

Hello all,

Thank you for having me here today. My name is Moranda Bromberg and I am here to speak on behalf of my farm, Hudson Valley Herbals, located in Ellenville, NY. We are a woman owned and operated business and a SEE applicant. We recently submitted our adult use processor application as well.

Today, I speak for fellow women SEE applicants, who are new to the market, but who anticipated applying in this current window for cultivation licenses. For years we planned and waited for the application window, and last month were shocked when additional guidance from the board was released on September 29th. This Licensing Application FAQ contained critical guidance which informed us for the first time that mixed light, outdoor, or combination license types would be disallowed in the October 4 application window. This unexpected information contradicted what was communicated to us by the office throughout this arduous process.

I resigned from my prior career in 2021 to focus full time on this business and invested significant personal capital into it. These past few years we have all patiently waited out lawsuits, attended virtual board meetings, applied for educational initiatives, critically read every control board and OCM publication, sent in public comments, and have been writing, researching, and collaborating with industry counterparts to create a winning business plan.

Until September 29, the guidance provided by the OCM stated that applications would be scored on a number of factors including social equity, community involvement, environmental and energy plan, economics of the applicant's municipality, and other key factors. It also seemed to allow applicants to apply for the full range of cultivation and tier types. Like many, we spent over a year building our business plan and application materials, as well as conceptualizing our physical site,

relying on the OCM's guidance. The current portal however provides no option to upload additional materials to bolster our application so these details won't be seen by the board.

We are ready to continue investing significant capital and energy into our beloved town. We want to hire employees, purchase our property, reassure investors, and budget our business – all of which is difficult to do without a reliable process and a realistic timeline from the state. I counted on the head start the OCM promised SEE applicants just like me. However, these changes make that reality seem less likely. The farm site we have optioned, in a historically agricultural community, sits just down the road from the future site of Cresco Labs' New York mega-facility. We have done everything right by the standards set in the legislation and regulations and even so, Cresco will be able to operate and establish itself before we will. We were told sustainability, community impact, and social equity would be a focus of the state. And yet, a fully indoor, multi-national corporate operator will be able to operate far in advance of us. How is this in line with the stated values of the control board and OCM?

While we appreciate the efforts put into the newest guidance, the degree of changes required significantly more time for applicants to adjust than was afforded. Like thousands of others, we are frustrated with how long it has taken to roll out the legal market for cultivators, processors, dispensaries, and consumers. We want the process expedited.

I hear the struggle and frustrations of the conditional license holders, and I am glad the state has taken action to support those farmers. But there are many current and would-be farmers who never got the chance to grow hemp, and who are being left behind now. Those in our position have been told, once again, to wait and see.

There are many hardworking and experienced applicants who have not had the opportunity to present their plans to the board. There are many

applicants, like me, who deserve access and a chance to apply now as they intended, so we too can be a part of the NY cannabis market.

Thank you for your time and attention.