



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 John Kingsbury
Name of Organization _____
Mailing Address 120 State Ave NE, #307
City Olympia State WA Zip Code 98501
Telephone 206-618-0576 Email ajkingsbury@hotmail.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/RClst.htm>.

INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: Liquor and 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: 314-55-020, 314-55-080

- I am requesting the following change: Currently, the following rules seem to offer no clear path for LCB to revoke a medical endorsement in the absence of voluntary and affirmative action by the licensee.
- This change is needed because: There are too many licensees holding medical endorsements they are not meeting the requirements for, and actually removing those endorsements is unduly burdensome.
- The effect of this rule change will be: To save everyone a lot of work. To make adherence to the standard more clear.
- 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: _____

(Check one or more boxes)

- It does not do what it was intended to do.
- It is no longer needed because: _____
- 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: _____
- Other (please explain): _____

From: [John Kingsbury](#)
To: [Kildahl, Jeff \(LCB\); LCB DL Rules](#)
Subject: Fw: zombie medical endorsements
Date: Saturday, February 18, 2023 11:27:59 AM

External Email

Rules.

Please add this email thread to my petition to create a path for non-voluntary removal of retail medical cannabis endorsements.

I feel it describes the problem and why rules are needed.

Thank you.

John Kingsbury

From: John Kingsbury <ajkingsbury@hotmail.com>

Sent: Saturday, February 18, 2023 11:22 AM

Subject: Re: zombie medical endorsements

Ms. McShane,

Add to that:

[Have a Heart - Skyway license #415333.](#)

Complaint 10/23, 11/15 compliance officer reported manager intent to withdraw endorsement and gave instructions about how to withdraw.

1/28 asked about status of withdrawel. As of 2/3 received email from LCB telling me they have not received a request for withdrawel.

[T Brothers Lodge license # 414002](#)

This complaint actually is not that old, but while I have you on the line.

Filed 12/20. 1/6 received notice from Officer Duncan that T Brothers expressed intent to withdraw endorsement. Issued NTC

[Westside 420 license # 412466.](#)

Again, not that old, but I will add it.

Complaint filed 10/31. 11/15 Officer determined not compliant. Advised how to remove endorsement. 1/28 I made an inquiry. 1/30 I received a response telling me the licensee intended to remove the endorsement.

That should do it for these complaints.

Thank you.

John Kingsbury

From: John Kingsbury

Sent: Friday, February 17, 2023 10:16 PM

To: McShane, Jeanne (LCB) <jeanne.mcshane@lcb.wa.gov>

Cc: david.postman@lcb.wa.gov <david.postman@lcb.wa.gov>; Garza, Rick J (LCB) <rick.garza@lcb.wa.gov>

Subject: zombie medical endorsements

Ms McShane,

I wanted to follow-up on some endorsements that just will not seem to die, and I am hoping you can offer a way to clean them up off the list.

Cannabis & Glass. licenses 360307, 428760, 82587.

These stores have been telling me since 2018 that they are not endorsed and do not offer any of the services required to maintain an endorsement.

On 12/30 Grant Smith told me they are opting to have their endorsements removed. They are still on the LCB medically endorsed list.

Cannablyss license 415575. Filed a complaint. On 11/11 Officer Bussman reported Cannablyss filed a request to remove endorsement. Further inquiries have received no response. They are still on the list.

Floyd's license #422049 & 430798

Bussman reported on 11/18 the Sedro Wooley store requested to have their endorsement removed. It is still on your list. Something about they cannot find the owner?

11/15, Mark Duncan reported he determined that they are not meeting the requirements for holding an endorsement, otherwise, my further inquiries elicit crickets.

Ganja Goddess license 413558. On 11/07 Michael Smith reported the store is closed. During January, I tracked (at least one of) the owners down in California where he lives. Apparently Ganja Goddess is a chain down there. His response was "Fuck Washington. I am not going to deal with it." I took a photo of the store front on January 13 at 4:00 pm. They are definitely closed.

Western OG license # 431327 I filed a complaint on 12/22. As of 2/6 Michael Smith told me he hasn't had time to look at it. I reported I doubted there had ever been a store there. Mr.

Smith believed there was. I took a photo of the store (a non-descript door) on January 13 at 3:30. The only signage is a small Buddhist society sign. The door was locked (at 3:30 on Friday). I requested a business license history from the city of Seattle. They have no record of a 502 store there. The building does have an interesting history, though. Apparently, it began as a horse stable, which became an auto garage during the 1920's. Imagine driving your Model T up and down those slippery brick Doc Maynard- designed streets. The UBI number was also attached to an American Mary in Ballard. It appears American Mary has engaged in some musical chairs license numbers game. I called the two Mary stores, both denied being endorsed or providing the services. One said it 'used to'. Out of curiosity, I will do a records request on the floor plan inspection. I will be amazed if there was ever a store at 2114 Western.

These represent stores about where there seems to be no dispute, but their endorsements will not seem to go away.

I would like to get through them so I can get through my "no response" list, my "LCB unwilling to enforce" list, and the "admits they are not, and will not, meet all the requirements (read: not issue recognition cards) yet want to keep the endorsement anyway" list.

Can you show me a path here?

Thank you.

John Kingsbury