

STATE OF NORTH DAKOTA

NORTH DAKOTA INSURANCE AND SECURITIES DEPARTMENT

IN THE MATTER OF:

**Shayan Mashatian,
Silverberry Group, LLC,
and WoundScribe AI Corp.,**

Respondents.

**STOP ORDER SUMMARILY
SUSPENDING THE OFFER AND
SALE OF MISREPRESENTED
SECURITIES AND NOTICE OF
RIGHT TO REQUEST A
HEARING**

Case No. 26-2244

**THE INSURANCE COMMISSIONER FOR THE STATE OF NORTH DAKOTA TO THE
ABOVE-NAMED RESPONDENTS:**

The North Dakota Insurance Commissioner has a reasonable basis to believe that the Respondents have engaged in, are engaging in, or are about to engage in, acts, practices or transactions, as more fully described below, which are prohibited under Chapter 10-04 of the North Dakota Century Code. It is necessary and appropriate in the public interest and for the protection of investors to restrain these acts, practices, or transactions of the Respondents.

1. Shayan Mashatian, last known executive and registered agent of Silverberry Group, LLC and WoundScribe AI Corp., with a last known address of 209-500 Klahanie Dr., Port Moody, BC, Canada. At all times relevant hereto, Respondent Mashatian operated and controlled, or held out as being as being operated and controlled, Silverberry Group, LLC and WoundScribe AI Corp., as executive.
2. Silverberry Group, LLC, was a North Dakota limited liability company formed on June 3, 2022, as a single member limited liability company with Shayan Mashatian as

owner and organizer, with an address of 4200 James Ray Dr., Grand Forks, North Dakota. Silverberry Group, LLC was converted to WoundScribe AI Corp., a Delaware corporation, on December 12, 2025.

3. WoundScribe AI Corp. is a Delaware corporation created by the conversion of Silverberry Group, LLC, a North Dakota limited liability company, to WoundScribe AI Corp., under the laws of the State of Delaware, on December 12, 2025, with Shayan Mashatian as the sole member of the board of directors.
4. On or about September 16, 2025, Silverberry Group, LLC, executed a Simple Agreement for Future Equity ("SAFE") note with an investor, Bill Thompson of Missoula, Montana.
5. The SAFE note executed on or about September 16, 2025 by Silverberry Group, LLC noted that neither the SAFE note nor any associated securities were registered in accordance with the Securities Act of 1933, subsequent amendments to the Securities Act of 1933, or state securities laws as might be applicable. No specific basis for an exemption is made in the SAFE note; however, agreements of this nature generally operate under the exemptions from registration provided by 17 C.F.R. §§ 230.500 – 230.508 ("Regulation D"). Rule 503 of Regulation D requires an issuer who offers or sells securities pursuant to a Regulation D exemption to file a Form D notice with the U.S. Securities and Exchange Commission ("SEC").
6. Investigation by the North Dakota Insurance and Securities Department (the "Department") determined that a Form D notice of intent to offer for sale or sell equity interest in Silverberry Group, LLC to investors in or from the state of North

Dakota under a Regulation D exemption from registration was not filed in the SEC's Electronic Data Gathering, Analysis, and Retrieval ("EDGAR") system.

7. Investigation by the Department determined that notice filing was not made with the Department by the Silverberry Group, LLC for the offer for sale or sell of equity interests in Silverberry Group, LLC. A notice filing of such a security, should it be subject to an applicable federal exemption, must be made with the Department, pursuant Section 10-04-08.4 of the North Dakota Century Code ("N.D.C.C.").
8. Pursuant to N.D.C.C. § 10-04-08.4(6), the Commissioner has the authority to summarily suspend the offer and sale of a federal covered security in this state if it is found to be in the public interest or there is a failure to comply with the provisions of N.D.C.C. § 10-04-08.4. The activities described above are sufficient grounds for the Commissioner to issue a stop order suspending the offer and sale of securities using SAFE notes or other instruments conveying any equity interest or convertible equity interest in Silverberry Group, LLC and/or its successors by Respondents.
9. The following Order is necessary and appropriate in the public interest and for the protection of investors.

NOW, THEREFORE, IT IS ORDERED, pursuant to N.D.C.C. § 10-04-08.4(6), that the Respondents, Shayan Mashatian, Silverberry Group, LLC, and WoundScribe AI Corp., shall immediately stop offering for sale, selling, or effecting securities or convertible securities conveying interests in Silverberry Group, LLC and its successors. This Order excludes investors that have previously invested with Shayan Mashatian, Silverberry

Group, LLC, or WoundScribe AI Corp., or who are currently investors with the Respondents.

NOTICE OF RIGHT TO REQUEST A HEARING

YOU ARE NOTIFIED that pursuant to N.D.C.C. § 10-04-16 you may request a hearing before the Insurance Commissioner if such a written request is made WITHIN FIFTEEN (15) DAYS AFTER THE RECEIPT OF THIS ORDER. The Respondents have the right to be represented by legal counsel at the hearing.

IN TESTIMONY WHEREOF, witness my hand and seal this 24th day of September, 2026.




Jon Godfread, Commissioner
North Dakota Insurance and Securities Department
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