



**MURIEL BOWSER**  
**MAYOR**

February 26, 2021

The Honorable Phil Mendelson  
Chairman, Council of the District of Columbia  
1350 Pennsylvania Avenue, N.W., Suite 504  
Washington, D.C. 20004

Dear Chairman Mendelson:

Today, I am transmitting to the Council of the District of Columbia (Council) for its consideration and approval the "Medical Cannabis Amendment Act of 2021." The bill seeks to amend the Legalization of Marijuana for Medical Treatment Initiative of 1999, effective February 25, 2010 (D.C. Law 13-315; D.C. Official Code §§ 7-1671.01, et seq.), as amended to ensure that the District's medical cannabis program is operating optimally for the benefit of the District's qualifying patients. A few of the amendments include:

1. Eliminating the requirement that qualifying patients register with a dispensary; thus, allowing qualifying patients to obtain their medical cannabis and medical cannabis products from any dispensary registered in the District.
2. Allowing dispensaries to operate safe use treatment facilities as well as offer tastings and demonstrations and/or classes with the proper endorsements;
3. Allowing dispensaries to deliver medical cannabis and medical cannabis products directly to qualifying patients and caregivers in the District as well as offer curbside pickup;
4. Allowing all returning citizens to work at a medical cannabis business;
5. Limiting the prohibition preventing persons with felony convictions from being officers, owners, or agents of a dispensary, cultivation center, and testing facilities to crimes of violence, a gun offense, tax evasion, fraud and credit card fraud occurring within the previous three years;
6. Eliminating the count on the number of plants that a cultivation center can grow;
7. Increasing the number of permitted dispensaries from eight to 16, and increasing the number of permitted dispensaries in each ward to two; and
8. Eliminating testing laboratory facilities when determining the cap in an election ward for cultivation centers.

The bill also further expounds upon the Alcoholic Beverage Control Board's responsibilities and authority to enforce the District's medical cannabis program.

For these reasons discussed above, I urge the Council to take prompt and favorable action on the enclosed proposed bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Muriel Bowser".

Muriel Bowser



Chairman Phil Mendelson  
at the request of the Mayor

A BILL

IN THE COUNCIL OF THE DISTRICT OF COLUMBIA

To amend the Legalization of Marijuana for Medical Treatment Initiative of 1999 to rename the term “medical marijuana” to “medical cannabis” and the word “marijuana” to “cannabis”; to authorize the Alcoholic Beverage Control Board to review security plans; to allow qualifying patients and their caregivers to purchase medical cannabis from any dispensary located in the District; to prohibit a cultivation center that owns a dispensary from charging the dispensary it has an ownership interest in a lower price than it charges other dispensaries; to increase the number of permitted dispensaries from 8 to 16; to allow 2 dispensaries in each ward; to allow testing laboratories to be located in any ward; to award preference points to returning citizens or District residents arrested or convicted for a marijuana offense or to veteran-owned business enterprises applying for a medical cannabis cultivation center, dispensary, or testing laboratory registration; to establish that medical cannabis registrations for cultivation centers, dispensaries, and testing laboratories are valid for 3 years with some exceptions; to authorize the Alcoholic Beverage Control Board to charge a late fee for each business day that a cultivation, dispensary, or testing laboratory registration has not been renewed by the conclusion of the renewal period; to eliminate the cultivation center plant count limit on a permanent basis; to remove the prohibition preventing individuals with a felony conviction for possession with intent to distribute marijuana from being a director, owner, officer, agent or employee of a cultivation center, dispensary or testing laboratory; to limit and reduce the prohibition timeframe for other felony convictions for directors, owners, officers, or agents of a dispensary, cultivation center, or testing laboratory to crimes of violence, a gun offense, tax evasion, fraud, or credit card fraud that have occurred within the last 3 years to apply for licensure; to remove the prohibition preventing individuals with a felony conviction from working at a dispensary, cultivation center, or testing laboratory; to create and allow dispensaries to obtain a safe use treatment facility endorsement to allow medical cannabis to be administered on-site to qualifying patients; to create and allow dispensaries to obtain an education tasting endorsement to offer cooking and how to classes and demonstrations and tastings for educational purposes to qualifying patients and caregivers on-site; to allow dispensaries to obtain a delivery endorsement that will allow them to deliver medical cannabis and offer curbside pickup to qualifying patients and caregivers; to clarify that the Alcoholic Beverage Control Board may issue and adjudicate fines to registered cultivation centers, dispensaries and testing

1 laboratories; and to require the Board to submit a proposed schedule of civil  
2 penalties to the Council within 120 days.

3  
4 BE IT ENACTED BY THE COUNCIL OF THE DISTRICT OF COLUMBIA,  
5 That this act may be cited as the “Medical Cannabis Amendment Act of 2021”.

6  
7 Sec. 2. The Legalization of Marijuana for Medical Treatment Initiative of 1999,  
8 effective February 25, 2010 (D.C. Law 13-315; D.C. Official Code § 7-1671.01 et seq.),  
9 is amended as follows:

10 (a) The phrase “medical marijuana” is replaced with the phrase “medical  
11 cannabis” and the phrase “marijuana” is replaced with the word “cannabis” where it  
12 appears.

13 (b) The table of contents is amended to add the following sections:

14 “Section 7a. Safe use treatment facility endorsement”

15 “Section 7b. Education tasting endorsement”

16 “Section 7c. Dispensary delivery endorsement.

17 (c) Section 6 (D.C. Official Code § 7-1671.05) is amended as follows:

18 (1) Paragraph (3) is amended by striking the phrase “that expire annually” where it  
19 appears.

20 (2) Paragraph (11)(c) is repealed.

21 (3) Paragraph (12) is amended as follows:

22 (A) Subparagraph (A) is amended by striking the phrase “District and  
23 federal law relating to marijuana” and inserting the phrase “District and federal law  
24 relating to cannabis and rules issued in accordance with section 14”.

25 (B) Subparagraph (D) is amended by striking the phrase “that has been  
26 assessed by the Metropolitan Police Department”.

1 (d)Section 7 (D.C. Official Code § 7-1671.06) is amended as follows:

2 (1) Subsection (c) is amended to read as follows:

3 “(c) A dispensary may dispense and deliver medical cannabis and distribute  
4 paraphernalia to any qualifying patient or the qualifying patient’s caregiver in the District  
5 of Columbia, and a qualifying patient or the qualifying patient’s caregiver shall only  
6 obtain medical cannabis and paraphernalia from a registered dispensary.”.

7 (2) A new subsection (c)(1) is added to read as follows:

8 “(c)(1) A cultivation center that also owns a dispensary shall be prohibited  
9 from charging the dispensary in which it has an ownership interest a lower price for  
10 medical cannabis or medical cannabis products than it charges other dispensaries.”

11 (3) Subsection (d) is amended as follows:

12 (A) Paragraph (2) is amended as follows:

13 (i) Subparagraph (A) is amended by striking the phrase “may increase  
14 the number to as many as 8” and inserting the phrase “may increase the number to as  
15 many as 16” in its place.

16 (ii) Subparagraph (C)(i) is amended by striking the phrase “no more than  
17 one dispensary” with the phrase “no more than 2 dispensaries” wherever it appears.

18 (iii) Subparagraph (C)(ii) is deleted.

19 (B) Paragraph (3)(A) is amended to read as follows:

20 “(3)(A) The number of cultivation centers and testing laboratories that may be  
21 registered to operate in the District shall be determined by the Mayor by rules issued in  
22 accordance with section 14; provided, that the total number of cultivation centers  
23 registered to operate within an election ward established by the Council in section 4 of

1 the Redistricting Procedure Act of 1981, effective March 16, 1982 (D.C. Law 4-87; D.C.  
2 Official Code § 1-1041.03), shall not exceed 6. There shall not be a limit on the number  
3 of testing laboratories operating within an election ward established by the Council in  
4 section 4 of the Redistricting Procedure Act of 1981, effective March 16, 1982 (D.C. Law  
5 4-87; D.C. Official Code § 1-1041.03).”

6 (C) Paragraph (5) is amended as follows:

7 (i) Subparagraph (A) is amended to read as follows:

8 “(A)An application for registration of a dispensary, cultivation center, or  
9 testing laboratory submitted by:

10 “(i) A District resident who is a veteran-owned business enterprise as  
11 defined in D.C. Official Code § 2-218.38 shall be awarded preference points equal to 10  
12 points or 4% of the available points, whichever is more;

13 “(ii) A returning citizen or a District resident who has been arrested or  
14 convicted for a cannabis offense shall be awarded preference points equal to 50 points or  
15 20% of the available points, whichever is more;

16 “(iii) A medical cannabis certified business enterprise, or applicant eligible  
17 to be a medical cannabis certified business enterprise, shall be awarded preference points  
18 equal to 50 points or 20% of the available points, whichever is more;or

19 “(iv) An applicant that is both a returning citizen and a medical cannabis  
20 certified business enterprise or also a veteran-owned business enterprise shall only  
21 receive preference points equal to 50 points or 20% of the available points, whichever is  
22 more.”.

23 (ii) Subparagraph (D) is amended by adding a new sub-subparagraph (iii)

1 to read as follows:

2 (iii) "Returning citizen" shall have the same meaning as defined in  
3 section 2 of The Office of Ex-Offender Affairs and Commission on Re-entry and Ex-  
4 offender Affairs Establishment Act of 2006, effective March 8, 2007 (D.C. Law 16-243;  
5 D.C. Official Code § 24-1301(5)), as amended."

6 (4) A new subsection (d-1) is added to read as follows:

7 "(d-1)(A) Dispensary, cultivation center, and testing laboratory registrations  
8 shall be paid annually by credit card or cashier's check, money order, or certified check  
9 made payable to the D.C. Treasurer. The fee for the first year shall be paid at the time of  
10 the application and the renewal fee shall be paid on or before the anniversary date of  
11 issuance of the registration. All payments are due at the time the applications are filed  
12 and are non-refundable.

13 "(B) The Board shall, by rule issued in accordance with section 14, establish  
14 or modify the initial application and renewal fees for dispensary, cultivation center, and  
15 testing laboratory registrations.

16 "(C) A dispensary, cultivation center, and testing laboratory registration shall  
17 be valid for 3 years, unless:

18 "(i) Suspended or revoked; or

19 "(ii) The registration takes effect on a date in between the dates established by  
20 the Board for the regular registration period of each registration, in which case the  
21 registration shall be valid only until the end of the registration period.

22 "(D) The Board may impose a late fee upon an applicant for a cultivation  
23 center, dispensary, or testing laboratory that fails to timely renew their registration in the

1 amount of \$50 for each business day after the due date of payment. The total amount of  
2 the late fee to be paid shall not exceed the annual cost of the registration. The Board may  
3 suspend a previously approved registration until the renewal fee is paid. A cultivation  
4 center, dispensary or testing laboratory that has not timely renewed its registration shall  
5 not be permitted to operate with an expired registration.

6 “(E) The Board may suspend a registration where the payment was made by  
7 the applicant with a check returned unpaid, invalid credit card, or any other form of  
8 payment that is denied by an intermediary institution. The applicant, in addition to any  
9 late fees imposed by the Board under paragraph (D), shall also be charged with a \$100  
10 returned check /denied payment fee.”.

11 (5) Subsection (e)(2) is repealed.

12 (6) Subsection (j) is amended to read as follows:

13 “(j)(1) No director, officer, member, incorporator, or agent of a dispensary,  
14 cultivation center, or testing laboratory who has access to the medical cannabis at the  
15 dispensary, cultivation center, or testing laboratory shall have a felony conviction for a  
16 crime of violence, a gun offense, or for tax evasion, fraud or credit card fraud within the 3  
17 years preceding the date the application is filed with ABRA; provided, that the ABC  
18 Board shall not disqualify any of the foregoing individuals solely for a felony conviction  
19 of possession with intent to distribute marijuana that occurred prior to the application  
20 being filed.

21 “(2) The ABC Board shall not disqualify an employee of a dispensary, cultivation  
22 center, or testing laboratory who has access to medical cannabis at the dispensary,  
23 cultivation center, or testing laboratory from working at the dispensary, cultivation

1 center, or testing laboratory solely because he or she has been convicted of a felony  
2 before filing the application.

3 “(3) The ABC Board may establish additional criminal background requirements  
4 by rulemaking for testing laboratory agents that are responsible for testing cannabis and  
5 cannabis products and may consult with other District agencies regarding an applicant’s  
6 record of adherence to other regulatory requirements before granting an application.”.

7 (e) New sections 7a, 7b, and 7c are added to read as follows:

8 “Section 7a. Safe use treatment facility endorsement

9 “(a) Notwithstanding any other provision in this chapter, the holder of a  
10 dispensary registration shall be eligible to apply to the Board for a safe use treatment  
11 facility endorsement. The holder of a safe use treatment facility endorsement shall be  
12 permitted to:

13 “(1) Sell medical cannabis and medical cannabis paraphernalia at the dispensary  
14 to qualifying patients or the qualifying patient’s caregiver to be administered on the  
15 registered premises by or to the qualifying patient at the time of purchase within  
16 designated consumption areas on the registered premises that are separated from the  
17 remainder of the registered premises by a secure door and having a separate ventilation  
18 system;

19 “(2) Allow a qualifying patient or the qualifying patient’s caregiver to remove  
20 from the registered premises unused medical cannabis or medical cannabis paraphernalia  
21 that has been purchased from the dispensary in accordance with the requirements and  
22 limits set forth in this title; provided that it is packaged in a sealed and secure and labeled  
23 container.



1 (3) Offer or sell food that does not contain cannabis in the safe use treatment  
2 facility; and

3 (4) Offer recorded or background music in the safe use treatment facility.

4 “(b) A dispensary with a safe use treatment facility endorsement shall not:

5 “(1) Allow a person to consume alcohol, tobacco or tobacco products in the safe  
6 use treatment facility;

7 “(2) Allow any member of the public other than a qualifying patient or the  
8 qualifying patient’s caregiver to enter into the safe use treatment facility;

9 “(3) Allow a person to bring into or administer in the safe use treatment facility any  
10 medical cannabis or medical cannabis products that were not purchased at the dispensary  
11 unless otherwise permitted by the Board by rulemaking;

12 “(4) Sell, offer to sell, or provide medical cannabis or medical cannabis  
13 paraphernalia in excess of the quantity limits set forth in this chapter or regulations issued  
14 in accordance with section 14;

15 “(5) Encourage or permit an organized game or contest on the registered premises  
16 that involves consuming cannabis or cannabis products or the awarding of cannabis or  
17 cannabis products; or

18 “(6) Advertise or promote in any way, either on or off the premises, a practice  
19 prohibited under this section.

20 “(c) A dispensary’s safe use treatment facility area shall have the following  
21 characteristics:

1           “(1) The area where medical cannabis is to be administered on-site by qualifying  
2 patients shall be isolated from the other areas of the dispensary, separated by walls and a  
3 secure door, and shall have access only from the dispensary;

4           “(2) A smoke-free area for employees to monitor the safe use treatment facility  
5 area; and

6           “(3) A ventilation system that directs air from the safe use treatment facility area  
7 to the outside of the building through a filtration system sufficient to remove visible  
8 smoke, consistent with all applicable building codes and regulations.

9           “(d) A dispensary with a safe use treatment facility endorsement shall:

10           “(1) Install security cameras that are operable and able to record for a minimum of  
11 30 days;

12           “(2) Display conspicuous warning labels that are visible to the qualifying patient  
13 and the qualifying patient’s caregiver concerning administering medical cannabis and  
14 medical cannabis products;

15           “(3) Destroy all unadministered medical cannabis left abandoned or unclaimed in  
16 the safe use treatment facility area; and

17           “(4) Package and label all medical cannabis or medical cannabis products  
18 purchased to be administered on the premises of the safe use treatment facility in  
19 accordance with regulations issued in accordance with section 14.

20           “(e) An applicant for a safe use treatment facility endorsement shall complete an  
21 application on a form the Board proscribes by regulations issued in accordance with  
22 section 14.

1           “(f) The initial application fee for the safe use treatment facility endorsement shall  
2 be \$1,000. The endorsement shall be valid for 3 years with an annual registration fee of  
3 \$2,000.

4           “Section 7b. Education tasting endorsement

5           “(a) Notwithstanding any other provision in this chapter, the holder of a  
6 dispensary registration shall be eligible to apply to the Board for an education tasting  
7 endorsement. The holder of an education tasting endorsement shall be permitted to offer  
8 cooking and how-to classes and demonstrations and tastings for educational purposes to  
9 qualifying patients and caregivers on-site. Activities offered by a dispensary under an  
10 education tasting endorsement shall be permitted to occur on the registered premises of  
11 the dispensary. However, educational activities that include the smoking of medical  
12 cannabis by qualifying patients shall only occur in a Board-approved safe use treatment  
13 facility.

14           “(b) A dispensary with an education tasting endorsement shall not:

15           “(1) Allow a person to consume alcohol, tobacco or tobacco products on the  
16 registered premises;

17           “(2) Allow a qualifying patient or caregiver to leave the registered premises with  
18 medical cannabis that was made available or offered as part of the educational activity; ;

19           “(3) Advertise or promote in any way, either on or off the premises, a practice  
20 prohibited under this section; or

21           “(4) make unsubstantiated medical claims about cannabis or cannabis products.

22           “(c) A dispensary holding educational activities shall:

1           “(1) Display in the registered area conspicuous warning labels that are visible to  
2 the qualifying patient and the qualifying patient’s caregiver concerning the consumption  
3 of medical cannabis and medical cannabis products;

4           “(2) Destroy all unconsumed medical cannabis remaining from the educational  
5 activity; and

6           “(3) Ensure that containers of medical cannabis to be used for educational  
7 activities are labeled as such and may not be sold.

8           “(d) The holder of the dispensary registration may offer educational activities on  
9 the registered premises between the hours of 7:00 a.m. and 9:00 p.m., 7 days a week.

10           “(e) The Board shall establish by regulation permitted medical cannabis tasting or  
11 consumption limits for educational activities.

12           “(f) An applicant for an education tasting endorsement shall complete an  
13 application on a form the Board proscribes by regulations issued in accordance with  
14 section 14.

15           “(g) The initial application fee for an education tasting endorsement shall be  
16 \$130. The endorsement shall be valid for 3 years with an annual registration fee of  
17 \$130.”.

18           “Section 7c. Dispensary delivery endorsement.

19           “(a) Notwithstanding any other provision in this chapter, the holder of a  
20 dispensary registration shall be eligible to apply to the Board for a delivery endorsement.  
21 The holder of a delivery endorsement shall be permitted to offer curbside pickup and  
22 deliver medical cannabis directly to a qualifying patient or the qualifying patient’s  
23 caregiver at residential and commercial building addresses located in the District that are

1 not on District government or Federal property or public or private school grounds. For  
2 purposes of this section, a public or private park shall not be considered to be either a  
3 residential or commercial building address.

4 “(b) A dispensary with a dispensary delivery endorsement shall:

5 “(1) Receive and only accept an order by electronic or other means from a  
6 qualifying patient or the qualifying patient’s caregiver;

7 “(2) Deliver only to the qualifying patient or the qualifying patient’s caregiver at  
8 the District of Columbia address provided on the order and shall not “drop off” the  
9 product without verifying the identity of the recipient;

10 “(3) Deliver no more than once per day to the qualifying patient or the qualifying  
11 patient’s caregiver;

12 “(4) Travel only through the District of Columbia and not any surrounding  
13 jurisdiction to make deliveries;

14 “(5) Abide by the rules posted of any landlord or property owner with respect to  
15 prohibitions on cannabis deliveries on its property;

16 “(6) Abide such rules and standards as may be established by the Board  
17 concerning lack of advertisements and cannabis-related logos on the vehicles used for  
18 delivery; and overnight storage of any product if necessary; and

19 “(7) Use its employees to deliver medical cannabis or medical cannabis products.

20 “(c) At the time of the order, a dispensary with a delivery endorsement shall  
21 require the qualifying patient or the qualifying patient’s caregiver to provide information  
22 necessary to verify that the qualifying patient or the qualifying patient’s caregiver is  
23 qualified to purchase and receive a delivery of medical cannabis or medical cannabis

1 products in accordance with this chapter and regulations issued in accordance with  
2 section 14.

3 “(d)(1) Prior to transferring possession of the order to a qualifying patient or the  
4 qualifying patient’s caregiver, the dispensary shall inspect the qualifying patient’s or his  
5 or her caregiver’s government issued identification card and registration identification  
6 card issued pursuant to this chapter to verify the possession of a valid registration  
7 identification card and that the information provided at the time the order was placed  
8 matches the information listed on the government issued identification card.

9 “(2) The dispensary’s failure to check the qualifying patient’s or his or her  
10 caregiver’s government issued identification card and registration identification card  
11 information in accordance with paragraph (1) of this subsection may result in the Board  
12 issuing a fine against the dispensary or suspending or revoking its registration in  
13 accordance with this chapter or regulations issued in accordance with section 14.

14 “(e) A dispensary with a delivery endorsement shall maintain, in each vehicle  
15 used for deliveries of medical cannabis or medical cannabis products, a secure, locked  
16 storage compartment for purposes of transporting and securing cash used as payment and  
17 the medical cannabis or medical cannabis products. The dispensary shall not store cash  
18 and medical cannabis or medical cannabis products in the same storage compartments.

19 “(f) A dispensary with a delivery endorsement shall be limited to the number of  
20 vehicles established by the Board by regulations issued pursuant to section 14.

21 “(g) A dispensary with a delivery endorsement shall only be permitted to dispense  
22 medical cannabis or medical cannabis products through curbside pickup or at-the-door

1 pickup to a qualifying patient or caregiver if the dispensary complies with the following  
2 requirements:

3 (1) A dispensary shall only be permitted to dispense medical cannabis through  
4 curbside pickup or at-the-door pickup to a qualifying patient or caregiver registered in the  
5 Program or a qualifying patient enrolled in another jurisdiction's medical cannabis  
6 program;

7 (2) A dispensary shall implement a mechanism or process for a qualifying patient  
8 or caregiver to submit a copy of the qualifying patient's or caregiver's medical cannabis  
9 registration card and valid government issued identification card to the dispensary for  
10 verification prior to dispensing;

11 (3) The dispensary shall ensure that the entire exchange of medical cannabis or  
12 medical cannabis products to the qualifying patient or caregiver is clearly captured on the  
13 dispensary's video surveillance system;

14 (4) The dispensary shall only provide curbside pickup at curbside directly in front  
15 of the dispensary and in view of the dispensary's video surveillance cameras. If the  
16 dispensary's location or video surveillance system is not equipped to meet this  
17 requirement, the dispensary shall not provide curbside pickup or at-the-door pickup.

18 (5) The dispensary shall implement procedures to ensure that curbside pickup or  
19 at-the-door pickup is completed quickly and efficiently; and

20 (6) The dispensary shall implement a mechanism or recordkeeping process for  
21 qualifying patients or caregivers to document receipt of curbside pickup or at-the door  
22 pickup.

1           “(h) The holder of the delivery endorsement may offer curbside pickup or deliver  
2 medical cannabis during the hours of 9:00 a.m. to 9:00 p.m., 7 days a week.

3           “(i) Applicants for the dispensary delivery endorsement shall complete an  
4 application proscribed by the Board by regulations issued pursuant to section 14.

5           “(j) The initial application fee for the endorsement shall be \$300. The  
6 endorsement shall be valid for 3 years with an annual registration fee of \$300.”.

7           (e) Section 9 (D.C. Official Code § 7-1671.08) is amended as follows:

8                 (1) Subsection (d) is amended to read as follows:

9                 “(d) The ABC Board may impose and adjudicate civil fines for violations  
10 of this title and rules issued in accordance with section 14 committed by registered  
11 cultivation centers, dispensaries, and testing laboratories.

12                 (2) A new subsection (e) is added to read as follows:

13                 “(e) Within 120 days of the effective date of the act, the ABC Board shall  
14 submit proposed regulations setting forth a schedule of civil penalties and fine ranges  
15 (“schedule”) for violations of this title for a 90-day period of review, including Saturdays,  
16 Sundays, holidays, and periods of Council recess. If the Council does not approve, in  
17 whole or in part, the proposed regulations within the 90-day review period, the  
18 regulations shall be deemed approved. The schedule shall replace all civil penalties,  
19 except as expressly provided in this title.

20           Sec. 3. Fiscal impact statement.

21           The Council adopts the fiscal impact in the committee report as the fiscal impact  
22 statement required by section 4a of the General Legislative Procedures Act of 1975 of  
23 1975, approved October 16, 2006 (120 Stat. 2038; D.C. Official Code § 1-301.47a).



1           Sec. 4. Effective date.

2           This act shall take effect following approval by the Mayor (or in the event of veto  
3 by the Mayor, action by the Council to override the veto), a 30-day period of  
4 congressional review as provide din section 602(c)(1) of the District of Columbia Home  
5 Rule Act, approved December 24, 1073 (87 Stat. 813; D.C. Official Code § 1-  
6 206.02(c)(1)), and publication in the District of Columbia Register.

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE ATTORNEY GENERAL



ATTORNEY GENERAL  
KARL A. RACINE

Legal Counsel Division

MEMORANDUM

**TO:** Ronan Gulstone  
Director  
Office of Policy and Legislative Affairs

**FROM:** Brian K. Flowers  
Deputy Attorney General  
Legal Counsel Division

**DATE:** February 25, 2021

**SUBJECT:** Legal Sufficiency Review of Draft Bill, the “Medical Cannabis Amendment Act of 2021”  
(AE-21-197)

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**This is to Certify that** this Office has reviewed the above-referenced draft legislation and found it to be legally sufficient. If you have any questions in this regard, please do not hesitate to call me at 724-5524.

*BKF/a.parker*  
\_\_\_\_\_  
Brian K. Flowers