



MEMORANDUM

TO: BOARD OF COMMISSIONERS

FROM: CHRISTOPHER J. RIGGS, ACTING EXECUTIVE DIRECTOR

RE: BRUTE’S ROOTS, LLC SATELLITE DISPENSARY REQUEST – PAULSBORO

DATE: FEBRUARY 12, 2026

BACKGROUND: On July 28, 2025, Brute’s Roots, LLC (“Brute’s Roots”) filed a Regulatory Waiver Request for the approval of a satellite dispensing facility at 2001 S Delaware Street, Paulsboro, New Jersey 08066, in Gloucester (Gloucester being approved at the New Jersey Cannabis Regulatory Commission’s April 13, 2023, public meeting) through the Department of Health. Brute’s Roots received a letter of support in May 2025 from the Borough of Paulsboro.

The Paulsboro dispensary will be located at 2001 S. Delaware St, Unit B, Paulsboro, NJ 08066.

AUTHORITY: N.J.S.A. 24:6I-7a(2)(d)(i) authorizes an Alternative Treatment Center (“ATC”) to establish and maintain up to two satellite dispensaries, subject to NJ-CRC’s approval in accordance with N.J.S.A. 24:6I-1 *et seq.*

Brute’s Roots was awarded their permit following application through the 2019 Request for Applications and are therefore authorized to operate satellite dispensaries.

COMPLETENESS REVIEW: The Compliance Officer completed a memorandum addressing the steps taken to complete compliance review for the Brute’s Roots Paulsboro satellite dispensary request. An on-site inspection was conducted as well as review of the operator’s floor plans and Standard Operating Procedures to ensure compliance with the following expectations and standards of the New Jersey Cannabis Regulatory Commission (“NJ-CRC”):

- Adverse Event Reporting
- Quality Assurance/Control
- Recall of cannabis and Cannabis Products
- Inventory Control, Storage, and Diversion Prevention
- Recordkeeping
- Waste Disposal and Sanitation



- Dispensing
- Accounting and Tax Compliance
- Age Verification
- Consumer Education
- Receiving and Reporting of Test Results for Cannabis

The location meets patient needs due to its location in a densely populated area with a currently underserved patient population. The location is near multiple major transportation corridors, including Routes 38, 30, 70, and 130, as well as I-676 and I-76 across the Delaware River into Pennsylvania.

Brute's Roots will continue to utilize the "Dutchie" system for its point-of-sale transactions, as it does at its Egg Harbor Township location. Brute's Roots has provided access to the NJ-CRC for its "Dutchie" point of sale system.

A video surveillance system has been installed that provides unobstructed views of the inside and outside of the facility, including the DEA cage and cash safe. Access to the surveillance system has been provided to the NJ-CRC.

Brute's Roots received its final certificate of occupancy for the location from Paulsboro's Building Department on November 14, 2025.

A final inspection was completed for the Paulsboro location on November 6, 2025, by the assigned Compliance Officer.

In order to complete this memorandum, the following documents were reviewed:

- Amended and Restated Regulatory Waiver Request for Approval of an ATC Satellite Dispensing Facility
- Business Plan
- Construction Plan
- Inventory and Product Supply Plan
- Mobilization Plan
- Location/Floor Plans
- Municipal Approvals
- Demonstration of Patient Need
- Ownership structure
- Request for Consideration
- Certificate of Occupancy



RECOMMENDATION: It is the recommendation of NJ-CRC staff to approve Brute's Roots request to operate a satellite dispensary at the Paulsboro location. Brute's Roots has provided justification for the need to provide additional patient access and has satisfied the following: submitted a complete application, established site control and local approval at the Paulsboro location, and has satisfied the requests of the NJ-CRC Compliance Officer assigned to the ATC.

APPENDIX

N.J. Stat. Ann. § 24:6I-7 (West)

(d)(i) No entity may be issued or concurrently hold more than one medical cannabis cultivator permit, one medical cannabis manufacturer permit, or one medical cannabis dispensary permit at one time. An alternative treatment center which has been issued a permit to dispense medical cannabis from a medical cannabis dispensary shall be authorized to maintain up to two satellite dispensaries. A medical cannabis dispensary seeking to establish a satellite dispensary location shall obtain commission approval in accordance with P.L.2009, c.307 (C.24:6I-1 et al.) and P.L.2021, c.16 (C.24:6I-31 et al.) and, upon commission approval, shall be authorized to establish and maintain up to two satellite dispensary locations.

N.J. Admin. Code § 17:30A-7.8

(a) An ATC shall submit to the Commission an application for an amended permit, together with fees, if applicable, pursuant to N.J.A.C. 17:30A-7.10, prior to any:

1. Change of the alternative treatment center's location;
2. Change of the alternative treatment center's ownership;
3. Change of the alternative treatment center's name;
4. Change in the alternative treatment center's capacity; or
5. Modification of or addition to the alternative treatment center's physical plant.

(b) The alternative treatment center shall submit the application to the permitting authority no later than 30 business days prior to the change.

N.J. Admin. Code § 17:30A-7.10

(a) The following fees apply:

1. The annual fee for the review of a permit renewal application for an alternative treatment center is \$20,000;
2. The fee to apply for a change of location of the alternative treatment center is \$10,000;
3. The fee to apply for a change of capacity or any physical modification or addition to the facility is \$2,000; and
4. The fee to apply for the transfer of ownership of a permit is \$20,000.

(b) Fees shall be paid by certified check, money order, or any other form of payment approved by the Commission, and made payable to the “Treasurer, State of New Jersey.”