

ARGENTUM PARTNERS

January 23, 2024

Cannabis Compliance Board
Director James Humm

Director Humm,

Please accept for the board's consideration the following changes to NCCR Regulation 5.041 on behalf of Argentum Partners. The request allows for an educational and/or trade show event to request a waiver.

My best,
Scot Rutledge



Suggested revision to NCCR Regulation 5.041

(h) The physical address where the proposed temporary cannabis event will be located and;

(1) An attestation wherein the applicant agrees and understands that the actual location, when determined, where the proposed temporary cannabis event will be conducting business must not be within:

(I) 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 temporary cannabis event permit was submitted to the Board;

(II) 300 feet of a community facility that existed on the date on which the application for the proposed temporary cannabis event permit was submitted to the Board; and

(III) if located in a county whose population is 100,000 or more, within 1,500 feet of an establishment that holds a nonrestricted gaming license.

(2) An applicant may request a waiver of the attestation and distance requirements in section (h)(1) if the proposed event is a cannabis business trade show and the proposed venue is primarily controlled by public officials. ~~While the physical address may change prior to the proposed temporary cannabis event, the address stated on the application will be used to identify the locality where the temporary cannabis event must be located.~~

~~(3) Once a local jurisdiction is selected by the applicant the applicant is limited to locations within said local jurisdiction.~~

From: [Josh Sepulveda](#)
To: [CCB Regulations](#)
Subject: RE: Proposed Changes to NCCR - Events, 1/31/2024
Date: Wednesday, January 31, 2024 12:21:37 PM
Attachments: [Outlook-s15vrs55.png](#)

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To Whom It May Concern,

Hi, my name is Josh Sepulveda and I'm the Associate Buyer for Green Thumb Industries, NV. As a worker and member of the cannabis community, I'm constantly looking for ways to help move the industry forward.

I think allowing temporary cannabis events and consumption would have immense value to our industry in Nevada, economically and otherwise.

Thank you for considering these changes to the current regulations.

Sincerely,



Josh Sepulveda
Associate Buyer, NV/CA

Schedule a Shipment at NV RISE & Cookies on the Strip: [HERE](#)

Schedule a Shipment at CA RISE Pasadena: [HERE](#)

Sara Adams

From: Chris Wren
Sent: Monday, October 2, 2023 2:21 PM
To: Sara Adams
Subject: THC testing by dry weight

Sara,

One more thing I'd like to add to our list of requests from the CCB although it's not a label request is to start testing THC by dry weight rather than as-received weight.

Testing by Dry is the standard in most other states, CA being one. Because of this, customers are falsely led into thinking NV products have a lower potency.

Some people try and cheat the system by artificially drying their test samples to boost THC.

All cultivators send their samples in at different moisture levels so the current NV system allows for non standard results across the spectrum.

The moisture content in the product a customer consumes will vary based on the time from testing and would not be accurate in terms of what the lab initially reported.

If all samples are tested by dry weight, everyone is at the same base level of 0% moisture and the results would be more consistent and accurate.

Mass of THC detected by Instrument / Mass of sample=% THC

On an as received basis, the Mass includes the weight of the water
On a dry weight basis, the mass is only the weight of the THC and the flower.

Condition:

1 bud cannabis sample @ 14% moisture with 230 actual MG of THC, total sample mass 1000mg

THC result 1= 230mg THC, 140mg of water, 630mg of Plant matter, $230/1000=23\%$ THC-NV As received—
1000mg sample mass

THC result 2= 230mg THC, 140mg of water, 630mg of Plant matter, $230/860=26.7\%$ THC—CA By dry weight---
1000mg sample mass

If I hypothetically left that same 1g bud that was tested above on the counter for a week instead of testing it, then sent it to the lab, it would have lost moisture weight. Let's say half for arguments sake

Condition:

same cannabis sample @ 7% moisture with 230 actual MG of THC in the sample

THC result 1= 230mg THC, 70mg of water, 630mg of Plant matter, $230/930= 24.7\%$ THC--930g sample mass

THC result 2= 230mg THC, 70mg of water, 630mg of Plant matter, $230/860=26.7\%$ THC--930g sample mass

The moral of the story is the same bud, in NV can range from 23-27% based on how wet it is, while the bud in California will have the same THC% regardless of how wet it is.

CA

Procedure A. The moisture content of dried flower, including pre-rolls, shall be tested and reported as required by California Code of Regulations, title 4, section 15717. The percentage moisture content shall be used to calculate the **dry-weight percent cannabinoid** by the equation specified in section IX.A.

NV

6. As used in this section, "as received" means the unaltered state in which a sample was collected, without any processing or conditioning, which accounts for all mass, including moisture content. A cannabis independent testing laboratory shall not report the results of usable cannabis on a dry weight basis.

CHRIS WREN

VP OF OPERATIONS

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