Memo and as the foundation for the targeted follow-up requests above.

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