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STATE OF NEVADA CANNABIS COMPLIANCE BOARD

RE: (80th leg session) AB533 Sec 64 Subsection 4

The Board shall, by regulation, establish a pilot program for identifying opportunities for an emerging small cannabis business to participate in the cannabis industry. As used in this subsection, “emerging small cannabis business” means a cannabis-related business that:

- (a) Is in existence, operational and operated for a profit;
- (b) Maintains its principal place of business in this State; and
- (c) Satisfies requirements for the number of employees and annual gross revenue established by the Board by regulation.

Dear CCB Members, Thank you for the opportunity to provide comment on behalf of CEIC (Cannabis Equity and Inclusion Community)is focused on ensuring the cannabis industry in Nevada is inclusive of people who were disenfranchised by the war on drugs.

CEIC looks forward to assisting the board as it develops rules and regulations to address AB 533 Sec.64

Sincerely,

A'Esha Goins
President, Owner
Black Joy Consulting

April 25, 2022

My name is Kiera Sears, I am an owner of Helios NV, LLC., via Auragen, LLC. I operated Helios NV, LLC. for several years, and during the time that I did not operate it, Mallory French and Georgina Miller worked at Helios NV, LLC., operating it under various roles, to include Director of Compliance, Compliance Manager, Human Resources, Bookkeeper, Administrative Manager. During the dates of June/July 2019 – July 2020 (the dates when I was not operating the company), Mallory French and Georgina Miller, here Managing Members of The Lightwater Group, LLC., (which is currently in default with the State of Nevada Registrar), were both responsible agents for Helios NV, LLC., and during the time, certain actions took place under their purview, control, and direction, as acting compliance managers, accounting managers, human resource managers, and administrative managers, and currently Helios NV has been charged with numerous counts of non-compliance, as contained in the Complaint against it as filed by the CCB in September 2021.

Please find below my public comment, to be submitted and included as part of the public record, in my objection to all Management Service Agreements for Helios NV, LLC., and specifically, my objection to Grow Well Group, LLC., The Lightwater Group, LLC., and The Higher Source, LLC. I object to all three of the groups applying on April 26, 2022 for approval of management contracts for Helios NV, as they have all committed acts of noncompliance against the State of Nevada, have committed tortious and economic interference against Helios NV, have perjured themselves, and caused to both conspire together and frame Helios NV and its prior management, in an effort to manage the company themselves.

Specifically, during all times from July 2019 through July 2020, Mallory French and Georgina Miller both individually and at varied times held the positions of Director of Compliance,

Compliance Manager, Human Resources, Bookkeeper, and Administrative Manager. In fact, while holding such positions, Helios NV, LLC. was Summarily Suspended, received numerous Statements of Deficiencies, and caused actions to take place as alleged in the Complaint. Specifically, Mallory French was the agent responsible for ordering plant tags, when Helios was charged with not tagging all plants; Mallory French and Georgina Miller were responsible for filing and paying WMT returns when Helios was charged with not filing and paying returns; Mallory French and Georgina Miller were responsible for renewing agent cards of both employees and owners when agent cards were not timely renewed; Mallory French and Georgina Miller were responsible for conducting inventory reports and filing discrepancies with the State when Helios was charged with not keeping accurate inventory records and not maintaining accurate weights in METRC; as Point of Contact and Agent Designee, Mallory French held a duty to disclose the fire that occurred at the Facility, which again is charged as not being reported in the complaint; as Point of Contact and Agent Designee, Georgina Miller held a duty to disclose any noncompliance to the State, which is currently being alleged in the Complaint, and specifically, for destroying and/or non-delivery of video footage, conspiring with State Investigators to frame Helios NV, conspiring with Mallory French to hide packages and inventory, so as to frame Helios NV. I have detailed documentation, emails, and METRC screenshots to prove such action and conspiracy, and am happy to provide the CCB upon request.

Further, both Mallory French and Georgina Miller are interested parties in the arbitration that is currently ongoing between Helios NV and its investor group, Auragen, and indeed it was Mallory French and Georgina Miller who submitted perjured testimony to both Irene Howard and the Court, and thereafter the Arbitrator, in its efforts to remove West Plischke from his management role in Helios NV, so that it could take over operations. I have written documentation

by Mallory French and Georgina Miller to evidence their conspiracy with Irene Howard, Orlando Padilla, and Caleb Putnam to do so.

Further, both Mallory French and Georgina Miller are not only witnesses in the arbitration, but are the driving force behind Irene Howard filing the original lawsuit, as are Alyssa Gorham, Mary Anne Sawser, and Lisa Apodaca, all as Managers of The Higher Source, LLC., as are Caleb Putnam, Orlando Padilla, and Christian Klump, as owners of Auragen. Each of the three groups standing before you today committed tortious interference against Helios NV, LLC., conspired together to perjure themselves, to frame Helios NV and its prior management, and now stand as vested and interested parties in the ongoing arbitration between Helios NV and Auragen – each have a vested interest in the outcome of the arbitration, under which the receivership was granted.

It is a clear conflict of interest to appoint any company or approve any company to act as Manager of Helios NV where the Managers and Managing Members of such companies are interested parties in the active and ongoing arbitration between Helios NV and its investors, when during the arbitration, the arbitrator appointed a neutral receiver to take over the operations of Helios NV, and is now actively overseeing such receivership.

Further, I have documented evidence which I am happy to submit to the CCB upon request, which demonstrates that Orlando Padilla purposely evaded renewing his agent card with the State of Nevada, to cause Helios NV to be out of compliance with Nevada statutes and regulations. Further, I have documented evidence which I am happy to submit to the CCB upon request, which demonstrates that Orlando Padilla did not disclose his prior criminal history to the State of Nevada, and was not able to receive an agent card when he did.

Further, I have documented evidence which I am happy to submit to the CCB upon request, which demonstrates in direct conflict with statements in the complaint by the CCB against Helios NV, that in fact, CCB Investigators Mr. Justus and Ms. Leano did not weigh, or cause to weigh, Helios NV's inventory, and did not record, or cause to record, weights or accurate weights of Helios NV's inventory. In fact, that Mr. Justus and Ms. Leano used a formula developed by and with Mallory French, with which to frame Helios NV's prior management. I have emails between Ms. Miller and Mr. Justus discussing such conspiracy, in addition to emails between Irene Howard's son and Ms. Miller, discussing such conspiracy involving Inspector Justice.

Upon investigation of claims made against Helios NV in the CCB's complaint, I uncovered a formula that Mallory French started in July 2019, continued with Georgina Miller in October – February 2020, and provided to Investigators Justice and Leano in March 2020, when the alleged actions in the Complaint took place, under the direction of Ms. French and Ms. Miller. Specifically, Mallory French, Georgina Miller, Jeffrey Justus, and Ashley Leano used a formula for calculating actual and falsified variances of packages, for their various reports, and even now here in the Complaint. Mallory French and Meagan Geyer demonstrate using these variances as early as October 2019, and such variances are used throughout METRC and in their Quarterly Inventory Reports, Inventory Reports, emails, etc., to Jeffrey Justus, Ashley Leano, and Damon Hernandez, which are now used in the Complaint against Helios NV, citing false and fraudulent amounts that in fact were not the actual weights or variances as stated by Inspectors Justice and Leano during their March 4 and 5, 2020 inspections. The formula is as follows:

A pound of cannabis weighs 453.592g, which is right in the middle of 4.53 and 4.54, and to be specific, is 4.535 or 4.536, so one can divide any of the variances listed by 4.535 or 4.536 to get an even number, which is the percentage of a pound. For instance, 1% of a pound of cannabis would be either 4.53 or 4.54g, and alternating these numbers is how the formula works:

4.54
4.54 + 4.53 = 9.07
9.07 + 4.54 = 13.61
13.61 + 4.53 = 18.14
18.14 + 4.54 = 22.68
22.68 + 4.53 = 27.21
27.21 + 4.54 = 31.75
31.75 + 4.53 = 36.28
36.28 + 4.54 = 40.82
40.82 + 4.53 = 45.35
45.35 + 4.54 = 49.89
49.89 + 4.53 = 54.42
54.42 + 4.54 = 58.96
58.96 + 4.53 = 63.49
63.49 + 4.54 = 68.03
68.03 + 4.53 = 72.56
72.56 + 4.54 = 77.1
77.1 + 4.53 = 81.63
81.63 + 4.54 = 86.17
86.17 + 4.53 = 90.7
90.7 + 4.54 = 95.24
95.24 + 4.53 = 99.77
99.77 + 4.54 = 104.31
104.31 + 4.53 = 108.84
108.84 + 4.54 = 113.38
113.38 + 4.53 = 117.91
117.91 + 4.54 = 122.45
122.45 + 4.53 = 126.98
126.98 + 4.54 = 128.52

(mind you that these decimals can change up or down by a couple, if the formula being used is 4.535 or 4.54 being added each time, rather than alternating between 4.53 and 4.54.

The following packages stated in the Helios NV Complaint, use the formula for its stated variances:

4.54

Package 1823 – Justus and Leano reported variance as +4.54
Package 1838 – Justus and Leano reported variance as -4.58
Package 2477 – Justus and Leano reported variance as +4.54
Package 2479 – Justus and Leano reported variance as +4.54
Package 2480 – Justus and Leano reported variance as +4.69
Package 2487 – Justus and Leano reported variance as +4.54

Package 2503 – Justus and Leano reported variance as +4.52
Package 2536 – Justus and Leano reported variance as +4.53
Package 2546 – Justus and Leano reported variance as -4.54
Package 2554 – Justus and Leano reported variance as +4.54
Package 2556 – Justus and Leano reported variance of +4.54
Package 2559 – Justus and Leano reported variance as +4.54
Package 2560 – Justus and Leano reported variance as +4.53
Package 2563 – Justus and Leano reported variance as +4.54
Package 2565 – Justus and Leano reported variance as +4.53
Package 2566 – Justus and Leano reported variance as +4.53
Package 2567 – Justus and Leano reported variance as +4.52
Package 2653 – Justus and Leano reported variance of +4.53
Package 2838 – Justus and Leano reported variance as +4.54
Package 2840 – Justus and Leano reported variance as +4.54

4.54 + 4.53 = 9.07

Package 2189 – Justus and Leano reported variance as +9.07
Package 2190 – Justus and Leano reported variance as -9.07
Package 2322 – Justus and Leano reported variance as +9.07
Package 2456 – Justus and Leano reported variance as +9.07
Package 2530 – Justus and Leano reported variance as -9.07
Package 2777 – Justus and Leano reported variance as +9.07

9.07 + 4.54 = 13.61

Package 1807 – Justus and Leano reported variance as -13.61
Package 2500 – Justus and Leano reported variance as -13.61
Package 2531 – Justus and Leano reported variance of +13.57
Package 2534 – Justus and Leano reported variance as -13.61
Package 2535 – Justus and Leano reported variance as -13.61
Package 2541 – Justus and Leano reported variance as -13.61
Package 2542 – Justus and Leano reported variance as -13.61

13.61 + 4.53 = 18.14

Package 2486 – Justus and Leano reported variance as -18.14
Package 2488 – Justus and Leano reported variance as -18.14
Package 2537 – Justus and Leano reported variance as -18.14
Package 2538 – Justus and Leano reported variance as -18.15
Package 2539 – Justus and Leano reported variance as -18.15
Package 2547 – Justus and Leano reported variance as -18.15
Package 2568 – Justus and Leano reported variance as -18.14
Package 2781 – Justus and Leano reported variance as +18.15

$$\underline{18.14 + 4.54 = 22.68}$$

Package 2532 – Justus and Leano reported variance as -22.68

Package 2679 – weight reported by Justus as 22.70 (variance then = -.80)

$$\underline{22.68 + 4.53 = 27.21}$$

Package 1270 – Justus and Leano reported variance as -27.22

Package 2098 – Justus and Leano reported variance as +27.22

Package 2498 – Justus and Leano reported variance as -27.32

$$\underline{27.21 + 4.54 = 31.75}$$

Package 2300 – Justus and Leano reported variance as -31.75

Package 2507 – Justus and Leano reported weight as 31.75 (variance then = -263.09)

$$\underline{31.75 + 4.53 = 36.28}$$

Package 2219 – Justus and Leano reported variance as -36.29

$$\underline{36.28 + 4.54 = 40.82}$$

Package 2097 – Justus and Leano reported variance as +40.82

$$\underline{40.82 + 4.53 = 45.35}$$

Package 1808 – Justus and Leano reported variance as 45.36

$$\underline{45.35 + 4.54 = 49.89}$$

$$\underline{49.89 + 4.53 = 54.42}$$

$$\underline{54.42 + 4.54 = 58.96}$$

Package 2298 – Justus and Leano reported variance as -58.97

$$\underline{58.96 + 4.53 = 63.49}$$

$$\underline{63.49 + 4.54 = 68.03}$$

Package 2096 – Justus and Leano reported variance as +68.04

Package 2476 – Justus and Leano reported weight as 68.04 (variance then = -2.92)

$$\underline{68.03 + 4.53 = 72.56}$$

Package 2553 – Justus and Leano reported weight as 72.57

$$\underline{72.56 + 4.54 = 77.1}$$

Package 2505 – Justus and Leano reported weight as 77.11

$$\underline{77.1 + 4.53 = 81.63}$$

$$\underline{81.63 + 4.54 = 86.17}$$

Package 2554 – Justus and Leano reported weight as 86.18 (variance then = +4.54)

Package 2556 – Justus and Leano reported weight of 86.18 (variance of +4.54)

Package 2564 – Justus and Leano reported variance as +86.16

86.17 + 4.53 = 90.7

Package 2483 – Justus and Leano reported weight as 90.72 (variance then = - 7.40)

Package 2500 – Justus and Leano reported weight as 90.72 (variance then = - 13.61)

Package 2501 – Justus and Leano reported weight as 90.72 (variance then = - 7.49)

90.7 + 4.54 = 95.24

Package 2506 – Justus and Leano reported weight as 95.25 (variance then = - 2.95)

Package 2456 – Justus and Leano reported weight as 95.25

95.24 + 4.53 = 99.77

Package 2499 – Justus and Leano reported weight as 99.79 (variance then = - 7.43)

99.77 + 4.54 = 104.31

Package 2488 – Justus and Leano reported weight as 104.33 (variance then - 18.14)

104.31 + 4.53 = 108.84

108.84 + 4.54 = 113.38

113.38 + 4.53 = 117.91

117.91 + 4.54 = 122.45

Package 2492 – Justus and Leano reported weight as 122.47 (variance then = 7.42)

Other variants of the formula:

Beginning Packages

Package 935 – Justus and Leano reported weight of 703.07 (703.07/4.5359 = 155)

Package 1270 – Justus and Leano reported variance as -27.22

Package 1270 – Justus and Leano reported weight as 988.83 (988.83/4.53592 = 218) / variance - 27.22

Packages 1800's

Package 1807 – Justus and Leano reported variance as -13.61
Package 1807 – Justus and Leano reported weight as 1628.40 ($1628.40/4.5359 = 359$) / variance -13.61
Package 1808 – Justus and Leano reported variance as -45.36
Package 1808 – Justus and Leano reported weight as 1478.71 ($1478.71/4.5359 = 326$)
Package 1823 – Justus and Leano reported variance as +4.54
Package 1823 – Justus and Leano reported weight as 208.65 ($208.65/4.5359 = 46$) / variance +4.54
Package 1838 – Justus and Leano reported variance as -4.58
Package 1838 – Justus and Leano reported weight as 1778.08 ($1778.08/4.5359 = 392$) / variance -4.58

Packages 2000's

Package 2033 – Justus and Leano reported weight as 15476.57 ($15476.57/4.5359 = 3412$)
Package 2034 – Justus and Leano reported weight as 12537.29 ($12537.29/4.5359 = 2764$)
Package 2096 – Justus and Leano reported variance as +68.04
Package 2096 – Justus and Leano reported weight as 2313.32 ($2313.32/4.5359 = 510$)
Package 2097 – Justus and Leano reported variance as +40.82
Package 2097 – Justus and Leano reported weight as 2290.64 ($2290.64/4.5359 = 505$)
Package 2098 – Justus and Leano reported variance as +27.22
Package 2098 – Justus and Leano reported weight as 2113.74 ($2113.74/4.5359 = 466$)

Packages 2100's

Package 2189 – Justus and Leano reported variance as +9.07
Package 2189 – Justus and Leano reported weight as 644.10 ($644.10/4.5359 = 142$) / variance +9.07
Package 2190 – Justus and Leano reported variance as -9.07
Package 2190 – Justus and Leano reported weight as 1016.05 ($1016.05/4.5359 = 224$) / variance -9.07

Packages 2200's

Package 2219 – Justus and Leano reported weight as 771.11 ($771.11/4.5359 = 170$) / variance -36.29
Package 2219 – Justus and Leano reported variance as -36.29
Package 2223 – Justus and Leano reported weight as 2245.28 ($2245.28/4.5359 = 495$)
Package 2224 – Justus and Leano reported weight as 816.47 ($816.47/4.5359 = 180$) / variance -26.31
Package 2290 – Justus and Leano reported weight as 2844.02 ($2844.02/4.5359 = 627$)
Package 2298 – Justus and Leano reported variance as -58.97
Package 2298 – Justus and Leano reported weight as 1487.78 ($1487.78/4.5359 = 328$)

Packages 2300's

Package 2300 – Justus and Leano reported variance as - 31.75
Package 2300 – Justus and Leano reported weight as 2091.06 ($2091.06/4.5359 = 461$) / variance -31.75
Package 2318 – Justus and Leano reported weight as 802.86 ($802.86/4.5359 = 177$)
Package 2322 – Justus and Leano reported variance as +9.07
Package 2322 – Justus and Leano reported weight as 258.55 ($258.55/4.5359 = 57$)
Package 2344 – Justus and Leano reported weight as 326.59 ($326.59/4.5359 = 72$) / variance - 199.85
Package 2344 – Justus and Leano reported variance as 199.85 ($199.85/4.5359 = 44$) / weight 326.59

Packages 2400's

Package 2404 – Justus and Leano reported weight as 2286.11 ($2286.11/4.5359 = 504$)
Package 2419 – Justus and Leano reported weight as 480.81 ($480.81/4.5359 = 106$)
Package 2456 – Justus and Leano reported variance as +9.07
Package 2456 – Justus and Leano reported weight as 95.25
Package 2476 – Justus and Leano reported weight as 68.04 (variance then = -2.92)
Package 2477 – Justus and Leano reported variance as +4.54
Package 2477 – Justus and Leano reported weight as 312.98 ($312.98/4.5359 = 69$)
Package 2478 – Justus and Leano reported weight as 235.96 ($235.96/4.5359 = 52$)
Package 2479 – Justus and Leano reported variance as +4.54
Package 2479 – Justus and Leano reported weight as 312.98 ($312.98/4.5359 = 69$)
Package 2480 – Justus and Leano reported weight as 508.02 ($508.02/4.5359 = 112$)
Package 2481 – Justus and Leano reported weight as 879.97 ($879.97/4.5359 = 194$)
Package 2483 – Justus and Leano reported weight as 90.72 (variance then = -7.40)
Package 2486 – Justus and Leano reported variance as -18.14
Package 2486 – Justus and Leano reported weight as 136.08 ($136.08/4.5359 = 30$) / variance - 18.14
Package 2487 – Justus and Leano reported variance as +4.54
Package 2487 – Justus and Leano reported weight as 185.97 ($185.97/4.5359 = 41$)
Package 2488 – Justus and Leano reported variance as -18.14
Package 2488 – Justus and Leano reported weight as 104.33 (variance then -18.14)
Package 2492 – Justus and Leano reported weight as 122.47 (variance then = 7.42)
Package 2492 – Justus and Leano reported weight as 122.47 (variance then = 7.42)
Package 2495 – Justus and Leano reported weight as 217.72 ($217.72/4.5359 = 48$)
Package 2496 – Justus and Leano reported weight as 281.23 ($281.23/4.5359 = 62$)
Package 2497 – Justus and Leano reported weight as 589.67 ($589.67/4.5359 = 130$)
Package 2498 – Justus and Leano reported variance as -27.32
Package 2498 – Justus and Leano reported weight as 149.68 ($149.68/4.5359 = 33$)
Package 2499 – Justus and Leano reported weight as 99.79 (variance then = -7.43)

Package 2500's

Package 2500 – Justus and Leano reported variance as -13.61
Package 2500 – Justus and Leano reported weight as 90.72 (variance then = -13.61)
Package 2501 – Justus and Leano reported weight as 90.72 (variance then = -7.49)
Package 2503 – Justus and Leano reported variance as +4.52
Package 2505 – Justus and Leano reported weight as 77.11
Package 2506 – Justus and Leano reported weight as 95.25 (variance then = -2.95)
Package 2507 – Justus and Leano reported weight as 31.75 (variance then = -263.09)
Package 2507 – Justus and Leano reported variance as 263.09 ($263.09/4.5359 = 58$) / weight 31.75
Package 2508 – Justus and Leano reported weight as 1179.34 ($1179.34/4.5359 = 260$)
Package 2530 – Justus and Leano reported variance as -9.07
Package 2530 – Justus and Leano reported weight as 934.40 ($934.40/4.5359 = 206$) / variance - 9.07
Package 2531 – Justus and Leano reported variance of +13.57
Package 2531 – Justus and Leano reported weight of 1206.52 ($1206.52/4.5359 = 266$) / variance +13.57
Package 2532 – Justus and Leano reported variance as -22.68
Package 2532 – Justus and Leano reported variance as 893.58 ($893.58/4.5359 = 197$) / variance - 22.68
Package 2533 – Justus and Leano reported weight as 430.91 ($430.91/4.5359 = 95$)
Package 2534 – Justus and Leano reported variance as -13.61
Package 2534 – Justus and Leano reported weight as 748.43 ($748.43/4.5359 = 165$) / variance - 13.61
Package 2535 – Justus and Leano reported variance as -13.61
Package 2535 – Justus and Leano reported weight as 875.43 ($875.43/4.5359 = 193$) / variance - 13.61
Package 2536 – Justus and Leano reported variance as +4.53
Package 2536 – Justus and Leano reported weight as 571.53 ($571.53/4.5359 = 126$)
Package 2537 – Justus and Leano reported variance of -18.14
Package 2537 – Justus and Leano reported weight as 104.33 ($104.33/4.5359 = 23$) / variance - 18.14
Package 2538 – Justus and Leano reported variance as -18.15
Package 2538 – Justus and Leano reported weight as 848.22 ($848.22/4.5359 = 187$) / variance - 18.15
Package 2539 – Justus and Leano reported variance as -18.15
Package 2539 – Justus and Leano reported weight as 1070.48 ($1070.48/4.5359 = 236$) / variance -18.15
Package 2540 – Justus and Leano reported weight as 104.32 ($104.32/4.5359 = 23$)
Package 2541 – Justus and Leano reported variance as -13.61
Package 2542 – Justus and Leano reported variance as -13.61
Package 2546 – Justus and Leano reported variance as -4.54

Package 2547 – Justus and Leano reported variance as -18.15
Package 2547 – Justus and Leano reported weight as 349.27 ($349.27/4.5359 = 77$) / variance - 18.15
Package 2541 – Justus and Leano reported weight as 548.85 ($548.85/4.5359 = 121$) / variance - 13.61
Package 2542 – Justus and Leano reported weight as 394.63 ($394.63/4.5359 = 87$) / variance - 13.61
Package 2553 – Justus and Leano reported weight as 72.57
Package 2554 – Justus and Leano reported variance as +4.54
Package 2554 – Justus and Leano reported weight as 86.18 (variance then = +4.54)
Package 2556 – Justus and Leano reported variance of +4.54
Package 2556 – Justus and Leano reported weight of 86.18 (variance of +4.54)
Package 2559 – Justus and Leano reported variance as +4.54
Package 2559 – Justus and Leano reported weight as 213.19 ($213.19/4.5359 = 47$)
Package 2560 – Justus and Leano reported variance as +4.53
Package 2560 – Justus and Leano reported weight as 480.81 ($480.81/4.5359 = 106$) / variance +4.53
Package 2562 – Justus and Leano reported variance as 458.11 ($458.11/4.5359 = 101$)
Package 2562 – Justus and Leano reported weight as 784.71 ($784.71/4.5359 = 173$)
Package 2563 – Justus and Leano reported variance as +4.54
Package 2563 – Justus and Leano reported weight as 322.05 ($322.05/4.5359 = 71$)
Package 2564 – Justus and Leano reported variance as +86.16
Package 2564 – Justus and Leano reported weight 648.64 ($648.64/4.5359 = 143$)
Package 2565 – Justus and Leano reported variance as +4.53
Package 2565 – Justus and Leano reported weight as 376.48 ($376.48/4.5359 = 83$) / variance +4.53
Package 2566 – Justus and Leano reported variance as +4.53
Package 2566 – Justus and Leano reported weight as 222.26 ($222.26/4.5359 = 49$)
Package 2567 – Justus and Leano reported variance as +4.52
Package 2567 – Justus and Leano reported weight as 494.42 ($494.42/4.5359 = 109$) / variance +4.52
Package 2568 – Justus and Leano reported variance as -18.14
Package 2568 – Justus and Leano reported weight as 825.54 ($825.54/4.5359 = 182$) / variance - 18.14

Packages 2600's

Package 2623 – Justus and Leano reported weight as 8359.71 ($8359.71/4.5359 = 1843$)
Package 2624 – Justus and Leano reported weight as 11566.61 ($11566.61/4.5359 = 2550$)
Package 2653 – Justus and Leano reported variance of +4.53
Package 2653 – Justus and Leano reported weight as 1387.99 ($1387.99/4.5359 = 306$)
Package 2654 – Justus and Leano reported variance as 458.12 ($458.12/4.5359 = 101$)
Package 2654 – Justus and Leano reported weight as 648.64 ($648.64/4.5359 = 143$)
Package 2679 – Justus and Leano reported weight as 22.70

Packages 2700's

Package 2738 – Justus and Leano reported weight as 281.23 ($281.23/4.5359 = 62$)
Package 2739 – Justus and Leano reported weight as 240.40 ($240.40/4.5359 = 53$)
Package 2740 – Justus and Leano reported weight as 267.62 ($267.62/4.5359 = 59$)
Package 2741 – Justus and Leano reported weight as 5130.13 ($5130.13/4.5354 = 1131$)
Package 2744 – Justus and Leano reported weight as 843.68 ($843.68/4.5359 = 186$)
Package 2745 – Justus and Leano reported weight as 576.06 ($576.06/4.5359 = 127$)
Package 2746 – Justus and Leano reported weight as 766.57 ($766.57/4.5359 = 169$)
Package 2747 – Justus and Leano reported weight as 5506.61 ($5506.61/4.5359 = 1214$)
Package 2777 – Justus and Leano reported variance as +9.07
Package 2777 – Justus and Leano reported weight as 3397.41 ($3397.41/4.5359 = 749$)
Package 2778 – Justus and Leano reported weight as 508.02 ($508.02/4.5359 = 112$)
Package 2781 – Justus and Leano reported variance as +18.15
Package 2781 – Justus and Leano reported weight as 4055.12 ($4055.12/4.5359 = 894$)

Packages 2800's

Package 2838 – Justus and Leano reported variance as +4.54
Package 2838 – Justus and Leano reported weight as 1025.12 ($1025.82/4.5359 = 226$) / variance +4.54
Package 2840 – Justus and Leano reported variance as +4.54
Package 2840 – Justus and Leano reported weight as 1333.56 ($1333.56/4.5358 = 294$)
Package 2842 – Justus and Leano reported weight as 734.82 ($734.82/4.5359 = 162$)
Package 2843 – Justus and Leano reported weight as 1310.88 ($1310.88/4.5359 = 289$)
Package 2844 – Justus and Leano reported weight as 1188.41 ($1188.41/4.5359 = 262$)
Package 2846 – Justus and Leano reported weight as 2150.03 ($2150.03/4.5359 = 474$)
Package 2845 – Justus and Leano reported weight as 911.72 ($911.72/4.5359 = 201$)
Package 2847 – Justus and Leano reported weight as 3646.88 ($3546.88/4.5359 = 804$)
Package 2848 – Justus and Leano reported weight as 2277.03 ($2277.03/4.5359 = 502$)
Package 2849 – Justus and Leano reported weight as 1251.91 ($1251.91/4.5359 = 276$)
Package 2850 – Justus and Leano reported weight as 3760.28 ($3760.28/4.5359 = 829$)
Package 2851 – Justus and Leano reported weight as 2277.03 ($2277.03/4.5359 = 502$)
Package 2852 – Justus and Leano reported weight as 399.16 ($399.16/4.5359 = 88$)
Package 2853 – Justus and Leano reported weight as 1741.79 ($1741.79/4.5359 = 384$)
Package 2854 – Justus and Leano reported weight as 1247.38 ($1247.38/4.5359 = 275$)
Package 2858 – Justus and Leano reported weight as 961.62 ($961.62/4.5359 = 212$)

These formula amounts were first used by Mallory French in her inventory reports to the State, and are recorded by Mallory French and Georgina Miller in their METRC entries from July 2019 – July 2020, and these are also the formulaic entries reported by Investigators Justice and Leano in the Complaint against Helios NV.

I am happy to provide any documentation as requested by the CCB so as to support my objection.

Sincerely,

Kiera Sears

Kiera Sears, JD