

**New Jersey Cannabis Regulatory Commission**  
**Public In-Writing Comments**  
**Public Meeting: February 8<sup>th</sup>, 2023**

Full Name	Start time	Comment
Susana Sotillo	1/9/23	Tax revenue from the largest Bloomfield dispensary (Rise) and micro-dispensaries should go to fund and staff an addiction center in the center of town, where there are dozens of empty stores. It should be staffed by properly trained former marijuana-drug users who have gone through rehabilitation and are competent and knowledgeable about the dangers of high THC content. They can help other young marijuana and drug addicts. Opening more dispensaries is counterproductive as medical and addiction research has shown because it normalizes addiction to weed and other drugs with serious consequences to the developing brains of adolescents and young adults.
Dawn Kauffman	1/10/23	Marijuana revenue should be split 4 ways. * extra police * vocational training opportunities for the unemployed at no cost * hearing aid help for employed folks to assist them in keeping jobs * community revitalization.
Christopher Michaud	1/13/23	Please consider allowing Class 2 Manufacturers to be able to establish public cannabis consumption areas. This opportunity would increase the ability to provide safe spaces for consumption that would typically already be zoned away from heavy traffic areas.
James Burns	1/15/23	Use the cannabis money to restore cola for retirees
Raul Hernandez	1/16/23	You should use that money to reinstate COLA for the retired Police and Fire personal. We have not had COLA for over 19 years and with the rising costs of inflation and everything else, we desperately need it.
Frank Tomaszewski	1/17/23	Good afternoon, It's been nearly a year since marijuana was legalized recreationally. I seem to remember Gov. Murphy commenting on revisiting legalizing home cultivation of cannabis for medical patients once the recreational market was off the ground / up and running. The recreational market here in NJ seems to be booming, there's even a news article from December of last year touting that recreational sales surpassed \$100 million in the third quarter of 2022. I am failing to understand how it is in the patients' best interest to keep home cultivation illegal. Our medicine is extremely expensive and there is not much difference in price between medical and recreational purchases. I have several other problems with the products offered at dispensaries -- there is very little in the way of mixed ratio

		<p>medicine, meaning strains that contain about equal parts CBD and THC, which poses a real problem for those of us who only get relief from these types of medicine. Also, the medicine offered at the dispensaries local to me is often OLD (Curaleaf routinely sells medicine that was packaged close to a year ago) and lacking terpenes, which are essential. Since terpene content has been required to be on packaging I have an extremely hard time finding strains with &gt;1% terpenes. The strains that do are often either very far from home (making the medicine more expensive with gas, tolls, etc) OR more expensive because the dispensaries know they can charge more for strains with higher terpene contents. I'd like for the CRC to at least acknowledge that not legalizing home cultivation for medical patients is a real problem and is not in line with what other states, namely NY, have done with their medical programs. Legalizing home cultivation is in the patients' best interest.</p> <p>Thank you, Frank</p>
Leomal Hidalgo	1/19/23	<p>The revenues produced from the legal sales of marijuana should be used to help build back our broken communities in need of TLC and Redevelopment and into things that will benefit the well being of our citizens and our state. For example like; building housing for homeless and veterans, building low income housing , upgrading public education, upgrading our transportation system and infrastructure, upgrading public safety , help people start businesses and to help the people that were harmed by the war on drugs.</p>
Michael Grasso	1/23/23	<p>Please consider putting the revenue towards re-implementing the cola for the fire and police officers.</p>
Robert A Holland	1/25/23	<p>Cola Cola Cola these men and women have sacrificed so much to serve their communities.</p> <p>It's time the state stopped giving out freebies and start giving these people what they are owed and worked for their whole lives</p> <p>Stop the BS enough is enough</p>
Go █████ Yourselves	1/29/23	<p>Stop beating around the bush and deliver already. We're waiting. Impatiently, I might add. Your prices are exorbitant, the amount of time it takes us to drive to the nearest dispensary is insane— I shouldn't have to drive more than 10 minutes but my trip to buy weed takes me OVER AN HOUR AND I HATE IT. Are you going to do anything about it, or should I start a boycott of NJ's dispensaries?</p>
Y'all █████	1/29/23	<p>Hey. You should listen to the people even though I know it's your job to infantilize us and make us seem dumber than you. █████ you all I hate this stupid country. Run by an elite that gives no █████ about the citizens. Eat █████— all of you.</p>

Heather Kaiser	1/30/23	<p>I am the CEO and Founding Member of Couslings' Route 420 LLC, a certified WBE. We were awarded our Class 5 conditional license in October and since then, we have hit nothing but brick walls in terms of municipal approvals and leasing space. We had a space locked down, but the town would not approve us because they promised it to someone else. We wasted time trying to convince them to approve us with no luck. They are only allowing one retail location. That is ludicrous compared to the number of licenses the state has awarded.</p> <p>We have hired a zoning attorney, a political consultant, and multiple realtors to help us find a space and town approval just to convert to an annual license. We are using our own funds to get this business off the ground. Municipalities have made it almost impossible to even get on a council meeting calendar to discuss approvals, let alone provide a reasonable area in which to open. Most zones are so small that there is literally zero availability in terms of a storefront. Other zones have one or two huge stores available, but the owners will not subdivide or they're raising rents to impossible heights. While we realize the state can't tell towns or property owners how to run their businesses or laws, the "little guys" like us are suffering. We just want to have the same opportunities as the MSOs like Ascend, Rise, and the like. It's incredibly unfair to the mom-and-pops that were told we would be able to get a foothold in this new exciting industry. We have done everything right in terms of applying, following the state's laws, and trying to find space that has otherwise been taken by established multi-state conglomerates.</p> <p>We respectfully request the state work aggressively with mom-and-pop shops in convincing municipalities that cannabis is for everyone and if we can have a liquor store on every corner, we should be able to open up to cannabis as well. I am happy to speak with the CRC personally to go into further detail on the trouble we are having, as I am sure there are more out there just like me who are completely frustrated with this process.</p> <p>Thank you, Heather Kaiser, CEO and Founding Member of Couslings' Route 420 LLC</p>
Justin Piatt	2/4/23	<p>In light of it being brought to national attention that Curaleaf received funding from the Russian Oligarchy, I feel that you should approve all of today's Cannabis small businesses that are applying for licenses. It's really hard to ignore the people who went through the process of financial disclosure that was laid out while ignoring the large multi-state growers with licenses that have violated that same procedure.</p>

		<p>The NJ Cannabis Regulation cannot become the protector of Curaleaf and other large multi-state grow operations, to the detriment of New Jersey residents. Regardless of where they got their money, Curaleaf charges charges in NJ three or four times what they charge in other states for the same exact product. They can get away with it -- it's hard to get a small business license, and New Jersey is the only state with recreational Cannabis and no home cultivation, even for medical patients.</p> <p>You have tightened the legal NJ cannabis market so tight that we've got lines outside in the winter cold.</p> <p>Please loosen the noose before you cheer about equity and successes, and do not let Curaleaf slide for deceptively and potentially unlawfully avoiding the financial disclosure requirements set forth by this very NJ Cannabis Regulatory Commission.</p>
Wednesday Mayer	2/5/23	<p>Good afternoon and ty for taking the time to hear my thoughts. I was wondering if the CRC had plans or would consider a liaison or a small committee for the Legacy Market to go out meet with them speak with them and perhaps give them some materials to show them the pathway to legal may not be impossible? I would help to organize something like this as I have some experience. My information has been provided. Thank you for your time.</p>
Edwin Robles	2/6/23	<p>I would like to start by saying thank you for taking the time to read this and giving us your undivided attention during this application process. I am writing this in hopes of being able to gain a opportunity to be selected for a license approval. Empire is well and ready to begin with Cannabis sales if given a license. All though it has not been easy, we have met all of the states conditions and requirements for a annual license. We at Empire will make sure to uphold the highest standards in every way possible. We plan to be a positive example in our community, hoping to grow into outreach programs that will create a positive reflection that will contribute back to our town. My whole life I have dreamed of being a business owner and being able to grow a successful business. If given the chance I will work day and night to make Empire a thriving business for our state and community. I believe in my heart that If given this opportunity I will not fail, I will give you my all, in order to make Empire the golden standard on how a Cannabis business should operate. Please allow us to demonstrate this to the state, we will not let you down.</p> <p>Sincerely,  Empire Dispensary LLC  Edwin Robles (US Army Veteran)</p>

Robert Rashkes	2/6/23	<p>I am interested in whether the Commission meetings can be virtually livestreamed and recorded so that the public may view them at their convenience. It is difficult for the public to be able to travel to and attend meetings in Trenton during the day. Local elected officials could benefit if they could watch the meetings at their convenience. I would also like to know whether applications to open Cannabis businesses are made available for public review so that the public can comment on them before the NJ Cannabis Regulatory Commission renders a decision on them.</p> <p>I am also including a hyperlink below to a video of a West Orange Township Council special workshop session that took place on January 31st on updating the township's local cannabis ordinance which you may wish to view. There are multiple references to changing rules from the NJ Cannabis Regulatory Commission over the past year that have confused the Township Council that were noted during the special session. You may wish to be aware of them.</p> <p>Kindly send any replies to my email address as my phone number is a landline phone and cannot get text messages.</p> <p>Thank you.</p> <p>Robert Rashkes 35 Oak Crest Road West Orange, New Jersey 07052 <a href="https://www.youtube.com/watch?v=FoN4J1mse4Y">https://www.youtube.com/watch?v=FoN4J1mse4Y</a></p>
Whitney Brennan	2/7/23	<p>Recreational users can purchase up to one ounce per day. Medical patients only are allotted 3 Oz. Per 30 days. Will the allotment be able to be moved up to 6oz per month like most states for Medical patients?</p>
Joe Wisniewski	2/7/23	<p>There is a Big concern for public safety. Traffic and quality of life issues.</p> <p>These dispensaries should be in remote areas that it don't interfere with the neighbors schools and other businesses</p>
Roberto Verthelyi	2/7/23	<p>I don't think that Blue Violets should be approved since 1) there is currently litigation against them 2) the location is within 300 feet of two schools and in close proximity to Stevens Institute of Technology. 3) The location is in violation of current Hoboken ordinances. 4) the owners are not members of racial or ethnic groups that have suffered disproportionately from the war on drugs nor come from an economically disadvantaged area.</p>
Hal Farver	2/8/23	<p>Can dispensaries be given the full range of numbers to do an allotment, or the ability to type in the amount purchased? With the change to tracking in grams, buying 12 G takes 4 allotments to complete - 7G, 2G, another 2G and finally 1G. This makes the</p>

		<p>process take much longer at the dispensary. A budtender showed me how it has to be done now and it would be much faster if they could pick the correct amount the first time to allot it.</p>
Kevin Riley	2/8/23	<p>I registered to speak assuming there would be an online Zoom option. Many cannot drive or afford to drive to Trenton for you to hear the working peoples' voices. CRC needs to make these "public" meetings more accessible and not in the middle of workers shifts on a weekday. Now I am required to call out of work and use my PTO on Thursday, March 2nd, just to be heard?</p> <p>The comments I wished to say publicly regard The Botanist and their delays in negotiations with UFCW 152 &amp; 360. The law says they must negotiate a CBA within 200 days. It has been 309 days since April 5th, our union recognition date. No employee wants to see their workplace's license revoked because we would be out of a job. It is many workers opinion that more needs to be done to penalize businesses (especially MSOs) who drag on negotiations unnecessarily.</p> <p>Further, it is the opinion of myself and majority of coworkers that The Botanist allegedly engages in union busting behavior and regularly breaks their LPA with UFCW by breaking their neutrality when they directly and indirectly disparage the union. I signed an NDA so I am unsure how specific I am allowed to be. When we voice our concerns for safety we get retaliated against. We are regularly told we cannot get raises because the union says they can't while we are negotiating wage increases. We are regularly told our schedules cannot be changed or accommodated because the union prevents such things from happening. The union has no such authority to force a company to withhold wage increases or to tell management how they can schedule. The union does not hold this position either. I cannot talk about the safety concerns without breaking my NDA, but the main concern is the negotiation time and alleged union busting activity and retaliation coming from The Botanist. The CRC needs to be able AND willing to take more action and protect workers in this industry more.</p>
David Feder	2/8/23	<p>Conditional license applicants (not micros) should only be required to show two years of prior residency at any time prior to the date of the application, NOT the most recent two years.</p> <p>The CRC has mistakenly refused to allow conditional applicants to apply unless they have a "current NJ resident." This violates the dormant commerce clause and NJ law.</p> <p>New Jersey's residency requirements are set forth in the Personal Use Cannabis Rules - Special Adopted New Rules: N.J.A.C. 17:30 and establish residency requirements ranging in three levels:</p>

\_..... Level A - Current Residency with immediately preceding (“the past”) consecutive years of Residency,

- Level B - Previous Consecutive years of Residency (not necessarily immediately prior), or

- Level C - Previous two years of Residency (not necessarily immediately prior nor necessarily consecutive).

New Jersey’s Personal Use Cannabis Rules - Special Adopted New Rules: N.J.A.C. 17:30 also establish residency requirements for four different application types and one for Bonus Points: (1) Impact Zone Applicants, (2) Microbusiness Applicants, (3) Conditional Applicants, (4) Annual Applicants and (5) Bonus Residency Points

(1) Impact Zone Applicants – require either Level A or Level B ownership - currently residing for three consecutive years or previously resided for three consecutive years

(2) Microbusiness Applicants - require both Level A and Level B ownership - currently residing for the past two consecutive years

(3) Conditional Applicants – require Level C ownership - previously resided for at least two years (not Level A “the past two years” nor Level B “two consecutive years”)

(4) Annual Applicants – require Level C ownership - previously resided for at least two years (not Level A “the past two years” nor Level B “two consecutive years”)

(5) Bonus Residency Points – require Level C ownership – previously resided for at least five years (not Level A “the past five years” nor Level B “five consecutive years”)

The following are the regulations applicable to impact zone and microbusiness applicants:

7:30-6.5 Impact zone business... 2. Where more than 50 percent of the ownership interest is held by a current resident or residents of an impact zone who have resided there for three or more consecutive years at the time of application;

17:30-6.7 Microbusiness... (c) 3. Shall meet all the following requirements regarding owners, passive investors, principals, and employees: i. One hundred percent of the ownership interest in the microbusiness license applicant or license holder shall be held by current New Jersey resident(s) who have resided in the State for at least the past two consecutive years, at the time of application;

17:30-7.3 Conditional cannabis business license application... (c) 14. For a microbusiness license applicant, proof that at least 51 percent of the total number of persons included in the microbusiness license applicant or license holder, including all owners, principals, and employees, are residents of either of the municipality in which the microbusiness is or will be located, or of a municipality bordering such a municipality, at the time of the application.

		<p>Contrarily – regular conditional or annual non-microbusiness and non-impact zone applicants have the following residency requirements:</p> <p>17:30-7.3 Conditional cannabis business license application... (c) 2. A list of the owners of the license applicant who have resided in this State for at least two years as of the date of the application, and documentation of such residency;</p> <p>17:30-7.4 Conditional license holder qualification... (a) 4. At least one owner of the license applicant shall have resided in this State for at least two years as of the date of the application;</p> <p>17:30-7.11 Qualification for annual cannabis business license... (a) 4. At least one owner of the license applicant has resided in this State for at least two years as of the date of the application;</p>
Charles Latini Jr	2/8/23	I am trying to get an answer as to how as a State, we are allowing Interstate billboards to advertise illegal cannabis operations. In Ewing there are 2. A direct response would be appreciated as I am acting on behalf of my Mayor and Council
Charles Latini Jr	2/8/23	Cap of cultivators needs to be carefully monitored. Looking at others State is great, but the oversupply in many markets hurts profitability and specifically makes smaller operators more vulnerable.
Charles Latini Jr	2/8/23	SEEF report. Commissioner Barker's comments underscore the need for the State to pony up general fund dollars to augment the Excise Tax. Putting such an important initiative solely on the backs on what is effectively a tax penalty on cannabis user needs to be evaluated through this lens as well.
M Jackson	2/8/23	Thank you, Commissioner Barker, for looking at the data, calling it out and supporting the Black and Brown communities. Once again, we are blinded of the truth. Less than 10% of black and brown applicants and 5% of Latino/ Hispanic is in acceptable. We are watching and demand what was promised and what is fair.
David L. Knowlton	2/8/23	<p>Dear Commissioners,</p> <p>My name is David Knowlton, and I am the President and Chairman of the Cannabis Education and Research Institute (CERI), a New Jersey nonprofit dedicated to supporting medical cannabis patients by working to advance unbiased medical research and credible information. I submit this comment regarding the recently proposed Cannabis Consumption Area regulations found in 55 N.J.R. 100(a).</p> <p>Consumption Areas are necessary for many patients who lack a safe and legal place to take their medicine due to federal prohibition, such as those living in federally subsidized housing. The proposed regulations, unfortunately, do not adequately protect these</p>



		<p>patients’ access to medicinal marijuana. We believe the following issues need to be addressed:</p> <ul style="list-style-type: none"> <li>• All consumption areas should ensure sufficient, safe, and prioritized patient access. <ul style="list-style-type: none"> <li>o Under the proposed regulations, recreational retailers are required to permit patients to bring in medicinal cannabis but have no requirements to guarantee them space once inside.</li> <li>o There are no reserved or separate spaces for patients in any consumption areas at expanded ATCs or recreational retailers.</li> <li>o Where there will be spaces available to recreational and medicinal users, potentially vulnerable patients who need to ingest cannabis out of medical necessity must inhabit and jockey with potentially intoxicated recreational users – akin to forcing patients to use a crowded bar as a doctor’s office.</li> </ul> </li> <li>• Consumption areas are limited to patients over 21 years old, even for patients with caregivers. Patients younger than 21 years of age who are appropriately accompanied should have access to a legal place to consume their medicine.</li> <li>• The regulations should distinguish between recreational consumption areas and those of alternative treatment centers (ATCs). <ul style="list-style-type: none"> <li>o ATCs should be permitted to have consumption areas available at every dispensing site, including satellite locations – restricting locations only penalizes patients. This can be distinct from the requirement of only 1 consumption lounge for recreational use per license holder.</li> <li>o To increase patient access, ATCs should be incentivized to create these areas through lower consumption area license application fees than recreational retailers.</li> </ul> </li> <li>• We also have concerns regarding the regulation’s vague language regarding “visible signs of intoxication.” <ul style="list-style-type: none"> <li>o There needs to be training specified in ATCs to improve sensitivity to patients when differentiating “visible signs of intoxication” from understandable medical symptoms.</li> </ul> </li> </ul> <p>CERI strongly urges the CRC to incorporate these recommendations to improve these regulations and to protect New Jersey’s medical marijuana patients.</p> <p>Thank you,  David L. Knowlton  Chairman  Cannabis Education and Research Institute (CERI)</p>
Jason A. Bacon	2/8/23	Re: ALLEGATIONS OF DISCRIMINATION AND/OR FAVORITISM REGARDING THE COMMISSION’S APPLICATION PRIORITY REVIEW PROCESS

Dear Honorable Board Members:

I am a social equity applicant, and I believe that I have been discriminated against by the New Jersey Cannabis Regulatory Commission (CRC) by not having my application considered by the Board with the priority review status that I should be entitled to.

I have prepared a detailed letter documenting my allegations regarding my experience with the CRC over the last year that I wish to present to the Board; however, it is too lengthy to be inserted into the public comment section on the Commission's website, as it exceeds the maximum character length that is allowed.

Moreover, I have requested each of the Commissioner's Agency-associated email addresses so that I may properly direct my correspondence to the board; nevertheless, my request was denied by CRC staff, and I was directed to submit my letter to the licensing department; or the investigator assigned to my application. However, considering my allegations concern the CRC staff members whom have been processing my application, I do not believe it is appropriate to forward my letter to the Board to anyone but the Commissioners.

It should be noted that I have already contacted and apprised the State Senator for my legislative district of this matter, as I am seeking oversight of the Commission.

Moreover, I have requested a meeting with the Board via the Commission's website to discuss this matter further.

I hope to hear from the Board in a timely matter regarding my allegations, so that I may provide further information concerning this matter to the Commissioners, and have this issue investigated and resolved.

Thank you for your attention to this matter.

Sincerely,

Jason A. Bacon

Curchin Cannabis, LLC