

1-16-18

Department of Taxation

Public Comments to be posted as an Official Record

By Mark Bradley, CEO

Players Network and Green Leaf Farms.

***Proposed Regulations that promote fairness and Industry growth to be adopted in the new ME retail licenses applications.***

As a non-integrated cultivator, it has been very challenging to sell our products to any dispensary who has their own cultivation facility, which includes a vast majority. If no new licenses are issued to us and other cultivators, the future is grim for us. I would like to see an end to the continued monopolistic consolidation of granting more ME retail licenses to current holders, as this current model will result in anyone without a retail license being dependent on having to outsource product in order to survive.

**Solutions:**

1. Priority and first right of refusal should be granted to all Production and Cultivation license holders who don't currently have a dispensary and are applying for new licenses as long as they qualify.

A. At the very minimum, higher merit points should be granted to non-retail license holders.

2. **Question #2** was intended to reward entities who took the most risk 3 years ago to receive the priority for new licenses. Many holders of retail licenses never opened their doors and sold their license and operation for \$5 million to \$15 million within a year.

A. People that purchased those licenses never had to qualify for the ones they purchased and should not be allowed to apply for more retail.

B. At the very least, entities who are still owned by 100% of their original membership should receive higher merit points.

C. To reduce the amount of applications from people with the intention of never opening and instead selling their licenses for millions, any new licenses granted should be limited from sale or transfer until they have opened and operated for at least 1 year. They should be permitted 6 months to open in an existing building or 18 months if they are building from the ground up. Otherwise, said party should be required to return the license to the state and have it reissued to the next applicant who qualifies.

D. To also help eliminate a free-for-all, the state should require a physical approved location with their application.

3. I believe higher merit points should be granted to applicants who made a greater investment in building the industry, not those who has paid the most taxes.

4. In conclusion, if Green Leaf Farms receives a retail license, we plan to carry as many products from a diversified group of Nevada cultivators in our stores as possible.