
From: Dan S
Sent: Wednesday, September 6, 2023 7:01 AM
To: CAC Meetings
Subject: public suggestion/comment for Subcommittee on Federal Rescheduling
Attachments: Dan's recommendation .pdf

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Hello,

For the record, Dan Steele is my name, **attached** is my letter of recommendation from UNR school of med.

I wanted to talk on things the Fed should regulate with regard to their recent plan to reschedule/deschedule.

Synthetic cannabinoids are important to regulate heavily with federal support. These include:

1. Hemp CBD conversion to other cannabinoids (THC).
2. Yeast that is GMO to produce cannabinoids (this is currently not practical but research is ongoing in universities to make this more efficient).

These "feed stock/synthetic/engineered" cannabinoids can hinder growth of already existing businesses. They should be reserved for federally approved organizations due to their ability to effect supply and demand, and consumer safety. Its possible that a significant portion of black market vape cartridges and edible gummies, are from hemp CBD conversion.

Currently there are companies who operate in a loophole, because the legal definition of THC, does not include synthetic/engineered.

Also, **There should be a federal agency/laboratory that monitors compliance of cannabis analytical laboratories.**

I once worked in a government-regulated, insurance-funded, clinical-toxicology lab. Which operated with disregard for regulations, compliance, public health, and a code of ethics. So I can only imagine what is being missed in a cannabis analytical laboratory.

That's all I have for right now.

Best regards

April 21, 2021

To whom it may concern:

It is my great pleasure to write this letter of recommendation for Daniel Steele's application for the Molecular Biology lab.

I became acquainted with Dan while he was an undergraduate student from the University of Nevada Reno for the academic year 2020-2021. Dan joined The Department of Physiology and Cell Biology, University of Nevada School of Medicine as part of an undergraduate research program to perform research. I was a direct advisor for his project.

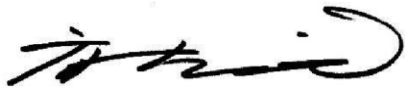
During the time that he spent in our laboratory, Dan collected a significant amount of original research data examining the characterization of fibrosis related genes in the bladder. He was capable of refining numerous technical problems in experimental design and analysis. He made enormous progress in terms of fibrosis-related pathways in bladder inflammation using murine animal model and organ culture systems. He found the changes in activity of *Mmp*, *Timp* and *Col1a1* expression in suburothelial PDGFR α ⁺ cells during bladder inflammation. These findings will present at the American Urology Association (AUA) meeting with functional data supports. Furthermore, the data that he individually collected during the year that he spent in our Lab is currently being written up as a NIH research grant proposal.

As a professor within the Department of Physiology and Cell Biology, I have advised approximately 27 students. I would clearly put Dan in the top 5% of all the students that have taken part in our lab program. During independent study with me (fall semester, 2020), it was evident that he read the literature widely and was able to discuss complex mechanisms more so as a colleague rather than a student. He is highly motivated, thorough, careful and independent individual. His desire to improve techniques to better answer a particular hypothesis was compelling. He displays incredible insight, enthusiasm and creativity to plan and perform extremely difficult experiments. Dan pushed himself to excel in research with very accommodating to other students and technical staff alike. On numerous occasions my Research Associates would comment that Dan was a delight to work with.

Dan's abilities to date convince me that he will make substantial contributions in the Molecular Lab if given the opportunity. I therefore give him my strongest possible recommendation for an outstanding candidate.

Please feel free to contact me if I can provide more information.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. Koh', with a large, sweeping flourish at the end.

Sang Don Koh, MD,Ph.D.

Professor

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September 14, 2023

Dear Chair Balducci and Sub-Committee Members,

Based on the discussion that unfolded over the course of the last subcommittee meeting and the language in the agenda for this meeting, I would strongly recommend that the subcommittee re-evaluate its interpretation of the legislation that mandated its formation.

As stated in the digest for Senate Bill 277 (formatted for emphasis):

*“Section 16 of this bill **requires** the Cannabis Advisory Commission to conduct a study concerning the potential effects of the **removal** of cannabis from the list of controlled substances included in schedule I pursuant to the **federal Controlled Substances Act or the state Uniform Controlled Substances Act on the cannabis industry in this State.**”*

The recent scientific conclusions and related scheduling recommendations from the Secretary of Health & Human Services (HHS) have the potential to significantly impact cannabis operators in Nevada so this should certainly be considered by this subcommittee but it should not be the primary focus.

As I’m sure you are aware, the HHS conducted this study in response to the [Statement from President Biden on Marijuana Reform](#) in October 2022.

Unlike President Biden’s directive – which asked HHS to review *how* marijuana (cannabis) is scheduled and classified – SB 277 requires that this subcommittee study the *removal* of cannabis from this type of classification altogether.

The Controlled Substances Act (CSA) was introduced in 1970. Since then, all but 12 states have legalized access to high-THC marijuana in some form and each state has its own regulatory and legal framework legal cannabis that is independent from federal laws and regulations.

While there are some benefits of rescheduling cannabis from Schedule I to Schedule III at the federal level – namely for 280e tax exemptions and for research – the reality of what this might mean for the operators that operate legally at the state level could be incredibly harmful.

Unfortunately, the DEA’s interim final ruling on the recent HHS recommendation will be completely independent of any findings this subcommittee, or any state agency, produces.



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Therefore, I strongly believe it would be a better use of the committee's time to focus on scheduling at the state level, where meaningful change is actually possible.

In the state of Nevada, we have Nevada's Schedule of Controlled Substances in Nevada Administrative Code (NAC). Under Item 5 in NAC 453.510, classifies "any material, compound, mixture or preparation which contains any quantity of ... hallucinogenic substances, including, without limitation, their salts, isomers and salts of isomers, whenever the existence of such salts, isomers and salts of isomers is possible within the specific chemical designation" made from "marijuana" as a Schedule I substance.

Exactly one year ago, Nevada District Judge Joe Hardy Jr. ruled that the Nevada Board of Pharmacy's scheduling was unconstitutional because, in 2000, Nevadans voted to amend the state constitution to legalize medical marijuana (cannabis).

Nearly 23 years after this constitutional amendment passed, the Nevada Board of Pharmacy has not changed its classification of marijuana (cannabis) and the schedule of this substance that provides millions of dollars in state tax revenues remains unchanged.

The Nevada Administrative Code (NAC) is the codified, administrative regulations of the Executive Branch.

All members of the Cannabis Control Board and 8 of the 12 members of the Cannabis Advisory Commission are appointed by the Governor, the highest member of the Executive Branch.

A member of the state's Judicial Branch has deemed the current status unconstitutional.

Our state's Legislative Branch has given the members of this subcommittee the power to produce compelling evidence for the removal of "marijuana" (cannabis) from NAC453.510 altogether.

Rather than researching and delivering a report on a federal problem that no state agency or regulatory body can solve, I urge this subcommittee to devote its resources to researching the problem in our state so that we can use the findings to implement a real solution.

Sincerely,

Abby Kaufmann

From: CAC Meetings
To: Daniel Asarch
Subject: RE: Public comment for reschedule

From: Daniel Asarch
Sent: Friday, September 15, 2023 9:17 AM
To: CAC Meetings <CACmeetings@ccb.nv.gov>
Subject: Re: Public comment for reschedule

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Email for public comment

Hi my name is Daniel Asarch,

I am a NV pharmacist and medical patient. I believe that cannabis should be descheduled and not rescheduled to schedule 3. The magic is out of the bottle and cannot be forced back in. Schedule 3 will put cannabis in the hands of Pharma and patents will be secured. Also, even though I would love to dispense cannabis in my practice I want everyone to have access to it that's needs it and doesn't want to be vilified for it. It will be bad for patients, small businesses, and people will still be thrown in jail/ticketed for it. Descheduling will help level the playing field and allow mom and pop shops/business to prosper helping everyday people support their family and help raise revenue for the state and city via taxes. Please support for descheduling.