

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: February 15, 2024

Full Name	Meeting date	Comment
Marcel Rodriguez	2/15/2024	<p>Good afternoon, my name is Marcel Rodriguez, the owner, and founder of Wee Shop LLC in Somerset, NJ. Since 2019, I've been an entrepreneur, experiencing rapid growth with my first retail business in Woodbridge Mall. Fortunately, this success allowed me to open another location in East Brunswick Mall shortly after. Both locations were thriving, and the opportunities opened by the Hemp Farming Act of 2018 enabled me to offer high-quality products.</p> <p>However, like many small business owners, COVID-19 dealt a devastating blow. I was forced to close my doors, losing inventory and the momentum I had built. Despite these setbacks, my strong relationships with both mall locations allowed me to recover some inventory and begin rebuilding with limited funds. Giving up was never an option; being an entrepreneur is ingrained in me. My innate skills and the support of a welcoming community propelled me forward.</p> <p>Finding a building available for immediate occupancy, I seized the opportunity and poured everything into making it work. Though I lost my apartment, had my car repossessed, and even slept in hotels with my kids, I remained determined. This business, a passion since I was 10, wasn't about to vanish. As a cannabis patient myself, I knew how to excel in this role and offer exceptional service to fellow patients. "Why not me?" became my driving force.</p> <p>Equipped with extensive industry knowledge and a deep understanding of customer needs, I earned all necessary certifications and opened my doors in Somerset in June 2020. Even at the height of the pandemic, I took a calculated risk, believing in myself when few did.</p> <p>When the CRC application window opened, I meticulously filled out the forms with my lawyer's thorough review. Since then, I've eagerly awaited the CRC's response, having received</p>

		<p>neither approval nor denial. My legal counsel clarified that my application is undergoing additional review to confirm my minority business ownership status. I am here today to introduce myself to the committee, provide any further information required, and confidently prove that I am, indeed, a minority business owner.</p>
Aaron Burgard	2/15/2024	<p>Given states like Colorado have a strong level of information open to the public. What is the NJCRC doing to keep up with the transfer of information as a whole to the public? As an analyst it is disheartening that I have to gather data from out of state to further research on how our legalization of cannabis could possibly impact our local communities. Many of the current information obtainable by the NJCRC is under detailed, missing, or has not been continued. If we want the community to help further NJ cannabis, we need more information!</p>

		Thank you for the time taken to read this comment.
Abigail Kalmbach, PhD	2/15/2024	<p>Public Statement given at CRC Meeting on February 15, 2024</p> <p>Good afternoon Members of the Cannabis Regulatory Commission. Thank you for all of the work you do to ensure our state continues to develop an equitable and robust regulated cannabis market place.</p> <p>My name is Abigail Kalmbach and I come before you as a medical cannabis patient and a member of the Coalition for Medical Marijuana New Jersey (CMMNJ) and scientist. I am here to speak about two things: the need to increase accuracy of laboratory testing of cannabis for safety and the need to finally implement 3 last provisions of the Jake Honig Compassionate Use Act.</p> <p>One of the biggest advantages of a regulated cannabis market for patients and consumers is assurance that the products we buy have passed rigorous safety testing on representative samples from each batch of flower grown or product manufactured. I am here today to urge the Commission to increase the frequency of testing cannabis flower to ensure representative and effective testing, which will ensure increased accuracy for cannabinoid and terpene profiles as well as catching any contaminants that may be present. The easiest way to increase accuracy of testing is to reduce batch size – at New Jersey’s current batch size, our state is double the size of any other legal market, and nearly 7 times the size of the most common state batch size. What is even more striking, however, is that while NJ has literally copied Maryland’s testing regulations during this interim period of writing our own, with only a change or two, including: instead of 10lb batch sizes that Maryland has: we have 100lb batch sizes. Why do we trust Maryland’s testing lab regulations for most everything else except for batch size?</p>

The huge batch sizes in our state make a mockery of any assumption that representative samples can accurately reflect the entire batch. The 100 lb batch rule gives financial advantage to larger ATC cultivators, because they don't have to test as frequently as smaller cultivators. Most importantly, however, the huge batch sizes hurt the patients and consumers as moldy and toxic products cannot accurately be detected. It is unfair to push the risk of mold onto patients and consumers, particularly since we cannot even visually inspect their product for mold prior to purchase.

Switching gears more fully to patients, I want to ask the Commission's members what the timeline is for fully implementing provisions laid out in the Jake Honig Compassionate Use Act. Patients are still waiting for access to their cannabis medicines in hospitals. I know patients who have risked their lives by not seeking medical treatment because they are unable to continue use of their cannabis-based seizure medicines while in the hospital. This Act was passed in 2019 and since recreational cannabis came on the scene a year later, it seems like everyone has washed their hands of it. Yet we still need to set up: Institutional caregivers; Dosing and administration guidelines; and Educational Programs for doctors and nurse practitioners. These educational programs are particularly needed because less than 2% of doctors in NJ are licensed to prescribe cannabis medicine. Perhaps because they lack educational material and institutional support. Please advise on how we can implement these important provisions so that medical cannabis patients can access their medicines from informed practitioners.

Thank you for your time today.

Abigail Kalmbach, PhD

<p>Ken Wolski</p>	<p>2/15/2024</p>	<p>The Coalition for Medical Marijuana New Jersey (CMMNJ) supports the need to increase accuracy of laboratory testing of cannabis for safety, and the need to finally implement three provisions of the Jake Honig Compassionate Use Act.</p> <p>One of the biggest advantages of a regulated cannabis market for patients and consumers is assurance that the products we buy have passed rigorous safety testing on representative samples from each batch of flower grown or product manufactured. Unfortunately, the huge batch sizes in our state call into question any assumption that representative samples can accurately reflect the entire batch. The analytical tests use a fixed amount of sample - less than 0.04 lbs. that is taken from a mixed-together bag of sampled product. According to regulations, 0.5% of the batch weight must be taken in a series of sample increments. So for a 100 lb. batch, the sample increments add up to 0.5 lb., but less than 9% of this collection of samples is utilized in the tests. When the batch size is 20 lb. and the sample increments add up to 0.1 lbs., over 44% of the sample is utilized in the tests. Thus the likelihood that the analytical tests more accurately represent the representative sample goes up five fold.</p> <p>With New Jersey's current batch size of 100 lbs., our state is double the size of any other legal market, and nearly seven times the size of the most common state batch size. What is even more striking, however, is that while NJ has literally copied Maryland's testing regulations during this interim period of writing our own, we have made at least one change: instead of 10 lb. batch sizes that Maryland has, we have 100 lb. batch sizes. Why do we trust Maryland's testing lab regulations for most everything else except for batch size?</p> <p>The 100 lb. batch rule gives financial advantage to larger ATC cultivators, because they don't have</p>
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		<p>to test as frequently as smaller cultivators. More importantly, the huge batch sizes hurt the patients and consumers as moldy and toxic products cannot accurately be detected, nor cannabinoid/terpene profiles accurately reported. It is unfair to push the risk of mold onto patients and consumers, particularly since we cannot even visually inspect their product for mold prior to purchase.</p> <p>Switching gears more fully to patients, we want to ask the Commission’s members what the timeline is for fully implementing provisions laid out in the Jake Honig Compassionate Use Act. Patients are still waiting for access to their cannabis medicines in hospitals. We know patients who have risked their lives by not seeking medical treatment because they are unable to continue use of their cannabis-based seizure medicines while in the hospital. We know patients who must go back to opioids for pain relief in the hospital and risk relapse when they cannot access their cannabis medicine. This Act was passed in 2019 and since recreational cannabis came on the scene a year later, it seems like everyone has washed their hands of it. Yet we still need to set up: Institutional caregivers; Dosing and administration guidelines; and Educational Programs for doctors and nurse practitioners. These educational programs are particularly needed because less than 2% of doctors in NJ are registered to recommend cannabis medicine. This is partly because they lack educational material and institutional support. Please advise on how we can implement these important provisions so that medical cannabis patients can access their medicines from informed practitioners.</p>
<p>Ian M. Dumain (as General Counsel of Cyrulnik</p>	<p>2/15/2024</p>	<p>Regarding the Commission’s consideration of the for-profit conversion and sale of Harmony Foundation of New Jersey, Inc., to Illicit Cannabis New Jersey LLC, and further to our firm’s prior notices to the Commission (dated Nov. 2, 2023 and Jan. 18, 2024), any such sale or transfer</p>

<p>Fattaruso LLP)</p>		<p>transaction must comply with the Jake Honig Act’s requirement that “all debts and obligations of the nonprofit entity are either paid in full or assumed by the for-profit entity purchasing or acquiring the permit, or a reserve fund is established for the purpose of paying in full the debts of the nonprofit entity.” N.J.S.A. 24:6I-7(k)(1). As noted in our firm’s prior letters, Harmony Foundation owes a substantial outstanding debt to Cyrulnik Fattaruso LLP, and any resolution approving a sale or transaction must, as a matter of law, require full repayment of the debt, establishment of a reserve fund to pay the debt, or assumption by Illicit Cannabis New Jersey LLC. To the extent that the Commission approves the transaction without compelling prior repayment or establishment of a reserve fund, we understand that Illicit Cannabis New Jersey LLC will have knowingly and voluntarily assumed Harmony Foundation’s debts and obligations to Cyrulnik Fattaruso LLP, by operation of N.J.S.A. 24:6I-7(k)(1).</p> <p>Cyrulnik Fattaruso LLP</p>
<p>David Little</p>	<p>2/15/2024</p>	<p>Presented at the CRC Open Comment Session 2-15-24</p> <p>My name s David Little, Managing Member and Chocoprenuer of Inclusion Gourmet, LLC. I’d like to thank the CRC for our Processor license received last Fall .</p> <p>Inclusion Gourmet, and our Jersey Canna brand is an FDA, FISMA registered, GMP certified, 30 year confectionery lab with nutraceutical background and a specialty in chocolate. Having always been in New Jersey, we also have 30 years of FDA and NJ Health Department inspections</p> <p>Coincidentally February is National Choc Month and Valentines Day, so let’s discuss chocolate and processing:</p>

		<p>A review of the CRC actual licensed manufacturers reflects only four processors operating– with only Inclusion Gourmet as an edible manufacturer. Here’s a quick explanation of how we make one product- we start with 10 of these 11lb bar [5,000 grams] and some oil [say 100 grams], and use very sophisticated machinery. With our 30 years experience we are able to correctly homogenize, get Independent Lab certification and create a 3 gr finished product containing only 10 milligrams of THC in each one. Perhaps the commissioners haven’t see this live – so inside February’s NJ Monthly magazine {SEE MAGAZINE ARTICLE SEPARATELY}there is our article with more information. I’ve given each of you an issue with one Golden Ticket as admission to tour our Cannabis Confectionery Lab and Factory. {SEE EACH CRC’S GOLDEN TICKET SENT SEPARATELY}</p> <p>Ingestible manufacturing requires expertise, expensive equipment, trained chefs and formulation background.</p> <p>Therefore, I’ d like to make some simple and easy suggestions for the CRC.</p> <p>1. First, an area which I would like to assist in is the designing of a faster product approval process. By you forming an advisory committee with a cross section of experienced companies in processing, retail and cultivating we can help advise the CRC on streamlining related regulations and procedures. For product approvals a system could be modeled after the NJ Alcohol Beverage Control’s Possee Product & /Brand Registration and Renewal online form.</p> <p>2. Second, I know others will discuss the need for quicker onboarding. I am a director for the Passaic County Community College Culinary program and train their students as interns. The system for employees as it stands now is too complicated. I suggest there be an easier way, even a “carve out” for interns and trainees. I</p>
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believe you are addressing that.

3. Third please request that Wesley White, create and maintain an actual database of CRC licensed entities with contact info, making it only available to those listed so we can communicate and share best practices.

4. Lastly, I encourage the creation of a CRC Ombudsman who works directly with private, independent licensees to assist their interactions with the CRC. This could function similar to the New Jersey Business Action Center. We need a focused contact who can go to bat on our behalf. The inspectors have too much on their plate and are not that familiar with many of the hurdles we face.

I look forward to assist in making NJ a model Cannabis program. As that jersey guy Frankie Valli might croon—"Lets Hang On To What We Got, We've Got a lot."

Thank you for your time.

Respectively Submitted:

David Little

David Little, Managing Member & Chocopreneur
and the team at Inclusion Gourmet LLC

Austin Edwards	2/15/2024	<p>1. Reinvestment of Cannabis Revenue:</p> <p>We support the immediate and significant reinvestment of cannabis tax revenue into communities disproportionately impacted by the War on Drugs. These funds should be directed</p>

		<p>towards:</p> <p>Community Reinvestment: Investing in initiatives that address the social, economic, and health disparities faced by Black communities, such as education, access to quality healthcare, job training, and violence prevention programs.</p> <p>Small Business Support: Providing targeted grants, loans, and mentorship programs to empower Black entrepreneurs to participate meaningfully in the cannabis industry.</p> <p>The CRC gives priority to applicants with cannabis related convictions, as well as those who come from communities disproportionately harmed by the war on drugs, still New Jersey has few Black owned dispensaries. Black women, in particular still experience trouble entering the market. There should be significant investments made in programs that will educate individuals from disadvantaged communities to learn more about operating a cannabis business. States such as Massachusetts have established free social equity programs that provide training and resources in entrepreneurship, management, reentry and entry level workforce development that serves as a strong model of the efforts we could be duplicating in New Jersey.</p> <p>2. Accessibility:</p> <p>One of the reasons many operating marijuana businesses continue to underrepresent certain groups is because of the challenges around funding. Challenges around funding include:</p> <p>Struggles with accessing loans due to the fact that marijuana remains illegal federally. The inability to access loans means that many business owners are left to seek out investors to access start-up capital, which comes with its own significant challenges.</p> <p>There is a lack of available real estate as many</p>
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