MARIJUANA IN THE MILE-HIGH CITY

Marley Bordovsky
Assistant Director
Prosecution & Code Enforcement
Denver City Attorney’s Office
Overview

- History
- Licensing
- Types of Licenses
- Zoning/location
- Taxation
- Banking
- Ethics
- Other complications
- Resources
Marijuana Remains Illegal Under Federal Law

- Marijuana is classified as a Schedule I drug under the Controlled Substances Act
- Cultivation and distribution are felonies
- Possession for personal use is a misdemeanor
- Cultivating 100 plants or more carries a mandatory minimum sentence of 5 years
- State laws or local ordinances are not a defense to civil or criminal enforcement of federal laws
- But the federal government has allowed state legalization to proceed...
The National Landscape

- Starting with California in 1996, 23 states along with the District of Columbia and Guam have legalized marijuana for medical purposes.

- In 2012, Colorado and Washington became the first two states to legalize adult recreational use of marijuana, retail sales, and commercial production of marijuana.

- In 2014, the voters of Oregon, Alaska, and the District of Columbia followed suit.
Status of marijuana laws in the United States

Legalized
Medical
Decriminalized
Medical and decriminalized
Fully illegal

Source: NORML, Drug Policy Alliance, and the Marijuana Policy Project
2000: Voters passed Amendment 20 to the Colorado Constitution

Amendment 20 allowed for the medical use of marijuana to persons suffering from debilitating medical conditions and their primary caregivers

Authorized patients or primary caregivers to possess limited amounts of marijuana

Distribution of marijuana was still illegal in Colorado

The world of medical marijuana remained unregulated for another 10 years
2009: MMJ dispensaries began to proliferate after the DOJ released the Ogden Memo → prosecuting marijuana cases would be the federal government’s lowest priority.

This prompted the State and the City to develop their medical marijuana codes

In September 2014, there were 116,287 registered medical marijuana patients

In July 2014, 251 of those patients were minors under 18

In September 2014, that number rose to 427 under 18
MEDICAL MARIJUANA

Am 20 Provides an Exception to State’s Criminal Laws

... For any patient or primary care-giver in lawful possession of a registry identification card to engage or assist in the medical use of marijuana...

- “Medical Use” is the acquisition, possession, production, use, or transportation of MJ or paraphernalia

Sec. 14, Paragraph(2)(b)
MEDICAL MARIJUANA

Am 20 Provides an Affirmative Defense when...

1) Diagnosis by a physician of a debilitating medical condition

2) Patient advised by his physician, in the context of a bona-fide patient/physician relationship, patient might benefit from medical marijuana...

3) The patient and his care-giver were collectively in possession of marijuana only as permitted ...

Sec. 14, Paragraph(2)(a)(I)(II)(III)
MEDICAL MARIJUANA
Amendment 20 provisions

- No more than 2 oz. of marijuana, and

- Six plants (with three or less being mature, flowering, producing plants)

- Or... defense that possession of greater amounts was “medically necessary”

Sec. 14, Paragraph(4)(a)(I)(II)(b)
MEDICAL MARIJUANA

Regulation

- **2010:** Denver adopted first MMJ licensing ordinance
  - Addressed only “dispensaries,” not cultivation or manufacturing operations

- **2010:** Colorado adopted MMJ Code
  - Lengthy transition period ...
  - Only MMJ businesses that were locally approved as of July 1, 2010 could qualify for MMJ licensing over the next two years.

- **2011:** Denver updated its MMJ licensing ordinance to conform to state law
MEDICAL MARIJUANA

- Original Medical Marijuana Registry Identification Cards
- Changed in 2014 to driver’s license type cards
The Colorado Medical MJ Code (C.R.S. §12-43.3-101 et seq)

- Licenses and regulates three types of MJ businesses:
  - Medical Marijuana Centers (Dispensaries)
  - Medical Marijuana Optional Premise Cultivation Facilities (OPCs)
  - MJ-Infused Products Manufacturers (MIPs)
2012: Amendment 64 was petitioned onto the ballot and added an amendment to the Colorado constitution legalizing the personal, private use of marijuana

Passed in Colorado by about 55% of the vote & in Denver by 66%

Allows adults over 21 to:
- Possess up to one ounce of marijuana
- Possess and grow up to six marijuana plants, only 3 of which can be flowering
- Transfer up to 1oz of MJ between adults without payment
- Private consumption of MJ
- Assist another adult in any of these acts
Local control provisions

A64 also gave authority for cities and counties to opt-out of commercial marijuana licensing entirely.
Within days of the passage of Amendment 64, Colorado Governor Hickenlooper and Colorado Attorney General Suthers asked US Attorney General Holder for guidance as to what the federal response will be.

But Colorado and Washington were forced to move ahead with implementation of these unprecedented laws in the face of uncertainty:

- 2013: Colorado Retail Marijuana Code
- 2013: Denver Retail Marijuana Code
- January 1, 2014: First sales of retail marijuana from licensed facilities
On August 29, 2013, the DOJ issued a memo from Deputy Attorney General James Cole providing guidance to federal prosecutors concerning marijuana enforcement under the Controlled Substances Act in light of state legislation.

- DOJ announced that they were not going to preempt Colorado and Washington’s ballot initiatives, but expected the states to implement strong and effective regulatory and enforcement systems.

- Directed DOJ attorneys and law enforcement to focus their resources on conduct that interferes with any of the **Cole Memo Priorities**.
The “Cole Memo Priorities” = Preventing:

- Distribution to Minors
- Revenue going to criminal enterprises, gangs, and cartels
- Diversion of marijuana from states where it is legal under state law
- State-authorized activity being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity
The "Cole Memo Priorities" = Preventing:

- Violation and the use of firearms in the cultivation/distribution of marijuana
- Drugged driving and the exacerbation of adverse public health consequences associated with marijuana use
- Growing of marijuana on public land
- Marijuana possession or use on federal land

*Denver* also used these federal priorities as guidance when establishing regulation and enforcement policies.
AMENDMENT 64
Retail Marijuana

- Governor created task force to consider policy, legal, and procedural issues on the implementation of Am. 64
- Task Force issued report with 58 recommendations
- Recommended robust regulatory scheme with adequate funding for industry oversight and enforcement, consumer protection, and prevention and treatment programs for youth
Colorado had just over one year to:

- Pick a regulatory model
- Pass legislation implementing it
- Conduct rulemaking, and
- Go through all the licensing and inspections
Mayor Hancock Identified 3 Guiding Principles:

- Regulation
- Enforcement
- Education

Denver Also Created an A64 Committee
To implement local laws and regulations at the same time
To operate a licensed marijuana business in Colorado, you must have BOTH a state license AND a local license.

The Colorado Marijuana Enforcement Division (MED) licenses and regulates marijuana businesses for the state.

The Denver Department of Excise and Licenses (EXL) licenses and regulates for the city.
Marijuana Licensing in Denver

Retail Marijuana Business License Application Process

- State receives RMU application & fees
- State reviews application
- MMJ Licensed by 3/1/13? (Yes/No)
- MMJ Fees Paid? (Yes/No)
- Application complete? (Yes/No)
- State issues CO RMU license

- City and County of Denver
  - City and County of Denver Department of Action and Otitis
  - EXL issues City license

- Business and License Hearing Officer & Director
The Marijuana Enforcement Division (MED)

- MED created by state statutes:
  - Colorado Medical Marijuana Code
    C.R.S. §12-43.3-101
  - Colorado Retail Marijuana Code
    C.R.S. §12-43.4-101

- MED operates within the Colorado Department of Revenue

- Promulgated separate rules:
  - Medical (1 C.C.R. 212-1)
  - Retail (1 C.C.R. 212-2)
The Colorado Retail MJ Code

(C.R.S. §12-43.4-101 et seq)

- Licenses and regulates four types of retail MJ businesses:
  - Retail Marijuana Stores
  - Retail Cultivation Facilities
  - Marijuana Products Manufacturers
  - Marijuana Testing Labs
Issues and regulates all local licenses:

- Denver Medical Marijuana Code
  D.R.M.C. §24-501
- Denver Retail Marijuana Code
  D.R.M.C. §6-200
Types of Marijuana Licenses
4 Types

Centers/Stores
(RMJ & MMJ)

Grow Operations
(RMJ & MMJ)

Photo credits: cannabisnews.com; CBS
Types of Marijuana Licenses

4 Types

MIP Kitchens
(RMJ & MMJ)

Testing Labs
(RMJ only)

Photo credits: vice.com; denverpost.com
Cultivation/Grow Facilities
Infused Products Manufacturers
Marijuana Testing Facilities

Recently Tested Medical Marijuana Strains

**Gorilla Purple**
Kern River Collective
THC: 10.41%
CBD: 0.52%
CBN: 0.87%
2 weeks ago

**OG**
Adjuster
THC: 12.80%
CBD: 0.50%
CBN: 0.77%
3 days ago

**Platinum Kush**
C.A.R.E. Alternative Meds
THC: 16.00%
CBD: 0.25%
CBN: 0.88%
1 week ago

**Da Vapors OG**
Vapors
THC: 20.12%
CBD: 0.31%
CBN: 0.62%
1 week ago

\[ \Delta-9\text{-tetrahydrocannabinol (THC)} \]
Marijuana Licensing
Includes people too

- “Owners” must be approved
  - Colorado has a stringent two-year minimum residency requirement for any owner or investor

- Licensing required
  - Businesses
  - Employees
  - Lab Directors
Marijuana Licensing
Includes people too

- All owners, employees, vendors, support personnel in the marijuana industry must obtain an occupational license through the MED.
- Only badged employees can enter restricted access areas of the marijuana business.
Retail Marijuana Licensing

Some Denver wrinkles

- Until January 1, 2016, only *medical* MJ businesses that were duly licensed as of October 1, 2013 are eligible for *retail* licensing in Denver.

- They can either completely convert or obtain a retail marijuana license in addition to their MMJ license and operate both types of businesses at the same location.
## Denver Marijuana Facilities*

<table>
<thead>
<tr>
<th>Type</th>
<th>Combined (Med and Retail)</th>
<th>Retail Only</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marijuana Centers/Stores</td>
<td>308</td>
<td>103</td>
</tr>
<tr>
<td>Marijuana Grow Facilities</td>
<td>515</td>
<td>152</td>
</tr>
<tr>
<td>Marijuana Products Manufacturers</td>
<td>108</td>
<td>39</td>
</tr>
<tr>
<td>Retail Marijuana Testing Facilities</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>938</strong></td>
<td><strong>301</strong></td>
</tr>
</tbody>
</table>

- Retail and Medical can be co-located, so there are more licenses than physical locations.
- Most recent data shows 574 unique marijuana addresses in Denver.

*As of November 2014
Permitted Locations

Department of Excise and Licenses (EXL)
Community Planning & Development (CPD)
Two key policy decisions have shaped how Denver has defined the lawful location of MJ businesses:

(1) Denver made conscious decision not to regulate MJ businesses as a distinct category of land use in the Zoning Code itself.

Instead, location restrictions on MJ businesses are entirely reflected in the licensing laws, which in turn cross-reference the Zoning Code.
(2) Denver made conscious decision to “grandfather” business locations that existed before licensing regulations were put in place.

This became necessary because of the 10 years that had elapsed without any formal regulation by either the state or the city.
2010-2011: While Colorado and Denver were enacting MJ licensing laws, Denver was coincidentally adopting its new 2010 Zoning Code.

And the updated MMJ licensing ordinance contained zoning restrictions that prohibited MMJ stores in some locations where dispensaries had previously been allowed.
So if a business had already received MMJ license under the old 2010 licensing ordinance, the location was “grandfathered” and eligible for licensing as an MMJ business under new state and city licensing laws.

But only if the business “had existed in continuous operation” at the location since the time of original licensing.
PROHIBITED LOCATIONS
Medical and Retail MJ Stores

- Any residential zone district
- Any “embedded retail” districts
- Any location where retail sales are prohibited
- Within 1000’ of any school or child care establishment
- Within 1000’ of any alcohol or drug treatment facility
- Within 1000’ of any other MMJ Center or MMJ Dispensary or any RMJ store

D.R.M.C. 24-508 and 6-211
To complicate matters even more, the 1000’ distance is computed differently for MMJ Centers vs. Retail Stores.

- **Schools/Child Care** — from nearest property line of land used for school/child care purposes to nearest portion of the building where MMJ Center is located, using a **route of direct pedestrian access**.

- **Alcohol/Drug Rx Facility** — from nearest property line of land used for treatment purposes to the nearest portion of the property where MMJ Center is located, using a **route of direct pedestrian access**.

- **Another MJ Store** — from nearest portion of building where one store is located to nearest portion of building where the other store is located, computed by **direct measurement in a straight line**.
PROHIBITED LOCATIONS

Retail Marijuana Stores

- **Schools** – from nearest property line of land used for school to nearest portion of the building where RMJ store is located, computed by *direct measurement in a straight line*

- **Child Care & Alcohol/Drug Rx Facility** – from nearest property line of land used for child care or treatment purposes to the nearest portion of the property where RMJ Store is proposed to be located, computed by *direct measurement in a straight line*

- **Another MJ Store** – from nearest portion of building where one store is located to nearest portion of building where the other store is located, computed by *direct measurement in a straight line*
Both Denver’s retail and medical MJ licensing codes allow licensing for cultivation facilities in any location where “plant husbandry” is a permitted use

BUT locations are Grandfathered in if:

- Applied for plant husbandry zoning permit before 7/1/10
- Applied for OPC license with State before 8/1/10
- Evidence that cultivation of MJ started before 1/1/11
COMPLICATIONS

- Licensed MIPS and Grows doing extractions
- **Extraction problems** – residential/unlicensed
- “Primary Caregivers” and Co-op arrangements
- Public Consumption
- Child Care Facilities
- Underage use of Marijuana
- Pot Social Clubs
- Advertising
- Odor complaints
- DEH MJ-infused products - botulism problem
- Edibles – potency issues
- **Unsafe conditions** – enforcement/compliance problems (DEH, DFD, CPD
Context – The Legal Zones of Marijuana

- Licensed MJ Businesses
  - Centers, Grows, MIP’s & Labs

- “Care-Givers” who grow for others- 5 or less “patients” (in theory)

- Individuals who “assist others” under 64 (Rec)

- Individual possession and cultivation under Amendment 20 (Med) and 64 (Rec)
So what’s legal and what’s not?
Federal priority to keep it out of the hands of youth. Police have conducted “stings” and only two stores have been caught selling to minors.

In Denver, backyards and patios are considered “private”. Parks, bars, and movie theaters are considered public spaces.

Able to “give away” up to 1 ounce but illegal to sell it outside of a licensed facility.

18 or older for medical marijuana

Police have Drug Recognition Experts that can assess the condition of a driver.

Can purchase if you are a non-resident visiting Colorado but you cannot take it home with you (across State lines).
Marijuana Infused Products Manufacturer (MIPS) are the commercial kitchens that are making marijuana edibles like brownies and candy bars.

Both Denver’s retail and medical MJ licensing codes allow licensing for MIPS on any zone lot where “food preparation and sales” or “manufacturing, fabrication and assembly – general” are permitted under the Denver Zoning Code.

This has become a problem....
COMPLICATIONS
HASH OIL EXTRACTION

- When Denver first decided to allow MIPS in those two zone districts, it was thinking of kitchens or bakeries
- MJ Brownies being made by chopping up the leaves of MJ plants
- Or MJ plants being pureed in a blender
- **Who knew......?**
What do we do when a MIP wants to start doing extractions?

Is that still “food preparation and sales”?
Solvent-based Extractions

- Since January 2014, there have been 32+ hash oil explosions throughout Colorado
- Eight explosions in Denver
- Seven have been in unlicensed facilities
- One was in a licensed facility that hadn’t been approved for extractions
BHO Extractions
Solvent-based Extractions

- Given the amount of flammable solvents being used in these extraction processes, these operations are more properly suited for a “Manufacturing – Heavy” zone district.

- And should never be allowed in residential or unregulated locations.
Extraction Operations

- It shall be unlawful for any person to process or manufacture marijuana concentrate in the city by any means other than water-based or food-based extraction, except in a licensed medical marijuana-infused products manufacturing facility or in a licensed retail marijuana products manufacturing facility.
Means a person, other than the patient and the patient’s physician, who is eighteen years of age or older and has significant responsibility for managing the well-being of a patient who has a debilitating medical condition.

**FACTS**

- Longmont PD receives tip of “come and go” traffic out of house
- Utility usage 4x normal
- Trash run – Three marijuana stalks
- Search warrant
- Two grow rooms with four kinds of marijuana because she suffered from migraines
- Guilty: Cultivation, Possession with Intent, Possession of MJ Concentrate, Possession of MJ
We conclude that to qualify as a “primary care-giver” [under the Colorado Constitution] a person must do more to manage the well-being of a patient who has a debilitating medical condition than merely supply marijuana. *212

C.R.S. §25-1.5-106

- Two or more care-givers shall NOT team up to cultivate
- Shall provide law enforcement with registry ID card number of each patient
- Shall not have more than five patients (unless exceptional circumstances)
Patient may have only ONE caregiver at one time

A patient who designates a caregiver, cannot be a caregiver

Caregiver cannot charge a patient more than the value of the med marijuana except for “caregiver services”
A primary caregiver who cultivates medical marijuana for his/her patients shall register the location of his or her cultivation operation with the licensing authority and provide the registry ID for each patient:

- No punishment
- No active caregiver registry
Marijuana is a Schedule I controlled substance, which means:

- High potential for abuse.
- No currently accepted medical use in treatment in the U.S.
- Lack of accepted safety for use of the drug under medical supervision.

Little research exists because the federal government continues to deny funding.

- Two pharmaceutical companies are beginning first clinical studies.
- Only one “marijuana garden” in the U.S. for federally sanctioned studies.
- DEA recently raised the cap of marijuana allowed to be grown there – for current and anticipated research efforts.
Medical Marijuana
“Charlotte’s Web”

- Families with a child suffering from specific types of epilepsy have been moving to Colorado.

- In August of 2014, 55 of the 3,906 newly registered medical marijuana patients were minors.
  - Total number of minor patients is now 406, up from 60 minor patients just one year ago.

- Vocal constituency claims that some forms of marijuana with low THC levels (the psychoactive ingredient) and **high levels of CBD** can be very effective to treat some forms of epilepsy.
Medical Marijuana

“Charlotte’s Web”

- There is little to no knowledge of the potential long-term effects of marijuana on a developing brain, including memory and learning abilities.

- Colorado’s Governor Hickenlooper recently signed a bill stating the Colorado Health Department will give out $9 million in grants in the next five years to researchers for marijuana studies.
We have had two cases in Colorado involving MJ edibles and potential potency issues – 1 homicide and 1 apparent suicide.

- 10mg serving size of active THC in each package
- Unless it can be scored/separated into 10mg servings
- Child resistant packaging at manufacturing
- Make products readily identifiable
- Labeling
COMPLICATIONS
COMPLICATIONS
COMPLICATIONS

The Black Market

- “Mexican ditch weed” (3-4% THC) = $300/lb
- Colorado-grown MJ (25%+ THC) = $2000/lb (in Colo)
- Colorado-grown MJ on the East Coast = $5500/lb
COMPLICATIONS
Dangers in Unlicensed Grows

- **Water** – large amounts (damage)
  - Water + heat + humidity = **MOLD**

- **CO2** – 4 times the CO2 can result in 4 times the yield
  - Detached venting
  - CO2 generators/burners/bottles

- **Sulfur** – burned to control insects

- When sulfur is burned, it creates sulfur dioxide

- When sulfur dioxide mixes with enriched CO2, it creates hydrogen sulfide
COMPLICATIONS
Electrical and Fire Dangers

- Dangerous wiring
- Electrical Overloads
- Stealing Electricity
COMPLICATIONS

- Licensed MIPS and Grows doing extractions
- Extraction problems – residential/unlicensed
- “Primary Caregivers” and Co-op arrangements
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- DEH MJ-infused products - botulism problem
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- Unsafe conditions – enforcement/compliance problems (DEH, DFD, CPD, EXL, Zoning)
Retail Marijuana Sales

The amount of marijuana sold in the State of Colorado has been steadily increasing since January 1, 2014. In July, retail sales outpaced medical sales for the first time. This trend continued into August and September.

<table>
<thead>
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<th></th>
<th>June</th>
<th>July</th>
<th>August</th>
<th>October</th>
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<tbody>
<tr>
<td>Retail</td>
<td>$24.7 million</td>
<td>$29.7 million</td>
<td>$32.9 million</td>
<td>$32 million</td>
</tr>
<tr>
<td>Medical</td>
<td>$28.6 million</td>
<td>$28.9 million</td>
<td>$32.2 million</td>
<td>$33 million</td>
</tr>
<tr>
<td>Total</td>
<td>$53.3 million</td>
<td>$58.6 million</td>
<td>$62.1 million</td>
<td>$65 million</td>
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</tbody>
</table>
Retail Marijuana Taxes

- Denver established a special sales tax on retail marijuana (3.5%)
- The ballot stated that the purpose of the tax was to raise funds for the payment of expenses related to:
  - Licensing and regulation of the retail marijuana industry
  - Educational and public health programs to mitigate any negative consequences associated with the consumption of marijuana and marijuana products
  - Programs to prevent the illegal diversion of marijuana and marijuana products to persons under the age of 21
  - To otherwise pay the expenses of operating and improving the city and its facilities
Retail Marijuana Taxes

- The State of Colorado also has a special sales tax on retail marijuana, in addition to all of the standard sales taxes.
- Broken down, in Denver for 2014, the retail marijuana tax rates will be as follows:
  - 7.12% Denver Sales Tax (3.5% special tax and 3.62% standard sales tax)
  - 12.90% State Sales Tax (10% special tax and 2.9% standard sales tax)
  - 1.00% RTD Sales Tax
  - 0.10% cultural Facilities District

- Total Denver Marijuana Sales Tax: 21.12%
Retail Marijuana Taxes

2014 Retail Marijuana Revenue-City of Denver

Special Retail Sales Tax $4,800,000
State Share-back $1,500,000

2014 Total-Revenue* $6,300,000

- BUT, pending lawsuit....
  - Paying taxes on marijuana violates our right against self-incrimination (relying on Leary v. United States, 395 U.S. 6 (1969))
  - Paying taxes on marijuana is unconstitutional because it taxes products that are illegal under federal law
Colorado has passed legislation regarding the creation of local “cannabis credit co-ops” as a way to force federal authorities to decide definitively whether the industry can access critical banking services.

The legal marijuana industry is hampered by a lack of access to bank accounts and business loans.

Many marijuana businesses are “cash only,” making them vulnerable to crime.

A stack of $100 bills sits on a table after being collected by the Colorado-based marijuana-cash management company Blue Line Protection Group. (Photo: Trevor Hughes/USA TODAY)
On February 14, 2014, the Financial Crimes Enforcement Network ("FinCEN") released new "Guidance" that clarifies how bankers can provide financial services to marijuana businesses consistent with their obligations under the Bank Secrecy Act.
FinCEN will follow the DOJ’s lead and pursue a policy of non-enforcement of certain federal laws.

It leaves to each bank the decision whether to provide financial services to a marijuana business, after conducting due diligence to get to know its customer.

Banks still must file Suspicious Activity ("SARs") in connection with transactions known or suspected to involve the sale of marijuana and must conduct ongoing due diligence.
Outside of Colorado and Nevada, rules of professional conduct generally **prohibit “counseling to or assisting clients” in the commission of a federal crime.**

Thus, lawyers in most states are limited in their ability to assist with transactional matters for marijuana businesses in states that have legalized it.

But lawyers anywhere can advise a client about the tension between state and federal marijuana laws or represent a client who wishes to lobby for a change in either.
Rule 1.2. Scope of Representation and Allocation of Authority Between Client and Lawyer

Comment

[14] A lawyer may counsel a client regarding the validity, scope, and meaning of Colorado constitution article XVIII, secs. 14 & 16, and may assist a client in conduct that the lawyer reasonably believes is permitted by these constitutional provisions and statutes, regulations, orders, and other state or local provisions implementing them. In these circumstances, the lawyer shall also advise the client regarding related federal law and policy.
Colorado MED Licensing and Regs:

Denver Licensing:
http://www.denvergov.org/businesslicensing/DenverBusinessLicensingCenter/RetailMarijuana
http://www.denvergov.org/businesslicensing/DenverBusinessLicensingCenter/BusinessLicenses/MedicalMarijuanaCenters
Colorado Department of Public Health and Environment
https://www.colorado.gov/pacific/cdphe/categories/services-and-information/marijuana

Denver MMJ Dispensary Ordinance
https://library.municode.com/index.aspx?clientId=10257

Denver Medical MJ Code
https://library.municode.com/index.aspx?clientId=10257

Denver Retail MJ Code
https://library.municode.com/index.aspx?clientId=10257
Colorado Medical Marijuana Code
C.R.S. 12-43.3-101 et seq

Colorado Retail Marijuana Code
C.R.S. 12-43.4-101 et seq

Colorado CDPHE Medical MJ Program
C.R.S. 25-1.5-106

Colorado CDPHE MMJ Health Research
C.R.S. 25-1.5-106.5
MARLEY BORDOVSKY
Assistant Director
Prosecution and Code Enforcement
Denver City Attorney’s Office
(720) 913-8057
Marley.Bordovskky@denvergov.org
QUESTIONS?