



Office of Cannabis Management

KATHY HOCHUL

Governor

TREMAINE WRIGHT

Cannabis Control Board Chair

JESSICA GARCIA

Board Member

HOPE KNIGHT

Board Member

ADAM W. PERRY

Board Member

JENNIFER GILBERT JENKINS

Board Member

CHRIS ALEXANDER

Executive Director

Meeting Minutes

Title:	New York State Cannabis Control Board Meeting
Time & Date:	July 19, 2023 at 10:30AM
Location:	City University of New York Graduate School of Public Health & Health Policy (CUNY SPH), 55 West 125th Street, SPH-708 Auditorium, New York, NY 10027 and Virtual via Webcast

Attendance

Board Chair:	Tremaine Wright
Board Members Present:	Jennifer Gilbert Jenkins, Hope Knight
Board Members Present (virtually from a private location due to extraordinary circumstances):	Jessica Garcia, Adam W. Perry
Board Members Absent:	N/A
Others Present:	Chris Alexander, John Kagia, Patrick McKeage
Others Present Virtually:	Patricia Heer, Nicole Quackenbush, Nakesha Abel

Agenda

- I. Call to Order
- II. Welcome and Opening Remarks
- III. Approval of Meeting Minutes from June 15, 2023 Board Meeting
- IV. Consideration of Conditional Adult-Use Retail Dispensary Licenses
- V. Consideration of Cannabis Growers Showcase Initiative
- VI. Consideration of Cannabis Laboratory Testing Permit
- VII. Consideration of Medical Cannabis Proposed Regulations
- VIII. Consideration of Cannabis Research Regulations
- IX. Consideration of Cannabinoid Hemp Emergency Regulations
- X. Consideration of Violation, Hearings and Enforcement Emergency Revised Regulations
- XI. Consideration of Board Member Disclosure Resolution
- XII. Executive Director Report
- XIII. Public Comment
- XIV. Adjourn



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Action Items

Resolution No. 2023-24:	Resolution Issuing Certain Conditional Adult-Use Retail Dispensary Licenses.	Passed, Unanimous Vote
Resolution No. 2023-25:	Resolution Authorizing Temporary Retail for Conditional Adult-Use Retail Dispensary Licensees Showcasing Adult-Use Conditional Cultivator Licensees and Adult-Use Conditional Processor Licensees and Their Cannabis Products at a Location and on Terms Approved by the Office of Cannabis Management.	Passed, Unanimous Vote
Resolution No. 2023-26:	Resolution Issuing Certain Cannabis Laboratory Permit.	Passed, Unanimous Vote
Resolution No. 2023-27:	Resolution Directing the Office of Cannabis Management to File Certain Medical Cannabis Regulation Amendments.	Passed, Unanimous Vote
Resolution No. 2023-28:	Resolution Directing the Office of Cannabis Management to Adopt the Proposed Cannabis Research Regulations.	Passed, Unanimous Vote
Resolution No. 2023-29:	Resolution Directing the Office of Cannabis Management to File a Notice of Emergency Adoption and Proposed Rulemaking Concerning Amendments to Cannabinoid Hemp Regulations.	Passed, Unanimous Vote
Resolution No. 2023-30:	Resolution Directing the Office of Cannabis Management to File for Emergency Adoption and Revised Proposed Rulemaking of Certain Violations, Hearings, and Enforcement Regulations.	Passed, Unanimous Vote
Resolution No. 2023-31:	Resolution Permitting Hope Knight to Hold Public Office and Serve as a Member of the Cannabis Control Board.	Passed, Unanimous Vote

Notes & Comments

- Chair Wright welcomed the newest member of the Cannabis Control Board (CCB), Hope Knight, who was appointed by Governor Hochul last month. Today is Hope Knight’s first meeting as a member of the CCB. Hope Knight is currently the President, CEO and Commissioner of Empire State Development.
- Board Member Hope Knight introduced herself and commented that she has been in economic development for the last two decades, working in communities like this and Southeastern Queens, and when she was at the Upper Manhattan Empowerment Zone, her office was in this office, and that she looks forward to working with the Board and staff on this very important initiative.



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- Upon a motion from Board Member Jennifer Gilbert Jenkins, and a second from Board Member Hope Knight, the Minutes of the June 15, 2023 Cannabis Control Board Meeting were approved unanimously.
- Chris Alexander, Executive Director for the Office of Cannabis Management (OCM), provided an overview of Resolution No. 2023-24, a Resolution Issuing Certain Conditional Adult-Use Retail Dispensary Licenses. OCM completed the review of and recommended an additional 212 Conditional Adult-Use Retail Dispensary (CAURD) licenses to the CCB. These additional licenses represent a significant expansion of the CAURD program to a total of 463 licenses across New York State. This expansion is necessary to help prepare New York's market for the next phase of adult-use cannabis. The decision to further expand the CAURD program will help ensure the retail market is robust enough to sell the cannabis grown by New York farmers and accelerate the transition of New York consumers from the illicit to the legal market. The individuals and entities receiving provisional licensure can now begin the work of identifying and securing a retail dispensary location and submitting the location to the Office for review and approval. OCM is also pleased to announce the launch of the DASNY Search Tool which will allow CAURD licensees to receive a preliminary proximity assessment of a potential retail dispensary location. An invitation for this database will be sent to all new and already approved CAURD licensees. Due to the quantity of applications that were received that included Manhattan as their first priority region, OCM was not able to grant everyone Manhattan approval to be able to stay in proportion with the original allocation of CAURD licensees, which was based on population. The Office will notify individuals of the region in which they are provisionally licensed.
- Board Member Jennifer Gilbert Jenkins commented that she would like to see more of Central New York represented and also a representation of towns that have allowed for applications in Central New York, but there is quite a disparity in that region and, therefore, the abundance of illegal shops in that area will remain.
- Executive Director Chris Alexander commented that the lack of licensees is really based on the individuals who applied in that region.
- Chair Wright asked for the total number of people who are currently being presented for locations in Manhattan.
- Executive Director Chris Alexander responded that he does not have the exact count of who is being presented for a final location in Manhattan but think there are 82 licensees that are being presented for provisional approval that had Manhattan as their first preference, but that is not where they will land in terms of where they will actually be approved to operate.
- Chair Wright asked does a licensee have a say.
- Executive Director Chris Alexander responded that they had a say in ranking their order of preference and that a significant portion of applications indicated Manhattan as their first preference, so much more so than any other region that if they were to overflow Manhattan, they would have issues moving forward licensing other people in the Borough of Manhattan.
- Board Member Jennifer Garcia asked for clarification on the type of assistance that will be available to this batch of CAURD applicants and will they be able to access the fund and be able to work with DASNY on a location.



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- Executive Director Chris Alexander responded that the first group of applicants, the first 150 scoring CAURD licensees, were the ones who are eligible for Fund support and that there is no guarantee beyond that first 150.
- Upon a motion from Board Member Jennifer Gilbert Jenkins, and a second from Board Member Jessica Garcia, Resolution No. 2023-24, a Resolution Issuing Certain Conditional Adult-Use Retail Dispensary Licenses, was approved unanimously.
- John Kagia, Director of Policy for OCM, provided an overview on the Cannabis Growers Showcase (CGS) Initiative, a new program intended to expand retail access and stimulate sales of legal cannabis across the State of New York. CGSs will enable conditional cultivators and processors to showcase the cannabis products that they have grown and manufactured in New York and allow retailers to sell cannabis to consumers at non-storefront locations across the State. CGSs will occur at licensed locations as well as at approved events by the Office. CGS applications must be submitted to the Office by a CGS Organizer, who may be a CAURD licensee or an Adult-Use Conditional Cultivator (AUCC) licensee. The CGSs will need municipal approval in order for them to proceed. Before the application is submitted to the Office, CGS organizers will need to ensure that the municipality by the CGS is being organized, has approved the specific event.
- Additionally, CGSs cannot be held in jurisdictions which have opted out of retail cannabis sales.
- All CGSs must receive explicit approval from the Office.
- Requirements to organize a Cannabis Growers Showcase:
 - Three (3) or more cultivators work with a CGS Vendor (a licensed CAURD) to showcase and sell their products at approved Cannabis Grower Showcases organized at licensed locations and approved trade shows, events, festivals, and concerts.
 - A minimum of three (3) Conditional Cultivators growers per CGS.
 - No more than one (1) Conditional Processor per three (3) growers.
 - Conditional Cultivators can distribute flower products only (loose flower and pre-rolls).
 - Conditional Processors can only distribute value-added products (no loose flower and pre-rolls).
 - No cap on number of retailers but minimum of three (3) Conditional Cultivators per retailer.
 - All products sold must have passed testing conducted by a New York State permitted laboratory and be in regulatorily compliant packaging with compliant labeling.
- Board Member Jennifer Gilbert Jenkins commented that she wanted to make sure that the name Cannabis Growers Showcase is true to what they are doing and that this is about growers and that this opportunity to add value added products in there is a slippery slope and that these are not just pop-up dispensaries where the variety of products that are available is what you are seeing there because they want to directly help the growers as much as possible. She further commented that they need to make sure that they have as much going to the farmers as possible so that the backlog of biomass that has not been sold can actually



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make it to the public and that at this specific event, a Cannabis Grower Showcase, is going there for flower and not for all of this other value added products. She stated that she thinks that they need to be more focused on the name of the event.

- Executive Director Chris Alexander commented that he thinks that was a pretty clear direction on what this needs to look like moving forward for the Office as they approve these events. He stated that he thinks New York's cannabis community, the folks who are aware of the challenges that farmers have had, the retailers who are going to offer themselves up to support these endeavors, that they all share that concern and want to be helpful.
- Board Member Jennifer Gilbert Jenkins commented that before she is willing to approve, she wants to make sure that it is going to be required and wants to see it in writing.
- Chair Wright asked if there is a provision in the proposal that is before them that could be edited to address the concern that has just been brought up.
- Executive Director Chris Alexander commented that there is no provision in the resolution in front of the Board to address the concern that has been brought up and that they can have a discussion.
- Chair Wright commented that they can definitely adjust the resolution to put parameters in to effectuate the concern, but need a draft of the resolution so that they know where it is going.
- Chair Wright asked for a motion to table this until they get a copy of the resolution and to return to it later in the meeting. Board Member Jennifer Gilbert Jenkins moved the motion, and Chair Wright seconded.
- Executive Director commented that he wanted to inform the Board that changing a parameter or a piece of the broader puzzle without completed guidance is not really clear to the public in terms of the direction that they are going, and if there is an intention to make clear the priorities of the program, they should just make that intention clear and then work to meet that intention.
- Chair Wright commented that they will try to put some specific language, since the proposal is to table it, and when they come back to it, the Board will be able to evaluate the amended language and move forward with that.

- Chair Wright provided an overview of Resolution No. 2023-26, a Resolution Issuing Certain Cannabis Laboratory Permit. This resolution seeks to approve the inclusion of an additional cannabis laboratory testing permit for Coral Reef Labs in Johnson City, NY. With this approval, Coral Reef Labs will become the 15th permitted cannabis testing laboratory in New York State. Ensuring sufficient lab testing capacity remains a priority for the Board as the State's cannabis industry continues to grow and consumer demand increases.
- Upon a motion from Board Member Jennifer Gilbert Jenkins, and a second from Board Member Hope Knight, Resolution No. 2023-26, a Resolution Issuing Certain Cannabis Laboratory Permit, was approved unanimously.

- Nicole Quackenbush, the Director of Health and Safety for OCM, provided an overview of Resolution No. 2023-27, a Resolution Directing the Office of Cannabis Management to File Certain Medical Cannabis Regulation Amendments. Part 113 Medical Cannabis Regulations went into effect on February 22nd. After the Medical Cannabis Regulations went into effect, Packaging, Labeling, Marketing and Advertising Regulations became effective in March and



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revised regulations were introduced for Adult-Use on June 14th. The Office conducted an analysis of the different requirements in each of the regulatory packages to identify opportunities for alignment. A few key changes include:

- The amended regulations include conformance with adult-use packaging and labeling requirements with a few exceptions. One of those exceptions is that medical cannabis products will continue to be labeled with a “dose” rather than a “serving” since they are for medical use.
 - Certain definitions and requirements for Worker Health and Safety Standards and TPI disclosure have been amended to conform to the Adult-Use Regulations.
 - Laboratory testing requirements were updated to require terpene content to be reported, where previously terpenes were only reported if marketed. Beyond their aroma, terpenes may play a therapeutic role and disclosing this information is important to many medical cannabis patients.
- Amendments will be published in the State Register for a 60-day public comment period.
 - Upon a motion from Board Member Jennifer Gilbert Jenkins, and a second from Board Member Hope Knight, Resolution No. 2023-27, a Resolution Directing the Office of Cannabis Management to File Certain Medical Cannabis Regulation Amendments, was approved unanimously.

- Nicole Quackenbush, the Director of Health and Safety for OCM, provided an overview on the proposed Cannabis Research Regulations.
 - The public comment period concluded on June 12, 2023.
 - These regulations provide a framework for cannabis research licensees to produce, process, purchase, and/or possess cannabis for limited research purposes in New York State.
 - OCM received 22 public comments. Most comments were supportive of the Office’s efforts to strengthen cannabis research in New York State. Some commenters expressed concerns about administrative and reporting requirements.
 - No comments were made that necessitated changes to the proposed regulations.
- Board Member Jennifer Gilbert Jenkins commented that in January, she had worked with putting some of these together, and that she is really excited to see this move forward and that she knows a lot of the community is focused on the medical side of research, but wearing her other hat, the agricultural side of research here, there are some wonderful opportunities for the State and some really important information that they need to be able to look into. She further commented that as they see this rollout and look to the implementation of research, that they can maybe come back to some of those reporting requirements and see what is actually necessary and what is redundant because she had some similar concerns.
- Chair Wright commented that she thinks this is the space in which New York could really grow the cannabis industry tremendously and have a benefit that will really help what R&D looks like for the adult-use program and medical program. She commented that one of the things that was very important to her was the reporting out of results, while they have agreed that it will not be a mandated quarterly report, it was requested and agreed upon that they would have updates quarterly to the Board on what is happening in the research space, because she thinks it's going to become really important that it never gets lost and that it



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stays in the forefront of the conversation as they develop this industry and that New York has a lot of potential to capture information, to try new things, and that she is really excited to see what might come out of the research space as a result of this.

- Upon a motion from Board Member Hope Knight, and a second from Board Member Jennifer Gilbert Jenkins, Resolution No. 2023-28, a Resolution Directing the Office of Cannabis Management to Adopt the Proposed Cannabis Research Regulations, was approved unanimously.
- Patrick McKeage, First Deputy Director for OCM, provided an overview of Resolution No. 2023-29, a Resolution Directing the Office of Cannabis Management to File a Notice of Emergency Adoption and Proposed Rulemaking Concerning Amendments to Cannabinoid Hemp Regulations. Adoption of these regulations will protect public health, safety, and the welfare of consumers from the immediate threat posed by intoxicating cannabinoid hemp products sold in New York State. Notable changes include:
 - Establishing a minimum allowable CBD: THC ration (15:1) and places limits on the total THC allowed in certain cannabinoid hemp products, if CBD is not the primary marketed cannabinoid, the sum of the cannabinoids excluding THC must meet this ration of 15:1 THC.
 - Revising cannabinoid hemp retailer prohibitions to prohibit the sale of cannabinoid hemp products containing over 0.5 mg of total THC per serving to individuals under the age of twenty-one.
 - Revising current laboratory testing requirements for cannabinoid hemp products to conform with testing limits in the adult-use and medical cannabis programs.
 - Revising packaging, labeling, marketing, and advertising rules to prohibit cannabinoid hemp products from being attractive to individuals under the age of 21, displaying false statements or touting health claims, and promoting overconsumption.
- Board Member Jennifer Gilbert Jenkins commented that they have that little caveat in the language there to say if there is more needed that she hopes that they are open to looking at that on the short term because she is concerned about whether they have closed or shrunk the loophole, but thinks it is still there and wants to make sure that they can fully close that loophole. She stated that as it is right now, they should pass it and then come back to that space where they have the ability to write more.
- Chair Wright asked to identify what the allowable CBD to THC ratio is for products.
- Patrick McKeage commented that the CBD to THC ratio, what they have borrowed from a number of other states who have taken a similar approach to try and close this loophole, is 15 to 1 CBD to THC. He further commented that they have also implemented an allowable 10 milligrams of THC per package and 1 milligram THC per serving for food and beverage products.
- Chair Wright asked are all forms of CBD allowed in New York State.
- Patrick McKeage commented that all forms of CBD are, but not all cannabinoids derived from hemp are.
- Upon a motion from Board Member Hope Knight, and a second from Board Member Jessica Garcia, Resolution No. 2023-29, a Resolution Directing the Office of Cannabis Management



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to File a Notice of Emergency Adoption and Proposed Rulemaking Concerning Amendments to Cannabinoid Hemp Regulations, was approved unanimously.

- Chair Wright provided an overview of Resolution No. 2023-30, a Resolution Directing the Office of Cannabis Management to File for Emergency Adoption and Revised Proposed Rulemaking of Certain Violations, Hearings, and Enforcement Regulations. As part of the Violations, Hearings and Enforcement Regulations that was put into emergency status is expiring on August 6th. This emergency regulation will ensure that the violations, hearings, and enforcement structure stay in place and that they can continue to investigate violations and enforce on any unlicensed or illegal activities throughout the State. This package also contains a revised rulemaking for the Part 133 regulations which contain additional changes from the assessment of public comments from the proposed rulemaking. This package would also merge Part 133 for violations of licensee activities that was voted on in April and Part 133.32 for unlicensed activities that was voted on in June, and together they will be treated as one part. At the end of the revised rulemaking period, the entire Part 133 can be adopted.
- Upon a motion from Board Member Jessica Garcia, and a second from Board Member Jennifer Gilbert Jenkins, Resolution No. 2023-30, a Resolution Directing the Office of Cannabis Management to File for Emergency Adoption and Revised Proposed Rulemaking of Certain Violations, Hearings, and Enforcement Regulations, was approved unanimously.

- Chair Wright provided an overview of Resolution No. 2023-31, a Resolution Permitting Hope Knight to Hold Public Office and Serve as a Member of the Cannabis Control Board. These positions include the following:
 - President, CEO and Member of the New York State Urban Development Corporation (dba Empire State Development); Commissioner of the New York State Department of Economic Development
 - Member, New York Job Development Authority
 - Member, New York Transportation Development Corporation, ESD
 - Member, Public Subsidy Board, New York State Department of Labor (DOL)
 - Member, East Harlem Tutorial Program Board of Trustees
 - Trustee Emeritus, Marymount Manhattan College Board of Trustees
- Upon a motion from Board Member Jessica Garcia, and a second from Board Member Jennifer Gilbert Jenkins, Resolution No. 2023-31, a Resolution Permitting Hope Knight to Hold Public Office and Serve as a Member of the Cannabis Control Board, was approved unanimously. There was one abstention from Board Member Hope Knight.

- Resolution No. 2023-25, a Resolution Authorizing Temporary Retail for Conditional Adult-Use Retail Dispensary Licensees Showcasing Adult-Use Conditional Cultivator Licensees and Adult-Use Conditional Processor Licensees and their Cannabis Products at a Location and on Terms Approved by the Office of Cannabis Management, referred to as the Cannabis Growers Showcase, was revisited by the CCB.
- Chair Wright asked Board Member Jennifer Gilbert Jenkins if there was an amendment that she would like to move.
- Board Member Jennifer Gilbert Jenkins commented that there is no detail here that is representative of the detail of the summary that was given and that this is just to allow this to



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happen and that is fine and that they can move with that and what they are approving still requires a conversation. She stated that she is comfortable with this, which is just saying that these can happen, but that since none of the detail is on this, she is comfortable with moving forward and continuing this conversation about what those details are and if those open house events are being planned for the near future, then they should have this conversation soon.

- Executive Director Chris Alexander commented that they can have this conversation today.
- Upon a motion from Board Member Jennifer Gilbert Jenkins, and a second from Board Member Adam Perry, Resolution No. 2023-25, a Resolution Authorizing Temporary Retail for Conditional Adult-Use Retail Dispensary Licensees Showcasing Adult-Use Conditional Cultivator Licensees and Adult-Use Conditional Processor Licensees and their Cannabis Products at a location and on terms approved by the Office of Cannabis Management, was approved unanimously.

- Chair Wright asked for a motion to enter into Executive Session to discuss potential litigation matters. Board Member Jennifer Gilbert Jenkins moved the motion to enter into Executive Session and Board Member Hope Knight seconded. Board Member Adam Perry opposed the motion. There was no action taken during Executive Session.

- Executive Director Chris Alexander provided his Executive Director's report.
 - Enforcement Update
 - Using new authority from the law signed by the Governor to expand enforcement capabilities, OCM and the Department of Tax and Finance began regulatory inspections on unlicensed businesses on June 7th.
 - In coordination with the Department of Tax and Finance, the Enforcement team conducted 53 regulatory inspections at illicit cannabis dispensaries across the state including NYC, Central and Western New York, the Finger Lakes and the Southern Tier.
 - The Administrative Hearing Process is underway with the first decisions being issued this week finding illicit activity.
 - Market Update: Dispensary Openings/Sales Updates
 - There are 20 retail stores opened across the State of New York.
 - There are new operators in Buffalo, Long Island, the Bronx and Syracuse.
 - On average, retailers have taken approximately four and a half months to open from the time they have received their licenses.
 - Market Update: Retail Sales Growth
 - The sales growth from May to June increased by nearly 50%.
 - Consumers have spent over \$33 million on legal adult-use cannabis this year.
 - Market Update: Addressing Existing Consumer Demand
 - According to the US Department of Health and Human Services, approximately one-fifth of New Yorkers consume cannabis at least once a year, and 16% consume cannabis at least once a month, with demand largely met by unlicensed operators.



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- The scale of the demand currently being served by the unregulated market is reflected in the data from enforcement actions with approximately \$11 million worth of product being seized.
- The Retail Integrated System Expansion (RISE) Strategy
 - Expand CAURD – Accelerate retail buildout by licensing qualified CAURDS.
 - Cannabis Grower Showcases – Expand consumer access to legal products. Enable consumers to meet licensed producers and retailers.
 - Simplify Location Siting – Ease business siting challenges. Facilitate increased delivery access statewide.
 - Stimulate Research – Create opportunities for research into products, consumers, and industrial applications. Attract the best and brightest to research in New York.
 - Increase Enforcement – Target stores competing against legal operators. Seize unregulated and untested products.
 - Educate the Public – Communicate the benefits of the legal market. Introduce licensed operators. Explain the risks of illicit cannabis.
- Application Timeline
 - At the September Board meeting, should the general adult-use regulations be approved and go final, OCM will present the universal app to the Board to open up licensing for the additional licenses contemplated in the MRTA.
 - The Office is required to expand the Registered Organization (RO) population and has been working to finalize the application. ROs are intended to reflect the diversity of the state as is required by law.

- Members of the public were provided the opportunity to address the CCB during the Public Comment period. Participating individuals must limit their remarks to two minutes and remarks should be related to agenda items. Public Comments are listed in Appendix A.

- The CCB adjourned the meeting.



Appendix A

NYS Cannabis Control Board 7/19/2023 Meeting – Public Comment

	First Name	Last Name	Organization (If Applicable)	Public Comment
1.	Margaret	Mikol		Thank you all for the hard work. You hear the celebration here. There are some of us really still suffering. Chris, you made reference to it. We need those licenses desperately. We have sunk our livelihood, our retirement. We have a women owned business. We are dying to get started. No financial help is coming our way until those licenses are out. We're giving you homework. Because you've done so much, we know you can do it. Please, we implore you to not forget us and get those licenses out because we're desperate. We're paying taxes out the yin yang on our farmland. We can't produce anything. We can't do anything because we based our scale on the original legislation as it came out. There's nothing more desperate than what we're feeling today. Help us, please. Thank you.
2.	Walter	Iwachiw		Good morning. My name is Walter Iwachiw. You can contact me by Googling WalterSpaceIWA. I'm here asking the board to consider expanding the CAURD licenses to all applicants and to provide assistance in their applications and to allow for immediate deliveries for those applicants since there's no other funding available, at least they can start selling, start collecting taxes and start building toward a future. Thank you.
3.	Art	Massolo	Cycling Frog Beverages	First of all, I want to congratulate all you guys who just got licenses today. Congratulations. I unfortunately am from the hemp industry and have a couple of things I need to say. Members of the New York State Cannabis Control Board, good morning. My name is Art. I'm here to speak on behalf of the Hemp Beverage Alliance as a member of its board. I'm also the Vice President of Business Development at Cycling Frog THC Seltzers, a company committed to delivering healthier beverage alternatives for individuals who choose to enjoy their leisure time responsibly. Cycling Frog is proud of our ten-year history in the hemp industry, where our focus has always been on promoting wellness and supporting the community. Also in attendance is Bruce Norberg, CEO of Glasgow and Meyer, Cycling Frog's distribution partner here in the great State of New York. They are respected alcohol distribution company that has been in the forefront of alcohol distribution industry for nearly nine decades. Together, we aim to offer beverage choices that align with the evolving



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	First Name	Last Name	Organization (If Applicable)	Public Comment
				<p>preferences of the consumer in traditional CPG retail channels. Cycling frog has been selling in the New York State market to only hemp licensees who strongly enforce 21 Plus since February without incident. We are hoping our first meeting would be to discuss implementing tax rules on hemp beverages and are open as brand owners, distribution partners and as an alliance to have an open debate on this issue. The Hemp Beverage Alliance was formed three months ago and now it has an impressive membership of around one-hundred hemp beverage brands, as well as service providers, distributors and retailers. We all share a common goal to create a hemp beverage marketplace that is transparent, sustainable and provides consumer with the highest quality hemp derived products. I won't tell you anything more about that. We're here to discuss three key points that we consider proposed guidelines governing THC and CBD ratios serving size in the timeline from implementing changes. Firstly, the proposed ratio of CBD to THC at 15 to 1. There are studies that we would be happy to share with the state that there are adverse effects when much higher CBD doses mixed with low dosage THC in the human body. I have so much more to say. I sent it to you guys. I really wish that we could have spoke, had a conversation about this before. We're here to work together with you to figure this out, and I hope you give us a chance to do so. Thank you.</p>
4.	Assembly Member Harvey	Epstein	Assembly Member	<p>Good afternoon, everyone. Thank you for taking the time. Tremaine, Good to see you. Chris, Good to see you. I've been privileged to be in the assembly representing the Lower East Side side of Manhattan. I like it. I was proud to be a co-sponsor of the MRTA and push for its passage. What we experience in my district, and we've seen around the city is a really proliferation of illegal shops. I know we gave you all more authority this year to try to shut them down. I have to say that for the shops that are open, that legal shops are opening up in my neighborhood. They're having a hard time competing against all the illegal shops because of the structure. Whatever we can collectively do to increase enforcement on the illegal shops too, so the legal market can really thrive is really critical. Communicating that to us in a really regular ongoing way would be really helpful. Getting monthly updates about like what you're doing on enforcement is great that you presented it to us all today but getting emails that we can really get that out to the community, getting information about what we can be doing to help you is really important and making sure that this meeting and all meetings are transparent and open. Great turnout here. I've heard from</p>



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	First Name	Last Name	Organization (If Applicable)	Public Comment
				a lot of people. They just need more information. I think it's our responsibility to get that information out. For the legal shops in my neighborhood, thank you. Because I know that's so important for thriving businesses. For the illegal shops, let's do what we can to get them closed so we can really have a robust market and work with us in the state to make sure this all happens together. Thank you.
5.	Hugo	Rivas		<p>I'm going to be nervous. Work with me. First of all, thank God for the opportunity. This is a blessing. I got my license in April, so I was part of the third round. We would like it to be known that we fully support OCM. We appreciate all of the work that all of you have been doing for the cannabis industry in New York State. We understand the difficulties of the cannabis industry in its beginnings and having social equity justice involve individuals at the first licenses doesn't make anything easier to create. So many hurdles, obstacles, challenges, criticism, doubts and more than a handful of haters, which in New York State cannabis industry fails. Our unity is key to the success of New York City cannabis industry rollout. We currently have twenty dispensaries open and slowly but surely the progress is happening. We applaud you for the initiative to start this program. We are part of this journey that you all started and now we are making history together as we do work and we will work with our people, our communities, our leaders, our elected officials. We will do our part to educate them on our regulations, our safety protocols, how our dispensaries who function in a community, how financially towns will benefit from cannabis tax revenue, how shops are popping up on Long Island, bypassing regulations and not bringing in tax revenue for our communities. This is an issue. We will address it as well. We have started and will continue to have conversations with Nassau and Suffolk County police departments, fire department officials, EMS agencies, religious groups, other Long Island organizations. We want to hear what they want to say about cannabis in the communities and their opinion matters. We want to be respectful of what they say. Long Island's called cannabis cultivation continue to be a part of reaching out to the Long Island licensees and any other licensee. Our process is the cultivators, ancillary companies and individuals that just want to be part of the industry. You can come and join us. We will support you. We will help you.</p>
6.	Jeffrey	Hoffman		Good afternoon. My name is Jeffrey Hoffman. I'm an attorney here in New York City. 212 CAURD licenses, pretty, pretty, pretty good. Congratulations to everyone that got one. The hard work begins now. That means you.



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	First Name	Last Name	Organization (If Applicable)	Public Comment
				<p>That means everyone in this room. That means me. That means the folks on the board. That means the folks at the OCM. We got to make sure you get open. We got to make sure you get the support that you were promised financially. Resources to help you be good business folks. Help you get your stores open in places where the jurisdictions are not making it so easy. We need to think about that thousand-foot rule and some of the crazy rules, particularly out on Long Island where this is happening. We also need to think about the CAURD applicants that haven't gotten their licenses yet. We need to make sure that everyone that is eligible receives a license. When we look at the things that you were talking about doing today for the farmers, I agree we do need to see the details. The details are critical, but it is critical that we help the farmers. We must get through that backlog. We must support those farmers so that they are able to recoup the expenses that they had in growing those crops. I want to make two brief comments about expungement and medical cannabis. I want to thank Damian Fagan for his assistance in getting a modification to the expungement law that corrected an error that was made in drafting the law that caused some problems. We're still having real problems across the state in the more conservative parts of the state where the DA's and the judges are not doing what they're supposed to do. They are not following the law. I have several appeals in place where we're dealing with that, and we need your help as a board, as an OCM to deal with those issues. Finally, when it comes to medical, there are a couple of things that I think we need to examine. There was a bill a couple of years ago which would have allowed companies to cover medical cannabis and require the state entities to cover it. Finally, we need to require the doctors understand the endocannabinoid system and that they take a CME when they get their licensing. Thank you.</p>
7.	Jeff	Jones		<p>Ladies and gentlemen of the Cannabis Control Board, thank you for listening to our comments here today. My name is Jeff Jones, an AUCC pot farmer based in the heart of the Finger Lakes emerald necklace. I believe in the awesome power of cannabis to ##### the world to make righteous contributions to some of the most intractable issues of our time. I come here today not to berate, but to educate and to humble myself before this plant and its community. I'm asking all of us here today to please stop and listen to the wisdom of this plant, because she is trying to tell us to stop participating in the business-as-usual economy, which while very measurable and formal and bankable and taxable and track and traceable, it also with</p>



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				<p>every transaction contributes to human misery and environmental degradation. She is asking us to stop with all of that. Now, to start moving on to the next economy. We have a beautiful opportunity here in New York, an opportunity to work together across the supply chain to leverage the disruptive economic power of cannabis to kickstart New York towards the next economy, one in which with every transaction, we make our lands healthier, our people stronger and more fulfilled and our communities more resilient. We need to stop dawdling and sustainability and being less bad and start striving towards regenerative and being actually good. Unfortunately, it seems New York is about to make a grave mistake with its fledgling cannabis market and squander this once in a generation opportunity against their earlier word and the initial intention set with the MRTA. They are about to allow large multistate operators to enter the market three years ahead of schedule and to come in heavy, not supplying just their own shops as was promised, but with active plans to take over the entire wholesale supply chain. They are attempting to execute letters of intent as we speak, to be the sole supplier of indoor cannabis to CAURD retailers abusing their power to maintain their monopolistic control of the marketplace.</p>
8.	Vladimir	Bautista	Happy Munkey	<p>Vladimir Bautista, the CEO and Co-Founder of Happy Munkey. Honored to say we got awarded a license today. Well, I want to thank the OCM and the Cannabis Control Board for the opportunity. I want to thank my team, which is here. I want to thank my family. Most importantly, I want to thank the community because you have all supported us through the good, the bad and the ugly the last six years. We appreciate you. We look forward to bring over 100 years of legacy New York's experience to the legal market and add value and integrity to this market. Make sure that the morals, principles and values of New York culture cannabis does not get lost in this process. We must also remember that we stand on the shoulders of so many people that got killed, so many people they got deported, so many people they got arrested. We cannot take this opportunity and forget what it took to get here. I'm really, really honored to get our opportunity. I also want to say that none of us are free until we're all free. I look forward to the rest of the people like us that are waiting in the wings for them to get their licenses. I just want to say that it's so ironic for a Dominican kid that grew up first generation immigrants not too far from here on 139th and Broadway that got arrested over twenty-two times to be back here now for the same thing that they persecuted and</p>



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				demonized me for, to get an opportunity to uplift my community and love my people. It was a full circle moment. Remember, ladies and gentlemen, we don't do it for the Klout. We do it for the Kulture and not the vultures. Thank you all.
9.	Charles	Robinson		Today is a very important day. Why is it a very important day? Because we all part of history. One thing about this, this physical journey of life. One thing about this physical journey of life, you never know its history while you living it. We're a very important part. Our grandkids going to be able to look back and say, my grandfather did what? He did what? He stayed in the frame to be here today. I just want to let everybody that got a CAURD license to know Business 101. We're all being afforded opportunity to have a business right now. If your business fail is management fault. All businesses are designed to succeed. If it's fail, it's management. Usually why management failed is they don't understand that the customer is always right.
10.	Naiomy	Guerrero		Hi, everyone. My name is Naomi Guerrero. I want to say congratulations to all the licensees. I remember when I got the license in November of 2002. I'm part of the first round of licensees. I'm standing up here. I have a license with my father and brother. I'm the proud daughter of a legacy operator going all the way back to the 1980's in the city. I just want to say that it's amazing to get the license. It's even more amazing to get open. We've had a really, really hard time in this process after we got our license. We really need the promises that were made to us in terms of funding to come through, because what's happening is that people who have access to capital, which are not the people who come from the communities that I represent this legacy background, those are Afro-Latino, Afro-Caribbean and African-American, and that's Black people, our Black brothers and sisters that were on the boat and in Rikers and incarcerated. Those are the people that have the least access to these funds to be able to open up these stores. What's happening? We're getting hit up for predatory deals where people are coming in asking us for 50%. I'm not giving nothing to nobody that wasn't helping me put money on books for my family. I want to get open. I want to own it. I want my father to own it. I want my brother to own it. I want us to own it. I don't want to give it to anybody else because I know that we can do it. I need your help. I need that cash now.
11.	Joel	Nolascio		Good afternoon, everybody. My name is Joel Nolascio. A recipient of a CAURD today. What I want to say is I want to echo some of the things that some of the other folks here. I myself am a first generation of a Dominican



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				immigrant that grew up in what most people would consider the hood. I've seen my share things. I've seen what weed has done to the community where I grew up. I saw the people who took away from me; family members, friends, people that I thought I was going to see forever. It is a full circle moment. I vow to, with this opportunity to give back to the community that I come from where I am now, where we're going to open up and to continue to grow this culture, because we continue to grow awareness of what we do and why we are here today. Thank you to the board. Thank you for the opportunity.
12.	Nichelle	Santos	CannaCoverag e	Good afternoon, everyone. I'm Nichelle Santos, Founder and CEO of CannaCoverage and also the State Director in New Jersey for minorities for medical marijuana. Congratulations to all the license holders today. We're so proud of you. The sentiments of everyone be before me that these are the people that have built the infrastructure of the cannabis industry for the last eighty to one-hundred years. What the former brother said, know your business. Understand the business of cannabis. Risk management is critically important to the longevity, the sustainability, the resilience of your operations to help protect public health and safety of the products, the efficiency of your business. We are here as a resource. We're also here as a resource for those who need to raise capital. We work with many, many partners. We don't have clients unless our clients get across that goal line. We're here to help the community. We've also been impacted by the war on drugs. We want to see this industry really thrive and be sustainable. Thank you.
13.	Jay	Moskowitz	Bimbo Beverages	Hi. I'm Jay Moskowitz, a lifelong New York resident. I'm the founder of Bimbo Beverages, a premium CBD drink. I'm also on the board of the Hemp Beverage Alliance. My most impressive accomplishment is recently becoming a senior citizen. I ride the subway for half price. It's the greatest. It can happen to you. Congratulations to all the license holders that were awarded today. Unfortunately for the hemp history, it's not a day of celebration. If we've learned anything over these past years about the cannabis industry, it is If you issue rational, logical regulations, it will encourage responsible brands and responsible people to be compliant with those regulations. If you issue incredibly stringent regulations that no one is going to abide by, you're only going to invite bad actors into the industry. Unfortunately, that's what happened today. Under the dark of night the board issued emergency regulations without consulting stakeholders. They're just going to push all the responsible brands out of the market. You know what's



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				going to happen? There's going to be unsafe drinks manufactured in unsafe facilities with 50, 75 milligrams of THC rather than a low dose of 2 to 5 milligrams to introduce people to THC. I urge the board to reconsider and at least listen to some of the stakeholders that have been doing this for years to get their opinions. Thank you.
14.	Jillian	Dragutsky	Astro Management	My name is Jillian of Astro Management, newly licensed. I'm also Co-Chair of the New York Heart Coalition Women's Committee. I'd like to thank you all for this amazing opportunity. I never thought, as a former felon or as a felon, that I would have an opportunity like this. I'm a second-generation cannabis felon. This is quite amazing. I'd like to point out that women are grossly underrepresented in cannabis in general and particularly in the CAURD program. Please consider licensing more women. We need a voice in this industry. We need a place in cannabis. Second, Long Island needs your help. Access to viable real estate is crucial to the success of this program and to normalizing cannabis in our society. I strongly urge you to reconsider the admittance of the ROs in December. You need to give the small operators like us, people in this room the opportunity to establish ourselves. Finally, the CAURD program looks considerably different today than it did at its inception. Please be cognizant of this and consider expanding and developing assistance and programs to foster the success of this program. Thank you all so much for your time. Thank you for everything that you've done. If anybody here has been newly licensed or you're still an applicant, please find me after the meeting. Let's talk.
15.	Nicole	Ricci	NY Small Farma	Good afternoon. Thank you for having me. My name is Nicole Ricci. I'm the President of New York Small Farma. I'll be making my comments on behalf of the organization. I'll try to jump through sincere slamming the gavel on the two minutes. Our mission is to foster a socially just, environmentally regenerative and economically inclusive cannabis community. We use the word community intentionally in our mission. We're not looking to support an industry. We're not looking to support business as usual. We think this is an opportunity with a new industry to usher in a new economic model. We've seen the models of large-scale agriculture, big box stores and large corporations pollute the environment, run small businesses out of town, and leech their profits out of the state, back to their headquarters, away from the communities where they made their money. In New York, we are surely aware of how these corporations impact communities when they finally pack up and leave and leave



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				<p>a rust belt behind. That's exactly what we see happening in these regulations. It's business as usual. You have 280 cannabis farmers that are mostly going to get a conditional license. They will get a full license when license opens. Most of them grew one acre or less of cannabis. They're having problems moving their product in the supply chain, as you're well aware. Now, you've rolled back the decision to keep the ROs at bay, and you're allowing the ROs in and you're allowing them to enter those dispensary shelves on day one of the market. You're allocating them 100,000 square indoor grows, which they can turn over five times. You're adding an additional million acres on to the market and competing directly with those farmers. This is before you've even opened it up for micro and the lower tiers. You're doing exactly what you shouldn't do. You're creating a flooding of the market. We know when that happens the prices fall and the ones that survive are the ROs, the ones with the money and they squeeze everyone else out. We know this because we've seen it in every state beforehand. We know that it's going to happen. And also in the throes of such a scale are not only economically outcompete everyone else they're also bad for the environment. They just push carbon out into the environment. New York State is spending billions of dollars to reduce carbon emissions today. The last point I really want to make, actually, I'd like to make two points, if I may. It is in writing. We are submitted in writing, but it's also the point of bringing this information to the public as well. You have a racially bifurcated system. You have all white males growing cannabis.</p>
16.	David	Nicponski	Freshly Baked NYC	<p>Thank you to the control board for your actions here today and for the opportunity to speak. I'm David Nicponski, Co-Founder of Freshly Baked New York CAURD licensee and a member of both and the broader industry community. Quick comments first. To the board, thank you for your approval of the new licensees and the growers showcases. We all look forward to hearing the details of the latter in the coming days. To the new licensees, congratulations. You made it. I can empathize with your feelings of distress over the last eight months. Take a deep breath and celebrate today. The hard work begins tomorrow. If you are not part of our communities, please join them. We are here to support you and help you succeed. To the remaining applicants, keep the faith. We're pulling for you, and we'll support you when your term for licensure comes. Control Board members and OCM, please license the remaining applicants. Finally, and most importantly, to the policymakers who have been working on the Grower</p>



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				<p>Showcase to the extent legally possible, please include provisional CAURD licensees in this program, perhaps by making the program a pathway to getting the full conditional license. The program is an essential step in helping distressed cultivators upstream in the supply chain, a significant concern for the retailers and frankly, everyone in the industry. A healthy top of supply chain is necessary for everyone else in the chain who follows. While helping our cultivators, we can simultaneously address the source of the problem, the bottleneck of missing retailers. We can do this by expanding the pool of eligible showcase retail partners without reducing the revenue flowing to the cultivators. Indeed, since retailers are the scarce component now, this could even increase the number of showcases which happen, specifically including provisional licenses in the program and letting them use this as a channel to acquire their conditional license will allow them to generate revenue and start building capital. As my fellow Bronx licensee noted, capital access is a necessary step for nonfood retailers to open their retail locations. After today's vote, there are more retail licensees who are non fund eligible than there are fund eligible, and there are substantially more provisional licenses than fully licensed and operating. Capital availability will be the key ingredient and quickly. Removing the retail bottleneck would solve not only the immediate crisis but also the underlying cause. Focusing only on the symptom without addressing the cause would be short sighted and a squandered opportunity. We can and should solve both. With this relatively simple idea, we will. Thank you.</p>
17.	Jose	Polonco		<p>Hey. I'm not used to doing this, but I'm going to do it. My name is Jose Polonco. I'm also a first generation Dominican. Thank you guys for, you know, put him in a room with a few first-generation Dominicans, which are older than me, and they inspire me to be in this moment. Thank you, you guys, for giving me an opportunity. My issue is I want to tell everybody what's happening with me. I have a great location. I got a great deal. I'm too close to Medmen. My option is to wait for Medmen to either stay in business with this new \$5 Million, they get to pick a location or I got to just give up my dream of opening this location, which it costs me money to find. It costs me a lot of effort, a lot of working, a lot of effort. Like I said, I'm a first generation. I came over here at 93. I was nine years old. To have this opportunity and find a place that I really love, and I think I can make generational wealth for me and my family and to put a name for my Dominican people and everybody and a program. That's what I would like to do. I</p>



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				just want to let you guys know before you find a location, do your homework before you spend any money on lawyers, before you spend any money. Please do your homework because it is costly and it's not cheap.
18.	Dasheeda	Dawson	NYC Cannabis	<p>First of all, congratulations to all of the approved CAURD licensees. One more time. We have over 400 CAURD licensees and more than half in NYC. My name is Dasheeda Dawson. I'm the founding Director of Cannabis NYC. We are thrilled at Cannabis NYC of course, but we know this is now for the work to begin. You have a license. We need to get you open. Even more laser focused on our mission to become the global cannabis capital the right way, centering equity and furthering our education about this amazing plant. While the state has been hard at work, we have been working really hard here in NYC as well. You've seen me on my Lift Off Five Borough Tour. We continue that. Our interagency partners at the Department Are Building Services actually released a guidance doc for CAURD licensees. We'll be launching a fast track for cannabis entrepreneurs, a free ten-week entrepreneurship course that will support those interested in launching cannabis related businesses, ancillary businesses, including future MRTA licenses that will open. We also have our Business Solutions centers being prepped with more cannabis competent account managers for 101 business planning, marketing and license applications. I'm really here to talk about this week our desire to remove as many barriers as possible. One of the first things I did when I got into my role was go after the bag. I'm proud to announce the launch of the Cannabis NYC Loan Fund. This RFP is a partnership with our New York City Economic Development Corporation. It is just the first step. I'll say that again. It is just the first step, but it's an important one because it's one that shows that New York City and our Mayor is demonstrating a commitment to eliminating these barriers of access and entry, particularly for folks who are social and economic equity applicants. What I will say about the fund, a real high level, is it is a fund that will lend to license cannabis businesses in New York City only. I love y'all, Long Island, but New York City only. It will be run for businesses that are run by social and economic equity applicants. It will be covering startup and ongoing operating expenses. In addition to capital, the boroughs will also receive a technical assistance program through our office at Cannabis NYC. Now, this RFP is not about giving loans to borrowers right now. You all know government moves slow, but I like to be transparent about how we move it. The RFP in seeking a loan</p>



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				<p>administrator, number one, who originate structure and close and manage the loans as well as number two, other lenders are capital partners to triple the size. We invested \$8 Million at zero interest, and we want to triple it. We also know not all money is good money. We're here to deliver a return on equity investment. We're calling to the table partners that are interested in investing in equity. We're not talking about investing in the green rush and the cannabis industry and this short-term play. We are in it for a long-term play. I feel like if you know that you have equity as your mission with your business and that is your call to action, then maybe you might want to partner with the largest city in the country, the financial and cannabis capital of the country, and we're saying we're investing in equity. I'm excited. I know I'm at time. I got a couple more minutes. What I will say is it's record time is record time, and this RFP is just a first step. Send people our way. Government moves slow. We anticipate launching being able to give actual money out by the beginning of 2024. I know I sound crazy. However, in the meantime, we've been working with our CAURD recipients with the networking events. We have an interagency hub, a free resource in the services that are going to be just in time for this universal application to launch in September. Again, this is still just the beginning, y'all. I want to thank OCM for your work and the continue partnership for this historic experiment. We knew what we were doing. It's a mission. The work continues. So let's go, y'all.</p>
19.	Cornelius	Jones		<p>Good evening, everyone. I want to say congratulations today. Those here and not here. Thank you, Madam. Thank you and the board members. I know that basically what I got up here to say, everybody that said it, you know, I'm a part of the LICC. I just want to say thank you. I want to say thank you to the board. To you, Madam and everyone right here, because I know it's a difficult time. We have a difficult situation. The young ladies, she's pissed off about that money over there. I know that. You just got to be patient. It's a process. You got to be patient. Thank you.</p>
20.	Scheril	Murray Powell Esq.	The JustUS Foundation	<p>Good afternoon to the OCM and to our cannabis family, our very diverse cannabis family. My name is Scheril Murray Powell Esquire. I'm a cannabis attorney. I run the Justice Foundation. We help legacy operators get into the legal cannabis space. I like the roster that I see here for this delivery of licenses. The Justice Foundation has gotten Justice Fellows licenses in every single round that the OCM has had for the CAURD license application. I want to thank the OCM for their commitment to equity and using their authority to make sure that we're building a high</p>



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				<p>performing, robust cannabis industry for the State of New York. I think what this experience has taught us is, you know, we have to really learn to celebrate people when they're winning. We're not just yet. We got to get better at that. Because it will be our time. There are a lot of people who I see getting licenses now in the last couple of rounds that they were getting discouraged. But, you know, when people around you are winning, that means it's getting closer to you. Keep that in mind. That's my advice for the people who haven't yet gotten their licenses yet. I also want to recognize another OCM program, which is the Faith based Conversations program. They are meeting with Rastafari and other individuals who haven't been recognized as far as the delivery of licenses or the issuance of licenses. I don't see Rastafari besides myself in this room, but I am confident with this faith-based program. Thank you, Jason and Julianne and Neveline and of course, Chris and Tremaine for creating this program, recognizing that across the country we're not seeing our Rastafari, Hindu and other faith-based communities that use ganja, sacramental and ceremonially. I look forward to when we have the next round of license opportunities that we're going to see some additional representation. I like the legacy vibe today and I want to see more of it in the future. Thank you so much.</p>
21.	Leeann	Mata	Weed Growers from Seed to Stone	<p>Hello, everyone. I was a New York City teacher two years ago before I dipped my hat into the cannabis field. I'm an author, so I took teaching to another level. The first edition is teaching New York City people like us how to get the license broken down and then it's also how to start the business. My thing is education. Education about what the flower do. My Mother died three weeks ago. She was addicted to opioids. She left it alone for cannabis. She stood for cannabis. She believed in the rubs for the pain. She understood that the fact that we needed access to it. We don't need to be denied it. We need a right to be able to say, Hey, I want a blunt, because I'm in college and I have anxiety and I was 22 in Medgar Evers when I got stopped. I wasn't selling it. I was dealing with law. I had anxiety that released it for me. This plant save lives, heal lives. Thank you. I'm a CAURD holder. My business is Weed Growers from Seed to Stoned, because I believe everybody deserves the right to be stoned. Thank you, Tremaine. You are a family friend. I just want everybody to understand that this is about the love of the plant, the medicine of the plant, and the inequity of the plant did not want us. Thank you.</p>



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22.	Willa	Smiley		<p>Good afternoon. My name is Willa Smiley. I am a registered nurse. I am in the health and wellness educational space. I am here because I like to continuously encourage the board to start to have educational public health campaigns. I'm in the health and wellness space. I want to focus on seniors, baby boomers like myself. I do teach them why example, why cannabis works for their glaucoma. I like to make it as simple as that for our elderly. I'm also looking at access, a little bit of research that I've done. I live in Manhattan. I know most of the senior homes. I do know most of the dispensaries are Downtown. How does Miss Jones going to get downtown to get her glaucoma? On the subway or on the bus and again, as whoever was talking about, the insurance. Who's paying? I'm in that space. I am an educator. Please contact me. My website is one word learning or the word Continuum.Biz. Please go to it and let's talk.</p>
23.	Roger	Thomas	Mellow Tymes	<p>My name is Roger Thomas, Co-Founder of Mellow Tymes, a CAURD licensee. I want to thank the State New York, giving me the opportunity to participate in the program. Equally important, I want to highlight the addition of Ms. Knight for the esteemed board. Mellow Tymes hopeful and prayerful that Ms. Knight will bring her expertise to the program as well, as well as the resources of the Empire State Development Corporation. While we appreciate that and these efforts, it's time for the EDC to usher in resources and technical assistance. Whether it is called agency or not, New York State licensed cannabis businesses like Mellow Tymes, the Auto Register start up in New York State. Therefore, under a MRTA law, the New York Urban Development Corporation Act is mandated to provide funding for CAURD licensees. The EDCs under the Cooperation Act. We have reached out to the Bronx Economic Development Corporation, which is a subsidiary of the EDC. We have started a process of trying to secure funding, but a requirement is very stringent. Regardless of the discouragement, we will meet those requirements. Therefore, we request that Ms. Knight and the EDC create a process or program geared towards CAURD licensee or other source equity in the spirit of MRTA of 2021. We hope Ms. Knight will help fund us. That's it.</p>
24.	Howell	Miller	Two Buds Enterprises	<p>Hello, everyone. My name is Howell Miller. One half of Two Buds Enterprises, which is a newly licensed CAURD holder. I want to thank God first. I want to thank the board for giving me this opportunity. I want to thank the Bronx Defenders Office, all the coalition that's all here helping us to move this initiative forward. I am a legacy guy. I've been selling cannabis since I was ten years old.</p>



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				My parents are Jamaican. Jamaicans was the first one to sell weed in New York. You know what I mean? It's not many of us in here. I'm here to represent. You don't have to be dressed to be Rasta. I want you to know that. There's Rastas in here. I'm here to represent my community and to uplift my community and make everybody aware that this plant is not a bad plant. I've been in it since I was ten. Look at me. Nothing wrong with me other than getting incarcerated for it. I'm speaking from the heart because this means so much to me and my parents and everybody that you know that's in it. Thank you.
25.	Pilar	DeJesus		Good afternoon, everyone. Congratulations to all the CAURD winners. I want to start off by saying thank you to the OCM. I really have a lot of respect, especially for everyone here, especially also for Chris, since we worked alongside on the MRTA together. I want to be very clear that a lot of my comments are not directed at the OCM. It's directed to their boss, the Governor, someone who doesn't know what cannabis is and was not a part of the process for legalization. As a community member or organizer, a leader in the city, and the person who Chaired the Community Reinvestment Working Group and the coalition, the Start Smart coalition that worked on the bill that so many of you are celebrating that you can do today. There are a lot of us going to Albany to get that thing done because it wasn't your politicians. They don't know what they're doing. They don't even understand the plant. I'm here to just express my frustration one and how the regulations happen coming out a week before Christmas, not giving us organizers enough time to organize, educate like that part was really ridiculous. Then we took a lot of time to submit a lot of comments and looking towards the regulations that don't really seem to be like what we fought for in the MRTA. I see there's no money for technical assistance. There's no incubator programs. The Governor has given the Buffalo Bills more money than she has given any money towards cannabis education. She gave Buffalo Bills \$4.1 Billion because they needed a new stadium. Where are the reparations that I fought very hard for? I don't see it. I don't see anything for us. We're celebrating for all the work that we put into. It's not playing out. We're not looking no different than the other states. Where's the money? In the city the revenue is over \$200,000 and I have not seen no money to counsel coming to us, to organizations, to educate the community. Even on that spreadsheet, you had education after enforcement. This is why we have a problem while we need it wasn't because the education isn't there and not being funded. You're not



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				funding the grassroots organizers that need to do the education in the communities that they believe in. No disrespect to the OCM or education, but it sucks. You need to really work with the community and that's why you get like the one enforcement triggers me. We're not doing it right.
26.	Mark	Robinson	Cannabis Flowers LLC	My name is Mark Robinson. I represent Robinson's Cannabis Flowers LLC. Last time I spoke in front of the OCM, I spoke with frustration. I spoke with hurt. I gave a conversation about the last time before my Father went home. He had a conversation about son, I believe in you. He said, but I have a son who spent twenty years in prison for a crime he didn't commit. I'm here today with my brother, Stevie Robinson and Mrs. Lumpkin. They are my co-defendants. I just want OCM to see the pain of somebody who did twenty years for a crime he didn't commit. We appreciate that you've come. Take your time and show your pain. Twenty years for a crime he didn't commit. First of all, my name is Stevie Robinson. want to thank you all for giving me and my family a chance to prove ourself that we could bring to the table. I just want to say thank you. I'm going to give you my all and do my best. Thank you guys a lot.
27.	Bazaar	Royale	The Brooklyn Bazaar	I'll make it brief. I just want to say congratulations to all the CAURD holders. Round of applause. Everybody's been doing that. Most of the stuff that I wanted to say has been said. I don't feel like burdening you with that. I'm just going to say congratulations again. This is a community. People have a hard job ahead of them. They've got a hard job ahead of them. Congratulations to the work you have been doing. We are looking forward to see what's going on. A lot of pain a lot of gain. I just want to say congratulations again to everybody that participates in it, no matter what side of the fence you on. Bazaar Royale is my name. The Brooklyn Bazaar is my game. You can come out August 12th to the Brooklyn Bazaar or Lexington between Grand where we're doing a live event with NYC Cannabis. We're doing education, we're doing panels, we're doing music, we're doing celebrations. Most of all, we do an education. I heard that is necessary. Please come out to the Brooklyn Bazaar August 12th from 12:00 to 8:00.
28.	Floyd	Jarius	Ganja War Veterans	How you doing, everyone? Congrats to all the CAURD licenses. I am the Founder of Ganja War Veterans for Equity, as well as a Program Director for the BMCC CUNY Cannabis Workforce Development Program down at 25 Broadway. Right over here at this desk you could grab a flyer for our program. Our program starts in October. We're going to begin with cannabis security solutions, training



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				<p>persons on the rudiments of cannabis security with standards, OSHA standards, MRTA standards to work in legal dispensaries, grow houses in the state. We're also doing cannabis manufacturing training and Cannabis Dispensary Associates training beginning next year. Thank you. Congratulations. Scheril, we all in here today. I want to shout out the seat of Dawson, who worked with the Ethiopia World Federation yesterday. We were literally down the block at the speaker's corner at the state building. It is happening. We are bringing those conversations not only to the OCM, but also the United Nations. To learn more about this, you can pull up to my community garden this Sunday, July 23rd, on His Imperial Majesty's Armstrong for Ganja in the City 12:00 to 6:00. Thank you.</p>
29.	Nubia	Ashley		<p>My name is Nubia Ashley. Actually, I got awarded a license today. Thank you, OCM. I appreciate it. Thank you to all the staff that I kept on calling and email. I'm gonna call you all tomorrow. Thank you. I sat with my sisters on the phone doing his application. I'm trying. They had to encourage my husband to do the application because he didn't think that the State of New York would right the wrong and give us anything. Thank you so much.</p>
30.	Jessica	Naissant		<p>Good morning or good afternoon to the OCM, the Cannabis Control Board, and to all my fellow licensees. My name is Jessica Naissant. I am a first-generation Haitian American biologist, serial entrepreneur, and as of today, a legal license holder in Brooklyn, New York. Thank you. Thank you. A lot of people were born into legacy and didn't have the choice but to maintain their family's businesses. That was not my story. I created my legacy because early on I learned cannabis could be used as a medicine and petty cannabis arrests that are still on my record because I pled down our Scarlet letter to myself into my family. I would like to advocate to the board to consider creating legislation to remove all cannabis related charges, even the ones that have been changed to other convictions, even felonies as well. Like Jay-Z said, I left the dope game with my record clean and I'd like that to be my story as well. Lastly, I truly want to thank you for honoring your stance on correcting the wrongs of the past by licensing justice involved individuals and their families. I have chosen to live to legitimize myself and trust the state's process. Please honor that by prioritizing the closing down of Empire Cannabis Club without persecuting the unknowing Black and Brown employees. I'm ready to get open and pay these taxes. Let's get this money, Brooklyn. Shout out to the Dope Connection.</p>



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31.	Joann	Kudrewicz		<p>Hi. I'm Joann, CEO of Ravenswood Genetics. I'm here today as the Chair of the Cultivation Committee for the Cannabis Association of New York. This is a big day for CAURD. I applaud you all. We are so grateful that you're going to be coming on board. It's also a big day for the cultivators. It was almost eight weeks ago tomorrow that at our town hall event that my committee hosted the OCM launched this idea of the Growers Showcase. We're truly excited that it's finally being launched. Thank you. I want to address something that Dr. Gilbert Jenkins brought up, and I always applaud and thank you for standing up for cultivators. This idea of biomass, because there are a lot of us, myself included, who are not on the shelves, who have a lot of product that needs to move. I happen to have a lot of flower. I could have pre-rolls till the end of time at these events. There are a lot of cultivators who only have biomass, whether intentionally or not, whether they grew for that purpose of processing or because of weather or pathogens. They have product that cannot be sold as flower but can be processed and manufactured into value added products. What I hear from them in my role as the Chair of the committee is that processors are not calling them back. They're not taking product because they can't move what they've already done. I just implore you to think about that whole sector of cultivators who may be left out if we don't allow them to sell their value added products. The processors work on splits, but manufacturers get paid when they get paid. There's an opportunity for the cultivators to move that biomass without any out-of-pocket expense and have something that can be shared at these events. I'm just speaking on their behalf. Again, I thank you so much for this amazing gift.</p>
32.	Jon	Freda		When will the micro business licenses be available?
33.	Tiro	Hub		I would like to apply for the micro-business license. I see in November it was published that a Draft license was completed. When can we expect license to be available to public?
34.	Jose	Family of the Cotto	Gold Kief Brand	There needs to be a for the customer base environment especially for those who have a profound history of being cannabis enthusiasts.
35.	Nancy	Sheran		<p>This comment is in reference to the following: The New York State Office of Cannabis Management has put adult-use cannabis regulations up for public review (https://cannabis.ny.gov/system/files/documents/2023/07/revised-adult-use-regulations.pdf).</p> <p>I oppose the addition of "on the same road" to the following section, and ask that this phrase be removed, because it is in conflict with the intent of the restrictions, which is to have</p>



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				<p>space between a cannabis facility, in the same way that there must be space between places selling alcohol, and houses of worship, schools and youth facilities, the latter two having vulnerable populations that are underage for these products. Pages 35-36</p> <p>§ 119.1 Preemption and Prohibitions on Municipality Rulemaking.</p> <p>(a) No municipality may adopt a local law which would allow an adult-use retail dispensary, microbusiness, ROD, or on-site consumption license to be:</p> <p>(1) on the same road and within 200 feet of the entrance of a building occupied exclusively as a house of worship;</p> <p>(2) on the same road and within 500 feet of the entrance of a building occupied exclusively as a school; or</p> <p>(3) on the same road and within 500 feet of a structure or its grounds occupied exclusively as a public youth facility, if the municipality has enacted a local law pursuant to section 119.2 of this Part.</p> <p>Wouldn't an unintended consequence of the wording "on the same road" allow a cannabis retail location right around the corner from a school, church or youth facility? I don't think that this is the goal. Let's keep our children safe. Remove "on the same road" from the above items.</p>
36.	Teri	Ridley		Will other non profits be awarded on this round? What happened to the 25 non profit licenses that were designated for non profits?
37.	Emma	Buttner	Jazzagram Records and Productions, Inc.	Introduction of Jazzagram Records and Productions, Inc.'s NY Recreational Cannabis Marketing Campaign for the purpose of increasing safe regulated consumer purchases of NY recreational cannabis products from licensed NY recreational cannabis dispensaries.
38.	Sheri	Rosen		The legalizing of marijuana has been one of the worst decisions. The smell is so pervasive throughout the city. The butts being left on the streets and then being consumed by dogs have increased emergency visits by 300%. In addition, I know of at least 2 cases of young adults suffering from psychosis after consuming or smoking pot. This is a very serious condition which will take months to overcome. At the very least the city should mandate lowering of THC levels to where it was in the 1970's.
39.	Daniel	Alexis	The dope connection	Brooklyn we about to take over the cannibus community
40.	Patrick	Cook		When will licensing for cannabis nurseries be adopted? Medical growing card holders currently have no way to reasonably source plants.



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41.	Kelly	Hilland	Brownies brand	We have been patiently waiting to show up on the approved CAURD list believing we did everything right yet after a year we have not made the list. Can anybody tell us what we need to do to make the list. Our CBD business is struggling so please tell us if we have a chance or not. People are telling us it's who you know and we are nobody who knows nobody but the cannabis control board whom we believe in. Just want to know if we have a chance thank you
42.	John	Ramirez	N/A	My colleague submitted an in person public comment at the June 15th OCM meeting which was held in Buffalo, NY after the board awarded additional CAURD licenses. I am submitting a written public comment due to my colleague's inability to travel to the in person OCM Meeting on Wednesday July 19th, 2023. The nonprofit organization we consulted for and guided through the application process was promised on multiple occasions by an employee of the OCM Enforcement Department that they would be awarded a license in the CAURD license round. These repeated false promises by the OCM Enforcement Department has put an undue financial burden upon a nonprofit organization that is dedicated to servicing returning citizens and financially stabilizing communities that have been most harmed by the war on drugs. We are wondering how Housing Works the nonprofit that was OCMCAURD-000001, could possibly submit a stronger application than our own when our organization operated a dispensary in California as our social enterprise. We also see that Housing Works was the first to apply in the whole state and the first nonprofit to be awarded a license, which leads us to believe that an inconsistent scoring system was used across all nonprofit organizations that applied for licensure. We suspect Housing Works' application score and all other nonprofit organization's that have been awarded a license were incorrectly scored at the beginning of the licensing process which has caused loss of economic opportunity and undue burden upon the organization we consulted for due to the fact that the organization lost out on the first movers advantage due to inconsistency in scoring. We lost out on first mover advantage due to the fact that Housing Works, a nonprofit organization that could not have possibly scored higher than ours, was awarded a license in the Manhattan Region, which is our organization's #1 region of preference. Our organization hopes that it does not have to litigate this issue and the state does what has been promised and awards our organization a license. Timeline On Thursday November 16th, 2022 at 12:30PM PST/3:30PM EST in a phone call with the enforcement



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				department we were informed that our application was cleared and being sent over to the licensing department for final approval. We were told by the enforcement department that our application would be approved at the next board meeting or worst case scenario by the end of the year (2022). Our nonprofit organization has been holding real estate for this application since November 30th 2022 after we were informed by the OCM's enforcement department we would be awarded a license. This has caused an undue financial burden on our organization. On February 17th, 2023, we were told on a phone call with the licensing department that our nonprofit CAURD application is in the legal department for final approval. Can we please have an update on the status of nonprofit license applications?
43.	CAURD	CAURD		When will CAURD applicant scores be revealed? How did you award the 40/100 points for "location at time of arrest"?
44.	Carl	Anderson	CAURD	What wisdom does the board see with issuing additional CUARD licenses, when their are people who were in the first round of 36 that haven't seen any movement towards their retail operations?
45.	Timo	Mack		Dear OCM, We have been working with many companies who have successfully transitioned from hemp to cannabis under the conditional-use license program. This transition has been a great success but has also required a monumental effort from those in the industry, both on the governmental and local fronts. Given the current market conditions, legislation, and other factors, we would like to get your opinion on the feasibility of transitioning from conditional-use licensees to recreational licenses in the near future. As the industry looks to the future, making this transition can be beneficial and realistic with the right investments and planning. We value your opinion and would appreciate any insights you may have on the matter. Please let us know if this is a feasible progression and what the guiding principles and timeline should look like. Thank you for your time and we look forward to hearing from you soon. Sincerely, Timo
46.	Domenick	DiCostanzo	DAD Distributors, LLC (CAURD applicant)	Board members, I am so happy to be here today. Thank you for considering my CAURD application. I never could have imagined having the possibility of opening a dispensary after prior marijuana-related charges impacted my previous career path. In the year since I first submitted my CAURD application, I have utilized BMCC's second chance program to go back to school to get my business degree in the hope that when I am approved, I am in an



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				even better position to do well as a proprietor. I'm grateful for the opportunities afforded to me by this city and state to turn my life around and succeed, in spite of — in this case, especially — prior choices and charges.
47.	David	N		My personal experience with Hemp products especially with measured doses of THC are perfectly safe and it is not a worry. As long as it is lab tested, has all the supplemental facts, and information properly labeled, also ID'ing the potential buyer to assure 21 and older, they should be allowed to sell. They are less intoxicating than marijuana derived products. There is no difference to a parent leaving an edible out or a hemp edible. It is the responsibility of the parent to make sure that does not happen. This should not affect or fall on the hemp industry's fault; they should be allowed to sell THC derived hemp products and not be prohibited. This would be an overreach by the OCM and would break constitutional rights as well as the right to pursue happiness! By the OCM attempting to prohibit the sale of THC derived from hemp would destroy thousands of small businesses, including processors, manufacturers, and cultivators. If this was a public health concern, then why legalize marijuana in the first place. If this is the case add a higher tax for THC derived hemp products, this would in return add revenue for state programs. But by trying to hurt the small businesses is hurting the state in the long run. Make the right choice to protect small family businesses!
48.	Lucas	Dobbins	Leaf Link NY LLC	We applied on August 26 TH 2022 for Adult-Use Retail Dispensary License. We reside in the Finger Lakes region. Can someone please answer how these applications are being reviewed. I know Finger Lakes in now open for licensing but, still not heard anything.
49.	Timo	Mack		Dear OCM I am writing to you in regard to the taxation of cannabis products. As I understand it, if a distributor produces a pound of cannabis with a COA of 20% (weight), the taxation on this will be 13% on sales and \$0.005 per milligram. If the pound was sold for \$2000, the tax on this would be \$260 in sales and \$453.39 in milligram tax, for a total taxation of \$713.59, or an effective tax rate of 35.68%. (The rate is higher for value added producers). This rate seems to be prohibitively high, particularly for small producers, let alone mid to larger operations that have invested heavily and have larger workforces and considerable overheads. I am asking if the OCM would take into consideration in reviewing the milligram tax (the greater of the two) and reducing it to a more equitable level. Sincerely, Timo.



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50.	Christopher	Budde	Brewed & Bottled, LLC	As with all THC products, the customer understands what they're purchasing and what will happen when they consume it. This is an overreach and knee jerk regulation. There are no problems with the alcohol industry producing the products that they do with high alcohol contents. This appears to be a predatory and discriminatory decision. The simple solution is to change labeling requirements and make the packaging clearer.
51.	David	Powers	D&s beer distributors inc	We sell cannabinoids seltzers to people ranging 21 years old to 80 claiming health benefits from gaining appetite, relaxation and better sleep. I believe there are way too many restrictions on cannabis as it is. A better alternative than the opioid pandemic.
52.	Nicholas	Gallucci		The CBD to THC ratio of 15:1 does not make any sense for the consumer. When cbd is added to THC, the blood levels within the brain can 2-3x the normal THC amount. If a user consumes 150mg of CBD with 10mg of THC within 15-60 minutes their brain blood levels would be equivalent of taking 30+mg of THC... There are documented government studies on this. https://www.hopkinsmedicine.org/news/newsroom/news-releases/cbd-may-increase-the-adverse-effects-of-thc-in-edible-cannabis-products-study-shows#:~:text=Contrary%20to%20some%20common%20claims,or%20a%20%E2%80%9Chigh%E2%80%9D%20sensation.https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9207456/
53.	Timo	Mack		Dear OCM, I am writing to you regarding the taxation of cannabis products. As I understand it, if a distributor produces a pound of cannabis with a COA of 20% (weight), the taxation on this will be 13% on sales and \$0.005 per milligram. If the pound was sold for \$2000, the tax on this would be \$260 in sales and \$453.39 in milligram tax, for a total taxation of \$713.59, or an effective tax rate of 35.68%. (The rate is higher for value added producers). If the same pound was sold for \$1000, the tax on this would be \$130 in sales and \$453.39 in milligram tax, for a total taxation of \$583.59, or an effective tax rate of 58.36%. This rate seems to be prohibitively high, particularly for small producers, let alone mid to larger operations that have invested heavily and have larger workforces and considerable overheads. I am asking if the OCM would take into consideration in reviewing the milligram tax (the greater of the two) and reducing it to a more equitable level. I look forward to hearing from you on this matter. Sincerely, Timo



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54.	James	Dean	Let's Drink LLC	I think this ruling with negative effect my business, I signed up for this license as a way to offer non alcoholic options to my customers that still want to be social. And the purposed limits and ratios will nullify any effect these products have. Making my license and the investment that I put into these brands worthless. I agree with age limits but I think customers can choose for themselves on what dosage they want to take. Thank you.
55.	Neil	Garfinkel	Niagara Community Survivors	I'm a cancer patient who depends on the new cannabis drinks to sleep and feel comfortable. The medical marijuana is beyond affordability and the new THC /CBD dinks also keep me from drinking alcohol which is very unhealthy and is much more mind altering instead of being calming like the THC drinks . This state is becoming a place to move away from with how you people control everything often for the worse without any first hand knowledge of what you're doing. I know it's not everyone in the state government but it's tough to take when it affects health and livelihood. Thank you for listening and please remember how you let people drink alcohol which is much much more potent and dangerous.
56.	Margarita	Canibus		Please keep non alcoholic seltzers with THC and CBD available to the public. The benefits of these drinks far outweigh any alcoholic beverage available.
57.	michael-ann	rowe	murray hill neighborhood association	Our recent meetings with CB6 show the proposed Cannabis Dispensary for 30 th street, Manhattan, noted they are being pushed by the OCM to get a resolution passed on a location that clearly was overlooked; A quite residential street within 500 feet of a Church, one block away from another church, a library and a school. Yet this location for the shop is on the same street, or within two blocks of schools, on the path for children going to and coming from school. The overall community votes are to look for another more suitable location than on a quiet neighborhood street. Clearly not where you'd want that kind of business.
58.	Laura	Chouinard		Recently, I've begun consuming THC-infused seltzers that I can purchase at a local beer store or brew bar. These seltzers have proven to be incredibly beneficial for my mental, emotional, and physical well-being. Given various reasons, alcohol is not a suitable option for me, and being able to enjoy THC-infused seltzers allows me to feel more comfortable at adult community and public events. As a petite woman who doesn't regularly consume other THC products, I have experienced minimal side effects. However, these seltzers greatly improve my mood, help alleviate anxiety, and most importantly, provide some relief from my chronic pain due to multiple auto immune



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				diseases. They are an affordable way for me to enjoy community outings or relax in the comfort of my own home. As a mother to a disabled child, I rarely have the opportunity to do something nice for myself or prioritize my emotional well-being. These products offer a small way for me to address this need. I kindly request that you don't hinder the accessibility of these products. As an active community member, I take pride in supporting local businesses, consuming responsibly, and advocating for inclusion, education, and equal access to resources. I would be more than willing to discuss this matter in greater detail with any of your board members.
59.	Adam	Terry		Hello- I think it is a mistake to make these changes to the hemp program. Operators have been lawfully following the existing regulations and have created a place of commerce for these products and this will cause irreparable financial harm to those following the law as it was written. By restricting the amount of d9THC in products, you not only harm myriad local businesses but also create a vacuum for intoxicating products that will inevitably be filled by alternative intoxicating cannabinoids that we know very, very little about like HHC, THCP, and other synthetic cannabinoids. Allowing d9THC products to continue as is with existing reasonable caps and restrictions keeps the public safe and reduces the harm caused by synthetic cannabinoids. Please reconsider these emergency regulations in the interest consumer safety
60.	Sean	Sean		I like the products as they are. Please don't pull a typically NYS move and regulate the life out of it. Seriously, please don't shoot yourself in the foot, again. You know the routine: NYState taxes or regs push the activity out of the state and business goes elsewhere. In this case, you make the product suck, and so I have to go and get it -- with annoyance and a pain in the ... -- from another state Please NYS, don't suck.
61.	Dylan	Lowery	Cantrip, Inc	Low-dose thc-hemp products are products that consumers want as they increasingly look for alternatives to alcohol. It has been proven over the last 8 months that beer stores in NYS can responsibly be a key part of the supply chain in selling low-dose thc hemp products. To unilaterally ban these products or place restrictive cannabinoid ratio's and limits on them only continues to help the black market, other states, and bad actors make significant sums of money while individuals who want to responsibly formulate, manufacture, and sell low-dose social and sessionable goods are forced to a broken state and federal framework which we know to be marijuana. The costs are too high and the taxes too great to run a sustainable business model.



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				Low-dose thc products have a place in traditional age-gated retail outlets, access to these products is paramount to creating equity in access and alternatives to harmful products like alcohol. Equity is what the board strives to create, however, by issuing these emergency regulations its showing that locking these products away in highly regulated restrictive channels that are inaccessible by most entrepreneurs and consumers for Cooperate interests is where they are aligned.
62.	Christopher	Lackner	Hemp Beverage Alliance	The Hemp Beverage Alliance recognizes the need to ensure the safety of New York residents, especially children. We would greatly appreciate the opportunity to speak with OCM to discuss how hemp-derived intoxicating beverages can be sold safely in retail establishments throughout the state. Please visit hempbeveragealliance.org to learn more about how the industry is working to make the hemp beverage industry safe, transparent, and sustainable.
63.	Carissa	Monahan	Branching Out Bottle Shop	We own a craft beer store in Camillus, NY. We currently sell Delta Beverage products with 20mg THC and 5 CBD. These products have been life changing for many of our customers who suffer from chronic pain and/or anxiety (and so much more). The fact they can get this product at a local store is crucial! Losing the ability to sell products such as these would demand that they got to a dispensary and those are few and far between. Please consider the responsible users who depend on these products, not just the irresponsible end user. People will abuse anything if they want to. don't let those few bad apples ruin it for the many people who enjoy appropriately. Thank you for your time Carissa Monahan Small Business Owner/Manager Branching Out Bottle Shop 585-261-8775
64.	Matt	Oscamou	Weller	I am speaking in response to the broad range of topics and regulations included in the Cannabinoid Hemp Emergency Regulations. In the document, the proposed regulations appear to be blunt tool that aggressively targets all hemp companies across the state, rather than specifically addressing the bad actors that are marketing high potency synthetic cannabinoids to vulnerable populations. There are many hemp derived beverage companies that are focused on delivering safe, high quality products that have low amounts of THC. These products are not well suited for the dispensary channel due to the economics of a beverage product vs. marijuana flower, vapes, etc. (they are expensive on a \$/mg basis), but they have the unique



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				ability to invite trial by consumers who would likely never visit a dispensary. The result is a reduced stigma around cannabis, and an increase to the size of the regulated MJ market over time. The better approach to an emergency regulation is to cap the potency of hemp derived THC products at 5mg/package, require 21+ age gate, and apply a flat tax to these products at retail. This approach has been accomplished in states like Tennessee.
65.	Michael	Barnes		I wholeheartedly believe this to be an unnecessary measure to take. THC has scientifically proven benefits to those suffering from illnesses, anxiety and a host of other ailments. To push forward with this is to ignore those in need. I implore you to reconsider and take a moment to consider the wealth of positives, vs the perceived negatives.
66.	Stephen	Hilbert	One Stop Brew Shop	These are necessary for small businesses, people without health care that need stress relief, pain relief, farmers that have mouths to feed. To change this bill will be detrimental to individuals across the state and country by eliminating jobs, potential sales for business, and agriculturally. It is a slap in the face to people that got legal licenses for their businesses to sell a product that they believe in.
67.	James	Hilbert	One Stop Brew Shop LLC	Greetings. I am a small business owner for the last 10 years, operating a beverage store who specializes in craft/boutique beverages from all over, focusing mostly on craft beer. But when hemp products became available to us (through the proper licensing), we took it as seriously as alcohol: training our staff on the product, effects, potential hazards, and IDing anyone not of legal age. Changing this legislation will be negative both for the community and a plethora of small businesses across the state. For the last 6 months my business has started carrying Hemp Derived THC products as a way to diversify our portfolio and offer our customers an alcoholic free alternative with lower calories, but has beneficial effects. Needless to say, in a time of economic uncertainty, this diversification has been crucial to our business, allowing us to reach a completely new clientele and supplement the loss of sales in this tough economic climate with the new product. For a small business making changes and diversification is how we can thrive and more importantly survive... Our staff is fully trained on the effects of such Hemp Derived products, knowing fully well what it does to oneself. Their knowledge is used to educate our customers fully on how to handle such a product so they are handled in a safe respectful way. We have countless customers, of all ages, who express the benefit of these products and how much they have helped them with things like anxiety, depression and



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				physical pain. Coming back thanking us for guidance in navigating these products. Changing this law now will have a direct negative impact on not just our business but our customers. I encourage you to reconsider this stance considering how many small businesses and community members this will directly impact. Thank you for your time.
68.	walter	iwachiw	FBNT	<p>Walter Iwachiw RN SPNP SFNP 48 35 41 street Sunnyside, New York 11104 3472390965 Iwachiw2001@yahoo.com July 18,2023 Hon. Kevin R. Bryant Albany County Courthouse , Room 102 16 Eagle Street Albany, New York 12207</p> <p>re: Coalition for access to regulated & safe Cannabis v. New York State Cannabis Control Board, et al , Supreme Court, Albany County index No. 902390/23 Honorable Judge Bryant: We represent the Intervenor's CUARD class of applicants in the above-referenced Action. We are responding herein to the Petitioner's first letter that inferred improperly that consent was secured from the CUARD Class for an extension of time which resulted in a new scheduling order but unfortunately the CUARD Class had already replied to the opposition papers. Today we recovered a letter from the post office that requests the court to allow a verbose Memorandum of law on an expedited basis. The CUARD Class respectfully defers to the Courts discretion on the word limit since it is not within the instant focus of the Court on the merits of the motion to intervene. The CUARD Class does request the court grant an opportunity for the CUARD Class to supplement the already filed reply as it was filed according to the old motion schedule which the court has moved to have the CUARD Class decided on Aug 4, 2023. In brief the CUARD Class holds that the MRTA law's primary focus is to generate Sales and Tax revenue which sadly has not happened in volume. Illegal Competition has risen to the occasion and created over 1500 illegal store operations and untold illegal delivery operations from phone and online and word of mouth operations. The Rules Promulgated by the OCM had the effect of limiting the sales and thus the Tax revenue. It is rumored that some 200 plus additional licenses are to</p>



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				<p>be issued on Wednesday July 20, 2023.</p> <p>I suggest that the OCM immediately authorize all CUARD applicants to begin Legal Delivery operations immediately using the existing CUARD Applicants since the MRTA law was targeted to those penalized for Marijuana. Walter Iwachiw being in the delivery business for 50 years is confident that all 900 stores with 25 employees each can immediately service the existing needs of the Marijuana consumption consumer in NYS</p> <p>I understand the real estate that meets the location of a store criteria, set by the OCM has prevented the approved CUARD licensees from generating Taxes and revenue sufficient to compete against the illegal stores and to secure loans to outfit the stores.</p> <p>I recognize that the role of the OCM to regulate the sale of Legal Marijuana is essential but the prevention of delivery without a storefront is counter productive to the need to satisfy a demand and collect Taxes.</p> <p>I recommend the the OCM abandon the requirements as established and instead assign a OCM employee as Sheppard, to all the applicants, to immediately start delivery of legal marijuana products and act to guide the licensees toward appropriate OCM guidelines and allow for the sales generated to fund Taxes and Fund the expansion of the CUARD licensees toward a profitable business.</p> <p>There have been two Supreme Court decisions that have come down that affect the arguments herein.</p> <p>Affirmative action and the Taking Clause of the Constitution.</p> <p>The intervenor will send a copy of this letter to each party and expects any objections to be responded to in one day as well.</p> <p>The petitioner also entered a late opposition when the court evoked it's intention to deal with the intervenor's motion and the CUARD class needs permission to respond to that late opposition or to strike the late opposition by the petitioner.</p> <p>For all reasons expressed above , we respectfully ask the Court to permit an additional reply to the States opposition and a new reply to the Petitioner's late opposition. Then based on the outcome of the motion to intervene permission to sustain a class action once an attorney is secured.</p> <p>We thank the Court, in advance, for its attention to th</p>
69.	Patrick	Shatzer	Sunflora, Inc dba 'Sunmed Your CBD Store'	<p>My name is Patrick Shatzer and I am the Senior Regulatory Affairs Manager for all Your CBD Store®'s, a wholly-owned subsidiary of Sunflora®, Inc., which is the largest cannabinoid retailer in the United States and the exclusive home of best-in-class, premium quality, award-winning,</p>



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				<p>cannabinoid-derived Sunmed™ products. Your CBD Stores®, are independently owned and operated by local members of the community. We currently have 22 stores located in New York and over 410 stores across 41 states. We at Sunflora care about the wellness and safety of our customers and consumers in general, and as such, only offer products that have been naturally derived from industrial hemp, are full-panel third-party tested, and comply with corresponding Federal and State regulations. I have fully reviewed the proposed Cannabinoid Hemp Emergency Regulations and I strongly urge you to carefully evaluate the possibility of raising the THC threshold both per serving and per container. It is important to acknowledge that the majority of CBD supplements are packaged similarly to other dietary supplements, typically in a 30-day/30-count supply. Therefore, if you currently allow 1mg of THC per serving, it would be logical to permit an increased THC content of up to 30 times the original serving size per container. At present, the existing cap of 10mg of THC per container severely limits CBD products, forcing them to be available only in a 10-day supply. This restriction significantly hampers the market potential and consumer experience. By revising this limitation, you would enable CBD manufacturers to offer products in line with industry standards and consumer demands, resulting in a more diverse and accessible range of options. Moreover, it is worth noting that a recent report from the Colorado Hemp Task Force (https://drive.google.com/file/d/1Kj4_VNIUQsN9ft468iGpIHsMv45PbV1L/view) suggests allowing up to 2.5mg of THC per serving. Taking this recommendation into account would not only harmonize regulations with expert advice but also ensure that consumers have access to CBD products that align with their desired THC thresholds. We have additional studies to support 2.5mg-5mg THC per serving, that we would be glad to share. By considering these proposed adjustments, you would not only support the growth and innovation of the CBD industry but also enhance consumer choice and satisfaction. It is crucial to adapt regulations to reflect current market trends and scientific research, fostering a robust and progressive environment for CBD products. I am available to meet virtually or in-person to discuss the proposed regulations. Best, Patrick.</p>
70.	Daron	Driscoll	Kileys Deli	<p>I feel that my \$2000 was stolen and that the ocm was not clear enough about qualifications for a license we were told that it required two yrs of profitable business ocm never stated a start date or end date for those two yrs . Meaning</p>



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				they never stated if it had to be from January 1 till December 31 to be considered a yr . Even more ocm asked poor people for \$2000 for the application fee as if we could afford to not receive a license like this was an expensive lottery ticket I would of been better off playing \$2000 worth of powerball tickets . Also we should be given a reason why we were not chosen because there is no way for us to know if you chose the best candidates. I feel that all remaining candidates should be allowed first to get regular retail licenses to sell cannabis since our information has been looked at and we just donated a free \$2000 for nothing and we had to wait all this time for nothing I truly feel robbed and taken advantage of , I held up my life for something I wasn't ever gonna get. You just wasted over 600 peoples time and money kept us watching like a carrot on a stick every month for nearly a yr checking emails everyday do you have a clue how nerve racking and disappointing this process has been you could of told us the first month who was gonna be picked but you kept us waiting and watching just to tell us no. I think that's wrong and I want my money back or a regular license. The way this was done made it like another consequence for getting caught with weed just take more from us , you told us if we got caught with weed we had a chance but no you just gave me a \$2000 fine i feel like a real sucka God Bless
71.	Daron	Driscol	Kileys Deli caurd 2022-000121	When do the rest of the regular public get to apply for retail licenses to sell cannabis
72.	Harvey	Epstein	New York State Assembly	My name is Harvey Epstein and I am the Assemblymember representing New York's 74 th Assembly District, which includes the neighborhoods of the Lower East Side, East Village, Stuyvesant Town/Peter Cooper Village, Murray Hill, Tudor City, and the United Nations. Thank you for the opportunity to testify regarding the proliferation of illegal cannabis shops across New York City. As an active cosponsor of the Marijuana Regulation and Taxation Act, I believe that the sale of cannabis should be used as an instrument of social justice, allowing individuals who have suffered the impact of criminalization to enter the market legally and receive priority status when applying for their licenses. However, the proliferation of unlicensed cannabis shops seriously threatens this effort by crowding the market, making it difficult for members of communities historically harmed by marijuana criminalization who own legal cannabis shops to thrive. This community deserves the largest market share and unlicensed cannabis shops perilously undermine that goal. Furthermore, unlicensed cannabis shops are a threat to



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				<p>public health and safety. These cannabis shops are not held to the health and safety requirements that licensed shops must follow. Additionally, illegal cannabis shops evade taxes, driving down state revenue.</p> <p>I have repeatedly called on the Office of Cannabis Management (OCM) to close down 18 illegal cannabis dispensaries in my district. These include:</p> <ul style="list-style-type: none"> Beer and Cigars (206 Ave B) Convenience and Smoke (208 Ave A) Dispensary (271 1st Ave) Kush Factory (422 E 9th St) La Fleur Cafe (437 E 9th St) Magic Buff Dispensary (250 3rd Ave) Puff and Puff Convenience (153 Avenue C) Puffy's Smoke Shop (175 3rd Ave) Recreational Cannabis Dispensary (180 1st Ave) Smileys (199 Ave A) Smoke City Exotic (166 Ave B) Smoke Shop (313 1st Ave) Smoke Shop (89 Ave A) Smoke and Beer (near 221 Ave A) The Greenery Arts by Dr. Green (424 East 9th Street) The Tree Shop (413 E 14th St) Top 1 Convenience (158 1st Ave) Villager Smoke Shop (E 9th St & Ave A) <p>Additionally, we have compiled a list of 35 unlicensed establishments in our community that are known to be selling illegal cannabis products:</p> <ul style="list-style-type: none"> 199 Smoke Shop (199 E 3rd St.) Buff and Brew (168 Ludlow St.) C.R.E.A.M. Smoke Shop (251 Elizabeth St.) Cali Plug (163 Orchard St.) Cigar and Smoke Shop (279 E Houston St) Dispensary (162 1st Ave) East Village Exotics (53 Ave B) Empire Smoke Shop (57 1st Ave) Essa Deli (66 E Ave C) First Ave Truffle Tree (213 1st Ave) Galactic Smokers (221 East 10th St.) Giggles Convenience (59 1st Ave) Green Apple Cannabis Club (95 Allen St.) Green Dispensary (162 E 10th St) Higher Empire (71 1st Ave) Kushi Factory (422 E 9th St.) LA Convenience (103 Ave A) Mamba (188 Orchard St.) Manhattan Smoke Shop (91 E 1st St.) NY Village Convenience (45 1st Ave)



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				<p>Pride Smokers (331 East 9th St.) Puff and Pass (50 2nd Ave) Runtz (14 1st Ave) Smart Smokers (143 1st Ave) Smoke Shop Allen Convenient Exotic (99 Allen St.) Smoke Vape (45 Ave B) Smokeland (192 Orchard St.) Smoker's Basement (93 1st Ave) Social Club (66 Allen St.) Sogie Mart Rolls & Puff (24 Avenue A) Sweet and Sour Smoke (73 2nd Ave) The Goodies Shop (324 Bowery) The Green Room (314 East 9th St) Traffic Social Club (147 Orchard St.) Zee Convenience and Smoke (208 Ave A)</p> <p>Despite providing this extensive amount of information, we have been told repeatedly by OCM that their office is too small and they cannot guarantee that these establishments will be looked into. This has created a predicament in which there is no transparency or accountability between OCM and the public.</p>
73.	Harvey	Epstein	New York State Assembly	<p>I would also like to raise an additional concern related to the potential licensure of Smiley Exotics, an applicant seeking a license to operate a temporary delivery-only location at 201 E. 30th St, which appears to be less than 450 ft. from the Epiphany School, in violation of the cannabis law. My office brought this to OCM's attention over two months ago and we still have yet to receive a response. I am disappointed with the lack of enforcement efforts, transparency, communication, and accountability that have plagued this rollout. We worked diligently in the state budget to provide additional funding and authority to OCM to enable better enforcement efforts. Today, I call on you to close these illegal shops, ramp up enforcement efforts, and provide more transparent communication with New Yorkers. In addition, my office reached out to testify at this hearing and my staff was not even given the courtesy of being told when the public session was being held at today's meeting. This issue was not resolved until I personally got involved. That is not an appropriate way to deal with elected officials or the public at large. You should have your agenda posted a week before the meeting so that the public can plan to attend at the appropriate time. Thank you.</p>
74.	William	Smith		<p>Absolutely disagree with changing anything to do with the THC seltzer's. It helps combat alcoholism and over use of medications. They are much more mild than edibles found at pot shops.</p>



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75.	Troy	F.		You need to allow THC beverages, foods, and gummies. As long as the company has Lab Tested Data, then let adults make it their own choice.
76.	Steve	Matthews		For those of us who choose to abstain from drinking alcohol, these are an excellent way to relax and enjoy a social night out. Please reconsider over complicating the process to obtain these items.
77.	Jeff	Jones	Birch & Bloom LLC	Dear Ladies + Gentlemen of the Cannabis Control Board, I come in peace and aligned in service to this amazing plant and to co-creating the best possible social + environmental + economic outcomes for cannabis in the state of New York. Please find attached a draft letter outlining my concerns re: Structural Barriers to Microenterprise Development in NY Cannabis. This is currently in draft form to work out some of these ideas, and to build consensus with others in the community around a few key points and potential solutions. This has not yet been informed by thinking from each of you, and would benefit from it! I see the challenge of the NY Cannabis Roll Out as primarily a micro + very small enterprise development challenge (with a splash of ensuring large corporations don't swallow the market whole right out of the gate). This is a nearly impossible task: to move thousands if not tens of thousands of heretofore cottage-level, fairly informal microenterprises successfully into one of the most insane, structurally unsound ecosystems for small enterprise development -- an ecosystem in which small enterprises have Unequal Access to the Mainstream Capital Markets and Unique + Unnecessarily High Costs of Doing Business. These concerns alone will conspire to sink many a small cannabis enterprise, and when we add in the fact that The State is about to subject these enterprises to the massive Over Supply and Cash Flow is King economics of the major cannabis corporations, it starts to look downright immoral. If these concerns are not addressed, the cannabis business development outcomes for New York are going to be massively limited. We do not want New York to follow the broken "Business as Usual" model of economic development—one that relies on large, out-of-state corporations and massive development (see the Gigafactory in Buffalo). Instead, we want a "Next Economy" model of economic development: a model that is open, accessible, and diverse + inclusive; a model that not only protects the environment and the informal economies and legacy communities heretofore supported by cannabis, but that also sets the standard for leveraging the awesome power of cannabis to drive regenerative economic development, environmental restoration, and climate



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				<p>resiliency across New York State, and with NY's great influence, around the world. As my comments at last month's Cannabis Control Board meeting and my recent article in the Tompkins Weekly suggest, I am passionate about the power of cannabis to make a real difference in some of the most intractable issues of our time: economic inequality, climate change, and social justice. I know that the State and many over at the OCM share this vision and are making real strides towards building a program that has the possibility of achieving these goals. I believe strongly, however, that this will only ever be achieved if a vast number of small businesses (mostly very small/micro), small farms (especially those using beyond organic practices), and "next economy" enterprises (especially co-operatives/collectives) are operating successfully in the cannabis economy across all facets of the supply chain. I have been encouraged by the progressive intention and initial actions of New York, and I am continually impressed by the OCM staff who I have met personally, and in general by the diversity of folks and viewpoints that have been assembled at the OCM. I am also having a very different set of conversations here in New York than I was able to have 7 years ago in California. First off, the regulated are able to speak to the regulators -- that is huge and CA is just now winning part of this victory. I am also having serious conversations with local governments (Mayor of Montour Falls, Enfield Town Board), economic development agencies (Southern Tier Economic Growth, Watkins Glen Chamber of Commerce), academia (Cornell, Syracuse University, SUNY... (cont'd)</p>
78.	Jeff	Jones	Birch & Bloom LLC	<p>(cont'd) ...SUNY), and community organizations (Cornell Cooperative Extension, Challenge Industries) about how to harness the power of cannabis to produce undeniably awesome social + environmental + economic outcomes across New York. We have so many of the pieces in place here in NY to make it happen. If we can't do it here and now with this amazing, committed group of people, where can we do it? I would like to help however I can. I have a background in nonprofit work, primarily microenterprise development and microfinance, but also mentoring and workforce development. I have worked for the Aspen Institute and Mercy Corps. I co-created and led the MicroMentor.org program, which is still in use today by Empire State Development, powering the Business Mentor NY program. I was the inaugural Operations Manager for one of the first cannabis ag co-ops in California. I launched a brand in CA, PremaFlora, that focused on sourcing from small, regenerative, diverse farms and celebrating cannabis</p>



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				<p>like we do fine wine, or coffee, or chocolate. I did this all while managing a network of traditional market farms and participating on all sides of that underground economy as well. So there you have it. If you've read this far, thank you for wading through. Again, please see my attached draft letter outlining some of these concerns.</p> <p>I would love the opportunity to meet with each one of you and your teams, in-person or virtually, and I am happy to travel to you. Let's find a way to get cannabis blooming here in New York!</p> <p>All my love, Jeff Jeff Jones Chief Pot Farmer, Birch & Bloom LLC birchandbloomllc@gmail.com 415-692-4840 thelastpotfarm.com @thelastpotfarm {NOTE: please contact me for referenced attachments -- thanks!}</p>
79.	Samantha	Smith		<p>Marijuana should remain legal in its current form. This is stupid. Marijuana is safer than alcohol, and less damaging in every way. Stop making stupid laws and focus on actual important things.</p>
80.	sal	yadgar		<p>When will the open market be able to apply for a recreational dispensary license? Is there a date certain?</p>
81.	Pamela	Epstein		<p>This comment is in support of the Emergency Justification 9 NYCRR Part 114. It is undeniable that the proposed emergency regulations are essential for advancing public health and safety. An area of concern is that hemp products containing THC, often exceeding the maximum allowed potencies in regulated marijuana, are landing in the hands of unaware adults and children. As the Office of Cannabis Management (OCM) considers emergency regulation to curtail the quantity of intoxicating cannabinoids in hemp products, it is paramount that these restrictions are tailored to specific product types, taking into account the method of consumption and packaging and serving sizes. For instance, edible products such as gummy bears are susceptible to accidental overconsumption by both adults and children. In fact, consumer packaged goods (CPG) industries have conditioned consumers to overindulge; it's rare for consumers to limit themselves to a single serving of sweets or cookies. Eating a handful of candy is seen as normal behavior. However, unlike other consumption methods such as beverages or topicals, edibles are metabolized through the digestive system, which can lead to a potent</p>



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				high that takes effect 60 to 90 minutes after consumption. This delayed onset may lead consumers to consume more than is safe or intended, thinking they should increase their intake due to the lack of immediate effects. This indicates that edible products should have stricter caps on their THC content, and the limit on the package size should be less than the standard micro-dose in the regulated space such as 2mg, a standard that has been adopted by other states. On the other hand, beverages, due to their faster onset, should be regulated relative to the product container size no smaller than 6oz and the container is also the serving size. It's crucial to understand that these two product types—edibles and beverages—should be subject to different regulations due to their unique consumption methods. A consumer might easily consume 5 - 10 gummies at once, but it would take significantly more time to consume the same number of beverages. The consumption timing allows for the consumer to experience the effect and control their intake. Moreover, it's important to note that there's no academic peer-reviewed evidence supporting the notion that a specific CBD to THC ratio can mitigate the intoxicating effects of THC on the consumer. In fact, some studies suggest this ratio has no impact at all. Thus, a CBD to THC ratio does not necessarily promote safety or reduce intoxicating impacts. If the objective is to safeguard public health, we must enforce stringent total THC caps specific to the type of product consumed, especially in the case of edibles irrespective of CBD to THC ratios.
82.	Robert	Grannis		Thank you for the opportunity to be a part of this!
83.	Chris	Cameron	Adirondack Natural Cannabis	Will the cannabis be retested now that so much time has passed in storage? How long from when Licensee hands in application to point when farmers market may open ? Please estimate days to process application, estimate and describe any further application curing processes and total number of OCM staff allocated to handling approval process
84.	Newt	Paul		With 20 open dispensaries and 68 (or more) conditionally or provisionally approved, can you please share what is causing delays for the 48 conditionally/provisionally approved from opening dispensaries? Is it funding? Locations not allowing dispensaries? etc. Thank you
85.	Richard	Steamer	640 Pittsford-victor llc	Please leave delta 9 the way it is. Do not change!
86.	Jeffrey	Roizman		Can a schedule for the rest of the Cannabis Control Board meetings through maybe January be posted to the OCM website? I would also love to see launchpads established where prospective future Cannabis business owners can



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				go to for resources and education about the New York and wider Cannabis industry.
87.	Jamie	DeFazio		Alcohol is more dangerous than marijuana/cbd infused beverages. These products should not be more regulated than alcohol, it should be equal/similar regulations.
88.	Eric	Postow		<p>Cannabis Sativa-L is a complex plant with various distinctions that require careful consideration in our regulatory policies. The current challenge arises from the disparities between federal scheduling under the Controlled Substances Act (CSA) and the differing state laws governing medicinal, adult-use recreational, and industrial hemp programs. Although the 2018 Farm Bill attempted to differentiate "hemp" from "marijuana," it did so arbitrarily, as these terms ultimately refer to the same plant, regardless of how we define them.</p> <p>To that end, we propose the following recommendations for regulating Hemp derived products:</p> <ol style="list-style-type: none"> 1. Regulate hemp products within the established licensing framework to ensure that all hemp products sold in New York adhere to specific state standards. This approach will promote a licensed and regulated marketplace while mitigating the prevalence of unregulated products. 2. Enforce clear testing and labeling requirements that empower consumers to make informed choices without imposing unnecessary burdens on product manufacturers that serve no purpose. 3. Implement reasonable limits on milligrams per package to establish a sensible range. Nationally, the hemp-derived product market typically caps at 10 mg. Products exceeding this limit are better suited for the regulated cannabis market, which caters to consumers seeking higher concentrations. 4. Determine the appropriate age for hemp consumption, drawing insights from analogous regulations governing cigarettes or alcohol. Regardless of the chosen approach, it is crucial to establish clear guidelines to restrict underage consumption. 5. Develop rational branding and advertising policies that discourage the targeting of underage consumers, thus ensuring responsible marketing practices. <p>The reality is that until we achieve a unified regulatory framework for all cannabis-related products, we are compelled to recognize the distinction within the plant. Lower-dose hemp products serve a vital purpose in the market by catering to consumers who seek alternatives to higher-dose options commonly found in regulated marijuana stores and dispensaries. Customers frequenting these establishments typically have different preferences</p>



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				than those seeking hemp products, which are often available in grocery chains and similar retail settings. These individuals are searching for a safer substitute to alcohol, enabling them to enjoy a product with a reduced level of intoxication. It is imperative that our regulations acknowledge and accommodate the needs of these consumers, just as we do for those who prefer alcohol, cigarettes, or higher-potency cannabis products. By implementing intelligent and sensible regulations that prioritize consumer safety while facilitating the existence of this market, we can promote the well-being of both consumers and businesses in New York.
89.	Al	Wunder		Requesting that you consider allowing Delta 9 Seltzers with 5mg or less of THC to be allowed for sale in the state of NY. This product is very light and does not compete with a low number of state dispensaries in NY. There are thousands of businesses in the state that will thrive with the sale of these products. Do not cut off your nose to spite your face in this matter!
90.	Anthony	Squillante	Lickety Splifs LLC	The OCM needs to take Veterans as prime candidates for all OCM licenses. What is being done to help our veterans and mostly disabled veterans and disabled veteran owned businesses?
91.	MIRIEL	BEREAL	LAV8 Corporation	Great morning, with ALL glory and honor to GOD. I have been emailing and contacting the Dept and Council regarding approving my application for a dispensary. OCM says that the application was rejected as my 'justice involved' co-applicant never actually did any time, though he was arrested and charged for cannabis possession MANY times. They claim that since he was able to get an attorney or work deals to avoid prison he does not 'qualify' for a dispensary. It seems we are missing the point of what SOCIAL EQUITY is and leaving out those who should be counted in. You cannot replace the time that was taken from him when he was in jail, or harassed by NY police, or looked over his shoulder, or even had PTSD from these experiences, while you all turn and award others who do NOT deserve more licenses. Please look at our application again, and approve it. Application number 587. There are three of us on the application, and each person is Social Equity, with two of us being verified social equity within other Jurisdictions.
92.	Miriel	Bereal	LAV8 Corporation	Please approve license number 587! We were told that we did 'not meet the eligibility requirements and the application will be presented to the board for a determination at a later date' on May 10 th by OCM. We are now in July and have been waiting close to a YEAR for this license. We paid our fees, did what was asked of us, to only be told, those who



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				are Social Equity, do not qualify. Please approve this application, as each and every applicant on this application IS social equity! We are not big corporations coming to take over the market. We are black women and men, who have been harmed by this war on drugs, looking to trust government and step into the legal market... once again.
93.	Margaret	Mikol	Tree Hill Innovations	The MRTA passage 2 years and 4 months ago gave hope to many friends of the flower, believing that they would be able to enter the cannabis recreational market legally. A lot of work has been done by the Office of Cannabis Management, but it is geared toward specific interest groups. The revised Regulations provide legal integrated pathways for hemp growers and medical cannabis conglomerate to corner the market and secure relationships with dispensaries as no other growers are allowed to compete because cultivators applications are being held up. Two years ago I founded a company, as a women owned business, to legally grow adult-use recreational cannabis. We bought land and we have been waiting and waiting for applications to become available. There is no end in sight. This was not the MRTA's intent. Many entrepreneurs and small businesses were supposed to enter the market. Former hemp cultivators have hundreds of acres and medical cannabis conglomerates have easy access to capital. They were granted a monopoly from cultivation to processing to selling. Regulations for cultivator licenses application need to open without further delays to ensure a fair 2024 growing season. The status quo is also encouraging the legacy market. Legacy cultivators cannot sell their products to legal dispensaries and will continue to support the illicit market. Rumors over the past two years indicated that cultivators' applications would be "available in September". I urge you to open applications before September 2023 and give a fair chance to New York small businesses to flourish before another growing season passes.
94.	Haz	Aliessa		My name is Hazm Aliessa, I am CAURD applicant # OCMCAURD-2022-000475 that is recommended for approval in today's July 19th meeting. It is an absolute honor and privilege to be involved in NY's adult-use cannabis industry. Thank you for this opportunity. Thank you for making NY a fair and safe place for me to pursue the business of my dreams - a cannabis dispensary and lounge. As a true-blue New Yorker born and raised in the East Village, I respectfully request that the OCM permit me to set up my shop in the borough that gives my future business the highest chance of success. I own a small boutique real estate brokerage firm in the city, have family



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				and friends with access to properties in Manhattan, and lived my entire life in the neighborhood I grew up in. It would be an ideal situation if I can serve my family, my friends, and my community. I would love to be the Ted Danson (Cheer's reference) equivalent, but to cannabis. I am grateful to the OCM and CCB for making available a Fund for CAURD applicants. However, in the event I am granted a provisional license, I may choose to opt out of the Fund benefits and attempt to secure a property on my own. I am still debating whether not to opt in or out. If I do decide to opt out, I respectfully request the OCM and DASNY to streamline approvals for compliant properties and permitting in general. Thank you again for this opportunity, and I look forward to helping NY be the model for adult-use cannabis and social equity programs throughout the nation.
95.	Sara	Urena		Regarding adult use retail licensing, I would ask the committee to consider locations of than than dispensary for beverage and comestible options. Bottle shops and other related services to be able to have a limited product option.
96.	Brittney	Wolfran		The emergency rules being put into place are immediately making hemp business owners into cannabis criminals. This re criminalizing of cannabis is against the spirit of the MRTA and directly goes against what federally is considered a hemp product, as well as what is a hemp product under the current criminal code of NY.
97.	Fred	Ruckel	OK to Grow	I attended the CCTM program, all courses, and also have 2 years of Hemp Farming, with all submitted reports of compliance. Will my status as a successful Hemp Farmer allow me to transition to and AUCC license? When will the micro license be available?
98.	Jillian	Xavier	DREGLO LLC	Discrimination against those who were locked up and no convictions lawsuits
99.	Eric	Faulkner		Please do not destroy our jobs by passing legislation that will eliminate products from everyday mom and pop shops. This will negatively impact many businesses and cause many jobs to be lost. Why even issue licenses if you're going to negate the actual sales of products that consumers want?
100.	Jason	Coello		What license pathways are being made out for service disabled combat veterans?
101.	Andrew	Blanchet	Crisafulli Beverage Group	Changing serving size to an incredibly strict 15:1 ratio with CBD/THC will completely kill this segment of the market overnight. Our company has worked very hard over the past months building inventory/ educating customers/ and navigating constantly changing laws. This new ratio change would encourage consumers to ingest very high and unsafe levels of CBD. Also at the same time, there are zero



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				products available that would fit this requirement. Please do not take this proposed action, it will negatively effect hundreds if not thousands of hard working New Yorkers. Thank you.
102.	Jeremy	Irving		I don't understand why we would limit something that's federally legal and change the landscape. It would make the hemp retailer license essentially useless and if I was a retailer selling current products like Cycling Frog I would want a refund. Dispensaries cannot get proper products bc of the current pack of distribution laws. NY has done this entire roll out backwards and needs people who understand business and Distribution and retail channels to get involved or follow better models from other states.
103.	nick	gaiti		when will non justice involved individuals be able to apply? i have helped many caurd license holders already as an accountant and i want to get a license of my own. i am 25 and i went to college instead of getting it trouble with marijuana. i want to work in this industry but nys leaves me no choice but to wait on the sidelines. i understand the social equity initiative but i hope i can apply soon. regards, nick ngaiti@tjmcpcas.com
104.	John	Goitia		When will the OCM start applications for consumer marijuana licenses? Why is favoritism shown when it comes to applying for a dispensary license? Ofcourse your going to state that your not but this is America, land of opportunity not land of those who you think should get licenses. This is supposed to be the greatest city in the world yet when someone is trying to make something of their lives why is it you restrict them from achieving this? Everyone should be given an opportunity to create a business.
105.	Scott	Eggiman		I respectfully request that the CCB NOT change regulations which would cause the sale of Delta-9 products to be illegal if it's over a 15:1 ratio of CBD to THC. Such a change would make those products have little to no effect on things like relief from pain, inflammation, anxiety, depression, and even insomnia. Additionally, these products are known to provide a sense of relaxation, which can help to reduce stress and improve overall well-being. Thank you.
106.	Lisa	Barone	Farmer Bettye CO-OP/The Herbal Confectionery/Windfall Farms	Hello my name is Lisa Barone, part owner and operator of Windfall Farms a 142 acre regenerative farm in Hudson Valley which is home to multiple farmers including AUCCs, The Herbal Confectionery a legacy edible company since 2016, first round completion of the CCTM program and hopeful future adult Use Coop license holder with our cooperative Farmer Bettye. This is a comment on entering



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				cannabis cultivation specifically into farmers markets. Which is not outlined in the Cannabis Growers Showcase Initiative, but should be placed into a specified category of this Initiative. My goal is simple, cannabis cultivation farmers should have the full Right to Retail in a farmers market. As a professional in the agricultural, culinary and cannabis industries I feel strongly a slow and consistent rollout of this can allow for long term success. Allowing cannabis farmers a safe space to develop their products while simultaneously being able to provide their consumers with direct access. Farmers markets were created for a very specific reason and to this day many continue to uphold these values. These values include that a consumer has direct access to the farmer, which allows a deeper understanding of the product being sold and fosters an environment for customer loyalty. The second is that a farmer has the direct and sole access to the retail price for their products. Many small farmers across this state rely on this business model for their farms, which provides the ability for a sustainable income that actually covers the expanding cost of agricultural operations. I believe this starts with an advisory board comprised of Cultivators, Farmers, Market Coordinators and Community Members. Along with a planned, non media flooded rollout of this in smaller towns where farmers markets are predominantly a direct community based consumer. Farmer Bettye Coop has formulated a plan of action to create this infrastructure, and execute this initiative. We hope to be a driving force in the inclusion of cannabis in farmers markets in a way that is safe and sustainable not only for the cannabis industry but also for the existing and flourishing farmers market industries.
107.	Sean	Rieber	BBSR Operating LLC d/b/a Brew	Thank you for considering our restaurant's feedback. A few months ago we applied, paid for, and received a license to sell THC/CBD infused drinks inside our establishment. Since that time we have invested significant sums into inventory for these products. They have proven to be very popular and we have had no negative customer feedback nor any negative incidents from customers consuming them. Inside our establishment, Brew in Rock Hill, NY, we carry a full variety of these drinks ranging from 3mg to 20 mg. We ONLY serve people who are 21 and over, follow all rules, collect and remit all necessary taxes. We have implemented an additional policy, not required in the law, of only selling the 20mg Delta 9 Water as a "to-go" product to reduce any risk of incident inside of our establishment and as to not allow people to drive after drinking one. Likewise, for our 10mg product, customers are limited to consuming



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				<p>just one on-premise. These products have proven to be a very successful addition to our offerings and we sell a good amount as a "to-go" product for people to consume and enjoy at home and have had absolutely zero negative feedback or consequence. In our opinion, responsible businesses, under the proposed changes, will be punished due to the reckless behavior related to what we believe are the market for very highly concentrated edibles that are also labeled and designed to market to young people. We view this as a grossly irresponsible action and agree wholeheartedly that the state should strongly regulate, and/or ban, those products. If I may add, as someone with over 20 years of experience in the restaurant/bar business as well as being a first responder, the effects of alcohol have a far worse effect on people than these drinks. In addition, alcohol related incidents have proven to be far more violent and cause more damage than any cannabis related incident, whether it be fights, domestic abuse, car accidents, etc. Yet, the state allows 100-151 proof liquors to be consumed and 8-15% ABV beers to be sold and consumed. The state does this because they license establishments who responsibly serve these products. As a restaurant owner, I would respectfully ask the state to give us the same respect in serving these products as we have been given for serving alcohol for over 100 years. We do it safely and responsibly every day. Limiting these drinks to a maximum of 1mg of THC, as I've been told is being proposed, is essentially the equivalent to forcing restaurants and bars to sell beers with less alcohol than a basic domestic light beer. The simple fact is that nobody would bother buying them. In conclusion, myself and hundreds of other restaurants and bars have invested thousands of dollars in licensing, inventory, marketing and employee training and have played by the rules. NYS has legalized/decriminalized marijuana to the point where people are openly smoking joints right outside of the door of a restaurant with no consequence. As a response, the state is now looking to remove the ability of those same restaurants to sell a product for on-premise, safe and responsible consumption that has less THC than the joint the state allows to be smoked outside the door or anywhere on the street. On its face this seems completely ridiculous. Please impose regulations and bans where they belong. High concentrated edibles which are designed and labeled to appeal to underage people that can do real damage. Infused seltzers and drinks with 3-20mg of THC do not fall in that category. Thank you very much for the time to give some input. Hopefully this ruling is delayed</p>



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				and more thought put into it. Sean Rieber Brew Rock Hill
108.	Phil	McFarland		I think the new rules around hemp-derived cannabinoids are unduly broad and wipe out a safe, exciting new segment for retailers and for consumers. Looking at the model of Minnesota, there is a way this can be managed safely and responsibly while allowing growth and opportunities. The path chosen in these new rules is off the mark.
109.	Brad	Bevens	Kush.com	The change in the law that is being made is ignoring the community demand for safe hemp products and effectively eliminates 90% of the retail revenue and the potential tax revenue for a state that has been bleeding tax \$\$! It makes no sense to kill a safe viable tax and industry revenue source. You are killing our business.
110.	Jake	Kuczeruk	Tenacious Labs Manufacturing	These proposed regulations are far too scant in detail to achieve their mission. As an operator based in the Colorado market (also heavily regulated), NYC runs the risk of further confusing/misleading consumers and creating even more loopholes for shady operators to exploit. This includes everything from info on Safe Harbor manufacturing provisions to defining synthetic vs semi-synthetic cannabinoids (this is critical for safety). Instead of a thriving regulated market, a la Minnesota, these changes are guaranteed to boost an untested/unregulated black market.
111.	Heather	Fregeau	Nano Technology Infusions, LLC	Our business model has safety and education at the forefront. Our proposed beverages would contain 2mg or 5mg of hemp-derived D-9 THC per can. This mg level is more than compliant with the 2018 Farm Bill that limits hemp-derived D-9 THC to 0.3mg by dry weight. Not sure how citing these beverages as a public health and safety concern is even remotely valid.
112.	Warren	Congdon	Greenwood Lake Garden Center LLC	Please reconsider the extremely low limits on THC products available in NYS as per recent "emergency regulations". I purchased a Hemp license strictly to sell THC infused seltzers to adults looking for an alternative to alcohol. I have never sold to anyone under 21 years of age, and have sold to every type of adult in NYS. We have never has any issues with intoxication, or over serving these drinks. People visiting our establishment and everyone in NYS deserve a option other than drinking alcohol. The low CBD/THC ratio will destroy a new and thriving industry that gives a much safer and healthy alternative to alcohol. Please properly label products Absolutely limit these products to 21+ adults. I am ok with limits on products, however the new proposed limits are unreasonable. 10-20 MGs per serving is a



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				reasonable max for products, however the lack of comparative limits on alcohol is disturbing . Anything lower will stop the industry, hurt my and many other businesses in NYS in a time where we need all the help we can get. Thank You for your time. If you would like to chat further my name is Warren Congdon My wife and I are the owners of the Greenwood Lake Garden Center. I can be reached day or night at 845-987-0596
113.	Mike	Donovan		Hi, I've been drinking Delta 9 seltzers purchased from licensed retailers the last few months. I am 46 years old and have really enjoyed these as an alternative to alcohol and to help with my chronic sleep issues. I understand limiting the hemp derived products that are insanely high like edibles I've seen being sold in illegal shops of 50-1000mg, that do look like candy one would buy off the shelf. These seltzers, however come with proper warning labels and packaging that is not confusing. I understand creating rules for labeling so it is clear what is being purchased, and enforcing 21+ for these, but please do not destroy this category of Beverage by making it so low of a limit that there are almost no effects from the delta 9 THC. We should be able to purchase these in different strengths as adults with proper regulation like alcohol. Thank you.
114.	Nicole	Smith		There is no logic behind changing the law on the THC products when the state has put tax payer dollars to support these business in our communities. There is no reported cases these products have harmed the public or anyone in these communities due to consumption to back up this change unlike many other products that are regulated with less restrictions. This change is solely being considered to benefit the state and based off politics then actual logical reasons. NYS continues to fail our communities and business for their own personal gain but glorify the grant money until it's then used against them and taken away.
115.	James	Morrill	Delmar Beverage	I oppose any action to impede the currently legal production and sale of non alcoholic seltzers and gummies with Hemp derived THC (Delta-9) and CBD. These items are federally legal and provide the over 21 public with healthy sources of these items that many rely upon to sleep and/or for greatly improved sleep. In addition, reputable retailers who pursued and paid for Hemp licenses did so expecting these products to remain legal for them to sell. OCM would face class actions requiring fee refunds, compensation for any currently legal inventory made illegal by regulatory changes, attorneys' fees, court costs, and appropriate apologies from OCM for its failures of due diligence and irresponsible disruptions to lawful, tax paying



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				NYS businesses. These regulation changes will only impact reputable, licensed retailers, while gas stations, bodegas and smoke shops will ignore them and keep on selling. Since enforcement against such retailers will be necessary, I respectfully suggest implementing enforcement under current regulations instead of making changes, damaging licensed retailers and still needing to ramp up enforcement. The proposed regulatory changes are not necessary.
116.	Christy	Houghtaling		The legal sale of this has not caused any negative effects of our community so why would you change it now.
117.	Jay	Rodgers	Pizza Wizard LLC	I own a business and am licensed to sell products with hemp derived thc per my license. I don't see any difference between selling these thc seltzers or alcoholic seltzers. I sell seltzers with 5 mg of thc. The effects of these are milder than a lot of beers/cocktails/hard seltzers that are commercially available. I do not believe these products should be discontinued or recalled from the distributors or business that are selling them. Being able to offer a product for customers that consume containing no alcohol is a big draw for me and my businesses and I do not want this licensing to change. Thank you.
118.	Deb	Herry		Sale of THC and CBD seltzers should remain at the levels they are... examples. 5thc to 20 cbd, 3 thc to 10 cbd. They have warnings... these are not any worse than alcohol consumption and a person has to be 21 to purchase. Alcohol can get in the hands of children more readily than thc products.
119.	Lauren	Santell		No comments submitted.
120.	Rachel	Quatro		No comments submitted.
121.	CJ	Dr. Segal-Isaacson	Growing Renaissance LLC (AUCC #236) for both Cannabis Farmers Alliance and CANY	<p>CJ Comments For 7-19-23 CCB Meeting, Harlem NY Introduction</p> <p>Good morning. My name is Dr. CJ Segal-Isaacson. I am a cannabis farmer – AUCC #236 and a semi-retired medical scientist. I was on the faculty of the Albert Einstein College of Medicine for 25 years where I performed clinical research and taught medical students. I became fascinated with the therapeutic possibilities of cannabinoids through my son-in-law and through that first a CBD farmer and now a cannabis farmer. I am a proud member of the Cannabis Farmers Association, CANY, and the Farm Bureau. Our farm is a small family farm and, like many, we worry that there will not an adequate market this fall to sell our crop. I would like to address two topics: The extreme importance of delaying the entry of the Registered Organizations (ROs) into the recreational market and the Growers' Showcase. Delaying The Entry of the ROs into the Recreational Market</p> <p>We are very concerned that the large canopy size and the</p>



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				<p>long-established infrastructure of the ROs create unfair competition to small farmers like ourselves who need the three years we were promised to become established in a marketplace that itself needs more time to become established. Despite the ROs relatively small numbers, they will wield enormous economic power. It is also reasonable to place a smaller cap on the amount of recreational canopy ROs are allowed to grow given that conditional cultivators have a small cap on their allowed canopy size and will continue to have a small cap when they transition to full licenses next year.</p> <p>The Importance of the Growers' Showcase As small farmers, our prospects for selling our crops from both last year and this fall are tremendously brighter if we can partner with dispensary owners, municipalities and event organizers to sell legal cannabis products to adults in a wide variety of venues. This is a win-win for all concerned: New York State will receive greater tax revenue from legal cannabis businesses, municipalities will see an increase in commerce, and event planners will earn additional money from cannabis booth fees. Most importantly, it creates a viable non-brick and mortar pathway for both cultivators and dispensary licensees to sell legal cannabis products which gives us time to become more established while maintaining New York's two-tier system. Thank you for allowing me to present my comments this morning.</p>
122.	Matt	Sawyer		I am not sure what the state is looking to accomplish with this ruling. This is a step backwards in my opinion.
123.	T	S		<p>NYS CCB - it makes zero sense to remove or no longer allow brew shops to sell hemp/cannabis drinks at their establishments. These folks are knowledgeable about the product, and can ensure only those over 21 are purchasing. These types of beverages are already regulated appropriately- they advertise ingredients, clearly state the amount of THC or CBD right on the front of that can, are sold in smaller quantities, and are likely being consumed more responsibly than alcohol is. Quit taking \$ away from small businesses when the goal was to ENSURE small business owners would actually see profits from selling these types of products. As a consumer of alcohol, it's nice to have an alternative in the same location. I don't want to have to make a separate trip to a smoke shop to pick up a pack of CBD/Hemp beverages. Alcohol will forever be more dangerous than these types of drinks. Overall as a consumer and a resident of NYS, the regulation on weed being legal has been atrocious. You all took years to see how the other states did it with</p>



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				expectations to do it better, and I have yet to see that. All I see is red tape, sloppy communications about these types of decisions, and taking money away from small business owners, particularly those of color. If you can't let people sell the product, then make up your mind on the product itself.
124.	Dan	B	Hammondspott Grocery	The proposed restrictions and reasons make little to no sense. The products that will be affected are already subject to age restrictions to prevent adolescents from acquiring them. As far as dosage per consumable, no such restriction exists on alcohol. These regulations only serve to hinder small businesses that are attempting to abide by the laws. The OCM would be better off enforcing it's current legislation and preventing non licensed sellers from selling untested products.
125.	Jeff	O'Neil	Industrial Arts Brewing Co.	As a prominent New York Craft Brewer navigating a challenging economic landscape who is also an applicant with a pending "Cannabinoid Hemp Processor-Manufacturing Only" license application, I am dismayed by the drastic new proposals to change/limit the permissible amounts of hemp-derived Delta-9 THC in ingestible products in New York. We've spent tens of thousands of dollars on R&D and in preparing our facility for a cGMP audit in anticipation of receiving this license and launching a portfolio of New York-farmed and produced Adult beverages which feature D-9 THC and other cannabinoids. While we concur with the OCM that many of the products currently for sale in NY contain quantities of D-9 THC that exceed reasonable limits and may be marketed inappropriately, we also respectfully and strongly disagree that the remedies need to be as restrictive as proposed. Neighboring states such as Connecticut have successfully established a more reasonable 5mg limit per serving on D-9 THC, which we feel is consistent with the definition of "low dosage." Further, and contrary to a statement made on the OCM Cannabinoid Hemp Consumers website regarding this "emergency regulation package," New York's regulatory framework already has significant and effective safeguards in place to inform and protect consumers and prevent youth use or accidental intoxication. In our opinion, the OCM has already done a very thorough job in creating a package of regulations around this licensing that is more detailed and compliance-based than any other state. A change to these laws will only put our New York producers at a disadvantage against competitors from other states and more businesses will choose to build their manufacturing facilities and create the skilled-labor jobs required to operate them elsewhere. We urge you to



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				reconsider this extreme change in legislation, do away with the proposed 15:1 ratio and adopt a more moderate 5mg/serving limit and focus instead on enforcement actions against the small number of bad-actors who are blatantly flouting the rules already in-place around marketing to youths and and exceeding reasonable boundaries on dosage amounts. We believe that New York can continue its path to becoming a national leader in this industry by avoiding over-correction and adopting reasonable, defensible regulations that create opportunity for entrepreneurs like ourselves to build thriving businesses that promote New York agriculture and responsible consumption. This latent opportunity has the potential to become a similar success story to that of our state's truly remarkable craft brewing industry. Thank you for your carefully reasoned deliberation and action on this matter, Jeff O'Neil Founder and Managing Partner Industrial Arts Brewing Co.
126.	Malini	Patel	Wherehouse Beverage Co.	We thank you for the opportunity to submit these comments. I am writing to inform you that we have submitted our commentary via email. We would very much welcome the opportunity to discuss them with you and/or answer any questions you may have.
127.	Nick	Galante		This is a joke that you first make the rules and then change them.
128.	Joe	Grabowski	Sarene Craft Beer Distributors	We would like to voice our opposition to EMERGENCY REGULATION – Part 114 Cannabinoid Hemp Regulations, specifically the regulations regarding a minimum of 15:1 CBD to THC ratio and placing a single serving (1mg THC) cap on only cannabinoid hemp beverages. As responsible operators in this space we welcome sensible regulation and agree with ensuring that these products are safe for consumers and that the products cannot get into the hands of children. The OCM has done a great job to date and we believe the public health and safety issues that we are both concerned with seem to have been addressed in these updated regs with the 10mg THC cap, updated labeling requirements, and a minimum age requirement to purchase these products. All of the above regulations are sensible and mirror what most states in the US have done in regards to putting some regulations on these products. What is inconsistent from most other states is the CBD:THC ratio and capping strictly beverages at 1mg THC. It was mentioned at the OCM meeting that numerous other states have instituted the 15:1 CBD to THC ratio for these products, but in our research, we have seen Colorado as the only state so far to do so and the data that was used for



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				<p>the justification of this ratio comes from inhalable products, not edibles, which is the vast majority of these cannabinoid hemp products. A recently released study from Johns Hopkins University that specifically tested delta-9 THC edible products found the following in regards to high CBD:THC ratios: "The results of the study, published Feb. 13 in JAMA Network Open, found that the maximum amount of THC measured in participants' blood samples was almost twice as high after consuming a brownie containing THC with CBD than after eating a brownie with only THC, even though the dose of THC in each brownie (20 mg) was the same. In addition, the maximum amount of 11-OH-THC (a metabolic byproduct of THC that produces drug effects similar to THC) was 10-fold greater after eating the brownie with the high CBD extract compared with the one containing high THC extract."</p> <p>Source: https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2801352</p> <p>The inclusion of this ratio is troubling because it potentially means that consumers could be consuming these products thinking that they will be ingesting 10mg of THC but the high CBD:THC ratio would actually make them feel as if they were ingesting up to 10X that amount of THC, the exact opposite affect these regulations are trying to accomplish. If someone is thinking an edible product would have the effects of a 10mg dose and it affects them as if that is a 100mg dose there will be massive side effects and issues. Some of the side effects listed from the high ratio CBD:THC products include: increased self-reported anxiety, sedation, and memory difficulty, increased heart rate, and produced a more pronounced impairment of cognitive and psychomotor performance compared with THC only and placebo. The research on CBD still has yet to be fully done and no one knows what ingesting these high levels of CBD with THC will cause. Additionally CBD is not an approved food additive by the FDA meaning again there has not been research done on human consumption of this chemical and requiring such a high ratio seems counterintuitive to public safety. The other comment we'd like to make is regarding the regulation that beverages cannot have more than 1 serving per container. The regulations already have requirements for products that do not have easily pre-measured or delineated serving sizes. Singling out only beverage products is inconsistent with the current and newly adopted regulations. If a consumer is looking to become intoxicated with these products we know they will not limit themselves to one single serving, be it an</p>



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				edible product or a beverage. We would ask that beverages be given the same treatment as any other edible product and be allowed to have up to 10mg of THC per container.
129.	John	Moore		I believe you are doing the community (a disservice by what you're doing. I am a sober community member and I believe these hemp derived delta 9 beverages are such a huge component to the Non-Alc space not just as an alternative to alcohol but a much much much healthier alternative. yes, healthy. There is nothing good about alcohol. nothing. there is no benefit to its consumption. It's a depressant. It can literally kill you. Meanwhile products containing CBD and THC have an array of health benefits with virtually zero side effects. And NO hangovers. Pain management, stress relief, anxiety relief. You are taking away a MUCH better than alcohol alternative that has been a benefit to so many. Not to mention I believe your logic for these regulations is majorly flawed. You claim this is to prevent these "intoxicating" products from getting into the hands of the underaged and children...These products are sold ONLY to hemp licensees who strictly/strongly enforce 21+. I believe this is a hasty decision that will hurt more people than you even care to consider. There are much better avenues then to kill a category that has been benefiting so many. Please open your eyes and see beyond your singular scope that these products are "bad" and understand that there is a greater good that you're killing for so many people.
130.	John	Moore		You've made erroneous and unsupported claims that "intoxicating" hemp-derived thc beverages sold to hemp licensees are being distributed imprudently. What evidence do you have of this? why was this all done sneakily? everything you've done here is completely shady with no open discourse allowed before imposing such atrocious emergency regulations on a product you clearly have no knowledge (or care to know for that matter) of how it is HELPING so many people. Especially as a non-alcoholic alternative and wellness product. You're hurting a large community without even considering the benefits these products are providing. Yet you'll laugh about alcohol. a TOXIN that kills almost 7,000 people PER YEAR in NEW YORK FROM OVER CONSUMPTION. and almost 150,000 deaths PER YEAR nationwide. Look at the worldwide figures. it's disgusting. And I'm sure you know that deaths involving over consumption of NATURAL cannabis are ZERO for all of history. Idk if this is a greed thing and if it is ya'll reallyyyy need to be and do better because you clearly have no idea the POSITIVE impact



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				these NON-ALCOHOLIC hemp-derived thc alternatives are having. open your eyes. BE BETTER
131.	Kelly	Steamer		If you don't regulate Everclear alcohol, you shouldn't even think of regulating these seltzers. Catch the fent dealers!
132.	Gavin	Thomas		I strongly object to safe hemp-based cannabis products being removed from easily accessible stores.
133.	Dick	Hammer	Phillip Morris	Hi NYS It's me Richard "Dick" Hammer writing you from the great beyond to tell you what a ##### job you have done rolling cannabis out to the great people of NYS. Now I hear your removing cannabis from shelves, while the cancer sticks that put me in an early grave remain. Genius move, you #####. Think you could ##### this up more, let's see! #####
134.	Meryl	Levy		Please don't end THC drinks from local shops.
135.	Sara	Mooney		I am urging you to continue to allow the sale of canned hemp based products
136.	Christine	Casey		New York State legalized delta 9 strain of hemp to be legal within the last couple of years. Many people in my immediate family who have cancer, sleep issues, and endometriosis have chosen to use the THC seltzers that are able to be legally purchased under the above mentioned NYS law. I have learned in recent days the NYS Office of Cannabis Management is attempting to ban and or prohibit the sale of THC seltzers to the law abiding public. Furthermore, I understand that many local distributors have paid a license fee to be able to legally sell these products. The pharmaceutical companies probably love this news as do the politicians who benefit from their lobbyist campaign dollars. I can attest to the fact that this delta 9 strain THC seltzer (specifically Cycling Frog brand) provides myself and my family pain relief with less side effects than any prescribed medication can do without causing addiction. I firmly believe these products should remain available to the general public at retail locations that have applied for and have been granted the licenses associated with selling them. I feel like this whole situation is a power grab for someone in the state to make more money or tax money to take the upper hand over the general public who benefit from these products. I am asking that you and those in the State Legislature to allow these products to be continued to be sold in NYS as they have been moving forward.
137.	Christopher	McKay		I would like to know why the cannabis control board is in theory only promoting massive black market cannabis and millions to be spent in the next decade on police actions still