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September 24, 2024

From: **Nicholas Garulay**  
President and CEO  
The Doc App, Inc.  
d.b.a., My Florida Green

To: Drug Enforcement Administration  
Attn: Administrator  
8701 Morrisette Drive  
Springfield, VA 22152  
Via. Email: [nprm@dea.gov](mailto:nprm@dea.gov)

**Subject: Notice of Intention to Participate in DEA Hearing on Proposed Rescheduling of Marijuana (Docket No. DEA-1362)**

Dear Administrator,

I, Nicholas Garulay, am writing to formally notify you of my intention to participate in the upcoming hearing on December 2, 2024, regarding the proposed rescheduling of marijuana from Schedule I to Schedule III of the Controlled Substances Act.

**1. Interest in the Proceeding:**

As the CEO and Founder of The Doc App, Inc., dba My Florida Green, I have been deeply involved in the medical marijuana industry since 2016. Our platform serves over 42,000 medical marijuana patients in Florida, making it a key player in ensuring compliance and enhancing patient care. Additionally, we are launching HelloMJ, a nationwide platform that will facilitate onboarding, education, and the facilitation of medical marijuana prescriptions while maintaining ongoing relationships between doctors and patients. This platform will also aggregate data to document outcomes, demonstrating the effectiveness of marijuana as a natural alternative for medical treatments.

## 2. Issues to be Addressed:

During the hearing, I plan to cover several important topics:

- **The Importance of Protecting Medical Marijuana from Recreational Use:** I will discuss the need to ensure that the rescheduling of marijuana does not pave the way for unrestricted recreational use. While I firmly believe that medical marijuana should be legal and accessible to those who need it, it is crucial to protect the integrity of medical programs from being overshadowed or diluted by recreational marijuana initiatives. I will emphasize the dangers of recreational use and advocate for strong protections for medical marijuana patients.
- **Freedom and the Right to Grow:** In the context of personal freedom, I will argue that medical license holders should have the right to grow their own marijuana. This ability would empower patients to have greater control over their treatment and ensure access to high-quality, personalized medicine. Allowing patients to grow their own marijuana would also reinforce the principle of medical marijuana being used responsibly and exclusively for health-related purposes.
- **Enhancing Patient Education and Care:** I will discuss the importance of improving patient education and support in the use of medical marijuana. As marijuana is rescheduled, there is a need for more robust education programs that help patients understand how to use medical marijuana effectively for various conditions. The HelloMJ platform will play a key role in this process, enabling ongoing doctor-patient relationships and leveraging data to customize treatment protocols and improve outcomes.
- **The Role of Healthcare Providers:** I will emphasize the need for greater involvement of healthcare providers in the administration and monitoring of medical marijuana treatments. This is particularly important within institutional settings like the VA but is also relevant across all patient care environments. Healthcare providers need better support and resources to integrate medical marijuana into treatment plans effectively.
- **Navigating Regulatory Challenges:** The rescheduling of marijuana brings new regulatory challenges that must be addressed. I will discuss the complexities of complying with both federal and state regulations and advocate for clearer guidelines that facilitate the safe and effective use of medical marijuana across the board. This also includes addressing the legal and regulatory hurdles that impact access to medical marijuana for all patients, including veterans.

## 3. Position on the Issues:

I support the rescheduling of marijuana to Schedule III as it acknowledges the medical value of the substance and creates a framework for more consistent regulation. However, it is essential to address the broader implications for patient care, healthcare providers, and the industry. By focusing on these areas, we can ensure that the transition to Schedule III is beneficial for all stakeholders.

Thank you for the opportunity to participate in this hearing. Please confirm receipt of this notice and provide any additional instructions or requirements for participation.

Sincerely,

/s/ Nicholas Garulay

Nick Garulay  
President and CEO  
The Doc App, Inc., dba My Florida  
Green

CC: Jason K. Castro, Esq., Inhouse Counsel, The Doc App, Inc.