



CANNABIS CONTROL BOARD

89 Main Street Montpelier, VT 05602 | ccb.vermont.gov

From: Gilman, Gabriel <Gabriel.Gilman@vermont.gov>

Sent: Monday, October 16, 2023 11:34 AM

To: Genevieve E. Kaplan <gek@stateside.com>

Cc: Marvel, Nellie <Nellie.Marvel@vermont.gov>; Fitch, Olga <Olga.Fitch@vermont.gov>

Subject: Re: Rule 5

Ms. Kaplan,

My pleasure. Here's the text that will become effective on the 21st. I expect the amendments will be recorded in the [online Code of Vermont Rules](#) within a few weeks.

Thanks,

Gabe

Gabriel M. Gilman

General Counsel

Vermont Cannabis Control Board

89 Main Street, Montpelier, VT 05620-7001

(m) 802.261.1510

<https://ccb.vermont.gov/>



From: Genevieve E. Kaplan <gek@stateside.com>
Sent: Friday, October 13, 2023 11:50 AM
To: Gilman, Gabriel <Gabriel.Gilman@vermont.gov>
Subject: RE: Rule 5

Hello Mr. Gilman,

Thank you so much for your help. Yes, it would be great if you could send me the final rule filings.

Genevieve Kaplan

Regulatory Associate

Stateside Associates

1101 Wilson Boulevard, 16th Floor, Arlington, VA 22209

o: (703) 525-7466 x259 | gek@stateside.com | www.stateside.com

From: Gilman, Gabriel <Gabriel.Gilman@vermont.gov>

Sent: Thursday, October 12, 2023 5:11 PM

To: Genevieve E. Kaplan <gek@stateside.com>

Subject: Re: Rule 5

Hi there. Yes, the rules met with the Committee's approval, and the adopted rule has been filed with an effective date of 10/21. Just holler if you need copies of the filings. Thanks!

From: Genevieve E. Kaplan <gek@stateside.com>
Sent: Thursday, October 12, 2023 4:49:41 PM
To: Gilman, Gabriel <Gabriel.Gilman@vermont.gov>
Subject: RE: Rule 5

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Good afternoon Mr. Gilman,

I wanted to follow up with you and see if LCAR objected to Rules 1, 2, and 4 at the October 5 meeting or if they will become effective shortly. I couldn't find any minutes for the LCAR meeting on their website. If the rules were not objected to, is the effective date already set?

Thank you for your help,

Genevieve Kaplan

Regulatory Associate

Stateside Associates

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From: Gilman, Gabriel <Gabriel.Gilman@vermont.gov>
Sent: Thursday, September 21, 2023 4:11 PM
To: Genevieve E. Kaplan <gek@stateside.com>
Cc: CCB - Compliance <CCB.Compliance@vermont.gov>; McCarty, Denise <Denise.McCarty@vermont.gov>
Subject: Fw: Rule 5

Ms. Kaplan:

Thanks for your question. Lexis maintains Vermont's official Administrative Code [here](#). It's useful for details that agency sites sometimes omit, including effective dates and Secretary of State rule log numbers. Details for the Board's four adopted rules are as follows:

- Rule 1, eff. March 29, 2022; Secretary of State Rule Log #22-008
- Rule 2, eff. March 29, 2022; Secretary of State Rule Log #22-009
- Rule 3, eff. April 19, 2022; Secretary of State Rule Log #22-014
- Rule 4, eff. April 19, 2022; Secretary of State Rule Log #22-015

The agency has proposed amendments to Rules 1, 2, and 4, and the notice and comment period is now closed. The proposed rule amendments will go before the Legislative Committee on Administrative Rules on [October 5](#). There is a statutory 15-day holding period before rules may take effect. Assuming the Committee has no objections, anticipate an effective date between October 20 and November 1.

In 2022, the Board's pre-filing of Rule 5 met with unexpected controversy, and the text never was filed as a proposed rule with the Secretary of State. The agency is aware of the need to adopt a member-removal rule, and we intend to promulgate a new proposal when the current round of rulemaking is finished.

Don't hesitate to call if you have questions.

Thanks,
Gabe

Gabriel M. Gilman
General Counsel

Vermont Cannabis Control Board
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(m) 802.261.1510
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CANNABIS CONTROL BOARD

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From: Genevieve E. Kaplan <gek@stateside.com>
Sent: Thursday, September 21, 2023 2:03 PM
To: CCB - Compliance <CCB.Compliance@vermont.gov>
Subject: Rule 5

You don't often get email from gek@stateside.com. [Learn why this is important](#)

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To Whom It May Concern:

I am wondering what the status is of Rule 5 concerning board member approval. I am also wondering what the effective dates were for Rules 1, 2, 3, and 4.

Additionally, I see that 23P011, 23P012, and 23P013 are final-proposed. Which LCAR meeting will the rules be reviewed for adoption?

Thank you for your help,

Genevieve Kaplan
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