

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: December 7th, 2021

Full Name	Date	Comment/Question
Dominic Rivera	11/11/2021	If we get accepted for Class 5 retail license who do we purchase the products from are there going to be Wholesalers or distributors that we can get us the product and who are does companies. Can some one give us a call or email that information Thank you for your time.
Osbert Orduna	11/11/2021	<p>Part 1 of 2 : We are reaching out to bring your attention to a major issue of inequality that currently exists within the Cannabis Regulatory Commission’s published regulations that unconstitutionally discriminates against service disabled veterans not residing in New Jersey.</p> <p>VA data shows that New Jersey has 60,027 service-connected disabled Veterans(2) and only one hundred fifty (150)certified Service Disabled Veteran Owned businesses(3), none of which are in cannabis.</p> <p>A person is not born a Service Connected Disabled Veteran. In order to earn this designation a few things had to have happened; first, they volunteered for military service and then, during the course of their military service, they were injured in the line of duty. Disabled Veterans a r e people who served our country and who earned the moral obligation of our nation to provide the disabled veteran a range of benefits designed to ease the economic and other losses and disadvantages incurred as a consequence of the disability received in service to our Nation.</p> <p>In 2015 the New Jersey Set-Aside Act for Disabled Veterans' Businesses (PL 2015 Ch.116) established a 3% set-aside of all state contracts to service disabled veteran owned businesses and defined “Disabled Veteran” as: “a resident of this State who is certified by the federal Department of Veterans' Affairs as having any degree of service-connected disability” This definition is discriminatory. Disabled Veterans are not just residents of New Jersey. They are residents of our nation, who physically carry the scars and injury of their service and earned the designation of “ Disabled Veteran.” To arbitrarily include being a resident of New Jersey as part of the official definition of what constitutes who has earned and qualifies for the title of “Disabled Veteran” dishonors the service and physical sacrifice of every other Disabled Veteran in our nation and actually discriminates against non-resident Disabled Veterans.</p> <p>We are reaching out to bring your attention to a major issue of inequality that currently exists within the Cannabis Regulatory Commission’s published regulations; specifically, that the regulations contain language that discriminates against non-resident disabled veterans who are seeking to operate a cannabis business in New Jersey. We would like to direct your attention</p>

to section 17:30-6.4 DIVERSELY OWNED BUSINESSES section a) which states that: “until the time that the commission develops its own certification process a “Diversely Owned Business” means a license holder that has been certified as a minority business, as a woman’s business, as a disabled veterans’ business, by the Division of Revenue and Enterprise Services in the Department of the Treasury.” This is exactly where the problem lies and where the inequality with the certification needed by service disabled veteran entrepreneurs begins. Simply put, in order to meet the requirements of N.J.S.A. 52:32-31.2, the service disabled veteran business owner must be a resident of New Jersey, yet neither the Minority Business Enterprise nor Women Business Enterprise certification programs have this or any other type of New Jersey residency requirement. In fact, MBE and WBE business owners can literally live anywhere in the world! Moreover, even a New Jersey domestic business that is providing jobs and tax revenue to the New Jersey economy, and which is 100% owned by a service disabled veteran who resides in a neighboring state like Pennsylvania or New York, would be unable to get certified in New Jersey. That is not equity and inclusion. Service Disabled Veterans businesses owners deserve to be treated in an equal manner, instead of being held to a discriminatory, unconstitutional, and arbitrary residency standard. When looking at residency standards in cannabis and other regulated industries the courts have agreed. For instance, the United States District Court for the District Part 1 of 2

Part 2 of 2 : For instance, the US District Court for the District of Maine struck down Maine’s residency requirement as part of litigation entitled NPG, LLC d/b/a Wellness Connection and High Street Capital Partners, LLC v. City of Portland, Maine, Docket No. 2:20-cv-00208-NT (August 14, 2020) (the “Maine Challenge”).

There, Maine’s Marijuana Legalization Act required that an applicant for a state license be a resident – or, in the case of a corporation – that every corporate officer be a resident and a majority of the shares of the corporation be held by Maine Residents or Maine business entities. 28-B M.R.S. 2020(2). Interestingly, Maine itself decided not to enforce this requirement, as its own Attorney General found that the requirement would be “subject to significant constitutional challenge and [was] not likely to withstand such challenges.” Nevertheless, the City of Portland decided to enforce this requirement as part of its local approval process. In ultimately ruling that this residency requirement violated the Constitution, the District Court found that “the Framers’ purpose [was] to prevent a State from retreating into economic isolation . . . that had plagued relations among the Col onies and later among the States under the Articles of Confederation.” As a result, a state or local law that “discriminates on its face against interstate commerce, whether in purpose or effect, demands heightened scrutiny,” which requires a court to invalidate it “unless it furthers a legitimate local objective that cannot be served by reasonable non-discriminatory means.” Moreover, these arguments are not simply confined to the cannabis context. For instance, as recently as June 26, 2019, the Supreme Court of the United States struck down a Tennessee law that imposed durational-residency requirements on persons and companies seeking to operate retail liquor stores, requiring applicants for an initial license to have resided in the State for the prior two years. See

Tennessee Wine and Spirits Retailers Assn. v. Russell F. Thomas, Executive Director of the Tennessee Alcoholic Beverage Commission, No. 18-96 (2019). There, similar to the Maine Challenge, Tennessee’s Attorney General had agreed that the residency requirements discriminated against out-of-state economic interests in violation of the Commerce Clause. The Supreme Court unequivocally held that local protectionism is not a legitimate interest that permits a State to violate the interstate commerce clause, especially when there are other nondiscriminatory means to protect any other purported concerns.

We the co-sponsors of this letter ask that the New Jersey Cannabis Regulatory Commission review N.J.S.A. 52:32-31.2 and remove the arbitrary inclusion of being a resident of New Jersey as part of the official definition of what constitutes who has earned and qualifies for the title of “Disabled Veteran”. As Veterans Day approaches we ask the New Jersey CRC to honor the service and physical sacrifice of every Disabled Veteran by issuing their own certification process guidelines for what constitutes a Disabled Veteran owned business and remove the New Jersey residency requirement so that the Disabled Veteran owned business certification can equally mirror the terms of the New Jersey Minority and Woman business certifications, neither of which have a residency requirement for the majority owner.

Respectfully, Osbert Orduna:Service Disabled Veteran; Hugh Giordano:UFCW-New Jersey; Jon Malave:QAcanna; Marta Spegman:TriState Cannabis Alliance; Christine DeLaRosa:The People's Ecosystem; Glenn Obedin Esq.; Anjanette Cabrera Esq. Part 2 of 2

Noah Fouad

11/13/2021

It's a shame that we voted for cannabis but are still being treated like criminals, if we want to grow our own cannabis then we get arrested for it. If we don't agree to pay the unfair prices and grow our own medicine then we risk being arrested. Why do you lie to the public and say that legalization is a social justice reform movement? If it is then stop with the arrests. Just allow us to grow our own product. It's very unfair and this is the third time I said something without a response. I will be bringing this to the public. I will voice my reasoning on every public platform available. I will bring to light the corruption that is medical marijuana in NJ, if you think I'm lying, there's a lawsuit going on right now in Hoboken because of the corruption. All we ask is for fair opportunity and the chance to grow our own medicine. Show the people of NJMMP that you stand with them and not the oppressive business men who makes life for our brothers and sisters difficult. I will not rest until it is legal to grow our own medicine. New Mexico has a marijuana program that looks to be the best in the country why is NJ the only state that doesn't allow homegrown? We're the Garden State!!!!

Sean Welsh

11/15/2021

Hello I am currently a new medical marijuana patient. But I have a serious issue with the fact that marijuana concentrates in their wax, shatter, live resin, and live rosin forms are NOT available in the state of NJ. In almost all medical and all legal markets they are available. They are an essential product when dealing with high level pain and opioid abuse for marijuana patients and the fact that concentrates in this form are not available makes patients continue to use the BLACKMARKET to obtain this crucial form of marijuana medicine. Not only do patients not want to continue to buy unregulated concentrates from the blackmarket, but the state is also losing out on millions of tax revenues. It is my understanding that if the CRC allows ATCs to provide this crucial medicine, these concentrate forms will be available for patients immediately. Thank you for your time and I look forward to your action.

Haider Rizvi

11/17/2021

I'm hoping the CRC can reconsider allowing DBA under LLCs that many of us have already created. This is just an added complication we do not need and hearing back from the state takes very long and only delays us more. I had to go through multiple LLC names before I finally got one (that I didn't want) that wasn't already taken. And many of

		our attorneys advised us that it's alright since we can still choose a creative name for our business entity and use the DBA designation. Thank you.
Ryan Magee	11/17/2021	<p>The regulations and Notice of Application require municipalities with a governing body to provide support by way of resolution. However, some municipalities defaulted to the statutory defaults due to an inability for the mayor and town council to agree upon a cannabis ordinance. In those scenarios, if disagreement remains, those municipalities will also be unable to pass a resolution as it applies to individual applicants, even though the municipality is required to permit all forms of cannabis operations. How does the CRC intent to address this scenario? In municipalities with no cannabis ordinance, will a letter from the Mayor suffice to demonstrate municipal support?</p> <p>Can applicants be awarded partial points for each scored measure? How does the CRC define its pass/fail approach to scoring?</p>
Kris Ware	11/17/2021	<p>Are recreational use cannabis retail dispensaries going to be able to hire their own delivery drivers with their own GPS and lockbox enabled delivery vehicles, or are they going to be restricted to only working with contracted delivery services, as in the language it seems like it may be possible to do so without these services exclusively?</p> <p>With regards to consumption lounges, will recreational use cannabis retail dispensaries be allowed an endorsement similar to those allotted for medical cannabis dispensaries, and if so will the consumption lounges space factor with relation to micro businesses into the max 2,500 sqft space for the retail location? Additionally, the 2,500 sqft space, is it referring to the entire business, i.e. retail showroom, office and consumption lounge or only the sales floor space?</p> <p>Lastly, if you live in say a town like Toms River, where they have chosen to opt out of cannabis businesses, but want to get into the industry as a diversely owned micro business, would the next available closest municipality that has opted in then be possible to do so in?</p>
Morgan Sokol	11/19/2021	<p>Enclosed are questions for the CRC regarding the upcoming 12/15/21 cannabis application submission:</p> <ol style="list-style-type: none"> 1. For a conditional application, if an applicant lists a property and includes a letter of support, does that increase their points on their business plan? 2. How will cultivation conditional applications be prioritized towards the 37 available licenses? Will they be prioritized based on the submission time of the initial conditional application, or will they be somehow prioritized during the conversion phase? If they are prioritized in the conditional application phase, how will municipal preference be a factor when a location is not required? 3. For the conditional app, what is required in the "overview of proposed financing for the business" section? 4. Will we be able to log into the application system ahead of 12/15 to make sure we know how it works and troubleshoot before the submission date? 5. Will we be able to load all attachments and information into the application system ahead of 12/15 so we just press "submit" on 12/15 at 9AM? Or the soonest we can load all application materials into the portal is 9AM on 12/15? 6. Given that the "Final Notice of Application Acceptance" says that it either awards all points or no points for each written section, no partial points, does an applicant with established non-profit partnerships get more points in the Community Plan section than an applicant that says it will establish partnerships in the future? 7. Is the CRC looking at the cultivation tiers (except for microbusinesses) separately? For example, will the CRC evaluate only Tier VI cultivation initial conditional applications together, or will it instead evaluate all cultivation initial conditional applications together

regardless of tier size (recognizing that microbusinesses are prioritized over other license types)?

8. How will municipal preference be factored in, and at what phase? For instance, will it effect priority of the applicant or will it give extra points?

9. Are Persons of Interest and Entities of Interest required to complete the criminal history background check before submitting a conditional application? What does “evidence of cooperation with criminal history background check” mean? Is this an attestation on the required Persons of Interest and Entities of Interest forms (not yet released) or something additional?

10. Is there a prohibition against a single, non-institutional investor being the financing source for multiple applications?

I’m writing to seek guidance on an apparent conflict between two different rules under N.J.A.C. 17:30 as it relates to transfers of licenses after their conversion from a Conditional License into an Annual License.

§ 17:30-6.8(k) states, “The **majority share** of the license applicant’s ownership interest, **including** the ownership interest that qualifies it as a diversely owned business, social equity business, impact zone business, or microbusiness **shall remain the same** from the date of submission of a conditional license conversion application or submission of an annual license application **until two years after the commencement of cannabis business operations.**” [asterisks added] However, § 17:30-9.3(a) states, “**From the submission of a conditional license conversion application* or an annual license application **to at least two years after the cannabis business commences operations**, a license-holder holding an annual license shall not make any change to **more than 50% of its ownership interest**.[.]*” [asterisks added]. Later in § 17:30-9.3(c) and (d), it states that 50% transfer cannot interfere with the Licenses Social Equity and/or Diversely Owned status.**

We are a bit confused by the above. § 17:30-6.8(k)’s language seems to be a blanket ban on a transfer of the majority share of the ownership interest of any license type during the first 2 years, which is de-facto 51%, but in section 9.3(a) it is specifically contemplated that an applicant could transfer a full 50% of their equity, even if originally a conditional license. Further, in section 6.8(k), the use of the word “including” would infer that the prohibition is not just applicable to the items listed, but to any defining feature of the application, including that 51% be controlled by a person that meets the Conditional Application requirements. However, again, 9.3(a) seems to specifically imply that we can make a change in equity up to 50% once the Conditional License has been converted into an Annual License, so long as such 50% transfer does not impact the entities ability to truly qualify as a Diversely Owned or Social Equity business (assuming it applied as one).

So our reading of § 17:30-6.8(k) in light of what § 17:30-9.3(a) seems to specifically allow is this:

As there does not appear to be any specific definition for “majority share” in 6.8 or elsewhere in the Rules, and 9.3(a) gives a specific % that is allowed to be transferred within the same 2 year period, a majority share under 6.8(k) is 50%, not 51%.

That the prohibition of a transfer in 6.8 that would interfere with a condition under which the original license was issued is only applicable to those listed, as § 17:30-6.8(k) does not include it and § 17:30-9.3 is specifically applicable to a converted conditional license and allows for such a transfer during the same 2 year period so long as that transfer does not interfere with the entities status as a Diversely Owned or Social Equity Business.

So, in accordance with the above, we believe that an Applicant who is awarded a Diversely Owned Conditional License based on the entity being MBE certified would then

		<p>be able to transfer up to 50% of the entity's equity under 9.3(a) so long as that transfer was to owners that were also minorities under MBE certification requirements. The new owner's incomes would no longer matter after the conversion. Are these correct statements?</p> <p>If not, how should 9.3(a)'s allowance of a transfer of up to 50%, unless it interferes with the 2 specified statuses, be interpreted given it is specifically including post conversion Annual Licenses?</p> <p>Any guidance here would be very appreciated. Thank you!</p>
Tanner Travers	11/22/2021	<p>NJAC 17:30-11.5 section d states that "Each package of finished cannabis product shall, for inhalable products, contain no more than ¼ ounce or 7.09 grams of usable cannabis or equivalent weight dependent on form" However, there is also a environmental impact plan for things such as sustainable packaging in the cannabis industry. It seems contradictory to set a small limit of 7.09 grams per package, this ultimately creates more packaging, waste, and increases a businesses carbon footprint. I am bringing this to the attention to the CRC so they may consider increasing the limit to 1oz or 28.34g. This will be in accordance with the Environmental standpoint that the state is making to reduce waste and carbon footprints within the industry.</p> <p>Thank you for taking our comment and have a wonderful night.</p>
Michael Cardona	11/25/2021	<p>Hello members of the committee</p> <p>First, I'd like to thank you the opportunity to comment in this meeting. My name is Michael Cardona, I will be applying for the conditional micro business license for a retail dispensary operation. I applaud all the social equity designations provided for small business owners and aspiring entrepreneurs that hope to enter the industry, my question is, will the Committee attempt to implement a Social Equity Cannabis Business Development Fund, similar to what Illinois is doing, many entrepreneurs and small business owners do not have access to the capital all of the Multi State Operators have and although there are regulations in place to keep most of the ownership in NJ, alot of experienced cannabis investors from out of state are predatory due to the infancy of our medical/recreational Marijuana programs, like they have been in newer states adapting the sale of Marijuana. I hope to keep all of my future business local as possible and strengthen our local ties to the communities either advantaged or disadvantaged with proper cannabis education and demonstrating the benefits of having a locally owned business.</p> <p>Thank you for your time.</p>
Matha Figaro	11/29/2021	<ul style="list-style-type: none"> - are gummies considered a chewable form? - where can we find access to grants, funding and financing? - what are the plans for expanding the types of accepted edibles? - will chewable manufacturing facilities be subject to the state health department ?
Stanley Daniels	11/30/2021	<p>Why has the sale of recreational marijuana not been inactive yet?</p>
Cheryl McDaniel	12/1/2021	<p>Is there an anticipated date to announce dispensary license awards from the August 2019 application process? Thank you.</p>
John Harmon	12/1/2021	<p>Chairwoman Houenou,</p> <p>The African American Chamber of Commerce of New Jersey is dedicated to sustaining African American communities and businesses through entrepreneurship and capital initiatives. It advocates and promotes economic diversity while fostering a climate of</p>

growth through education and policy initiatives. The chamber also works with state government to promote equity in hiring and procurement practices. Our work helps expand opportunities for minority and women-owned businesses across the state.

While we have seen opportunities expand over the last few years, we were disheartened to learn that some firms may be “gaming” the state’s procurement set-aside program. This not only deprives state residents of top-quality services but also deprives women and minority businesses of equal opportunity under the law.

Under state certification rules, a WBE or MBE must be at least 51% owed by a woman or minority. That individual must also have direct responsibility for the business’ operations. In the case of medical marijuana permits recently issued by the New Jersey Cannabis Regulatory Commission, several of the winning applicants in the Central Region may have improperly certified their businesses to gain an unfair procurement advantage. As a result, Curio Holdings NJ, the company that scored the highest technical and fiscal application scores in the region, was denied a permit.

Curio’s plan would create up to 100 local jobs, provide access to a \$30 million investment fund to help assist minority and women-owned cannabis dispensaries, and deliver more than \$100,000 in charitable giving to the Trenton community.

We ask the CRC to revisit its scoring process, verify the WBE status of the central region permit recipients and award the permits to the company that can best serve the needs of New Jersey residents and businesses.

Sincerely,
 John E. Harmon, Sr., IOM
 Founder, President and CEO

Christopher Deaney

12/2/2021

Please pass one of the bills on the table for Medical cannabis home grow. I cannot afford what I need each month and a few plants will help supplement what I need. I have no problem registering and abiding by guidelines imposed for homegrow. That being said not many people will be successful growing plants in general, so this most likely won't hurt the dispensary or the bottom line. I am a business owner and understand the concerns. Lowering Cannabis prices will surely help down the line. I understand the need for competition to lower prices and we will get there, but growing a few plants in the meantime shouldn't hurt anyone. Please help with with this issue in anyway possible. Thank You for Your time.

David Eckleberry

12/3/2021

As a legal marijuana patient (senior) on a fixed income with stage 4 cancer, how much longer do I have to wait to grow my own?

Thomas

12/3/2021

When or how can I see the upcoming agenda for the December 7th meeting?
 Thank you.

Jean Talleyrand, M.D.

12/3/2021

I am a Cannabis specialist physician. I have been evaluating medical Cannabis patients in California since 2003. I co-founded a nonprofit Cannabis research organization, the CESC, in 2015. The CESC sponsors research on the characterization and safety of community-accessible Cannabis products. The lack of study on marketed Cannabis products is concerning. It is particularly of concern to the patients who are using Cannabis for medical purposes. Most states regulate testing for content, toxins, and microbial. However, effective dosing and safety surveillance remains conspicuously absent. New Cannabis cultivars and products are common. Novel extraction methods and experimental formulations are created regularly. We propose that the Cannabis industry contribute to the further study of their Cannabis products. We propose that all state Cannabis commissions require third party product safety surveillance studies upon the release of novel Cannabis products. These studies are relatively inexpensive and can provide real world evidence for product safety and efficacy. The Dosing Project as an example of a effective safety surveillance study. Further information about the Dosing Project can be found on our website www.thecesc.org

Joseph Savino	12/5/2021	Will a class 5 retailer be allowed to purchase flower in bulk and package it themselves?
Dionne Carroll	12/6/2021	<p>Q1: Are the following forms only going to be available starting Dec 15th or will they be made available prior to the application period becoming open?</p> <p>Q2: If the following forms are only available during the submission process, will all persons of interest need to be present during the submission?</p> <p>Q3: Where can applicants find the following documents or shall applicants develop such themselves?</p> <p>Q4: If we need to develop such ourselves, shall we use the 2019 RFA Application Materials as templates?</p> <ol style="list-style-type: none"> 1. Form that all applicants will comply with fingerprint screening 2. Personal history disclosure forms 3. Affidavit that the statements included in the application are true and correct 4. Authorization to release all information pertaining to the license holder as requested by the Commission <p>Thank you all kindly.</p>
Venushki Hemachandra	12/6/2021	<p>Hi,</p> <p>I am writing to express my deep concern regarding the application process for Diversely owned businesses such as myself. From my understanding, it is a requirement to submit a certification from New Jersey Department of the Treasury’s Division of Revenue and Enterprise Services to be considered as a diversely owned business as per below: “The submission of the certification or certifications from the Division of Revenue and Enterprise Services, Department of Treasury, pursuant to N.J.S.A. 52:27H-21.20 and 52:32-31.8, proving the business has qualified as a minority-owned business enterprise, a woman-owned business enterprise, or a disabled veteran-owned business enterprise. Certifications from entities other than the Division of Revenue and Enterprise Services will not be accepted.”</p> <p>The CRC introduced the notice of application acceptance on Nov 9th, where the requirements for such certification was made clear. We, as a minority and woman owned business, applied for this certification from the Division of Revenue and Enterprise Services, but was told it will take 6-8 weeks to process and receive. The CRC is beginning to accept applications on Dec 15th. Since the requirements came out on Nov 9th, we are only given 5 weeks to apply for the certifications, which is not enough time for Diversely owned businesses to obtain this certification.</p> <p>I understand the CRC is looking to make this process as fair as possible, but this requirement of certification may be unfair to folks like us who may not receive this certification on time to be considered. Even though the process is on a rolling basis, there are limited licenses being offered for certain classes of licenses. Would the commission consider accepting proof of application submission, and the documentation submitted to the Division of Revenue and Enterprise Services, as sufficient to be considered a Diversely owned business? Otherwise, we are concerned that we will be overlooked, because we will have to wait until these certifications are received. I thank you in advance for your consideration on this matter.</p> <p>Kind regards, Venushki (Venus) Hemachandra</p>
Caitlin Fair	12/6/2021	<p>Chairwoman Houenou,</p> <p>I’m writing on behalf of the East Trenton Collaborative, a community organizing, and development initiative focused on engaging partners, businesses, and residents to make East Trenton a great place to live, work, and play. Vital to our success is business partners</p>

who are engaged in a meaningful way to improve the lives our residents.

Over the last three years, we have built a strong relationship with Curio Wellness and have found Curio be a committed partner to our region. That's why we support Curio Wellness' plan to operate an alternative treatment center in New Jersey. The firm's commitment to serving the economic, healthcare and community needs of our area is unmatched by their competition.

Curio has committed to a \$30 million woman and minority owned business enterprise fund and plans to hire up to 100 area residents. Curio has also committed to more than \$100,000 in donations to the Trenton community. In addition, Curio has plans to redevelop city-owned land allocating \$32 million of its initial capital to purchase land from the City of Trenton and construct a cultivation, processing and research facility in Trenton.

Unfortunately, Curio may be prevented from delivering on those promises thanks to a flawed permit scoring process that seemingly awards contracts to organizations whose credentials have not been vetted. In this case, the New Jersey Cannabis Regulatory Commission awarded permits to firms that may have inappropriately self-certified as women-owned enterprises.

We support Curio's request that the commission reevaluate the awards and investigate the WBE certification of permit winners in the central New Jersey region.

Thank you,

Caitlin Fair
Program Director
East Trenton Collaborative

Miko Green

Chairwoman Houenou,

The East Trenton Committee is dedicated to restoring and building unity in the community through information, community activities, neighborhood cleanups and more. We recognize that one way to achieve that goal is through supporting economic opportunities that benefit our city and region. That's why we support Curio Wellness' application to establish alternative treatment centers in Central New Jersey.

Curio's plan calls of hiring up to 100 full time workers, committing \$100,000 in annual contributions to city organizations and sponsoring a \$30 million women & minority owned business enterprise fund. Additionally, it would establish operations on land adjacent to our community.

None of this will come to fruition, however, if the commission allows the current award recipients to begin operations. If questions circulate about your permit scoring process and the WBE self-certifications of the winners, the community cannot be assured that the best firm is serving its needs not that the permit application process is fair. We encourage you review your scoring system and MBE certification process to ensure the best outcomes for our community.

Sincerely,
Miko Green
President

12/6/2021

Anne Cahalane

12/6/2021

I'm disabled. Access to cannabis is important to me and my health. Dispensaries are FAR. The product is expensive. My social security check doesn't even cover my

		mortgage and taxes. Can you allow home grown and lower medical Marijuana costs? It's a plant. Safer than alcohol. But so inaccessible. Please do better.
Dale Smith	12/6/2021	Treat all dispensaries the same. If you restrict one dispensary from taking tips, then restrict ALL of them. Or maybe allow tips at all of them since they make the same as fast food workers.
Laurie McHugh	12/6/2021	Is there any regulation regarding company names? Specifically, can the word 'cannabis' be used, example "Laurie's Cannabis Company" (fictitious name used as an example only)
Bryan Nesci	12/7/2021	<p>Hi first thank you for all your effort and hard work to get to this point. I had a few questions:</p> <ol style="list-style-type: none"> 1. When applications open there will be an option for a conditional license intended for a microbusiness cultivator? 2. On the CREAMM Act it states that mico cultivators are limited to 1000 plants. It doesn't clarify mature vs seedling. I have read other places on your website 1000 mature plants. Will this be amended as some towns are taking it as 1000 plants total. 3. If an application is rejected will you let the applicant know what needs to be amended or will the applicant have to resubmit? <p>Thank you!</p>
David Matis	12/7/2021	Companies that are “gifting” marijuana. Will they be barred from obtaining licensing? If so how will the CRC go about that.
Malcolm Morrison	12/7/2021	<p>What is the "service code" needed for the NJCRC to submit finger prints for the NJCRC upcoming date of 12/15/21, what is the needed "Contributor Case"? They are not listed in the Rules and Regs</p> <p>Thank you</p>
Nicole Elko	12/7/2021	I wanted to understand when the applicable disclosure forms will be available from the CRC for the 12.15.2021 and 3.15.2022 applications. Are we to use the forms on the website under the 2019 RFA for the ATCs?
David G. Evans, Esq. Senior Counsel CIVEL	12/7/2021	I will submit detailed written comments to your counsel about the warnings that should be provided.
Melissa Tasse	12/7/2021	90% of all addictions begin during adolescence. The more normalized and prevalent a substance is, the more kids and teens will use. We have learned SO much about how the alcohol industry, tobacco industry, vape industry market towards kids in an effort to get them hooked. We must apply everything that we learned from those addictive substances to marijuana. There is NO safe level for marijuana in a developing brain. And, the brain continues to develop until around age 25. You MUST not allow stores anywhere near schools, residences, parks, or anywhere that kids frequent. You must limit the potency! The pot of the 70s was roughly 3-4% and has been creeping up ever since until now it is not uncommon for a nicotine cartridge to be 50-75% and dabs and concentrates approach 99%! This is deleterious to the brain and absolutely irresponsible to even allow these products to be manufactured. We should NOT allow advertising, and storefronts should be simple and windows whited out so as not to entice those under 21. Seriously, take

		EVERYTHiNG that we learned about the other legal and addictive substances and simply grandfather those same regulations for THC. Do all that you can to protect the brains of the children, teens, young adults of New Jersey! Otherwise, more kids will get hooked and all of those pot tax dollars you think are a windfall will NOT be enough to cover the public health costs associated with kids using. As a mother and neuroscientist, I beg you to do the right thing by our kids!
Jason Bacon	12/7/2021	Hello, I would like to know if an applicant applying for a conditional microbusiness license needs to live in the municipality where the business will be located, or a bordering municipality at the time of submission of the conditional application, or if this requirement will only apply for an annual microbusiness license. Thank you.
M Botteon, M.S. IRHR	12/7/2021	<p>CRC needs to do damage control:</p> <ol style="list-style-type: none"> 1) none of the CBD or THC products to be sold are FDA approved which means there is huge liability for the CRC promoting their consumption and for determining how much CBD and THC should be allowed in these items. 2) CRC needs a plan for increasing NJ hospital burdens with respect to respiratory issues from pot use especially in consideration of Covid and its variants; 3) CRC needs to plan for preventing and mitigating environmental pollution from the marijuana industry - there needs to be zero tolerance for poisoning NJ watersheds and soil from any marijuana business; 4) There also needs to be zero tolerance for marijuana drugged driving - DREs are not enough - CRC needs to require marijuana testing anytime someone is seriously injured or killed in a vehicular accident; CRC needs to also facilitate a reliable scientifically accepted form of marijuana roadside testing; 5) CRC needs to put together a panel of professionals to rely on who are NOT entities that enrich themselves from the marijuana industry: including but not limited to AAA Automobile Assoc of NJ / NJ Law Enforcement / NJ Medical Society / The American Academy of Pediatrics / Non-profit NJ Environmental watchdog groups <p>Thank you so much for your consideration.</p>
Zoned Cannabis	12/7/2021	<p>My company Zoned Cannabis is assisting with application preparations I would like to know where the Personal Disclosure forms are? I would also like to know if applicants need to be residents as of the last two years of the date of application or at least two years as of the date of application ie someone who was born and raised in the state and then moved in 2016. We would like motions against the municipalities ability to charge for approval.</p>
Kristen Haas	12/7/2021	<p>Good evening to the commission and thank you for all of the work you have done so far in building the cannabis industry in New Jersey.</p> <p>My name is Kristen Haas and I'm the founder of The Botanica Boutique, a CBD business in Maplewood, NJ. I plan on applying for a microbusiness license in March to expand my business to a retail dispensary.</p> <p>I'm currently looking at retail spaces, but I would love to get some clarity on the regulations around food selling establishments and how close they can be to a cannabis dispensary. For example, I am looking in a strip mall type of building that does not have a food business on either side of the space I'm looking at, but there is a shop that sells juice a few stores down in the same strip mall. Would this be a problem in obtaining a license?</p>

Ken Wolski,
RN, MPA

Telemedicine & the Bona Fide Relationship in the New Jersey Medical Cannabis Program (NJ MCP).

The only requirement for an NJ MCP provider is to have a current DEA license and a physical practice in NJ. If multistate operators connect NJ patients to NJ physicians by Telemedicine, they are quite within their rights. It is not a violation of the MCP. If the physician/provider does not have a physical practice in NJ, then that is a violation of the program rules. However, the distinction that only NJ physicians may admit NJ residents into the NJ MCP is arbitrary and unnecessary. Patients in NJ are free to cross the river into NY and PA to obtain medical treatment from providers in those states. The prescriptions, and other treatments, from out of state providers are perfectly legal here in NJ. There is nothing special about NJ physicians that make only them eligible to admit patients into the NJ MCP.

Only about 1000 NJ physicians have bothered to join the MCP out of the 28,000 or so in the state. Even many of the physicians who joined the MCP are not committed to marijuana therapy, but they do it out of courtesy for their patients. There is precious little education about the Endocannabinoid System (ECS) in the physician community. When the Department of Health appointed the Medical Marijuana Review Panel, they published the curriculum vitae of the members. None of the members on that panel had any documented education, publications, or experience with cannabis, or the ECS. Admittedly, the Review Panel did an excellent job in the end, but their lack of education and experience going into that task was concerning.

Patients have told me some of the most shocking statements from NJ physicians. For example, numerous physicians have belittled, laughed at, or simply ignored patients' requests for cannabis therapy. One NJ physician told an impoverished, dying Hospice patient that if he wants medical marijuana, he should find another physician.

The bona fide relationship that is necessary in the MCP between a patient and a provider is an artificial construct. The original medical marijuana bill said that all a physician had to do to admit a patient into the MCP was attest that the patient had a condition that qualified to join the program. This could even be done by a review of the patient's records, without the physician seeing the patient at all.

The bona fide patient relationship is phony. When I go to see a doctor for medication or treatment, whether it's a GP or a specialist, I do not have to see that doctor more than once for treatment. I certainly do not have to see a doctor four times, or for any arbitrary length of time, before I can be treated. Moreover, with medical marijuana, these physician visits are almost exclusively cash out of pocket for the patient. A great many patients have been impoverished by their illnesses or injuries. Spending \$400 a year on physician visits, in cash, just for the opportunity to purchase a medical marijuana card, and then purchase very expensive medical marijuana, certainly strains the resources of many patients, and denies access to many more.

Many patients were greatly relieved when visits for maintaining an ID card in the MCP were reduced, at the discretion of the provider, to once a year.

Please join my call to require education on the ECS for all health care providers in NJ as a condition for continued licensure.

12/7/2021

I also hope you will support the bills currently in the NJ Legislature that create insurance coverage for medical cannabis, S3799/A5760 and A1708/S3406.

David Feder

12/8/2021

Hello. I was on the meeting and asked several questions which I will provide here as well:

1) Are there two gradings, one pass fail, and the other a different scoring? If so, where are the guidelines for that subsequent scoring matrix?

For example it appears that an applicant for an annual license is required to get a perfect score on each measure in order to obtain 210 points to get a license - does this pass/fail scoring precede a subsequent evaluation and more competitive scoring? If so, where is that scoring process?

2) May an Applicant apply as a corporation doing business as a tradename (i.e. a DBA)? If not, will businesses be able to change their tradename/brand? How?

3) Do the applications require someone who has lived in NJ for any 2 year period in their lifetime? Or does the applications require ownership by someone who has lived in NJ for two years immediately prior to the application? Same question regarding ownership by someone who has lived in NJ for at least 5 years. Does this require 5 years immediately preceding the application submission? Or does it suffice for the person to have lived in NJ for 5 years in their lifetime?

4) Labor agreement - for extra points the application requires the applicant to submit copy of the agreement with In-state, Out of state, Facilities and Associated project unions, However for the annual license the application requires the applicant to submit an Attestation from a labor union. So the question is, are annual license applicants not required to submit a copy of the agreement? Or must they submit the agreement + a separate attestation?

5) Fingerprinting - identigo- asks for a subscriber "service code" for the NJ CRC - and "subscriber case." Where can that be done?

Thank you very much for taking the time to consider these questions. With the applications being accepted moments away, I think it's critical to address these issues as quickly as possible, since they will have a massive impact on how people are structuring their businesses and agreements.

I look forward to hearing back from you.

David

Lincoln Gratton

12/8/2021

I'm sorry for not being live to submit my questions. I would like to know what will happen to businesses like budhub? Will they be able to integrate into the legal market? What does the timetable look like for legal smoke lounges and or vertical integration of all licenses for small business owners. Do conditional licenses allow you to vertically integrate all classes into one business? Please if i could have these questions answered that would put me a little further along with my cannabis dreams here in New Jersey. Thank you

Leeanna

12/8/2021

Is it requirement to have a labor union for staff and for construction?

James Rice

12/8/2021

Wholesale Distribution Licensing

Thank you Commissioners & Chairwoman. My name is Jim Rice and I spent close to 25 years in Beverage Alcohol the last 8 as a C Suite executive at a large Wholesale Distributor. I also currently own & operate a Cannabis Transport Business in Ohio. I would respectfully request the Commissioners consider increasing the number of Wholesale permits an entity may be issued from one to three. The primary and fundamentally unique business proposition a Wholesale Distributor can offer is the efficient and effective warehousing & logistics which require strategically located facilities throughout New Jersey.

It is both my personal & professional opinion that allowing a single entity to be permitted in Northern New Jersey, Southern New Jersey and along Jersey Shore will not only help the program achieve its Social Equity Goals but create a safer, more diverse and more successful Adult Use Cannabis market now and in the future.

It's important to note, of the states currently permitting Wholesale Distributors, which are California, Oregon, Washington, Colorado, and soon New York & Virginia NONE cap the permit number for Wholesale distributors. The reason why these states allow multiple Warehouse facilities is to create an efficient supply chain. This supply chain efficiency will benefit retailers by allowing them to carry less inventory, more selection, and increase product quality. It will also create a safer business environment as deliver routes will be shorter with drivers spending less time on the road, carrying less cash and less product.

Also, Edibles & Beverages are a massive profit driver for Cannabis businesses and are a safe alternative to ingesting smoke or vapor. Please consider including edibles in the New Jersey Program. Thank you!!!!