

**New Jersey Cannabis Regulatory Commission**  
**Public In-Writing Comments**  
**Public Meeting: January 7<sup>th</sup>, 2022**

Sender	Date	Comment/Question
Jill S. Zell	12/13/2021	I am a long-time patient in the MMP in NJ. Last year, I had COVID which left me with "long-haul" symptoms and I am unable to use cannabis in flower or vape form now due to ongoing lung/respiratory issues. I know that other states offer edibles (gummies, etc) but NJ does not. I completely understand that the concern of the public and of the Commission concerns the safety insofar as children mistaking these products for candy, but I feel the responsibility falls on adult consumers to practice responsibility of their cannabis products to minimize the possibility of these products falling into the hands of children. I respectfully request that the Commission consider making edibles available in NJ at some point in the near future for patients such as myself who find much relief from medical cannabis but have respiratory issues which preclude them from inhaling the products. Thank you in advance for considering my request and my concern.
Christopher Norman	12/15/2021	How will ATC's be required to transmit information on medical sales versus adult sales to municipalities and the Commission for purposes of determining collection of a municipal transfer tax? (Note: One or more ATC's currently have cultivation facilities located in more than one municipality).
Kathi Viola	12/20/2021	For consider at the Jan. 7, 2022 meeting. Please consider changing the pulldown link on the CRC webpage to read "Adult Use" instead of "Recreational Use." Recreational use suggests fun and lowered perception of harm and the legislation makes it legal only for those over age 21, which is an adult. Please consider this simple terminology change.
John Harmon	1/4/2022	<p>The meeting date is Friday, January 7, 2022 - the form has not been updated to provide 2022 date selections.</p> <p>Chairwoman Dianna Houenou New Jersey Cannabis Regulatory Commission</p> <p>Chairwoman Houenou, 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 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.</p> <p>While we have seen opportunities expand over the last few years, we were disheartened to learn that some firms may be “gaming’ the</p>

		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Sincerely,  John E. Harmon, Sr., IOM  Founder, President and CEO</p>
Miko Green	1/4/2022	<p>The meeting date is Friday, January 7, 2022 - the form has not been updated to provide 2022 date selections.</p> <p>Chairwoman Dianna Houenou  New Jersey Cannabis Regulatory Commission</p> <p>Chairwoman Houenou,</p> <p>The East Trenton Committee is dedicated to restoring and building unity in the community through information, community activities, neighborhood clean ups 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.</p> <p>Curio's plan calls of hiring up to 100 full time works, committing \$100,00 in annual contribution to city organization and sponsoring a \$30 million woman &amp; minority-owned business enterprise fund. Additionally, it would establish operations on land adjacent to our community.</p> <p>None of this will come to fruition, however, if the commission allows</p>

the current award recipients to begin operations. If questions circulate about your permit scoring process and the WBE self-certification of the winners, the community cannot be assured that the best firm is serving its needs nor that the permit application process is fair. We encourage you review your scoring system and the MBE certification process to ensure the best outcomes for our community.

Sincerely,  
Miko Green  
President

Caitlin Fair

The meeting is Friday, January 7, 2022 - the website has not been updated to include 2022 meeting dates.

Chairwoman Dianna Houenou  
New Jersey Cannabis Regulatory Commission

Chairwoman Houenou,

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

Over the last three years, we have built a strong relationship with Curio Wellness and have found Curio to 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.

1/4/2022

Thank you,

		<p>Caitlin Fair Program Director East Trenton Collaborative</p> <p>Cc:</p> <p>Dianna Houenou, Chair Sam Delgado, Vice Chair Charles Barker, Commissioner Maria Del Cid-Kosso, Commissioner Krista G. Nash, Commissioner</p>
Sean Jackson		<p>The meeting is January 7, 2022 - the website does not provide for date selection in 2022.</p> <p>Chairwoman Dianna Houenou New Jersey Cannabis Regulatory Commission</p> <p>Chairwoman Houenou,</p> <p>As a community-based organization that has spent forty years foster self- reliant families and healthy, sustainable communities in the City of Trenton, we know that viable cities require investment in education, jobs, infrastructure, culture and more. The state’s plan to license Alternative Treatment Centers in our region could infuse some greatly needed revenue into Trenton and its surrounding communities.</p> <p>We are pleased with the State’s plans for deploying Alternative Treatment Centers, but were disappointed to learn that the committee did not select Curio Wellness based on its high quality application. With its proven record and a strong history of effectively partnering with local organizations, Curio deserves the opportunity to operate in Trenton.</p> <p>Curio has made clear its commitment to the region, and that it would deliver a significant number of new jobs, make meaningful contributions in support Trenton organizations, and has proposed creating a novel “business enterprise fund” to assist local economic development efforts. Accordingly, we hope the Commission will reconsider its recent decision and afford Curio the opportunity to bring its services to Trenton.</p> <p>We are confident Curio will effectively and productively serve our community.</p> <p>Sincerely, Sean Jackson CEO Isles, Inc.</p> <p>1/4/2022</p>
Shani street	1/5/2022	<p>What can be done if a municipality is not accepting conditional license applications at all. They are only allowing people to apply for a</p>

		standard or micro business. I thought the whole focus for New Jersey was to make sure barriers were removed to help socially under privileged classes of people obtain licenses in this industry.
Justin Escher Alpert	1/6/2022	<p>What should a Safe Harbor for Personal Cultivation look like for those free citizens of The Garden State who will be responsibly exercising the natural and unalienable right this spring? How might they best secure equal protection of the law with responsible members of the craft brewing community?</p> <p>Does the New Jersey Cannabis Regulatory Commission have any plans to authorize retail sales for adult use this year, or should folks just continue to go to their regular connect?</p>
Cody-Ann Delbert	1/6/2022	Do applicants receive a copy of their application after submission? (Is there a PDF to download of the completed document).
Christopher Caruso	1/6/2022	I was hoping the commission could clarify the requirements for showing funding/investments on the application. Will I need to show on the application that I raised the necessary capital to open, or that I merely have a plan to raise the funding? Along with this, if after I submit the application, if I acquire a investor that will receive more than 5% equity in the company, how would I update this information with the CRC and the application process? Also could you please clarify, what types of investments/investors are not allowed be used for funding? Are out of state investors allowed to hold more than a 5% share in the company?
Nate Reed	1/6/2022	<p>I am writing in an attempt to gather more clarity on the following requirement: “(e) No cannabis business shall: 1. Display, on the exterior of the establishment, any advertisement for cannabis or a certain brand of cannabis product, except that a cannabis business may have external signage for purposes of identifying the building by the licensed name.”</p> <p>I have the following questions based on this regulation:</p> <ul style="list-style-type: none"> <li>• Are there any font or format requirements for the signage identifying the building by the licensed name? I.e. Could half of the name be in a much larger font size than the other half?</li> <li>• Can the signage identify only part of the licensed name?</li> <li>• Does the signage have to include “LLC” if the licensed name is a limited liability company?</li> </ul>
Mel Cruz	1/7/2022	Regarding site control for a microbusiness,can an individual business owner apply for a modification through zoning,to list a private residence for site control if they are confident that they can meet all requirements listed in the regulations? With limited financing options for real estate and grow limitations for microbusiness a smaller land footprint is more readily available than what is listed in certain municipal zoning plans for cannabis cultivation.Also,who would reach out to regarding municipal compliance and to gain more insight on the municipalities cannabis control prior to applying?.in clearer terms,who

		is the liason for cannabis compliance for each municipality?Thank you for your time and consideration.
James Miller	1/7/2022	<p>There is still no home delivery of medical cannabis in NJ over two and a half years after enacting a law to allow it. A representative of Curaleaf emailed me that Curaleaf has no plans to implement home delivery to patients due to the fact they are too busy gearing up for adult use sales. Would you be interested in seeing that email? I would think that you would be, considering patients still must continue to go out to a dispensary during the pandemic. Medical cannabis is still too expensive in NJ compared to other states. Curaleaf prices in Maine are considerably lower than what Curaleaf charges patients in NJ. Is that of concern to you? Please consider the obvious, that adult sales should subsidize patient prices to something affordable (\$75/ounce) when adults begin going through medical dispensaries to get their recreational weed. Why should adults be allowed to start with prices the same as patients? Patients patronized dispensaries for a decade to get prices to where they are today, not adult recreationally users. All things considered, I could make a case that NJ medical cannabis patients have been coming in second to NJ adult recreational concerns for over 3 years now. Is that of concern to you at all, or should patients realize that what I am saying is true and they have no real recourse?</p>
Piero Urteaga	1/7/2022	<p>I have been doing a little research on the NJ license laws and think I have a pretty good chance at receiving this license. Nj wants to give 25% of licenses to minority owned which I am qualified as and also state that if we are apply for a license in an “impact zone” or low income zone then I have a 15% chance higher of receiving the license. Apply for the license is fairly easy but one of my main concerns is the start up. starting up a microbusiness like this from nothing. no plan, no location, just a kid and a dream to help medical patients recieved the medicine they need.</p> <p>To tell you a little bout me now, I am currently 20, I have lived in New Jersey all my life. I am a Medical Marijuana patient and what got me wanting to open up a microbusiness is my mother. My mother unfortunately passed away this year on August First. I was very fortunate to have such a beautiful and caring mother. She adored and cared for all living things especially her plants. My mother was diagnosed with stage 4 Lung Cancer beginning of 2020. she didn’t undergo chemotherapy but rather a different route called target therapy. this treatment had a lot of side effects to it though. body aches for my mother, blisters in her mouth, sensitive feelings in her fingers. So to battle these side effects my mother always looked for other natural alternatives. Doing her own research she stumbled upon RSO or better known as Rick Simpson Oil. Unfortunately in New Jersey, this oil isn’t produced but there were other oils I was able to buy at dispensaries to help my mother. I believe this oils helped relieved a lot of pain she was having but never fully since I couldn’t get my hands on the RSO.</p> <p>Since the passing of my mother, i’ve felt as if i could have done more to help my mother feel better and because of this guilt i feel I would</p>

		<p>love to open up my own Microbusiness and help patients like my mother receive the medicine they need to feel better then every before.</p> <p>so my question is, once granted a conditional cultivation license what should be my next step of action after approval?</p>
Chris Goldstein	1/7/2022	<p>Good afternoon, Here are some additional details related to my comments during the meeting today.</p> <p>Thanks again, Chris Goldstein</p> <p>COVID 19 guidelines for medical marijuana dispensaries</p> <p>General concerns: New Jersey medical cannabis dispensaries were given "essential" status during the pandemic and allowed to operate during other business shutdowns. Two years later patients and caregivers experience a wide range of COVID measures. Some dispensaries take temperatures at the door, others operate tightly packed cues. Overall, dispensaries were slow to adopt full safety measures regarding COVID19. Today, many are running without enforcing social distancing and without barriers at the counter.</p> <p>Curbside pickups: Under emergency rules dispensaries are allowed to perform curbside pickup. In 2022 they have still not adopted the process, forcing patients and caregivers to walk inside facilities to pick up an order. For the last 2 years long lines of tightly packed people have been the regular sight at some dispensary locations like Bellmawr. This situation goes against all good sense of public health. Meanwhile newer dispensary locations like Bordentown only see only a handful of patients. Better coordination by permit operators with patients could alleviate some of the lines by, at least, sending them to a facility with less traffic.</p> <p>Public info about facilities: There has been no consistent public information about COVID19 infections among medical marijuana dispensary staff. That means patients and caregivers visiting these facilities have no information about potential contacts.</p> <p>Suggestions: Some immediate and rather simple actions can be taken to bring some uniformity to COVID safety at dispensaries. Protecting the health of those in the medical marijuana program, and the public at large, must be paramount.</p> <ul style="list-style-type: none"> <li>- Require proof of COVID vaccination to physically enter a dispensary; staff, patients, and caregivers.- Require dispensaries to operate a curbside pickup service to support all patients.- Require medical cannabis permit operators to log and report any staff with</li> </ul>

- COVID19; release that information to the public weekly or monthly
- Require barriers at the counters
- Strongly encourage dispensaries to innovate patient service to reduce lines and contact

Ongoing price concerns with medical cannabis

The NJCRC issued data last year covering the average price of medical cannabis. During 2021 that was \$320-\$480 per ounce. Currently these prices are out of reach for most working-class patients. The Commission has mentioned medical cannabis pricing many times, offering some hope of relief. Thank you for your focus on this important topic.

Still, NJ patients are utilizing many sources to gain full access to affordable cannabis therapy. The unregulated marijuana market and reciprocity with a few other states' medical marijuana programs can offer significant out-of-pocket savings for patients. In recent years there has been a remarkable consolidation of medical marijuana permits under a handful of national companies. In fact, some of the same corporations that operate NJ medical cannabis permits now operate dispensaries across the country.

Today, New Jersey patients can visit the websites for their dispensary and see menus across the national networks. For instance, CuraLeaf in Ellsworth, Maine has ounces of medical cannabis for \$75-115. That's half of the best price at their NJ locations.

Concerned this might be price gouging, I filed a complaint with the NJ Division of Consumer Affairs. Generally, when national businesses charge New Jersey residents significantly more than other states it raises flags and could prompt consumer protections.

The response from the division was interesting, "Unfortunately, New Jersey is not a price regulated state."

Indeed, NJ does not regulate the price of medical cannabis. Patients and consumers are left with few consumer protections, outside of this Commission.

In these comments, my hope is to simply keep NJCRC apprised of the ongoing and serious financial burden for patients trying to utilize dispensaries. Perhaps the Commission can schedule a listening session for registered patients and caregivers to discuss pricing and other concerns about the program.

We hope that legislators will take these concerns seriously as well. The hope is that one day New Jersey will regulate the prices for medical cannabis to prevent price gouging by permit holders.

Peter Barsoom

1/7/2022

Thank you for the opportunity to appear before you today. My name is Peter Barsoom and I am the co-founder of Liberty Plant Sciences with

Tricia Mueller. We are a certified Women Owned Business and scored in the top 5 in the North and South in the 2018 RFA. Your decision today is quite disappointing to the many other applicants who wanted to work with you to expand the Medical Marijuana Program in order to serve the critical needs of the tens of thousands of New Jersey residents clamoring for better access to this vital program.

There is immense patient need across our state. That's why, in 2018, the NJ DOH undertook a selection process to award ATC licenses as part of the State's Medical Marijuana Program. Later, the Appellate Division of the New Jersey Superior Court determined that the process was flawed and ordered the DOH to expeditiously correct the scoring problems.

They were right. Arbitrary processes like this, where qualified applicants are disqualified because of a flawed process, don't serve the patients, because it does not ensure that the most qualified applicants get the job but only those fortunate enough not subjected to a technical error. The same holds true for the applicants. Many of these applicants work for months and spend their savings on submitting an application, only to be denied based on a flawed process.

In its decision, the Court also specifically stated that the Department of Health had the legal authority to simply award licenses to the appellants who were affected by the scoring deficiencies, rather than go through an arduous rescoring process. Even under the faulty scoring process, Liberty Science was a top 5 applicant. The court found that we would have been even higher had the process not been flawed.

We have tried multiple times to sit down with you, the Commissioners, in order to introduce ourselves and resolve this issue amicably for the benefit of all New Jerseyans.. The courts have ruled in our favor. Being litigious is not our first course of action. We would prefer simply to get to work and help you expand this critically important program. simply want you to correct what the court has deemed a flawed process. To continue down a litigious road will only cost taxpayers even more in legal fees and will delay providing much needed patient care to the New Jerseyans who need it most.

The Commission has the opportunity to expand this program. It's at our fingertips. Yet your decision today will create more delay, more cost and more confusion – needlessly.

The Court has made clear that the Department of Health, and by extension the Commission, may legally grant relief in this matter and award licenses to the appellants. There is no question that awarding licenses to the 2018 appellants is authorized and legal to do.

Further litigation does not make any fiscal sense and only denies expanded access to the tens of the thousands of New Jerseyans who still lack critical access to a program that the legislature authorized years ago.

The Commission has the opportunity to turn the page and we stand ready with you to do that. You should not waste resources fighting the Court's decision and defending a flawed process that was designed before the Commission came into existence. We should not be penalized because we urged the Court to act, thereby improving a flawed process and making it better and more equitable.

		<p>Instead, we should work hand in hand to expand this critical program and ensure expanded access for every single New Jerseyan who needs it. We are ready to meet the growing needs of patients in New Jersey immediately.</p> <p>I respectfully urge you to review the Court’s decision and, especially, to heed its suggestion that you remedy the deficiencies in the Department of Health’s scoring process by awarding ATC licenses to the 2018 applicants who were needlessly harmed by the process. By denying us, it is the people of this state who continue to be harmed. Thank you for your time today.</p>
James E. Jackson III	1/10/2022	<p>My name is James Jackson and I am a current resident of West Orange and CEO of Yerrr Canna LLC—a company in the process of applying for a Class 1 Cultivation Micro-license in West Orange. My goal as a business owner is not only to operate a successful cultivation facility but to teach others how to do the same via my personal experience. I’ve been involved in the cannabis industry since 2011 after graduating from Howard University. I received a certification in Horticulture &amp; Cultivation from Oaksterdam University, assisted cannabis companies by providing financial and insurance services and built the cannabis practice at AON, one of the largest global insurance firms in the industry. I’ve also testified on the state level in New Jersey advocating for an equitable cannabis industry where I, along with other advocates, were successful in laying a foundation for social equity policies on the statutory and regulatory level.</p> <p>I would be remiss if I didn’t take a moment to reach out and voice my concerns and comments regarding process to receive zoning approval and local support. As a Class 1 Cultivation microbusiness Applicant and a resident of West Orange I am limited to the choice between three (3) municipalities as a host city due to statutory restrictions. Those municipalities would be West Orange, Orange, and East Orange. Unfortunately, none of these municipalities have successfully passed a cannabis ordinance outlining the requirements for local approval and zoning approval. As such, we have not been able to obtain the approvals necessary for an annual license. Due to the requirement that “At least 51% of the total number of persons included in the microbusiness license applicant or license holder, including all owners, principals, and employees, shall be residents of either the municipality in which the microbusiness is or will be located, or of a municipality directly bordering such municipality, at the time of the application,” my team is limited in options and we are forced to wait for these municipalities to act. My concern is that the window to apply will close before we receive our requisite approvals, simply because municipalities failed to act in a timely manner.</p> <p>I respectfully request that CRC take this municipal issue into consideration when deciding when to close the cannabis application window for Class 1 Applicants and request that the application window remain open past March 15th to allow Applicants to receive the appropriate approvals. I understand you receive a lot of comments and questions, but I hope the CRC understands that I’ve been working</p>

towards this for years and I hope that by virtue of these comments I can gain some clarity or certainty so that I can continue moving forward. If anyone has any questions, please let me know. I am happy and willing to be a resource for the CRC.

Best,

James E. Jackson III  
CEO & Founder  
Yerrr Canna LLC