

New Jersey Cannabis Regulatory Commission
 Public In-Writing Comments
Public Meeting: June 30, 2022

Full Name	Meeting date	Comment
Staci Edmonds	6/30/2022	<p>I am seeking a conditional license in Voorhess, NJ; however, I am finding it extremely difficult to secure funding as a woman of color. The playing field is not equitable when you have corporations backing those who they want to see in this marketplace. Coming from Camden, NJ, I have seen my family and friends targeted, harassed, and beaten for possessing and selling marijuana and now that is legal, I am seeing that same treatment as I am trying to enter this market. Where is the help for minorities? Where is the inclusion? Where is the opportunity to develop wealth and better our communities? Why won't the SBA help minorities in the market? Why does the state of NJ not provide discretionary funds to support minorities enter this market?</p>
Gaetano Lardieri	6/30/2022	<p>Please see link below for supplemental article to the public comments I will be making this Thurs 30Jun2022.</p> <p>https://www.marijuanamoment.net/new-jersey-senate-president-files-psilocybin-legalization-bill-that-includes-home-grow-option-unlike-current-marijuana-law/</p>
barry doll	6/30/2022	<p>I oppose the applications from ELEVENELEVEN # 1102 and 1034--for a cultivation and manufacturing facility in Bergenfield NJ because of the danger it presents to our health and quality of life. Bergenfield is only 2.9 sq miles in area with 27,000 residents living within its border. The proposed marijuana facility threatens the air quality in this confined community and health of its residents. As an example Readington NJ which is 47 sq miles in area with a population of 16,000 residents had problems with the odor and fumes from a marijuana facility that opened in their town.</p> <p>Further, the proposed facility is close to 4 houses of worship , a music school next door O"Dibella , a public diner-the Brown Stone , next door , a government armory across the street which houses an indoor soccer field / school , across the street</p>

		<p>from a childrens' medical facility " Next Generation " , close to an elementary school " Hoover school " and across the street from a major shopping and apartment complex " Foster Village "</p> <p>Accordingly , for the reasons mentioned above , we oppose the development of the proposed facility in Bergenfield. Such a business belongs in the country , not in an urban town like Bergenfield</p> <p>Thank you for the opportunity to share this information with you</p> <p>Barry Doll Bergenfield</p>
Judith F. Despommier	6/30/2022	<p>Re: The ElevenElevenLLC application1102 and1034</p> <p>-I am again stressing the points that Bergenfield is an inappropriate site for the proposed factory, smack in between a diner (where customers stand in long lines to await seating on the weekend mornings with their children in tow.) and a music school. Nolt a farm area, It is also across the street from a government facility (an armory), a senior citizen complex, churches and houses of worship I had recently come to my attention that there was such a factory in an urban setting in Readington, NJ when after the complete factory was built, the residents complained about noxious fumes emanating from that facility. The facility in Readington had a 47 sq mile area with 16,000 residents. Bergenfield, NJ site is only 2.9 sq miles in an area with 27,000 Inhabitants. This proposed factory does not belong in an urban setting which Bergenfield is but in a farm stetting.</p> <p>There are also concerns relative to increased crime at the facility creating an unsafe situation in the homes located close to the proposed site. Bergenfield is an inappropriate the site for this pot factory.</p> <p>Respectfully submitted.</p>
Anthony White	6/30/2022	<p>Hello, we are sending this email to inform you want we are currently going through to attain our Mirco</p>

		<p>License in Plainfield. We need your help and guidance.</p> <p>We are Simple ReLeaf, LLC, a cannabis micro-dispensary company applicant seeking to locate in the Municipality of the City of Plainfield. However, to our chagrin, we have been informed the City no longer allows applicants to receive their acceptance or endorsement for those applicants to proceed to the state. At least, “not until the CRC makes a decision about the Plainfield applications that have already been submitted.” (see attached email response from the City’s Director of the Department of Economic Development, Ms. Valerie Jackson)</p> <p>We know the State has received an enormous number of applicants and is moving at a pace reasonable for the task and the quality of the agency it provides. We interpret the intent of the State CRC regulations to give good access to applications for diversity, social equity, etc., and other disadvantaged communities due to Cannabis Prohibition. We are such an applicant meeting some of these criteria. By the City halting their endorsement process, not for ordinance limitations or by a vote of the City council, but rather due to an Administrator’s view of the speed of CRC application processing, they are subverting the intent of the regulations and preventing our company from reaping the benefits said regulations are meant to afford us.</p> <p>This time is critical to our company’s objectives, as we are the only or among the very few applicants for the City of Plainfield that meet our unique particular criteria qualifications and would, according to the regulations, possibly be reviewed before some of the other applicants the City is waiting to hear the results concerning their dis/approval.</p> <p>This is counter-purpose to the intent of the CREAMM Act and the current CRC regulations. We are not sure of the City’s position in this matter, but we must and shall pass regardless. We believe we’d be remiss not to apply, especially considering our history and our right to apply.</p> <p>Additionally, we do not know what level of</p>
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Dalton Hirshorn	6/30/2022	<p>Do moves need to be A to B? If not, can cannabis be held in a warehouse and what are the requirements? How long can it be held before a delivery needs to occur? Can shipments be consolidated for optimal transport (line hauls to regions)? Can multiple products from multiple businesses be in the same vehicle? Do rules change with distance between drop locations?</p> <p>Is the Transportation license only available in a micro license? If not, what are the differences between a traditional and micro license? With a micro license can we contract work we control to other businesses?</p> <p>Can a micro license buy out other micro license businesses? To what effect would the bought business need to be dissolved to? Can the controlling licensing business keep the employee amount to 10 (not including principles) for each business?</p> <p>How is the storage of vehicles mandated? Particular to the necessary security off duty/empty vehicle, where can the vehicle be left? Does it need to be in a facility/warehouse?</p> <p>What security is needed of the vehicle and</p>

		<p>personnel during transporting cannabis and other products? There is an understanding that background checks need to be completed on each "driver" and after clearance will they need to be certified in any other aspect? Do they need to be armed? Secondly, what is the required GPS of vehicles, tracking of vehicles as well as inventory need to be captured or recorded? Will police assist with stolen products/vehicles? Will this change if cannabis is federally approved?</p> <p>Is a facility/warehouse necessary for the Transportation license? Whether yes/no is storage and warehousing of cannabis applicable to the license? Can multiple addresses be issued to the same license (hubs within the same business)?</p> <p>The Transportation license when introduced to the industry did not have a license issued cap amount for NJ, has that changed? What other licenses whether traditional or micro are able to transport cannabis? To what extent as far as distance or size of shipments?</p> <p>Can cash be transported under the license? If so, what is the cap amount that can be moved, held or dropped? Does cash need to go straight to a "bank" after pickup? Can cannabis and cash be in the same vehicle during transport? What is the max amount of cannabis (monetary or weight) that can be in the vehicle during transport?</p>
Kellie Ellison	6/30/2022	<p>I'm looking for clarification whether a mezzanine or second level is allowed for a Micro Class 1 Cultivation license: the square footage of the building would occupy an area of no more than 2,500 square ft measured horizontally and the grow canopy would not exceed more than 2,500 square feet measured on a horizontal plane and would not exceed the 24' vertical limitation. Instead of tiered racking, the grow canopy would be on the second level as a single tier. We cannot find anything in the regulations that would not permit this, but we would deeply appreciate a direct response before we commit to our building design. We have tried emails and phone calls but haven't been able to get a direct answer to this question. Thank you.</p>

Emmanuel Amaya	6/30/2022	With the magnitude of additional taxrs being collected from adult use can we now have home grow as an option for medical patients that cannot afford the \$400-500 per ounce?
Toral Patel	6/30/2022	<p>Hello CRC committee, My name is Toral Patel. I have applied for the class 5 retail application and also had South Bound Brook County Email the Preference. I am women minorities owner. I have attached all the required documents. Christina Fischer (South Bound Brook Admistrator) has emailed the preference letter 4/20/22. Please let us know what is missing so I can update. We do have location secure in south bound brook as well. thank You, Toral Patel Application number :1752</p> <p>Below is the CRC wordings from their application process:</p> <p>The municipalities can also let the CRC know their preference and they can submit a letter within 28 days of your application submission indicating their preference (no later than April 30th).</p> <p>17:30-6.3 Municipal preference (a) A municipality may submit its preference(s) for the issuance of licenses to cannabis businesses by writing to the Commission pursuant to the notice required at N.J.A.C. 17:30-6.1(c).</p> <p>1. Such notice shall be received by the Commission within 28 days of receipt of an application and shall not conflict with any letter of support issued to a license applicant pursuant to N.J.A.C. 17:30-7.10(b)9</p>
Toral Patel	6/30/2022	Please remove my earlier public comment. It suppose to be email. Toral Patel
Randall Query	6/30/2022	<p>Dear Chair Houenou, Commissioners, and Executive Director Brown,</p> <p>I am Randy Query, Director of Government Relations for the American Association for Laboratory Accreditation (A2LA). I have been</p>

		<p>involved with laboratory accreditation for well over two decades. On behalf of A2LA, I am commenting on the cannabis testing standards for laboratories, specific to testing and accreditation standards.</p> <p>By way of background, A2LA is a non-profit, accreditation body with over 4100 actively accredited certificates representing all 50 states including over 140 organizations accredited for cannabis testing. We have been granting accreditation to testing laboratories in various industries since 1979. The criteria forming the basis for our laboratory accreditation program is ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories. We ourselves, as an accreditation body, have been evaluated against rigorous standards in providing this accreditation service and are recognized globally as an International Laboratory Accreditation Cooperation (ILAC)- recognized accreditation body.</p> <p>It is our understanding that the New Jersey regulations require the testing laboratories to obtain ISO/IEC 17025 Accreditation by an ILAC recognized accreditation body. We also understand that New Jersey has adopted the State of Maryland's testing standards as the interim testing standards to be used in New Jersey.</p> <p>We respectfully request that the Cannabis Regulatory Commission provide clarity on the type and frequency of accreditation body laboratory assessments that are required of the accreditation bodies. Routinely, accreditation bodies will conduct announced assessments at a frequency such as one during the initial year, a surveillance assessment in the second year of accreditation, and then a full renewal assessment the third year and every other year thereafter – with no assessments during the off year – provided the laboratory is in good standing.</p> <p>Maryland requires the accreditation bodies to implement a tighter accreditation scheme whereby we conduct both announced and unannounced</p>
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Tiffany Irvin	6/30/2022	<p>Hello,</p> <p>Hope all is well. First, I would like to say thank you to the CRC and its staff for all of the hard work that you all are putting in on a daily basis. My application number is 1910. My business One Smoke LLC is woman and minority owned. My business partner and I submitted our application in April. We haven't heard anything back. We dont know if we are moving forward or if we have to cure our application. We are unable to secure our local municipality support, funding and location without proof of having a conditional license. We learned in todays meeting that we aren't the only ones going through this struggle and the majority of us that are still waiting are either minority/women or social equity owned businesses. The CRC needs to give a better explanation on how applications are actually being received and then reviewed. I hope the CRC looks into this and come up with a resolution to these issues.</p> <p>Best Regards Tiffany Irvin, LPN</p>
Mark	6/30/2022	<p>I am writing to share an experience that I had yesterday 6/30 with Curaleaf Bordentown. The short story is I was told by Curaleaf staff that a product that I had ordered and had been using was "Recalled by the State". The staff member couldn't provide any details when I asked several times. I asked if she could have a manager call me. and have not heard back.</p> <p>Should I stop using the recalled product? Is my health at risk from using the recalled product this past week? This is very stressful</p>

		<p>I tried to post my whole experience but was limited by your document form. I have submitted the full text to crc.info@crc.nj.gov Please take the time to read the full text Thank You Mark Dingelstedt</p>
<p>Scott Bent</p>	<p>6/30/2022</p>	<p>Social equity, inclusion, and diversity are buzz words we often hear when talking about New Jersey Adult Use Cannabis. The words we are not hearing are special interest, business as usual, and political favors. However, actions speak louder than words!</p> <p>The New Jersey CRC speaks of safety and equity, but they have bypassed their own process and opened an adult use market that is taking millions of dollars out of the hands of the people who they are supposed to be serving. Priority applications have not been given priority. Diversity and inclusion do not exist in NJ Cannabis. Not one annual application for adult use cultivation, manufacturing or retail have been approved.</p> <p>We are a long way off from seeing any of what the CRC has determined as priority applicants becoming fully operational. Simply put cultivation takes a certain amount of time to produce enough product for businesses to be able to serve NJ. With only conditional applications being approved so far there is no telling when actual annual licenses will be issued.</p> <p>On May 24th, the NJ CRC created a path exclusively made for multi-million-dollar MSO's to be able to open vertical cannabis businesses that can immediately enter the adult use market. It surprised me how contradicting this was, especially since the CRC said prior the MSO's will not be able to do exactly what they are being allowed to do in the New Jersey cannabis market.</p> <p>Why does allowing a new ATC immediate entry into</p>

		<p>Adult Use Retail Sales make a difference? Because in an effort for social equity, inclusion and diversity in NJ Cannabis, a system was set up so the new businesses must rely on each other. Cultivators need manufacturers and vice versa. Retail dispensaries need cultivators and manufacturers and vice versa. Part of the CREMMA ACT does not allow for immediate multiple license or vertical operations within adult use cannabis in New Jersey. But now if you are a multi-million-dollar operation that can afford the bill then you can instantly have manufacturing, cultivation, and retail in a self-contained money engine.</p> <p>On April 11, 2022, the NJ CRC made the controversial decision to allow the existing ATCs to open for adult use it was clear the decision came from political pressure. But why take the added step to remove the requirement that any new ATC must wait at least one year before entering the adult use market? There was no reason other than to allow a path for people who never paid the price to end the war on drugs to benefit. Why issue a second location allowance for Columbia Care? Why would they need even more advantage when the system was created to not allow them to takeover the NJ Cannabis market, as they have done in so many other markets.</p> <p>If these decisions were made because of political pressure, then shame on the New Jersey Legislature. More specifically, shame on Senator Nick Scutari for applying pressure and threatening the NJ CRC with investigation and removal of leadership if they didn't open the adult use market immediately. The decision was not in the best interest of the mission of the NJ CRC and those they are intended to serve.</p> <p>Jeff Brown, Wesley McWhite III, Dianna Houenou, Sam Delgado it's time you really understand the assignment and stand up for the people you serve. The NJ CRC staff of 50, what is their time being allocated to? Why did your office spend so much time working on approval of ATC expansion and</p>
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		<p>approving a path for vertical adult use?</p> <p>Acreage, Ascend, Cresco, Curaleaf, GTI, TerrAscend, and Verano are all accountable for pushing this through and taking opportunity and money out of the hands of those the New Jersey CRC was intended to serve.</p> <p>I challenge you all to stand up and do the right thing. Can we finally see a market benefiting the people it has brutalized? Can the communities that have been so negatively impacted, be the beneficiaries of this new cannabis culture and the business opportunities that are present? NJ CRC, you decide.</p>
<p>Navdeep Bhasin</p>	<p>6/30/2022</p>	<p>Hello CRC,</p> <p>Generally speaking, it would be helpful for unselected applicants in the queue to have some sort of automated status update as to what is happening with their application ("Not Yet Reviewed", "In Review", "Denied"). Besides the fact that it would do much to quell anxieties, it allows those applicants to manage expectations/ keep things warm with other stakeholders (municipalities, landlords, investors etc.). Without having any sense of your standing, it is difficult to keep these other parties engaged and receptive to the business you are trying very hard to build, and you risk losing them. This then delays the applicant's ability to get things back on track and quickly turnaround submission for the conversion application, which ultimately slows down expansion/ access in NJ.</p> <p>Secondly, approvals are only announced during these public meetings. When are applicants that have failed in their application notified?</p> <p>Thank you!</p>