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My name is John Spencer. I am a registered caregiver, medical patient and father in the state of Maine with significant concern surrounding the open - to -interpretation wording of the revocation and suspension section of the proposed rules as well as the lack of protection that the appeal process affords caregivers. In the appeal process there is verbiage that details deadlines to submit appeals for caregivers but no reciprocal deadline for OCP to get back to us by. I have personally waited weeks for replies and even been left unanswered all together (which I will elaborate on later). Stakeholders being given a deadline but not having a deadline for OCP to get back to us by is concerning and I feel leaves room for a personal bias to squeeze timelines and also gives an easy route for a long standing bad stigma and trend of unfair treatment to continue. This should be a 2 way street. An example of this unfair treatment would also be seen where a condition of appeal being submitted "in writing" ( page 79 section 1a) does nothing, in this day and age, but make appeal submittal less convenient and more time consuming as caregivers would need to travel and deliver the appeal in person or snail mail a written copy of their appeal, really doing nothing other than biting into the already short 30 day timeframe. Again leaving room for "sorry we missed you" situations. which seems to be a trend. Us without a leg to stand on being pushed around like we are a bunch of criminals. We are not. We are honest community members. With many of our livelihood's at stake here and the honest living we make that puts food on our families tables, these are unfair barriers/stipulations to implement for really no justifiable reason. They then request an email address to be included which just furthers the lack of sense that the "written" submitted appeal makes. Just feels like more petty, purposeful difficulty and lack of consideration or respect for the stakeholders. Much like not giving stakeholders a reasonable heads up or appropriate time to review on this proposed set of rules. We are seeing a definite trend here.

Aside from the appeal process, the revocation and suspension section as a whole is incredibly concerning. Here I will share a personal experience where Kurt, an inspector with OCP came to my grow and did an inspection. He told me in person that everything looked fine and that I passed my inspection. When I got the email with my inspection report, the report read that I was "in violation" (which he never mentioned once in person) for not having a proper outdoor fence. I do not operate an outdoor cultivation space, and thus do not need any fencing. Kurt then went on to detail in the report that he and I "went over a plan of correction"( which we never did) and then closed the report out as if it was resolved. I emailed Kurt confused and frustrated as the report did not match up with our in person conversation. Kurt told me over email not to worry, and at the end of the day I passed, so it doesnt matter. I replied contesting the fact that "it didnt matter" and asking for recourse. Ic to this day, have not received a reply to my email. For this reason, leaving the rules and their enforcement open to interpretation and in any way subjectively scrutinized, worries me beyond explanation. I have never grown outside and had no signs of outdoor cultivation. I walked my entire property with Kurt and he saw for himself no outdoor cultivation was occurring. There was absolutely no need for a fence. And we absolutely did not go over any "plan of correction" like the report says we did. To think an experience like this could cost me my license under the newly proposed rules turns my stomach. To think I could lose everything I have worked so hard for, and work tirelessly to compliantly maintain, because of something so ridiculous. And then to just be ignored when I ask for reasoning. Very much broke my trust and faith in OCP.

I feel that the "emergency revocation / suspension" section also raises concern for the same reasons. As well as the section x on page 77 that states a minor violation as "other conduct" which is simply too vague. This kind of verbiage should not be allowed as it is far too open to interpretation by the individual. One may think

something is applicable while another might not. We need consistency across the board and firm answers. If they cannot provide a specific list the. I feel it is unfair to play the “wait until we see something we dont like” game.