



Mille Lacs Band of Ojibwe
Department of Cannabis Regulation
Cannabis Regulations

October 14, 2025

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 1203(f)(iii)(B), this serves as the official Notice of Adoption the following:

Cannabis Regulation – 14: MARKETING, PROMOTIONS, AND ADVERTISING

Summary of changes to CR – 14: MARKETING, PROMOTIONS, AND ADVERTISING include:

The purpose of this regulation is to set forth standards and a review process for marketing activities consistent with requirements under 15 MLBS §§ 1219 and Compact, Attachment A part 9810.1103.

Pursuant to 15 MLBSA § 1203(f)(ii): The Department of Cannabis Regulation reviewed the comments received during the comment period, beginning August 28, 2025, and closing September 29, 2025. The Department of Cannabis Regulation hereby responds to comments below and makes changes as applicable.

Comment 1: CR 14. Changes to clarify and ensure consistent use of calendar days vs. business days, capitalization, internal reference, spacing and tab size were made.

Comment 2: Sections 2.3.1.c- Samples for Workers. Samples and incentives serve strategic and operational purposes, including product familiarity; quality control and feedback; education and training; and culture and morale. We ask that the following limitations be removed: “No more than four samples each year.” Agreed, Removed.

- Clarification; Minimum control standards still apply. Regulated cannabis product provided to cannabis business employees as product samples must be tested and packaged according to DCR Cannabis Regulation.

Comment 3: Section 3.1.1.- Promotional Products. Samples and incentives serve strategic and operational purposes, including product familiarity; quality control and feedback; education and training; and culture and morale. We ask that the following limitations be removed “Not conduct more than four promotional transactions with an individual each year.”

- Clarification; Minimum control standards still apply. Regulated cannabis product provided to cannabis business employees as part of a promotion must comply with all laws and regulations that would apply to a sale of such product at retail.



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Cannabis Regulations

Comment 4: Section 4.2.2.- Outdoor Advertisements. Is the 21-day submission period based on calendar or business days, and could this timeline be shortened? Accepted, Change Made.

- Change: “At least **14 calendar** days before the planned start date for display any advertisement that is subject to section 4.1, the cannabis business must submit to the Department a copy of the proposed advertisement for the Department’s review.”

Comment 6: Section 4.2.2.- Outdoor Advertisements. Is there flexibility to revisit this requirement in the future; would notification to the DCR suffice at some point, rather than prior approval? No Change Needed.

- Intent; DCR approval is a Mille Lacs Band of Ojibwe statutory requirement. As such, request for legislative changes via the Office of the Revisor of Statutes is always available.

Comment 8: Section 4.2.3.a- Advertisement Denial. If an advertisement is denied, will the DCR provide guidance on corrective actions to achieve compliance? No Change Needed.

- Procedure; Yes, the DCR will provide reasoning for denial and, when possible, guidance to bring into compliance.

Comment 9: Section 4.2.3.c- Use of Cartoon Imagery. There is ambiguity around the use of adult-themed cartoon characters (e.g., a pot-leaf mascot). Are all cartoon-style advertisements prohibited, including cosplay or anime-inspired visuals? Change made.

- Clarification; The following change was made to remove ambiguity around advertising with cartoon imagery. Added, 4.3.3. All cartoon-style imagery, including mascots, anime-inspired visuals, cosplay, and stylized characters are prohibited.

Comment 10: Section 4.3.1- Audience Composition Data. Internally, we’ve discussed what qualifies as “reliable, current audience composition data.” Could the DCR provide clarification or examples to ensure consistent interpretation? No Change Needed.

- Clarification; We understand that audience data can vary depending on the platform. What matters is that cannabis businesses make a genuine effort to verify that their ads are reaching adults. Whether it’s a media kit from a radio station, insights from a social media dashboard, or third-party analytics, we’re looking for reasonable, good-faith documentation.

Effective Date: October 14, 2025.



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Cannabis Regulations

The Department of Cannabis Regulation attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the Department of Cannabis Regulation and at [Department of Cannabis Regulation \(DCR\) | Mille Lacs Band of Ojibwe](#).

A handwritten signature in black ink, appearing to read "Hesta Hg", is written over a horizontal line.

Department of Cannabis Regulation Board

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Date