

August 5th, 2017

Dear WI State Representative Sargent and WI Legislators:

I have reviewed 2017 WI Bill LRB-2457. I wanted to be able to put my support behind a WI cannabis legalization bill - knowing it would need some basic modification. As currently written, I can not put my support behind LRB-2457. It would require well beyond basic modifications to make it an acceptable bill.

Highlights (this is not an exhaustive list) of problematic aspects of the bill (please provide insite if I have misunderstood aspects of the bill):

1. The use of tetrahydrocannabinol instead of cannabis, or even marijuana.
Tetrahydrocannabinol is one cannabinoid among hundreds of phytochemicals in cannabis. Using this word in place of cannabis, or even marijuana (as much as I'm opposed to the use of the word marijuana) is confusing and runs the risk of litigious consequences regarding clarification of the use of tetrahydrocannabinol instead of cannabis or marijuana.
2. Requiring adult-use/non-medical cannabis products to not contain more than a 3:1 of THC:CBD.
3. Clear pharmacist lobbying creating regulations that increase demands on medical dispensaries (compassion centers) which will drive medical cannabis costs up and/or decrease the likelihood of having compassion centers over adult-use dispensaries (mind you, I JUST did the start-up for, and am now partnering with, a cannabis pharmacist consulting company).
4. Clear third party testing lobbying which gives third party testing companies command to train dispensaries, and odd rights to manufacture THC and paraphernalia. Third party testing should test cannabis. There should be regular monitoring (testing the tester) by the state. That is all the third party testing companies should be doing.
5. Forced distribution models that promote unnecessary barriers for cultivators and retailers - including retailers not being able to hold cultivation, processing or distribution licenses. This creates taxation avenues for the state. It also inhibits cultivators to be able to control their pricing and influences margins at the retail level. This all results in higher prices to the consumer.

6. Benefit/risk analysis by physicians for certification. In other states physicians are lobbying to have this removed. There will be less physician participation with this regulation requirement.
7. Separation of medical and adult-use dispensaries and regulations in ways that over-regulate the medical dispensaries (compassion centers) to keep medical cannabis costs high. Medical cannabis is required to be covered by certain insurance providers, but what happens for those un/underinsured?
8. Operating a vehicle while under the influence of THC level of 5ng/mL. We know that endocannabinoid systems vary. This is not an appropriate indicator of over-consumption.
9. Odd lobby efforts for proceeds of medical cannabis program to go to nursing homes - only.
10. Plant count vs. canopy size to determine fee structure. This is, potentially, an imbalanced fee system for indoor growers compared to outdoor growers.
11. Health curriculum that educates young adults about cannabis, but without clarity from what body of knowledge the curriculum will be developed.
12. Extremely limiting signage and advertising rules.
13. Total of 25% tax on adult-use cannabis with no initial plan for the taxes. Taxes at this high a level make it difficult to compete with black market pricing. It will continue to perpetuate the illegal market.
14. Limiting number of qualifying conditions and no allowance for patient-employees to have a space to consume medicine while working.
15. No efforts to remedy the harm done by years of unnecessary imprisonment because of victimless cannabis offenses.

I have attached a PDF of the bill with my specific comments and questions listed throughout in green type...mostly along the left side of the document.

My husband and I are from River Falls, WI (born, raised and returned). I owned a business on Main Street, River Falls, for 9 years from 2007-2016, which I recently sold. My husband and I founded an ancillary cannabis company (in Oregon) two years ago. www.wholeplanttechnologies.com We manufacture and install our patented grow tray and proprietary grow system. Our company also serves a consulting role in the industry. A month ago we were responsible for launching a cannabis pharmacist consulting company (in Arkansas) and have become partnered shareholders to that company. www.phytopharmd.com

I have reached out to Representative Sargent's office before to discuss WI cannabis legalization. Month's back, I was scheduled for a call with Melissa, but instead a

member of her office was only available for the call. That call ended with the member of Rep. Sargent's office telling me they would be in-touch about a panel discussion Rep. Sargent was hosting to discuss WI cannabis legalization. That panel discussion, either did not take place, or I was not invited - as I never heard back from Rep. Sargent's office.

To be fair - I have also reached out to other WI Legislators, in months (and more recent) past, expressing our thoughts regarding WI cannabis legalization and received even less response...canned replies, or dismissed requests for meetings.

Given the resulting bill LRB-2457's content, it is disappointing to me that my willingness and ability to help construct a functional bill was ignored.

My husband and I are immersed and knowledgeable in the medical and recreational commercial cannabis industry. We have consulted on applications in Minnesota and Oregon, we are consulting on Arkansas applications currently, and we have read nearly every legalized state's regulations. Our company has relationships with leading cannabis lawyers, accountants, insurance providers, testing facilities, and ancillary cannabis companies all over the country. Not to mention our relationships with cultivators, processors, distributors, and retailers. We bring a, difficult to find, level of professionalism and authenticity to the cannabis community. Our company succeeds bringing entrepreneurs with illegal cannabis experience up to a professional and regulatory compliant level, AND providing successful entrepreneurs (with no cannabis experience looking to transition to the cannabis industry) much needed cannabis expertise and authenticity to cannabis-as-medicine.

We are focused on patients - first. **We value affordable access to safe cannabis for patients (including personal access to grow cannabis plants) more than we value how the details of a bill may advantage us from a business standpoint.** We value fair entry into cannabis entrepreneurship, sensible regulation, and taxation that supports hunger, homelessness, health, education, Veteran support, and elderly care first. Lastly, we have children with special needs that could benefit from technological advancements of cannabis-as-medicine and we are extraordinarily passionate about promoting scientific research of cannabis-as-medicine. Unfortunately, LRB-2457 does very little to align with our values as it relates to cannabis legalization.

I would love to assist with improving this bill. I would love to serve as an advocate for WI cannabis legalization. I am able to speak with authority on the need for (and efficacy of) medical cannabis, as well as, the benefits a legal cannabis market can have on state

economy. Please contact me if you would like input on modifying this bill to function as a solid piece of legislation. Regardless of LRB-2457, please contact me if you would like to know more about the impact NOT having a legal cannabis program in WI is having on WI citizens and the state's economic potential.

With the pervasive scientific evidence of the efficacy of cannabis and comparative safety, and proven historical malicious positioning of cannabis to stigmatize and oppress dissenting political groups and minority groups, current opposition to cannabis legalization is coming from willful ignorance and/or special interest lobbying dollars. Cannabis legalization is a perfect bipartisan issue that can show a Legislator's ability to support laws based on sound reasoning and the will of The People - all while showing lobbying dollars don't influence votes.

Thank you very much for your time - we appreciate any effort toward legalizing access to cannabis, but we truly believe WI must do better than this bill as it is currently written.

Sincerely,



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