

3290

Form Letter A 325-330

DH, MMRegulations

From: John Meyerson <info@ufcw1776.org>
Sent: Sunday, April 4, 2021 11:21 AM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Members of the Independent Regulation Review Commission and Department of Health:

I am submitting public comment in response to proposed Regulation #10-219: Medical Marijuana. The Medical Marijuana Program provides critical relief for thousands of patients across the Commonwealth, sustainable jobs for growers, processors and distributors and an opportunity to pave the way for a new industry in Pennsylvania. I believe it is imperative that employers in this industry are accountable and held to a standard consistent with other industries serving patients in the Commonwealth. It is critical that Pennsylvania get the process right in order to protect the workforce and the future of this industry. As such, my comments are regarding section § 1141.47. **General penalties and sanctions.**

As you are aware, applicants seeking a medical marijuana license submit a comprehensive application detailing their projected plans, financials, diversity plans, impact on the community, and more. Applicants have been able to receive additional points on their application by signing a **neutrality and card check agreement with a labor organization**, agreeing to stay neutral in the attempt to organize the workforce, bringing better wages, benefits and protection to employees in this new industry. With a limited number of licenses available and therefore limited opportunities for employment, it is critical that these employers are being held to such standards when receiving their license.

As such, I am requesting a change to subsection 1141.47 (General penalties and sanctions). I am requesting that the Independent Regulation Review Commission and Department of Health include the following language to ensure that employers comply with the neutrality and card check agreements they submit with their application, giving the employees the opportunity to learn about all of their options and penalize the employer should they be found in violation:

§ 1141.47. General penalties and sanctions. (a)(vi) The medical marijuana organization fails to comply with neutrality and card check agreements and/or other labor peace agreements submitted with the initial application.

This change will permit the Department of Health to enforce the submission of labor peace agreements which are included under "community impact" section of the application and awarded up to 5 additional points for signing. Specifically, this change will permit the Department

to suspend or revoke a license, issue a civil penalty of up to \$10,000 for the violation and an additional penalty of up to \$1,000 a day for each day the violation is not cured or issue a written warning against the license, depending on the gravity of the situation. These are the same penalties provided for all provisions under this section.

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This additional language will permit the Department of Health to ensure that employers are not falsifying their plans to stay neutral on applications in order to receive additional points and eliminate bad actors in this industry. This simple and necessary change will help protect the workforce of an industry that we are still learning how to best operate. Thank you for taking my comments into consideration.

Sincerely,
John Meyerson

Mr. John Meyerson
508 W Mount Airy Ave
Philadelphia, PA 19119
jmeyerson1776@gmail.com
(215) 248-0918

DH, MMRegulations

From: John Tynan <info@ufcw1776.org>
Sent: Monday, April 5, 2021 1:06 PM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Sincerely,
John Tynan

Mr. John Tynan
2017 Rhawn st
Phila , PA 19152
jtynan@ufcw1776.org
267-481-4258

DH, MMRegulations

From: Kevin Nau <info@ufcw1776.org>
Sent: Monday, April 5, 2021 11:36 AM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Sincerely,
Kevin Nau

Mr. Kevin Nau
102 Tudor Dr.
St Clairsville , OH 43950
Knau@ufcw1776.org
412-736-4296

DH, MMRegulations

From: Linda Bello <info@ufcw1776.org>
Sent: Monday, April 5, 2021 11:30 AM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Sincerely,
Linda Bello

Ms. Linda Bello
315 S. Hancock St
Mcadoo, PA 18237
lbello@ufcw1776.org
610-513-9859

DH, MMRegulations

From: Pamela Saunders <info@ufcw1776.org>
Sent: Sunday, April 4, 2021 11:28 AM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Sincerely,
Pamela Saunders

Mrs. Pamela Saunders
431 Harrison Ave
Glenside , PA 19038
Psaunders@ufcw1776.org
6105139959

DH, MMRegulations

From: Sean Hoyt <info@ufcw1776.org>
Sent: Wednesday, April 7, 2021 6:25 PM
To: DH, MMRegulations; brodas@ufcw1776.org
Subject: [External] Public Comment in response to proposed Regulation #10-219

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Sincerely,
Sean A Hoyt

Mr. Sean Hoyt
703 bigler ave
Clearfield , PA 16830
seanhoyt0772@yahoo.com
8145770643

