

To: Deonne Contine
Tax Department Director

I attended the Nevada Department of Taxation Regulatory Workshop yesterday, March 29th and testified in regards to “good standing” and “operating” requirements as defined in the proposed NAC regulations. I am following up with a suggested amendment.

12.1 A medical marijuana establishment that has received a medical marijuana establishment certificate and is *operating* in good standing, as defined by subsection 4 of this section.....

Subsection 4: I agree with this entire section

Subsection 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 prior to May 31, 2017. REMOVE.**

The Review Journal’s article this morning’s headlines: **New Nevada marijuana companies could be squeezed out of early sales....**

In the cultivation business we must “grow” our product and that cultivation time frame is between 90 to 120 days. In order to have sold a product by April we would have needed to start our clones in December 2016. Almost 6 months prior to the May 31, 2017 application deadline.

We are operating on a daily basis and will sell our first product in May 2017 and taxes will be paid in June...Yet...by these proposed regulations I am NOT in good standing or considered to be in operations.

I would encourage you to take this amendment into considerations while you are redrafting the proposed regulations that will be presented to the Tax Commission, May 8th.

Thank you

Sandra Tiffany