



**Akamai Cannabis Clinic**  
3615 Harding Ave, Suite 304  
Honolulu, HI 96816

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Randy Gonce  
Executive Director, HICIA  
220 S. King Street, Suite 1600  
Honolulu, HI 96813

## **2021 LEGISLATIVE PRIORITIES**

Dear Randy,

With the 2021 Legislative Session rapidly approaching, I wanted to reach out to Hawaii Cannabis Industry Association ([HICIA](#)) to inquire about its legislative agenda.

I know that HICIA does not typically reveal its legislative priorities, but because of the many issues facing our medical cannabis patients, I wanted to give HICIA the opportunity to become involved in a growing discussion at the state level about ending the conflict with the federal regulation of marijuana.

Since my involvement with the Hawaii Dispensary Task Force, I have been trying to get the State to do something about the federal conflict, which is causing significant discrimination against our patients, as well as causing dispensaries to be considered Continuing Criminal Enterprises by the IRS and creating an unsustainable tax burden because of not being able to deduct standard business expenses from federal tax returns.

I'm sure you are keenly aware of this situation given your involvement with promoting [tax fairness](#) in Hawaii.

I've struggled with trying to understand why Hawaii's dispensaries are not interested in taking steps to end this conflict when I've approached dispensary management teams about this problem over the past several years. The only explanation I have been able to come up with is that dispensaries want to stay below the radar because of their federally illegal activities and because of needing to stay in the good graces of the Department of Health (DOH). Dispensaries may also be enjoying certain competitive advantages by participating in an "industry" that no completely law-abiding organization would dare enter given the risks created by the current federal conflict.

HICIA  
December 28, 2020  
Page 2

My guess is that HICIA is already working behind the scenes to promote a recreational legalization bill for the upcoming Session, since this would make the most sense from a business perspective.

I'm also guessing that HICIA still has no interest in taking steps at the state level to resolve the federal conflict or in bringing this issue up during its meetings with DOH, despite the impact that this conflict will have upon a broader state authorization that could include recreational use.

I am not in favor of waiting for Congress to fix a situation that our state created in the first place when it authorized the use of cannabis for medical purposes in Hawaii over twenty years ago, especially when such a "fix" at the federal level will likely impose a 5% federal tax on all cannabis products across the nation and will primarily benefit pharmaceutical companies that want to capitalize on FDA-approved cannabis drug products at the expense of state authorized use once marijuana is federally rescheduled.

I'm sure that you must be very busy getting ready for the Legislature's opening day, but I am happy to discuss these issues further if there is interest within HICIA.

Happy Safe Holidays !

Aloha,



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