

NEVADA WELLNESS CENTER LLC

3200 S. Valley View Las Vegas Nevada 89102

January 25, 2022

RE: Cannabis Compliance Board Agenda items within X.

Nevada Wellness Center remains opposed to proposed regulations.

X. Consideration of Proposed Amendments and/or Additions to the Nevada Cannabis Compliance Regulations.

A. Regulation 1. Issuance of Regulations; Construction; Definitions

1. NCCR 1.082. "Diversity Applicant" defined. (for possible action)

2. NCCR 1.083. "Diversity Certifying Entity" defined. (for possible action)

C. Regulation 5. Licensing, Background Checks, and Registration Cards

1. NCCR 5.045. Certification required to qualify as a diversity applicant. (for possible action)

Nevada Wellness Center remains opposed to a outside third party determining if a black applicant, is a black applicant, and having to pay them to do so.

This is the responsible of the CCB to approve applicants. 3rd party will take time and money.

*** We recommend as a solution the CCB allow the first 15 to 20 days after applications have been submitted as a "Public Challenge Period" of Diverse Applicants, who are claiming to be Owners, Officers and or Board Members.** The CCB has all of the information and investigators to double check this information.

Is there going to be a pre-application hearing to address questions for applicants and or the public? How long is the application period going to be open? See attached documents.

Does this only apply to Consumption Lounges?

If the Board elects not to make any of our proposed changes, NWC a 7-year license in good standing is requesting a waiver to the "Diversity Applicant" requirement.

Thank you all for listening,



Frank Hawkins
Nevada Wellness Center
702-470-2077

FROM THE DESK OF FRANK HAWKINS JR.

2009 ALTA DRIVE LAS VEGAS NEVADA 89106

December 14, 2021

RE: Cannabis Compliance Board Agenda items within # VII.

Please read my written comments into the public record.

Thank you for accepting my written comments regarding agenda item VII. Consideration of proposed Amendments and/or Additions.

I am opposed to these proposed regulations.

VII. Consideration of Proposed Amendments and/or Additions to the Nevada Cannabis Compliance Regulations.

A. Regulation 1. Issuance of Regulations; Construction; Definitions

1. NCCR 1.082. "Diversity Applicant" defined. (for possible action)
2. NCCR 1.083. "Diversity Certifying Entity" defined. (for possible action)

B. Regulation 4. Disciplinary and Other Proceedings Before the Board

1. NCCR 4.035. Category I Violations. (for possible action)
2. NCCR 4.040. Category II Violations. (for possible action)

C. Regulation 5. Licensing, Background Checks, and Registration Cards

1. NCCR 5.045. Certification required to qualify as a diversity applicant. (for possible action)

I am opposed to the Proposed Changes for the following reasons:

- Nevada Wellness Center is owned 100% by three black African American males. The only 100% Black owned Marijuana dispensary in the State of Nevada.
- I am offended by the fact we will need to prove we are a black owned company in future applications and have to spend money and time doing it. It is a burden.
- The White company doesn't have to certify before he submits his application.
- You are creating additional barriers for black applicants.
- I Frank Hawkins Jr, Andre Rhodes, Luther Mack Jr. collectively Nevada Wellness Center are requesting a waiver/exemption from these Cannabis Compliance Board regulations, if approved.
- The CCB who has the responsibility per the State of Nevada legislature to figure this out; not abdicate these issues to third party agencies.
- CCB should not relinquish their responsibility to other people/agencies.
- Has the CCB STUDIED THE DIVERSITY ISSUES – WHICH HAS CREATED BARRIERS TO ENTRY?

If the CCB approves this proposed regulation you will be treating NWC and 3 black men differently than anyone else.

over →

- Did the CCB review any information from the prior Dispensary application rounds that has been shared with the public?
- Did the CCB review historical failures and successes the Department of Transportation, City of Las Vegas Minority Business Program, Clark County, Department of Aviation, Las Vegas Valley Water District, Minority Business studies, etc.... Don't decide before studying the issues and sharing them with the public?
- No one from the CCB has asked our opinion about anything? Not that you have too.
- By passing this regulation you support adding barriers that hinder black applicants and stop most of them before they start, while the white male has no issues.
- Has the CCB STAFF researched current barriers in the prior two applications i.e., education requirements, money requirements over \$250,000, marijuana experience, mandated pre-bid hearing to address questions publicly, releasing the scoring process to the public so everyone is on the same page, prior to any applications being released?

Your decision today will have negative intended consequences for many decades to come. Your decision could be more important than the consequences.

OUR QUESTION TO THE CANNBSIS COMPLIANCE BOARD:

Is it LAWFUL to make a decision without all of the information? Your positive Decision will give birth to negative consequences, we must all live with. Please don't be irresponsible. Get all of the information.

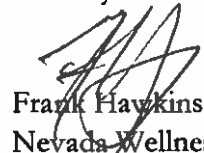
YOU SAY, "Diversity Applicant" means an applicant who wishes to have diversity considered as a criteria of merit in an application for a license for a cannabis establishment and who has been certified as a diversity applicant by a diversity certifying entity.

YOU SAY, "Diversity Certifying Entity" means an entity approved by the Board to certify an applicant as a diversity applicant.

I SAY, YOUR DEFINITION OF "DIVERSITY" MEANS DILUTE BLACK PEOPLE. WE SHALL SEE HOW MANY BLACK APPLICANTS THERE ARE AND HOW MANY RECEIVE DISPENSARY OR CONSUMPTION LOUNGE LICENSES IN THE FUTURE APPLICATION ROUNDS.

In closing, this Game of Chance we are all playing in Nevada, is a game of that benefits the Wealthy. This game of Chance should be an opportunity for all Nevada's too participate in this billion-dollar industry.

Thank you all for listening,



Frank Hawkins
Nevada Wellness Center
702-470-2077

Proposed Changes to NCCR Regulation 1

New

~~Deleted~~

1.051 "Address" defined.

1.069 "Board Member" defined.

1.132 "Officer" defined.

1.133 "Owner" defined.

1.051 "Address" defined. "Address" for purposes of NRS 678B.250(3)(a)(2)(II) means at least the specific local jurisdiction, either county or incorporated city, where the cannabis establishment will be located.

1.069 "Board Member" defined. "Board Member" for purposes of NRS 678B.250 & 678B.280 means a member who has unencumbered direct or indirect ownership of a company that holds or has applied to hold a license in a cannabis establishment. WHAT DOES THIS MEAN

1.132 "Officer" defined. "Officer" for purposes of NRS 678B.250 & 678B.280 means an officer of a publicly traded company who holds or has applied to hold a license for a cannabis establishment. WHAT IF THEY ARE NOT A PUBLICLY TRADED COMPANY?

1.133 "Owner" defined. "Owner" for purposes of NRS 678B.250 & 678B.280 means an owner who has unencumbered ownership of a company that holds or has applied to hold a license for a cannabis establishment. FOR THE RECORD WHAT IS THE DIFFERENCE BETWEEN DIRECT OR INDIRECT

Proposed Changes to NCCR Regulation 5

New

~~Deleted~~

~~5.040 Licensing of cannabis establishments: Criteria of merit; relative weight. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how the Board will determine the ranking of the applications made in response to a request by the Board pursuant to NCCR 5.020. Submission of application for a cannabis establishment license.~~

~~5.050 Request by applicant for ranked application score; request to review scoring information; designation of Board employee to respond to request; maintenance of information in application file. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how an applicant may review the scoring of an application made in response to a request by the Board pursuant to NCCR 5.020. Selection of diversity applicants.~~

~~5.055 Issuance of license if Board receives only one application in response to request for applications; notification to locality. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how the Board will handle only one application made in response to a request by the Board pursuant to NCCR 5.020. Selection of social equity applicants.~~

~~5.060 Issuance of license is conditional until certain requirements for approval to begin operations are satisfied. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on conditional licenses issued in response to a request by the Board pursuant to NCCR 5.020. Issuance of license if Board receives less applications than available cannabis establishment licenses for an open application period.~~

~~5.065 Written notice of denial of application.~~

~~5.040 Licensing of cannabis establishments: Criteria of merit; relative weight. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how the Board will determine the ranking of the applications made in response to a request by the Board pursuant to NCCR 5.020. Submission of application for a cannabis establishment license. During an open application period for a cannabis establishment license, a person may apply for one license of the type of cannabis establishment license that has an open application period. The applications must be submitted through the Board's designated licensing application system, Accela, during the time listed on the open application period. No applications will be accepted before or after the open application period. The deadline for application submission and compliance with the application instructions will be strictly enforced. The Board will grant no grace period for applications once the application period has concluded. The Board will not be held responsible for any~~

Proposed Changes to NCCRs 1, and 5 for Consideration

technical issues that may occur with the licensing application system during the application period. Failure to submit an application in a timely manner, for any reason including technical issues, will result in denial. Questions on the application and/or application submittal process shall only be submitted in writing to an email specifically designated for that purpose in the application instructions and the Board cannot guarantee a response within any particular time frame and/or prior to the application submittal deadline. No applicant is entitled to rely on any verbal information relayed to them regarding the application submittal process. All official application instructions will be posted on the Board's website at www.ccb.nv.gov. The applicant must also provide a point of contact, as required by NCCR 2.050, and update that information as necessary.

THERE SHOULD BE A PRE APPLICATION PERIOD TO ANSWER AND ADDRESS QUESTIONS REGARDING THE APPLICATION. HOW LONG WITH THE APPLICATIONS BE OPEN?

In the event the number of licenses for any establishment type are limited, and if the application meets the criteria to be included, the application will be entered into a random number generator to determine which applicants will be selected. If selected through the random number generator, the application will be eligible to receive a prospective cannabis establishment license. If there is no limit on the number of licenses to be awarded in any particular licensing period, a random number generator will not be used. However, the applicant must meet all the requirements in the application to receive the prospective license before they can be considered for suitability review by the Board to receive a conditional license.

There is no guarantee that even if the application is selected by the random number generator to receive a prospective license that the person will receive a conditional license. To receive a conditional license the applicant must be deemed suitable by the Board.

1. The initial application must include the following:

(a) A one-time, nonrefundable administrative processing fee in an amount designated in NRS 678B.390 for that particular cannabis establishment license type.

(b) An application on the Accela Portal as created by the Board. The application must include, without limitation:

(1) The type of cannabis establishment license the applicant is applying for;

(2) The legal name of the proposed cannabis establishment, as reflected in the articles of incorporation or other formation documents filed with the Nevada Secretary of State;

(3) Affirmation that the applicant controls liquid assets in an amount of at least \$200,000.00;

(I) Warning: if the applicant is successful in receiving a prospective license this affirmation will be verified and if untrue may be used to deny the applicant from receiving a conditional license.

(4) The address where the proposed cannabis establishment will be located and, if applicable, the physical address of any co-owned or otherwise affiliated cannabis establishments;

(I) An attestation wherein the applicant agrees and understands that the actual location of the cannabis establishment must be a location which may not be within 1,000 feet of a public or private school that provides formal education traditionally associated with preschool or kindergarten through grade 12 and that existed on the date on which the application for the proposed cannabis establishment was submitted to the Board, within 300 feet of a community facility that existed on the date on which the application for the proposed cannabis establishment was submitted to the Board or, if the proposed cannabis establishment will be located in a county whose population is 100,000 or more, within 1,500 feet of an establishment that holds a nonrestricted gaming license described in subsection 1 or 2 of NRS 463.0177 and that existed on the date on which the application for the proposed cannabis establishment was submitted to the Board,

(II) While the physical address may change prior to opening the cannabis establishment, this address will be used to identify the locality where the cannabis establishment must be located and remain pursuant to NRS 678B.500.

IS THE AWARD GOING TO BE BASED ON THE LOCATION AND PLANS? NO POINTS

(III) Warning: once a local jurisdiction is selected by the applicant the applicant is limited to locations within said local jurisdiction pursuant to NRS 678B.500.

(5) The mailing address, telephone number, and electronic mail address of the applicant;

(I) Warning: if contacted by the Board the applicant must respond immediately, but if that is impossible, no later than 24 hours after contact by the Board. If the applicant does not timely respond to any Board communication that fact may be used to deny the applicant from receiving a prospective, conditional or final license.

(6) The name, address, and date of birth of each person who is proposed to be an owner, officer or board member of the proposed cannabis establishment. If the applicant or an owner is any type of business entity and/or is not a natural person said entity must submit the aforementioned information for all owners who hold shares or any type of ownership interest directly or indirectly in any way that equate to 5% or greater in the company must be listed;

(I) All owners of any entity within the ownership structure of the person who may be the cannabis establishment license

holder must be listed if the person owns 5% or greater interest in any entity within the ownership structure.

(7) For cannabis consumption lounges only, an affirmation that no person who owns 5% or greater interest in any entity within the ownership structure of the person who may be the cannabis consumption lounge license holder has applied for another cannabis consumption lounge license.

SO A LOUNGE ONLY CAN HOLD UP TO 4.9% IN MULTIPLE LICENSES

(I) Warning: if any application has an owner who owns 5% or greater interest in any entity within the ownership organization chart of the person who may be the cannabis consumption lounge license holder and said owner is also on any other application wherein that person is also an owner who owns 5% or greater interest in any entity within the ownership structure of the person who may be the cannabis consumption lounge license holder all such applications will be removed from consideration. Any application removed for any reason will not have its administrative processing fee returned, it is a nonrefundable fee.

BUT 4.9% IS OK IN MORE THAN 2 LICENSES.

(8) For each owner, officer and board member listed in the application, please provide the Accela agent card portal record number showing proof the person has applied for an agent card as a prospective owner, officer, or board member;

(I) Please note, payment of the agent card fee will not be required until the applicant has successfully been awarded a prospective cannabis establishment license. All other sections of the application must be completed, including submission of the fingerprints of the person to the Central Repository for Nevada Records of Criminal History for submission to the Federal Bureau of Investigation to determine the criminal history of that person.

(II) Warning: if any applicant owner, officer, and board member listed in the application has been convicted of an excluded felony offense, per NRS 678B.050, the application will be removed from the process and thereby prevented from receiving a prospective, conditional or final license, depending on where it was in the process.

(9) If the applicant wishes to be considered a diversity applicant, the applicant must affirm that they have received a certification pursuant to NCCR 5.045; and

WE ARE OPPOSED TO ADDING BARRIERS TO ENTRY.

(I) Warning: if the applicant is successful in receiving a prospective license this affirmation will be verified and if untrue may be used to deny the applicant from receiving a conditional license.

NO MINORITY SHOULD HAVE TO PROVE THEY ARE BLACK. THERE SHOULD BE A CHALLENGE PERIOD, SAY 30 DAYS FOR THE PUBLIC TO CHALLENGE THOSE THEY SUSPECT OF CHEATING. THOSE APPLICANTS SHOULD HAVE TO PROVE THEIR RACE.

WE DON'T KNOW HOW LONG THE APPLICATION PERIOD WILL BE OPEN, WE DON'T KNOW IF THERE WILL BE A PRE-APPLICATION PERIOD TO ANSWER QUESTIONS OF THE APPLICANTS AND OR PUBLIC.

NWC HAS 3 BLACK/AFRICAN AMERICAN OWNERS, WE SHOULDN'T HAVE TO WASTE ANY TIME PAYING A THIRD PARTY ENTITY. HOWEVER WE SUPPORT A CHALLENGE

Proposed Changes to NCCRs 1, and 5 for Consideration

(10) An attestation that the information provided to the Board to apply for the license for a prospective cannabis establishment is true and correct according to the information known by the affiant at the time of the attestation.

2. If the applicant has obtained a prospective cannabis establishment license the applicant must fully cooperate with the Board in order for Board Agents to conduct a suitability check on the company and prospective owners of the prospective cannabis establishment license. HOW DO WE GET HERE? PLEASE EXPLAIN, AND I HAVE LICENSE AND HAVE APPLIED TWICE.

(a) The applicant must upload the following documents within 30 days after receiving a letter confirming that they have received a prospective cannabis establishment license:

(I) If the applicant is applying for a license for a cannabis sales facility, or cannabis consumption lounge, the proposed hours of operation during which either establishment plans to be available to sell cannabis to consumers;

(II) Evidence that the applicant controls at least \$200,000.00 in liquid assets; IS THIS NOT A PART OF THE APPLICATION?

(III) Operating procedures consistent with the NCCRs to ensure the use of adequate security measures;

(IV) Operating procedures consistent with the NCCRs for the use of an inventory control system;

(V) If the proposed adult-use cannabis establishment will sell or deliver adult-use cannabis products, proposed operating procedures consistent with the NCCRs for handling such products;

(VI) Whether the owners, officers or board members of the proposed adult-use cannabis establishment have direct experience with the operation of cannabis establishments in Nevada and whether they have demonstrated a record of operating such an establishment in compliance with the laws and regulations of Nevada;

(VII) Whether the owners, officers or board members of the proposed adult-use cannabis establishment have direct experience with the operation of a cannabis establishments in a state, jurisdiction or country other than Nevada and whether they have demonstrated a record of operating such an establishment in compliance with the laws and regulations of that a state, jurisdiction or country.

(VIII) The educational and life experience of the persons who are proposed to be owners, officers or board members of the proposed adult-use cannabis establishment;

(IX) The experience of key personnel that the applicant intends to employ in operating the type of adult-use cannabis establishment for which the applicant seeks a license and a short description of the role in which the person will serve for the organization and their responsibilities;

Proposed Changes to NCCRs 1, and 5 for Consideration

(X) The diversity on the basis of race, ethnicity or gender of the applicant or the persons who are proposed to be owners, officers or board members of the proposed adult-use cannabis establishment, including, without limitation, the inclusion of persons of backgrounds which are disproportionately underrepresented as owners, officers or board members of adult-use cannabis establishments.

(XI) If applying as a diversity applicant documents proving the applicant has been certified by a diversity certifying entity;

(XII) Last two fiscal year financial statements, including an income statement, balance sheet and EBITDA;

(XIII) Resumes for all owners, officers, and board members;

(IX) Two-year business plan and first year operating budget for the cannabis establishment; (XV) History of the company;

(XVI) If a publicly traded company the most recent Non-Objecting Beneficial Owner (NOBO) list; and

(XVII) Evidence that a social equity applicant's residence in an approved census tract by displaying an original or certified copy of any two of the following documents: GO BACK 10 YEARS TO MATCH ABILITY TO APPLY

(i) A receipt from the rent or lease of a residence located in an approved census tract;

(ii) A lease of a residence located in an approved census tract on which the applicant appears as the lessee during a lease term within the previous five years;

(iii) A record from a public utility for a service address located in an approved census tract which is dated within the previous five years;

(iv) A bank or credit card statement indicating a residential address located in an approved census tract which is dated within the previous five years

(v) A stub from an employment check indicating a residential address located in an approved census tract;

(vi) A document from a state or federal court indicating a residential address located in an approved census tract which is dated within the previous five years;

(vii) A document issued by an insurance company or its agent, including, without limitation, an insurance card, binder or bill, indicating a residential address located in an approved census tract;

(viii) A record, receipt or bill from a medical provider indicating a residential address located in an approved census tract;

(ix) Tax records for the most recent tax year, other than the records described in paragraph (k), indicating a residential address located in an approved census tract;

Proposed Changes to NCCRs 1, and 5 for Consideration

(x) A statement or bill requesting payment, other than a bill from a medical provider, indicating a residential address located in an approved census tract which is dated within the previous five years

(xi) A record of property taxes assessed or paid for the most recent tax year for a residence located in an approved census tract;

(xii) A deed of trust or other documentation of a current mortgage for a residence located in an approved census tract;

(xiii) A record from an educational institution in an approved census tract which establishes that the applicant is currently enrolled in the educational institution or an identification card issued by the educational institution which is dated within the previous five years;

(ixv) A receipt from a hotel, motel, recreational vehicle park or campground located in an approved census tract indicating not fewer than 30 days of consecutive residency in this State which is dated within the previous five years

(xv) A voter registration card issued to the applicant pursuant to NRS 293.517 within the previous five years;

(xvi) Documentation of receipt of benefits in an approved census tract under any state program of public assistance which is dated within the previous five years;

(xvii) A Leave and Earnings Statement, or an equivalent or successor form, indicating residency in an approved census tract, of an applicant who is a member of the military and who is deployed outside of this State while serving on active duty which is dated within the previous five years;

(xviii) A notarized statement from the owner of a residence located in an approved census tract indicating that the applicant physically resides at the residence which is dated within the previous five years;

(ixx) Documentation indicating that the applicant is a person for whom a fictitious address has been issued pursuant to NRS 217.462 to 217.471, inclusive; or

(xx) A form approved by the Department as proof of the applicant's residence in an approved census tract.

(xxi) As used in this section, "military" means the Armed Forces of the United States, a reserve component thereof or the National Guard.

(XVII) A social equity applicant must provide proof of conviction for a cannabis related offense for either the applicant or and applicant's parent, sibling, or child. Required documents are as follows:

(i) Certified copy of the Judgement of conviction; and

(ii) Proceedings sheet and/or court minutes.

(b) The documents listed under subsection (2)(a) are the minimum documents required to be uploaded to the Accela portal. The applicant must turn over any other documents requested by the Board. They must also facilitate in a timely matter any interview of an owner, officer, or board member requested by the Board or Board Agents. If the applicant is contacted by the Board or Board Agents for any reason the applicant must respond immediately, but if that is not possible, no later than 24 hours after contact by the Board. If the applicant fails to respond to any Board communication in a timely manner, that fact may be used to deny the applicant from receiving a prospective, conditional or final license.

(c) When a suitability investigation by Board Agents is complete a presentation shall be scheduled at a Board meeting. The applicant and any requested owner, officer, or board member must be in attendance and prepared to give an affirmative presentation to the Board regarding its application for a license and final suitability determination. The applicant must be prepared to answer any and all questions posed by the Board at a public meeting.

3. If the applicant has obtained a conditional cannabis establishment license the applicant must obtain the final license and the cannabis establishment must become operational within 12 months of receiving the conditional cannabis establishment license. The applicant must work closely with state and local officials to meet all necessary requirements to receive the final license as follows:

(a) The cannabis establishment is in compliance with the zoning and land use rules adopted by the local government in which the establishment will operate;

(b) The local government has issued a business license for the operation of the cannabis establishment, or otherwise approved the applicant, for the operation of the establishment;

(c) The Board completes an inspection of the cannabis establishment; and

(d) Completed any and other requirements as required by the specific regulations that governs the type of cannabis establishment a license was awarded for as well as any other requirement of the Board or local government.

4. If the applicant was denied a conditional license they may file an appeal to the Board if they wish to dispute said denial. The appeal must be filed with the Board within 30 days of the date on the written denial letter stating that the Board did not issue a license to the applicant. The appeal must include arguments as to why the Board's denial of the conditional license was improper. The Board shall set a hearing within 90 days of receiving the appeal.

THE INFORMATION MUST BE MADE AVAILABLE TO APPLICANT

5.050 Request by applicant for ranked application score; request to review scoring information; designation of Board employee to respond to request; maintenance of information in application file. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how an applicant may review the scoring of an application made in response to a request by the Board pursuant to NCCR 5.020. Selection

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of diversity applicants. Pursuant to the State of Nevada's policy on inclusion found in NRS 678B.280(1)(f), thirty percent of all cannabis establishment licenses shall be reserved for applicants that are certified as minority owned or female owned businesses, pursuant to NCCR 5.045. These applicants shall be selected through a separate random number generator process to take place first during open application periods. Any remaining certified applicants not selected through this inclusion process shall be entered into the selection process for the other seventy-percent of the available cannabis establishment conditional licenses. WHAT IS THE RANDOM NUMBER GENERATOR PROCESS? WHAT ARE OPEN APPLICATION PERIODS?

1. There is no guarantee that if an application is selected through the inclusion process by the random number generator to receive a prospective license that the applicant will receive a conditional license. To receive a conditional license the applicant must be deemed suitable by the Board.

5.055 Issuance of license if Board receives only one application in response to request for applications; notification to locality. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how the Board will handle only one application made in response to a request by the Board pursuant to NCCR 5.020.
Selection of social equity applicants. Whenever the State of Nevada mandates the selection of social equity applicants during an open application period for a cannabis establishment license, an applicant will qualify for potential selection as a social equity applicant if they meet the following criteria:

1. Social equity applicants are identified, and these criteria shall be added to the application process, as persons who have: ARE THE BELOW, AND, OR, EITHER OR ALL?

(a) At least 51% ownership in the business;

(b) Have resided in Nevada continuously for no less than the previous five years in a census tract, designated by the Board, defined as meeting the following three criteria; CENSUS TRACKS SHOULD GO BACK 10 YEAR, REQUIREMENT TO APPLY.

(I) A census tract where 75% of households are participating in a federal free lunch program; and

(II) A census tract that has an incarceration rate in the 90th percentile, or roughly 3.3% of everyone who grew up in the census tract was in jail or incarcerated at the time of the 2010 Decennial Census; and

(III) A census tract where at least 20% of the persons living within that code are receiving SNAP benefits.

(c) Are included in at least one of the following categories:

(I) Been convicted of a non-violent felony and/or misdemeanor cannabis related offense; or AT LEAST 10 YEARS AGO

(II) Their immediate family member (parent, sibling, or child) was convicted of a cannabis related felony offense and has lived in or currently lives in a census tract, designated by the Board, where:

(i) A census tract where 75% of the households are participating in a federal free lunch program;

(ii) A census tract that has an incarceration rate in the 90th percentile, or roughly 3.3% of everyone who grew up in the census tract was in jail or incarcerated at the time of the 2010 Decennial Census; and

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(iii) A census tract where at least 20% of the persons living within that code are receiving Supplemental Nutrition Assistance (SNAP) benefits.

2. Qualified social equity applicants shall have the administrative processing fee reduced as follows:

(a) If the social equity applicant who is the 51% owner of the company qualifies as an applicant designated in NCCR 5.055(1)(c)(I) the administrative processing fee pursuant to NRS 678B.390 shall be reduced by 75%.

(b) If the social equity applicant who is the 51% owner of the company qualifies as an applicant pursuant to NCCR 5.055(1)(c)(II) the administrative processing fee designated in NRS 678B.390 shall be reduced by 50%.

~~5.060 Issuance of license is conditional until certain requirements for approval to begin operations are satisfied. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on conditional licenses issued in response to a request by the Board pursuant to NCCR 5.020.~~ Issuance of license if Board receives less applications than available cannabis establishment licenses for an open application period. If during the open licensing period the Board receives less applications than there are available licenses, and if the applications are complete and in compliance with NCCR 5.040, the Board shall issue each applicant a prospective license.

~~5.065 Written notice of denial of application. Prior to requesting applications pursuant to NCCR 5.020, the Board will promulgate regulations on how written notice of a denial of application is given in response to a request by the Board pursuant to NCCR 5.020.~~

3. The employee training program shall include at a minimum eight hours of compensated instruction time for initial training and four hours of compensated supplemental instruction time each year thereafter.

15.050 Separate room for cannabis smoking, vaping, and inhalation. All indoor cannabis smoking or inhalation must be confined to a designated smoking room.

1. The room must be completely separated from the rest of the cannabis consumption lounge by solid partitions or glass without openings other than doors or pass-through service windows. PLEASE EXPLAIN? CANT SMOKE IN COMMON AREA OR OPEN AREA'S?

(a) All smoking-room doors and service windows must be self-closing and installed with a gasket to provide a seal where the door meets the stop.

2. The cannabis consumption lounge must create and mandate work protocols and indoor or outdoor air quality standards that minimize employees' secondhand smoke exposure.

(a) Minimize the need for employees to enter the smoke room, while still being able to monitor activities within the smoking room.

(b) Require employees to wear adequate PPE such as N95/KN95 masks or respirators to minimize secondhand smoke exposure while in the smoking room.

15.055 Ventilation of the cannabis consumption lounge. A ventilation plan must be submitted, approved, with changes as necessary, and fully implemented prior to issuance of a final license. At a minimum the ventilation plan must include:

1. A separate ventilation system capable of 30 complete air changes per hour at a minimum that must be directly exhausted to the outdoors within any designated smoking room;

2. A separate system capable of 20 complete air changes per hour at a minimum that must be directly exhausted to the outdoors within the rest of the cannabis consumption lounge;

3. The ventilation system within any smoking room must create a negative air pressure within the room;

4. A HEPA filtration system, or equivalent system, capable of handling the entire volume of air within any separate room of the lounge;

5. An odor mitigation plan that will eliminate odor as it leaves the building;

6. If the lounge has an outdoor smoking area, a filtration system sufficient to remove visible smoke from the smoking area and eliminate odor at the property line; and

7. Atmospheric monitoring of the non-smoking room of the lounge focusing, at a minimum on an 8-hr average and 15 min peak CO2 and PM 2.5 concentrations; and

8. Any local jurisdiction requirements.

15.060 Notices and additional disclosures.

1. The following are notices that must be posted within the cannabis consumption lounge in a conspicuous location.

(a) "HEALTH WARNING: Pregnant or breastfeeding people should not use cannabis or cannabis products. Using cannabis during pregnancy or while breastfeeding may be harmful to your baby's development."

(1) This health warning must be conspicuously posted in a minimum of 40-point font in every restroom of a cannabis consumption lounge.

Good Morning Cannabis Compliance Board, my name is Dani Baranowski, I am Vice President of the Chamber of Cannabis and Brand Manager for City Trees, a CLS Holdings USA brand. Board Member Jerrie Merrit: I heard your message during the Dr. King commemoration and was reminded of the opportunity and privilege that our market has to speak directly to our regulatory body. As we all anxiously await the official regulations of Social Consumption Venue licensing, I would like to thank the Cannabis Compliance Board for the extensive time and consideration that has gone into promulgating this new license type. I look forward to taking part in an evolving industry demographic of ownership shifting from one prominent and dominant archetype to a more diverse and balanced group, reflective of the Nevada cannabis community. The Chamber of Cannabis looks forward to furthering communication between industry leaders and incoming license holders to make Nevada's market, the "Gold Standard State."



Subject: Proposed Changes to NCCR regulation 1

Dear members of the Cannabis Compliance Board,

On behalf of CEIC (Cannabis Equity and Inclusion Community), thank you for considering our written support for the proposed changes to NCCRR regulation 1. We appreciate the board and sub committee's commitment to a diverse and inclusive Nevada cannabis marketplace.

CEIC is a C3 & C4 non-profit organization focused on the community disenfranchised by the failed war on drugs. We serve our community by advocating for equity, freedom, and opportunities in the Nevada cannabis marketplace.

By keeping diversity and social equity separated in the cannabis licensing process the CCB offers the community most harmed by the failed war on drugs the opportunity to compete in an equitable licensing round.

Thank you for your consideration,

A'Esha Goins
President, Black Joy Consulting
Founder, CEIC (Cannabis Equity and Inclusion)
702.350.2158

801 s. Las Vegas blvd
Las Vegas, Nv 89101
Blackjoyclub.com

Summary of proposal

The issue:

Non consumers are Complaining of cannabis smoke "Every place they go". Currently public use laws cannot be enforced because legally the only place to use is at home. Where does that leave the tourist? In A weird space. Either unsure and intimidated or you feel a sense of lawless- ness and smoke flangerenty amongst the other tourists. It's time to make it easier to enforce the law, It's time to make it easier to let visitors enjoy cannabis and time to make it easier for non users to avoid the smoke and the smell of cannabis.

Within the tourist/visitor corridors:

the strip

Fremont street

Fremont East

the art district

Bar & Taverns should be allowed a space for cannabis consumption if:

1. They were large enough in size to include a reasonably sized separate room for the use and storage of cannabis.
- 2.They partner with a consumption lounge licensee with the consumption lounge functioning us a sublet or a leased space with separate operations and management. While respecting Common or uncommon laws, regulations and codes
3. They'll train its employees to recognize and deal with over consumption of Cannabis.
- 4.they allow on site security as necessary for the proper and safe function of the Cannabis Consumption space
- 5.Commit to implementing any rules, codes or regulations Necessary for consumption space to operate.

Flash points needed for the strip corridor.

Smaller spaces for cannabis consumption.

Multiple locations along Las Vegas blvd.No long term seating simply a place to buy,consume then leave.

Any location to consider themselves a cannabis consumption business must:

follow all laws , codes and regulations; current and future.

Have modern filtration systems that eliminate smoke and odor.

Be properly staffed with security.

Not overtly advertise using images of cannabis use.

Respectfully to the NEVADA CANNABIS BOARD

For further details and or questions contact :

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