

February 6, 2019 Rm. 229, 9:00 a.m.

To: The Honorable Brian T. Taniguchi, Chair

Member of the Senate Committee on Labor, Culture and the Arts

The Honorable Rosalyn H. Baker, Chair

Members of the Senate Committee on Commerce, Consumer Protection, and Health

From: Linda Hamilton Krieger, Chair

and Commissioners of the Hawai'i Civil Rights Commission

Re: S.B. No. 1524

The Hawai'i Civil Rights Commission (HCRC) has enforcement jurisdiction over Hawai'i's laws prohibiting discrimination in employment, housing, public accommodations, and access to state and state funded services (on the basis of disability). The HCRC carries out the Hawai'i constitutional mandate that no person shall be discriminated against in the exercise of their civil rights. Art. I, Sec. 5.

S.B. No. 1524 prohibits: 1) discrimination based on status as registered qualifying medical cannabis patient; and, 2) adverse employment action based solely on such status or on a positive drug test for cannabis or its components. This employment protection is critical for registered qualifying medical cannabis patients, because there is no correlation between a positive test and current impairment.

The HCRC supports the intent of S.B. No. 1524, and offers these comments:

The new statutory protection is placed in a new section in part III of HRS chapter 378, not under the jurisdiction of the HCRC, which limited to chapter 378, part I. The HCRC appreciates that this placement is consistent with statutory recognition that the HCRC does not enforce the rights of registered medical cannabis users generally. The HCRC's interest is focused on the rights of persons with a disability. The H.R.S. § 329-122 definition of "debilitating medical condition" is not identical to the H.R.S. § 378-1 and H.A.R. § 12-46-182 definition of

"disability," so not every registered qualifying medical cannabis patient will necessarily be a person with a disability entitled to a reasonable accommodation.

On pages 3-4 of the bill, the new § 378-__(b)(2)(B) provides that the new statutory protection shall not prohibit an employer from disciplining an employee who is a qualifying patient for failing a drug test, if the employee performs work at heights or in confined spaces. In contrast, the new § 378-__(b)(2)(C) provides that the new statutory protection shall not prohibit an employer from disciplining an employee who is a qualifying patient for failing a drug test, if such employee works with dangerous chemicals or high voltage electricity lines **while impaired**. It is not clear why these exceptions are different, the first allowing discipline for a failed drug test (without regard to impairment), and the second for a failed drug test, but only for working "while impaired" with chemicals or high voltage electricity lines.

On page 4 of the bill, the new § 378-_(c)(2) seems to provide protection against tort claims for injuries suffered by third parties, if the employer had no knowledge or reason to know that an employee was impaired. It seems like an overly broad shield against liability for injuries suffered by innocent third parties. For example, if a window washer who may have been impaired drops a bucket or cleaning tool from on high, and a passerby on the sidewalk below is injured or killed, should the window washing company be shielded from liability if they did not have knowledge that an employee was impaired?

The HCRC supports the intent of S.B. No. 1524, with these comments.



STATE OF HAWAII DEPARTMENT OF PUBLIC SAFETY

919 Ala Moana Boulevard, 4th Floor Honolulu, Hawaii 96814 NOLAN P. ESPINDA DIRECTOR

Cathy Ross
Deputy Director
Administration

Jodie F. Maesaka-Hirata Deputy Director Corrections

Renee R. Sonobe Hong
Deputy Director
Law Enforcement

TESTIMONY ON SENATE BILL 1524 RELATING TO THE MEDICAL USE OF CANNABIS.

by Nolan P. Espinda, Director Department of Public Safety

Senate Committee on Commerce, Consumer Protection, and Health Senator Rosalyn H. Baker, Chair Senator Stanley Chang, Vice Chair

> Senate Committee on Labor, Culture and the Arts Senator Brian T. Taniguchi, Chair Senator Les Ihara, Jr., Vice Chair

Wednesday, February 6, 2019; 9:00 a.m. State Capitol, Conference Room 229

Chair Baker, Chair Taniguchi, Vice Chair Chang, Vice Chair Ihara, and Members of the Committee:

The Department of Public Safety (PSD) offers comments to Senate Bill (SB) 1524. PSD believes that the language in this measure would conflict with federal requirements for the shipping, transporting, receiving, or possessing firearms or ammunition as referenced by the U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives' Open Letter, dated September 21, 2011 (attached) and prohibitions in negotiated Collective Bargaining Agreements.

The Department respectfully requests that language be added to exempt the measure from applying to law enforcement officers throughout the State and to employees who work in any State correctional facility. The recommended language to add to Section 378(a) on Page 3, line 3 is as follows:

Testimony on SB 1524
Senate Committee on Commerce, Consumer
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"unless the employee is a law enforcement officer throughout the State or the employee works in any State correctional facility including where a failure to do so would cause an employer to violate federal laws, regulations, lose a monetary or licensing related benefit under federal laws or regulations."

The addition of this language will ensure compliance with the presumption that possession of a card authorizing the possession and use of marijuana under State law, forms a "reasonable cause to believe" that the person is prohibited from firearms possession. This language will also assist correctional facilities in limiting the introduction of contraband.

Thank you for the opportunity to present this testimony.



HAWAII GOVERNMENT EMPLOYEES ASSOCIATION

AFSCME Local 152, AFL-CIO

RANDY PERREIRA, Executive Director • Tel: 808.543.0011 • Fax: 808.528.0922

The Thirtieth Legislature, State of Hawaii
The Senate
Committee on Commerce, Consumer Protection, and Health
Committee on Labor, Culture and the Arts

Testimony by Hawaii Government Employees Association

February 6, 2019

S.B. 1524 – RELATING TO THE MEDICAL USE OF CANNABIS

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO conceptually supports the purpose and intent of S.B. 1524 which prohibits an employer from discriminating against an employee based on the employee's status as a patient qualified to use medical cannabis. This measure also prohibits an employer from taking adverse action against an employee if the employee tests positive for cannabis.

Although the Medical Cannabis Registry Program was passed by the Legislature in 2000 and the creation of the Medical Cannabis Dispensary Program followed 15 years later, to be implemented in 2015, there continues to be unforeseen ramifications of the impact of medical cannabis on existing laws and policies. This measure appropriately addresses the existing gap in protections for qualified employees. As an Exclusive Representative to employees within every jurisdiction in the state, we are aware of medical cannabis qualified employees who do not use their medication for fear of testing positive and being disciplined as a result. We are in the process of addressing these issues via memorandum of agreement with the Employer; however, all qualified employees, whether they are protected by collective bargaining agreements or not, are in a compromising position and the passage of this measure will provide a remedy.

Thank you for the opportunity to testify in support of S.B. 1524.

Respectfully submitted,

Randy Perreira
Executive Director



Dedicated to safe, responsible, humane and effective drug policies since 1993

TO: Senate Committees on Commerce, Consumer Protection & Health; Labor, Culture

& the Arts

FROM: Carl Bergquist, Executive Director HEARING DATE: February 6, 2019, 9AM

RE: SB1524, Relating to the Medicinal Use of Cannabis, SUPPORT

Dear Chairs Baker & Taniguchi, Vice Chairs Chang & Wakai, Committee Members:

The Drug Policy Forum of Hawai'i (DPFH) **strongly supports** this measure to prohibit employers from summarily dismissing employees, who are registered medical cannabis patients, solely for the status of being such a patient or for testing positive on a drug test. This would foster public health and help decrease stigma around a medicine that became legal in Hawai'i nearly 20 years ago, and which is now more widely available via a regulated dispensary system. This bill, together with SB1523 (to make medical cannabis reimbursable through the workers' compensation system), will work to promote a safer and more just work environment.

Presently, workers who are registered to use medical cannabis can find themselves having to choose between the job they need to support their family and continuing to take the medicine that relieves their suffering. At least 11 other states (AR, AZ, CT, IL, ME, MN, NV, NY, PA, RI) have laws with explicit protections against discrimination while courts in others have stepped in to add them (MA). New Mexico is currently contemplating legislation similar to this bill.¹

P.O. Box 83, Honolulu, HI 96810-0083 Phone: 808-518-3213 Email: reform@dpfhi.org Website: www.dpfhi.org

¹ https://www.lcsun-news.com/story/news/local/new-mexico/2019/01/08/new-mexico-medical-cannabis-work-place-bill-protect-legal-users/2501701002/.

Simultaneously, federal courts are also looking at workplace protections for medical

cannabis patients. The cases can be divided bewteen those where the court is

assessing protections in states where a) explicit protections exist versus b) states where

they do not. So far, the courts have ruled in favor of the employee when a state law

protects him or her from discrimination, and for the employer when no such protections

exist in state law.² Of note here is that the Federal Drug Free Workplace Act (DFWA)

has been at issue in two prominent cases. The courts have split on whether DFWA

requires that employers with federal contracts ensure that workers do not have

cannabis in their system, or whether compliance can be met if the employee does not

use or possess medical cannabis at work.

Regardless, there is no need to await court rulings elsewhere. By adopting this bill,

Hawai'i can join the list of states that proactively does what it can to protect the rights of

workers who use medical cannabis while ensuring that employers can protect their

legitimate interests. We humbly request that you passed it out of your committees.

Mahalo for the opportunity to testify.

2

Email: reform@dpfhi.org

<u>SB-1524</u> Submitted on: 2/4/2019 3:49:18 PM

Testimony for LCA on 2/6/2019 9:00:00 AM



Submitted By	Organization	Testifier Position	Present at Hearing
Kat Brady	Testifying for Community Alliance on Prisons	Support	Yes

Comments:

Aloha Senators Thielen and Baker, Vice Chairs Chang and Ihara and Members of the Committees!

Community Alliance on Prisons SUPPORTS this measure. Many working people take a variety of medications for their conditions and are able to be productive members of the workforce,

How someone is performing on the job, should be the primary concern of the employer.

Mahalo for this opportunity to testify in support of this bill.

<u>SB-1524</u> Submitted on: 2/5/2019 8:40:11 AM

Testimony for LCA on 2/6/2019 9:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Melodie Aduja	Testifying for O`ahu County Committee on Legislative Priorities of the Democratic Party of Hawai`i	Support	No

Comments:

<u>SB-1524</u> Submitted on: 2/1/2019 4:58:41 PM

Testimony for LCA on 2/6/2019 9:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
lynne matusow	Individual	Support	No

Comments:

All too often employers are refuisng to hire poeple taking medical cannabis, yet they do not discriminate against other medications. This is wrong. I strongly support this bill. It is long overdue.

I wish to point out that I am an interested person and do not take medical cannabis.

lynne matusow

<u>SB-1524</u> Submitted on: 2/1/2019 4:24:32 PM

Testimony for LCA on 2/6/2019 9:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Victor K. Ramos	Individual	Oppose	No

Comments:

<u>SB-1524</u> Submitted on: 2/4/2019 11:42:19 AM

Testimony for LCA on 2/6/2019 9:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Destiny Brown	Individual	Support	No

Comments:

Aloha Committe Chair and Members,

I am writing in support of SB1524.

Thank you,

Destiny Brown

Constituent Senate District 25

Constituent House Distrct 13

Student Hawaii Pacific University

JOSH GREEN LIEUTENANT GOVERNOR



LEONARD HOSHIJO DEPUTY DIRECTOR

STATE OF HAWAII DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS

830 PUNCHBOWL STREET, ROOM 321 HONOLULU, HAWAII 96813

www.labor.hawaii.gov Phone: (808) 586-8844 / Fax: (808) 586-9099 Email: dlir.director@hawaii.gov

February 6, 2019



To: The Honorable Brian T. Taniguchi, Chair, The Honorable Les Ihara Jr., Vice Chair, and

Members of the Senate Committee on Labor, Culture and the Arts

The Honorable Rosalyn H. Baker, Chair,

The Honorable Stanley Chang, Vice Chair, and

Members of the Senate Committee on Commerce, Consumer Protection

and Health

Date: Wednesday, February 6, 2019

Time: 9:00 a.m.

Place: Conference Room 229, State Capitol

From: Scott T. Murakami, Director

Department of Labor and Industrial Relations (DLIR)

Re: S.B. No. 1524 RELATING TO THE MEDICAL USE OF CANNABIS

I. OVERVIEW OF PROPOSED LEGISLATION

SB1524 amends the Employment Practices Law, Part III. Unlawful Suspension or Discharge, Chapter 378 Hawaii Revised Statutes (HRS) by adding a new section to:

- prevent any employer from discriminating against an employee based on the status of an employee allowed to use medical cannabis as a qualifying patient,
- prohibits an employer from acting against an employee based solely on the employee's status as a qualifying patient or if the results of the employee's drug test are positive for cannabis, and
- specifies permissible and impermissible actions by employers and employees.

DLIR offers comments on this bill.

II. CURRENT LAW

§378-32, HRS, "Unlawful suspension, barring, discharge, withholding pay, demoting, or discrimination." prohibits an employer from suspending, discharging, or discriminating against an employee:

- "solely because" the employer has been summoned as a garnishee in a cause where the employee is the debtor;
- "solely because" the employee has suffered a work injury;
- "because" the employee testified or was subpoenaed to testify in a proceeding under this law; or
- "because" the employee tested positive for drugs or alcohol in a substance abuse on-site screening test.

DLIR notes that "solely because" is a higher standard of proof while "because" is a lower one. Further, the definition of "employer" in Chapter 378, Part III does not include the Federal government, State, or counties.

The Hearings Branch of the Wage Standards Division enforces these laws for the protection of employees of all private employers in the State.

III. COMMENTS ON THE SENATE BILL

DLIR appreciates the intent of this measure to provide limited employment protections for those that are qualifying medical cannabis patients pursuant to Hawaii law. The measure, as drafted, contains ambiguous and conflicting language that would create additional burdens upon the Department.

The Department concurs with the Hawaii Civil Rights Commission's appreciation that the measure recognizes that the Commission does not enforce the rights of registered medical cannabis users generally and is focused on the rights of persons with disabilities.

In addition, the Department notes the following:

- Page 3, lines 18-19, the language suggests that employees can work while impaired unless the employee "operates or is in physical control" of chemicals that require government issued permits or high voltage electrical lines.
- Page 4, lines 13-16, the language appears to allow employees to work while impaired if the employees are working off the employer's premises during the hours of employment.
- There appears to be a conflict between subsection (a) (page 2, lines 14-21 through page 3, lines 1-5), and subsection (b), paragraphs (1) and (3) (page

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- 3, lines 6-10, pages 4, lines 4-9).
- Page 5, lines 12 through 16, an employee may be deemed to be impaired regardless of whether the employee used cannabis.
- Definition of "impaired" is vague.

If the measure is passed under Chapter 378, HRS, Part III, and becomes the jurisdiction of the DLIR, the Wage Standards Division will require additional resources.



ON THE FOLLOWING MEASURE:

S.B. NO. 1524, RELATING TO THE MEDICAL USE OF CANNABIS.

BEFORE THE:

SENATE COMMITTEES ON LABOR, CULTURE AND THE ARTS AND ON COMMERCE, CONSUMER PROTECTION, AND HEALTH

DATE: Wednesday, February 6, 2019 **TIME:** 9:00 a.m.

LOCATION: State Capitol, Room 229

TESTIFIER(S): Clare E. Connors, Attorney General, or

Adam S. Rosenberg, Deputy Attorney General



Chairs Taniguchi and Baker, and Members of the Committees:

The Department of the Attorney General provides the following comments.

The purpose of this bill is to prohibit an employer from discriminating against an employee based on the employee's status as a qualifying patient who uses medical cannabis. This bill prohibits taking action against an employee based solely on the employee's qualifying patient status, or if the employee's drug test results are positive for cannabis. It also specifies what actions are permissible and impermissible for employers and employees. The bill accomplishes these purposes by adding a new section to chapter 378, Hawaii Revised Statutes (HRS).

Cannabis is a Schedule I controlled substance that is illegal to produce, possess, sell, or use according to the federal government and the Controlled Substances Act (CSA), 21 U.S.C. §§ 801-904. The Food and Drug Administration (FDA) has not approved cannabis as a safe or effective drug for any purpose. Thus, any laws the State enacts purporting to legalize any activities pertaining to cannabis may conflict with federal law, and federal authorities could take enforcement actions. The validity of such laws could also be subject to civil challenges.

It is possible that a court could find a conflict between this bill and the CSA.

In <u>Garcia v. Tractor Supply Co.</u>, 154 F. Supp. 3d 1225 (D.N.M. 2016), the federal court found that New Mexico's unlawful discrimination laws (the New Mexico Human

Testimony of the Department of the Attorney General Thirtieth Legislature, 2019
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Rights Act), and New Mexico's state cannabis laws (the Compassionate Use Act) conflicted with the CSA.

However, in Noffsinger v. SSC Niantic Operating Co. LLC, 273 F. Supp. 3d 326 (D. Conn. 2017), the federal court found that Connecticut's medicinal cannabis discrimination state law, included in its Palliative Use of Marijuana Act, did not conflict with the CSA.

Some additional concerns are that:

- (1) on page 3, lines 18-19, the wording suggests that employees are allowed to work while impaired except when working with regulated chemicals or high voltage electricity lines;
- (2) on page 3, lines 18-21, through page 4, lines 1-3, it appears that there are other high risk jobs for which safety is a concern, in addition to the exceptions listed;
- (3) on page 4, lines 13-16, the wording appears to allow employees to work while impaired if the employees are working off of the employer's premises;
- (4) there appears to be a conflict between subsection (a) (page 2, lines 14-21, through page 3, lines 1-5), and subsection (b), paragraphs (1) and (3) (page 3, lines 6-10, page 4, lines 4-9);
 - (a) in paragraph (b)(1), it is unclear how an employer can enforce a workforce drug policy in a nondiscriminatory manner;
 - (b) in paragraph (b)(3), it appears an employee can be disciplined for being impaired outside of work:
- (5) on page 5, lines 12 through 14, an employee may be deemed to be impaired regardless of whether the employee used cannabis;
- (6) the definition of impaired is vague;
- (7) placing medicinal cannabis employment discrimination in chapter 378 is inconsistent with other forms of discrimination, including housing, education, medical care (including organ transplant receipt), and child custody decisions, which are in section 329-125.5, HRS.

Thank you for the opportunity to provide testimony.

DEPARTMENT OF HUMAN RESOURCES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET 10TH FLOOR • HONOLULU, HAWAII 96813 TELEPHONE: (808) 768-8500 • FAX: (808) 768-5563 • INTERNET: www.honolulu.gov/hr

KIRK CALDWELL MAYOR



CAROLEE C. KUBO DIRECTOR

NOEL T. ONO ASSISTANT DIRECTOR

February 6, 2019

The Honorable Brian T. Taniguchi, Chair
The Honorable Les Ihara, Jr., Vice Chair
and Members of the Committee
on Labor, Culture and the Arts
The Honorable Rosalyn H. Baker, Chair
The Honorable Stanley Chang, Vice Chair
and Members of the Committee
on Commerce, Consumer Protection, and Health
The Senate



The Senate State Capitol, Room 229 415 South Beretania Street Honolulu, Hawaii 96813

Dear Chairs Taniguchi and Baker, Vice Chairs Ihara and Chang, and Members of the Committees:

SUBJECT: Senate Bill No. 1524

Relating to the Medical Use of Cannabis

Senate Bill No. 1524 would prohibit employers from disciplining, suspending, discharging, or discriminating against employees based on a positive marijuana test result if the employee used medical marijuana in accordance with the law. The Department of Human Resources, City and County of Honolulu ("the City") respectfully opposes the bill in its current form.

While the intent of the measure seems reasonable at first glance, the proposed law could better recognize the realities of the workplace and the role drug-testing plays in enhancing workplace safety. To foster a safe work environment, employers must have a reliable and practical method for identifying employees whose work may be affected by the mind-altering effects of cannabis. This is particularly critical for those employees whose duties include safety-sensitive or first responder functions, where the effects may not be apparent until an employee is in a life or death, crisis situation.

The City would propose that the following specific exceptions be added to Subsection (b), paragraph (2) of the new section of Chapter 378 as found in Section 2 of the measure.

The Honorable Rosalyn H. Baker, Chair
The Honorable Stanley Chang, Vice Chair
and Members of the Committee on Commerce, Consumer Protection, and Health
The Honorable Brian T. Taniguchi, Chair
The Honorable Les Ihara, Jr., Vice Chair
and Members of the Committee on Labor, Culture and the Arts
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This section shall not prohibit an employer from:

(2) Disciplining an employee who is a qualifying patient for failing a drug test if:

(C) The employee is a law enforcement officer employed by the State or counties;

- (D) The employee is a firefighter employed by the State or counties;
- (E) The employee is a water safety officer, lifeguard, swimming instructor or other employee of the State or counties who is responsible for the safety of the public at swimming pools or on beaches;
- (F) The employee is authorized to carry or use, or both, firearms on the job;
- (G) The employee is an emergency medical services employee of the State or county;
- (H) The employee administers or may administer controlled substances or other drugs to patients whether in hospitals, nursing homes, or in emergency situations such as would be encountered by emergency medical services personnel;
- (I) The employee operates or is in physical control of any of the following:
 - (iii) Any combination of vehicles which has a gross combination weight rating or gross combination weight of 11,794 kilograms or more (26,001 pounds or more) whichever is greater, inclusive of a towed unit(s) with a gross vehicle weight rating or gross vehicle weight of more than 4,536 kilograms (10,000 pounds) whichever is greater (i.e., requires a Class A commercial drivers' license as defined by the Federal Department of Transportation);
 - (iv) Any single vehicle which has a gross vehicle weight rating or gross vehicle weight of 11,794 or more kilograms (26,001 pounds or more), or any such vehicle towing a vehicle with a gross vehicle weight rating or gross vehicle weight that does not exceed 4,536 kilograms (10,000 pounds) (i.e., requires a Class B commercial drivers' license as defined by the Federal Department of Transportation); or

The Honorable Rosalyn H. Baker, Chair
The Honorable Stanley Chang, Vice Chair
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- (v) Any single vehicle, or combination of vehicles, that does not meet the definition of Class A or Class B, but is either designed to transport 16 or more passengers, including the driver, or is transporting material that has been designated as hazardous under 49 U.S.C. 5103 and is required to be placarded under subpart F of 49 CFR Part 172 or is transporting any quantity of a material listed as a select agent or toxin in 42 CFR Part 73 (i.e., requires a Class C commercial drivers' license as defined by the Federal Department of Transportation);
- (vi) Machinery or power equipment; or
- (vii) A motor vehicle.

The City also has concerns about the phrase "while working on the employer's premises during the hours of employment," as it does not clearly cover on-duty work outside of the employer's premises. For example, employees who are drivers will often be on-duty while not on their employer's premises. Instead, the City suggests the phrase "while on-duty or in the workplace."

The City is further concerned that this measure forces an "Impaired" standard upon otherwise legitimate employment action. Unfortunately, current urinalysis testing methods do not allow for a determination of whether employees are "under the influence," only whether cannabinoid metabolites are present in an individual's urine. To the City's knowledge, there is currently no objective and approved laboratory test available which could reliably determine whether an employee is "under the influence" of marijuana. Public safety could be endangered if only employees who are proven to be "impaired" may be subject to personnel action. Even if supervisors receive training on the signs and symptoms of an employee being "impaired," factors such as delayed reaction time and ability to make sound decisions in a crisis will not necessarily present themselves in an observable manner prior to the crisis—at which time it would be too late. This is why random testing and actions taken for positive test results remain valuable tools in enhancing the safety of the workplace.

Thank you for the opportunity provide comments on this measure.

Sincerely,
Carolic C. Frb

Carolee C. Kubo

Director





I SUPPORT SB1523, because cannabis should be legal.



Opioids kill 55,000 Americans/year.

Alcohol kills 88,000 Americans/year.



Cannabis kills 0 Americans/year.

~ In fact, cannabis effectively treats deadly nicotine, alcohol, and opioid addictions.

LEGALIZE CANNABIS & SAVE LIVES!

Mary Overbay. Puunene, Hawaii

I SUPPORT SB1524, because cannabis should be legal.

The cannabis prohibition has 0 justification.

LATE

Cigarettes kill 480,000 Americans/year.



Opioids kill 55,000 Americans/year.





~ In fact, cannabis effectively treats deadly nicotine, alcohol, and opioid addictions.

LEGALIZE CANNABIS & SAVE LIVES!

Brian Murphy Maui, Hawaii



<u>SB-1524</u> Submitted on: 2/6/2019 3:40:56 PM

Testimony for LCA on 2/6/2019 9:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Lynn Onderko	Individual	Support	No

Comments: