



April 16, 2018

Jared Redulla  
Acting Administrator  
Narcotics Enforcement Division  
3375 Koapaka Street, Suite D-100  
Honolulu, Hawaii 96819

Dear Administrator Redulla,

I am currently researching potential solutions for the inter-island transportation of cannabis for testing purposes, and was hoping to get your opinion on which circumstances would cause any related transfer and/or transportation of such samples to be considered distribution under state law.

I was also hoping to get your opinion on federal aviation regulation 14 CFR 91.19, as it applies to such inter-island transportation.

Could you please include any relevant citations in your reply so that I may better understand the basis for your positions.

Appreciate your help.

Clifton Otto, MD