

August 5, 2014

Industry-Wide Bulletin 14-07

RE: EMERGENCY REGULATIONS ADOPTED BY THE STATE LICENSING AUTHORITY CONCERNING REGISTRATION OF A PRIMARY MEDICAL MARIJUANA CENTER AND MEDICAL MARIJUANA SALES

Dear Colorado Medical Marijuana Industry Members:

On August 1, 2014, the State Licensing Authority (SLA) adopted emergency rules that went into effect immediately. Specifically, Regulation M 402(E) makes it a violation of public safety for a Medical Marijuana Center and its employees to knowingly become a patient's Primary Center when the Medical Marijuana Center or its employees know that a patient already has designated one or more Medical Marijuana Centers as his or her Primary Center.

On August 3, 2014, in conjunction with this emergency regulation, an update in the State's Inventory Tracking System (METRC) was initiated that allows a Medical Marijuana Center to view whether or not a patient is signed up with another Medical Marijuana Center as their Primary Center. If a patient has signed up with multiple Medical Marijuana Centers the patient will be color coded as red in METRC.

Using this capability in METRC, each Medical Marijuana Center has until October 1, 2014, to conduct an audit of their patient records and identify the patients who are registered at multiple Medical Marijuana Centers in METRC. If the Medical Marijuana Center wishes to continue to grow for these patients, the center must contact the patient and determine if the patient wishes for *that* Medical Marijuana Center to be their Primary Center. It will be the responsibility of the patient to notify all of the other Medical Marijuana Centers that they have designated one particular Medical Marijuana Center as their Primary Center. Once a patient is no longer registered with multiple centers the Medical Marijuana Registry Number will then be color coded back to normal (black).

On or after October 1, 2014, if any patient remains classified as being registered with two or more Medical Marijuana Centers in METRC all Medical Marijuana Centers must remove the patient from their patient listing in METRC and must lawfully adjust their marijuana plant and product inventory amounts if they are in excess of the limits associated with the verified patient count.

Additionally, effective August 1, 2014, Regulation M 403(E) places quantity limitations on sales. A Medical Marijuana Center and its employees are prohibited from selling more than two ounces of medical marijuana or its equivalent in medical marijuana-infused product during a single sales transaction to a patient unless that patient has designated the Medical Marijuana Center as his or her Primary Center and supplied the center with documentation from the patient's physician that allows the patient more than two ounces of medical marijuana or its equivalent in marijuana-infused product. A Medical Marijuana Center is strictly prohibited from selling more than two ounces of medical marijuana or its equivalent in marijuana-infused product to any patient who has not registered that Medical Marijuana Center as its Primary Center. MED will be inspecting Centers to ensure that they are in compliance with this regulation.

Regards,

Lewis Koski
Director, Marijuana Enforcement Division