

Director Tyler Klimas  
Executive Director  
Cannabis Compliance Board  
555 E. Washington Avenue, Suite 5100  
Las Vegas, NV 89101  
Submitted via email: CCBmeetings@ccb.nv.gov

October 19, 2020

**Subject:** Comments Regarding Requested Change to NCCR Section 7

Dear Director Klimas and Members of the Cannabis Compliance Board,

Thank you for your commitment to improving regulatory oversight of Nevada's cannabis industry. We applaud your efforts to become the gold standard and are pleased to participate in the collaborative approach that the CCB has undertaken.

As the Nevada Dispensary Association previously commented in its June 9<sup>th</sup>, 2020 letter regarding proposed NCCRs, we reiterate the request that the Board consider amending NCCR 7.050 to bring the adult use delivery limit in line with the medical delivery limit.

Given that safety and quality of medical deliveries have not been an issue, we hope you will agree with this commonsense update. The lower delivery trip limit for adult use deliveries exacerbates a competitive disadvantage facing smaller operators due to the need for unnecessarily frequent trips to restock delivery vehicles with product. Larger companies with multiple retail locations and larger delivery fleets disproportionately benefit from this limitation. Additionally, fixing this arbitrary discrepancy will help adult use patients by facilitating quicker delivery times without detriment to regulatory soundness or public safety. As you are aware, many customers relying on cannabis for medical purposes are not medical marijuana cardholders.

Please consider adopting the following revision:

NCCR 7.050

1. A cannabis sales facility shall not deliver more than *10 ounces (283.5 grams)* of cannabis or an equivalent amount of cannabis products to any combination of consumers within a single trip.

Sincerely,

Chris Anderson  
President  
Sala Consulting LTD  
Submitted on behalf of D.H. Flamingo, Inc. (dba The Apothecary Shoppe)

# Silver State Government Relations



## Principals

Will Adler – [will@ssgr.us](mailto:will@ssgr.us)

Sarah Adler – [sarah@ssgr.us](mailto:sarah@ssgr.us)

Ernie Adler – [eealaw@pyramid.net](mailto:eealaw@pyramid.net)

## Senior Associate

Alex Tanchek – [alex@ssgr.us](mailto:alex@ssgr.us)

October 19, 2020

Members of the Cannabis Compliance Board:

Please address the current confusion/inconsistency regarding the application of regulations for the transportation of and the vehicles allowed to transport cannabis for testing.

Specifically, NCCR 11.015 sub 2:

*A cannabis testing facility is not required to use a cannabis distributor to collect or move samples for testing*

Ratifying the independent transportation privileges of cannabis testing facilities and NCCR 13.040 sub 3:

*The requirements of NCCR 13.010 for a cannabis distributor apply to a cannabis establishment that transports cannabis or cannabis products pursuant to this section without using a cannabis distributor.*

The current view some CCB staff have shared is cannabis testing facilities have to comply with new safety requirements and vehicle inspections, to the same degree as a cannabis distributor licenses. It is the position of Scientists for Consumer Safety(SCS) that laboratory vehicles need no safety of other modifications, as nothing in the regulations has changed to require laboratories to do their transportation any differently.

Additionally, we would like to request further clarification on emails sent to cannabis laboratories regarding the testing of CBD products. As instructed in a September 29 CCB email, SCS has contacted the Nevada Department of Agriculture (NDA) and received instructions on how to proceed. It is our understanding from NDA that no communications regarding tests or test results performed on CBD or CBD products by cannabis testing laboratories are to be sent to the NDA; only tests performed for the hemp program should be shared with the NDA and only on a voluntary basis at the request of the hemp grower.

Thank you,

Will Adler

Executive Director

Scientists for Consumer Safety

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**From:** Dani Baranowski <danibaranowski@outlook.com>  
**Sent:** Monday, October 19, 2020 9:48 PM  
**To:** CCB Meetings  
**Cc:** Tina Ulman; Shelby Stanley; Ashley Ciliberti; Dani Baranowski;  
info@chamberofcannabis.org  
**Subject:** URGENT: Public Comment for CCB Meeting 10/20/2020  
**Attachments:** CCB Letter 10\_20 Chamber of Cannabis.pdf

Please note the attached PDF file as public comment to the Cannabis Compliance Board meeting 10/20/2020 on behalf of the Chamber of Cannabis.



October 19, 2020

To the members of the Cannabis Compliance Board,

On behalf of the Chamber of Cannabis, we appreciate the opportunity to speak to the Board as passionate industry leaders, with hopes to clarify and provide transparency of procedures and processes set forth by the CCB. The Chamber of Cannabis is a newly formed 501(c)(3) nonprofit; we are a unified people who believe in the power of cannabis. We advocate for inclusive business opportunities, foster resources and connections, and campaign for the advancement of our diverse cannabis community.

Firstly, we would like to thank the CCB for the recent clarification provided regarding private consumption events. Consumption regulations have been difficult to understand, as laws made previously in regard to consumption have severely limited consumers to where and when they can consume their (taxed) cannabis. The Chamber of Cannabis suggests the following changes: A recent CCB release states, "The request for approval must be submitted by any and all licensed establishment participating in or sponsoring the event, not the event coordinator." We foresee the CCB receiving templated responses from multiple sponsors for each event; the Chamber would instead suggest the event coordinator provide documentation that all parties contributing to the event will not violate any of the Nevada Cannabis Compliance Regulations or Statutes. This aggregated document will expedite this potentially redundant policy. We further ask if the Board could clarify the cannabis limit, wherein the Board's release states, "If more than one ounce of cannabis will be on site, explain how the establishment will not exceed possession limits when preparing products." Is this referring to the legal limit of one ounce per person, or is the Board suggesting that an event providing more than one ounce total for any number of attendees would require further subjugation? Furthermore, please elaborate which

zoning ordinances will apply for private consumption events? Also, will the Board please provide clarification on what constitutes and is defined as “private?” Furthermore, can tickets to these events be sold, and will the establishment be allowed to charge patrons for entry? In regard to the process of requesting approval from the CCB, will this be the same form used to receive clearance for marketing and advertising purposes, and could the Board provide information on the applicable form?

Secondly, we urge the Board to rectify the issues regarding agent cards via Accela. If this Board is to govern a successful industry that requires each of the players to have current agent cards, this lengthy process must be amended immediately. As members of the cannabis industry, we appreciate the classification by Governor Sisolak as an “essential business” during the pandemic we are facing. Many Nevadans have suffered due to the massive economic impact on our tourism-dependent industries and are looking to contribute to an industry that continues to provide tax revenue for the state, as well as wellness and holistic healing. Cannabis professionals and those looking to shape this emerging Nevadan industry’s future must acquire agent cards to attempt to receive any employment within this sphere. The process of receiving these agent cards is antiquated and not conducive toward job creation and growth of the industry. Potential candidates for employment and employees renewing their cards are facing processing times of over one month, which results in devastating delays of employment and hinders our industry’s potential for growth. We respectfully recommend standardized processes by the regulating body, the CCB, that includes processing time limits to accept or deny Accela submittals.

Thirdly, it has been referenced in several previous public comments that the lack of communication from the CCB is a deterrent to industry momentum and may halt potential growth to many facets of this industry. We propose renewed attention to the previous statement by the Board regarding creating an advisory board of industry experts and leaders to contribute, communicate, and advise the CCB for any reason. Access to these valuable persons could

expedite communication and questions asked of the CCB. Please provide an update on the appointment process of this board and whether you are accepting further applicants, as we would be happy to refer and elevate our industry leaders.

Next, we would like to perpetuate licensing transparency, especially considering several complaints being leveraged at license holders may be addressed at these public meetings. If the CCB is to revoke any of the licenses of the accused parties, what will be the next licensing recourse? Will it be fair and just? We urge the Board to provide clear and direct licensing procedures so that interested parties have the ability to prepare resources to participate in our industry.

We, the Chamber, would like to extend ourselves as resources for the Cannabis Compliance Board. We look forward to the CCB providing impartial regulation that protects and perpetuates the opportunities the cannabis industry affords this great state of Nevada, so we may continue as "The Gold Standard in Cannabis."

Respectfully,

The Chamber of Cannabis

[info@chamberofcannabis.org](mailto:info@chamberofcannabis.org)

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**From:** Dani Baranowski <danibaranowski@outlook.com>  
**Sent:** Tuesday, October 20, 2020 9:29 AM  
**To:** CCB Meetings  
**Cc:** Tina Ulman; Ashley Ciliberti; Shelby Stanley  
**Subject:** URGENT: 10/20 Please read second portion of comment during second public comment

To the Cannabis Compliance Board,

We appreciate you taking the time to read the beginning of our public comment to the board and would ask you to consider reading in the second public comment, as follows below with the last sentence repeated to provide context.

Thank you for your consideration,

Chamber of Cannabis, Board of Directors

As members of the cannabis industry, we appreciate the classification by Governor Sisolak as an “essential business” during the pandemic we are facing. Many Nevadans have suffered due to the massive economic impact on our tourism-dependent industries and are looking to contribute to an industry that continues to provide tax revenue for the state, as well as wellness and holistic healing. Cannabis professionals and those looking to shape this emerging Nevadan industry’s future must acquire agent cards to attempt to receive any employment within this sphere. The process of receiving these agent cards is antiquated and not conducive toward job creation and growth of the industry. Potential candidates for employment and employees renewing their cards are facing processing times of over one month, which results in devastating delays of employment and hinders our industry’s potential for growth. We respectfully recommend standardized processes by the regulating body, the CCB, that includes processing time limits to accept or deny Accela submittals.

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