

**NEVADA WELLNESS CENTER, LLC –
NEVADA WELLNESS CENTER WEST, LLC
SILVER BLACK ATTACK, LLC.**

October 26, 2025

To:
Nevada Cannabis Compliance Board
Attn: Executive Director
Las Vegas, NV

From:
Frank Hawkins
Nevada Wellness Center LLC / Nevada Wellness Center West LLC
Las Vegas, Nevada

Subject: Formal Opposition to Proposed Changes to NCCR 1, 4 & 5 (Docket 10-21-25)

Introduction

I submit this letter in formal opposition to the Cannabis Compliance Board’s proposed amendments to Nevada Cannabis Compliance Regulations (NCCR) 1, 4 and 5. As a licensed operator in the Nevada cannabis industry for more than ten years, I have complied with every statutory and regulatory requirement since the industry’s inception. The proposed changes fundamentally alter the balance between fair regulation and unchecked administrative power.

1. Expansion of Unchecked Authority

Sections 1.055 – 1.120 introduce vague new definitions—“Imminent Health Hazard,” “Administrative Hold Order,” and “Summary Suspension.” These undefined terms allow CCB agents to suspend, restrict, or close licensed operations without verifiable evidence or hearing. Such discretion contradicts the principle of due process and exposes lawful

operators to arbitrary enforcement.

Requested Action: Remove or narrowly define these terms. Require clear, measurable criteria and immediate right of appeal.

2. Imminent Health Hazard – § 4.065

This section allows immediate shutdowns for any condition an inspector believes may pose a risk. Minor, correctable events—temporary HVAC failure, short power interruption, or routine pest control—could now trigger full operational closure.

Requested Action: Require third-party verification before any shutdown. Allow at least 24 hours for correction before enforcement.

3. Administrative Hold Orders – § 4.067

This proposal authorizes CCB to freeze product movement for 30 days (extendable). This action destroys cash flow and product integrity before any violation is confirmed.

Requested Action: Restrict hold orders to confirmed contamination or verified diversion cases. Mandate prompt hearing and compensation for wrongful holds.

4. Summary Suspension – § 4.103

Granting the Board power to summarily suspend licenses based on “belief” undermines all procedural safeguards. A single inspector could close a multimillion-dollar business instantly, even if later proven wrong.

Requested Action: Require written factual findings, 48-hour licensee response, and automatic reinstatement unless hearing confirms danger.

5. Inspection Access – § 4.075

This section demands unrestricted, unscheduled entry to any licensed facility. Such authority invites harassment and disrupts normal business operations.

Requested Action: Require advance written notice for non-emergency inspections and specify limited hours of access.

6. Category I Violations – § 4.033

Automatic revocation for a wide range of alleged violations removes proportional discipline and discourages transparency.

Requested Action: Reinstate hearing discretion and tiered penalty framework based on severity and intent.

7. Administrative Burden and Deadlines – §§ 5.030, 5.038–5.039, 5.042

The two-day response rule, shortened 120-day suitability window, and new “public interest” denial clause impose unreasonable administrative pressure and grant subjective power to reject or revoke licenses.

Requested Action: Extend response window to 10 business days. Restore 180 days + automatic 60-day extension for suitability filings. Delete or narrowly define “public interest” to objective safety-based criteria.

8. Economic and Legal Consequences

These cumulative amendments will:

- Increase compliance costs and insurance exposure.
- Enable arbitrary closures without independent oversight.
- Undermine investor confidence in Nevada’s regulated market.
- Penalize long-standing compliant operators while doing nothing to improve consumer safety.

Conclusion

The proposed revisions transfer excessive power from licensed businesses to an unelected enforcement agency. They erode due process, create financial instability, and contradict the original legislative intent of regulated fairness.

I respectfully urge the Board to withdraw or amend these provisions and convene an industry stakeholder working group—including long-time Nevada licensees—to develop balanced, evidence-based rules that protect both consumers and legitimate operators.

Sincerely,

Frank Hawkins
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Nevada Wellness Center West LLC
Las Vegas, Nevada