

Hon. Rep. Joseph Solomon, Jr. Chair
House Corporations Committee
Rhode Island General Assembly
82 Smith Street
Providence RI 02903

April 9, 2025

RE: H6056- Rhode Island Hemp THC- Infused Beverages Act
State Licensed Cultivator Comments

Dear Chairperson Solomon and Members of the House Corporations Committee:

I am Peter Kasabian, owner of Donovan O'bair LLC license number Cv0112 DBA LOUD. I have personally invested well over a million dollars of my own personal funds in plant and equipment here in my home city of Warwick RI. We currently employ 6 full-time workers here in RI at 35% production capacity. We are running at 35% capacity trying to survive because of the current disastrous state of our cannabis market here in RI.

Allowing any delta 9 THC to be sold on store shelves here, in RI, is an epic public safety disaster. It also negatively impacts licensed cannabis operators who are struggling to stay in business and maintain jobs for our employees to go to every day.

If the state wants delta 9 to be made available to our citizens, then we should have it manufactured and TESTED here in RI. It should be highly regulated, similar to what is required for the current marijuana program. The state already has the infrastructure in place; licensed producers, testing labs, retailers and regulatory authority.

First, delta 9 is considered delta 9 because producers test the plants before they harvest, right before the plants produce THC. This is manipulated and done strategically to circumvent the law, and to fall under the hemp act. THC doesn't start to form until 2 weeks pre-harvest. Therefore, this leaves producers with a "passing" test from a lab that is not licensed or regulated by the state of RI. There is no way of verifying the integrity of the test, or the integrity of the lab or unscrupulous producers of the delta 9 raw materials.

All that is known at this point is that there is a doctored-up certificate of analysis. That COA can also be used and reused again and again, harvest batch after harvest batch. There are no ways to regulate and control that with the precision necessary to prevent poisoning of our citizens with heavy metals such as lead, cadmium and mercury etc. by unlicensed companies, and unregulated, opportunistic and unlicensed unscrupulous operators.

For example, one heavy metal in particular we are all very familiar with is LEAD. We are concerned about LEAD contamination and have exposure limits here in RI. Lead exposure limits is also heard and debated by legislators right here in this same room. Why would we regulate it to protect RI citizens on one night here at our state house, then the next night we have a bill to put it into our drinks. Does that make any logical sense?

There most likely will be HIGH levels of heavy metals, and/or highly concentrated levels of pesticides in any type of non-tested public consumable. This includes not only beverages but also edibles, vape carts and flower/pre rolls. Transparency is lacking, and we just don't know what is being consumed. All of RI'ers who choose to consume these products now are at risk of being POISONED.

Why have regulations for cultivators and marijuana retailers as well as THC, just to let our guard down tonight on public safety by allowing untested and unregulated synthetic THC to be readily available in other types of retail stores. That doesn't make logical and reasonable sense.

We urge you to not support H6056- Rhode Island Hemp THC- Infused Beverages Act

Thank you,

Peter Kasabian

Owner

Donovan Obair LLC

DBA LOUD

Lic # CV0112