

New Jersey Cannabis Regulatory Commission  
 Public In-Writing Comments  
Public Meeting: September 19, 2024

Full Name	Meeting Date	Comment
Sheridan Doan	9/19/2024	Are New Jersey companies with a manufacturing license that produce edibles required to follow the same requirements as food manufacturers outside the regulation of the CRC? If so, does the company's standing with these governing bodies effect their standing with the CRC?
Cheryl Hough	9/19/2024	<p>Soon after retiring from Teaching secondary Art I was disabled by Diabetic Gastroparesis, a poorly understood condition afflicting mostly older women. I suffer from disabling nausea that is to the degree that my ability to eat, sleep or carry out activities of daily living is disrupted. After treatment by several Gastroenterologists who prescribed "supported" drugs like Zofran and Reglan that were ineffective or had intolerable side effects, I turned to Dr. Parkman, Director of the GI Motility Laboratory at Temple University Hospital and Vice Chair of Research, Lewis Katz School, Temple University. Dr. Parkman prescribed Domperidone, (not available in the US which can be prescribed with investigational new drug clearance from the FDA for GP but was NOT covered by insurance).</p> <p>Dr. Parkman prescribed the Cannabinoid Dronabinol which is discontinued and no longer available by prescription (was \$10 copay) so I am forced to rely on the NJ medical cannabis program for 10 mg. THC capsules at \$120 a month. Dr. Parkman also has prescribed Cannabidiol which is only available by prescription as Epidiolex through CVS Pharmacy for a \$40 copay which I must supplement with CBD gummies from the Dispensary when needed. It seems all of the medications that successfully treat my Diabetic Gastroparesis are off schedule. So I spend over \$1000+ a month at the Dispensary for Cannabinoids that are NOT COVERED BY INSURANCE!</p> <p>Nothing like retiring disabled thinking your teacher's health insurance has you covered and finding your disability is too weird to be covered.</p>

Reginald Green	9/19/2024	<p>My name is Reginald Green, I was born in Newark, New Jersey, and around the age of 7 years old my mother moved to Jersey City, New Jersey, where the majority of my life I was raised. Around the age of 18 years old I started selling marijuana to have extra money, help feed myself, buy clothes, and help pay the bills especially "PSE&amp;G" because we were a super poor family financially being raised by single Mother who did the best she could with four children me being the youngest of four.</p> <p>So, I would travel to New York City, to the movies on 42nd Street after the movies I would go Uptown via Manhattan which earned the nick name "Money Making Manhattan" back in the 80's. I consider Jersey City to always be the 6th burrow because the only thing that divided our Cities was the Hudson River. I would travel from Jersey City by 99S bus or the Path Train to go and purchase marijuana from the dealers on the streets of New York City Manhattan.</p> <p>During the years of 1986 through 1994 most of the marijuana sold in Manhattan between 110th Street and 145th Streets was sold by dealers from Jamaica or of Jamaican descent. I would seek out to find the best marijuana in that 35 blocks radius of New York City, Manhattan that I could find. Uptown, New York City officially became my own personal wholesale marijuana market place.,</p> <p>I knew most of the dealers with the good stuff with the best prices, it was good simple business, excellent quality products for great prices. In New York City basically Manhattan, the marijuana dealers would sell the bags of marijuana for \$5 per bag(called a nickel bag) and for every 20 nickel bags that I would purchase the dealers would give me three additional bags, as an incentive (to stay loyal to him) yes three extra bags per hundred dollars spent! Can you imagine that now, LOL 😊 just kidding. Nevertheless, me being a young 18 year old entrepreneur figured out a way to create a retail market in Jersey City with this Marijuana product. I started selling the same \$5 (nickel bags) that I would purchase from New York City, for \$10 dollars (dime bags) in Jersey City creating me a \$5 profit per bag sold. I called it flipping my money 💰! I had no overhead, no packaging cost, no employees, so I made a huge profit on my return from my investment. One of my favorite people Albert Einstein once said "your imagination is your preview of life's coming attractions." I literally imagined this day in 1988 marijuana being legal.</p> <p>My marijuana business became so popular and profitable in Jersey City that when regular people I knew with excellent 9-5 jobs, who needed extra money to pay their bills, their car note, their car insurance, a vacation, and anything thing else they</p>
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		<p>criminalization during cannabis prohibition. Our aim is to do this through two primary initiatives:</p> <ul style="list-style-type: none"> <li>* the prioritization of social equity businesses in the cannabis business licensing process, and</li> <li>* the investment of tax revenues raised from cannabis sales into communities negatively impacted by cannabis prohibition.</li> </ul> <p>“It is an essential aspect of the Commission's work to help repair the damage done to people and neighborhoods” that were marginalized and subjected to mass criminalization during cannabis prohibition.</p> <p>The statement above should be honored and respected by the New Jersey CRC, if you are really trying to “repair the damage.” The CRC terminating me from the New Jersey Cannabis Industry Program after the approval of the badge in March of 2024, and literally after two and a half months of employment due to very old 30 &amp; 12 years ago convictions is grossly unfair and absolutely erroneous. It’s definitely signaling that the CRC is not standing on its own merits when it comes down to employment, licensing, and repairing the damage done in Black and Brown neighborhoods due to the War on drugs.</p> <p>I would respectfully like the CRC to please reconsider reinstating my employee badge effective immediately in order for me to work in the Cannabis Industry, make this right for God sake! I’ve lost my employment, my apartment, and my vehicle due to this matter, but I haven’t lost my faith in humanity yet.</p> <p>I would like to say thank you very much in advance and I look forward to your upcoming response soon.</p> <p>Sincerely and Respectfully, Mr. Reginald Green</p>
Karl Szymanski	9/19/2024	<p>Dear CRC,</p> <p>I hope you're doing well. My name is Karl, and I’m the owner of Szymanski Family Farms. We have been proud participants in the NJ Hemp Program since its inception, and it has been a major source of success for our farm. The income we generate from hemp cultivation and CBD product sales is our primary means of supporting my</p>

		<p>family and the local community.</p> <p>Through this program, we've been able to provide affordable, locally sourced medicine to sick patients who rely on our CBD products. Without this, many people would lose access to critical treatment options.</p> <p>Right now, we have an entire year's worth of product ready, and without a clear pathway to sell these CBD products in Class 5 cannabis retailers, all of it would go to waste. We've already started harvesting this season's crop, to which we've dedicated 25 hours of work each week to, along with significant capital invested in supplies. Losing the ability to sell these products would not only hurt our livelihood but also the community and patients we serve.</p> <p>We urgently request a pathway to sell these products and for those of us in the NJ Hemp Program to be grandfathered into the METRC system to streamline compliance and avoid product loss.</p> <p>I ask you to please consider the impact on our farm, our family, and the broader community that depends on us.</p> <p>Thank you for your time and consideration.</p> <p>Sincerely, Karl Szymanski Szymanski Family Farms</p>
Todd Johnson	9/19/2024	<p>Good afternoon Chair Houenou, Commissioners Del-Cid Kosso, Nash, Delgado, Barker, and Director Riggs. My name is Todd Johnson and I serve as Executive Director of the New Jersey Cannabis Trade Association. Our membership is comprised exclusively of CRC licensed cannabis businesses operating in New Jersey.</p> <p>Today, I am providing comments on the Social Equity Excise Fee for 2025.</p> <p>First and foremost, I want to express the NJCTA's support for the CREAMM Fund which is where SEEF generated revenue is deposited until the Governor and Legislature disperse funds to social equity initiatives throughout the state. Our Association</p>

		<p>wholeheartedly supports these funds being used to help right the wrongs of the failed war on drugs and we are eager to see the positive impact these funds and associated initiatives have on impact zones and underserved communities of color.</p> <p>The concern I highlight today is the negative impact an increased SEEF could have on operators. The current SEEF is \$1.24 per ounce. For next year, you have the authority to set the SEEF at any level up to \$30 per ounce.</p> <p>The SEEF is charged directly to adult-use cultivators, a cohort of licensees that have faced significant challenges given the capital intensive nature of operating a cultivation facility. Increasing the SEEF by over two thousand five hundred percent will increase costs for cultivators astronomically and send a shock wave through the entire supply chain. Cultivators will have to raise their wholesale prices to offset the increased cost. Manufacturers and retailers will, inevitably, be forced to raise prices of cannabis products sold to consumers.</p> <p>A positive trend we have witnessed over the past 18 months is the steady decrease in retail prices of cannabis. But make no mistake, a drastic increase in supply side taxation will reverse this trend. Raising the SEEF to \$30 per ounce will immediately cause average wholesale prices to increase 15%. This could lead to retail prices in 2025 surpassing \$375 per ounce, causing frustration directed at the SEEF, and driving consumers to look for cannabis that are less expensive, and also less safe, from the unregulated market.</p> <p>Over the last two years, 22 cultivators and over 100 dispensaries have opened. The vast majority are independent operators and, based on the Commission's own data, 16% qualify as social equity and 71% as diversely owned. The Commission is dramatically exceeding its goal of having producers reflect the diversity of our State. But a drastic increase in the SEEF will directly impact these very same licensees at a time when many are struggling to simply stay afloat during the difficult early days of any new venture's operations.</p> <p>NJCTA's recommendation and request is that, for 2025, the CRC determine the desired revenue for the CREAMM Fund and calculate the SEEF rate that will achieve</p>
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<p>Andrea Raible</p>	<p>9/19/2024</p>	<p>Once again the legislature has dumped a problem in the lap of the Commission. The Intoxicating Hemp Bill was posited for public safety, but the reality is this legislation puts patients and compliant hemp providers at risk. While I understand the need for regulation (especially regarding synthetics), it must be understood that the interruption to the supply chain of safe, compliant, full spectrum CBD products is more than a business concern - this is a safety concern for patients who rely on these products for their treatment and quality of life. Full spectrum CBD products are used to treat a variety of conditions, and full spectrum CBD has helped me personally survive epilepsy while the legal cannabis market repeatedly proves inadequate. Maintaining the ability to control my intake ratio of THC to other cannabinoids is crucial. CBD isolate only provides a fraction of the efficacy as full hemp extracts. Full spectrum products such as RSO and tinctures are a necessity for many patients. Denying all legal access to essential medication for the foreseeable future is an unacceptable step in the quest for regulation.</p> <p>The medical patients have been asked to show patience for the recreation market time and time again. We remain at risk under the "temporary" 100 pound batch size (over 2 years), we still lack hospital access (Jake Honig Compassionate Care Act - over 5 years now), patients receive lower limits and stricter punishments than recreational consumers, no publicly posted COAS, no home grow, or even the decency of solvents labeled on packing... The medical program is in a stranglehold and now it is only getting harder for patients to survive this state.</p> <p>I urge the commission to do everything in your power to streamline a way for our compliant hemp farmers to sell the products our patients are depending on.</p>

		<p>The Intoxicating Hemp Bill not only took our access to full spectrum CBD medicine but it will be taking resources away from the medical program. The Commission is expected to oversee the new liquor store licenses though they were provided no additional resources. The bandwidth required to initialize a new license category or program of that scale is not to be underestimated.</p> <p>There are more liquor stores in NJ than doctors registered to prescribe cannabis.</p> <p>I understand liquor stores might be eager for the new infused drinks, and producers might be thirsty for newly expanded shelf space- but I ask that they demonstrate a fraction of the same patience that is required of the sick and dying waiting for affordable access to safe medicine.</p> <p>Unfortunately, the time has come to show the state who you are as people and as a commission.</p> <p>You are being forced to decide if you are going to prioritize the expansion of business interests, or if you are going to fight for the long unfulfilled promises to patients and stand up for the compliant hemp farmers. This is the time to reflect on your code of ethics. This is the time to take a leadership role. Please help the patients and the farmers.</p>
Reginald Green	9/19/2024	<p>Good afternoon, my name is Reginald Green, and I'm a former employee of Accend Wellness Holdings, and my job was a cultivation technician and here's my story. On Sunday, July 30th, 2023, I attended an expungement / hiring event sponsored by Accend Wellness Holdings, Blaze Responsibly, and had the pleasure of meeting Kyle Page who ultimately interviewed me and has become a great friend.</p> <p>While at the expungement event July of 2023. I met with Attorney Chirali Patel a phenomenal human being, with a heart of gold, I nicknamed her the "Angel of Law" because her expungement costs and fees are always "free 99." For everyone! Attorney Chirali Patel, started the process with great passion to help me get my my criminal record expunged.</p> <p>During the expungement event I was able to obtain information about employment with Accend Wellness Holdings as a cultivation technician</p>

		<p>I applied for a cultivation technician position earlier August of 2024. It took approximately 9 months for the CRC to approve me for my employee badge to enter the cultivation facility located in Franklin, New Jersey.</p> <p>I started working at the Franklin, New Jersey, Ascend Wellness Cultivation Center location around March of 2024.</p> <p>However the career path of learning how to cultivate cannabis was abruptly terminated when the Accend Wellness Human Resources Department received an email from the CRC stating to take my employee badge because Mr. Green has been terminated after two and half months of employment.</p> <p>The termination was due to prior (2) CDS possessing convictions in Jersey City, Hudson County, New Jersey one of the convictions was in 1990, 34 years ago and the second conviction was in 1994, 30 years ago when the sale or purchasing of Cannabis was Illegal.</p> <p>I also had an unfortunate experience was arrested and convicted of Conspiracy to commit Bank Fraud in the United States Western District Court of Kentucky in 2012. I served a 2 years sentence in Federal Prison, Brooklyn MDC as a Cadra Inmate I was classified as a camp status Inmate with 3 years of Federal supervised. I always thank God that I don't look like what I've been through.</p> <p>Since my untimely release from Accend Wellness Holdings, June of 2024, from the findings in my criminal background history by the Cannabis Regulatory Commission, I've attended many cannabis events, been a vocal advocate, speaking out, supporting many expungement events in the State of New Jersey and Pennsylvania as well networking with many brilliant minds in the New Jersey cannabis industry.</p> <p>In my closing, finishing up my 3 minutes of time, I'm hoping and praying that my all my concerns are resolved and Appropriately addressed in a timely manner.</p> <p>Im also respectfully requesting that the Cannabis Regulatory Commission allow me the opportunity to be a recipient of the "Promise" the promise of social equality and inclusion, the promise and opportunity to show that I am worthy and indeed my rehabilitation has been a remarkable milestone, an achievement, an absolutely genuine experience.</p> <p>I'm respectfully requesting, and sincerely need the time to provide the supporting documentations in order to showcase my rehabilitation status to the Cannabis Regulatory Commission.</p>
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