

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: October 15th, 2021

Sender	Date	Comment/Question
Brandon Chewey	9/15/2021	<p>Sorry, I intended on speaking at today's meeting (September 14, 2021) but I was stuck in a meeting until 8pm. Apologies for missing my scheduled testimony.</p> <p>Greetings NJ CRC,</p> <p>My name is Brandon Chewey. I'm a person 8+ years in recovery from an 11 year heroin addiction via the use of specific cannabinoids, Terpene profiles & select strains.</p> <p>I have been arrested over 30x for non-violent, victimless drug "crimes" in Monmouth County & I have just been released from probation (3 weeks ago) for the first time in my adult life... I am free to cross state lines - without giving 30 days notice- or peeing in a cup, for arrests of cannabis which jailed me for a collective of 6 years, introduced me to drug court (2008) & disenfranchised my youth, as well as my entire adult life for an herb that I knew was the only medicine beneficial for me.</p> <p>I founded the Asbury Park Cannabis Community Inc. in 2017, as I was just under 3 years in recovery (on methadone/M.A.T.) & had just become a legal "N.J.M.M.P." in late 2015...while on probation (after a very corrupt trial in which I plead guilty after exhausting lawyer funds from the \$130,000 bail that was given to me for 2.5 ounces of cannabis - as an NJMMP)</p> <p>The Asbury Park Cannabis Community Inc. was formed to establish a standard for the culture, economics & patients rights/information to the NJMMP, along with doctor referalls.</p> <p>2 months after finding the non-profit, Asbury Park Cannabis Community Inc. I founded Shoreganix LLC. (Just 2 years free from 11 years addiction) as I had found recovery from opiates & wanted to share it with all - as my friends/former affiliates are still dying weekly due to our opioid epidemic... it never gets easier.</p> <p>I am blessed & was spared from death unlike my countless friends... my family says God has a plan for me to help others. Since finding sobriety via cannabis - it has been my obsession, passion & therapy. *The therapuetic value in home cultivation/breeding select strains for specific client diagnosis is so extremely life changing for so many.</p> <p>I would like to thank you for all of your work & difficult task in selecting the appropriate licenses/people to represent an industry that was developed/innovated by "criminals" for 70+ years.</p> <p>This leads me to my question.</p> <p>As a person in recovery, I've built wealth just under 100k to my name after 8 years of fighting sobriety, advocating, running my businesses & working passionately to help others find relief from opiate addiction, successfully.</p>

		<p>My question is this. I have approx 70k to my name, spent the last 11 years fighting for freedom from addiction that began when I was "probated" from consuming cannabis at age 18.</p> <p>I've been released from probation just 3 weeks ago for the first time in my adult life at age 36... do I have a chance? Risk is</p> <p>My question is this, dk you genuinely believe a person like myself, who was just released from probation (1 year early for compliance & \$6380 in fines, for 2.5 oz pot arrest from 2015), whom has saved just 70k after 18 YEARS of pot arrests - would be wise to apply for a "legal license", knowing the costly legal, as well as license/compliance fees needed to begin a micro grow facility?</p> <p>I know the question is speculative, but honest in fact. My lifes work is breeding organic, living soil cannabis for medical diagnosis treatment.</p> <p>In order for me to successfully apply, I would have to sacrifice everything I've worked for - take out loans, use the money from the non-profit & that would leave me living paycheck to paycheck, as a person who has done WELL post-rehabilitation/incarceration versus the majority whom face 11yr opioid addiction.</p> <p>Again, thank you for all you do, I would love to apply, but if standing the "best chance to win" depends on having the property the fastest, the team the fastest, best atty- that will empower the black market</p> <p>I consult w/ many seeking license in 2 categories. Those w/ money/investors etc. Then, us felons w/ 70k & loans. Worth Risk?</p>
Teri Festa	9/16/2021	<p>Is there priority within the priority review status meaning for instance, will woman-owned business get a higher priority status than the other two categories and if we qualify for more than one status e.g. MBE & WMBE will that be prioritized over the applicants with only one certificate?</p>
Shea Douglas	9/21/2021	<p>As a social equity applicant my team and I are very pleased to see that the State of New Jersey is taking measures to make this industry as fair and equitable as possible. However, being in the trenches scouting for a location is posing to be just as difficult a process as the application itself. For example: Bloomfield has graciously opened its doors to 6 retail dispensaries (3 Regular and 3 Micro dispensaries). However 1 of the licenses has already been accounted for from RISE which is a "Big Box" dispensary growing around the country. When RISE came to NJ it was exclusively medical but they have converted the license over to rec. Bloomfield is now down to 5 licenses before the application has been released to the public. Another big issue are the areas the township has restricted us to are almost non-existent. For example we cannot have the establishment upon any premises in which operates a grocery store, delicatessen, indoor food market, or other stores engaging in retail sales of food, or in or upon in licensed retail sales of alcoholic beverages; (schools, house of worship - goes without saying) These stipulations greatly limit the other 5 applicants from operating anywhere in the township. Townships have every right to restrict and dictate where these dispensaries will go but when you scout the area you scratch your head like "where do they want us to go?" Are they saying they want 6 dispensaries (3 regular 3 micro business) to look good on paper or did they really vet these areas properly? When you have small companies wanting to compete and you have a big box like RISE who has the cash to buy out a laundromat which sits on its own island</p>

		<p>it gives the impression of - do they really want us here? Are the towns saying they want us here “social equity applicants” and making it extremely difficult for us because they can. The commercial locations they have restricted us to are old dilapidated areas that have not had an upgrade since the 1970s and... there are still conditions which I mentioned previously that disqualifies the location so you cannot even rent the space. We then go to other townships that have adopted the same subtle exclusion and it is frustrating because this entire process is hard (to be expected) but on the local level municipalities are making it harder and an air of we really don’t want you here. There needs to be governance from the state to make sure the ordinance on the local is also fair and equitable and local officials need to scout out for themselves what these applicants are facing.</p>
Rick Murad	9/22/2021	<p>Why is it taking so long for the state to decide the winner of the 2019 grow licenses. How much tax revenue could have been collected if the state made the decision in 2019 as planned. There would have been 6 grow operation running and the state and towns would have collect how much in estimated taxes.</p>
Shawn	9/27/2021	<p>2019 applicant who are still holding the properties should prioritize when scoring or awarding license by requesting proof of holding.</p>
Mario Ramos	9/29/2021	<p>please let's not forget the non-violent cannabis prisoners. the time has come not to hesitate and free all non-violent cannabis people in prisons county jails parole probation drug court intensive supervision program and monetary gains the cannabis commission has spoken the people of NJ have spoken it's legal medical and recreational NJ this has to be our next move it is a victimless out-dated law no person should be profiting from cannabis in NJ while young and old of all colors are behind bars for the same plant goto @lastprisonerproject and get involved.</p>
Tom Turcich	10/4/2021	<p>I don't understand how the Micro Social Equity Business live in the town you apply for or neighboring town, is relevant when so few towns have agreed to participate. The closes I come is 2 towns away. My best bet is a town 3 away but still within 6 miles. Why don't you do a radios or some other fair system. What if you live along the Delaware river and you are more limited.</p> <p>Am I wasting my time trying to do a retail business in a town I don't border????</p>
Karen Wasleski Ingenito, M.D.	10/4/2021	<p>I am writing to request the Commission require that Alternative Treatment Centers (ATCs) make terpene concentrations available to Medicinal Cannabis Program (MCP) patients. My son is a New Jersey MCP patient; I am his registered caregiver. As he doses by milligrams of THC, cannabinoid concentrations are necessary to calculate his dose, but do not correlate with efficacy. For us, as for many medical cannabis patients, terpene concentrations are critical to identify a strain likely to relieve symptoms. Patients with anxiety, such as my son, typically respond well to strains high in myrcene, linalool and / or beta-caryophyllene. Without access to laboratory terpene analysis, identifying strains rich in these terpenes is a guess at best. In addition, an Indica, Sativa or Hybrid designation does not accurately predict therapeutic effect. Indicas are conventionally are considered “calming”, but my son has tried 4 different Indica strains that exacerbated the anxiety we were trying to treat.</p> <p>Both cannabinoids and terpenes have physiologic effects and work synergistically. Without access to laboratory analysis of terpene concentrations, MCP patients do not have all the information necessary to make educated, cost-effective decisions</p>

		<p>regarding the strain(s) that will effectively treat their specific condition. I ask for terpene information at each ATC visit and am always told the state does not require it be made available to patients. I know other caregivers who receive similar responses from their ATCs. I ask that the Commission require ATCs to provide both cannabinoid and terpene concentrations to MCP patients, and that this information be posted on their website, at the facility and on the label.</p> <p>Respectfully, Karen Wasleski Ingenito, M.D.</p>
John Hatzicostas	10/4/2021	<p>Can you please explain how the bill A20 went from unions would be a bonus to what appears on the rules and regulations to be, that union attestation is a must, when everyone knows how corrupt the New jersey unions are? My family grew up union and I saw it first hand.</p>
James Veach	10/7/2021	<p>The CRC regulations issued on August 19th contain many provisions intended to promote social equity in commercial cannabis. How may municipalities enhance or support the CRC's social equity efforts? Specifically, what provisions may be added to local ordinances or local regulations to boost New Jersey's attempt to see that minorities, women, disabled veterans, and those affected by the criminalization of marijuana be given priority in commercial cannabis licensing, promotion, or other opportunities?</p>
Gary Krimersmoys	10/8/2021	<p>Wondering if entitles holding Manufacturer license, in the upcoming Applications, can manufacture prerolls?</p> <p>Thank you, Gary</p>
Mary Smith	10/11/2021	<p>If we secure a property for the application, but the landlord backs out of lease or property falls apart after receipt of a license, will we be permitted to move locations?</p> <p>Can you further define how an individual can qualify as an owner? The regulatory definition seems to indicate that one can be considered an owner through substantial interest in a company even without equity ownership. Can you confirm that this is the case? Can you provide examples of ways applicants can meet the 5 year New Jersey residency bonus if the New Jersey resident does not have equity ownership in the business?</p> <p>Is a microbusiness Delivery license holder limited in the amount of products they can deliver?</p> <p>Can you further describe the limitations around canopy space and micro businesses, particularly that the building is limited to 2,500sqft and canopy is limited to 2,500sqft? Further, is canopy inclusive of only vegetation and flowering or does it include all stages of cultivation?</p> <p>For ATC license holders converting to the adult-use program-are they restricted from vertical or will they not be included in the moratorium restricting vertical integration?</p> <p>If a microbusiness applicant applies for a Conditional Application and then applies for the Conversion to an Annual License application (and is approved), what is the application process to convert to a standard sized facility? Further, if the cap on standard sized cultivation facilities is reached before an Annual license holding</p>

		<p>microbusiness applies to become a standard sized cultivation facility, will the Microbusiness be unable to convert?</p> <p>If a business holds a Manufacturing license, may it produce pre-rolls? In other words, is the production of pre-rolls limited only to cultivation facility license holders or can they be made by either cultivators or manufacturers?</p>
Maggie M.	10/12/2021	<p>N.J.A.C 17:30-10.2(a) authorizes a Class 1 Cannabis Cultivator to: Possess, propagate, germinate, plant, cultivate, grow, harvest, dry, cure, process, and package cannabis; (emphasis added) as well as sell this usable cannabis to a variety of outlets, while N.J.A.C. 17:30-10.2(b) prohibits a Class 1 Cannabis Cultivator from manufacturing. N.J.A.C. 17:30-11.2(a) permits a Class 2 Cannabis Manufacturer to: Develop, produce, manufacture, prepare, or otherwise create and package cannabis products (emphasis again added). Would manufacturers or cultivators be the authorized licensee to make pre-rolls, which involves processing and packaging as well as manufacturing and preparing?</p>
Andrew Deck	10/14/2021	<p>Clinical Registrant Question</p> <p>I would like to thank the Cannabis Regulatory Commission for consistently raising the needs of medical cannabis patients prior to adult use implementation. We thank the Commission for reinforcing that regularly. There has still been no guidance or additional discussion and information about clinical registrant licenses. Given the urgent need for additional medial research and support for patients in New Jersey, could the Commission provide and update further guidance and a timeline on when those applications will be released?</p>
Keith Bolden	10/15/2021	<p>Validation is a critical component of legalization and regulatory efforts. Are the Cannabis products that will be made accessible to the community via the issued licenses validated for appropriate safety, dosage, or efficacy? What will that process be for your commission to test those products.</p>
Jean Talleyrand MD	10/15/2021	<p>As a physician observing Cannabis users in California for more than 20 years, I am encouraged to see the benefits of use. However, it is concerning that government regulations don't request observational studies to generate real world data on safety and efficacy. Observational studies can be inexpensive surveys that provide information that reduces potential adverse events. Our Cannabis research organization would happily present a proof of concept. www.thecesc.org</p>
LaQue Davis	10/15/2021	<p>Will there be enough cultivation, distribution, and wholesalers to meet the supply and demand of retailers before the opening of recreational dispensaries?</p> <p>Do we have a expected date to be ready to open dispensaries?</p> <p>Do the micro business license falls under both the conditional license and standard license applications?</p> <p>Will it be best for a social equity applicant who is trying to raise capital for their business to apply for a (micro business) conditional license?</p> <p>After announcing the awards for the cultivation license, will the companies names be posted?</p> <p>In regards of the 10 employee rule for micro businesses, do the actually owners counts as employees? And if not in detail, what titles does?</p>

Alexandria Alcala

10/15/2021

Thank you so much for reading this. I am a patient care specialist at a medical dispensary in Manhattan, NY. I have purchased in every recreational-use market in the US (January 2021). I am also NJ Cannabis Certified through Mercer Community College.

I want to start having a conversation about regulations separating the adult and medical markets in retail dispensaries- having extensive experience in the latter and lots of personal experience in the former. I am often the point-person for intaking "first time patients". I have to hear their medical background and prepare it for an on-staff pharmacist to walk them through different consumption methods, CBD:THC formats, strains, endocannabinoid systems etc. Then, through trial and error and applying what we know from pooled data- we find what cannabis product works best. Oftentimes, tolerances change or patients are interested in changing their consumption method - where a pharmacist is always available to answer specific questions, educate, and walk the patient through more options.

The quote Executive Director Jeff Brown used about medical patients really resonated with me. It is one of the hardest things I've ever done to witness patients lose familiarity and control over their body. These patients deserve respect. Patients need individualized, cannabis-specific pharmacists and physicians to help get them medicated appropriately. It's heart-breaking when a healthy able-bodied non-patient individual walks into my dispensary asking for weed while I am with a terminal patient, or a patient in pain, or a patient that took a train two hours to get a specific product that is not available anywhere else in the state.

Medical dispensaries are not environments for recreational sales. It is almost making a mockery of the medical program and patients. A couple of weeks ago I went to a party in Jersey City. There were DJs, dancing, liquor being sold, live artists and fun being had! I had a great time. I recently found out it was the location where Harmony Dispensary is opening their satellite "medical" dispensary. No patient should be subject to a party when they are suffering. If they elect to go to a recreational dispensary at their discretion- that should be an option. But as a patient-facing care specialist at the most compliant medical dispensary in New York - it is a huge mistake to comingle medical dispensary locations. There should be medical dispensaries and recreational dispensaries (that could also serve medical patients if the medical patients choose to subject themselves.) Medical patients deserve the option and more robust options for talking to pharmacists on-site.

Thank you so much to the committee for hearing my commentary and I hope these patients get the respect, privacy, safety, and guidance they deserve.

-Alexandria