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Colorado Springs City Council  
107 North Nevada Avenue  
Colorado Springs, CO 80903

December 15, 2014

To the Colorado Springs City Council,

The Marijuana Industry Group is a trade association founded in 2010. Our members are Colorado licensed marijuana businesses. Our mission is to build a comprehensive and robust regulatory structure for the sale of cannabis in Colorado.

We write today in support of the proposed ordinance that would ban the residential manufacturing of marijuana oils with flammable gases. As you have likely seen in the media, this problem has resulted in dozens of explosions, many injuries, and further potential to harm or kill neighbors.

Under Amendments 20 and 64, there are legal ways to manufacture concentrates within a home. Many medical marijuana caregivers manufacture highly concentrated oils for people with debilitating conditions, and their rights should be protected.

However, many black market operators are using the caregiver model as cover to illegally grow, manufacture, and sell marijuana. To say the least, the caregiver model has been heavily abused. Hash oils often are illegally diverted to other states. This ordinance is an important step in limiting the black market manufacturing and sale of hash oil.

The state and local licensing authorities have created several hundred pages of regulations in order protect public safety. State and local licensing fees, along with taxes, help ensure that our products are safe and clean, and provide additional revenue for the City. Further, we must complete inspections with the Colorado Springs Fire Department, and other governmental entities to ensure our process is safe. Our businesses often spend hundreds of thousands of dollars purchasing safe and compliant equipment, and finding suitable licensed locations. The licensed businesses also spend enormous sums of money on consumer safety measures such as child resistant packaging, labeling, and testing.

It is very frustrating for licensed industry players to see black market operators manufacturing these oils with little to no enforcement. We hope that the City of Colorado Springs, and the State of Colorado, will take additional steps to protect the public and address these illegal activities.

As it stands, Colorado Springs has chosen to ban *licensed* recreational marijuana sales. However, prohibition has failed for decades at stopping *unlicensed* recreational sales. Colorado Springs is now faced with the choice of whether they would like marijuana sold by licensed, regulated, and taxed businesses, or by violent criminal organizations and drug cartels.

As the Colorado Springs City Council has decided to ban licensed recreational sales, it should do everything in its power to protect public safety and enforce the law. This ordinance is a useful first step.

Sincerely,

Michael Elliott, Esq.

Executive Director

Marijuana Industry Group

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