

Testimony in Support of SB 195  
March 8<sup>th</sup>, 2023  
Senate Commerce & Labor  
Green Life Productions  
1205 South Loop Road  
Pahrump, NV  
Presented by Kouanin Cantwell  
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Good morning, Chairwoman Spearman, and committee members. My name is Kouanin Villa, and I am an owner of Green Life Productions, a small family-owned cannabis farm located in Pahrump, Nevada. I am here to testify in support of SB 195.

Green Life Productions is one of the very first legal cannabis farms to open in Nevada and we grow sustainable, high-quality cannabis for over 8 years using a biodynamic no till soil process that reduces waste, conserves water, and eliminates the need for pesticides and fertilizers.

I am proud to share that our small family farm is currently on our 32<sup>nd</sup> harvest using our soil and we have an almost perfect pass rate using licensed third-party testing labs. We are proud of our process, our commitment to sustainability and waste reduction, and ultimately, our safe, high quality medical grade cannabis flower.

Our small family farm has used FDA and USDA supported growing methodology from the beginning and have been regulated by three different state agencies, beginning with the Department of Health & Human Services, transitioning to the Department of Taxation, and now under the Cannabis Compliance Board. We have been recognized as a model facility by past agencies and have even provided training for agency staff over the years. In the past, we would have characterized our relationship with state regulators as cooperative and supportive,

learning and sharing together to create the best industry for legal cannabis in the country. But that began to change with the CCB in October of 2021.

During a routine inspection of our facility, new CCB agents unfamiliar with our small family farm's growing methodology, began making claims about our process that were like nothing we had heard before. False claims about the safety of our process have been the hardest to reconcile – we grow in undisturbed, biodynamic soil with worms and beneficial insects, and companion plants, just like in nature. We have been forced to defend 8 years of methodology with a 99% independent lab pass rate. We have been through months and months of consultations, meetings, and the updating of our standard operating procedures with the state. And to be clear, we were prepared once again to help educate our regulators along the way.

In addition to the meetings and consultations required to defend our small family farm's growing process, the CCB spent 100s of hours of research on cultivation science and federal agricultural and safety standards that already support our growing process. The CCB then sends us bills for all of their time spent researching or meeting with us. These bills – and I have copies I can share – will often be large blocks of time with vague entries. One included a 75-hour entry for “work ongoing.” That time alone cost us \$8,325. In total, we've paid the CCB approximately \$47,000 in time and effort fees since the October 2021 inspection.

We have no choice to pay these bills, or our licenses will not be renewed. And there is no appeal process for time and effort bills if you think you've been overcharged.

And what have all these Time & Effort bills from the CCB accomplished? We have arrived right back where we started, which is the approved continuation of our family farms methodology that we have used for 8 years. When you add in the cost of attorney's fees and consultants to assist us with our communications with the CCB, we have spent over \$100,000.

I also want to share that our family owns an organic farm in Pahrump, Green Life Produce, and that our relationship with the other state agencies like the Department of Agriculture, DHHS, and the Division of Water Resources have been far more supportive, and we received no bills for those conversations and sharing of information.

We believe that small businesses should not be required to pay for the regulatory agency overseeing them to research and learn about the industry they are tasked with regulating, nor should these businesses have to pay to meet with or speak with state agencies in a spirit of cooperation. We respectfully ask for your support of SB 195.