



Subject: Concerns Regarding Proposed Hemp Beverage Legislation

Dear Representative,

My name is Mark Slaugh, Founder and CEO of iComply, a Colorado-based cannabis compliance firm established in 2011. For nearly two decades, I have worked directly with regulators, licensees, and policymakers across Colorado and nationally to support the development of safe, compliant, and equitable cannabis markets.

I appreciate the legislature's continued effort to bring clarity to the evolving cannabinoid marketplace. However, I write to express my opposition to the [proposed hemp beverage bill as recently reported on in the Westword](#).

In its current form, as I believe it presents significant risks to Colorado's regulated marijuana industry, consumer safety framework, and long-term policy integrity.

Colorado has spent years building one of the most robust regulated cannabis systems in the country—one that prioritizes product testing, supply chain transparency, youth prevention, and accountable licensing. This system is now facing increasing strain.

The Marijuana Enforcement Division (MED) has already noted that “**hemp-derived intoxicating cannabinoid products [are] undercutting the Regulated Marijuana industry**” as a contributing factor to current market challenges in its most recent 2025 Enforcement Activity Report.

The proposed legislation, as drafted, risks accelerating this dynamic in several key ways:

- **Regulatory Arbitrage & Market Displacement**
Allowing intoxicating hemp beverages to be distributed through alcohol-like channels—particularly with out-of-state sourcing—creates a parallel market that bypasses the regulated marijuana system entirely. This undermines licensed operators who are held to significantly higher compliance, testing, and tax burdens - while hemp companies have simply exploited a “no-rules” loophole in Federal law and are expecting to continue to do so in Colorado with this Bill.
- **Consumer Safety & Testing Disparities AND Greater Market Access?**
Marijuana products in Colorado are subject to rigorous contaminant, potency, and tracking requirements. Expanding access to intoxicating hemp-derived products without equivalent standards introduces inconsistencies in consumer protections and erodes public trust. Doing so while ALSO allowing these products to be sold by the 24-pack at the local grocery store, gas station, and bar is not in the best interests of public safety.



- **Dose & Product Parity Concerns**

The allowance of 10mg THC-equivalent hemp beverages directly competes with regulated marijuana products (*which also have a maximum serving size of 10mg*), while being marketed as “low-dose” in this Bill. This creates confusion for consumers and places regulated operators at a competitive disadvantage. Low-dose in the marijuana world is typically 2.5mg to 5mg as a portion of a single serving size by regulation.

- **Equity & Industry Stability Risks**

Social equity licensees and small operators — many of whom have only recently entered the market — are particularly vulnerable to displacement from an influx of less-regulated, lower-cost products. Without guardrails, this bill risks reversing hard-fought progress on inclusion. Rather than including these folks into the three-tiered distribution model being proposed in this Bill, it fails to include or recognize them. Continually repeating mistakes made in marijuana, isn't reflective of Colorado's values of inclusivity and fairness.

- **Enforcement Complexity**

The MED is already actively addressing compliance gaps and bad actors within the regulated system, including attempts by unlicensed or previously revoked individuals to re-enter the market. Introducing an adjacent intoxicating product category with different oversight structures will further strain enforcement capacity and complicate compliance monitoring. In fact, there is no monitoring for the brewery out of state sending these products to Colorado by any Colorado officials and its in direct violation of Federal Law which proposes closing the “total THC” loophole in November 2026.

I am not opposed to thoughtful integration of hemp-derived products into Colorado's broader regulatory framework. However, any such policy should:

- Maintain **parity in testing, tracking, and safety standards**
- Prevent **out-of-state regulatory arbitrage**
- Ensure **dose alignment with intended “low-dose” definitions**
- Protect **existing regulated licensees and social equity participants**
- Align distribution models with **Colorado's established cannabis framework**, rather than replicating alcohol systems that do not account for cannabinoid-specific risks
- Allow for marijuana to be sold through similar distribution channels and means as low-dose products to encourage domestic competition.
- Allow Hospitality licensees to sell alcohol if traditional bars can sell hemp beverages.

Colorado has long been a national leader in cannabis policy because it has taken a deliberate, balanced approach. I urge lawmakers to continue that tradition by revisiting this bill and ensuring it strengthens—not weakens—the regulated system we have built.

I would welcome the opportunity to discuss these considerations further or provide technical insight based on my experience working within Colorado's regulatory environment.



Respectfully,

Mark Slaugh

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Senate Finance

04/28/2026

SB26-164 Regulation of Lawful THC Beverages

Typed Text of Testimony Submitted

Name, Position, Representing	Typed Text of Testimony
Ian Miller Against themselves	<p>With regard to this subject matter, there are already companies in a majority of US states that are licensed and regulated to both (1) handle THC as a highly-regulated active ingredient and (2) manufacture safe, reliable, efficacious products containing THC and other cannabinoids as API. The alcohol companies in the USA are NOT, in any way, licensed to do so today. The alcohol manufacturers and their lobby already have a swim lane to exist and compete within, and they should remain inside of it. We are counting on you to ensure that they do so. Their attempt to steal market share from existing licensees via maneuvering before you is shameful and should be stopped in its tracks.</p> <p>Thousands of small firms around the nation have risked time and capital for the better part of two decades to have the privilege of operating within the bounds of their respective State's regulations regarding THC. The sole result of suddenly allowing the alcohol companies to access that market - a market where they have not invested time, energy, or capital, except to tall your auspices that you should aid and abet them in stealing it for themselves - will be to destroy the jobs of tens of thousands of American workers and the companies, investments, and livelihoods of thousands of hard-working American entrepreneurs, shifting profits to large corporations that are, in many cases, not even owned by Americans. Are you really going to consider pulling the rug out from under an entire nascent industry of hard-working American entrepreneurs to favor another industry full of non-entrepreneurs just because they can flex expensive lobbyists? That's just not American - it's materially facilitating and enabling an oligarch class and depriving entrepreneurs of their American Dream to work hard and move up the ladder through their thoughts and labor and by taking risk.</p> <p>If the liquor lobby is seeing declining profits selling one of the most destructive substances on earth " a known poison and strongly suspected carcinogen " why would you trust them with something else that is not a known poison? Instead, if I may suggest, let them</p>

	<p>figure out how to fix their business model; don't give them someone else's business model to monopolize. Please leave THC and legal cannabis to those who have fought for it and risked everything to bring both historic change and the opportunity of participating in a broader market to the present day “ those who already have the licenses and earned them.</p>
<p>jeany rush Against themselves</p>	<p>TO: SENATE FINANCE COMMITTEE RE: SB26-164 REGULATION OF LAWFUL THC BEVERAGES SPONSORS: S WOODROW M MARTINEZ, J GONZALES FROM: JEANY RUSH COLORADO CONSTITUENT 4-28-26 VOTE: NO “Drown Your Sorrows in a Bottle of THC?” FOLKS: You as a body, have made it your mission to redefine “ ROCKY MOUNTAIN HIGH,” COLORADO. Let’s get this straight! Regulate manufacture, distribution, sale, and consumption!..lawful THC Beverages! Hemp Products Manufacturer to register with CDPHE under their rules for product labeling, production, transportation, selling? So now you want someone to be controlled by you the state, who cannot even protect minor children from bodily mutilation, and the CDPHE who cannot even protect any of us from tons of poisons in all the illegal, fake shots, covid, vaccines for newborns against sexual diseases, when a newborn is not even having sex? The same people who have ignored so many dangers against our very bodies and lives? You wanted to become Pimps, Traffickers, Drug Dealers, Doctors, Land Barons, and now you revert back to Drug Dealers to make money on fees, regulations, & penalties. You do know how commerce thrives right? NOT LIKE THIS! SO, THEY KNOW A LOT ABOUT MARIJUANA, CANNABIS, AND THC, but still more to learn. Unfortunately, THC dosing is not yet an exact science, and it takes guesswork, and experimentation to learn what works for you and how your body will react. (GIGLI) Like Pelosi, with the ACA act, we have to pass it to see what is in it? Ingesting THC means it goes a bit slower, and during that time of waiting to feel it, many can overdose, accidentally, of course, and so they can get more out of it than anticipated. Greening OUT they call it.</p>

	<p>The Potential for negative side effects include anxiety, medical and mental issues, panic attacks, and gut issues, stomach.</p> <p>10-20 mg. of the drug gets folks the happy place, but newbies™ should start with 1-2.5 mg. So Hey, If they take too much, like 20 mg., they could get a bit euphoric, but hey- WHAT DO YOU CARE, YOU JUST WANT TO DEAL AND COLLECT! YOU even allowed packets of fentanyl to be distributed, whereby 1000 or more kids could die! WHO KNEW THAT YOU WERE LOCK STEP WITH THE WORLD ECONOMIC FORUM GLOBALISTS? You need to change your names to Pimpin Drug Handlers! Donâ€™t forget pot is much stronger today than your grandparents day! BOIL THE FROGS SLOWLY, AND LET THEM BE UNAWARE â€“ ROCKY MOUNTAIN HIGHED?</p>
<p>Joshua Hindi Against Cold Baked llc</p>	<p>If THC beverages are allowed to be sold outside of the MED and cannabis regulatory system in colorado it would be extremely damaging to the already declining Cannabis industry. We would be forced to compete with outside hemp THC from unregulated sources. Inversion of these products illicitly into the regulated system is already tanking prices and hindering business growth for compliant operators. If this passes our cannabis market would be undermined by large scale national CPG producers as well. Please vote against this measure and support local business</p>
<p>Maureen Dube-Savage Against themselves</p>	<p>A hemp product offered to the public at 10 mg should follow the same current dose guidelines as current regulated market and should come into the regulated space. Another solution is to loosen all regulated 10 mg edible product and allow as herbal/wellness products in normal commerce channels. If an amendment is offered, reviewing current dosing from other regulated markets would offer guidance to the threshold of what is the level of mg for intoxication and where intoxicated molecules can be sold. Marinol is in 5 mg doses, regulated market is 10 mg , hemp market is 1.75 mg with a 15:1 ratio with hemp - if hemp products are allowed to be 10 mg and offered to the public , then this bill will confuse the public and possible risk to naive consumers at a 10 mg dose , and undermine the regulated market.</p>