

**New Jersey Cannabis Regulatory Commission**  
**Public In-Writing Comments**  
**Permitting and Licensing Committee Listening Session: May 2024**

**Name:** Mayer  
**Affiliated Organization:** N/A  
**Email:** [REDACTED]  
**Comment:** Is trying to make a solarform

**Name:** Josue Erisnor  
**Affiliated Organization:** N/A  
**Email:** [REDACTED]  
**Comment:** Wanted to know more information about the start up process

**Name:** N/A  
**Affiliated Organization:** N/A  
**Email:** [REDACTED]  
**Comment:** It has been one of the most disappointing process's I have ever been through. I own several businesses and dealing with incompetent people is frustrating. I have been chasing a license for well over 2 years. I am a competent, financially secure business owner and all would agree qualified to own and operate a dispensary. Why does it have to be, an unqualified individual not only gets to open a store they will never own because of side deals, to a state representative that is incompetent to the point of not even answering an email for months. I have several hundred thousand of frozen capitol, only to be told maybe a few months. Is there a process of vetting the applicant from start to finish? Inquiring and speaking to others makes me feel I may be getting mistreated or discriminated against. Please no recourse.

**Name:** Wesson Saintil  
**Affiliated Organization:** N/A  
**Email:**  
**Comment:** I'm in the retail business right now (Furniture), what are the basic requirements in order to apply to become a distributor?

**Name:** Tim Weigand  
**Affiliated Organization:** N/A  
**Email:** [REDACTED]  
**Comment:** Commenting on what is known as the "Dual Supply Chain Issue" which is caused by requiring ATCs serving both medical patients and recreational customers to maintain two instances of Metrc. This effectively forces ATCs to keep two entirely separate inventories – one for our medical patients and one for our recreational customers. It creates twice the amount of work needed for all inventory processes, maintaining accurate counts, and completing routine reporting.

We understand the intention of the requirement – which is to ensure inventory is prioritized for medical patients and that proper taxes and fees are being accurately accounted for recreational sales. However, there are better ways of accomplishing this other than requiring two separate instances of Metrc. In truth, both feats would be easier accomplished if ATCs only had to use one instance of Metrc. Medical inventory can be prioritized using a dispensary's POS system, where settings can be enabled to automate and ensure quantity thresholds and inventory stock levels. Products that are approved for medical only sales or recreational only sales would be maintained and sold appropriately via POS. Settings can be enabled to automatically identify recreational product sales to apply all applicable taxes and fees.

Requiring two separate instances of Metrc also means an ATC has to keep two separate instances of our POS systems and ecommerce menus – in essence it requires a single dispensary to operate as two separate stores. This creates additional software costs for the ATCs, as we are being charged by Metrc, our POS companies, and ecommerce platforms for two separate locations. Changing the requirement to allow ATCs to only use one

instance of Metrc would not only reduce workloads and make processes more efficient, it would create notable cost savings as well. This is likely also true for the CRC's own operations – as our CRC state monitors need to oversee both of our Metrc inventories – the CRC would undoubtedly also benefit by only using one instance of Metrc.

In lieu of changing any regulatory language or issuing new guidance, Valley Wellness, as well as a couple other ATCs, have worked with our independent POS software to developed SOPs that satisfy the current compliance regulations of updating both Med and Rec instances of Metrc once per day - but would keep all inventory together on a single instance throughout the normal sales day. This new process is based on turning off the active real-time synchronization between Metrc and our POS, and instead would have us doing batch uploads of sales records once per day. While this would not eliminate all additional costs of having two instances of Metrc, it would still drastically increase efficiencies across inventory processes.

We believe that this new proposed process is fully compliant, however our SOPs have yet to be approved or receive any comment. We have tried to follow up with the CRC regarding these SOPs numerous times. This past February we also performed a live demonstration for members of the CRC, including Director Brown, to show and explain the process.

Ultimately the best solution to the “Dual Supply Chain Issue” would be to eliminate the requirement of ATCs maintaining two separate instances of Metrc. However, if the CRC were to at least approve the workaround SOPs submitted, it would still be a significant step of progress as ATCs could immediately begin to implement new procedures that increase our efficiencies and reduce the burdens of maintaining two separate instances of Metrc.

**Name:** Ruben Moreno

**Affiliated Organization:** N/A

**Email:** [REDACTED]

**Comment:** To whom it may concern, My name is Ruben Moreno. I'm a middle school bilingual (Spanish) teacher by day and MBE cannabis entrepreneur by night. I ventured into the cannabis industry after buying into the social equity encouragement and receiving encouragement from my prospective municipality. Currently, the golden green veil of social equity in the cannabis industry has lifted and I have stared in the face of discrimination, willful ignorance, and desolate solitude. Luckily, I'm from NJ and it'll take more than that to scare me away. I do have grave concerns however, which I believe you'll be able to help with.

Firstly, the municipality has still never formally responded to me and I submitted a complete application in October as per the zoning officer. I've been to zoning meetings, council meetings, the manager's office multiple times, and attempted to communicate with the councilmen individually. Come to find out, they've decided long ago that they're not going to approve any application, “until at least six months after the first dispensary in town opens”. It's absolutely wrong for them to continue to accept applications and give me the run around while knowing they're not interested and I'm spending my resources.

The inability to compete with those more fortunate is a barrier to equity. This leads me to a suggestion for the CRC. Establish a trust, composed of board members reflecting the diverse population it's advocating for. The trust can be used for social equity applicants/prospective applicants who would benefit the most from legal assistance, financial assistance, referrals, etc. Additionally, a majority of Alternative Treatment Centers are owned by MSO's. We're at a critical point with slim pickings and the industry needs to reflect more social equity and NJ based operators. I propose allowing all social equity operators to be allowed up to (4) retail locations and also be able to completely vertically integrate from class 1 through class 6. This advantage will offset the interest in investors trying to enter the market by having a clear advantage to support our efforts. Currently, I'm in great communication with a different town. We have a location that the town likes and it seems very promising. Your consideration is greatly appreciated.

**Name: James Tundidor**  
**Affiliated Organization: N/A**

**Comment:** Can a retail licensee owner/individual (not the entity) hold a mfg, cult, and delivery license simultaneously?

**Name: Aslan Zadeh**  
**Affiliated Organization: N/A**  
**Email:** [REDACTED]

**Comment:** I registered to speak and had an emergency, I sincerely apologize to have missed the meeting after registering.

I am Aslan Zadeh with Jersey Smooth, M000016. I believe the CRC has done a terrific job so far with the roll out of the cannabis program in New Jersey. With Chairwoman Houenou leading the efforts, I believe New Jersey is positioned to be the leading state in the nation for the most successful cannabis market. My concern with a regulation that impacts some and will impact many small businesses in the near future is the rule surrounding Satellite locations for standard, adult-use businesses. Many of us started our businesses with a very small footprint. The more successful a business becomes, the quicker they will outgrow their existing facility. ATC's currently have the ability to acquire satellite locations with their existing licenses. All I ask is that we apply similar rules and regulations to adult-use businesses and allow them to apply for Satellite locations. For example, our facility is 4,200SF and although we have just begun operations, I can see us outgrowing the current facility in a very short period of time.

Thank you for hearing my concern, and I look forward to working continuously alongside the CRC.

**Name: Joe Nathen Watson**  
**Affiliated Organization: N/A**  
**Email:** [REDACTED]

**Comment:** The municipalities need to have guidelines My company BakedGoodz has been before the East Orange City Council so many times and each time they come up with something different for us to come back and explain. This has been going on for over a year. We were the first one to have our application in and made it to the final cut which consisted of about 12 standard retail businesses, and we were the only micro retail to make the cut. We had our location and were paying rent, but they chose a standard who planned to build a location near us. They then told us to find another location. This was their only concern they had at the time, so we then found another location within a week and came back before the council and they then asked us about our funding which was already a part of our application, so we had to present another financial explanation and then they said that because they changed their ordinance we needed to go all the way back to the East Orange cannabis board and resubmit our new location for their approval. We have again done what the council asked, and they are telling us that there are still delays before we can get back before the City Council. Meanwhile we have now reached our last extension and we had our application in with East Orange when we first got our Conditional in 2022. We were first seen by East Orange on March 22, 2023, and it is now May 16, 2023, and we are still going back and forth with them. We are a Micro business and we have been the most scrutinized applicant. Lastly each time they request something from us we respond with what they ask for with a 2 week period but they don't see us for at least 3 months. We could have been open by now.