



CSBS Marijuana-Related Businesses Job Aid

The job aid is an examiner reference tool providing background as well as state-specific information, such as legalization status and related topics. This job aid replaces the Cannabis job aid. As federal and state cannabis laws change, we expect that frequent updates will be necessary to keep this job aid up to date. The state authorities in this job aid are updated as of January 1, 2025.

The CSBS State Supervisory Processes Committee approved the release of this job aid to assist state examiners in the examination of a financial institution that may be banking marijuana-related businesses. A separate job aid on industrial hemp was also issued. If you notice something in either job aid that needs to be edited contact John Hays (jhays@csbs.org).

Table of Contents

Marijuana-Related Businesses Job Aid	Page 2
Part I – Initial Assessment and Planned MRB Activities	Page 2
Part II – OnOngoing Risk Management	Page 7
Part III – Cole Memo Priorities	Page 18
Part IV – FinCEN Filings	Page 20
State by State Marijuana Policies	Page 22
Reference Documents	Page 27



March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Part 1. Initial Assessment and Planned MRB Activities

Marijuana-Related Businesses (MRB) ¹	Information for Examiners	Relevant Policy
<p>1. Is the institution currently banking any customers related to the marijuana industry?</p>	<ul style="list-style-type: none"> • The distinction between a direct marijuana relationship and an indirect marijuana relationship is not well defined. Customer due diligence (CDD) guidance requires that for customers who pose higher money laundering risks, enhanced procedures and processes should be followed. • The FFIEC BSA/AML Examination Manual discusses ongoing CDD for higher-risk customers, including obtaining the following from the customer: description of the business operations, the anticipated volume of currency transactions and total sales, and information about major customers and suppliers. 	<p>Pursuant to the Controlled Substances Act, 21 USC §812, marijuana is a Schedule 1 controlled substance, and it is illegal under federal law to manufacture, distribute, or dispense marijuana.</p> <p>31 CFR 1020.210(a)(2)(v) is the regulation governing CDD.</p>

Examiner Notes:

¹ This job aid uses the term marijuana-related business (MRB) to mean any business that is directly or indirectly related to the marijuana industry. States may define the term MRB differently.

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>2. How does the institution determine whether current customers are related to the marijuana industry?</p>	<p>Be aware that the identification of MRBs, especially indirect MRBs, can be difficult. Use this question to assess the robustness of the institution's CDD processes and to identify whether gaps exist related to MRB identification.</p>	<p>2014 FinCEN Guidance (FIN-2014- G001) directs financial institutions, when assessing the risk of providing services to a MRB, to collect and verify the following information from relevant state authorities:</p> <ol style="list-style-type: none"> 1. whether the MRB is duly licensed and registered, 2. if the MRB license application (and related documentation) was submitted by the business to the state authorities, and 3. any available information about the MRB and related parties. State licensing authorities are listed on the <i>State by State Marijuana Policy</i> page within this Job Aid.

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>3. Summarize the discussions that have taken place at Board of Directors meetings about banking MRBs.</p>	<ul style="list-style-type: none"> • This question is intended to help develop an understanding of how the institution's board and management team views banking the MRB industry. It is not intended to imply that specific provisions or steps should have been taken. • Examiners should expect to see an initial risk assessment to guide the board in banking MRBs. It should consider staffing and resources relative to the planned activities and the need for policies and procedures that differentiate between lending to MRBs and handling deposits of MRBs. 	<p>2014 FinCEN Guidance (FIN-2014- G001) states that the decision to open, close, or refuse any particular account or relationship should be made by each financial institution based on a number of specific factors to that institution, including: the institution's particular business objectives, an evaluation of the risks associated with offering a particular product or service, and its capacity to manage those risks effectively.</p>

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>4. Is the institution planning to permit the opening of relationships with MRBs? If so, when?</p>	<p>This question is intended to help develop an understanding of the institution's strategy (if any) related to banking MRBs.</p>	<p>2014 FinCEN Guidance (FIN-2014- G001) lays out factors that banks should consider when banking an MRB: 1) whether the MRB is violating any Cole Memo priorities, 2) whether money laundering is still occurring unrelated to marijuana, 3) whether the MRB can produce sufficient documentation for licensing, and 4) whether the state cannabis board has levied an enforcement action, etc.</p>

Examiner Notes:

If the answers to the first four questions indicate that this institution does not have any current or planned banking relationships that are related to the marijuana industry, the remaining questions on this Job Aid may be disregarded.

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>5. What types of MRBs have relationships with the institution and approximately how many accounts does this include?</p>	<p>Your state may have a regulatory body that issues certain license types to MRBs. As a starting point, identify the license types that your state licenses and ask whether any such customers have relationships at this institution. Links to state websites are listed in the <i>State by State Marijuana Policy</i> section.</p>	<p>Pursuant to the Controlled Substances Act, 21 USC §812, marijuana is a Schedule 1 controlled substance, and it is illegal under federal law to manufacture, distribute, or dispense marijuana.</p>

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Part II – On-going Risk Management

The questions in this section are designed to help examiners assess the sufficiency of the institution's risk management practices for MRBs when institutions have lending and/or deposit relationships with MRBs.

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
6. Does the institution have policies and procedures specific to banking MRBs?	There is no requirement that separate policies or procedures be developed for MRBs but if an institution has MRB customers, the handling of such relationships should be addressed in existing policies or separate policies. One important consideration is that MRBs may not be treated as non-listed businesses for Currency Transaction Report (CTR) purposes and are not eligible for an exemption from CTR requirements.	Financial institutions should adjust policies and procedures related to MRBs per FIN-2014-G001 .

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>7. Has the institution adjusted their risk assessment to include MRBs?</p>	<p>Risks specific to MRBs should be included in the institution's risk assessment if they have current or planned MRB relationships.</p>	<p>FIN-2014-G001 lays out the following risk assessment priorities if a financial institution is banking MRBs:</p> <ol style="list-style-type: none"> 1) verifying with the appropriate state authorities if the business is duly licensed and registered, 2) reviewing the license application submitted by the business for obtaining a state license to operate its marijuana related business, 3) requesting from state licensing and enforcement authorities available information about the business and related parties, 4) developing an understanding of the normal and expected activity from the business, including types of products to be sold and the type of customers to be served, 5) ongoing monitoring of publicly available sources for adverse information about the business and related parties, 6) ongoing monitoring for suspicious activity and 7) refreshing information obtained as part of customer due diligence on a periodic basis and commensurate with the risk.

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
8. How have account opening procedures been adjusted to consider MRBs?	There are no standards for account opening procedures specifically related to MRBs. However, if an institution is engaged in this industry, processes to help determine MRBs would be expected as part of CDD.	Financial institutions should adjust policies and procedures as well as CDD processes related to MRBs per FIN-2014-G001 .

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>9. Did management perform a legal review of applicable federal and state laws prior to banking MBR customers?</p>	<p>Management would be expected to ensure that any applicable licenses or regulatory requirements have been met before establishing a relationship with any MRB. These reviews should occur on a regular basis to ensure that no licenses have lapsed or no regulatory requirements have been missed by the MRB that could jeopardize their ability to operate their business.</p>	<p>FIN-2014-G001 directs financial institutions to file a "Marijuana Priority SAR" if the MRB violates state law or Cole Memo priorities.</p>

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>10. What processes are in place to identify whether existing customers have a relationship with an MRB?</p>	<ul style="list-style-type: none"> • This question is intended to encourage discussion about the institution's processes for reviewing loan customer relationships. For instance, if a borrower for a commercial property was leasing that property, or a portion of that property, to an MRB this would be an indirect MRB relationship. • Banks should have a process to identify if activity is suspicious in these indirect cases, but there is no expectation for them to scour their customer base or loans for activity that may be marijuana related. If they know about it, or identify it, then they should have a process for filing a Suspicious Activity Report (SARs). • Banks should fully document this process. 	<p>FIN-2014-G001 directs financial institutions to seek licensee information from the state licensing authority. In many instances, state law requires MRBs to disclose, through the licensing process, individuals that have financial interest in the MRB.</p> <p>Footnote 7 in FIN-2014-G001 provides more detail on this topic.</p>

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>11. Have the cash handling demands of the MRB been considered?</p>	<p>Given the current legal disagreements between state and federal law related to marijuana, some MRBs may have substantial cash inflows or outflows. Institution management should evaluate, with the MRB, what level of cash services would be anticipated. Understanding these needs prior to the establishment of a relationship would allow the institution to better detect suspicious activities.</p>	<p>FIN-2014-G001 states that financial institutions should reach out to state licensing authorities to obtain data on MRBs. In many jurisdictions, MRBs are required to disclose transactional data. Contact your relevant state licensing authority for available information within your state.</p>

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>12. For MRB borrowers, has the institution evaluated, through their allowance for credit losses or otherwise, the impact a change in marijuana's legal status may have on the institution's collateral position as a creditor?</p>	<p>This question is intended to help an examiner understand what, if any, contingency plans the institution or MRB has made for a change in legal status of marijuana. For example, if federal enforcement of marijuana law changes, there is a possibility that collateral securing the borrower's debt could be encumbered in an enforcement case or its value could deteriorate rapidly.</p>	<p>Not directly addressed in federal guidance, but financial institutions should consider preparing a strategy in the event of a legislative or policy change at the state or federal level.</p>

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>13. Does management have a contingency plan that considers a possible quick exit from this business should there be a change in the policies and forbearances from the federal and state governments?</p>	<p>As in the previous question, it would be prudent for an institution to have a plan to quickly exit or terminate MRB relationships. The assessment should consider liquidity, collateral positions, and other impacts of an abrupt separation from these relationships.</p>	<p>This is not directly addressed in federal guidance, but financial institutions should consider preparing a strategy in the event of a legislative or policy change at the state or federal level.</p>

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>14. Does the institution's blanket bond insurer require that MRB customer relationships be disclosed? If so, have those disclosures been made?</p>	<p>As in the previous question, it would be prudent for an institution to have a plan to quickly exit or terminate MRB relationships. The assessment should consider liquidity, collateral positions, and other impacts of an abrupt separation from these relationships.</p>	<p>This is not directly addressed in federal guidance.</p>

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>15. What training has been provided to staff related to the marijuana industry?</p>	<p>An effective risk management process includes maintaining an aware and well- trained staff. Training on MRBs for financial institution employees should consider BSA/AML risks, account opening procedures specific to the institution, and an internal escalation process if an employee detects changes in a customer’s risk profile.</p>	<p>This is not directly addressed in federal guidance.</p>

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>16. What challenges have been encountered through banking MRBs?</p>	<p>This question is not intended to elevate the current disagreement between the state and federal legal status of marijuana. Rather, it is intended to encourage dialogue between the institution and examiner about specific account or relationship challenges that have been encountered. Responses should help an examiner understand whether MRB relationships at this institution have been unexpectedly challenging or are carrying more inherent risks.</p>	<p>FIN-2014-G001 gives guidance to financial institutions that deem it necessary to terminate a relationship with a MRB in order to maintain an effective anti-money laundering (AML) program. Financial institutions should file a SAR and note in the narrative the basis for termination. In this instance, financial institutions should use the term "MARIJUANA TERMINATION" in the narrative section. FinCEN encourages institutions that have been made aware of previous accountholders seeking banking relationships to utilize the voluntary information sharing process as outlined in Section 314(b) of the BSA.</p>

Examiner Notes:

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

Part III - Cole Memo Priorities

A memo released by the Department of Justice, often known as the Cole Memo, provided parameters around which federal enforcement of marijuana laws will be prioritized. While the provisions of the memo could not be considered a safe harbor for financial institutions, taking steps to comply with the provisions in the memo may have reduced the risk of federal enforcement. A link to the Cole Memo can be found on the "Reference Documents" table in this Job Aid. The Cole Memo provisions are included in the FIN-2014-G001 guidance. **In January 2018, the Cole Memo was rescinded by the Attorney General. However, FinCEN has not yet updated their guidance or reference to the Cole Memo provisions.** FinCEN has advised financial institutions to continue to follow FIN-2014-G001 in its entirety, and as such examiners should continue to examine banks in accordance with that guidance.

Relevant Policy: [FIN-2014-G001](#) guidance directs institutions to consider whether an MRB implicates one of the Cole Memo priorities or related state law(s) when performing CDD. Additionally, if a financial institution finds that an MRB has violated a Cole Memo priority, [FIN-2014-G001](#) directs the institution to file a "Marijuana Priority" SAR. The guidance also lists several red flags that may indicate that an MRB may be engaged in activity that interferes with any one of the Cole Memo priorities or violates state law.

Use the following questions to assess provisions of FIN-2014-G001. Each provision is separate and designed to be answered in a yes/no manner.

17. Is the institution aware of the following Cole Memo priorities? Pursuant to FinCEN guidance, if an insured depository institution (IDI) becomes aware of an MRB violating Cole Memo priorities and/or state law, then FIN- 2014-G001 directs IDIs to file a Priority SAR.

a. Preventing the distribution of marijuana to minors? Y or N

b. Preventing revenue from the sale of marijuana from going to criminal enterprises, gangs, and cartels? Y or N

c. Preventing the diversion of marijuana from states where it is legal under state law in some form to other states? Y or N

d. Preventing state- authorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity? Y or N

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

e. Preventing violence and the use of firearms in the cultivation and distribution of marijuana? Y or N

Cole Memo Priorities cont.

f. Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana use? Y or N

g. Preventing the growing of marijuana on public lands and the attendant public safety and environmental dangers posed by marijuana production on public lands? Y or N

h. Preventing marijuana possession or use on federal property? Y or N

Examiner Notes:

Part IV - FinCEN Filings

FinCEN has provided guidance for financial institutions that governs how CTRs and SARs are to be handled for MRBs. Consistent with FinCEN regulations, the obligations to file a SAR is unaffected by any state law that legalizes marijuana-related activities. The questions in this section are intended to help examiners assess an institution's understanding of, and compliance with, the provisions of this guidance.

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>1. Are SAR filing requirements understood and followed by the institution?</p>	<p>FIN- 2014-G001 established three new SAR filings pertaining to MRBs. These should be included in a Banks BSA/AML policy if they operate in a state where there is some form of legalized marijuana. As an example, a financial institution providing financial services to an MRB that it reasonably believes, based on its CDD, does not implicate one of the Cole Memo priorities or violate state law should file a "Marijuana Limited" SAR. The content of this SAR should be limited to the following information:</p> <ol style="list-style-type: none"> 1. identifying information of the subject and related parties; 2. addresses of the subject and related parties; 3. the fact that the filing institution is filing the SAR solely because the subject is engaged in a MRB; and 4. the fact that no additional suspicious activity has been identified. Financial institutions should use the term "MARIJUANA LIMITED" in the narrative section. 	<p>Pursuant to FAQs released by FinCEN regarding SAR filing in combination with FIN-2014-G001, financial institutions that do <u>not</u> suspect that MRB account holders have violated state law or Cole Memo priorities should file a continuing activity report, with the filing deadline being 120 days after the date of the previously related SAR filing. A "Marijuana Limited" SAR should be filed using those prescribed guidelines. A "Marijuana Priority" SAR should be filed on an MRB that the institution reasonably believes, based on CDD, implicates one of the Cole Memo priorities or violates state law. A "Marijuana Termination" SAR should be filed if a financial institution deems it necessary to terminate a relationship with an MRB in order to maintain an effective AML compliance program.</p>

Examiner Notes:

Marijuana-Related Businesses (MRB)	Information for Examiners	Relevant Policy
<p>2. Does management review customer information obtained as part of their CDD program at least every 90 days to determine whether a change in SAR filing is warranted?</p>	<p>An MRB's risk profile may change quickly. This question is intended to assess how an institution manages these changing risks and whether the necessary adjustments are made to remain in compliance with FinCEN guidance. If management deems it necessary to terminate a relationship with a MRB the term "MARIJUANA TERMINATION" should be used in the narrative portion of the accompanying SAR.</p>	<p>FIN-2014-G001 recommends refreshing information obtained as part of CDD on a periodic basis and commensurate with the risk presented by the MRB. With respect to information the state licensure obtained in connection with such CDD, a financial institution may reasonably rely on the accuracy of information provided by state licensing authorities where states make such information available.</p>

Examiner Notes:

State by State Marijuana Policy

State	Medical Use	Recreational Use	State Marijuana Authority	Additional Notes
Alabama	Yes	No	N/A	Medical marijuana legalized May 17, 2021.
Alaska	Yes	Yes	Home, Alcohol & Marijuana Control Office (alaska.gov)	
Arizona	Yes	Yes	ADHS - Medical Marijuana - Physicians (azdhs.gov)	
Arkansas	Yes	No	Medical Marijuana Arkansas Department of Health	Efforts to expand medical use and legalize for recreational use failed in 2024
California	Yes	Yes	California Cannabis Portal	
Colorado	Yes	Yes	Marijuana Home DOR SBG (colorado.gov)	
Connecticut	Yes	Yes	Cannabis in Connecticut	A recreational marijuana law (S.B. No. 1201) passed and was signed into law June 22, 2021.
Delaware	Yes	Yes	Medical Marijuana Program - Delaware Health and Social Services - State of Delaware	Recreational use became law in April 2023. Sales on track to begin Spring 2025.
District of Columbia (DC)	Yes	Yes	Medical Cannabis Program	Recreational marijuana in DC is not taxed and regulated in DC, but individuals over 21 are able to legally possess and cultivate limited amounts of marijuana for recreational use under Initiative 71 . Marijuana can be donated, not sold.

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

State	Medical Use	Recreational Use	State Marijuana Authority	Additional Notes
Florida	Yes	No	OMMU – Office Of Medical Marijuana Use (knowthefactsmmj.com)	
Georgia	Yes	No	Low THC Oil Registry Page Georgia Department of Public Health	Qualified persons in Georgia can possess up to 20 fluid ounces of low THC oil.
Hawaii	Yes	No	Medical Cannabis Program (hawaii.gov)	
Idaho	No	No	N/A	
Illinois	Yes	Yes	Medical Cannabis Program - MCPP (illinois.gov)	Illinois was the first state to fully legalize through the legislative process – effective January 1, 2020. Cannabis frequently asked questions link
Indiana	No	No	N/A	Medical use of CBD oil is allowed.
Iowa	Yes	No	The Office of Medical Cannabidiol (iowa.gov)	
Kansas	No	No	N/A	
Kentucky	Yes	No	Medical Cannabis (ky.gov)	Medical marijuana approved March 31, 2023.
Louisiana	Yes	No	Medical Marijuana La Dept. of Health	Reforms moving slowly.
Maine	Yes	Yes	Office of Cannabis Policy (maine.gov)	
Maryland	Yes	Yes	Maryland Medical Cannabis Commission	Recreational marijuana use approved by voters November 2022 effective July 1, 2023.
Massachusetts	Yes	Yes	Cannabis Control Commission Massachusetts (masscannabiscontrol.com)	

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

State	Medical Use	Recreational Use	State Marijuana Authority	Additional Notes
Michigan	Yes	Yes	MRA - Marijuana Regulatory Agency (michigan.gov)	
Minnesota	Yes	Yes	Medical Cannabis - Minnesota Department of Health (state.mn.us)	Recreational marijuana use signed into law on May 30, 2023.
Mississippi	Yes	No	Mississippi Medical Cannabis Program	Medical marijuana law signed by governor on February 2, 2022.
Missouri	Yes	Yes	Medical Marijuana Regulation Health Services Regulation Health & Senior Services (mo.gov)	Updated application process . Recreational marijuana use approved by voters November 2022.
Montana	Yes	Yes	Cannabis Control Division - Montana Department of Revenue (mtrevenue.gov)	Marijuana legalization passed on November 3, 2020.
Nebraska	Yes	No	N/A	Medical marijuana use signed into law December 10, 2024. Further implementation to occur.
Nevada	Yes	Yes	Medical Marijuana (nv.gov)	
New Hampshire	Yes	No	Therapeutic Cannabis New Hampshire Department of Health and Human Services (nh.gov)	In 2024, Governor signed into law allowing debilitating conditions to qualify for medical cannabis.
New Jersey	Yes	Yes	Medicinal Cannabis Program Cannabis Regulatory Commission Homepage	Recreational marijuana passed on November 3, 2020. New state laws on cannabis signed on February 22, 2021.
New Mexico	Yes	Yes	Medical Cannabis (nmhealth.org) Cannabis and Hemp Bureau (nm.gov)	Marijuana legalized for adults April 12, 2021. Retail sales began on April 1, 2022.

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

State	Medical Use	Recreational Use	State Marijuana Authority	Additional Notes
New York	Yes	Yes	Office of Cannabis Management (ny.gov)	Recreational marijuana legalized March 31, 2021.
North Carolina	No	No	N/A	Eastern Band of Cherokee Nation has approved medicinal and recreational marijuana use. No for state.
North Dakota	Yes	No	Division of Medical Marijuana Department of Health (nd.gov)	Recreational marijuana use rejected by voters November 2024.
Ohio	Yes	Yes	Ohio Medical Marijuana Control Program	
Oklahoma	Yes	No	Oklahoma Medical Marijuana Authority	Recreational marijuana use initiative on the ballot March 7, 2023 was defeated.
Oregon	Yes	Yes	Marijuana and Hemp (Cannabis): State of Oregon	
Pennsylvania	Yes	No	Medical Marijuana Program (pa.gov)	
Rhode Island	Yes	Yes	Medical Marijuana Information for Patients and Caregivers: Department of Health	Recreational marijuana legalized May 25, 2022. Governor McKee Signs Legislation . Public sales began December 1, 2022.
South Carolina	No	No	N/A	
South Dakota	Yes*	No*	Medical Cannabis in South Dakota (sd.gov)	<p>House Bill 1203 was signed into law March 25, 2021, authorizing banks to engage in business with hemp and marijuana licensees.</p> <p>*Recreational and medical ballot initiatives passed on November 3, 2020. Recreational use was overturned by the South Dakota Supreme Court on November 24, 2021. Recreational marijuana use rejected by voters November 2024.</p>

March 13, 2025

CSBS Marijuana-Related Businesses Job Aid

State/Territory	Medical Use	Recreational Use	State Marijuana Authority	Additional Notes
Tennessee	Yes	No	N/A	CBD oil only, broader medicinal use not approved.
Texas	Yes	No	Compassionate Use Program (texas.gov)	Medical use of CBD oil is allowed.
Utah	Yes	No	Home - Utah Medical Cannabis	
Vermont	Yes	Yes	Cannabis Control Board (vermont.gov)	Recreational marijuana sales started October 1, 2022.
Virginia	Yes	Yes	Cannabis.Virginia.gov	Recreational marijuana was legalized beginning on July 1, 2021.
Washington	Yes	Yes	Welcome to Washington State Liquor and Cannabis Board	
West Virginia	Yes	No	Office of Medical Cannabis (wv.gov)	
Wisconsin	Yes	No	N/A	Medical use of CBD oil is allowed.
Wyoming	No	No	N/A	The short 2024 legislative session includes a bill to decriminalize possession.
Guam	Yes	Yes	Cannabis Control Board Guam Dept. of Revenue and Taxation (guamtax.com)	
Northern Marianas	Yes	Yes	Cannabis CNMI Office of the Governor	Recreational marijuana use law amended August 2019. Public Law 21-05
Puerto Rico	Yes	No		
Virgin Islands	Yes	Yes	US Virgin Islands Office of Cannabis Regulation	Recreational marijuana use approved January 18, 2023. As of January 2025, Programs are not yet in place.

Reference Documents

Document	Description	Link
21 CFR Part 1308	Established marijuana/marihuana [<i>sic</i>] extract as a separate Schedule 1 drug.	www.gpo.gov/fdsys/pkg/FR-2016-12-14/pdf/2016-29941.pdf
Cole Memorandum	The Cole Memo was rescinded on January 4, 2018.	Justice Department Issues Memo on Marijuana Enforcement OPA Department of Justice