

Hello, my name is Gina Dubbe', and I am a dispensary owner at Greenhouse Wellness. **I'm one of five women owned dispensaries in Maryland.** Yes, women own less than 5% of the dispensaries in Maryland. Greenhouse was one of the first 10 dispensaries that were licensed. **Sadly, WOMEN ARE NOT REPRESENTED in this legislation.**

I have a number of concerns for your consideration:

1. We won our license in the initial round in 2016 and had our 'hold' period to sell the license extended from two years to three years. And now, with this pending legislation, I cannot sell for five additional years. As a dispensary owner, I don't believe you understand the difficulties in doing business. Sales are down and it is difficult with 280E taxation to make ends meet. Now I'm faced with a significant fee to convert to recreational sales.....10% of my sales gross revenues....not net, but gross. **The fees are going to kill those of us who are independent.** Quite frankly, when the awards were initially made, I likely qualified for more than one license, but couldn't get more than one dispensary according to the program rules. Now MSOs own four dispensaries. In order for me to be competitive, I have no choice but to scramble to find cash to be licensed as recreational or have the ability to exit.

Suggestion: Please consider modifying the regulations to a five-year hold from the inception of the license, providing it has been under the same ownership. This eliminates those who flip licenses and protects those of us who have spent years in support of the program.

2. Correspondingly, I truly do not understand the diversity rules that are proposed. Women are 51% of the population but represent 5% of the MD dispensaries. However, we are now going to set aside hundreds of dispensaries with no allocation for women. **Women are significantly underrepresented, with no consideration.** Further, the legislation is restricting the diversity licenses to those living in areas and specified locations as opposed to true gender or racial diversity. This seems shortsighted and self-serving. This is combined with the fact it is impossible to raise money. A lottery? How about the most qualified wins? You have created a no-win situation for diversity owners. I recognize and understand the good intentions that have gone into this bill however, I do not believe it's going to meet your goals. Women compose 51% of the world and

consumers, however, there's no set aside for diversity at all other than geographic limitations. How fair is this? So, if you don't live in a diversity area, you aren't considered a minority or underrepresented?

Suggestion: Change the diversity status to include minorities and WOMEN who may or may not live in the inclusion areas.

3. In addition, the HB2 winners, which are all diversity, seem to be ignored in this legislation and victims to the changes. When they first bid, the program was delayed significantly; there's no cash set aside for them; and now they're going to be forced to a five-year hold with fees that are MUCH larger than planned. This doesn't seem fair or equitable. Let's look at this logically.

Suggestion: Make accommodations for the HB2 winners as they are all diversity awards.

4. The restriction on selling within five years and limiting owners to 2 dispensaries will only hurt those that you seek to help. In addition, exit options are unavailable if the verticals are capped at two dispensaries. What do you do with those that currently, under existing rules, have four dispensaries?

Suggestion: Those of us that have been here since inception should not be forced to hold another 5 years. Change the rules to 5 years from the inception of the license providing it has been under consistent ownership. Raise the cap from the proposed 2 dispensaries to 4 dispensaries per vertical (as currently exists).

5. Finally, **the canopy cap for growers shouldn't be capped based on canopy in October 2022.** People spent money, in good faith, to increase their size. Cap the canopy for growers at whatever they had when this legislation is passed. Only then are you not penalizing folks for investing in the program.

Suggestion: Growers will be capped to the amount of canopy when the session is ended.

I would be happy to discuss any of this with you or take you on a tour of our dispensary in Ellicott City. Thank you for your time.