

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 15, 2018 10:12:00 AM
Last Modified: Thursday, February 15, 2018 10:15:10 AM
Time Spent: 00:03:10
IP Address: 73.41.183.122

Page 1

Q1 First Name (Optional)

Kelly

Q2 Last Name (Optional)

Chiusano

Q3 Organization (Optional)

Pure Life

Q4 Title (Optional)

CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Thank you for listening to us as stakeholders. In regards to things that a micro business can do, being able to package and label dried flowers to for fill our manufacturing asset of micro business is very helpful to us. Our county will not permit us to cultivate at this time. It would benefit us to be able to cultivate at another site and still be considered a micro business and use shared facilities. thank you again for your time.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 15, 2018 1:09:11 PM
Last Modified: Thursday, February 15, 2018 1:20:28 PM
Time Spent: 00:11:17
IP Address: 73.185.45.102

Page 1

Q1 First Name (Optional)

Courtney

Q2 Last Name (Optional)

Lang

Q3 Organization (Optional)

Taproot Business Consulting, Inc

Q4 Title (Optional)

Principal

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

It would be great to understand whether or not on site consumption will be allowed under the microbusinesses license, the rules for operation and security, as well as when it will be allowed.

What kind of products can be served for on site consumption?

Please consider adding more tiers to the licensing fee structure. A jump from 42K to 120K is huge!

Microbusinesses should be allowed to manufacture and/or sell cannabis flowers and cannabis products from other licensed cultivation sites that they own and operate.

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 15, 2018 4:36:54 PM
Last Modified: Thursday, February 15, 2018 4:51:32 PM
Time Spent: 00:14:37
IP Address: 108.160.36.40

Page 1

Q1 First Name (Optional)

Ronald

Q2 Last Name (Optional)

Hennig

Q3 Organization (Optional)

3R Ranch

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

CALLOUS DISREGARD

The regulations created by this group will only cause more crime. The restrictions, fees, fines, licensing and attitudes made by this agency are intent on controlling a substance that has a history and proven scientific basis as a medicine. However this state, in all its brilliance, will not recognize this. - -> IT CAN'T ! The state has never been known to be compassionate in any way ever ! Its laws are made for those in power with zero concessions made for equity. The state only serves the rich and power-hungry as this seems to have served them in the past. N the state is hypocritical in its law making as is seem in Sec 10 of Prop 64 referring to Sec. 3

SECTION 3. PURPOSE AND INTENT.

The purpose of the Adult Use of Marijuana Act is to establish a comprehensive system to legalize, control and regulate the cultivation, processing, manufacture, distribution, testing, and sale of nonmedical marijuana, including marijuana products, for use by adults 21 years and older, and to tax the commercial growth and retail sale of marijuana. It is the intent of the People in enacting this Act to accomplish the following:

(s) Tax the growth and sale of marijuana in a way that drives out the illicit market for marijuana and discourages use by minors, and abuse by adults.

But this agency pays no attention to its own established rules.

Today the state would like to 'legalize it', as it seems to want commerce in cannabis, with restrictions + a tax. Those who actually need this herb, for medicinal reasons, are still taxed and thus constrained from their health concerns. Others see it as a callous disregard of their 'rights'. Now the state seems to be the only interpreter of 'rights' - what is and isn't. Our governor, a jesuit trained political state leader, deemed an individual, only familiar with alcohol and nicotine, as qualified to run an agency to control this medicinal herb - in the same manner as these two elements. SHE has never ever consumed cannabis and " sees no reason to ". SO - If this agency continues to increase the price of this herb to more than double its former, pre- 2018 price, it will have problems.

It cares not ! It has soldiers, at ready, to 'correct' their

legally created rights and achieve its goals of control and feeding the state's coffers at the expense of those that it supposedly governs.

Is it beyond our government's ability to be Honest, intelligent, compassionate, equitable, And just in its rule making process?

Thank you

Ron Hennig

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 20, 2018 11:38:10 AM
Last Modified: Tuesday, February 20, 2018 11:46:50 AM
Time Spent: 00:08:39
IP Address: 24.5.102.45

Page 1

Q1 First Name (Optional)

Robert

Q2 Last Name (Optional)

May

Q3 Organization (Optional)

Humboldt Sky

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

- 1) allow Microbusiness license holders to operate at least one licensed activity in a different (locally permitted) location.
 - 2) explicitly allow Microbusinesses to hold Type 9 Non-Storefront Retailer licenses
 - 3) explicitly allow Microbusinesses to sell both On-Premises ("Farm Sales-Onsite") and Off-Premises (Direct-To-Consumer Internet, locally compliant "Tasting Rooms", "Farm-Box CSAs, Public Events, etc.)"
 - 4) set significantly lower annual fees for Microbusinesses, both to incent more small rural farmers to get compliant and to offset the significantly higher costs to bring the Microbusinesses' activities into local and state premises requirements.
 - 4) significantly reduce cannabis cultivation tax during the early years of the industry, or, if statute requires tax rates to remain at current levels, then explicitly allocate a portion of collected funds to cultivators to assist them in compliance costs (assuming tax rates of \$148 p.p. for flower and \$44 p.p. for trim, perhaps return 20% of paid-in taxes, either directly in the form of refunds to cultivators or as a credit for state-licensed compliance consulting.
-

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 20, 2018 2:06:11 PM
Last Modified: Tuesday, February 20, 2018 2:24:45 PM
Time Spent: 00:18:34
IP Address: 107.146.239.16

Page 1

Q1 First Name (Optional)

Gary

Q2 Last Name (Optional)

Carr

Q3 Organization (Optional)

GC Profiling

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

There should be a sub-license for Mobile Testing Units (trailer). This would allow growers to submit product to dispensaries with a Certificate of Review. This unit can go to a site to review product that would otherwise be bought without any review for contaminants. I have built a unit that does this. It can test for potencies but more important can review for health risks. Indicator test should be allowed for these unit, such as for heavy metals & pesticides. Exclusions would be for microexams. Any contaminants would be noted on the Certificate for which the dispensary would now know that it is questionable. The comments would indicate a recommendation for further testing by a State Certified laboratory which would have more extensive testing equipment. At a minimum the mobile unit and mine does, would be for Gas Chromatography. These can be purchased for rugged environments. High magnification can be completed. Labelling is completed on each product vessel. Amount is also indicated on the Certificate.

Point is, there has to be an option for the street person. No matter how much legislation, if the opportunity for street testing is not available it will defeat the purpose of protecting the community from contaminated products. They will buy a minimum amount to keep legal and then buy, like they do now, more from the street grower without recording the sales.

It is imperative that mobile testing be part of the legislation due to the availability of the street. ref. www.gcprofiling.com

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 20, 2018 11:01:09 PM
Last Modified: Wednesday, February 21, 2018 12:48:27 AM
Time Spent: 01:47:18
IP Address: 99.162.93.113

Page 1

Q1 First Name (Optional) **Respondent skipped this question**

Q2 Last Name (Optional) **Respondent skipped this question**

Q3 Organization (Optional) **Respondent skipped this question**

Q4 Title (Optional) **Respondent skipped this question**

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Microbusiness Subcommittee**

Q6 Feedback for Subcommittee

The Overview document by BCC says "Retailer cannot package or label cannabis goods." Based on the foregoing, please provide clarification as to the following:

1. Suppose business wants to purchase 5 ounces of dried cannabis flower and then package the cannabis into smaller amounts for sale. For example, divide the larger amount into smaller amounts, such as 1 gram packages, 2 gram packages, etc. What kind of license(s) would be required to conduct that activity?
 2. Can a distributor do it if the sales are only to licensed retailers?
 3. Is the process of dividing the larger amounts into smaller packages considered manufacturing?
 3. Can a microbusiness do it, if approved for manufacturing, distribution, and retail?
-

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 11:02:12 AM
Last Modified: Wednesday, February 21, 2018 11:02:29 AM
Time Spent: 00:00:16
IP Address: 198.189.249.57

Page 1

Q1 First Name (Optional)

Stephani

Q2 Last Name (Optional)

Smith

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

To Whom It May Concern,

With the State's legalization of adult-use cannabis, numerous ancillary industries have arisen in response to new and pending regulations. I've recognized there is a lack of consideration for cannabis waste in particular. This is a concern of mine due to the increasing number of cultivation, manufacturing and retailer licenses being granted within the state without identified guidelines and/or regulations regarding safe disposal of cannabis byproduct and cannabis waste.

Cannabis waste is expansive and differs from cultivators, manufacturers, and retailers. As such, it would also be prudent to clarify streams of waste by industry vertical. For example, cannabis waste runs the gamut of post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items, and more. Currently, certain streams of cannabis waste are frequently mistaken with safe-to-consume products, posing a risk to children and disenfranchised individuals.

It is my recommendation that regulations reflect who is qualified to handle cannabis waste. A licensed cannabis waste handler ought to be contracted for each cannabis cultivator, manufacturer, and retail site to combat the negative repercussions cannabis waste has on human and environmental health. The inclusion of such a standard will complete the symbiotic relationship between key stakeholders—the environment, the public and the industry.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 11:14:01 AM
Last Modified: Wednesday, February 21, 2018 11:14:14 AM
Time Spent: 00:00:12
IP Address: 192.92.176.114

Page 1

Q1 First Name (Optional) **Respondent skipped this question**

Q2 Last Name (Optional) **Respondent skipped this question**

Q3 Organization (Optional) **Respondent skipped this question**

Q4 Title (Optional) **Respondent skipped this question**

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Microbusiness Subcommittee**

Q6 Feedback for Subcommittee

How will waste be managed?

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 12:19:32 PM
Last Modified: Wednesday, February 21, 2018 12:23:53 PM
Time Spent: 00:04:21
IP Address: 96.68.159.125

Page 1

Q1 First Name (Optional)

Tim

Q2 Last Name (Optional)

Blake

Q3 Organization (Optional)

The Emerald Cup

Q4 Title (Optional)

Founder of The Emerald Cup

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

1. Overnight Security at Temporary Events - Section 5402 of the BCC's Emergency Regulations requires that all retail sales conducted at temporary events comply with Section 5403 which provides guidance pertaining to the retail premises 'when not open' to consumers.

Under Section 5403, the retail sale premises must be:

Securely locked with commercial-grade, non-residential door locks;

Equipped with an active alarm system;

And only allow employees and contractors of the retailer to enter the premises when the retailer is not open.

As a temporary event the Emerald Cup currently works with approximately 250 cannabis goods suppliers who conduct their sales out of 10'x10' and 10'x20' temporary vending areas. These vending areas are generally located in either an 'open air' setting secured by a perimeter fence, within a fully enclosed commercial grade tent structure, or within a permanent building. The current requirements associated with overnight security are not realistically applicable to temporary events. Establishing temporary alarm systems poses incredible expense to temporary event license holders and the locked area requirements could also prove to be quite challenging. Additionally, we fear that the requirement for the 'retailer' to provide the contracted security of each retail area would create chaos at temporary events.

Suggested Solutions: The Emerald Cup Team respectfully requests that the BCC establish overnight security requirements that are specific to temporary events. Such requirements should include the following security protocols:

All 'open air' areas where cannabis goods are sold should be securely fenced with lockable ingress and egress gates that must remain locked at all times when sales are NOT being conducted;

If cannabis goods are to be sold at a temporary event within a permanent structure then all windows and doors associated with that structure must remain closed and locked at all times when sales are NOT being conducted;

If cannabis goods are to be sold at a temporary event within a temporary structure, and the temporary structure is constructed with solid walls that extend from the floor or ground to the ceiling of the structure, AND the temporary structure is equipped with locking doors, then the temporary structure must remain locked at all times when sales are NOT being conducted;

In addition to the requirements outlined above, the licensed event organizer must provide contracted security personnel to monitor all areas where cannabis goods will be sold for the entire duration that cannabis goods are on the temporary event premises.

2. Sales at Temporary Cannabis Events - Currently the BCC's Emergency Regulations require that only employees of a licensed retail entity are allowed to conduct the sale of cannabis goods at temporary events. However, the Emerald Cup was established to create a farmer's market type opportunity that allows the consumer to interact with the farmer directly and the farmer to conduct direct to consumer sales. With that said, The Emerald Cup team respectfully requests that independent contractors be allowed to engage in the sale of cannabis goods at compliant temporary events. This request would allow farmers to participate in compliant events, and represent their products in partnership with licensed retail entities. Additionally, we urge the subcommittees to recommend that farmers who obtain a microbusiness license be allowed to conduct sales at compliant events and that these sales serve to fulfill the retail activity of the microbusiness license without also requiring a 'brick and mortar' dispensary or a 'delivery' type dispensary permit from a local jurisdiction. For example, a licensee should be able to qualify for a microbusiness license if he or she cultivates 10,000 SF or less, conducts distribution (or nonvolatile solvent manufacturing) and conducts retail sales at compliant events.

3. Tobacco and Alcohol Sales and Consumption: It is our current interpretation of the temporary event regulations that alcohol and tobacco sales and consumption will be allowed at temporary cannabis events so long as the alcohol and tobacco sales and consumption areas are:

Conducted in a unique and clearly identified area that is separate from all cannabis sales and consumption; AND

Conducted by an entity that is separate from the entity holding the cannabis organizer license.

Currently, most large venues such as County Fairgrounds, reserve the right to conduct the alcohol sales which establishes revenue for the venue and reduces the cost associated with hosting a temporary event. Preserving this ability is a critical component to continuing temporary events at many venues. The Emerald Cup Team respectfully requests that the BCC continue to allow alcohol and tobacco sales and consumption when conducted in the manner outlined above and issue an FAQ clarifying these activities.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 12:24:02 PM
Last Modified: Wednesday, February 21, 2018 1:03:02 PM
Time Spent: 00:38:59
IP Address: 96.68.159.125

Page 1

Q1 First Name (Optional)

Tim

Q2 Last Name (Optional)

Blake

Q3 Organization (Optional)

The Emerald Cup

Q4 Title (Optional)

Founder of The Emerald Cup

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

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#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 1:04:38 PM
Last Modified: Wednesday, February 21, 2018 1:05:32 PM
Time Spent: 00:00:54
IP Address: 96.68.159.125

Page 1

Q1 First Name (Optional)

Hazel

Q2 Last Name (Optional)

Bagwell

Q3 Organization (Optional)

The Emerald Cup

Q4 Title (Optional)

Sponsor Vendor Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

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#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 2:31:08 PM
Last Modified: Wednesday, February 21, 2018 2:42:16 PM
Time Spent: 00:11:08
IP Address: 67.160.198.33

Page 1

Q1 First Name (Optional)

Michelle

Q2 Last Name (Optional)

Dizitser

Q3 Organization (Optional)

Kannibox

Q4 Title (Optional)

Founder and CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

KANNIBOX IS A SOCIALLY RESPONSIBLE COMPANY PROVIDING AN EASY WAY FOR PEOPLE TO DISCOVER DIFFERENT TYPES OF CANNABIS AND TRY PRODUCTS THROUGH A PERSONALIZED SAMPLE SUBSCRIPTION BOX

OUR GOAL AT IS TO HELP SMALL BUSINESS THRIVE BY PROVIDING THEM A PLATFORM AND A CHANNEL TO MARKET. WE WANT TO SEE THE ILLICIT CANNABIS MARKET DISAPPEAR BY GIVING OPPORTUNITIES FOR SMALL BUSINESS TO HAVE A VOICE AND REACH THEIR TARGET CONSUMERS.

WE FEEL THAT SOME OF THE HURDLES THAT HAVE BEEN CREATED BY THE CURRENT REGULATIONS, HAVE HAMPERED THE POTENTIAL SUCCESS OF SMALL BUSINESSES BY NOT GIVING THEM A REASONABLE PATH TO GET TO LEGALIZATION, AND THUSLY HAS POSITIONED THE ILLICIT MARKET TO THRIVE.

KANNIBOX AIMS TO EDUCATE CONSUMERS ABOUT ALL DIFFERENT TYPES OF CONSUMPTION METHODS, DOSING, AND WHAT WORKS BEST FOR THEM AS INDIVIDUALS. HEALTH AND SAFETY IS A NUMBER ONE PRIORITY. IF WE HAVE EDUCATED CONSUMERS WHO UNDERSTAND WHAT THEY ARE CONSUMING, WE WILL HAVE A STRONGER AND MORE COMPASSIONATE MARKET.

WE ARE APPLYING FOR A BOTH MEDICAL AND ADULT USE MICROBUSINESS LICENSES.

I would like to comment to advocate the ability to make sure that microbusinesses can conduct light manufacturing, distribution, and retail activities from one premises.

It is imperative for our business model, that we have the ability to take product from producers and convert that product into either smaller sizes or kannibox branded product as we see patterns emerge in consumer demand.

I would also like to advocate that if a company holds a microbusiness in one location (premises) that it does not prevent us from growing as a business and for example obtaining another license in a different location. The microbusiness should restrict the size that a company can grow in a certain premises and not how large the company can grow as a company.

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 2:32:25 PM
Last Modified: Wednesday, February 21, 2018 2:43:50 PM
Time Spent: 00:11:24
IP Address: 76.21.51.62

Page 1

Q1 First Name (Optional)

Andrea

Q2 Last Name (Optional)

Greenberg

Q3 Organization (Optional)

Society Jane

Q4 Title (Optional)

Co-founder and Chief Counsel

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Hello, my name is Andy Greenberg. I co-own a non-storefront retail delivery business called Society Jane in San Francisco. We primarily focus on products by and for women, and our delivery service is also focused on women. I thank you for all of your hard work in analyzing these regulations, and thank the subcommittee for its focus and patience. I have the following comments as they pertain to my business and the industry in general.

Cultivation:

Eliminate or moderate the Trim Tax.

This substantially increases the expense for suppliers and consumers.

Compassionate Use

Recommendation: Create policy that allows for and encourages donations to compassion programs. Associated tax and administrative provisions should not penalize suppliers who provide free goods to such programs.

Cannabis Advisory Committee: Subcommittee Input Survey for March 1 Meetings

Extend time to conduct business irrespective of M & A designation: CCR § 5029

Cultivators must designate a plant on the A or M track early on. Licensees may 'cross over' between A and M until 6/30/18.

Recommendation: Thank you for including this! It would be helpful if you could extend the time frame in which licensees may conduct business with other licensees irrespective of the M or A designation on their licenses. Please reevaluate whether this policy serves a critical public health and safety function or if another solutions would achieve that aim, with a lower administrative and cost burden to small businesses.

Manufacturing:

Packaging: CCR § 40415

A package used to contain a cannabis product shall adhere to the following requirements:

(b) The package shall be tamper-evident, which means that the product shall be packaged in packaging that is sealed so that the contents cannot be opened without obvious destruction of the seal.

(c) The package shall be child-resistant. A package shall be deemed child-resistant if it satisfies the standard for "special packaging" as set forth in the Poison Prevention Packaging Act of 1970 Regulations (16 C.F.R. §1700.1(b)(4)) (Rev. December 1983), which is hereby incorporated by reference.

(e) If the product is an edible product, the package shall be opaque.

(f) If the package contains more than one serving of cannabis product, the package shall be re-sealable so that child-resistance is maintained throughout the life of the package.

[Issue] Requiring child resistant packaging as stated in the proposed legislation creates significant waste. We urge you to consider the environmental impact from excessive packaging and redundancy.

Requiring child resistant packaging is also expensive. The certification process is time consuming and costly. Sourcing certified child resistant packaging is equally cost prohibitive for small manufacturers.

Washington state does not require child resistant packaging and have not seen safety issues as a result, and the consumer needs to take responsibility for keeping packaging out of hands of children. We believe there should be a balance regarding responsibility consumer and licensee responsibility.

Products for topical application should have more less child-resistant packaging requirements because the danger of ingestion for topicals is low. Topicals should be easy enough to open for those with arthritis. Topicals should not be required to be in child resistant packaging. Instead, should include language "for external use only. Do not eat".

Requiring opaque packaging removes the consumer's ability to interact with a product before purchasing. With proper labeling the consumer is informed of the contents of the product. We would like to see the removal of the requirement that edibles be in opaque packaging.

[Recommendations] We are in full support of tamper-evident packaging. It's proven successful in preventing contaminated products getting into the hands of consumers across other well established industries. We support retailers using opaque child-resistant carry-out bags at the point of sale.

Primary Panel Labeling Requirements: CCR § 40405

[Issue] It's unclear whether primary panel includes the lid for items like beverages. This is one of the most visible part of the product to

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alert consumers the product contains THC, and would give us more flexibility in where we can alert the consumer. For example a beverage should be able to put the universal warning symbol on the primary label OR lid.

[Recommendations] clarify primary panel may also be inclusive of the lid to a product.

Labeling: Different labeling requirements for topicals: BPC § 26120(c)(1)(B)

(B) For cannabis products: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

[Issue] Topical products should have different labeling requirements based on scientific evidence. Requiring a warning on the label of topical products that states that the product will impair the ability to drive etc, assumes that all cannabis topicals are formulated with a permeation enhancer as one would find in a transdermal product. The epidermis and dermis block migration of cannabinoids into the bloodstream. Without an efficacious delivery of cannabinoids into the circulatory or lymphatic systems, topical cannabis products cannot neither impair judgement or reaction timing, nor induce psychoactive effects. Transdermal cannabis products should certainly contain the prescribed warning about impairment as all other edibles.

[Recommendation] For transdermal products, we recommend maintaining the same warning and packaging guidelines as edibles. For all other topical products, we recommend eliminating the language about "intoxicating effects." We further recommend that topicals be exempted from the child-resistant packaging requirements but that they include the disclaimer "For external use only. Do not ingest." This disclaimer would conform to norms in the cosmetics industry.

100 mg limit for packages/10 mg limit for servings: BPC § 26130(c)(2)

(c) Edible cannabis products shall be:

(2) Produced and sold with a standardized concentration of cannabinoids not to exceed 10 milligrams tetrahydrocannabinol (THC) per serving.

[Issue] A 10mg limit per serving a great way to help ensure new patients have a safe experience, and keeps California's regulations in parity with other legalized states. However, a 100mg per package limit is not appropriate for users who may require higher dosage, and patients will slowly learn their own tolerance and be able to set a sensible dose. Much of the cost of goods is burdened by labor, and packaging, so allowing an increased per package limit will help reduce costs of medicine for medical patients, and decrease overall environmental impact.

[Recommendation] Keep a 10mg limit for Adult Use consumers as well as the requirement to delineate or score, but increase the per package limit to 500mg or 1000mg

Single manufacturing license for A & M: CCR § 40115(c) and (d)

(c) A M-license is required in order to manufacture cannabis products for sale in the medicinal-use market.

(d) An A-license is required in order to manufacture cannabis products for sale in the adult-use market.

[Issue] This seems to be a redundant cost for applicants seeking both license types, and one that is cost prohibitive for small businesses. Furthermore, dividing the market into two distinct tracks threatens the medicinal cannabis market. Businesses generally see the adult use market as more promising for growth potential and if forced to choose for economic or administrative reasons, they may choose adult use, leaving patients without sufficient products or retailers. For example a small business would need to maintain to completely separate supply chains from seed to sale losing out on economies of scale, and doubling a manufacturer's up front cost to service both markets.

[Recommendation] Please reevaluate whether there is an administrative need to have two license types for suppliers. If an applicant

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applies for both A&M licenses, is the state agency processing each application separately from start to finish? If not, it is recommended that the state allow a single application for both license types rather than charging to recover costs for two reviews when the process is only completed once.

The A & M designations may be logical at the retail level, but not for suppliers.

Extend time to conduct business irrespective of M & A designation: CCR § 5029

Recommendation: Thank you for including this! It would be helpful if you could extend the time frame in which licensees may conduct business with other licensees irrespective of the M or A designation on their licenses. Businesses need more time to comply with regulations and this extension will allow legislators to pursue statutory change for a single state A&M license.

Shared spaces: CCR § 40190-40199

We are in full support and excited about shared manufacturing spaces! We urge you to define and communicate this legislation quickly as the lack of this legislation negatively impacts our equity partners/incubators and small manufacturers. Licensing fees have become a barrier to entry for small businesses and equity incubators. By allowing shared spaces, small businesses can afford to obtain zoning-compliant spaces and enter the regulated market.

Recommendation: We request you to consider allowing shared equipment for non extraction related equipment. With the proper GMP's and SOP's in place there should be little to no risk of cross contamination. This is similar for mobile bottlers in the alcohol industry or co-packers in the traditional food industry.

We urge you to avoid any language defining or capping square footage, number of employees or businesses per premise. There are significant safety measures put in place by the Fire Department as well as the Department of Public Health to address any concerns regarding limitations to shared food processing and building safety.

Finally, please allow licensees in shared spaces to have shared storage. This will help small businesses to afford the costs of compliance. Shared locked cages for product are economically practical and guidelines may be specified to ensure each licensee's products remain separate within the cage.

Promotional Samples: BPC § 26153, CCR § 5411(a) and (b), RTC § 34011(a)(1) and (e)

A licensee shall not give away any amount of cannabis or cannabis products, or any cannabis accessories, as part of a business promotion or other commercial activity

--

(a) A licensed dispensary shall not provide free samples of medical cannabis goods to any person.

[Issue] Sampling is the most effective way for patients to discover the treatment methods that work best for them through firsthand experience. Medical cannabis products can be high-priced, and patients may be reluctant to spend money to find the best method of intake for them. However samples can be both properly tested, and distributed through the track and trace system to safely allow patients to experience new products. Cannabis has been deemed by the state to be safe for recreational use by adults, and dispensaries can only admit consenting adults it's reasonable to assume sampling on-site can be done safely.

[Recommendation] We propose samples be allowed for the purpose of patient education, and that they be distributed through licensed distributors using the same testing requirements as retail product. The chain of custody is preserved under the proposed safety compliance channels, ensuring sampling is a safe and effective way to educate.

(b) A licensed dispensary shall not allow representatives of other companies or organizations to provide free samples of medical cannabis goods to individuals on the licensed dispensary premises.

We need to be able to offer sales samples to dispensary buyers. In order to grow our business effectively we need to be able to open up new accounts. The only way a dispensary will consider adding products to their menu is when they are able to sample the retail unit that they would purchase for patients and consumers.

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Recommendation: We would like to see concessions that allow sales samples to be given away to prospective buyers as a B2B function. All retain units will go through the track and trace system, but a sensible allowance of 4% of product may be allocated for sales samples strictly for the purpose of B2B account establishment. We also recommend that for the purpose of B2B non-commercial sales prospecting, samples should be allowed to be delivered by type II distributors, as these products will not be for sale.

(a) (1) Effective January 1, 2018, a cannabis excise tax shall be imposed upon purchasers of cannabis or cannabis products sold in this state at the rate of 15 percent of the average market price of any retail sale by a cannabis retailer. A purchaser's liability for the cannabis excise tax is not extinguished until the cannabis excise tax has been paid to this state except that an invoice, receipt, or other document from a cannabis retailer given to the purchaser pursuant to this subdivision is sufficient to relieve the purchaser from further liability for the tax to which the invoice, receipt, or other document refers.

(e) Cannabis or cannabis products shall not be sold to a purchaser unless the excise tax required by law has been paid by the purchaser at the time of sale.

Sales and promotional samples should be exempt from excise tax, and these are B2B tools for business development, and not for commercial use. It's unreasonable to burden a sales sample with the full tax of a sellable product, and this will lead to more delays to getting product into the market which will ultimately drive more tax revenue for CA, and allow manufacturers to more quickly compete in the market.

Recommendation: Above, we have outlined ways that we think manufacturers and distributors should be allowed to provide B2B samples, as well as consumer samples. We recommend that samples either be non-taxable items to match other industries, or, that they be taxed on the sample rate they were sold at instead of based on the standard markup

5411. Free Cannabis Goods

(a) A retailer shall not provide free cannabis goods to any person.

Despite the fact that cannabis has been legally available to qualified medical patients in California since 1996, there exists a huge knowledge gap among cannabis consumers, particularly new or returning adult-use consumers.

A retailer's ability to offer free samples will go a long way in closing that knowledge gap, helping to educate consumers regarding efficacy, dosage, consumption methods, strength, quality, taste, smell and personal preference. Cannabis is not a one-size-fits-all product. Every body processes cannabis differently, and sampling will enable consumers to evaluate products based their specific and unique reactions prior to purchase.

In addition, allowing manufacturers to offer samples to retailers will serve to educate retail staff who are often the first (and sometimes only) source of information for consumers.

The ability to give out free samples is especially important when considering cannabis compassion programs and the fact that the industry has a demonstrated commitment to helping those in need.

Recommendation: Adopt policy similar to the pharmaceutical industry where manufacturers are allowed to offer free samples to physicians who may then pass on the products to their patients. Mark sample products clearly as "not for sale" and limit the quantity/size of sample to a single serving/dose.

Reporting ownership changes to DPH: CCR § 40178

The licensee shall notify the Department of the addition or removal of an owner occurring any time between issuance of a license and submission of an application to renew the license within 10 calendar days of the change. The new owner shall submit the information required under Section 40130 to the Department. The Department shall review the qualifications of the owner in accordance with the Act

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and these regulations and determine whether the change would constitute grounds for denial of the license. The Department may approve the addition of the owner, deny the addition of the owner, or condition the license as appropriate, to be determined on a case-by-case basis.

Recommendation: Allow licensees 30 calendar days to notify the state.

Local taxation, and fair market burdens

The legalization of cannabis was meant to provide customers and patients with safe access to cannabis as well as provide the state with additional revenue. However many local jurisdictions have also imposed gross receipts tax on cannabis businesses that far outweighs the taxation on any other industry. Combined with state excise tax, and the complexity of the supply chain, this results in lower margins, and can make small businesses non-competitive with the larger market solely based on where they operate.

Recommendation: In order to give the entire industry a level playing field no matter where they operate, and to control the overall tax burden of a new industry, we propose capping county and municipal level local gross receipts taxes on manufacturers at 2%. Please also clarify tax collection as it relates to manufacturers.

Security Systems: CCR § 5044

Security systems are another barrier to entry for small businesses but there are a wide range of affordable systems which are extremely modern and up to date for those affordable cloud based services offer a maximum of 60 days of footage and record 5 minutes clips based on motion rather than 24-hour continuous recording. 24 hour continuous recording is more than any other industry and requires costly custom installations with large external storage systems. We love the idea of a cloud based system and it makes sense to set the regulations to match the standard met by the best modern security systems.

Recommendation: allow operators to capture 60 days of footage instead of 90, and allow footage to be captured when motion is detected rather than 24/7.

Delivery/Retail:

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Recommendation: We propose samples be allowed for the purpose of patient education, and that they be distributed through licensed distributors using the same testing requirements as retail product. The chain of custody is preserved under the proposed safety compliance channels, ensuring sampling is a safe and effective way to educate.

(b) A licensed dispensary shall not allow representatives of other companies or organizations to provide free samples of medical cannabis goods to individuals on the licensed dispensary premises.

Suppliers need to be able to offer sales samples to dispensary buyers. The only way a dispensary will consider adding products to their menu is when they are able to sample the retail unit that they would purchase for patients and consumers.

Recommendation: We would like to see concessions that allow sales samples to be given away to prospective buyers as a B2B function. All retail units will go through the track and trace system, but a sensible allowance of 4% of product may be allocated for sales samples strictly for the purpose of B2B account establishment. We also recommend that for the purpose of B2B non-commercial sales prospecting, samples should be allowed to be delivered by type II distributors, as these products will not be for sale.

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(e) Cannabis or cannabis products shall not be sold to a purchaser unless the excise tax required by law has been paid by the purchaser at the time of sale.

Sales and promotional samples should be exempt from excise tax, and these are B2B tools for business development, and not for commercial use. It's unreasonable to burden a sales sample with the full tax of a sellable product, and this will lead to more delays to getting product into the market which will ultimately drive more tax revenue for CA. It also helps ensure that small suppliers can compete, facilitating the diversity of products offered to consumers.

Recommendation: We recommend that samples either be non-taxable items to match other industries, or, that they be taxed on the sample rate they were sold at instead of based on the standard markup.

5417. Methods of Delivery

(a) A retailer's delivery employee, carrying cannabis goods for delivery, shall only travel in an enclosed motor vehicle operated by a delivery employee of the licensee.

The last thing a busy municipality needs is more cars on their streets. Allowing deliveries to be conducted by delivery employees via scooter, motorcycle, bicycle or even on foot would help alleviate congested roadways, ensure faster, safer deliveries and cut down on

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scooter, motorcycle, bicycle or even on foot would help alleviate congested roadways, ensure faster, safer deliveries and cut down on harmful emissions to the environment.

Cannabis storage in an enclosed and secured compartment is still possible in an unenclosed vehicle.

In addition, prohibiting delivery vehicles from carrying no more than \$3,000 worth of inventory is counterproductive to public safety. This cap, which forces delivery drivers to make more frequent trips to and from the retailer, increases the likelihood that the driver will be a target of theft and other dangers. This is also less environmentally sound.

Recommendation: Method of delivery may be more appropriately regulated at the local level, given different population density and geography.

Remove the cap on inventory to allow a dynamic delivery model.

Do not require printed manifest for delivery.

Drivers should be able to get TNC (Transportation Network Company) numbers to share insurance and use the driver's personal vehicles. Lyft and Uber use this model successfully.

5420. Delivery Request Receipt

A retailer shall prepare a delivery request receipt for each delivery of cannabis goods.

(a) The delivery request receipt shall contain the following:

(1) The name and address of the retailer

Type 9-Non-Storefront Retailers are prohibited from allowing public access to their premises. Requiring that the delivery request receipt include the address of the non-storefront retailer presents unnecessary and unsafe exposure for the non-storefront retailer. Not only does calling out the address invite criminal entities to the premises, it also signals to the consumer that their presence is allowed and encouraged. I have a woman-owned small business, and am frequently the only person in the office after dark. If my business address is to be public, I fear for my personal safety and for the security of my property. This issue is really important to me, as I would constantly be nervous about entering, exiting and being inside my business.

Recommendation: Use the retailer's license number rather than address on the receipt. Tracking is still possible, but this method reduces security risks.

Related: Address of Type 9-Non-Storefront Retailers should not be listed on the BCC website for the same reasons listed above.

Expand allowable event locations: BPC § 26200(e)

(e) This division does not prohibit the issuance of a state temporary event license to a licensee authorizing onsite cannabis sales to, and consumption by, persons 21 years of age or older at a county fair or district agricultural association event, provided that the activities, at a minimum, comply with the requirements of paragraphs (1) to (3), inclusive, of subdivision (g), that all participants are licensed under this division, and that the activities are otherwise consistent with regulations promulgated and adopted by the bureau governing state temporary event licenses. These temporary event licenses shall only be issued in local jurisdictions that authorize such events.

Offer the ability to host an event with the option to purchase single use permits or a repeating event permit. Allowable locations should be broadened beyond county fairs and district agricultural associations. Event licensing should not eliminate existing (pre-MAUCRSA) small businesses, many of which have served patients for years and are an important part of the community.

Regulators are concerned about educating new consumers. Dinner parties, yoga classes, and small gatherings provide safe and legal consumption experiences. They are excellent opportunities for direct education, perhaps more impactful than a flyer or pamphlet because they are interesting and interactive. Tourists will be able to select a supervised/guided experience rather than purchasing and

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because they are interesting and interactive. Tourists will be able to select a supervised/guided experience, rather than purchasing and consuming on the street (and receiving a citation) or in a hotel room alone.

Such events also contribute to the normalization of cannabis. There is a substantial therapeutic benefit in combining cannabis with wellness activities.

In terms of criminal justice, the scarcity of consumption locations and opportunities for consumers to enjoy cannabis creates a new form of criminalization. Existing consumption opportunities are incredibly limited and cannot accommodate demand. The law encourages consumers to consume in violation of the law, by having legal ways to purchase without sufficient legal ways to consume.

This is an equity issue, as consumption in public housing is not allowed. Those consumers will have limited legal options to consume compared to a person of greater means who owns their property and cannot be restricted from consuming in their home.

Distribution:

Taxation

The existing tax structure pushes small and medium sized businesses out.

Recommendation: Shift cultivation tax to one percentage-based number at the point of sale.

Shift excise tax liability to retailer, rather than having retailer pay distributor in advance before collecting the tax from the consumer. Create greater efficiency and clarity in the tax. Makes it more transparent for consumers, who should understand the taxes they are paying.

Medical patients shouldn't have to pay the excise tax, which is essentially a 'sin tax.' Requiring this is like charging an excise tax on prescription medications.

Commercial vehicle ownership

Recommendation: Allow employees to incorporate and own their vehicles. This is more cost-effective. Follow the TNC model (Lyft/Uber).

Relabeling by distributors: CCR § 5303

A manufacturer places test results on label. Distributors can't relabel after test results, even if testing shows different values; they can relabel THC but not CBD, terpenes. There is also a related issue of different testing results from labs using different methodologies that should be corrected through standardization.

Suppliers need to be able to tell the distributors which labs have protocols that are effective for the product type. Please clarify acceptable variance and whether products need to be relabeled if test results are within that margin.

Recommendation: Allow distributors to relabel for CBD and terpenes; standardize testing methodologies or allow suppliers to specify labs that utilize compatible methodologies; allow a 20% margin for different testing labs' results.

Equity:

Shared spaces: CCR § 40190-40199

We are in full support and excited about shared manufacturing spaces! We urge you to define and communicate this legislation quickly as the lack of this legislation negatively impacts our equity partners/incubators and small manufacturers. Licensing fees have become a barrier to entry for small businesses and equity incubators. By allowing shared spaces, small businesses can afford to obtain zoning-compliant spaces and enter the regulated market.

Recommendation: We request you to consider allowing shared equipment for non extraction related equipment. With the proper GMP's and SOP's in place there should be little to no risk of cross contamination. This is similar for mobile bottlers in the alcohol industry or co-packers in the traditional food industry.

We urge you to avoid any language defining or capping square footage, number of employees or businesses per premise. There are significant safety measures put in place by the Fire Department as well as the Department of Public Health to address any concerns regarding limitations to shared food processing and building safety.

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Finally, please allow licensees in shared spaces to have shared storage. This will help small businesses to afford the costs of compliance. Shared locked cages for product are economically practical and guidelines may be specified to ensure each licensee's products remain separate within the cage.

Extend time to conduct business irrespective of M & A designation: CCR § 5029

Licensees may 'cross over' between A and M until 6/30/18. The requirement of 2 separate licenses, when cannabis and products are subject to nearly identical quality control and public health requirements, creates an equity issue.

Recommendation: Thank you for including the 6 month transition period! It would be helpful if you could extend the time frame in which licensees may conduct business with other licensees irrespective of the M or A designation on their licenses. Please reevaluate whether this policy serves a critical public health and safety function or if another solutions would achieve that aim, with a lower administrative and cost burden to small businesses, which is especially acute for equity businesses.

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 12:29:02 PM
Last Modified: Wednesday, February 21, 2018 3:04:24 PM
Time Spent: 02:35:22
IP Address: 73.93.140.216

Page 1

Q1 First Name (Optional)

Nina

Q2 Last Name (Optional)

Parks

Q3 Organization (Optional)

Mirage Medicinal/ Supernova Women

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Hello Committee Members:

Thank you for your work in helping the community synthesize our feedback into coherent recommendations for the state, I'm sure this process is very overwhelming as it is for us as business owners and operators and as consumers.

I am writing on behalf of a coalition of small businesses and equity businesses in San Francisco.

We are in full support and excited about shared manufacturing spaces! We urge you to define and communicate this legislation quickly as the lack of this legislation negatively impacts our equity partners/incubators and small manufacturers. Licensing fees have become a barrier to entry for small businesses and equity incubators. By allowing shared spaces, small businesses can afford to obtain zoning-compliant spaces and enter the regulated market.

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#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 3:54:15 PM
Last Modified: Wednesday, February 21, 2018 4:56:15 PM
Time Spent: 01:02:00
IP Address: 107.77.214.199

Page 1

Q1 First Name (Optional)

Ryan

Q2 Last Name (Optional)

Miller

Q3 Organization (Optional)

Operation EVAC/Compassion Coalition

Q4 Title (Optional)

Co-founder

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Thank you for seeking community input toward the creation of a fantastic cannabis marketplace in our shared home of California.

The emergency regulations released in the Fall demonstrate that The State is listening to feedback and adjusting accordingly. The policy which allows for the compassionate exchange of philanthropic goods for medical cannabis patients is particularly encouraging. We still have work to do to ensure that the most vulnerable communities aren't left behind with Prop 64 and that the culture of compassion in California cannabis is restored.

Below are our initial policy recommendations.

Issue temporary emergency licenses for compassion programs pending the (postponed) nonprofit feasibility study deadline of January, 2020

Expand track and trace to include philanthropic exchanges of cannabis goods.

Incentivize philanthropy with tax credits instead of discouraging philanthropy with tax liabilities of "full-market value."

If bicycle delivery is unrealistic then offer no-interest loans to compassion programs to transition to secure vehicle transportation.

Expand equity to include compassion programs.

Expand equity to include military veterans.

Incentivize dispensaries to incubate compassion programs for shared secure storage, tracking, processing, and dispensing.

This would be a great start to creating a pathway to compliance for life-sustaining organizations serving the most vulnerable communities.

In service,
Ryan Miller

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 21, 2018 5:01:33 PM
Last Modified: Wednesday, February 21, 2018 5:09:37 PM
Time Spent: 00:08:04
IP Address: 107.77.214.55

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

WFWP Oakland

Q4 Title (Optional)

Chapter President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Hello my name is Brian Schwyzer and I run the Oakland California chapter of the Weed for Warriors Project. We are a not for profit organization that help veterans heal through cannabis, fellowship and community projects. We hold monthly accountability meeting I which we provide food, personal care services like haircuts, massages, cannabis education, and we provide our veterans with free cannabis products. We distribute roughly a pound and a half of flowers, half pound of concentrates, 200 edibles, 1800 capsules and a ton of topical as and other cannabis products. With the current regulations under prop 64 we are now unable to provide our veterans with the medicine they desperately need. To fix his we have been working with the Oakland cannabis commission and these are the proposals we asked for and that were passed by them last week.

Here are the specific topics we would like to see addressed by the BCC:

-0% tax on donated medicine along the entire supply chain.

-tax credits for businesses and individuals donating money and cannabis to compassion programs.

-a new permit category for compassion programs. This permit should be for both stand alone programs as well as programs partnering with a dispensary. We believe compassion programs should have flexibility in determining how they will operate. Some will want their own facility while others will want to operate in a dispensary's permitted facility.
