



Date: May 6, 2020

To: CalCannabis Cultivation Licensing
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

cc Secretary Alex Padilla
California Secretary of State Office
1500 11th Street
Sacramento, CA 95814

Trademark Division
Attn. William Downs (wdowns@sos.ca.gov)
Head of Special Filings Unit
1500 11th Street, 2nd Floor
Sacramento, CA 95814

Re: Comments on Draft Cannabis Appellations Regulations

To Whom It May Concern:

Canbar Association, dba the International Cannabis Bar Association (INCBA), is a non-profit association of attorneys that serve the business needs of cannabis market participants. Founded in San Francisco in 2015, INCBA has over 700 members worldwide, with a plurality of those members practicing law in California. INCBA has taken an interest in this set of rulemaking because of our members' interest in seeing an efficient program, one that could potentially serve as the template for other states to follow in creating cannabis-focused appellations of origin programs.

At the outset, we acknowledge the CDFA's difficult task of protecting consumers while creating robust marketing opportunities for cannabis cultivators. We have every expectation that California's cannabis appellations will break new ground and the CDFA's program has the potential to create the first standards for cannabis appellations in the world. The historic nature of this program warrants our formal support for a program grounded in *terroir*, not simple geographic indication, as explained in detail below.

To that end, we encourage the CDFA to adopt a *terroir*-based approach to the California cannabis appellations of origin in order to adequately differentiate the program from other types of intellectual property rights. As discussed herein, a *terroir*-based program would be better at explaining to consumers the unique characteristics of regions where cannabis is cultivated. It is our belief that a *terrior*-based standard would better inform consumers about the value associated with appellation regions.

We would also ask the CDFA to work with the California Secretary of State to create the opportunity to register certification and collective marks. The ability to register these types of marks is currently not an option with the United States Patent and Trademark Office and we believe them to be essential tools for the success of the appellations program. By allowing certification and collective marks

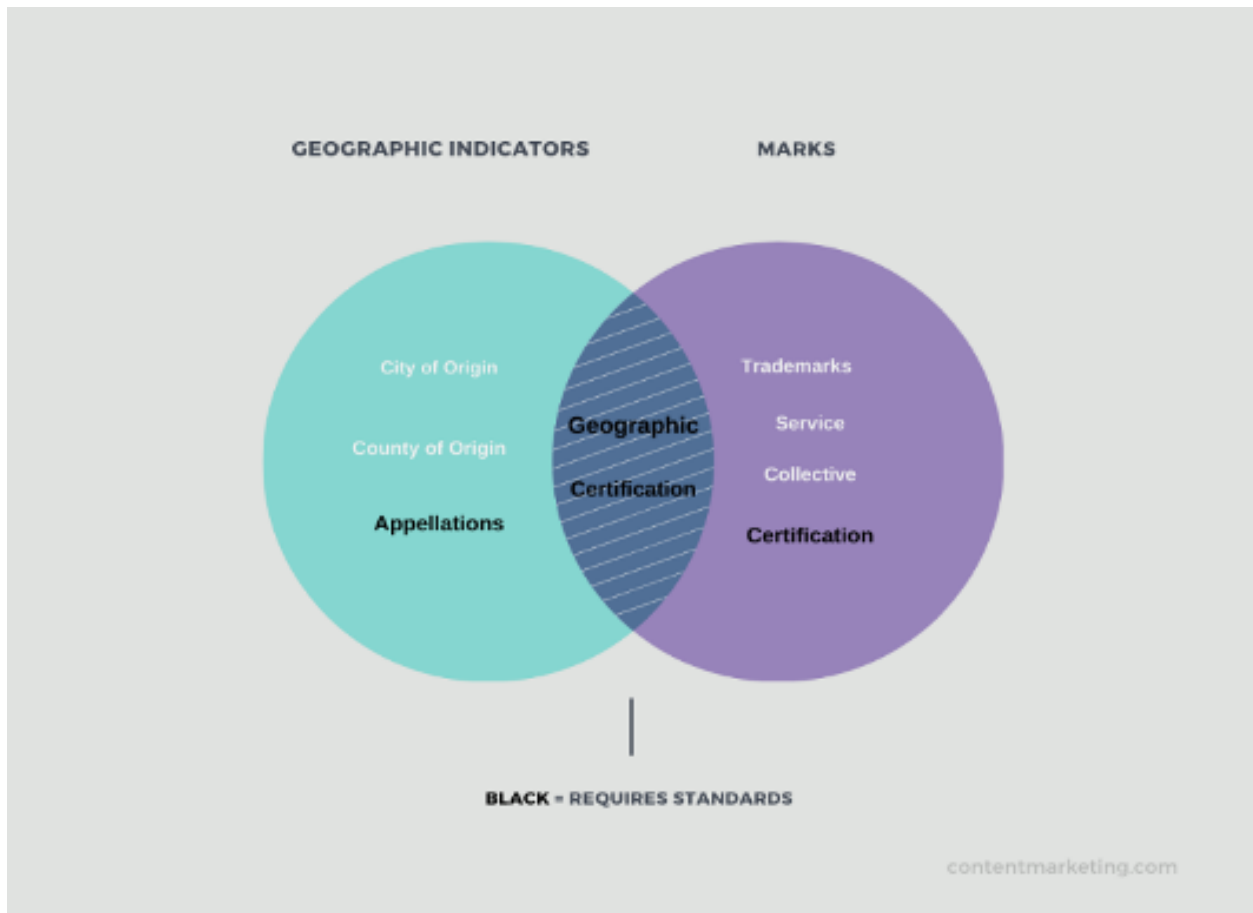
to be registered at the state level appellation petitioners would have a greater ability to protect the intellectual property associated with their appellations.

Understanding that even minor changes to the draft regulations could have large consequences, our comments are intended to increase the program’s likelihood of success and viability for the future. In proposing this alternative structure, INCBA endeavors to offer solutions as-or-more effective in carrying out the purpose for which this rulemaking action is proposed.

The INCBA comments as follows:

1. Appellations are a Form of Intellectual Property and Must be Considered Along with Other Pre-Existing Systems

In order to have a cohesive system of recognizable marks that convey adequate information to consumers, appellations of origin should be one of a set of complementary intellectual property tools. A Geographic Indicator (“G.I.”) should be distinct from a Collective or Certification Mark, which should be distinct from an appellation of origin. By implementing a terroir-based Appellation of Origin system the CDFA will be creating standards that better highlight, and protect, the unique characteristics of the diverse cultivation regions of California.



A. Geographical Indicators



It is well-established that an “appellation” is a form of a Geographical Indicator (“G.I.”). California already has established a form of G.I. for cannabis, namely, the “county of origin.” There is also the possibility of recognizing a “city of origin,” as another form of a G.I. in California. These two types of G.I.s readily convey to the relevant consumer the place where the cannabis comes from.

In establishing cannabis appellations in California, one objective should be to complement these more literal G.I.s, to supplement them, not to overlap with them. In creating regulations for cannabis appellations, there should be strong consideration of the history of Appellations of Origin, Appellation d'origine contrôlée, and to some extent American Viticultural Areas, and create a program that it can be more than the product merely originating from a geographical area. It is the addition of “Standards, Practices and Cultivars” to the California Appellation regulations that begins to introduce a distinction between an appellation and other forms of G.I.s. That said, a terroir-based appellations system would impose the highest standard to such cannabis designations, which is what many stakeholders are seeking. To the extent that some cannabis operators will be excluded from a terroir-based system of appellations, there are other intellectual property programs that the state can offer which would be more appropriate than making California’s appellation program one-size-fits-all, which is why we are advocating for the ability to register certification and collective marks.

Significantly, with the addition of Appellations into the regulatory scheme, there can be a hierarchy of G.I.s for cannabis operators to choose from to communicate their comparative benefits in a simple manner. From free G.I.s, *e.g.*, city of origin and county of origin, to a robust appellations program, the G.I. program is inclusive. While a terroir-based standard would exclude certain licensed operators, there is a straight-forward solution to providing strong marketing tools for all operators: Introducing certification and collective mark registration processes at the California state level. As discussed below, implementing a California registration system for certification and collective marks will allow for greater collaboration among indoor growers, greenhouse growers, equity licensees, and others, who may not be able to qualify for an appellation or cannot afford the significant application fees.

It is important to recognize the benefits of all intellectual property systems and provide programs for all. This cannot be a one size fits all approach. The California cannabis industry deserves robust protections for operators and consumers.

B. Certification and Collective Marks

In addition to G.I.s, there is a parallel set of intellectual property tools that cannabis operators can use to distinguish themselves from other cannabis operators. Under United States trademark law, in theory, there are trademarks (for tangible goods), service marks (for intangible services), collective marks (signaling that the source of a particular product is from a member of an established group), and certification marks (signaling that the source of a particular product meets certain requirements set by a standards setting group). There is also a special type of certification mark, a “geographic certification mark,” which serves a dual purpose of communicating that the goods (or services) originate from a particular geographic region and meet certain standards.

We say in theory because the United States Patent and Trademark Office (“USPTO”) is not issuing trademarks, service marks, collective marks, or certification marks, geographic or otherwise for goods or services that are federally unlawful. Thus, this is an opportune time for California to introduce a system for granting collective and certification marks, as they did in 2018 for trademarks and service marks. We would anticipate that the California Trademark Division, under the Secretary of State (“SOS”), would follow



nearly the same process and procedure for granting such marks as the USPTO; meaning the SOS would rely on the procedures set forth in the federal [Trademark Manual of Examining Procedure](#) (the “TMEP”), specifically Sections 1302 (Collective Marks Generally); 1303 (Collective Trademarks and Service Marks Generally); 1304 (Collective Membership Marks); and 1306 (Certification Marks), with a focus on 1306.5 (Geographic Certification Marks).

Recognizing that a single tool (appellations) or other geographic indicators (city or county of origin) will not serve all cannabis operators, we ask that you consider the interplay between the various forms of Intellectual Property discussed herein, and offer them all to the cannabis industry. Each comes with certain benefits and costs for obtaining such Intellectual Property; offering an array of intellectual property options will serve the California cannabis industry best.

2. Synthesizing Existing Geographic Indication and Appellation of Origin Definitions/Policies

Under the current proposed regulations, an appellation of origin is defined as the following:

“(b) “Appellation of origin” means the name established through the process set forth in chapter of this division.” Section 8000(b).

In context with the proposed regulations, it is understood that “appellations” means the name of a geographic area in which the cannabis is produced along with Standards, Practices and Cultivar Requirements. (Sections 8212((b)(5)-(6); 9107) seq.)

The current approach to “appellation of origin” is lacking, as the draft regulations definition subverts the program to a merely “geographic indication.” Please consider the following definitions, starting with the definition of “geographical indications” in the World Health Organization’s TRIPS agreement, which states in Article 22 (1):

Geographical indications are, for the purposes of this Agreement, indications which identify a good as originating in the territory of a Member, or a region or locality in that territory, where a given quality, reputation or other characteristic of the good is essentially attributable to its geographical origin.

Defined in law under the [Lisbon Agreement](#), appellations are:

*[T]he geographic denomination of a country, region, or locality, which serves to designate a product originating therein, the quality or characteristic of which are due **exclusively or essentially** to the geographic environment, including natural and human factors.*

Moreover, the European Union defines a “designation of origin” as:

*The name of a region, a specific place or, in exceptional cases, a country used to designate an agricultural or food product originating in that region, of this particular place or country, the quality or characteristics of which are **essentially or exclusively** due to a particular geographical environment, including natural and human factors, and the production, processing and processing of which take place in the defined geographical area.*



While a geographic appellation can be defined merely by regional reputation in the former, the latter requires the product's quality or characteristic be "*exclusively or essentially*" attributable to its geographical origin. (*Emphasis added.*) Notably, CDFA is not legally prohibited from employing the higher standard.

Finally, noting there is broad support from stakeholders in legacy producing areas to employ an "essential" and/or "exclusive" standard as opposed to a mere geographical indication, we propose the following definition to establish cannabis appellations which can be recognized worldwide:

"Appellation of origin" means the name of a geographic area in which cannabis is cultivated, harvested, and processed. The quality or characteristics of the cannabis is **essentially** due to a particular geographical environment, including natural and human factors which take place in the defined geographical area established through the process set forth in Chapter 2 of this division."

By establishing a terroir-based standard for cannabis, California can mirror existing appellation systems that are readily differentiated from more simple G.I.s, which California already has access to through county of origin indication. Maintaining this distinction will allow the CDFA to create standards that illustrate, and preserve, the uniqueness of the different cultivation regions of California. We believe baseline standards for natural sun and soil cultivation will need to be defined by the CDFA to establish requirements for a petition, but we do not believe it is our place to comment on what those standards should be.

A. A related and important consideration in developing a process for appellations is the relationship between current wine appellations and planned cannabis appellations. The regulations provide no guidance to potential petitioners regarding the selection of cannabis appellation names and potential issues. It is possible, and even likely, that the boundaries for a proposed cannabis appellation may not be consistent with and/or completely overlap with an existing wine appellation, creating the potential for consumer misunderstandings. Thus, it is important for an applicant of a cannabis appellation to, at least, consider whether there is already a wine (or otherwise) appellation or AVA by the same name in California, the U.S., or elsewhere.

(1) If the cannabis appellation boundaries directly overlap with such appellation/AVA, and that appellation/AVA has been successfully communicating its geographic boundaries, it is important (even merely as "good" neighbors) to meet with that established appellation/AVA to assess whether the wine and cannabis operators can work together or at least minimally co-exist, or perhaps whether the wine appellation may plan to challenge the cannabis appellation.

(2) But, if the established boundaries for the wine appellation/AVA are different, it would be important to appreciate the significance of different boundaries, specifically whether having different boundaries might create marketplace misunderstandings based on the recognized reputation of the region or, particularly, the reputation of the appellation. A large part of introducing cannabis appellations will be communicating to the relevant consumer the uniqueness of a specific geographic region (geography, topography, climate, soil, water, etc.) and establishing consumer recognition for that combination of Standards, Practices, and Cultivars. It could be unfair to consumers and existing wine



appellations/AVAs if a new cannabis appellation doesn't at least share the same boundaries, thereby muddling the marketing message for that geographic area.

3. **Significant Potential for Collective and Certification Marks at the State Level**

In part due to the high costs of creating an appellation (estimated at close to \$70,000 from start to launch), other options should be offered to the diverse groups of cannabis operators in California. Each type of license does not require all the features associated with an appellation. As discussed above, we believe that California would be best served by not only offering Appellations requiring a terroir-based standard, but that it should offer certification and collective marks at the state level. Doing so would offer non-terroir-based cultivators, *e.g.*, indoor growers, greenhouse growers, a group of equity operators, etc., the opportunity to come together under a collective or certification mark and collaborate on shared promotion, advertising and marketing.

We note that in Section 9107 (b)(2), the Proposed Regulations, the CDFA refers to "certification marks registered with the United States Patent and Trademark Office ("USPTO") and applicable to cannabis." However, The USPTO is not issuing registrations for any trademarks, service marks, certification marks or collective marks in connection with cannabis goods/services that "touch the plant." As discussed herein, we propose that the CDFA coordinate with the California SOS to establish an application/registration program for certification and collective marks at the state level to complement the geographic indicator and appellations programs.

As there is absolutely no indication that cannabis will be federally legalized in the near future, and, more significantly, because interstate commerce of cannabis, specifically "marijuana," is not lawful, California cultivators who may only cultivate, sell, and distribute "marijuana" in California cannot obtain federal certification (or collective marks). To make the appellations program meaningful to a broader range of local cultivators and membership groups that may not be able to afford or qualify to establish an appellation, the California SOS should establish an application/registration process for both certification and collective marks.

A. Section 9203(c)

The language in Section 9203(c) appears to temporarily protect trademark owners for 3 years following the date an appellation is established from a claim of misbranding or false advertising. It would seem that if a trademark owner is misusing a geographic indicator, either through misbranding or false advertising, that trademark owner should be challenged, independent of whether an appellation is being created. If 100% of the cannabis is **not** coming from the geographical area identified in the trademark, there should be no sunset. Why should consumers be subject to misbranding or false advertising for a minimum of 3 plus years? But if the cannabis is in fact coming 100% from that geographic region, a 3-year sunset is appropriate. Unfortunately, this policy could leave geographic trademarks and appellations coexisting at a time when appellations are being established and consumers are being educated.

It is important to recognize that if a geographic area is already known as a cannabis producing region, such trademark should not have been issued, at least under federal guidelines, which require an application be refused if the applied-for mark has a primarily geographic significance, meaning that: (1) the primary significance of the mark is a generally known geographic location; (2) the goods originate in the place identified in the mark; (3) purchasers are likely to believe that the goods originate in the geographic place identified in the mark. The federal and state trademark systems are aligned in that exclusivity cannot



be granted for a descriptive term, geographic or otherwise, that others need to use to accurately describe their goods. [TMEP Section 1210.02](#).

But, so long as 100% of the cannabis is cultivated in the specified geographic area, the trademark owner has the option of adhering to the Standards, Practices and Cultivars established through the appellations petition process. Given the value of an appellation, in terms of increased sales revenue, appreciated land value, ancillary value to the community derived from tourism, and consumer protection/recognition, joining rather than challenging the appellation could be the prudent approach for a trademark owner. However, to the extent that there may be factual situations where the value already created by the trademark owner outweighs the value of joining an appellation, litigation may ensue.

In the situation where the trademark application or registration predates the creation of an appellation, it will be important to consider whether the geographical area was known at the time the relevant trademark application was filed, and it inadvertently “slipped through” examination at either the state or federal trademark office. Nevertheless, granting of an appellation formally recognizes the region as a cannabis region, and whether the geographical region had a primarily geographic significance at the time the application was filed or the registration issue, will require a highly factual analysis.

In addition, even geographic marks can acquire distinctiveness after an exclusive and/or extensive period of use in the marketplace. If there are cannabis trademarks that fit the criteria, those facts should be the focus of any analysis. It is possible that establishment of such a trademark could have been the precedent for the area flourishing as a cannabis cultivation region, and but for the growth of the brand, there would be no appellation. Again, a highly factual analysis.

In any case, in order to comply with this section, there **must** be a publicly available database for proposed establishment of appellations of origin (under Section 9201) and established appellations (under 9202). Otherwise, how can an entity seeking to register a trademark effectively check and/or clear itself of any potential issues concerning appellation right holders? Is such a publicly accessible database contemplated?

Section (c)(4) requires that use of a Mark at issue, for a 3-year period after the appellation was established, must be accompanied by a county of origin or appellation of origin applicable to the cannabis and must clearly indicate the geographical origin (pursuant to Section 8212). To the extent that petitions for appellations may be filed as soon as January 2021, Section 9203 is frustrated and has limited applicability, as Mark owners with marks encompassing geographical references who are not seeking appellations are likely not aware of this granular and onerous requirement.

(1) Trademarks

There is also no substantive guidance on avoiding conflicts with already pending applications or issued registrations for trademarks, service marks, collective marks, and certification marks (federal or state, as applicable) (collectively generally referred to as “Marks”). If the risk is being placed on the trademark owner, the afore-mentioned publicly accessible database is critical, as is education to trademark counsel and trademark owners. As some trademark applications are filed by their owners, without the support of a trademark attorney, such education to cannabis operators will be pivotal. Could there be an announcement about appellations and key criteria issued as part of granting any future licenses? Could all current licensees be notified?



The language in Section 9203(c) seems to imply or assume that after the 3-year period, an appellation enjoys superior rights or somehow trumps a registered Mark (referenced in 9203(c)(1)). It is entirely unclear under what authority and what process such trademarks would be challenged. The federal trademark system does not even recognize rights in state cannabis trademarks and thus the standard mechanisms at the USPTO would not be available to an established appellation to challenge a mark.

Moreover, it is necessary to specifically and clearly address and communicate the scope of protection permissible for Marks incorporating a geographic component or as to geographic certification marks and how priority is recognized under trademark law. Otherwise, there will be unnecessary and inappropriate enforcement actions. It is important for appellation applicants and owners to be educated to understand that Mark owners can incorporate a geographical indicator within a mark, such as a county or city of origin, but not a granted appellation, and may continue to use such mark in perpetuity (not the 3 years referenced in Section 9203(c)), so long as they are using the geographical indicator descriptively and accurately under the “Fair Use” doctrine. To clarify, if a G.I. is being used accurately (100% of cannabis coming from an identified region), there is no misbranding or false advertising and it is not subject to the 3 year sunset.

(a) Date of Trademark Application vs. Date of Registration

Subsections 9203(c)(1) and (c)(2) provide criteria restricting the exemption to trademarks registered before an appellation comes into effect and trademarks established under common law in California, also prior to the establishment of a particular appellation. However, the international standard for establishing priority in a trademark is the **date a trademark application was filed, not the date of registration**. One important exception is when filing applications internationally under the Paris Treaty, where an applicant can claim the date that their underlying application was filed in their home country, if they file within 6 months of filing their underlying application. These international conventions cannot be ignored and California can also establish stricter standards for cannabis appellations. Moreover, the application process for cannabis Marks can be an extended process, making the application filing date even more meaningful to a trademark applicant. Expecting trademark owners to voluntarily abandon and/or change their mark based on the creation of a cannabis appellation is not realistic in the U.S. or worldwide. However, if they are using a GI misdescriptively, such registered trademark could be challenged. Significantly, establishing appellations cannot be at the detriment of a long-established, international system for protecting trademarks.

(b) Common law trademark rights must be considered

Even for Mark owners relying on common law (unregistered) rights (referenced in 9203(c)(2)), as discussed above in connection with the “Fair Use” doctrine, a Mark that incorporates a county of origin, city of origin or some other geographic reference may be valid and enforceable, irrespective of whether the Mark was ever formally registered, much less whether such a Mark was registered prior to an appellation being proposed or established. This is particularly relevant in the cannabis context, as the U.S.P.T.O. does not issue registration for Marks in connection with unlawful “marijuana” and California only started registering marks for cannabis as of 2018, meaning not many cannabis operators have obtained trademark registrations. In other words, otherwise enforceable Marks should not be invalidated simply by virtue of the creation of an appellation of origin involving a reference to a similar or related geographic region, so long as that reference is accurate and the cannabis comes from the identified geographic region.

(2) Special Case: Merchandise



As it is likely that appellations will want to offer merchandise and clothing, there a concern that there could be brand/appellations collision, *e.g.*, [Garnet Hill](#), [Willow Creek](#), who are likely not using their marks in a geographically descriptive manner and are rather using a geographic designation in an arbitrary manner. This could be addressed by clarifying that appellations are unique to cannabis, wine and other agricultural products and will not allow an appellation to be established and then trump Marks established for products other than agricultural products.

(3) Discrepancy

Section 9203(c)(1) and (c)(2) refer to the date of a “notice of proposed establishment of the appellation of origin” pursuant to Section 9201, as a basis for specific deadlines, when in fact, Section 9201 refers exclusively to a “notice of proposed action” and does not use or refer to the term “notice of proposed establishment of the appellation of origin.” It is unclear whether the CDFA is mixing terms or whether a notice of proposed establishment of appellation of origin is in fact a notice of proposed action.

4. Use of an Appellation Seal

To incentivize the State of California to promote, preserve and protect the value and integrity of cannabis appellation of origin designations, we propose an “Official” seal. A “Official” seal would feature a uniform design element (the ring on the outside with the wording OFFICIAL CALIFORNIA CANNABIS APPELLATION) and a unique appellation design (inside the ring), that features the specific appellation logo. It is important to relieve individual appellations of being solely responsible for enforcement, because with an official seal, the state would have an appropriate inducement to take up some responsibility for ensuring that the official seal is not misused. Use of the proposed official seal would be subject to a modest fee to help fund the CAP as well as incentivize official enforcement against misuse.

The seal could be similar to the ones used in Europe, such as the following:



According to the CDFA’s Initial Statement of Reasons (“ISOR”), “[u]nder the proposed regulations, consumers are provided information regarding the origin of cannabis and associated production requirements. The use of origin designations on cannabis can provide consumers with information about the attributes of the cannabis that are difficult or impossible for consumers to determine prior to purchase.” (ISOR, p. 3). Thus, one of the guiding purposes of the appellation of origin regulatory framework is to provide a means for the consumer to obtain additional information that would assist the consumer in differentiating among products, particularly those affording the appellation of origin designation.

In order to assist this underlying purpose, the proposed official seal system would provide consumers with key information that could achieve noted objectives of the program such as: “facilitat[ing] purchasing decisions, [and] enhanc[ing] the overall consumer experience, and benefits the efficient operation of the market in general by helping to get the most appropriate product to each consumer more often or at a lower cost.” (ISOR, p. 3). Indeed, by implementing an official California seal system, consumer confusion could be greatly reduced, counterfeiting could be frustrated and potentially prevented outright, and could enable “enforcement against the misuse of recognized geographical indications (GIs) to prevent misleading [sic] consumers,” key concerns and objectives noted by the CDFA in the creation of the proposed regulations. (ISOR, p. 3).

5. Alternatives to Proposed Fee Structure

One-time funding of a program expected to continue into perpetuity is unwise as it puts a substantial burden on the initial applicants. We strongly recommend the agency re-work and further develop its manner of funding. Rather than seek a large upfront payment, which would impose an almost-insurmountable barrier to entry to struggling farmers, we request that the CDFA consider the following alternatives:

A. Charge an initial \$500 to conduct an initial review of a petition for completeness; this will give the CAP a better understanding of how many groups of licensed cultivators are seriously interested in doing the work necessary to submit petitions, unclouded by financial barriers to entry.

B. Lower the fee for filing a petition to establish an appellation and introduce other fees during the lifecycle of an appellation.

(1) The agency could require fees associated with filing the Notice of Use, which, according to the proposed regulations, must be filed every three years. This is an opportunity to generate revenue for the CAP in perpetuity while lowering the initial barriers to entry.

(2) Separate and apart from Notice of Use fees, we recommend that the CDFA institute Appellation Renewal fees every ten years to fund the CAP program in future decades. Again, this is an opportunity to lower the initial barriers to entry.

(3) Establish a renewal fee, say every ten years. This would accomplish the objective of funding the CAP in the future while making appellations accessible to struggling farmers. Indeed, this would generate far more revenue for the CAP compared to a one-time fee and ensure that the CAP does not wither away for lack of funding in future decades.

(4) Set a modest fee for use of the proposed official seal to help fund the CAP (as well as motivate official enforcement against misuse of the seal).

C. The fees, as discussed herein, are burdensome. There should be a hardship waiver to allow petitions to be submitted with a significantly lower, or even no, fee at all, for at least a minimum for equity applicants, and for others who can prove financial difficulty.

Other Questions or Recommendations

§ 8601. Administrative Actions - Operations.

Marketing and labelling rules should apply to all licensees, including the fines and penalties set forth here.

It is unclear whether the penalties included in this second are assessed per instance or in the aggregate? The CDFA should provide guidance here on how the penalties will be assessed, both in individual instances and in the aggregate. Depending upon how the CDFA plans to implement



enforcement of these regulations (per individual instance or in the aggregate), the proposed penalty range may in fact be quite low. More specifically if violations in the aggregate are assessed at within \$100-\$500 range, these penalties may not be effective in deterring violations of the marketing and labelling rules.

§ 8602. Administrative Actions - Recordkeeping

Record keeping rules should apply to all licensees, including the fines and penalties set forth here.

9000(d), practice should be expanded beyond cultivation practices, but also methods of cultivation, and related activities included within the statutory definition of cultivation. Practice should also encompass activities that are directly related to cultivation, but not cultivation practice or method per se, for example land management practices, human resource practices (living wages for employees), compassionate care donations and practices incidental or related to cultivation.

With regard to section 9100(c), we suggest that the CDFA revisit the requirement of having petitioners pay the full amount of petition fees up front as is required now.

9107(c)(1)'s standard of requiring a description of practice to be drafted in such a way that a person unfamiliar with the practice would be able to comply without further research should be amended to read "without additional research beyond the supporting document included in the petition."

9107(c)(2) should be amended to read "Not use any term likely to mislead or deceive consumers."

9107(d) - CDFA should provide examples, guidance, and parameters regarding "acceptable methods, vendors and practices" and provide updates as additional acceptable methods, vendors and practices are recognized and in good standing with the CDFA.

§ 9200(e) should be amended to change the time period upon which the CDFA will deem a petition abandoned. More specifically, 120 days, rather than merely 60 days of non-response, may constitute abandonment.

We, the legal community serving cannabis businesses, appreciate your time and attention to these comments and the issues raised herein

Sincerely,

Christopher Davis,
Executive Director, International Cannabis Bar Association

Submitted On Behalf of the International Cannabis Bar Association and
The INCBA Committee on Appellations of Origin

Anne Kelson, Co-Chair
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