

**From:** [Paul Larsen](#)  
**To:** [Tyler Klimas](#); [CCB Licensing](#); [Amber Virkler](#); [mmiles@ccb.nv.gov](mailto:mmiles@ccb.nv.gov); [David Staley](#)  
**Cc:** [Rusty Graf](#); [Diane Meeter](#); [Jerri Hunsaker](#)  
**Subject:** The Hempire Company LLC: Letter Opposing Consideration of Kevin Singer Application at November 21 CCB hearing  
**Date:** Monday, November 20, 2023 7:34:25 PM  
**Attachments:** [November 20 letter to CCB re November 21 hearing.pdf](#)

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Chair Guzman Fralick, Deputy Director Miles, Chief Staley, and others to whom it may concern:

Attached please find the Letter from Black & Wadhams, as legal counsel to The Hempire Company LLC, regarding the special meeting of the Cannabis Compliance Board (CCB) scheduled for November 21, 2023 at 10:30AM. We respectfully request this letter be placed in the record for Agenda Item II, and will be available to elaborate at the hearing should need be.

Please contact me at 702.308.6153 if you have any questions or concerns.

Paul Larsen  
BLACK & WADHAMS  
702.308.6153

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(1966-2020)

November 20, 2023

***Sent via email:***

***tklimas@ccb.nv.gov; ccblicensing@ccb.nv.gov;***  
***avirkler@ccb.nv.gov; mmiles@ccb.nv.gov; staleyd@ccb.nv.gov***

Adriana Guzman Fralick, Chair  
Michael Miles, Deputy Executive Director  
David Staley, Chief, Investigations  
Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: The Hempire Company LLC (License Nos. C184, RC842, P120, RP120)

Dear Chair Guzman Fralick, Deputy Director Miles and Chief Staley:

This law firm represents The Hempire Company LLC ("Hempire") with regard to the litigation referenced in Agenda Item II of your November 21, 2023 Agenda: NVCHI Holdings, LLC v. Nevada AG Co., LLC, et al, Nevada Eighth Judicial District Court Case No. A-23-880387-B (the "litigation").

In our capacity as counsel for Hempire in the Litigation, we respectfully submit our opposition to the consideration of Kevin Singer's application for a Cannabis Registration Card as a "Court Appointed Receiver" (the "Application") at this time, as no contested hearing has been held in the District Court and none is scheduled in the Litigation until December 11, 2023. Rather, a Temporary Restraining Order was issued on an *ex parte* basis on November 6, with the court order explicitly stating that "this court will conduct a hearing on November 20, 2023 [now continued to December 11, 2023] to determine whether preliminary injunctive relief shall be extended ***and to confirm the status of the receiver appointed herein.***" Order in NVCHI Holdings, LLC v. Nevada AG Co., LLC, et al, Nevada Eighth Judicial District Court Case No. A-23-880387-B dated November 6, 2023 at Page 16, lines 15-16 (emphasis added). Please note that Hempire will attend the December 11 hearing in the Litigation, and will vigorously oppose the extension of injunctive relief and appointment of a receiver.

Accordingly, there is no urgency to this matter requiring the noticed November 21 CCB hearing to consider the Application, and certainly no basis to consider the matter on an emergency

basis. Indeed, given the possibility that the District Court may *not* grant preliminary injunctive relief after the contested hearing on December 11, the CCB's consideration of the Application at this time is untimely and inappropriate. *IF* a reiver is confirmed after the contested hearing in the litigation, the CCB would still have sufficient time to review and consider the Application at that time.

On this basis, Hempire respectfully opposes any action on the Application at the November 21 CCB hearing, and respectfully requests the hearing for the Application be delayed until after the Judge Mark Denton has ruled at the December 11 hearing.

Should you have any questions or concerns, please do not hesitate to contact our office, and thank you for your kind consideration of this request.

Respectfully,

**BLACK & WADHAMS**

A handwritten signature in black ink, appearing to read 'EL', is written over a large, stylized, handwritten letter 'P' that is part of the signature.

Paul E. Larsen, Esq.

PEL/jh

cc: Client

For the record Dan Steele.

Speaking as a member of the public, I just wanted to use this opportunity to thank Executive Director Klimas. I have only attended meetings for a short period of time, and it's apparent the CCB works hard to stay ahead of the curve in the complex matrix that is 'cannabis'. The staff, its members, and executive team have been directed phenomenally. And are making great changes on behalf of the public. So thank you Director Klimas for your efforts to an industry that means a lot to many people.

Best Regards,  
Dan