

Dear Chair Pepper and Members of the Cannabis Control Board,

We are writing to you as the visionaries and co-founding members of a proposed Vermont cannabis producer cooperative — Chris Lillie, Marissa Dunn, and Sara Farnsworth. Together, we are working to organize a compliance-centered cooperative model designed to support licensed cultivators and manufacturers in Vermont's adult-use market.

We are reaching out now because there is a growing sense of urgency among small and mid-scale producers. Market compression, price instability, and increasing operational costs are placing significant strain on local operators. Without structural tools that allow collaboration within the regulatory framework, many Vermont businesses face difficult sustainability challenges in the coming year.

Our cooperative model is designed to strengthen — not circumvent — the regulatory system you have built. The intent is to:

- Share marketing coordination among licensed producers
- Streamline processing and logistical infrastructure
- Pool administrative and compliance resources
- Maintain full Cannabis Control Board oversight

However, we have encountered ambiguity regarding whether licensed cannabis establishments may organize under Vermont's Cooperative Marketing Act (Title 11, Chapter 7, Subchapter 2). While cannabis is cultivated similarly to other agricultural products, it exists under a distinct regulatory framework in Title 7, and the statute does not clearly contemplate our industry.

This uncertainty is creating hesitation at a moment when producers urgently need clarity to make responsible business decisions for the 2026 season.

As women organizing this effort in what has historically been a male-dominated industry, we are especially committed to building collaborative, locally rooted infrastructure that reflects Vermont's cooperative values. We believe this model can enhance compliance, reduce market consolidation pressures, and improve economic resilience — but only if it is clearly permissible within Vermont's regulatory framework.

We respectfully request guidance from the Board on the following:

- Whether the Cooperative Marketing Act may be interpreted to include licensed cannabis establishments; or
- Whether legislative clarification would be necessary to authorize such a structure; and
- What compliance considerations the Board would expect to see addressed in any cooperative model.

Our goal is to build this correctly, transparently, and in partnership with regulators. We would welcome the opportunity to meet with the Board or staff to discuss the concept in more detail

and to ensure that any structure developed aligns fully with the Board's authority and public policy objectives. Currently we seek a WHOLESALE license, and eventually would seek retail when the window opens again.

Thank you for your leadership and for your continued commitment to a stable and well-regulated marketplace. We look forward to your guidance.

Respectfully,

Chris Lillie, Green Mountain Sativa CLTV0378

Marissa Dunn, Altitude Drops MANU0017

Sara Farnsworth, Full Circle Farm CLTV0250