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**From:** Jennifer Gallerani <Jennifer.G@myblackbird.com>  
**Sent:** Friday, June 18, 2021 3:49 PM  
**To:** CCB Meetings  
**Cc:** Tyler Klimas; Tim Conder; Michael Miles  
**Subject:** Public Comment: CCB Board Meeting June 22, 2021

Dear CCB Board Members,

Blackbird is pleased to see the CCB continue the discussion regarding Blackbird's petition to waive the two driver/agent requirement under NCCR 13.025(5) [CCB Board Meeting Agenda Item VIII]. As per the June 15th Public Workshop, we will continue to provide the CCB with substantiation as to why two distribution agents are not needed in higher value transports. Insurance and security providers are generating statements for us, confirming the perspective that two drivers do not provide significant benefit when considering transport safety and security. We will share those letters with CCB early next week.

While the CCB considers permanent amendments to NCCR 13.025(5), we kindly ask that the Board continue to extend the temporary waiver from requiring two drivers for cargo loads over \$25,000. We are near the finish line with full vaccinations of our staff, but not quite there. We have been operating with single-driver transports since CCB granted the initial waiver in December 2019, and have had zero instances of positive COVID cases. The single-driver transports continue to be extremely effective in protecting our unvaccinated workforce from COVID-19.

In addition, because of the extended period of time we have been operating with single-driver transports, the reinstitution of the two-driver requirement will trigger a doubling of our current workforce. If the Board decides to discontinue the temporary waiver today, we will need 2-3 weeks to staff up, since 80% of our transports would immediately require two drivers instead of one. Please also note that we are wary of doubling our workforce, and investing substantial onboarding resources and training, if the end result is a permanent amendment to the regulation that then requires us to lay-off said new workforce. We have had no issues related to safety and security while operating with single-driver transports since December 2019.

Please consider extending the temporary waiver until a final decision is reached on the permanent amendment to this regulation.

Thank you,  
Jennifer Gallerani



an HERBL company

VP of Logistics

*Keep it moving.*

650.515.1381

[www.myblackbird.com](http://www.myblackbird.com)

[www.blackbirdgo.com](http://www.blackbirdgo.com)



June 21, 2021

Cannabis Compliance Board  
555 E. Washington Avenue, Suite 4200  
Las Vegas, Nevada 89101

Re: *June 22, 2021 Agenda:*  
*Request for Transfer of Interest - CWNevada, LLC to Fortress Equities, LLC*

To Whom It May Concern:

Please be advised that on August 3, 2020, the Department of Taxation published the Findings of Fact and Conclusions of Law ("FFCL") of their in-house administrative judge who recommended that I be stripped of my majority ownership of CWNevada, LLC's licenses.

In response, I timely prepared and mailed a Notice of Appeal to the Nevada Tax Commission as directed.

Despite my Notice of Appeal, no information on the appeal was ever given to me and I was given no notice of the Cannabis Compliance Board hearing which approved these FFCL on October 20, 2020.

Please be advised that based on the loss of my appellate rights, among others, I contest my loss of ownership of my CWNevada, LLC licenses and reject any transfer of licenses to Fortress Equities, LLC.

I ask that the Cannabis Compliance Board stay any decision on the transfer of CWNevada, LLC licenses until such time as I have been heard on appeal.

Thank you for your attention to this letter.

Very truly yours,



Brian C. Padgett



May 24, 2021

Cannabis Compliance Board  
555 E. Washington Avenue, Suite 4200  
Las Vegas, Nevada 89101

Re: *May 2021 Agenda:*  
*Request for Transfer of Interest - CWNevada, LLC to Desert Evolution, LLC*

To Whom It May Concern:

Please be advised that on August 3, 2020, the Department of Taxation published the Findings of Fact and Conclusions of Law ("FFCL") of their in-house administrative judge who recommended that I be stripped of my majority ownership of CWNevada, LLC's licenses.

In response, I timely prepared and mailed a Notice of Appeal to the Nevada Tax Commission as directed.


Despite my Notice of Appeal, no information on the appeal was ever given to me and I was given no notice of the Cannabis Compliance Board hearing which approved these FFCL on October 20, 2020.

Please be advised that based on the loss of my appellate rights, among others, I contest my loss of ownership of my CWNevada, LLC licenses and reject any transfer of these licenses to Desert Evolution, LLC.

I ask that the Cannabis Compliance Board stay any decision on the transfer of CWNevada, LLC licenses until such time as I have been heard on appeal.

Thank you for your attention to this letter.

Very truly yours,



Brian C. Padgett

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**From:** Abad Piza <abad6000@gmail.com>  
**Sent:** Tuesday, June 22, 2021 4:58 AM  
**To:** CCB Meetings  
**Subject:** Licensing process

I'm writing to you about becoming a small business in the cannabis industry. The pricing that has been placed on licensing is fair. Although I don't qualify due to the liquid asset requirement nor do I currently own a business I would still like to participate within the market.

From what I've learned and have been able to gather is that the only way in at the moment is to buy a current license. The cost of that is out of range for me but since lounges are being talked about and since it was already proven by the lawsuit that took place the Cookies Vs. The State of Nevada that the process was not fair. I was wanting to ask if the liquid asset clause and the need for a board could be removed and to allow for a S-Corp or Sole Proprietor to meet the qualifications for licensure.

I would like to be awarded a medical cultivation license in a way that anyone can apply.

Abad A. Piza  
(702) 609-1657  
Abad6000@gmail.com