

April 14, 2014

INDUSTRY-WIDE BULLETIN: 14-03

RE: TIME SENSITIVE INFORMATION FROM THE MARIJUANA ENFORCEMENT DIVISION REGARDING INDUSTRY COMPLIANCE

Dear Retail Marijuana Establishment or Medical Marijuana Business Licensee:

Please review all of the information contained within this Industry-Wide Bulletin and ensure that your business is compliant with all laws, rules and regulations.

Data Submission to the Division

Marijuana Inventory Tracking Solution compliance has been required since December 31, 2013, for all Medical Marijuana Businesses and January 31, 2014, for all Retail Marijuana Establishments.

Compliance with the Marijuana Inventory Tracking Solution mandates has eliminated the need for licensees to submit audit data forms to the Division. The MED is no longer asking licensees to submit these forms to monitor compliance:

- 1010 Primary Patient Registration
- 1040 Primary Patient Status Change
- 1060 30% Compliance Report
- 1120 Physical Inventory
- 1070 Monthly Transfers/Sales/Purchases
- 1080 Daily Wholesale
- 1090 Daily Transfers from OPC
- 1100 Daily Patient Sale

All necessary data should be submitted to the Division through your Marijuana Inventory Tracking Solution account and must be current in order to be considered in compliance. Therefore, it is essential that every Marijuana Inventory Tracking Solution account for your licensed premises reflect up-to-date and accurate information.

Since current patient center designation is being monitored with Marijuana Inventory Tracking Solution, it is no longer necessary for Medical Marijuana Centers to send current patient lists to MED. Medical Marijuana Centers and their associated Cultivations must keep a current patient list that includes each patient's Colorado Medical Marijuana Registry number and paperwork supporting any enhanced ounce or plant count on its Licensed Premises.

Medical Marijuana Businesses and Retail Marijuana Establishments should keep a complete and current employee list on-site at each Licensed Premises. The list should include the name and occupational badge number of all employees working at the premises. The lists no longer need to be submitted to the Division, but should be readily available at each licensed premises for inspection by an MED Investigator or any other law enforcement agency.

All MED Medical and Retail Marijuana licensees should also keep a current Secure Facility form on-site at each licensed facility, and the forms should be readily available for inspection by an MED Investigator or any other law enforcement agency.

Please note this bulletin does not include information related to tax reporting, which must still be submitted to the Department of Revenue pursuant to Rules R 902 and M 902.

Transportation Manifests

Any licensee that is not fully operational in the Marijuana Inventory Tracking Solution may not transfer any Medical or Retail Marijuana, Concentrate, or Marijuana Product until it is fully compliant with all Marijuana Inventory Tracking Solution rules and procedures. Licensees must be able to generate a Marijuana Inventory Tracking Solution Transportation Manifest prior to initiating any transfer of any Medical or Retail

Marijuana, Concentrate, or Marijuana Product. DO NOT transfer any Medical or Retail Marijuana, Concentrate, or Marijuana Product to ANY other facility until all required data is entered into Marijuana Inventory Tracking Solution and a Transportation Manifest is generated. See Rules M 801 and R 801.

Similarly, Medical Marijuana Businesses and Retail Marijuana Establishments may not accept any Medical or Retail Marijuana, Concentrate, or Marijuana Product unless it is **accompanied** by a Marijuana Inventory Tracking Solution Transportation Manifest. DO NOT ACCEPT any Medical or Retail Marijuana, Concentrate, or Marijuana Product accompanied by an MED Transportation Manifest form. MED Transportation Manifests are NO LONGER VALID and should NOT be used to transport Medical or Retail Marijuana, Concentrate, or Marijuana Product in any way. See Rules M 801 and R 801.

Any Marijuana being transported via a Transportation Manifest must be done by an individual with a valid occupational license that is in their possession at the time of transport.

Licensees that are not fully compliant with all Marijuana Inventory Tracking Solution rules and procedures should immediately contact the Division. Medical Marijuana businesses and Retail Marijuana establishments who fail to activate and utilize the Marijuana Inventory Tracking Solution in material compliance with regulations may be subject to disciplinary action that could include summary suspension and/or revocation of license.

Regards,

Lewis Koski
Division Director