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The Department of Cannabis Control
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October 16, 2021

It has come to our attention that during the public comment period for the DCC emergency rulemaking, the International Cannabis Farmers Association submitted, as a part of their formal comments, a historic position paper that our organizations (SCGA and TCAA), and each of us personally as authorized representatives of our organizations, signed onto in April of 2020. The opening statements of the ICFA comments make reference to the attachment and refer to the signatories of the attachment as current “coalition partners”. This document is attached for your reference.

There was no outreach from the International Cannabis Farmers Association to either of us personally, or to our organizations, regarding their intent to submit this historic document as a part of their comments for this rulemaking. As such, our organizations did not have the opportunity to review the comments prior to submission, nor did we grant permission to include our organizations logos or our personal signatures as an indication of endorsement of the ICFA comments on the DCC rulemaking.

To be clear, our organizations are not currently affiliated with the ICFA in any way. Our organizations are both formally partnered with the Origins Council to advocate on state policy matters. We submitted our comments on the DCC emergency rulemaking with the Origins Council on September 30th. That submission is attached for your reference.

Mr. Keys, who is no longer either a dues-paying member or board member, requested by email that his name and image be removed from their website on March 18, 2021. He received no reply.

We have copied Kristin Nevedal, the Board Chair for the International Cannabis Farmers Association; Board Member of the California Cannabis Industry Association; [DCC Cannabis Advisory Committee Member](#); Program Manager of the Mendocino County Cannabis Program.

Sincerely,



Joanna Cedar
Board Member and Policy Committee Chair
Sonoma County Growers Alliance



Adrien Keys
President
Trinity County Agriculture Alliance