



**COLORADO**  
**Department of Revenue**  
Enforcement Division - Marijuana  
1707 Cole Blvd., Suite 300  
Lakewood, CO 80401

February 21, 2019

Sent via email

Mr. Jim Monaco  
Summit Wellness d/b/a DENREC Denver Recreational Dispensary

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Mr. Monaco:

This letter is in response to your inquiry submitted to the Marijuana Enforcement Division (“Division”) general inquiry email. The Division treats your inquiry as a request for Statement of Position pursuant to Rule M 104(A), 1 CCR 212-1. Your inquiry asked the following question:

*What is the Division’s position with regard to whether an Optional Premises Cultivation Operation’s Limited Access Area must be identified with a sign on the exterior of the building in order to conform with the Medical Marijuana Rules at 1 CCR 212-1?*

Section 44-11-105, C.R.S., requires “all areas of ingress or egress to limited access areas shall be clearly identified as such by a sign as designated by the state licensing authority.” Rule M 301(C), 1 CCR 212-1, similarly provides that “all areas of ingress and egress to Limited Access Areas on the Licensed Premises shall be clearly identified by the posting of a sign which shall not be less than 12 inches wide and 12 inches long, composed of letters not less than a half inch in height, which shall state, “Do Not Enter – Limited Access Area – Access Limited to Licensed Personnel and Escorted Visitors.” Additionally, section 44-11-901(3)(b), C.R.S., mandates that failure to designate areas of ingress and egress for limited access areas and failure to post signs in conspicuous locations are unlawful acts.

“All areas of ingress and egress” include all entrances and exits that lead directly into the Limited Access Area of an Optional Premises Cultivation Operation. Recognizing the potential of exterior signs to draw unwanted attention to regulated marijuana activities, it is the Division’s position that “conspicuous locations” may include an area immediately inside the door to a Limited Access Area, and may not require exterior signs. The Division considers interior Limited Access Area signs that conform to the requirements in Rule M 301(C) as in compliance with both section 44-11-105, C.R.S., and Rule M 301(C), when that sign is conspicuously placed immediately within an entrance that is locked against public entry and only accessible to limited, licensed personnel and escorted visitors.

Thank you for your request.

Sincerely,

James Burack  
Director  
Marijuana Enforcement Division