

Exhibit #31

EDWARD MAIER: We're ready to proceed and my understanding is that we are at 2.1 on our agenda, the petition to request reclassification of marijuana. And, what we've heard on that is that we have some suggestions from the last time around from the subcommittee. And, we voted to table it. And, so I'm going to open it up here to the board for some discussion at this point and see where we want to go from here on that topic.

JAMES MILLER: Well, I think we should limit our discussion to the cannabidiol that was acted on by the Iowa legislature. The Iowa legislature did not, certainly had discussions about reclassifying marijuana, and they did not take any action on that. I think their purview demands that they would, but they did take action as far as addressing cannabidiol. And, so I think we can, we could uphold the act. But as far as the rest of the 400 components of the marijuana plant that are listed, I don't think we have any purview there.

SUSAN FREY: I guess I would agree with that, simply because as a board our procedure has always been in the past that we name the specific compound or chemical entity. For instance, we don't just recommend that we reschedule all pain killers, because there's different levels, they are used for different things. And, so, I would, I think that's probably been our biggest stumbling block, is just by saying marijuana it's not specific enough. So, I would simply, we already have legislation that has addressed the cannabidiol oil, and that we recommend reclassification of that product. And, as scientific and medical information comes along for other derivatives, since we already have Marinol that is scheduled, that's a marijuana derivative or THC product, a chemical entity of marijuana, it's already scheduled. I think we should address each individual chemical as they become, or entity as they become available. So, that would be, I would second Jim's recommendation that we address simply the cannabidiol oil to bring us in compliance with the legislation.

MEGHAN GAVIN: Can I interject one second?

SUSAN FREY: Sure.

MEGHAN GAVIN: The board is certainly able to make your recommendation as narrow as you want. The actual petition, however, itself is for the reclassification of marijuana. So, if you're going to go down the route as has been suggested, you

would deny that recommendation in total and make your more specific recommendation. That would be the procedure.

SUSAN FREY: Okay.

JAMES MILLER: I would move that we ...

EDWARD MAIER: Just a second. I think that we need to have a little more discussion from the members of the committee who made the recommendation. I'd like to hear if they have any input on what's just been said.

SHARON MEYER: Well, I think as a pharmacist we all have that scientific viewpoint that if a particular chemical or compound that has some medical effect, it would need to be studied and researched and standardized. And, that's what we prefer for dosage forms for patients. As a member of the subcommittee I think what we wrestled with is what is currently in the code that has language to the effect that if a substance is currently in schedule 1 is found to have some medical benefit then perhaps it should be considered schedule 2. I think that's kind of where we as a subcommittee were going is because we were following what's in the Iowa Code now to make recommendations.

LADONNA GRATIAS: And, also the legislature did pass medical marijuana. It was told to us that it really was a schedule ...

EDWARD MAIER: That was cannabidiol oil.

JAMES MILLER: Just one component.

LADONNA GRATIAS: Right.

SUSAN FREY: Well, I guess ...

JAMES MILLER: I would say, there's a product being tested in the US and UK, it's being tested in human subjects in a product that has both THC and cannabidiol. It's been in clinical trials. So there are some standardized products being developed. But to consider the whole marijuana plant I think is way beyond the scope of what ...

SUSAN FREY: I guess I'm, in retrospect, it makes sense to me that if you can use the analogy of opium, opium is in schedule 1. So, it's a raw plant. And, so it has medicinal value. It's in schedule 1. But, yet, we have morphine, which is in schedule 2, which is a direct derivative of that plant. To me, that's where this should fit. We should keep marijuana in schedule 1, but then the chemical entities that developed from that should go into schedule 2.

EDWARD MAIER: Okay, I guess I agree with Sharon from the perspective of the group. That is what we struggled with. But we also struggled with the fact that I don't think any of us were completely ready to say we want to jump both feet in and say that we think there should be a medical marijuana program in this state. That's not, at least from my personal perspective, and I think I recall a conversation that was a part of it, because it is such a broad thing. And, there is such a variance in potencies of the plant. It's a very hard thing to get your hand on scientifically. We've heard some people say there's some uses for derivatives, but, you know, at this point and time we're still, we need more research. But schedule 1 and schedule 2 both allow research. One point that I really am, because I'm really, I'm really strong on, because I've been here for the last six years and we've struggled with this, there are conflicting citations in the code. One place it says its schedule 1 except by rules of the board and one place it says its schedule 2 except by the board. I strongly believe that we need to recommend, or that we need to do something legislatively to clear that mess up, whichever way we go.

JAMES MILLER: There's a petition to your point and I think the petition itself talks about two places in the Iowa Code. You know, we have a legislature that is charged with writing the code in particular. I don't think they need any recommendation from us. We're not attorneys. We're here to take care of the pharmacy laws and protect the health of our citizens. So, I think that kind of stuff is way beyond our area of expertise. I don't think we have any business telling them what to do.

EDWARD MAIER: I agree with the part about the fact, probably I feel more comfortable with making a recommendation of cannabidiol than I do on marijuana. Personally, if somebody's willing to make that recommendation, then I'm willing to go ... I don't think we can just deny this request and move away because the legislature's already said that there is some use for cannabidiol. If we're allowed to turn around then and make a recommendation for cannabidiol, I'm willing to say

we deny the marijuana part of it and we just include the cannabidiol and recommend that the change be made to delete those references to the rules of the board.

MEGHAN GAVIN: Well, your proposal then would be to make clear that the legislature would have to act before marijuana would be rescheduled, then the board would not be committed to establish a marijuana program.

EDWARD MAIER: That's what I'm thinkin'. Our idea is that we don't have the power to establish a marijuana program. We can't write those rules because they're too broad. But, yet, there's a suggestion there that we should, and that's not right. That's the legislature's prerogative, not our prerogative. And, those things need to be out of the code.

SUSAN FREY: I agree that if we deny the petition, that we should turn around and do a recommendation for the cannabidiol oil. But, then, perhaps we should move the other part of that as a piece of legislation to be entered in and not part of a suggestion.

EDWARD MAIER: And I'm perfectly agreeable to that. I was thinking to make that change as a part of the whole thing. It's going to keep coming back to us as rule making and those are those outdated wording that has been there for years. That kind of a program is way too broad for one board. It would be way too broad for the board of medicine, or the board of nursing, or anybody else to write those kinds of rules. So, I guess I would entertain ... Is there any other discussion? Okay, I would entertain a motion from anybody.

EDWARD MCKENNA: I think we already have a motion.

EDWARD MAIER: Just a second now, we have a comment.

CARL OLSEN: Opium plants are in schedule 2, not schedule 1. And coca plants are in schedule 2, not schedule 1. We don't have any plants in schedule 1 from which any medicines are derived. So, that was an incorrect statement. If you want to normalize the act, you recommend marijuana be classified like opium poppies and coca plant because that's where we put plants that are the source material for these derivatives like cannabidiol.

JAMES MILLER: Duly noted. I'll make a recommendation that we deny the request.

SUSAN FREY: And I will second it.

EDWARD MAIER: Any further discussion? All those in favor, aye.

ALL BOARD MEMBERS: Aye.

EDWARD MAIER: Opposed? Okay, the motion has been denied. Does anyone have any further recommendation they would like to ...

SUSAN FREY: I move that we recommend to the legislature to reschedule cannabidiol oil to schedule 2.

MAIER: Second. Any further discussion?

EDWARD MCKENNA: The only discussion I have on it is, how broad is that? In other words, if you have morphine scheduled like 15 mg, 30 mg, different things like that? How do we know if there's other ingredients in that oil? What are we recommending? In other words, there are certain companies out there that make that. Are they legitimate companies?

EDWARD MAIER: And, that's already been said. I think at this point the legislature has recognized the medical use for it and that is our criteria.

EDWARD MCKENNA: Right.

EDWARD MAIER: But, duly noted that there are concerns, a major concern.

JAMES MILLER: Another major concern, according to DEA it's schedule 1. So, every pharmacy in the state has to have a DEA license and you have to abide by that license. So we would all be breaking the law if we had a cannabidiol product. Its consistent with the legislative act, but nothing else.

MEGHAN GAVIN: I think, I want to say this accurately, the classification of cannabidiol under federal law is a little bit of a gray area at the moment and time.

Some people believe it to be part of schedule 1 as marijuana and some people believe it to be unscheduled. There's no definitive statement. And, to my knowledge I don't believe DEA has taken a position publicly on it.

EDWARD MAIER: Carl, do you want to ...

CARL OLSEN: The DEA website clearly classifies cannabidiol as schedule 1.

EDWARD MAIER: So, if we were to go to schedule 2, we would still be ...

CARL OLSEN: It has a drug control number, 73 something.

JAMES MILLER: But the derivative product being approved, you know, in the approval process, includes the cannabidiol that is in the act.

SHARON MEYER: Just for the sake of discussion, is something that is needed possibly something the legislature needs to address with that? That a substance, cannabidiol is included in this to the legislature? That is is a schedule 1 substance? Is that something that really the legislature needs to address, that there is conflicts in the code? So, I don't know if we're recommending that it should go to schedule 2 or that the legislature needs to address that there's a conflict.

EDWARD MAIER: Your motion, Jim.

SUSAN FREY: It was my motion.

SHARON MEYER: We were also trying to think of other potential derivatives that may come on the scene, that there are active uses for. And, we were going to the conundrum of the scheduling of schedule 1 / schedule 2, the other derivatives, the federal, the state. So, I feel its like as a member of the subcommittee, that's where we had a tough job because there is conflicting code.

EDWARD MAIER: The code says cannabidiol. So, if we change cannabidiol, we're following what the legislature did. The subcommittee had already recommended schedule 2 anyway.

JAMES MILLER: It's totally correct. There's no product. There's conflicting code. I think the only thing we're doing with this recommendation is supporting the cannabidiol legislation that this particular product has some use, possible use in cases of epilepsy.

SUSAN FREY: So, are you offering a friendly amendment?

EDWARD MAIER: No, I just wanted to clarify because of the question she brought up. This is a change.

SUSAN FREY: That's where I want to see this going. If the existing program, whichever is being developed, we don't know what that is, the department of public health, whether that's going to involve, what distribution system, we don't know. So, I guess, putting it in schedule 2 makes it more readily available if that comes to, once those plans and design is available.

EDWARD MAIER: Any other discussion? We have a motion to reschedule cannabidiol to schedule 2. All those in favor, aye.

ALL BOARD MEMBERS: Aye.

EDWARD MAIER: Opposed? Okay, the motion is carried. And I would commend the subcommittee. And I, when we get to the legislation, we need to talk about what we said. The other thing is that's going to get lost in this is that we really felt now, twice, bodies of the board have said something about there being a committee of a cross section of people from multiple disciplines that take a look at either cannabidiol oil or marijuana or whatever it is. And, I hope that this doesn't just get lost in the record that somewhere a committee forms and takes it seriously. With that, we're going to move on.

TERRY WITKOWSKI: Question. Do you want to go ...? Do you want to have a recommendation that the legislature look at the current language that talks about the board of pharmacy adopting rules for medical? Because neither of these motions really address any kind of a recommendation to them regarding that.

EDWARD MAIER: Susan was talking about that. We look at that as a piece of legislation that goes up. Or would that have to be a recommendation?

TERRY WITKOWSKI: If you want to propose any legislation now, you'd have to get a legislator to do it because we're beyond the deadline for pre-filing.

SUSAN FREY: Okay.

EDWARD MAIER: I'd like to see a recommendation.

SUSAN FREY: And, refresh my memory, Terry. What is it that we need to review, or to remove from ...?

TERRY WITKOWSKI: There is a provision in schedule 1 that makes an exception or an exemption for marijuana when pursuant to rules of the board for medical marijuana program. There's a provision in schedule 2 that, along that same line, that says that marijuana is a schedule 2 substance pursuant to rules of the board. So, it makes an exemption out of schedule 1 and an exception into schedule 2, both of them pursuant to rules of the board for a medical marijuana program. So, your recommendation could simply be to eliminate those two provisions.

EDWARD MAIER: And the reason being that our authority is too narrow to adopt the rules.

MEGHAN GAVIN: You could just remove "pursuant to rules of the board." That's all you have to say.

EDWARD MAIER: In both places. Would you like to make a motion to make that recommendation?

SUSAN FREY: Okay, here goes. I move that we send a recommendation to the legislature to remove in schedule 1 concerning marijuana the exemption ... No, I mean in schedule 1, giving the exemption for a medical marijuana program, I suggest we remove the wording "pursuant to rules of the board of pharmacy," or, "the board." Okay, because the board does not have the authority to establish a program. And, I further recommend that the exception of a medical marijuana program that we remove the wordage "pursuant to rules of the board" for that same reason, that the board does not have authority to publicate those rules.

EDWARD MAIER: Do we have a second?

JAMES MILLER: Second.

EDWARD MAIER: Discussion? All those in favor, aye.

ALL BOARD MEMBERS: Aye.

EDWARD MAIER: Opposed? Carried.