

PHARMACEUTICAL-GRADE CANNABIS

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Senate Bill 660 (Substitute H-1)
Sponsor: Sen. Roger Kahn, M.D.
House Committee: Judiciary
Senate Committee: Government Operations

Complete to 12-11-13

A SUMMARY OF SENATE BILL 660 AS REPORTED FROM HOUSE COMMITTEE 12-10-13

The bill would amend the Public Health Code to specify that marihuana, including pharmaceutical-grade cannabis, would be a schedule II controlled substance if manufactured, obtained, dispensed, possessed, or grown in compliance with the Public Health Code and if it is reclassified as a schedule II controlled substance by the federal government. [The bill wouldn't have any effect unless the federal government acted to reclassify marihuana as a schedule II controlled substance.]

The bill would also provide for the licensure of facilities that manufacture, cultivate, and test pharmaceutical-grade cannabis; authorize licensed facilities to sell pharmaceutical-grade cannabis to licensed pharmacies for dispensing to eligible patients and other licensed facilities; allow for prescriptions to be written; establish criteria for the issuance of enhanced pharmaceutical-grade cannabis registration cards; and provide for penalties for violating the Code.

Specifically, the bill would amend Article 7 (Controlled Substances) of the Public Health Code to specify that marihuana, including pharmaceutical-grade cannabis, would be classified as a schedule II controlled substance if it is manufactured, obtained, stored, dispensed, possessed, grown, or disposed of in compliance with the Public Health Code and authorized by federal authority. Additionally, the bill would include marihuana as a schedule II controlled substance for the purpose of treating a debilitating medical condition.

The bill would also add a new Article 8 (Pharmaceutical-Grade Cannabis) to the Code to, among other things, do the following:

- Establish a new license for facilities that cultivate, manufacture, and test pharmaceutical-grade cannabis. Additionally, require an individual to have a controlled substance license before manufacturing, distributing, prescribing, or dispensing pharmaceutical-grade cannabis. [Facilities would have to possess both licenses.]
- Allow physicians to recommend and LARA to issue enhanced registration cards to eligible patients.

- Allow for the writing of prescriptions for pharmaceutical-grade cannabis. Prescriptions could not be written for anyone under 18 years old. A prescription could not allow an individual to obtain more than 2.5 ounces of cannabis, and the cannabis would have to be kept only in its original packaging or container provided by its manufacturer or by the dispensing pharmacy.
- Prohibit licensed facilities from selling directly to the public and only allow them to sell to licensed pharmacies for dispensing to eligible patients and other licensed facilities.
- Prohibit local units of government from enacting or enforcing an ordinance regarding licensed facilities, except to limit the number of licensed facilities that may be in operation and enact reasonable zoning regulations.
- Allow LARA to delegate inspection responsibilities of licensed facilities to local health departments that have the technical and other capabilities, and require the state to reimburse local health departments the full amount of the fees collected. Each licensed facility would have to be inspected at least once during the term of its license.
- Allow LARA to charge reasonable fees to cover the cost of administering and enforcing the requirements of the bill.
- Require LARA to promulgate rules to establish, among other things, (1) procedures for making a determination on a license or registration card application, (2) procedures for issuing enhanced registration cards, (3) specifying legitimate sources for obtaining seeds to cultivate the product, (4) health, sanitary, and security requirements for licensed facilities, and (5) the quantity of cannabis plants and dried material a licensed facility may have in its inventory at any time.
- Require LARA to establish an online registry of licensed facilities.
- Require cannabis that is dispensed by a pharmacist to be labeled, and include minimum information, including dosage and the total percentage of THC and CBD.
- Require prescriptions to contain basic information, including dosage and instructions for use.
- Require licensed facilities to destroy all marijuana that it cultivates that is determined not to be pharmaceutical-grade cannabis.
- Establish the Pharmaceutical-Grade Cannabis Fund.
- Provide for the suspension or revocation of facility licenses and enhanced registration cards, and establish penalties for violation Article 8.

The bill would also amend other articles of the Public Health Code to include references to Article 8 in provisions (1) concerning disciplinary procedures, (2) regulating pharmacy practice, and (3) a prohibition against disciplining health facility employees for reporting malpractice.

A section-by-section description of Article 8 is contained later in the summary, beginning on Page 4.

FISCAL IMPACT:

Senate Bill 660 (H-1) would have a fiscal impact only if the federal government reclassified cannabis (marijuana) as a Schedule II controlled substance. If cannabis were to be reclassified and SB 660 became effective, it would likely have a neutral fiscal impact on the Department of Licensing and Regulatory Affairs (LARA) and local units of government. SB 660 (H-1) stipulates that LARA may charge reasonable fees, which do not exceed the amount necessary to support LARA's regulatory responsibilities, for licensing, registration, inspection, testing, investigation, and other activities and services pertaining to the direct or delegated regulation of pharmaceutical-grade cannabis. Such fees, deposited into the Pharmaceutical-Grade Marijuana Fund, would be published, explained, periodically revised, and presumably be sufficient to offset expenditures engendered by LARA's direct and delegated regulatory responsibilities under SB 660 (H-1).

Under SB 660 (H-1), LARA could delegate statutorily-required inspections of pharmaceutical-grade cannabis licensed facilities to local health departments if the locals possessed the technical and other necessary capabilities to protect public health, safety, and welfare. An ad hoc committee appointed by LARA (including members from LARA, local public health agencies, and an association representing pharmaceutical-grade cannabis licensed facilities) would advise LARA on the delegation on inspection duties. Local health departments would be reimbursed with the full amount of regulatory fees collected to support the costs of inspections.

In order to receive an Enhanced Pharmaceutical-Grade Cannabis Registration Card under SB 660 (H-1), eligible patients would be required to surrender a Registry Identification Card (RIC) issued under the Michigan Medical Marijuana Act of 2008 (MMA) if they held such a card. The new or renewal application fee for a RIC is \$100 biennially (\$25 if the patient is enrolled in Medicaid or receives SSI payments). In FY 2012-13 118,368 patients filed for RICs, which generated \$10.9 million in application fees. During FY 2012-13, LARA expended \$4.1 million to administer the Medical Marijuana Program (MMP) and the closing balance within the Michigan Medical Marijuana Fund (MMMF) was \$23.5 million. Thus, in FY 2012-13 and years previous, application fees for RICs have exceeded LARA's administrative costs for the MMP; the introduction of biennial renewal of RICs which began in FY 2012-13 pursuant to 2012 PA 514 may alter this pattern in future years.

To the extent that patients would surrender their RICs in order to receive Enhanced Pharmaceutical-Grade Cannabis Registration Cards under SB 660 (H-1), LARA would receive less application fee revenue and likely expend less money to support administration of the MMP. However, in addition to \$4.4 million appropriated for administration of the MMP, \$3.0 million was appropriated in the FY 2013-14 budget for Medical Marijuana Operation and Oversight Grants to county law enforcement departments for the operation and oversight of the MMP, which would be supported with revenue generated by application fees deposited into the MMMF. If SB 660 (H-1) became effective, the potential reduction in application fee revenue collected under the

MMP could affect the amount of funds available to support Operation and Oversight Grants to county law enforcement departments.

Finally, SB 660 (H-1) may have an interim and nominal negative fiscal impact on LARA to the extent that LARA would have to expend resources to promulgate administrative rules necessary for the administration, implementation, and enforcement of SB 660 (H-1).

DETAILED SUMMARY OF ARTICLE 8:

Part 81 – General provisions

Section 8109 – Controlled substance license

Individuals would be prohibited from manufacturing, distributing, prescribing, or dispensing pharmaceutical-grade cannabis unless first issued a controlled substance license under Article 7. Licenses issued under Article 7 would be subject to the new requirements established in Article 8, and neither Article 7 nor 8 would apply to conduct that is permitted under the MMMA.

Section 8110 - Fees

Beginning when the bill takes effect, the LARA director could charge a reasonable fee for licensing, registration, inspection, testing, investigation, or other activities or services that LARA provides under Article 8. These new fees would be in addition to any fees already charged under Article 7 and would have to be remitted monthly to the state treasurer for deposit into the newly created Pharmaceutical-Grade Cannabis Fund (created in Section 8111).

LARA would be required to develop a comprehensive fee schedule that includes a description of each activity or service provided by the department, its corresponding maximum fee, and the rationale used to determine the fee schedule. The schedule would have to be revised periodically to ensure that the fees being collected do not exceed the amount necessary to fund LARA's responsibilities under Article 8.

Section 8111 - Pharmaceutical-Grade Cannabis Fund

The bill would create the Pharmaceutical-Grade Cannabis Fund within the state treasury to collect the fees for licensing, registration, inspection, testing, investigation, and other activities and services provided by LARA. The State Treasurer would be responsible for directing the fund's investments and interest and earnings would be credited to the fund. Money in the fund at the close of the fiscal year would remain in the fund and would not lapse to the General Fund.

LARA would be the administrator of the fund for auditing purposes and would be required to expend money from the fund, upon appropriation, only to cover the direct and indirect costs associated with implementing, administering, and enforcing Article 8.

Section 8115 – Promulgation of Rules

LARA would be required to promulgate rules necessary to carry out Article 8 that address at least all of the following:

- Necessary activities for the compliance with or enforcement of, activities that constitute a violation of Article 8, including procedures and grounds for denying, suspending, or revoking a license or registration card.
- Instructions for access by local health departments and law enforcement.
- All necessary or convenient forms for the implementation, administration, and enforcement of Article 8.
- Activities that would constitute or result in misrepresentation or unfair, deceptive practices.
- Procedures and forms for issuing enhanced pharmaceutical-grade cannabis registration cards.
- Regulating the manufacture, inventory, storage, disposal, and sale of pharmaceutical-grade cannabis, and specifying the legitimate sources to obtain seeds for its cultivation.
- Quarterly reporting by licensed facilities of their inventory, including the number of plants under cultivation, the amount of dried plant material, the amount of destroyed plants, and all sales.
- Compliance with federal regulatory requirements.
- Health and sanitary requirements for licensed facilities.
- Record keeping, retention, storage, and security requirements for licensed facilities.
- Audit requirements for licensed facilities, including monthly self-reporting of inventory, subject to inspection by designated state and federal authorities.
- Physical security requirements for licensed facilities that at a minimum include lighting and alarms.
- Reporting and transmittal of monthly sales and income tax payments for licensed facilities.
- Authorization for the Department of Treasury to have access to licensing information to ensure sales and income tax payments for licensed facilities.
- Activities that constitute lawful and unlawful financial arrangements between licensed facilities.
- Quantity of pharmaceutical-grade cannabis plants and dried plant material that a licensed facility can have in its inventory at any time.
- Other matters deemed necessary for the fair, impartial, stringent, and comprehensive implementation, administration and enforcement of Article 8 to protect the public health, safety, and welfare.

Section 8117 – Online registry

LARA would be required to establish a publically available Pharmaceutical-Grade Cannabis Licensed Facility Registry. The registry would have to be an online database containing information regarding facilities licensed under Part 82.

Section 8119 – Annual report

By January 31 of each calendar year, LARA would have to submit an annual report to the legislature detailing all of the following for the previous calendar year:

- Total amount of fees collected under Article 8.
- All costs related to performing its duties under Article 8.
- Fines, suspensions, or license revocations that were imposed under Article 8.
- Any other information it considers appropriate to include.

Part 81a – Prescribing and dispensing cannabis

Section 8151 – Recommendation for enhanced registration card

A physician that has determined a patient would likely receive therapeutic or palliative benefit from using pharmaceutical-grade cannabis to treat or alleviate a debilitating medical condition or its symptoms would be authorized to recommend that the patient be issued an enhanced pharmaceutical-grade cannabis registration card as an eligible patient.

Section 8152 – Issuance of registration card

LARA would be authorized to issue an enhanced pharmaceutical-grade cannabis registration card to eligible patients (1) that have been recommended by a physician to obtain a registration card and (2) have properly applied for a registration card.

Prior to issuing a registration card LARA would be required to determine whether the applicant has previously been convicted of a felony violation for illegally manufacturing, creating, distributing, possessing, or using a controlled substance, or conspiring or attempting to do any of these activities in Michigan or elsewhere. Individuals with a previous felony violation would be ineligible from obtaining a registration card.

Individuals with a registry identification card issued under the MMMA would be required to surrender that card to LARA prior to being issued an enhanced pharmaceutical-grade cannabis registration card.

Section 8153 - LEIN

LARA would be required to ensure that the following information is entered into the Law Enforcement Information Network (LEIN) for each registration card that is issued:

- Card registration number.
- Name and address of the individual being issued the card.
- Date the card was issued and its expiration date.
- Name and address of the authorizing physician.

LARA would not be authorized under Article 8 to enter any information into LEIN regarding the diagnosis supporting issuance of a registration card or any medical information regarding an individual that has been issued a registration card.

Section 8154 – Prescription requirements & information access

Every prescription for pharmaceutical-grade cannabis would have to include the following:

- The date the prescription is written, the date it is filled, and the dosage and instructions for use, including the percentage of total THC and CBD. A prescription could not allow an individual to obtain more than 2.5 ounces of cannabis, and the cannabis would have to be kept only in its original packaging or container provided by its manufacturer or by the dispensing pharmacy.
- The name, address, and federal Drug Enforcement Administration number of the dispensing pharmacy and the initials of the pharmacist filling the prescription.
- The name, address, and birth date of the eligible patient receiving the prescription. Prescriptions could not be written to anyone under 18 years old.
- The product brand name if a brand name is specified by the prescriber.

LARA would have to require the use of the electronic system established in Article 7 to monitor pharmaceutical-grade cannabis that is dispensed as a schedule 2 controlled substance. [Article 7 (MCL 333.7333a) requires the Department of Community Health to establish an electronic system to monitor schedule 2, 3, 4, and 5 controlled substances that are dispensed by veterinarians, pharmacists, and dispensing prescribers.]

The LARA director would only be allowed to permit access to information submitted under Article 8 to the following individuals:

- Authorized employees and agents of LARA.
- State, county, and other local law enforcement personnel authorized by the administrator under Article 7 for the purpose of cooperating and assisting a governmental agency that is responsible for the enforcement of laws relating to controlled substances or prescribing physician or pharmacy concerning an individual suspected of attempting to obtain a controlled substance through fraud, deceit, or misrepresentation.
- A person LARA has contracted with to help administer Section 8154. [The bill allows LARA to enter into contract agreements for the administration of the section.]

Information that is submitted to LARA under Section 8154 would be considered confidential, and could only be released to persons authorized by the director to conduct research studies or persons otherwise authorized to receive the information. Subject to the release requirements of the section, information could only be released for statistical purposes.

The system used to retrieve information that is submitted to LARA would have to be designed in all respects to preclude improper access to the information.

Except as otherwise provided, information submitted to LARA could only be used for bona fide drug-related criminal investigatory or evidentiary purposes for investigatory or evidentiary purposes in connection with the functions of one or more of the licensing boards created under Article 15.

The identity of an individual eligible patient that is submitted to LARA would have to be removed from the information retrieval system and be destroyed and rendered irretrievable no later than the end of the calendar year following the year in which the information was submitted. Identities that are necessary for use in a specific ongoing investigation conducted in accordance with the Public Health Code could be retained until the end of the year in which the necessity for retention ends.

Part 82 – Facility Licensing

Section 8201 – Licensing of facilities

LARA would be required to license facilities under Article 8 that cultivate, manufacture, and test pharmaceutical-grade cannabis in Michigan. LARA would have to implement, administer, and enforce Article 8 to ensure that a safe, pure, dosage-consistent grade of pharmaceutical-grade cannabis is available to eligible patients.

Section 8205 – License requirements

LARA could not issue a license to operate a pharmaceutical-grade cannabis licensed facility unless it is satisfied that all of the following were met:

- All fees required under Article 8 are paid.
- The licensed facility will be operated in compliance with Article 8.
- The applicant is an adult of good moral character.
- The applicant is not delinquent in filing any tax returns with a taxing agency; paying any taxes, interest, or penalties; paying any judgments due to a government agency; repaying government-insured student loans; or paying child support.
- The applicant will conduct criminal history checks in accordance with promulgated rules before hiring or contracting with anyone in the course of operating a licensed facility.
- The premises were inspected and the inspection of the premises and the operations of the applicant did not reveal any reason to deny the license application.
- The criminal history check conducted did not reveal any felony or other convictions involving a controlled substance.
- Any other criteria established through promulgated rules.

At the time of filing an application, an application would have to submit fingerprints and file personal history information concerning his or her qualifications for a license under Article 8. LARA would have to then submit the fingerprints to the State Police, and forward them to the Federal Bureau of Investigation (FBI) to conduct a fingerprint-based criminal history check.

LARA could use the information obtained through a fingerprint-based criminal history check to investigate and determine whether an applicant is qualified to hold a license. LARA could verify any of the information an applicant is required to submit. The State

Police would be required to keep a copy of the fingerprint images and must notify LARA if the licensee is arrested or convicted.

The FBI would also be able to retain a copy of the images to provide notification if a licensee is arrested or convicted. Upon being notified of an arrest or conviction, LARA would have to determine whether the licensee is still qualified to hold a license. LARA would have to provide notification to the State Police when an individual is no longer licensed under Article 8.

Section 8209 – Delegation of inspection duties

LARA would be able to delegate inspection duties for approval or renewal of licenses to a local health department with the technical capability to perform such work. The delegation can only take place once LARA has first consulted with an ad hoc committee appointed by the department for the purposes of advising on the delegation of inspection duties.

The ad hoc committee would have to include representatives from LARA, local public health agencies, and an association that represents the licensed facilities that would be subject to inspection. If delegated, the state would have to reimburse each local health department the full amount of the fees collected as reimbursement for the cost of inspection.

Section 8211 – License renewal

A person operating a licensed facility seeking relicensure must apply for license renewal and pay the appropriate fees no later than thirty days before the annual license expires. LARA would be required to issue renewal licenses to applicants that are in compliance with the requirements of Article 8 and have paid the license renewal fee.

Part 83 – Licensed Facility Operations

Section 8301 – Legal control

Licensed facilities would be required to establish legal control of their physical location and meet all applicable state and local zoning laws.

Section 8303 – Records and criminal history check

Licensed facilities would be required to maintain on their premises a record (including name and birth date) of each officer, director, partner, member, manager, or employee. The facility would have to obtain each individual's identification and have a criminal history check performed to determine if each individual is qualified to work at or be associated with the facility.

A facility would have to notify LARA within 10 days after an individual stops working at or otherwise being associated with the facility.

Facilities would be prohibited from acquiring, possessing, cultivating, delivering, transferring, transporting, supplying, selling, or dispensing pharmaceutical-grade

cannabis except as authorized under Article 8. Facilities would also be prohibited from possessing more than the amount of cannabis or dried material allowed in its inventory under rules that would have to promulgate after the bill is enacted.

Facilities would have to destroy all marijuana that is cultivated or possessed and is subsequently determined to not be of pharmaceutical-grade. Facilities would be required to maintain records of this activity to verify compliance with LARA. Additionally, facilities would be required to irradiate all pharmaceutical-grade cannabis in a manner determined by LARA before delivering it to another person.

The bill also establishes microbiological, mycotoxins, and heavy metals standards for pharmaceutical-grade cannabis. [These standards are on page 32 of the H-1 substitute.]

Section 8305 – For-profit or non profit

Facilities could operate as a for-profit or non-profit entity.

Section 8307 – Operation requirements

Licensed facilities could operate on any day of the week but would be required to do the following:

- Prohibit the smoking or consumption of marijuana on its premises.
- Maintain all records that are required under Article 8.
- Make the premises available during regular business hours for inspection by LARA, law enforcement, and other government agencies authorized to inspect the premise. Evidence of a violation that is discovered during an inspection could be seized and used against the licensee in an administrative or court proceeding.

Section 8309 – Not liable under product liability action

The bill provides that in addition to provisions of the Revised Judicature Act (MCL 600.2946), in a product liability action against a licensed facility, pharmaceutical-grade cannabis is not defective or unreasonably dangerous, and the licensed facility is not liable if the product sold was tested and determined to meet the standards for pharmaceutical-grade cannabis under Article 8.

Section 8401 – Cannabis dispensing

Licensed facilities would be prohibited from selling pharmaceutical-grade cannabis directly to the public and would be limited to selling it to licensed pharmacies for dispensing to eligible patients and other licensed facilities.

Cannabis that is dispensed by a pharmacist or retail pharmacy would need a label showing, in legible English, the manufacturer's name and address, the date the prescription is filled, the dosage (including the total percentage of THC and CBD), the patient's name, and the name and address of the dispensing pharmacy.

All licensed facilities would have to provide written quarterly reports to LARA regarding all quantities of pharmaceutical-grade cannabis sold to licensed pharmacies, retail pharmacies, and other licensed facilities. The reports would have to include the name

and address of each entity listed above to which the cannabis is sold. Reports could be transmitted to LARA electronically if ultimately reduced to writing.

Part 85 – Enforcement

Section 8501 – Enforcement and inspections

LARA would be charged with enforcing the new Article 8 and the applicable provisions of Article 7. The department would have to conduct at least one inspection of each licensed facility to ensure compliance.

LARA would be authorized to suspend the license of a licensed facility without notice or hearing upon finding that an emergency exists that requires immediate action to protect the public. An order of license suspension would have to detail the emergency and the facts supporting the determination. Notwithstanding provisions of the Public Health Code and the Administrative Procedures Act, an order for license suspension would take effect immediately upon issuance.

Individuals whose license is suspended would be required to comply with the order but could apply to LARA for an appeal hearing within 15 days. Based on the hearing, an order for summary suspension would have to be continued, modified, or dissolved within 30 days after the hearing takes place.

Section 8503 – License suspension or revocation

In addition to any other penalties provided for in Articles 7, 8, or 15 of the Public Health Code, LARA could suspend or revoke a facility license on its own motion or after receiving a complaint, and after an investigation and hearing were completed in which the licensee is provided an opportunity to be heard.

A license could be suspended or revoked for any violation of the Public Health Code by the licensee, a board member, agent, or employee of the facility, or for a violation of the terms and conditions of the license. LARA would have the ability to administer oaths and issue subpoenas to compel the presence of people and the production of materials necessary to determination of a hearing.

LARA would be required to provide notice of a license suspension or revocation and any required notice of a hearing. No fees paid for a license under Article 7 or 8 would be returned to a licensee upon a suspension or revocation.

Section 8505 – Testifying at licensing hearing

Testimony or other information produced in a licensing hearing and any other information directly or indirectly derived from testimony could not be used against a person in any criminal prosecution based on a violation of Article 8, except to prosecute for perjury committed while testifying. As a result, the bill would prohibit individuals from refusing a request from LARA to testify or provide information on the grounds of self-incrimination during any licensing hearing.

Individuals that continuously refuse to testify or provide information at a licensing hearing could have their facility license or registration card suspended or revoked by the department.

Section 8507 - Violations

An owner, operator, or agent of a licensed facility who knowingly violates or establishes or operates a licensed facility in violation of Article 8 would be guilty of the following:

- Except as provided below, a misdemeanor punishable by up to 90 days in jail and/or a maximum fine of \$10,000.
- If a person has one prior conviction for violating Article 8, a misdemeanor punishable by up to 180 days in jail and/or a maximum fine of \$50,000.
- If a person has two or more prior convictions or has intentionally violated Article 8, a misdemeanor punishable by two years in jail and/or a maximum fine of \$100,000.

The bill would not prevent a person from being charged with, convicted of, or sentenced for any other violation of a law that is committed while violating Section 8507.

Section 8509 – Not subject to punishment

A licensed facility that has been issued a license, or anyone affiliated with the facility as specified in the bill, would not be subject to arrest, prosecution, or penalty in any manner for the cultivation, distribution, and sale of pharmaceutical-grade cannabis under Article 8 that is for use by eligible patients in the manner provided under the bill.

Section 8511 – Prohibit local ordinances

Local units of government would be prohibited from enacting or enforcing ordinances regarding pharmaceutical-grade cannabis licensed facilities but would be permitted to (1) limit the number of facilities that may operate in the unit and (2) could enact reasonable zoning regulations based on local zoning, health, and safety laws for the cultivation, distribution, and sale of pharmaceutical-grade cannabis.

Enacting Section 1

The bill would repeal Sections 7335 and 7336 of the Public Health Code. These sections required the Department of Community Health to establish a marijuana therapeutic research program and provided for its operation. Statutory authorization for the program expired effective November 1, 1987.

POSITIONS:

CEN Biotech supports the bill. (12-5-13)

Michigan Chapter of the National Organization for the Reform of Marijuana Laws (NORML) supports the bill. (12-10-13)

Subterra Rec. supports the bill. (12-5-13)

Michigan State Police are neutral on the bill. (12-10-13)

Cannabis Patients United is neutral on the bill. (12-5-13)

Michigan Pharmacists Association is neutral on the bill. (12-10-13)

Safe Michigan Coalition is neutral on the bill. (12-5-13)

Office of Attorney General opposes the bill. (12-5-13)

Advanced Hydroponics Growers Supply opposes the bill. (12-5-13)

Cannabis Cancer Project opposes the bill. (12-10-13)

Cannabis Stakeholders Group opposes the bill. (12-5-13)

Citizens for Human Rights opposes the bill. (12-10-13)

City of Wyoming opposes the bill. (12-5-13)

National Medical Marijuana Coalition opposes the bill. (12-10-13)

Michigan Moms United opposes the bill. (12-5-13)

Michigan Saber Project opposes the bill. (12-5-13)

The Compassion Chronicles opposes the bill. (12-5-13)

Legislative Analyst: Jeff Stoutenburg
Fiscal Analyst: Paul Holland

■ This analysis was prepared by nonpartisan House staff for use by House members in their deliberations, and does not constitute an official statement of legislative intent.