



Oregon Retailers of Cannabis Association

www.oregoncannabisretailers.com

541-632-4442

Dear Chair, Commissioners, and Executive Director of the Oregon Liquor Control Commission:

Thank you again for your tireless work on behalf of Oregonians. As a result of your efforts, marijuana businesses in Oregon have been able to remain open and operating throughout the COVID19 crisis, and public, safe access to marijuana for adults, caregivers, and patients has been maintained. We continue to be impressed not only with the Commission's professional response, but also with your receptivity and openness to stakeholder concerns. You should be proud of the staff and operations of the agency.

As you are probably aware, retail licensees have seen an unprecedented increase in the volume of their delivery sales relative to in-person sales. Deliveries appear to create less opportunity for social contact, and thus increase the efficacy of Governor Brown's social distancing order. Moreover, if the frequency of delivery orders could be decreased, that would in turn reduce the amount of contact between delivery personnel and customers, and thus improve public health and safety outcomes.

We believe there is a safe and effective way to decrease the number of deliveries while still maintaining safe access, and which also complies with all applicable statutory provisions. In a nutshell, we believe the Commission should consider increasing the quantities of cannabis and cannabis products available for purchase via home delivery.

This would be permitted under Oregon law; for example, while ORS 475B.337 only allows possession of one ounce of usable marijuana in a public place, it also allows possession of less than eight ounces of usable marijuana in a non-public place, such as one's home. The latter limit would apply to home deliveries, and thus home delivery of, for example, two ounces of usable marijuana by a retail licensee, would be lawful, if the current rules were changed to accommodate it.

Because temporary rule changes to allow larger delivery quantities would be both lawful and would promote the goals of Governor Brown's social distancing order, we humbly suggest that the Commission consider evaluating and adopting such temporary rule changes. Again, thank you for your service in this difficult time, and for your consideration of the foregoing.

Respectfully,

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