



JOE LOMBARDO  
*Governor*

## CANNABIS COMPLIANCE BOARD STATE OF NEVADA

ccb.nv.gov  
CARSON CITY OFFICE  
3850 Arrowhead Drive, Suite 100  
Carson City, Nevada 89706  
Main Line: (775) 687-6299

LAS VEGAS OFFICE  
700 East Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

JAMES HUMM  
*Executive Director*

MICHAEL MILES  
*Deputy Director*

ADRIANA GUZMÁN FRALICK  
*Chair*

February 14, 2025

### Update to Monopoly Analysis

This notice is to provide updated guidance regarding how to determine if a potential monopoly exists when completing the “No Monopoly Attestation” requirement for a Transfer of Interest, or any other application.

Monopoly requirements were previously covered by NRS 678B.230 (medical) and NRS 678B.270 (adult-use). However, SB 277, passed in 2023 and codified in NRS 678B.215, provided for the combination of medical and adult-use cannabis licenses, essentially eliminating, in most cases, medical licenses all together and making NRS 678B.230 moot. The conversion of medical cannabis licenses into all-inclusive adult-use cannabis licenses was completed on December 31, 2024, and all dual licenses are now Adult-Use Cannabis Establishment Licenses, with the authority to sell both medical and adult-use cannabis.

As a result, NRS 678B.270 is the only Statute covering Monopoly provisions for cannabis licenses as follows:

#### **NRS 678B.270 Licensing of adult-use cannabis establishments in larger counties: Limitation on number of licenses issued to any one person; exception.**

1. Except as otherwise provided in this section, to prevent monopolistic practices, the Board shall ensure, in a county whose population is 100,000 or more, that it does not issue, to any one person, group of persons or entity, the greater of:
  - (a) One adult-use cannabis establishment license; or
  - (b) More than 10 percent of the adult-use cannabis establishment licenses otherwise allocable in the county.
2. The provisions of this section do not apply to an adult-use cannabis establishment license for a retail cannabis consumption lounge or an independent cannabis consumption lounge.

Distribution licenses are considered adult-use only because they were licensed in connection with the legalization of adult-use cannabis on July 1, 2017. In addition, NRS 678B.270(2) excludes all cannabis consumption lounge licenses from the monopoly calculations.

The two Nevada counties with populations over 100,000 are Washoe County and Clark County.

Cannabis establishment licenses include cultivation, production, dispensary/retail, distributor, and laboratory, as well as all licenses that have been surrendered or are in provisional/conditional status, as those licenses have been issued.

CCB files show the following total number of medical and adult-use licenses in Clark and Washoe Counties, as of January 1, 2025:

Clark County

Adult-Use Licenses – 331

Washoe County

Adult-Use Licenses - 79

As a result, for example, a licensee with 15 total licenses –

- four (4) adult-use cultivation (2 in Washoe and 2 in Clark),
- four (4) adult-use production (2 in Washoe and 2 in Clark),
- two (2) distributor (1 in Washoe and 1 in Clark), and
- five (5) dispensaries (2 adult-use in Washoe and 3 adult-use in Clark)

would be calculated as follows:

Licensee Clark County

Adult-Use Licenses –  $8/331=2.4\%$

Licensee Washoe County

Adult-Use Licenses –  $7/79=8.9\%$

These calculations show that the licensee is below the 10% threshold in all scenarios and demonstrates that it would not have a monopoly in either Clark or Washoe County.

Based on the above calculations, the licensee would be able to affirmatively execute a “No Monopoly Attestation.” Licensees are required to provide their monopoly calculations within the “No Monopoly Attestation” they are required to submit.

The following charts detail the distribution of all allocated licenses that exist in Clark County and Washoe County and are inclusive of expired, rescinded, revoked, surrendered and active license as of January 1, 2025.

**CLARK COUNTY**

License Type	Clark County Total	Unincorporated Clark	North Las Vegas	Las Vegas	Henderson	Mesquite
Adult-Use Dispensary	80	36	9	23	11	1
Adult-Use Cultivation	112	53	47	5	6	1
Adult-Use Production	76	36	34	1	4	1
Adult-Use Laboratory	9	4	0	5	0	0
Adult-Use Distribution	54	36	15	1	0	2
<b>Total</b>	<b>331</b>	<b>165</b>	<b>104</b>	<b>35</b>	<b>21</b>	<b>5</b>

## WASHOE COUNTY

License Type	Washoe County Total	Unincorporated Washoe	Reno	Sparks
Adult-Use Dispensary	20	6	10	4
Adult-Use Cultivation	27	7	11	9
Adult-Use Production	21	5	9	7
Adult-Use Laboratory	2	0	0	2
Adult-Use Distribution	9	0	6	3
<b>Total</b>	<b>79</b>	<b>18</b>	<b>36</b>	<b>25</b>

Questions regarding this notice should be directed to [CCBinvestigations@ccb.nv.gov](mailto:CCBinvestigations@ccb.nv.gov).

*David Staley*  
*Division Chief - Investigations*