



## PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with [RCW 34.05.330](#), the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Peter Manning  
Name of Organization Black Excellence In Cannabis  
Mailing Address 220 Ferndale Ave NE  
City Renton State WA Zip Code 98056  
Telephone (253) 453-7318 Email peter@blackexcellenceincannabis.org

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClist.htm>.

### INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: Washington State Liquor Cannabis Board

**1. NEW RULE - I am requesting the agency to adopt a new rule.**

The subject (or purpose) of this rule is: \_\_\_\_\_

The rule is needed because: \_\_\_\_\_

The new rule would affect the following people or groups: \_\_\_\_\_

**2. AMEND RULE - I am requesting the agency to change an existing rule.**

List rule number (WAC), if known: \_\_\_\_\_

I am requesting the following change: \_\_\_\_\_

This change is needed because: \_\_\_\_\_

The effect of this rule change will be: \_\_\_\_\_

The rule is not clearly or simply stated: \_\_\_\_\_

**3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

List rule number (WAC), if known: 314-55-570 1 line (j) & (5) \_\_\_\_\_

*(Check one or more boxes)*

It does not do what it was intended to do.

Please read attachment

It is no longer needed because: \_\_\_\_\_

Please read attachment

It imposes unreasonable costs: \_\_\_\_\_

The agency has no authority to make this rule: \_\_\_\_\_

It is applied differently to public and private parties: \_\_\_\_\_

It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: \_\_\_\_\_

It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: \_\_\_\_\_

Please read attachment

Other (please explain): \_\_\_\_\_

### **3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

**It does not do what it was intended to do.**

**It is no longer needed because:**

The only reason Certificate Holders became part of the Social Equity Program was because Certificate Holders paid a lobbyist to push the agenda for them. Certificate Holders should not benefit off the backs of the Black and Brown communities affected by the War on Cannabis. Certificate Holders will dilute the Social Equity Program. Certificate Holders have never advocated for Social Equity in Cannabis, but yet they are looking benefit off the backs of Black and Brown communities pain and trauma

**It imposes unreasonable costs:**

Certificate Holders will dilute the value of true Social Equity Licensees. This will create a devalued market for Social Equity Retail Licensees. Social Equity Licensees many of whom are Cannabis Pioneers have lost millions of wealth the past 10 years by getting cut out of the legal market.



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### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Mike Asai  
Name of Organization Emerald City Collective  
Mailing Address 2815 Elliott Ave Suite 100  
City Seattle State WA Zip Code 98121  
Telephone (206) 581-6640 Email emeraldcitycollective@gmail.com

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClist.htm>.

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Agency responsible for adopting or administering the rule: Washington State Liquor Cannabis Board

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The subject (or purpose) of this rule is: \_\_\_\_\_

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I am requesting the following change: \_\_\_\_\_

This change is needed because: \_\_\_\_\_

The effect of this rule change will be: \_\_\_\_\_

The rule is not clearly or simply stated: \_\_\_\_\_

**3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

List rule number (WAC), if known: 314-55-570 1 line (j) & (5) \_\_\_\_\_

*(Check one or more boxes)*

It does not do what it was intended to do.

Please read attachment

It is no longer needed because: \_\_\_\_\_

Please read attachment

It imposes unreasonable costs: \_\_\_\_\_

The agency has no authority to make this rule: \_\_\_\_\_

It is applied differently to public and private parties: \_\_\_\_\_

It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: \_\_\_\_\_

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Please read attachment

Other (please explain): \_\_\_\_\_

July 30th, 2024

WSLCB Washington State Department of Commerce  
1011 Plum St SE  
Olympia, WA 98504

Subject: Social Equity in Cannabis Program (SSB 5080)

Rules Committee,

I am writing to express our deep concerns regarding the continued inclusion of Certificate Holders in the Social Equity Program. This program was specifically designed to address the historical injustices and systemic disparities faced by Black and Brown communities due to the War on Cannabis. Allowing Certificate Holders to benefit from this program (SB5080) undermines its very purpose and disrespects the trauma and struggles these communities have endured.

Certificate Holders do not represent the victims of the War on Cannabis. Instead, they are individuals and entities who have leveraged their resources to lobby for inclusion in a program they never truly supported. By paying lobbyists to advocate for their inclusion, Certificate Holders have effectively bypassed the fundamental intentions of the Social Equity Program, which aims to create opportunities for those directly impacted by the criminalization of Cannabis.

It was never the Legislative intent to reward Certificate Holders by allowing them to benefit from the Social Equity Program. The intention has always been to rectify the injustices suffered by Black and Brown communities, not to extend benefits to those who have not experienced the same level of systemic harm and disenfranchisement.

The participation of Certificate Holders in this program will undoubtedly dilute and devalue the Social Equity Retail licenses. These licenses are meant to empower and uplift Black and Brown communities, providing them with opportunities for economic advancement and restorative justice. Including Certificate Holders, who do not share the same history of oppression and disenfranchisement, compromises the integrity and effectiveness of the program.

It is imperative that we remain steadfast in our commitment to true Social Equity. To achieve this, we must ensure that the benefits of the Social Equity Program are reserved exclusively for those who have been historically marginalized and harmed by Cannabis prohibition. Allowing Certificate Holders to participate not only contradicts this mission but also perpetuates the very inequities we seek to eliminate.

We urge you to take immediate action to remove Certificate Holders from the Social Equity Program. By doing so, we can honor the resilience of Black and Brown communities and uphold the principles of justice and equity that this program was founded upon.

Thank you for your attention to this critical matter. We look forward to your prompt response and action.

Sincerely,

Mike Asai  
President  
Emerald City Collective





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### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Elijah Henry  
Name of Organization \_\_\_\_\_  
Mailing Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Telephone \_\_\_\_\_ Email henry.elijah314@gmail.com

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClist.htm>.

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Agency responsible for adopting or administering the rule: Washington State Liquor Cannabis Board

**1. NEW RULE - I am requesting the agency to adopt a new rule.**

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The rule is needed because: \_\_\_\_\_

The new rule would affect the following people or groups: \_\_\_\_\_



**2. AMEND RULE - I am requesting the agency to change an existing rule.**

List rule number (WAC), if known: \_\_\_\_\_

I am requesting the following change: \_\_\_\_\_

This change is needed because: \_\_\_\_\_

The effect of this rule change will be: \_\_\_\_\_

The rule is not clearly or simply stated: \_\_\_\_\_

**3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

List rule number (WAC), if known: 314-55-570 1 line (j) & (5) \_\_\_\_\_

*(Check one or more boxes)*

It does not do what it was intended to do.

Please read attachment

It is no longer needed because: \_\_\_\_\_

Please read attachment

It imposes unreasonable costs: \_\_\_\_\_

The agency has no authority to make this rule: \_\_\_\_\_

It is applied differently to public and private parties: \_\_\_\_\_

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Please read attachment

Other (please explain): \_\_\_\_\_

July 30th, 2024

WSLCB Washington State Department of Commerce

1011 Plum St SE

Olympia, WA 98504

Subject: Social Equity in Cannabis Program (SSB 5080)

Rules Committee,

I am writing to express our deep concerns regarding the continued inclusion of Certificate Holders in the Social Equity Program. This program was specifically designed to address the historical injustices and systemic disparities faced by Black and Brown communities due to the War on Cannabis. Allowing Certificate Holders to benefit from this program (SB5080) undermines its very purpose and disrespects the trauma and struggles these communities have endured and suggest that this program is “separate but equal” much like the Jim Crow era.

Certificate Holders do not represent the victims of the War on Cannabis. Instead, they are individuals and entities who have leveraged their resources to lobby for inclusion in a program they never truly supported and frankly, isn't applicable by the title of the program. How is it socially equitable for someone who is already in the industry to ride the coattail of this social initiative when not enduring the injustices of black and brown communities since the era of the war on drugs? By paying lobbyists to advocate for their inclusion, Certificate Holders have effectively bypassed the fundamental intentions of the Social Equity Program, which aims to create opportunities for those directly impacted by the criminalization of Cannabis.

It was never the Legislative intent to reward Certificate Holders by allowing them to benefit from the Social Equity Program. Why is this all of a sudden changing? The intention has always been to rectify the injustices suffered by Black and Brown communities, not to extend benefits to those who have not experienced the same level of systemic harm and disenfranchisement.

The participation of Certificate Holders in this program will undoubtedly dilute and devalue the Social Equity Retail licenses. These licenses are meant to empower and uplift Black and Brown communities, providing them with opportunities for economic advancement and restorative justice. Including Certificate Holders, who do not share the same history of oppression and disenfranchisement, compromises the integrity and effectiveness of the program.

It is imperative that we remain steadfast in our commitment to true Social Equity. To achieve this, we must ensure that the benefits of the Social Equity Program are reserved exclusively for those who have been historically marginalized and harmed by Cannabis prohibition. Allowing Certificate Holders to participate not only contradicts this mission but also perpetuates the very inequities we seek to eliminate.

We urge you to take immediate action to remove Certificate Holders from the Social Equity Program. By Doing so, we can honor the resilience of Black and Brown communities and uphold the principles of justice and equity that this program was founded upon. Thank you for your attention to this critical matter. We look forward to your prompt response and action.

Sincerely,

Elijah Henry



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### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Paul Brice

Name of Organization Happy Trees

Mailing Address 8507 104th ST SW

City Lakewood State WA Zip Code 98498

Telephone 253-226-2135 Email pbrice168@gmail.com

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClint.htm>.

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Please read attachment

Other (please explain): \_\_\_\_\_

**From:** [Paul Brice](#)  
**To:** [LCB DL Rules](#)  
**Subject:** Title Cert Petition  
**Date:** Friday, August 23, 2024 4:44:28 PM  
**Attachments:** [Happy Trees Petition.pdf](#)

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External Email

8/18/2024

WSLCB Washington State Department of Commerce  
1011 Plum St SE  
Olympia, WA 98504  
Subject: Social Equity in Cannabis Program (SB 5080)

Rules Committee,

We are writing this to bring attention to concerns regarding the inclusion of Certificate Holders in the Social Equity Program.

SB5080 was specifically made to combat the injustices inflicted on minorities as a result of the War on Cannabis. Allowing Certificate

Holders to make use of the program directly opposes the goals of the program which is to provide opportunities for those who were negatively affected by the criminalization of cannabis.

Certificate Holders have not been directly impacted by the War on Cannabis, yet they have been able to use the Social Equity Program as a way to take advantage of the opportunities made for qualifying Social Equity applicants.

The purpose of the program was to provide benefits to minorities who faced injustices and inequality, not to Certificate Holders who have not experienced the same.

Allowing Certificate Holders in this program will take away from the mission of the program, to uplift minorities and the community by bringing in revenue, jobs, and opportunities for success in an industry which had previously treated minorities so poorly.

Social Equity is about bringing resources to a specific group of people who were not given the same opportunities as others. Providing a marginalized group with a more equal footing so they may have the opportunity to compete for the same goals as someone who

wasn't facing the same injustices. Allowing for Certificate Holders to participate is in opposition of the entire idea of Social Equity, as

Certificate Holders were not at a disadvantage because of the War on Cannabis so should not be provided with the benefits of the program designed for those who were at a disadvantage. In order for this program to be truly successful the benefits must be used only

for people who have faced the injustices of the War on Cannabis.

In order to uphold the mission and goals of the Social Equity Program we are asking for immediate exclusion of Certificate Holders from the program.

We appreciate your time and attention on this matter and look forward to hearing back from

you.

Thank You,

Paul Brice



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### CONTACT INFORMATION *(please type or print)*

Petitioner's Name \_\_\_\_\_

Name of Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Telephone \_\_\_\_\_ Email \_\_\_\_\_

### COMPLETING AND SENDING PETITION FORM

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- Provide relevant examples.
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- Attach additional pages, if needed.
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Agency responsible for adopting or administering the rule: \_\_\_\_\_

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The rule is needed because: \_\_\_\_\_

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**3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

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*(Check one or more boxes)*

It does not do what it was intended to do.

It is no longer needed because: \_\_\_\_\_

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Other (please explain): \_\_\_\_\_

**From:** [Ricky Lee](#)  
**To:** [LCB DL Rules](#)  
**Subject:** Social Equity Program  
**Date:** Tuesday, September 17, 2024 11:20:26 AM  
**Attachments:** [Lee Petition.pdf](#)

---

External Email

September 17 2024

WSLCB Washington State Department of Commerce  
1011 Plum St SE  
Olympia, WA 98504

Subject: Social Equity in Cannabis Program (SSB 5080)

Rules Committee

I am writing to express my deep concerns regarding the continued inclusion of Certificate Holders in the Social Equity Program. I feel this program was specifically designed to address the historical injustices and systemic disparities faced by Black and Brown communities due to the War on Drugs including Cannabis. Allowing Certificate Holders to benefit from this program (SB5080) undermines the intent is a slap in the face and disrespects the trauma and struggles these communities have endured.

Certificate Holders do not represent the true victims of the War on Cannabis. Instead, these individuals and entities who have leveraged their resources to lobby for inclusion in a program never meant for them. These Certificate Holders have bypassed the fundamental intentions of the Social Equity Program which was created to provide opportunities for those directly impacted by the criminalization of Cannabis.

We urge you to take immediate action to remove Certificate Holders from the Social Equity Program. By doing so, we can honor the resilience of Black and Brown communities and uphold the principles of justice and equity that this program was founded upon.

Thank you for your time and consideration

Regards

Ricky Lee

Essential Lee Cannabis  
Owner