



Sala Consulting

11700 W. Charleston Blvd  
Ste. 170-700  
Las Vegas, NV 89135

Cannabis Compliance Board  
Tyler Klimas, Executive Director  
555 E. Washington Avenue, Suite 5100  
Las Vegas, NV 89101  
Submitted via email: [regulations@ccb.nv.gov](mailto:regulations@ccb.nv.gov)

August 22, 2022

Dear Director Klimas and Cannabis Compliance Board Members,

On behalf of Planet 13 Holdings, thank you for this opportunity to provide input on proposed changes to NCCR 5.040. We hope the following will assist the Board in drafting and applying the provisions contained therein.

The inclusion of cannabis establishment location restrictions relative to gaming in Assembly Bill 533, codified in NRS 678B.250 3.(a)(II) and effective November 23, 2019, instituted an application requirement to designate a physical location for a proposed cannabis establishment that is greater than 1,500 feet from a nonrestricted gaming license.

Retail license applications from the Nevada Department of Taxation's (DoT) September 2018 application period did not require a physical location, pursuant to DoT guidance provided to the industry during the application period. Instead, DoT required the license awardees to obtain local jurisdiction approval and final state approval to operate. Initial license awards were made on a conditional license basis until facilities became operational.

Therefore, conditional retail licenses issued in 2018 do not qualify for grandfathering from the 1,500 foot gaming setback, unless the conditional license awardee become operational and received final state approval to open prior to the November 23, 2019 effective date of AB533. A licensee who had not provided a physical location to the CCB for their conditional license (not yet opened) on or prior to November 23, 2019, cannot apply for a retail cannabis consumption lounge at that location.

Statutes enacted by the Assembly Bill 341 consumption lounge legislation further clarify the distinction regarding license status referenced above. NRS 678B.322 1.(b) states that the Board shall not issue a retail consumption lounge license unless "The adult-use cannabis retail store for which the applicant holds an adult-use cannabis establishment license is operational", referring back to the standard for location restrictions in AB533 and NRS 678B.250 3.(a)(II).

In conclusion, only retail licensees who were in operation on or prior to November 23, 2019 are qualified as being in compliance with the gaming distance setbacks enacted under AB533 and therefore eligible for a retail cannabis consumption lounge license.

For convenience, I am attaching the relevant passages of NRS 678B.250 3.(a)(II) and NRS 678B.322 1.(b) below.

Sincerely,

Chris Anderson  
President  
Sala Consulting  
11700 W Charleston Blvd  
Las Vegas, NV 89135

### **NRS 678B.250(3)(a)(2)(II)**

The physical address where the proposed adult-use cannabis establishment will be located and the physical address of any co-owned additional or otherwise associated adult-use cannabis establishments, the locations of which may not be on the property of an airport, 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 adult-use 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 adult-use cannabis establishment was submitted to the Board or, if the proposed adult-use 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 adult-use cannabis establishment was submitted to the Board;

### **NRS 678B.322 1.(b)**

1. The Board shall not issue an adult-use cannabis establishment license for a retail cannabis consumption lounge pursuant to NRS 678B.250 unless:
  - (a) The applicant holds an adult-use cannabis establishment license for an adult-use cannabis retail store;
  - (b) The adult-use cannabis retail store for which the applicant holds an adult-use cannabis establishment license is operational; and



August 22, 2022

Cannabis Compliance Board  
Tyler Klimas, Executive Director  
700 E. Warm Springs Road, Suite 100  
Las Vegas, NV 89119

Good morning to the Cannabis Compliance Board and staff. My name is Scot Rutledge with Argentum Partners, and I am providing comments today on behalf of Green Life Productions (GLP).

In October of 2021 CCB inspectors visited the GLP cultivation site in Pahrump, NV and began the process of investigating GLP's growing methodology. The investigation is still ongoing, and after hundreds of hours of Time & Effort billing and numerous communications between the parties, we are hopefully close to reaching the conclusion with an approved final plan of correction.

I have been honored to work with Steve and Kouanin, and their compliance consultant Sheba Statham. I am impressed with the professionalism by which they have conducted themselves and have learned a great deal about what might be the most environmentally sustainable indoor cannabis cultivation facility in North America. Steve and Kouanin are passionate about



their farming methodology, and I believe should be praised by this board and this industry for their leadership in creating a more sustainable cannabis product.

We plan to present a petition based on findings that have arisen during this process where both we and the CCB staff have agreed that new definitions and further clarification in the regulations are needed. We appreciate the hard work put in by Chief Cronkhite and her team and recognize that the methodology used at GLP's cannabis cultivation is one that requires strong evidence of scientific data and comports with not only Nevada's regulations but aligns with federal regulations as well. It is our belief that GLP's standards and processes are beyond reproach, as is evidenced by their nearly flawless pass rate in testing and the high demand for their products in the Nevada cannabis marketplace.

To the issue of Time & Effort, of which there have been several bills delivered since November of 2021 and which my client has paid on time and in good faith. We are challenged by the lack of specificity and detail provided in these bills. In a consultation with Chief Cronkhite and Deputy AG Balducci on July 12<sup>th</sup> we were promised that detailed logs would be provided in a reasonable timeframe. It has been 42 days since that request was made and we have still not received those logs. And GLP continues to receive Time & Effort bills from the CCB.



We are requesting that those logs be provided prior to another bill being sent as we are concerned that there may be erroneous billing for staff research and education on methodologies and botanical and agricultural science that we believe should not be charged to a licensee. We plan to meet with Chief Chronkite again to review these logs once we have had a chance to review them.

Thank you for your time this morning and for the hard work and dedication on behalf of your staff.

Sincerely,

Scot Rutledge  
Argentum Partners  
702-561-9093  
scot@argentumnv.com



**CANNABIS  
COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. Box 1948  
CARSON CITY, NV 89701  
CCB.NV.GOV

# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 28269  
INVOICE DATE: 11/16/2021  
RECORD #: 38420410922892257960  
CE ID #: RC146  
AMOUNT DUE: \$1831.50  
DUE DATE: 12/1/2021

Questions about this invoice?  
Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov  
All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01				
NOTES:				
TE01				
NOTES:				
TE01	Time and Effort	16.00	\$1776.00	\$1776.00
NOTES:	Routine inspection 10/19; October billing. Work ongoing by C Shoemaker & F Harvey.			
			SUBTOTAL:	\$1831.50
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$1831.50

**SPECIAL INSTRUCTIONS:**

1. Please include the invoice number and record number on the memo line of the check.
2. Make all checks and money orders payable to: State of Nevada.
3. For Cash Payments, you may schedule an appointment by visiting [www.ccb.nv.gov](http://www.ccb.nv.gov).

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REMITTANCE SLIP

MAKE ALL CHECKS PAYABLE TO: STATE OF NEVADA

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CANNABIS COMPLIANCE BOARD  
P.O. BOX 1948  
CARSON CITY, NV 89701  
Attn: Payment Processing

*KV  
Amex*

INVOICE #: 28269  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$1831.50  
DUE DATE: 12/1/2021

AMOUNT ENCLOSED:



**CANNABIS  
COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. Box 1948  
CARSON CITY, NV 89701  
CCB.NV.GOV

# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 29529  
INVOICE DATE: 12/20/2021  
RECORD #: 38420410922892257960  
CE ID #: RC146  
AMOUNT DUE: \$3330.00  
DUE DATE: 1/4/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01	Time and Effort	30.00	\$3330.00	\$3330.00
NOTES:	Routine inspection 10/18/21 November billing; work ongoing by C Shoemaker & F Harvey.			
			SUBTOTAL:	\$3330.00
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$3330.00

**SPECIAL INSTRUCTIONS:**

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INVOICE #: 29529  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$3330.00  
DUE DATE: 1/4/2022

AMOUNT ENCLOSED:	
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# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 30421

INVOICE DATE: 1/13/2022

RECORD #: 38420410922892257960

CE ID #: RC146

AMOUNT DUE: \$2220.00

DUE DATE: 1/28/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01	Time and Effort	20.00	\$2220.00	\$2220.00
<b>NOTES:</b> Routine inspection 10/18/21; research, file compilation, Metrc review. December billing; work ongoing by C Shoemaker & F Harvey.				
			<b>SUBTOTAL:</b>	\$2220.00
			<b>CREDIT APPLIED:</b>	\$0.00
			<b>TOTAL DUE:</b>	\$2220.00

**SPECIAL INSTRUCTIONS:**

1. Please include the invoice number and record number on the memo line of the check.
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CARSON CITY, NV 89701  
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INVOICE #: 30421  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$2220.00  
DUE DATE: 1/28/2022

<b>AMOUNT ENCLOSED:</b>	
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CARSON CITY, NV 89701  
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# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 31679

INVOICE DATE: 2/17/2022

RECORD #: 38420410922892257960

CE ID #: RC146

AMOUNT DUE: \$3246.75

DUE DATE: 3/4/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCBlicensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01	Time and Effort	29.00	\$3219.00	\$3219.00
NOTES: Routine inspection 10/18/21; January 2022 billing. work ongoing by C Shoemaker & F Harvey.				

SUBTOTAL: \$3246.75

CREDIT APPLIED: \$0.00

TOTAL DUE: \$3246.75

**SPECIAL INSTRUCTIONS:**

1. Please include the invoice number and record number on the memo line of the check.
2. Make all checks and money orders payable to: State of Nevada.
3. For Cash Payments, you may schedule an appointment by visiting [www.ccb.nv.gov](http://www.ccb.nv.gov).

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P.O. BOX 1948  
CARSON CITY, NV 89701  
Attn: Payment Processing

INVOICE #: 31679  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$3246.75  
DUE DATE: 3/4/2022

AMOUNT ENCLOSED:



**CANNABIS  
COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. Box 1948  
CARSON CITY, NV 89701  
CCB.NV.GOV

# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 32725  
INVOICE DATE: 3/16/2022  
RECORD #: 38420410922892257960  
CE ID #: RC146  
AMOUNT DUE: \$2053.50  
DUE DATE: 3/31/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01				
NOTES:				
TE01	Time and Effort	18.00	\$1998.00	\$1998.00
NOTES:	Routine inspection 10/18/21 February 2022 billing; work ongoing by C Shoemaker & F Harvey.			
			SUBTOTAL:	\$2053.50
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$2053.50

**SPECIAL INSTRUCTIONS:**

1. Please include the invoice number and record number on the memo line of the check.
2. Make all checks and money orders payable to: State of Nevada.
3. For Cash Payments, you may schedule an appointment by visiting [www.ccb.nv.gov](http://www.ccb.nv.gov).

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P.O. BOX 1948  
CARSON CITY, NV 89701  
Attn: Payment Processing

INVOICE #: 32725  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$2053.50  
DUE DATE: 3/31/2022

AMOUNT ENCLOSED:	
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COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. Box 1948  
CARSON CITY, NV 89701  
CCB.NV.GOV

# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 33971

INVOICE DATE: 4/19/2022

RECORD #: 38420410922892257960

CE ID #: RC146

AMOUNT DUE: \$2997.00

DUE DATE: 5/4/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All other Fee Types: CCBlicensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01				
NOTES:				
TE01				
NOTES:				
TE01	Time and Effort	8.50	\$943.50	\$943.50
NOTES:	Supervisor review: SOD/UPOC completed 3/17/22 by K Cronkhite.			
TE01	Time and Effort	17.00	\$1887.00	\$1887.00
NOTES:	Routine inspection 10/18/21; March billing. Work ongoing by C Shoemaker & F Harvey.			
			SUBTOTAL:	\$2997.00
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$2997.00

**SPECIAL INSTRUCTIONS:**

1. Please include the invoice number and record number on the memo line of the check.
2. Make all checks and money orders payable to: State of Nevada.
3. For Cash Payments, you may schedule an appointment by visiting [www.ccb.nv.gov](http://www.ccb.nv.gov).

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P.O. BOX 1948  
CARSON CITY, NV 89701  
Attn: Payment Processing

INVOICE #: 33971  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$2997.00  
DUE DATE: 5/4/2022

AMOUNT ENCLOSED:



**CANNABIS  
COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. Box 1948  
CARSON CITY, NV 89701  
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# Invoice

BD

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 35716  
INVOICE DATE: 5/19/2022  
RECORD #: 38420410922892257960  
CE ID #: RC146  
AMOUNT DUE: \$4495.50  
DUE DATE: 6/3/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
NOTES:	[REDACTED]			
TE01	Time and Effort	16.00	\$1776.00	\$1776.00
NOTES:	Routine audit 10/18/21; April billing. Work ongoing by C Shoemaker & F Harvey.			
TE01	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
NOTES:	[REDACTED]			
			SUBTOTAL:	\$4495.50
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$4495.50

**SPECIAL INSTRUCTIONS:**

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2. Make all checks and money orders payable to: State of Nevada.
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CARSON CITY, NV 89701  
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INVOICE #: 35716  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$4495.50  
DUE DATE: 6/3/2022

AMOUNT ENCLOSED:	
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# Invoice

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

Time & Effort: CCBTimeAndEffort@ccb.nv.gov  
All Other Fee Types: CCB Licensing@ccb.nv.gov

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2. Make all checks and money orders payable to: State of Nevada.
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**MAKE ALL CHECKS PAYABLE TO: STATE OF NEVADA**

INVOICE #: 37228  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$8463.75  
DUE DATE: 7/8/2022

**AMOUNT ENCLOSED:**



**CANNABIS  
COMPLIANCE  
BOARD**  
STATE OF NEVADA

P.O. BOX 1948  
CARSON CITY, NV 89701  
CCB.NV.GOV

# Invoice

**BILLED TO:**

Kouanin Villa  
GREEN LIFE PRODUCTIONS LLC

INVOICE #: 38586  
INVOICE DATE: 7/20/2022  
RECORD #: 38420410922892257960  
CE ID #: RC146  
AMOUNT DUE: \$5244.75  
DUE DATE: 8/4/2022

Questions about this invoice?

Telephone: 775-687-6299

Time & Effort: CCBTimeAndEffort@ccb.nv.gov

All Other Fee Types: CCB Licensing@ccb.nv.gov

FEE CODE	DESCRIPTION	QTY	FEE AMOUNT	TOTAL
TE01				
NOTES:				
TE01				
NOTES:				
TE01				
NOTES:				
TE01				
NOTES:				
TE01				
NOTES:				
TE01	Time and Effort	10.50	\$1165.50	\$1165.50
NOTES:	Review plan of correction/UPOC. June billing. Work ongoing by D Entz.			
TE01	Time and Effort	25.00	\$2775.00	\$2775.00
NOTES:	Routine inspection 10/18/21; June billing. Research SOPs, compost requirements/nat'l standards, supervisor review, POC review, correspondence. Work ongoing by C Shoemaker & F Harvey.			
			SUBTOTAL:	\$5244.75
			CREDIT APPLIED:	\$0.00
			TOTAL DUE:	\$5244.75

**SPECIAL INSTRUCTIONS:**

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REMITTANCE SLIP

MAKE ALL CHECKS PAYABLE TO: STATE OF NEVADA

STATE OF NEVADA  
CANNABIS COMPLIANCE BOARD  
P.O. BOX 1948  
CARSON CITY, NV 89701  
Attn: Payment Processing

INVOICE #: 38586  
RECORD #: 38420410922892257960  
CE ID#: RC146  
AMOUNT DUE: \$5244.75  
DUE DATE: 8/4/2022

AMOUNT ENCLOSED:	
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Public Comment

8.23.22

Good morning my name is Cristina Ulman I am the Co-founder and President of the Chamber of Cannabis, Nevada's largest cannabis business trade organization.

I come before you representing over 400 industry professionals, 70 cannabis companies and numerous activists building the Nevada market to what it is today.

As we finalize consumption venue regulations and create new commerce and social norms for adults living and visiting Nevada, we want to thank you for the transparent and collaborative process in how the regulations have been workshopped and decided on. The development of these new privileged licenses serves as a prime example for how activists, professionals, cannabis companies, regulators and political leaders can work side by side to accomplish a complex goal.

We hope after seeing the success of this process it can be emulated throughout all the sectors of the industry so that the experts and the regulators are working together to create a more viable and sustainable market.... because right now it is not headed in that direction. As revenues continue to decline and flower becomes more and more abundant the regulations that are created now will not only impact the market today, but it could very well impact the market in the years to come.

We respectfully ask that the board consider creating more subcommittees with industry experts that can serve as guides and share their knowledge and solutions as we all try to create and operate a safe and thriving cannabis space.

The professionals building the industry want to be equipped with the resources we need to do the job compliantly and to the best of the ability. We shouldn't be scared to ask a question in fear the CCB will come knocking at their door and site them with an extremely large fine for intending to follow the rules. We cannot continue on the path we are on and expect to see the market and moral shift to more positive results.

Although the CCB's is not responsible for the success of the cannabis businesses in Nevada the boards regulations will directly impact the economic development of the market.

We hope you take these suggestions and many others we have offered into consideration immediately so we truly may be the "Gold Standard State."

Thank you

Cristina Ulman

Chamber of Cannabis President





August 22, 2022

The Honorable Michael Douglas, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, NV 89119

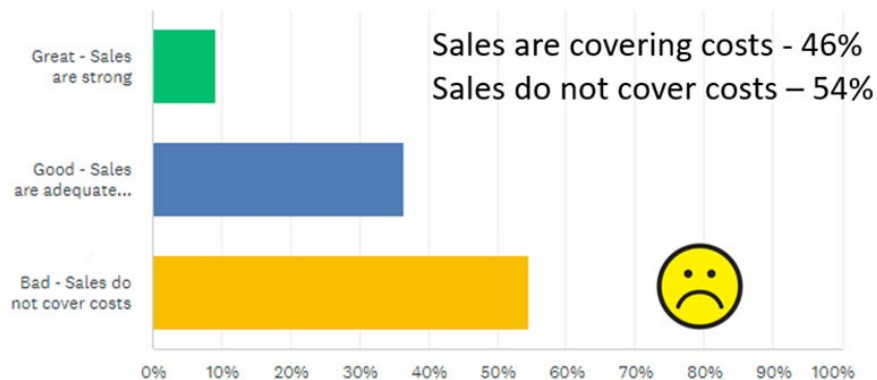
Re: State of the Industry

Dear Chair Douglas,

The Las Vegas Medical Marijuana Association has formally and informally surveyed its members. Many in the industry are having financial difficulties with sales down 20% from the previous year, more competition, and the impact of 280e.

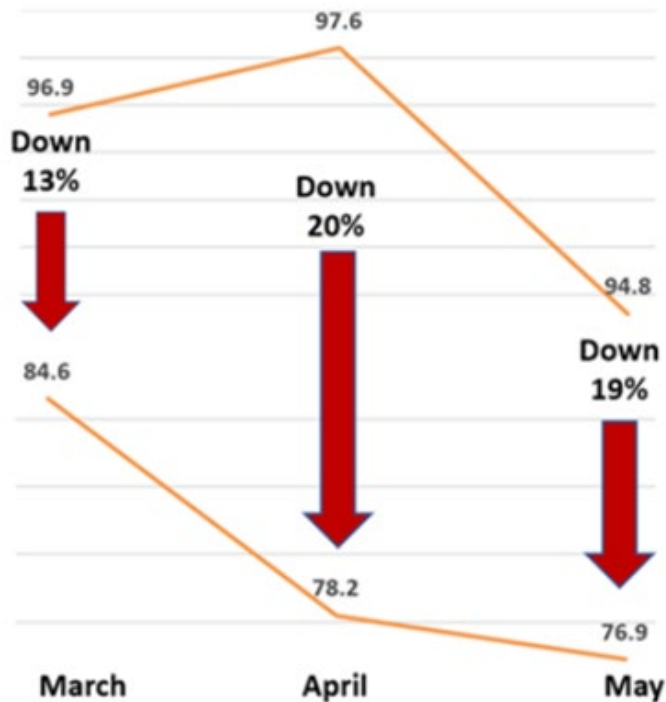
### How Is Your Financial Situation?

Answered: 11 Skipped: 0



ANSWER CHOICES	RESPONSES	
Great - Sales are strong	9.09%	1
Good - Sales are adequate enough to cover costs	36.36%	4
Bad - Sales do not cover costs	54.55%	6
TOTAL		11

### March, April, May 2022 Compared to 2021 - Down 13% to 20%



When comparing the March, April & May of [2022](#) to the same months of [2021](#), the trend is a drop in revenues of 20% compared to 2021. The drop in sales is due to the cost of gas and food going up. [Info.](#)

I would like thank the board for allowing me to provide this information.

Sincerely,

John Laub  
President  
Las Vegas Medical Marijuana Association