To: Joint Standing Committee on Veterans and Legal Affairs

From: Samuel Morris / CANIBA LLC

Date: 5-5-25

Subject: Opposition to LD 1847 & LD 104 – Forced Testing & Track-and-Trace: Corporate Collusion, Not Patient Safety

Dear Members of the Committee,

I am writing in unequivocal opposition to LD 1847 and LD 104. These bills do not represent patient protections—they represent a coordinated assault on Maine's independent medical cannabis program and a blatant consolidation of regulatory power into corrupt and compromised hands.

Let's cut through the narrative and deal with the facts.

1. You are mandating a system under federal investigation.

METRC—the track-and-trace software proposed under these bills—is currently under federal investigation for enabling illegal interstate cannabis trafficking. This is not speculation. It's fact. States have documented METRC's failures, including system breaches, diversion, and falsified compliance logs. And yet Maine's Office of Cannabis Policy wants to force this very system on small medical operators with no history of wrongdoing.

2. OCP is under investigation for collusion and protection rackets.

The Maine Office of Cannabis Policy is being investigated for regulatory collusion, misconduct, and selectively applying enforcement based on favoritism and political ties. OCP has repeatedly renewed licenses for massive out-of-state criminal enterprises with known cartel affiliations while targeting compliant local caregivers with impossible fees and audits.

3. 400+ illegal "Triad" grows operate with impunity—while OCP renews their licenses.

Hundreds of large-scale, illegal grow operations tied to international organized crime rings continue to operate across Maine, many with active OCP licenses renewed without consequence. These operations are linked to:

- Murder
- Human trafficking
- Money laundering
- Drug trafficking
- Toxic pesticide and herbicide use banned in the U.S.

These are not rumors. These are documented facts acknowledged in law enforcement investigations. Yet not a single one of these grows is subject to the "patient safety" mandates proposed in LD 1847 or LD 104. Why?

4. Compliant caregivers are being regulated to extinction.

While criminal grows thrive under OCP's protection, local medical caregivers—who built Maine's program—are being taxed, tested, tracked, and choked out of existence. These new mandates would:

- Cost thousands in compliance and testing fees
- Require proprietary software licenses from a federally investigated vendor
- Strip autonomy from small operators and hand it to politically connected middlemen

This is not public safety. This is regulatory warfare against the compliant and protection for the criminal.

5. There is no data justifying these changes.

Where are the mass reports of medical product contamination? Where is the patient harm?

There is no public health crisis. There is only a political crisis—where special interests and compromised institutions are dismantling one of the last locally controlled markets left in Maine.

Final Word:

LD 1847 and LD 104 are not about transparency. They are not about safety.

They are about institutional corruption, regulatory capture, and silencing independent operators in favor of monopolized, state-controlled profits.

I urge this committee to reject these bills and instead launch independent audits into OCP's licensing practices, METRC's legality, and the continued operation of known criminal enterprises under state sanction.

Protect the honest. Investigate the corrupt. Preserve patient access. Reject LD 1847 and LD 104.

Respectfully,

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