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Thursday, July 11, 2019

Six Nations Cannabis Commission
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HAND DELIVERED

Dear Commissioners,

According to the Six Nations Cannabis Law, the General Mandate of the Six Nations Cannabis Commission is to administer the Law *"in the best interests of the people of Six Nations and in accordance with the highest principles of health, safety, security, honesty and integrity"*.

We believe it is our duty as Commissioners, to formally oppose the way the Commission has been pressured to accept the [REDACTED] proposal for a research and development permit — and to formally appeal the vote on it's approval during our July 8 afternoon meeting.

According to the Cannabis Law, Section 8.3 *"applicants must be members who are resident in Six Nations and are over the age of nineteen (19) years."*

To date, the Commission has not seen an application from [REDACTED] or identification confirming her age, band membership, residency, or other required information needed to approve a permit under the current regulations — including a criminal record check, proof of liability insurance, disclosure of who her business partners are or evidence of [REDACTED] purported federal licenses.

Individuals, business owners or corporations wanting to get a permit must submit a business plan outlining how their proposal meets or exceeds Six Nations Cannabis Law, federal or provincial expectations. To date we have received a business proposal from the [REDACTED] however it does not satisfactorily accomplish that task.

According Section 26 of the Cannabis Law, the Commission is responsible to provide recommendations to SNEC to approve amendments to the Cannabis Law: including any and all

forms, permits, categories of permits, requirements of permit holders and total number of permits being issued.

It is reflected in the minutes from June 27 that a Research and Development permit was being sought by the [REDACTED]. As a Commission we discussed and all agreed this permit needed to be added to the law first before we could qualify the [REDACTED]. All Commission members agreed to make the recommendation to SNEC to add an R&D permit. Once that was approved, our application package finalized and fee payment details confirmed — then [REDACTED] could go through the proper channels to put forward her application.

We have not yet recommended any of our proposed amendments to the law. We are scheduled to bring those to SNEC on July 22, 2019.

On July 8, during a discussion over what was to take place with the [REDACTED] application — Commissioner Wyman said the permit was no longer a Research and Development permit but a Standard Cultivation permit. He said this was because of harmonization and said “federally there is no R&D license”.

In fact, according to federal regulations there are two different research and development permits — analytical testing and research — and both of them prohibit the holder from selling cannabis to persons without a federal license.

We believe that Commissioners Hill, Wyman and Miller have full knowledge of the Six Nations Cannabis Law and understand the requirements for a person to be issued a permit.

We do not believe Commissioners Hill, Wyman and Miller acted in fairness or in the best interests of the community in voting yes on July 8 to approve the [REDACTED] proposal.

We believe the decision to approve the proposal was contrary to the Cannabis Law. We submit this formal appeal and recommend the vote be rendered illegal, null and void.

This recommendation does not reflect prejudice toward [REDACTED] current proposal or any further application submitted by her provided she be given the same due date, form, reporting standards and requirements as any other potential applicant.

Following the vote, Commissioner Wyman asked Commissioner Garlow to write a letter and design a permit to issue to the [REDACTED] right away. Commissioner Garlow did not write the letter or design a permit.

In text messages to Commissioner Garlow on July 10 and via group emails on July 11 Commissioner Wyman confirmed that he had given the [REDACTED] a letter informing them their proposal had been approved. To our knowledge, he did not confirm, share, seek approval or disclose the contents of that letter to the Commission in any form. It does not appear on our shared Dropbox.

It is reckless for the Commission to approve permits at this time, whether whole or in part. This compromises the integrity our work, and puts the development of the local industry at risk.

Additionally as Commission members of the regulatory body that is overseeing cannabis on Six Nations it is required of us to uphold the law. During a June 26 site tour of the facility where the [REDACTED] are proposing to work, we observed several cannabis extract products being made. Every item that we saw is prohibited by federal law through to October 17, 2019.

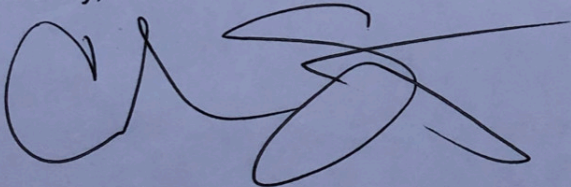
We were told by members of the [REDACTED] that they possess a federal license. They did not disclose what kind of license they hold nor was it shown to us. Regardless, possessing a federal licence does not permit cannabis activity on Six Nations. According to the Cannabis Law Section 9, "a licence issued by a regulatory authority outside of the Territory for application on Six Nations lands has no validity within Six Nations."

Without a valid permit from the Commission, we all observed the [REDACTED] producing federally prohibited cannabis products in violation of both Canadian regulations and the Six Nations Cannabis Law.

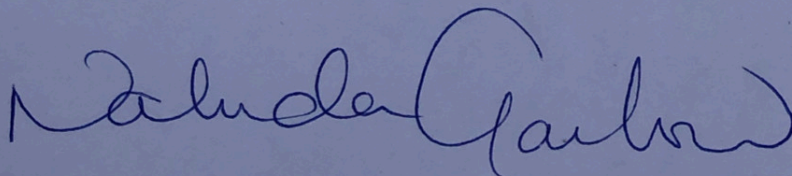
That factor has to be applied to both the current proposal and any forthcoming proposals from the business owners, [REDACTED] or [REDACTED] herself as the applicant.

Despite Commissioner Hill discouraging a reporting relationship with the Six Nations Police or to document what the Commission saw at the [REDACTED] facility in the minutes, our observations have now been documented and the Six Nations Police Drug Enforcement Unit has been informed. Not documenting and reporting this would be unethical and a violation of our duties as Commissioners of a regulatory body.

Sincerely,



Cole Squire, Commissioner
Six Nations Cannabis Commission



Nahnda Garlow, Commissioner
Six Nations Cannabis Commission

Cc: Six Nations Elected Council