

OMAHA TRIBE OF NEBRASKA
CANNABIS REGULATORY COMMISSION
COMMERCIAL APPLICATION PACKET

PART 1 – GENERAL INSTRUCTIONS (APPLIES TO ALL COMMERCIAL LICENSE TYPES)

1. Authority and Reminder

- a. All licenses are revocable privileges under Tribal law and the Omaha Tribe Cannabis Regulatory Code. They are not property rights.
- b. By submitting an application, you consent to investigation, inspections, background checks, and requests for supplemental information by the Cannabis Regulatory Commission (the "Commission").

2. Who May Apply

- a. Natural persons (21 years or older).
- b. Business entities formed under Tribal, state, or federal law, including corporations, LLCs, partnerships, and Tribal enterprises.

3. How to Apply

- a. Complete all of the following:
 - i. Form A – General Applicant Information
 - ii. Form B – Ownership and Financial Disclosures
 - iii. Form C – Operations and Compliance Plan
 - iv. Form D – Premises and Security Plan
 - v. License-specific supplements:
 - 1. Form E – Integrated Tribal Enterprise (if applicable)
 - 2. Form F – Cultivation
 - 3. Form G – Processing / Manufacturing
 - 4. Form H – Testing Laboratory
 - 5. Form I – Transport / Distribution
 - 6. Form J – Nursery
- b. Submit completed forms, required attachments, and fees:

- i. In person: _____
- ii. By mail: _____
- iii. By secure portal (if available): _____

4. Fees

- a. There is a non-refundable application fee and a separate license issuance fee if approved.
- b. Annual renewal fees are required to maintain an active license.
- c. Specific fee amounts will be set in a separate Commission fee schedule.

5. Completeness Review

- a. Applications will first be reviewed for completeness:
 - i. All required forms are signed.
 - ii. All required attachments are included.
 - iii. All required fees are paid.
- b. Incomplete applications will result in written notice and a specified time period to cure before administrative closure.

6. Merit-Based Evaluation

- a. The Commission will score and rank applications using published criteria.
- b. No random lotteries will be used for the selection of commercial licensees.
- c. Evaluation factors may include:
 - i. Suitability and integrity of owners and management.
 - ii. Business competence and operational readiness.
 - iii. Strength of compliance systems and written protocols.
 - iv. Tribal Member equity and local hiring plans.
 - v. Community impact and public health protections.

7. Pre-Operational Inspections and Conditional Licenses

- a. No commercial operation may begin until the premises passes pre-operational inspections, including building, fire, security, and inventory systems.

- b. The Commission may issue conditional licenses that require specified conditions to be met before operations may commence.

8. Waiver of Appeal

- a. Filing an application constitutes a waiver of any right to appeal the Commission's licensing decision to any court or administrative body, except as may be expressly allowed under Tribal law.

PART 2 – STANDARD FORMS AND REQUIRED MATERIALS

These forms are required for all commercial license types.

FORM A – GENERAL APPLICANT INFORMATION

1. Applicant Type (check one):
 - a. Individual
 - b. Corporation
 - c. Limited Liability Company (LLC)
 - d. Partnership
 - e. Tribal enterprise
 - f. Other: _____
2. Applicant Legal Name: _____
3. Doing Business As (if any): _____
4. Mailing Address: _____
City/State/Zip: _____
5. Contact Person (Designated Point of Contact)
 - a. Name: _____
 - b. Title: _____
 - c. Email: _____
 - d. Phone: _____
 - e. Physical Address (if different): _____

f. Preferred method of service (check one):

- i. Email
- ii. Physical mail

6. License Category Requested (check all that apply):

- a. Integrated (Vertical) Tribal Enterprise
- b. Cultivation
- c. Processing / Manufacturing
- d. Testing Laboratory
- e. Transport / Distribution
- f. Nursery

7. Statement of Tribal Member Ownership

- a. Percentage of equity held by enrolled Omaha Tribal Members: _____ %

8. Attestations

- a. I attest that all information in this application is true and correct to the best of my knowledge.
- b. I consent to investigation, background checks, and inspections by the Commission.
- c. I understand that any license issued is a revocable privilege under Tribal law.

Signature: _____ Date: _____

FORM B – OWNERSHIP, CONTROL AND FINANCIAL DISCLOSURES

1. Ownership Structure

- a. Attach an organizational chart showing all direct and indirect owners, including:
 - i. All persons or entities with 5 percent or more ownership or profit interest.
 - ii. All officers, directors, managers, and managing members.
 - iii. Any parent or holding companies.

2. Owner and Key Person Disclosures

For each owner (20 percent or more), officer, director, manager, or managing member, provide:

Commented [AS1]: Consider changing to 20, with key persons changed to 10

- a. Full legal name and any aliases.
- b. Date of birth.
- c. Residential address and contact information including email address.
- d. Citizenship and Tribal enrollment (if applicable).
- e. Role in the business.
- f. Percentage ownership and/or profit interest.
- g. Resume or a CV describing relevant experience of no more than 250 words (business, cannabis, agriculture, manufacturing, compliance, or other regulated industries).
- h. Any prior involvement in regulated industries such as gaming, liquor, cannabis, pharmaceuticals, or others.

Commented [AS2]: include email address

Commented [AS3]: Change to "Resume, CV, or brief summary (no more than 100 words) describing relevant experience...."

3. Background and Suitability Questions

For each owner and key person listed above, answer:

- a. Has the individual ever had a professional, business, or regulatory license denied, suspended, revoked, or subjected to discipline by any tribal, state, or federal authority?
 - i. Yes ☐ No ☐
If yes, attach an explanation.
- b. Is the individual currently involved in any civil lawsuit, administrative action, or regulatory investigation related to business or professional activities?
 - i. Yes ☐ No ☐
If yes, attach an explanation.
- c. Has the individual been charged with or convicted of any felonies in the past ten (10) years?
 - i. Yes ☐ No ☐
If yes, attach certified records and an explanation.
- d. Has the individual ever been an owner, officer, or director of an entity that filed for bankruptcy?
 - i. Yes ☐ No ☐
If yes, attach details.

4. Financial Capacity and Source of Funds

- a. Total project budget: \$ _____
- b. Sources of capital (describe each):
 - i. Equity contributions.
 - ii. Loans (secured or unsecured).
 - iii. Equipment leases.
 - iv. Other sources.

For each material source of funds, provide:

- c. Name of lender or investor.
- d. Amount provided or committed.
- e. Terms (interest rate, collateral, repayment schedule).
- f. Proof of funds (bank statements, letters of commitment, or equivalent).

Disclose any profit-sharing arrangements, options, management agreements, or revenue-participation agreements involving non-owners.

5. Attestation

- a. The applicant certifies that all funding sources are lawful and not derived from criminal activity.
- b. The applicant agrees to promptly notify the Commission in writing of any material change in ownership or financing.

Authorized Signatory: _____ Date: _____

FORM C – OPERATIONS AND COMPLIANCE PLAN (SUMMARY)

Attach written summaries of your standard operating procedures, tailored to your license type, covering at least the following (Note: each section should be no more than 2 pages, 12-point font, single spaced equivalent).

- 1. Security and Access Control
 - a. Procedures for controlling access to the premises.
 - b. Visitor sign-in and escort procedures.
 - c. Employee identification and badging.
 - d. Vault and secure storage controls.

2. Inventory Control and Tracking

- a. System to be used for seed-to-sale tracking.
- b. Process for assigning unique identifiers to plants and products.
- c. Procedures for receiving, transferring, and shipping cannabis and cannabis products.
- d. Frequency and method of inventory reconciliations.
- e. Procedures for reporting diversion, loss, or theft.

3. Sanitation and Facility Maintenance

- a. Cleaning schedules and responsibilities.
- b. Employee hygiene requirements and training.
- c. Pest control program.
- d. Equipment maintenance schedules.

4. Workforce and Training

- a. Hiring plans, including opportunities for Omaha Tribal Members.
- b. Training topics for new hires and ongoing training.
- c. Role-specific training for security, production, quality assurance, etc.
- d. Workplace impairment and substance use policy.

5. Incident and Adverse Event Response

- a. Procedures for handling security incidents, accidents, and injuries.
- b. Product complaint handling.
- c. Product quarantine and recall procedures.

6. Community Compatibility

- a. Odor, noise, and traffic mitigation measures.
- b. Plans for communication with nearby residents or Tribal entities as appropriate.

FORM D – PREMISES AND SECURITY PLAN

1. Site Control

- a. Attach copy of deed, lease, or written authorization demonstrating control of the premises.
- b. Identify whether the property is on trust land, restricted fee land, or other Tribal land status.

2. Premises Description

- a. Physical address: _____
- b. Legal description (attach if needed).
- c. Total square footage: _____ sq ft

3. Floor Plans

- a. Attach scaled floor plans including:
 - i. All rooms and functional areas.
 - ii. Secure areas and vaults.
 - iii. Loading docks and receiving areas.
 - iv. Storage areas.
 - v. Office and administrative spaces.
 - vi. Camera locations and fields of view.
 - vii. Access control points (doors, gates, badge readers).

4. Surveillance and Alarm Plan

- a. Description of video surveillance system, including:
 - i. Number and type of cameras.
 - ii. Coverage areas.
 - iii. Video storage capacity and retention period.
 - iv. Backup power or redundancy.
- b. Description of alarm system, including:
 - i. Entry and motion sensors.
 - ii. Monitoring service, if any.
 - iii. Response protocols.

5. Fire and Life Safety

- a. Fire suppression systems (sprinklers, extinguishers).
 - b. Emergency exits and evacuation routes.
 - c. Fire safety plan, especially for any extraction operations.
6. Environmental Controls
- a. HVAC systems and odor control strategies.
 - b. Waste handling and storage, including hazardous materials and solvents where applicable.
 - c. Water use and discharge plans.

PART 3 – LICENSE-SPECIFIC SUPPLEMENTS

FORM E – INTEGRATED (VERTICAL) TRIBAL ENTERPRISE LICENSE SUPPLEMENT

Required for Tribally owned enterprises operating multiple functions under one license, if authorized.

1. Council Authorization and Enterprise Documents
 - a. Attach Tribal Council resolution authorizing the enterprise.
 - b. Attach charter, bylaws, operating agreement, or similar governing documents.
 - c. Attach any joint venture or management agreements with private partners.
2. Integrated Operations Plan
 - a. Describe how cultivation, processing, testing (if internal), distribution, and retail (if applicable) will be coordinated.
 - b. Explain how duties are separated to prevent conflicts of interest, especially for internal testing or quality assurance functions.
3. Governance and Oversight
 - a. Describe governance structure (board, executives).
 - b. Describe reporting obligations to Tribal Council and Commission.
 - c. Describe internal audit or compliance monitoring functions.
4. Community and Economic Impact

- a. Projected employment and job classifications.
 - b. Tribal Member hiring and training plan.
 - c. Revenue projections and intended use for Tribal services and programs.
5. Compliance and Reporting
- a. Identify an internal compliance officer and their responsibilities.
 - b. Describe the frequency and type of internal reporting and record-keeping.

FORM F – CULTIVATION LICENSE SUPPLEMENT

1. Cultivation Model
- a. Indicate whether the operation is:
 - i. Indoor
 - ii. Outdoor
 - iii. Mixed
 - b. Canopy size requested: _____
2. Genetics and Plant Material
- a. Sources of seeds, clones, and mother plants.
 - b. Procedures for preventing introduction of pests and diseases.
 - c. Any intellectual property or license agreements related to genetics.
3. Cultivation SOP Summaries
- a. Planting and propagation procedures.
 - b. Pruning, training, and canopy management practices.
 - c. Integrated pest management and disease control.
 - d. Harvest procedures, including trimming, drying, curing, and storage.
4. Environmental and Odor Management
- a. Odor control measures.
 - b. Water use and irrigation systems.
 - c. Runoff and discharge management.

- d. Soil or growth media management, including disposal or reuse.
- 5. Waste and Destruction
 - a. Procedures to render cannabis waste unusable where required.
 - b. Documentation and logging of destruction events.

FORM G – PROCESSING / MANUFACTURING LICENSE SUPPLEMENT

- 1. Product Types
 - a. Intended product categories (check all that apply):
 - i. Edibles
 - ii. Beverages
 - iii. Concentrates
 - iv. Vape cartridges
 - v. Tinctures
 - vi. Topicals
 - vii. Other: _____
- 2. Extraction and Infusion Methods
 - a. Description of extraction methods (e.g., solvent-based, CO2, non-solvent).
 - b. List of solvents or gases used, if any.
 - c. Description of equipment and safety controls.
- 3. Food Safety and Quality
 - a. Description of food safety program (e.g., HACCP or equivalent).
 - b. Allergen control measures.
 - c. Cross-contamination prevention.
- 4. Packaging and Labeling
 - a. Description of packaging types (child-resistant, tamper-evident).
 - b. Draft sample labels showing:
 - i. Product name.

- ii. THC and other cannabinoid content per serving and per package.
 - iii. Ingredient list and allergen information.
 - iv. Required health and safety warnings.
 - v. Batch or lot numbers and tracking identifiers.
- 5. Product Stability and Shelf Life
 - a. Approach to determining product shelf life.
 - b. Storage conditions and recommendations.

FORM H – TESTING LABORATORY LICENSE SUPPLEMENT

- 1. Scope of Testing
 - a. Types of samples to be tested (flower, concentrates, edibles, vapes, etc.).
 - b. Analyses to be performed (potency, microbial, mycotoxins, heavy metals, pesticides, residual solvents, etc.).
- 2. Accreditation and Methods
 - a. Current or planned accreditation status (for example, ISO/IEC 17025).
 - b. List of analytical methods and instruments to be used.
 - c. Method validation summaries.
- 3. Quality Management System
 - a. Quality assurance and quality control procedures.
 - b. Calibration and maintenance schedules for instruments.
 - c. Use of control samples, blanks, and reference standards.
 - d. Participation in proficiency testing programs.
- 4. Independence and Conflict of Interest
 - a. Policy ensuring the lab does not have financial interests in licensees whose products it tests.
 - b. Procedures to prevent undue influence on test results.
- 5. Data Integrity and Reporting
 - a. Certificate of Analysis format.

- b. Electronic data management and security.
- c. Procedures for reporting results to clients and to the Commission.

FORM I – TRANSPORT / DISTRIBUTION LICENSE SUPPLEMENT

1. Transport Model
 - a. Description of business model (own fleet, contract drivers, etc.).
 - b. Number and type of vehicles to be used.
 - c. Service area within Tribal lands.
2. Vehicle and Security Plan
 - a. Description of vehicle security features (locked compartments, alarms).
 - b. Policies on vehicle loading and unloading.
 - c. Policies for stopping, parking, and overnight storage.
3. Manifest and Chain of Custody
 - a. Procedures for generating and using transport manifests.
 - b. Documentation at pickup and delivery.
 - c. Procedures for handling returns, rejected shipments, and quarantined product.
4. Incident Reporting
 - a. Procedures for responding to accidents, theft, or loss.
 - b. Notification requirements to law enforcement and the Commission.

FORM J – NURSERY LICENSE SUPPLEMENT

1. Scope of Nursery Operations
 - a. Types of plant material to be produced:
 - i. Seeds
 - ii. Clones
 - iii. Immature plants
 - b. Intended customers: licensed cultivators and other licensees only.

2. Plant Health and Genetics

- a. Disease and pest screening protocols.
- b. Mother plant maintenance and replacement schedule.
- c. Genetic tracking and record keeping.

3. Biosecurity Measures

- a. Quarantine procedures for new genetics or returned plant material.
- b. Cleaning and sanitation procedures for propagation areas and equipment.

4. Sales and Transfers

- a. Procedures to ensure transfers occur only to properly licensed entities.
- b. Integration of all plant movements into the approved tracking system.

PART 4 – APPLICATION REVIEW AND SCORING (FOR COMMISSION USE)

The Commission may apply a scoring system covering:

- 1. Suitability and Integrity of Applicant and Owners.
- 2. Business and Operational Readiness.
- 3. Compliance and Safety Systems.
- 4. Tribal Member Participation and Local Impact.
- 5. Facility and Premises Suitability.

Specific scoring criteria and minimum required scores may be adopted by separate Commission policy or schedule.