



# 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 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>.

### 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): \_\_\_\_\_

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