

Nevada Cannabis Compliance Board

Regulatory Workshop

Regulations 1, 4, and 5

December 2, 2025

Minutes

The Nevada Cannabis Compliance Board (CCB) held a public workshop at 700 E. Warm Springs Road, Suite 150, Las Vegas, Nevada beginning at 10:00 a.m. on December 2, 2025.

Deputy Director Michael Miles called the meeting to order. Division Chief – Health & Safety, Kara Cronkhite and Chief of Administration, Steve Gilbert were present on behalf of the CCB in Las Vegas.

Deputy Director Miles noted this workshop will cover regulations 1 through 5 and an upcoming workshop will cover regulations 6 through 15.

Instructions to join the meeting via Zoom for public comment were read aloud.

I. Public Comment

There were no public comments in Las Vegas or online.

II. Proposed Amendments and additions to Nevada Cannabis Compliance Regulations 1 through 5

Deputy Director Miles introduced Kara Cronkhite, Division Chief – Health & Safety and she provided a brief overview of updates made to the following regulations:

A. Regulation 1. Issuance of Regulations; Construction; Definitions:

1. **NCCR 1.082.** the definition for “Derived” was stricken from the regulation because it exists in statute.
2. **NCCR 1.110.** “Imminent health hazard” is defined based on changes to the statute made during the 2025 legislative session.
3. **NCCR 1.115.** the definition for “Label” was stricken from the regulation because it exists in statute.
4. **NCCR 1.135.** the definition for “Packaging” was stricken from the regulation because it exists in statute.

Deputy Director Miles asked for any public comments regarding Regulation 1.

There were no public comments in person or online.

B. Regulation 2. Cannabis Compliance Board: Organization and Administration

Deputy Director Miles asked for any public comments regarding Regulation 2.

There were no public comments in person or online.

C. Regulation 3. Cannabis Advisory Commission: Organization and Administration

Deputy Director Miles asked for any public comments regarding Regulation 3.

There were no public comments in person or online.

D. Regulation 4. Disciplinary and Other Proceedings Before the Board

Deputy Director Miles summarized changes to NCCR 4, noting updates include the addition of “hearing officer” and “employed by the board” throughout and procedural change to disciplinary hearings which will now be held before the administrative law judge who will issue the order which can be appealed to the board. He noted that major changes were made to 4.065, 4.067 and 4.105.

1. **NCCR 4.012.** “Time” defined
2. **NCCR 4.033.** Category I Violations.
3. **NCCR 4.035.** Category II Violations.
4. **NCCR 4.040.** Category III Violations.
5. **NCCR 4.050.** Category IV Violations.
6. **NCCR 4.055.** Category V Violations.
7. **NCCR 4.060.** Category VI Violations.
8. **NCCR 4.061.** Category VII Violations.
9. **NCCR 4.065.** Imminent Health Hazard. Chief Cronkhite summarized the changes, stating that 4.065 takes information from guidance documents and other public health agencies and puts them into regulation for self-closures or required board issued closures for operating during an imminent health hazard, and how to become operational.
10. **NCCR 4.067.** Administrative Hold Order. Chief Cronkhite stated that 4.067 provides procedures for an administrative hold order which were included in statute during the 2025 legislative session.
11. **NCCR 4.095.** Early case conference and hearing. Deputy Director Miles explained that this regulation was adjusted to add “hearing officer” and extension abilities for early case conferences.
12. **NCCR 4.105.** Grounds for summary suspension; notice; request for hearing. Chief Cronkhite noted updates to procedures for suspension of operations were made as outlined in the changes made to statute during the 2025 legislative session.
13. **NCCR 4.110.** Discovery: mandatory exchanges. Deputy Director Miles said deletions were made due to statutory changes.
14. **NCCR 4.130.** Subpoenas. Deputy Director Miles explained that this regulation was adjusted to add “hearing officer” instead of “executive assistant” to issue subpoenas
15. **NCCR 4.135.** Disposition of charges: Adjudication by Board. Deputy Director Miles commented this regulation was removed in its entirety because there is no longer adjudication in front of the board for disciplinary matters.
16. **NCCR 4.137.** Settlement of Disciplinary Actions and/or Contested Cases.
17. **NCCR 4.140.** Declaratory orders and advisory opinions.
18. **NCCR 4.145.** Adoption, amendment or repeal of a regulation.

Deputy Director Miles asked for public comments regarding Regulation 4.

Layne Martin, on behalf of the Nevada Cannabis Association deferred comments regarding imminent health hazards to Amanda Connor. Ms. Martin addressed 4.067 Administrative Hold Orders and reminded CCB that she provided a detailed letter with comments and wanted to ensure the regulation aligns with Senate Bill 168: that a hold may be issued only when a product fails to meet a statutory or regulatory requirement and constitutes a substantial hazard to public health. She expressed concerns about changes to some of the language and referred to her submitted letter.

Continuing, Ms. Martin discussed 4.105 and said it should not refer to a section of the assembly bill, but rather, circumstances should be provided in detail, so licensees are not required to look at legislative documents.

Chief Cronkhite explained that redundancies in regulations are returned by the legislative counsel bureau, preventing everything in statute to be included in the regulations.

Amanda Connor, of Connor and Conner stated her belief that the proposed regulations assumed implementation of the regulations considered at the November 20, 2025 meeting and saw a different definition for “day” in NCCR1 from what is in proposed regulation 4.012. She expressed concern this could cause confusion and asked for a consistent definition of “day” in 4.012. Also, she spoke on 4.065 and said confusion arises due to subsection 3. Ms. Connor provided hypothetical scenarios where this could cause issues and asked for clarification on circumstances which would require licensees to remain closed due to imminent health hazards.

Ms. Connor agreed with Ms. Martin regarding 4.067, stating her belief that many of the selected language changes are outside of statutory authority, and should instead be consistent with statutory language. In closing, Ms. Connor noted that SB 168 required a notice and the regulation does not.

Chief Cronkhite agreed that clarification is good and said 4.065 is not meant to include self-closures, but rather if a CCB agent closes the facility, approval is needed to reopen. She said 4.067 will be reviewed with deputy attorneys general to determine if revisions are required based on comments.

Deputy Director Miles asked for any additional public comments regarding Regulation 4. There were no additional public comments in person or online.

E. Regulation 5. Licensing, Background Checks, and Registration Cards

Deputy Director Miles introduced Steve Gilbert, Chief of Administration. Chief Gilbert provided a brief overview of updates made to the following regulations, noting the proposed amendments combine application requirements outlined in NRS 678.240 for medical and NRS 678B.280 for adult use:

1. **NCCR 5.025.** Submission of application by person who holds medical cannabis establishment registration certificate for cannabis establishment of same type; issuance of license; refund of fee if application not approved.
2. **NCCR 5.030.** Submission of application by person who holds medical cannabis establishment registration license for cannabis establishment of same type or different type; submission of application by person in response to request for applications.
Chief Gilbert explained that Agenda Items E 1 and 2, NCCR 5.025 and NCCR 5.030 were deleted because they are no longer needed because all licenses are dual licenses.
3. **NCCR 5.037.** Request by the board of county commissioners of a county to the Board to issue a medical cannabis establishment license for one medical cannabis cultivation facility and/or one medical cannabis production facility. Chief Gilbert noted this regulation was updated to reference 5.038, which is a new section.
4. **NCCR 5.038.** Submission of application for a cannabis establishment license other than a cannabis consumption lounge license. Chief Gilbert clarified this is a new section and contains language carried from 5.037 and is amended to allow for any type of cannabis establishment application other than a cannabis consumption lounge. Also, this regulation includes an adult-use establishment application process.
5. **NCCR 5.039.** Criteria and weighting of merit for evaluation of license applications for a medical cannabis establishment license 6. NCCR 5.039.5 Cannabis establishment prospective and conditional licenses. Chief Gilbert said this updates the criteria and weighting of merit, explaining the proposed language provides for an adult use license application process.
He provided summarized subsections 5.039(A), (E), (F), (G), (I), (J), (K), (L)
6. **NCCR 5.039.5** Cannabis establishment prospective and conditional licenses. Continuing, Chief Gilbert explained this is a new section, but it is the same as the prospective license requirements for consumption lounges without social equity requirements. 5.039.5 outlines requirements for submission during the suitability investigation so an applicant can proceed to the conditional phase if found suitable by the board.

Deputy Director Miles clarified the 5.039(1)(A) minimum requirement was raised from \$200,000 to \$250,000 because it was combined medical and adult use licenses, and the medical license required \$250,000. He noted the money does not go to the Cannabis Compliance Board, but is for the licensees to build their businesses, ensuring they have funds put aside prior to receiving a conditional license.

Deputy Director Miles asked for any additional public comments regarding Regulation 5.

Layne Martin, on behalf of the Nevada Cannabis Association, asked about statutory authority for use of a random number generator contemplated in 5.0395 and said it is permitted only for consumption lounges when the government limits the number of available licenses. She said the statute requires merit-based criteria and specific weighting.

Deputy Director Miles stated there is nothing that prevents a random number generator from being used and merit-based suitability is also considered. When the applications result in a tie, the random number generator is used to determine who gets the license.

Amanda Connor of Connor and Connor agreed with Ms. Martin's comments and referred to prior discussions and debate regarding the random number generator for all license types that went to the legislature.

Deputy Director Miles clarified that a bill was submitted but never made it to the legislature, and it was pulled prior to being considered at all.

Ms. Connor summarized her understanding that lounges went to random number generator, and not merit-based criteria, and said there is no need for a random number generator.

Deputy Director Miles restated that merit for the conditional license is considered through points based in the application, and if the points result in a tie, it will then move to the random number generator.

Ms. Martin and Ms. Connor both said the regulation is not clear that the random number generator would be used only in the event of a tie, and Deputy Director Miles said CCB will review the proposed language to determine if it could be made clearer.

Ms. Martin discussed the passage of Senate Bill 41, giving Nevada Department of Taxation oversight on enforcement of taxes. She opined that NCCR 5.100(1)(h) should be removed because it states CCB can deny a license for renewal based on taxes.

Deputy Director Miles responded that once the regulations are implemented, that regulation will be removed and the department of taxation will handle that enforcement.

Deputy Director Miles asked for any additional public comments regarding Regulation 5. There were no additional public comments in person or online.

III. Public Comment

Deputy Director Miles opened Agenda Item III and asked for public comment in Las Vegas. There were no additional public comments in Las Vegas or online.

IV. Adjournment

Workshop adjourned at 10:30 a.m.