



170 US Route 1
Falmouth, Maine 04105
207.482.0188 F:888.642.8601

www.Integr8Health.com

964 Western Ave.
Manchester, Maine 04351
207.512.8633 F:888.688.0407

October 12th, 2016

Cannabis Legalization

Dear Patients and Friends,

I have long been a proponent of cannabis legalization, and have been actively working towards this goal since 1998. In my medical career, it has been an honor to witness the outstanding therapeutic power of this plant. I believe that we have barely begun to see the economic, environmental and social benefits of cannabis legalization.

I have spent months researching and forming an opinion on the upcoming ballot Initiative #1 to "Regulate Marijuana Like Alcohol." In the following guide, I have first and foremost separated the facts from the predictions, though many predictions are based on real experiences in Maine and other states that have recently legalized cannabis.

As a physician and medical director of Integr8 Health, my primary concern is the health of our current patients who are successfully using cannabis to address medical issues. With that priority in mind, I believe that voting against Initiative #1 will be the safest approach to preserve patient access to medical cannabis.

Your vote, however, may take into consideration other important factors, including civil liberties, public health, economics, and the environment. Thus, I cannot tell you how to vote, but have summarized the key points to help you make an informed decision.

Regardless of the outcome, I am certain that persistent grass-roots activism will be essential to achieving the best result for cannabis in Maine, and your future participation as an activist and voting constituent will likely be more important than your vote in November. If the initiative passes, we'll be working hard to prevent corporate takeover and preserve the medical program. If the initiative fails, we'll be working hard to remove marketplace restrictions and allow access to cannabis for all patients regardless of their diagnosis.

Thank you for carefully considering the following information before deciding how you will vote on Initiative #1. I believe that if we work together, cannabis can become as liberated as chamomile or any other herb, and we can maintain and expand the current access for patients in Maine.

Sincerely,

A handwritten signature in black ink that reads "Dustin Sulak".

Dustin Sulak, D.O.
Founder and Co-medical Director, Integr8 Health

What We Know For Sure

Cannabis is already *partially* decriminalized in Maine.

- Possession of up to 2.5 ounces of cannabis is considered a civil violation, and punishable by maximum \$1,000 fine with no arrest. The offense does stay on the offender's record and can interfere with student loans, employment, etc. Approximately 1,700 Maine adults face these consequences annually.
- In 2015, Maine had 2,795 arrests for cannabis possession over 2.5 ounces and 238 arrests for sale and/or manufacturing (Maine State Police website). These average 8 people arrested daily in Maine *would still be at risk of arrest* if Initiative #1 passes. People incarcerated or carrying criminal records from cannabis-related offenses will not be pardoned.
- Maine currently has a well-functioning medical cannabis system that protects patients, has helped develop the local economy, and has great potential for improvement.

Details of Initiative #1:

- Adults (21 and over) can grow up to 6 flowering and 12 immature plants at home.
- Adults can purchase cannabis from licensed retailers only and pay 10% sales tax.
- Adults can possess up to 2.5 ounces of cannabis.
- The total canopy for commercial growing is capped at 800,000 ft².
 - 40% of licenses will be awarded to cultivation facilities less than 3,000 ft².
 - 60% of licenses will be awarded cultivation facilities up to 30,000 ft².
 - There will be approximately 122 total cultivation licenses if the maximum canopy is awarded to each applicant, in addition to the ~3,000 cultivators in the current medical program. If supply for adult use cannabis is not meeting demand, additional cultivation licenses can be awarded.
- There are no limits placed on licenses for retailers, social clubs, and testing facilities.
- The medical program is explicitly not impacted or usurped by this initiative, which is intended to create and regulate an adult use market separate from the medical program.
- Details can be modified via legislative action before being enacted.

Timeline of the Initiative #1 if passed:

- November, 2016: vote on ballot initiative
- The measure takes effect December 2016 (30 days after the governor proclaims the results).
 - Adult possession and personal cultivation will be legal.
 - Adults will not be able to legally purchase cannabis until licensed retailers are open for business.
- Retail cannabis will likely be available in late 2018 or 2019
 - Rules for application and licensing of growers, distributors, retailers, etc. will likely take 6-12 months.
 - The process of awarding licenses will likely take 3-6 months, followed by another 6 months for the cannabis to be produced and ready for retail.

Benefits of maintaining medical cannabis certification if the initiative passes:

- Required to purchase cannabis until late 2018 or 2019
- Avoid 10% sales tax on adult personal use cannabis
- Continue a therapeutic relationship with your Integr8 medical provider, who can offer personalized guidance on maximizing benefit and minimizing side effects of cannabis and other aspects of your health.

Full text of the initiative: <http://www.maine.gov/sos/cec/elec/citizens/marijuanaleg.doc>

Some Theories on the Effects of Initiative #1

Why Initiative #1 might be GOOD for current patients:

- Access to cannabis will likely increase.
 - The cannabis marketplace will likely see more competition and lower prices.
 - We may see more availability of cannabis throughout the state, including higher quality and safer cannabis products with better quality controls.
- Maine could become an innovation center for cannabis
 - We may see increased opportunities for horticultural and clinical research.
 - Maine could become cannabis industry leaders in New England and worldwide.
- An increase in legal cannabis commerce, tourism, ancillary businesses, and tax revenue may improve the overall economic situation in Maine.
- Improved social acceptance and decreased stigma associated with cannabis use.

Why Initiative #1 might be BAD for current patients:

- The current medical program could be shut down.
 - This is exactly what happened in Washington State via legislation less than 6 months after their initiative passed, despite numerous promises during the campaign that the medical program would be unaffected. Approximately 1,500 medical cannabis dispensaries were shut down and replaced with 222 new retail licenses, and medical users currently have to pay 37% sales tax (increased via legislation from the 25% originally in the voter initiative). Doctors that specialize in medical cannabis have closed their practices, and patient privacy has been compromised.
- Caregivers in Maine may not be able to continue serving patients
 - Large commercial operations may flood the market with low-cost, lower-quality cannabis, making small-scale production economically unfeasible.
 - Future legislation or rulemaking may require caregivers to comply with regulations that apply to large-scale operations, such as expensive software for seed-to-sale tracking.
- Medical cannabis products and services may become difficult to access.
 - While the current artisanal market favors products designed for medical benefits and patient safety, including CBD-rich cannabis, tinctures, oils, salves, and organic growing techniques, the adult-use market may focus on THC-dominant inhaled and edible products.
 - Services such as extraction and laboratory testing may be available only to producers and not consumers or patients, as is currently the case in Colorado.
 - These effects would be especially detrimental to children and vulnerable patients.
- Licenses may not be awarded to companies that prioritize consumer safety and high-quality medicine.
 - In Florida, cannabis cultivation licenses were awarded to only 5 companies, several of which have previously been cited for violations related to pesticides, pollution and other offences. Losing applicants have sued the state over the unfair selection process, already costing the state \$500,000 in legal fees.
 - Despite government regulation in the recreational program, high levels of toxic contaminants have recently been reported in cannabis products from Washington State (Russo, 2016).
- Maine may see stronger efforts to pass a cannabis OUI law based on blood THC levels, which would criminalize most current patients.