

DEPARTMENT OF HEALTH
OFFICE OF MEDICAL MARIJUANA USE

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ADMINISTRATIVE RULE WORKSHOP

DATE TAKEN: June 3, 2026
TIME: 9:00 AM - 9:20 AM
LOCATION: Betty Easley Conference Center
4075 Esplanade Way #182
Tallahassee, Florida 32399

1 APPEARANCES:

2 OMMU PANELISTS:

3 MEREDITH HAYES

4 DOUGLAS DOLAN

5 DEHAY FORNEY

6 JOSHUA STURMS

7 CAEY HURLEY

8 MEGAN WILLIAMS

9 MELISSA PASSET

10 BENJAMIN LABELLE, DEPARTMENT OF HEALTH:

11 JAMES LOVE, DOH

12 BRIAN GALLIAN, DOH

13 JOHN WATERS DOH OFFICE OF LEGISLATIVE PLANNING

14

15 LIST OF ATTENDEES:

16 DEVIN BAXTER BAXTER LAW

17 JOHN LOCKWOOD, LOCKWOOD LAW

18 CRAIG SIMPSON LOCKWOOD

19 NICK GARULAY, THE DOC APP

20 GENE MCGEE GTI GREEN THUMB INDUSTRY

21 JESSICA ENGLE GOLDFLOWER

22 LILY BELL TSE CONSULTING

23 CRAIG VARN

24 BOBBIE SMITH

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P R O C E E D I N G S

(Thereupon, Ms. Hayes, Policy Manager and Mr. Dolan, Chief Legal Counsel, Benjamin LaBelle, Field Operations Manager, and Melissa Passet, Variance Manager were seated at the dais. The following hearing was held at 9:00 AM.)

CHAIRWOMAN MS. HAYES: Good morning. This is a hearing on rule 64-4.205, Standards for Production of Edibles; 64-4.215, Renewal Application Requirements for MMTCs; 64-4.217, MMTC Financial Assurance; 64-4.218, MMTC Trade Name and Logo; 64-4.219 MMTC Packaging and Labeling; 64-4.221, MMTC Seed-to-Sale Tracking System Integration; 64-4.222, MMTC STS Tracking System Procedures; and 64-4.224, Dosing and Supply Limits for Medical Marijuana.

This hearing is being conducted on June 3, 2026, at Betty Easley Conference Center, 4075 Esplanade Way, Room 182, Tallahassee, Florida, 32399.

I am conducting the hearing for the Department.

I am Meridith Hayes, and I am the Policy Manager for the Office of Medical Marijuana. Our address is Florida Department of Health, 4052 Bald

1 Cypress Way, Bin M-01, Tallahassee, Florida, 32399.

2 I am joined by Doug Dolan, Chief Legal Counsel.

3 As we move through each rule we will introduce
4 program staff who specialize in each rule's subject
5 matter to the panel. These panel members may
6 rotate throughout the hearing based on the rule
7 being discussed.

8 This hearing is being conducted in accordance
9 with Section 120.54, Florida Statutes. The notice
10 for this hearing was published in volume 52, number
11 90 and 93 of the Florida Administrative Register on
12 May 8th and May 13th, 2026.

13 The purpose of this hearing is to allow the
14 public an opportunity to participate in the rule
15 making process.

16 Before we begin we ask that all comments that
17 include suggested rule language be submitted in
18 writing to the OMMU rules inbox at
19 OMMURules@FLHealth.gov before the end of the
20 comment period which will be announced at the end
21 of the hearing.

22 Please be advised that this hearing is being
23 transcribed by a court reporter.

24 This rule-making initiates non-emergency rule
25 making to replace emergency rules 64ER.25-1,

1 64ER.22-1, 64ER.24-1, 64ER.24-2, 64ER.22-8,
2 64ER.20-32, 64ER.2035 and 64ER.22-2, adopted by the
3 Department to implement Section 381.986, Florida
4 Statutes.

5 These rules set forth requirements for MMTC's
6 licensure renewal, financial assurance, the MMTC
7 seed-to-sale tracking system, dosing limits,
8 standards for production of edibles, trade name and
9 logo, and packaging and labeling.

10 If you've indicated on the sign-in sheet that
11 you wish to comment on the rule, you will be called
12 in the order in which you've signed in to speak on
13 the subject rule indicated.

14 When your name or affiliation is called,
15 please approach the podium at the front of the
16 room. We ask that you state your name and your
17 organization that you represent.

18 In the interest of time, we ask that you do
19 not repeat the position of the previous speakers.
20 You may, however, for the record, state that you
21 agree with one or more of the previous speakers.

22 We ask that you limit your comments to no more
23 than about three or so minutes.

24 At this time, we would like to open the floor
25 for comment on Rule 64-4.205, Standards for

1 Production of Edibles, and we will only be
2 accepting comments on this rule at this time.

3 On the panel now is Benjamin LaBelle, Field
4 Operations Manager; and Melissa Passet, Variance
5 Manager.

6 Giuliano from INSA.

7 MR. GIULIANO: I'm just -- I've got no
8 comment.

9 CHAIRWOMAN MS. HAYES: No comment.

10 Okay. Was there anyone else that wished to
11 speak on Rule 64-4.205, Standards for Production of
12 Edibles?

13 (No Response.)

14 With there being no additional comments, next,
15 we'd like to open the floor for Rule 64-4.215,
16 Renewal Application Requirements for MMTCs.

17 And we will only be accepting comments on this
18 rule at this time.

19 Joining the panel now is Deshay Forney,
20 Operations and Management Consultant.

21 (Thereupon, Benjamin LaBelle, Field Operations
22 Manager; and Melissa Passet, Variance Manager exited the
23 dais and Ms. Forney, Operations and Management
24 Consultant was seated at the dais.)

25 Craig Simpson.

1 MR. SIMPSON: Good morning. Craig Simpson
2 with the Lockwood Law Firm.

3 For the record, we represent several MMTCs
4 across the State of Florida. The new renewal
5 timeline rule changes the renewal period to no
6 longer be tied to when the renewal of the previous
7 application was approved.

8 The current rule provides that after the
9 initial period, the next two years period is
10 measured from the effective date of renewal.
11 However, the proposed rule says that the renewal
12 period begins immediately after a prior license
13 expires, regardless of when the renewal is
14 approved.

15 This can present an obstacle for some MMTCs
16 whose expiration date occurs early in the year, as
17 they're trying to get their auditors and
18 accountants to put together their certified
19 financials.

20 The first couple of months of the year are
21 especially busy and difficult, as is the midst of
22 the tax season. This would probably incur a series
23 of variances and extension requests that would
24 basically exist forever as these MMTCs whose
25 renewal date will continually be in the first

1 couple of months of the year will never be able to
2 get their certified financials in by that date.

3 We would suggest potentially allowing MMTCs a
4 one-time option to permanently change the date of
5 their renewal, potentially allowing an extension
6 one time and then setting that as the date for
7 renewal going forward. That way, the auditors and
8 accountants will be able to handle their certified
9 financials later in the year, and then they will be
10 able to meet that deadline going forward without
11 having to continually request new variances.

12 Another issue we have is with the renewal-fee-
13 release schedule. In the past, new renewal fee
14 schedules have been released right before certain
15 MMTCs renewal deadline, sometimes while these MMTCs
16 have already begun submitting their documents.

17 This last-minute notice of fee changes, some
18 of which have represented a significant fee
19 increase, makes it difficult for MMTCs to plan
20 expenses effectively. Having more advance notice
21 on that would allow them to plan their financials
22 out, and also hopefully, avoid having to request
23 extensions of payment.

24 The final issue is one we have raised several
25 times with the hand delivery of renewal. The new

1 language still requires that the renewal documents,
2 including any RAIs, which can be very brief, must
3 be hand-delivered to the Agency. We believe this
4 is unnecessary, given that all other documents can
5 be submitted through electronic filing.

6 Additionally, continuing to require the
7 renewal fee to be hand delivered, which often takes
8 the form of a cashier's check, is far more a --
9 presents a greater security risk than being able to
10 wire the money electronically.

11 Thank you very much.

12 CHAIRWOMAN MS. HAYES: Thank you.

13 Are there any additional comments?

14 (No response.)

15 Okay. Next, we would like to open the floor
16 for comment on Rule 64-4.217, MMTTC Financial
17 Assurance.

18 And we will only be accepting comments on this
19 rule at this time.

20 There was no one that signed up to comment on
21 this rule.

22 Was there anyone who would like to offer
23 comment at this time?

24 Okay. Next, we would like to open the floor
25 for comment on Rule 64-4.218, MMTTC Trade Name and

1 Logo. And we will only be accepting comments on
2 this rule at this time.

3 John Lockwood.

4 MR. LOCKWOOD: Good morning. John Lockwood
5 with the Lockwood Law Firm.

6 All right. So, I have a couple of questions
7 on 64-4.218. In paragraph one, it defines the term
8 "recreational use" as including the term
9 "enjoyment." Does paragraph one change the
10 Agency's existing application and interpretation of
11 the term "recreational use" from how it's been
12 implied previously to today.

13 CHIEF LEGAL COUNSEL MR. DOLAN: Mr. Lockwood,
14 you're asking for a legal interpretation or --

15 MR. LOCKWOOD: I'm asking a question. I mean,
16 in 154 (3)(c)(1), the Agency has to have someone
17 here. So, my question is, is the inclusion of this
18 word enjoyment -- my question is, does this modify
19 the Agency's application of the term "recreational
20 use."

21 For example, would this amendment to the term
22 "recreational use", could this possibly be used by
23 the Agency to force MMTCs that have previously
24 approved trade names to possibly modify their trade
25 names?

1 Is this different, I guess, from how the
2 Agency's historically applied the term recreational
3 use? And if so, how?

4 CHIEF LEGAL COUNSEL MR. DOLAN: Deshay, would
5 you like to make an answer or do I need to?

6 MS. FORNEY: You can answer.

7 CHIEF LEGAL COUNSEL MR. DOLAN: If it's okay,
8 I won't get into research how we interpret it in
9 the past and get back to you. I'm happy to.

10 MR. LOCKWOOD: Yeah. That's fine. I mean,
11 I'm trying to just develop a record here. And I
12 think for our clients, the biggest thing is now
13 that we're going to have, potentially, a new
14 definition of recreational use.

15 We have a lot of people that have trade names
16 throughout the State of Florida. My biggest
17 concern is, is this something that could be used to
18 impact somebody's existing trade names? I have
19 plenty more questions here with that.

20 Another issue I have is what exactly is the
21 Agency's -- how does the Agency -- how is the
22 Agency going to define and apply the term
23 "enjoyment?" Because we talked about this briefly
24 in the delivery device rule last week, right, and
25 the Agency saying the term "enjoyment," now, you

1 know, connotes something that's akin to
2 recreational use.

3 But, you know, obviously if you watch
4 medicinal commercials and pharmaceutical
5 commercials, it's all showing people living their
6 lives. Cancer patients, people, you know, are
7 taking medical marijuana to alleviate their
8 symptoms and enjoy their life.

9 And so, I think a lot of people in the
10 industry are just having a hard time understanding
11 how the term "enjoyment" itself actually now
12 becomes a recreational term that is now prohibited
13 and not allowed under 381.986.

14 I'm assuming you'll have to get back to me on
15 this.

16 CHIEF LEGAL COUNSEL MR. DOLAN: Yeah. I would
17 like to give you a really -

18 MR. LOCKWOOD: Perfect.

19 CHIEF LEGAL COUNSEL MR. DOLAN: -- proper
20 answer.

21 MR. LOCKWOOD: In Paragraph (2)(e), we talk
22 about street or slang names and that we can't have
23 a trade name or logo. My question is, does the
24 Agency have a database or a list of these street or
25 slang names; and how will those street or slang

1 names be determined?

2 CHIEF LEGAL COUNSEL MR. DOLAN: Is it how is
3 the Agency going to make a determination of whether
4 this counts as --

5 MR. LOCKWOOD: Yeah. What makes the street or
6 slang name. Right. Like, I mean, obviously you
7 could have a small group of people that may refer
8 to their -- you know, again, if we're talking about
9 illicit drugs -- you may have a small group of
10 people that refer to their drugs in a certain
11 particular manner. You know, maybe they call them
12 Skittles or Pez or whatever. When does that become
13 a street or slang name term such that it would be a
14 prohibited term? And how is the Agency going to
15 apply that?

16 Okay. All right. Moving on to paragraph
17 three.

18 So, paragraph three says, "an MMTC cannot use
19 a trade name or logo that has not been approved."

20 In a lot of municipalities -- I guess my first
21 question is, if we have a client that has a logo
22 and the text of the logo is green and they open up
23 a -- they want to open up a dispensary in
24 municipality and they want to use that exact logo,
25 the same font and everything, but the text would be

1 black, is that now a different logo?

2 CHIEF LEGAL COUNSEL MR. DOLAN: Is your
3 question just referring to color?

4 MR. LOCKWOOD: Just the color. Does the color
5 itself, if we go from green to black, does that now
6 make that a different logo?

7 And to further extrapolate on that. My
8 biggest concern is, in a lot of municipalities
9 there are prohibitions on coloring and things of
10 signs.

11 And so, we have a lot of MMTCs, and we have
12 clients that have upwards of almost 200
13 dispensaries in the state, and they've had to make
14 adjustments to signage in local municipalities to
15 accommodate those municipalities in order to pass
16 local zoning code.

17 And so, we're going to be forced into a
18 position because this rule later on talks about if
19 we change our logo now, we're going to have 180
20 days to update all of our signage.

21 So, my concern is, is that we're going to end
22 up in a scenario where we may have -- are we going
23 to be forced to basically pick one logo that is
24 potentially, you know, somehow compliant with all
25 local jurisdictions and that's now going to be

1 forced to be our logo with the state.

2 Or is the state going to have some allowance
3 that if you change certain things on it, your
4 coloring, maybe the sign of the font, you know,
5 maybe we have a scenario where a local government,
6 you know, we have some MMTCs that may have like a
7 little seal and then a word, right.

8 And so, what if there's a local government
9 that says you can only have text on the sign, you
10 can't have the actual logo itself? Is that going
11 to be permissible? And how is that going to be
12 affected by this 180-day limit?

13 CHIEF LEGAL COUNSEL MR. DOLAN: I'm sorry, Mr.
14 Lockwood. I just want to --

15 MR. LOCKWOOD: Yeah.

16 CHIEF LEGAL COUNSEL MR. DOLAN: There's two
17 scenarios though. They do seem to contemplate
18 slightly different changes. One being changes only
19 the color of whatever the approved, sort of, logo
20 is, and one of them, it sounds like adding
21 different elements, like you said, a seal or
22 something like that.

23 MR. LOCKWOOD: Yes. So, for example, let's
24 say that my trade name is, we dealt with this
25 recently, Mint Cannabis is one of our clients,

1 right. So, they have a coin and then I don't know
2 if now it says Mint Cannabis or just Mint. So
3 that's our approved logo, right, it's the coin with
4 Mint.

5 So, what if we go into a local jurisdiction
6 and they say we don't allow anything but text on
7 our signs. You can't have the coin, right. How is
8 that going to impact the MMTC? Is the Department's
9 position now that we simply can't open up that
10 dispensary because of that local government
11 regulation?

12 My final question here is, the 180 days, has
13 the Department done any due diligence or what due
14 diligence did the Department do to come up with
15 that number?

16 CHIEF LEGAL COUNSEL MR. DOLAN: What is that
17 based on?

18 MR. LOCKWOOD: What exactly -- how did we come
19 up with 180-days? Have we done a determination?

20 I mean, a lot of these local governments,
21 especially in South Florida, going through the
22 local permitting process, is not an easy task. And
23 it takes a significant amount of time. And then
24 after that, you have to actually order signs.

25 And so, you know, my overarching concern with

1 this entire rule is I feel like we're trying to
2 take a square peg and fit it into a round hole or
3 vice versa. I just don't understand how we can
4 have a truly one-size-fits-all.

5 We have a lot of MMTCs here in the state that
6 have been operating for upwards of a decade now at
7 this point in time, and they all have slight
8 versions of their signs on these stores, and
9 they've all been changed in some way from, you
10 know, dealing with local government, dealing with
11 landlords, all of these things.

12 Obviously, from my perspective, if we have a
13 client that wants to change their name entirely, I
14 can see why OMMU would want the MMTC to go back and
15 update their name. But if everybody's using the
16 same name and a consumer can ascertain that we're
17 going to the same store, maybe it doesn't have the
18 same color logo, you know, maybe the font is
19 different from some particular way. I don't
20 understand why the OMMU would require that.

21 And this is going to be a substantial
22 financial cost to people, because it's not just,
23 you know, as it relates to signage. I mean, we've
24 got this in packaging and labeling and all these
25 other things.

1 And so, I just think 180 days is incredibly
2 insufficient for this. And I think requiring MMTCs
3 to change, even when they make just little nuance
4 changes to accommodate, you know, local government
5 or landlord or any other issues that they may have
6 on their facilities is very much arbitrary and
7 capricious. And I don't think it's following the
8 spirit of the law.

9 And these facilities already pay a sizable
10 amount of money in renewal fees to the Department
11 every single, or every other year. And we jump
12 through every hoop, but this is just, this is one
13 hoop too much, unfortunately. And I just don't see
14 how we can move forward with this.

15 And so, we'll provide written comments. I'll
16 await, you know, some responses, clarifications to
17 this. I know that we're under a tight timeline for
18 these rules as far as filing notice of change or
19 proposed rule challenge.

20 I've expressed that, you know, we would prefer
21 to not do this in a litigious manner, but, you
22 know, this rule is going to have a substantial
23 economic cost to the industry. And so, I think
24 it's fair to say that we need to see some changes
25 from this rule.

1 Okay. Thank you.

2 CHIEF LEGAL COUNSEL MR. DOLAN: Thank you,
3 sir.

4 CHAIRWOMAN MS. HAYES: Thank you.
5 Giuliano?

6 Okay. Were there any additional comments?
7 (No response.)

8 Next, we would like to open the floor for
9 comment on Rule 64-4.219, MMTC Packaging and
10 Labeling.

11 And we will only be accepting comments on this
12 rule at this time.

13 Joining the panel now is Melissa Passet,
14 Variants Manager, and Megan Williams, General
15 Operations Manager.

16 (Thereupon, Ms. Forney exited the dais and Ms.
17 Passet and Ms. William were seated at the dais.)

18 CHAIRWOMAN MS. HAYES: Devin Baxter.

19 MS. BAXTER: Devin Baxter from Baxter Law on
20 behalf of multiple MMTCs.

21 My comments on this rule are limited to the
22 portions requiring the label to be affixed and
23 readable. And the rule also requires certain
24 warning language to be prominent and conspicuous.
25 And that tracks what's in the current emergency

1 rule.

2 But one thing that we have encountered is that
3 it seems to sometimes be a moving target. So, in
4 other words, we'll have had a label, or the way
5 we're applying a label approved for quite a while,
6 and then we'll submit a variance and we'll get
7 something back saying that the warning language is
8 not prominent enough or something like that.

9 So, I think the fix could either be making
10 this a little bit more specific about what those
11 terms mean, or providing more guidance to
12 licensees, because when we get it back in the form
13 of an RAI or a denial, it sets product approvals
14 back quite a while, which is tough on MMTC.

15 And then if it turns out that we do need to
16 modify the label, or the Department thinks we need
17 to modify the label, then we have to go back and
18 address the labels that are previously approved and
19 currently on shelf. So, it can be quite a burden.

20 Thank you.

21 CHAIRWOMAN MS. HAYES: Thank you.

22 Were there any additional comments?

23 (No response.)

24 Next, we would like to open the floor for
25 comment on Rule 64-4.221 MMTC, Seed-to-Sale

1 Tracking System Integration.

2 And we will only be accepting comments on this
3 rule at this time.

4 Joining the panel now is Joshua Sterns,
5 Project Manager.

6 (Thereupon, Ms. Passet and Ms. Williams exited the
7 dais and Mr. Sterns was seated at the dais.)

8 CHAIRWOMAN MS. HAYES: Nick, from The Doc App.

9 MR. GARULAY: This is on what rule?

10 CHAIRWOMAN MS. HAYES: 64-4.221 Seed-to-Sale
11 Tracking System Integration.

12 MR. GARULAY: Right. Perfect. That came a
13 little quicker than I expected. I apologize here
14 for being caught off guard.

15 So, my name is Nick Garulay. I'm the founder
16 and CEO of The Doc App. We're a patient-management
17 platform established in 2016. I flew up here from
18 Naples, Florida this morning.

19 First, I want to commend the Department for
20 building one of the most sophisticated medical
21 marijuana regulatory systems in the country.
22 Florida successfully tracks cannabis from seed-to-
23 sale.

24 Today I'd like to discuss the next evolution
25 of the progress, tracking the patient outcomes

1 while strengthening transparency, accountability,
2 and program integrity. The current system tracks
3 products, not outcomes, right. That's a bit of a
4 problem.

5 Today we know what products are dispensed;
6 when they're dispensed; which routes are purchased;
7 which physician issued the recommendation; when
8 physicians exemptions are granted. However, we do
9 not systematically know whether the potential
10 patient has improved their quality of life; which
11 products work best for that specific condition;
12 which routes provide the best outcomes; whether
13 physician exemptions improve the patient's care.

14 I think -- we I'm going to comment on the RFP
15 exemption here on the next opportunity as well, and
16 which treatments deliver the highest patient
17 satisfaction. We track transactions. We're not
18 tracking the positive outcomes or the outcomes of
19 patient access.

20 My second point is we need to create an
21 integrated cannabis ecosystem to where we can all
22 communicate, bridging the gap between the doctor,
23 the patient, the dispensaries, or seed-to-sale and
24 state regulators.

25 The physicians need guardrails put in place as

1 well as the patients do, for treatment outcomes,
2 product efficacy, side effects, quality of life,
3 the seed-to-sale participants, product performance
4 insights, quality and consistency, feedback, de-
5 identified patient outcome trends.

6 For regulators, we need program oversight,
7 population health trends, policy validation,
8 program integrity and monitoring.

9 I'd like to establish a voluntary patient-
10 outcome-pilot program. We're not requesting
11 additional mandates, that's for sure. We
12 definitely have plenty of those. We're proposing a
13 voluntary pilot program with de-identified data
14 that allows participating patients to contribute
15 outcome information.

16 I actually have a patient facing app. We have
17 52,000 patients on our platform. I have \$3.5
18 million invested in the platform that I built so
19 far. It's specifically built for compliance for
20 the medical marijuana program.

21 So, the data that we have aggregated over the
22 past ten years is really incredible. I wish I
23 could demo it on the screen for everybody because
24 it's pretty incredible. Fifty-two percent of our
25 patients reduce their reliance on prescribed

1 medications. Sixty-seven percent of our patients
2 reduce their reliance of alcohol. Eighty-six
3 percent improve their quality of sleep. And those
4 are just some examples of some of the statistics
5 that I could show.

6 But I wanted to introduce a potential pilot
7 program for us all to integrate. We need a
8 sounding board, a communications board as well, for
9 product recalls, especially, but also for - too --
10 for doctors to communicate with the office.

11 There is the MQA, which is proven to not be
12 that efficient. I was just speaking at the FMCCE
13 for the medical marijuana doctors on Sunday and it
14 was well established that the MQA has been a total
15 fail.

16 So, we need a sounding board to where, you
17 know, bad actors can be reported as well. The more
18 we implement or restrict our rules and regulations
19 for this program, the more of a way -- paved way
20 for bad actors to come in and take over the state.

21 So, that's really kind of why I'm here to
22 propose a potential pilot program. And I'm going
23 to submit the data sets that I need to, within the
24 email, within the guidelines. So, that's all for
25 that subject.

1 Thank you.

2 CHAIRWOMAN MS. HAYES: Thank you.

3 Are there any additional comments?

4 (No response.)

5 Next, we would like to open the floor for
6 comment on rule 64-4.222, MMTC STS Tracking System
7 Procedures.

8 And we will only be accepting comments on this
9 rule at this time.

10 Savannah Bailey.

11 MS. BAILEY: Good morning. Savannah Bailey
12 with Trulieve.

13 Trulieve processes approximately 30,000
14 transactions per day. If the medical marijuana use
15 registry is unavailable, thousands of patients
16 could be prevented from accessing their medication,
17 creating a significant disruption to patient care.

18 Rather than adopting language that would
19 prohibit dispensing during a registry outage,
20 Trulieve believes it is more appropriate to rely on
21 its existing OMMU approved contingency procedures,
22 under which transactions are recorded manually and
23 uploaded to the registry once system connectivity
24 is restored.

25 In the event of a seed-to-sale system outage,

1 Trulieve would also provide the office with a
2 complete itemized report of all manually dispensed
3 transactions that occurred during the disruption.

4 Trulieve respectfully requests that the
5 reporting window be extended from 24 hours to 72
6 hours, which would allow sufficient time to gather
7 and validate transaction data from 168 retail
8 locations and ensure a more accurate submission
9 with fewer errors.

10 Thank you.

11 CHAIRWOMAN MS. HAYES: Thank you.

12 Were there any additional comments?

13 (No response.)

14 Next, we would like to open the floor for
15 comment on Rule 64-4.224, Dosing and Supply Limits
16 for Medical Marijuana.

17 And we will only be accepting comments on this
18 rule at this time.

19 Joining panel now is Casey Hurley, OMMU IT
20 Manager.

21 (Thereupon, Mr. Stern exited the dais, and Ms.
22 Hurley was seated at the dais.)

23 CHAIRWOMAN MS. HAYES: Nick, from The Doc App.

24 MR. GARULAY: Hello again.

25 So, we meet again, Casey. It was just a

1 couple of days ago.

2 So, the RFP, right? That's what the subject's
3 about, right, the RFP exemptions?

4 CHAIRWOMAN MS. HAYES: Uh, dosing and supply
5 limits.

6 MR. GARULAY: Okay. Which falls in line with
7 the exemptions, right? So, dosing and supply
8 limits.

9 Okay. Well, I propose, once again, a pilot
10 program de-identify with patients to monitor the
11 positive outcomes of the purchase -- of the
12 products that they're purchasing from dispensaries.

13 We are, again, restricting the amount of
14 milligrams that patients can access over a seven-
15 day-rolling allotment. There, I think from the,
16 uh, presentation that I made as well as the Q and
17 A, which Casey was part of up in the FMCCE, the
18 doctors or physicians and regulators are so focused
19 on standardized dosing and there's no such thing,
20 right.

21 Medical marijuana is, is an individual
22 response, meaning everybody's different. So,
23 specific doses, specific milligrams apply for
24 specific conditions. And there's a lot of
25 variables in place, or that take place, including

1 blood sugars, hormones, just as an example, how
2 much food is in the belly, stuff like that. So, I
3 think the standardized dosing has become a little
4 bit of a failure for this program.

5 And if we focus on monitoring patient usage
6 and potentially justifying their usage or
7 restricting their usage, I think with a platform
8 which I have in place, I'd be happy to implement
9 that.

10 And again, I'm proposing a pilot program to
11 put that concept into fruition. So, that's why I'm
12 here today again.

13 Thanks.

14 CHAIRWOMAN MS. HAYES: Thank you.

15 Are there any further comments?

16 (No response.)

17 If there are no further comments, I would like
18 to thank you all for your participation in this
19 hearing.

20 We will accept written comments and material
21 until 5 PM, June 10th, 2026. Please submit your
22 comments in writing that include suggested language
23 to the OMMURules@FLhealth.gov inbox.

24 There being no further comments, I would like
25 to inform you that this hearing is closed.

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Thank you.
(Thereupon, the hearing concluded at 9:33 AM.)

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CERTIFICATE OF COURT REPORTER

THE STATE OF FLORIDA
COUNTY OF MIAMI-DADE:

I, MARTHA SUTHERLAND-VIDAL, a Court Reporter
in and for the State of Florida at Large, do hereby
certify that I was authorized to and did report the
proceedings in the above-styled cause before the
Department of Health, at the time and place set forth;
that the foregoing pages, numbered from 1 through 30,
inclusive, constitute a true and complete record of my
notes.

I further certify that I am not a relative,
employee, attorney, or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorney or counsel with the action, nor am I
financially interested in the action.

DATED on this 3rd day of June 2026.



MARTHA SUTHERLAND-VIDAL,
Notary Public-State of Florida