



MARAPHARM VENTURES LLC

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General Program Mailbox
Nevada Department of Taxation
555 E. Washington Ave, Suite 1300
Las Vegas, NV 89101

April 20, 2017

To Whom It May Concern,

I'm writing on behalf of **Marapharm Las Vegas LLC** regarding the recent Workshop on Proposed Temporary Regulation on the Recreational Marijuana Program, and I would like to request for your office to consider extension of the May 31st, 2017 cutoff date.

The proposed regulations imply that licensees who cannot process a transaction on or before 30 April will be unable to meet the tax filing deadline of 31 May with the Department of Taxation. Per the proposed regulations, those unable to meet this deadline will not be considered in "good standing", will be unable to apply for a temporary adult-use license, and subsequently prevented from applying for distribution licenses.

Marapharm Las Vegas, LLC ("Marapharm Las Vegas"), a wholly owned subsidiary of Marapharm Ventures Inc., is the operating entity for Las Vegas, Nevada. Marapharm purchased 7 acres of land in the Apex Industrial Park for the purpose of constructing marijuana facilities. Three Special Use Permits (SUPs) have been approved by the City of North Las Vegas. The medical marijuana provisional licenses are for different areas covering 204,000 square feet of cultivation, 70,000 square feet of cultivation, and 16,000 square feet of production (oils and edibles). Construction permitting has also been approved. Two 5,000-square-foot starter buildings were delivered on December 19, 2016. The starter buildings will be used for training staff and providing interim product to market. Marapharm has an experienced and competent team in place for the starter buildings as well as for the build out of more than 360,000 square feet of buildings, to house up to approximately 300,000 square feet of cannabis cultivation and processing.

The completion date for the starter buildings was estimated to be April 1st, 2017, however due to delays regarding infrastructure and utilities construction has been held back.

After discussions with various other provisional establishments, I know that we are not alone in the desire for an extension of the 31 May deadline. There are many other groups with provisional licenses completing construction under similar timelines. An extension of the deadline to 31 July would provide sufficient time to meet the requirements of "Good Standing" set forth in the proposed temporary regulations.



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Considering the previous discussion, we would like to respectfully request the following:



1. Extend initial "good standing" measurement for "early" adult-use licensure to 31st July, 2017
2. Allow subsequent rolling monthly good standing measurements that are on par with all others
3. Include applications for distribution licenses in 1. and 2.

1. A medical marijuana establishment that has received a medical marijuana establishment registration certificate and is operating and in good standing, as defined in subsection 4 of this section, under its medical marijuana establishment registration certificate may apply for a marijuana establishment temporary license no later than ~~May 31, 2017~~. July 31, 2017.

5. As used in this section, a medical marijuana establishment is "operating" if it filed a return and paid the tax imposed by NRS 372A.290 prior to ~~May 31, 2017~~. July 31st, 2017.

We understand that our requests may present a staffing challenge at the Department. If extra staff are required to assist in processing post 31 May applications, the financial burden should be passed along to the applicant operations. We strive to be as helpful and supportive of the Department as possible and appreciate your efforts towards efficiency and fairness. Thank you for taking a few moments of your time to consider our concerns.

Sincerely,


PER: 

Linda Sampson, CEO
Marapharm Ventures Inc.
778-583-4476