



The Healing Community MEDCo

40 Lisbon Street & 741 Main Street
Lewiston, Maine 04240
alex@thcMEDCo.com

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Committee on Veterans and Legal Affairs
100 State House Station
Augusta, ME 04333

Suggestions Regarding LD 525

Dear Senator Luchini, Representative Caiazzo & esteemed members of the Committee on Veterans and Legal Affairs,

I am here today to testify in support of the underlying theme of LD 525, though I believe the bill would need to be modified in order to effectively address the goal of the legislature to keep the medical and adult use market sectors separate.

In order to appease voters, the stakeholders, and the regulators: co-location of medical retail and adult use retail should be treated the same as co-location of medical cultivation and adult use cultivation.

My recommendation to the Committee regarding **18-691 C.M.R. ch. 1 – Adult Use Marijuana Program Rules** would be to strike 2.4.6.A in its entirety,

“No licensee may sell or offer for sale to consumers adult use marijuana and adult use marijuana products within the same facility or building in which the licensee also sells or offers for sale to qualifying patients marijuana and marijuana products for medical use pursuant to 22 MRS, chapter 558-C”

Modify 2.4.6.C to include all types of adult use establishments and to strike the language,

“except that if the [adult use establishment] is co-located with an adult use marijuana store, no marijuana or marijuana products for medical use may be sold or offered for sale in the same facility or building where the adult use marijuana store is located.”

The concerns of the voters and of the Office of Marijuana Policy are sufficiently addressed in 2.4.6.C.1-4:

- (1) The cultivation facility must ensure that marijuana seeds, seedlings, immature plants, or mature plants for medical use are not co-mingled with marijuana or marijuana products for adult use at any time.*
- (2) The cultivation facility must not conduct activities related to marijuana for medical use under a Sales Tax Identification Number or Excise Tax Identification Number associated with an adult use license.*
- (3) The cultivation facility must have distinctly separate entrances from a public right of way for the area of the premises used for retail sales of adult use marijuana to consumers and for the distribution of marijuana and marijuana products for medical use. Under no circumstances can marijuana or marijuana products for medical use be sold in, transferred, transported or otherwise conveyed through any portion of the co-located premises designated for retail sales of adult use marijuana or marijuana products to consumers.*
- (4) The cultivation facility must conduct all cultivation activities for adult use marijuana and marijuana for medical use in accordance with this Rule and 28-B MRS.*

Co-location of medical establishments and adult use establishments will be vital to have a successful cannabis program here in Maine. Thank you for your thoughtful consideration.

Respectfully,



Alex McMahan
Owner
The Healing Community MEDCo
alex@thcMEDCo.com