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## *Assignment Prompt Sheet*

### **Rohrabacher-Farr Amendment**

#### **Overview**

**Act Title:** Consolidated Appropriations Act of 2015

**Congress:** 114<sup>th</sup> Congress (2015-2016)  
**Session/Sessions:** 1

**Statute No:**  
**Public Law No:** 114 PL 113

**Eid:** 1140113  
**Gid:** 213-007

**Bill:** [HR 2029](#)  
**Sponsor:** Rep. [Charlie Dent](#) (R-PA)  
**House Committees:** Appropriations  
**Senate Committees:** Appropriations

**Companion Bill:**  
**Related Bills:** [HR 2578](#); HR 2685; HR 2577;  
HR 2822; HR 2028; S 754; HR 1560; HR  
1731  
**House Rules:** [Hres 223](#); [Hres 287](#); Hres 303;  
Hres 333; Hres 287; [Hres 566](#)  
**Past Bills:** [113 HR 4660](#)

**Introduced Date- Law Date:** March 10-December 18, 2015  
**House Floor Days:** 5  
**Senate Floor Days:** 3

**Roll Call Votes:** 55



*(Above) Rep. Maurice Hinchey (D-NY), the sponsor of the original Rohrabacher-Farr amendment.*

Source: [New York Times](#).

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## Legislative History Comments

The Rohrabacher-Farr Amendment was enacted as part of the Consolidated Appropriations Act of 2015 (114 PL 113). The amendment barred the Department of Justice using taxpayer funds to prevent states from “implementing their own laws that authorize the use, distribution, possession, or cultivation of medical marijuana ([CRS 2020, 4](#)).” This was the second time it was successfully adopted by Congress.<sup>1</sup> Marijuana legalization supporters asserted the initial passage of the amendment signaled that “Congress [was] officially pulling out of the war on medical marijuana patients and providers ([Vox 2014](#)).” Opponents, like Rep. Andy Harris (R-MD), decried the vote, asserting it “is not medicine” and compared it to a doctor telling someone to “go chew on some mold ([NPR 2014](#)).”

The proposal was first introduced as a floor amendment by Rep. Maurice Hinchey (D-NY) in 2001. While he withdrew the amendment after a brief debate, proposing it as an amendment allowed him to bypass the conservative Judiciary Committee ([Politico 2018](#)).<sup>2</sup> Two years later the amendment was defeated on the floor overwhelmingly, failing 152-273. It would fail seven more times before being adopted in 2015 (see also [CRS 2010](#)). Here’s a Last Week Tonight episode on federal marijuana laws that’s worth a look:

- [https://www.youtube.com/watch?v=BcR\\_Wg42dv8](https://www.youtube.com/watch?v=BcR_Wg42dv8)

From a process standpoint, the Rohrabacher-Farr amendment is a part of the modern appropriations process. Accordingly, this will feel like you’re wading into the middle of a dumpster fire that has been aggressively burning for two decades. But in a fun way! A couple things up front with the process on this bill. First, in order to give you a bit more content specific to Rohrabacher-Farr, I added a process section (#1) on House consideration of HR 4660, the Commerce, Justice, Science, and Related Agencies Appropriations Act of 2014, in the 113<sup>th</sup> Congress. The bill was considered under an open rule. It was the first time the amendment was successfully adopted by Congress (it passed [219-189](#).) The amendment was eventually folded into an omnibus appropriations bill, but you don’t need to worry about that.

House consideration of HR 2029 from April 29-30<sup>th</sup> covers the initial House consideration of the Military Construction, Veterans Affairs, and Related Agencies Appropriations Act for FY 2016. This bill would eventually become the vehicle that was used to pass the Consolidated Appropriations Act of 2015 (with Rohrabacher-Farr attached). It doesn’t have much to do with the amendment and that section isn’t assigned to a student this semester. House Consideration of HR 2578 from June 2-3, 2015, will include debate over the amendment. The amendment passed the House by a wider margin, [242-186](#), than in the previous Congress.

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<sup>1</sup> The first time it was enacted as part of the *Consolidated Appropriations Act of 2014* (113 PL 76, or “Cromnibus”).

<sup>2</sup> Hinchey and cosponsor Dana Rohrabacher (R-CA) had proposed the amendment to H.R. 2500, the Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 2002. After a brief discussion, he withdrew the amendment, stating, “I have determined over the course of the last few days that this House is not ready to vote on this issue at this moment. I wish it were (107th Congress, Congressional Record, July 18, 2001, 13708.)”

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Don't worry about Senate consideration of HR 2029. The last two sections (#3) are focused more on the broader omnibus appropriation bill than Rohrabacher-Farr. Feel free to use language I've provided in there, and mix in some quotes from the debates. The omnibus appropriation bill passed the House in two parts: The House adopted the tax extenders amendment [318-109](#), with three Republicans and 106 Democrats voting no. The omnibus appropriations amendment was then adopted [316-113](#), with 18 Democrats and 95 Republicans in opposition. It passed the Senate [65-33](#).

You won't have access to a CQ Almanac piece for this bill because of how recent it is. But take a look at some of the links provided in this document. And don't hesitate to e-mail me with questions!

## Assignments

For the sections below, you're going to want to answer the questions and write-up the process sections that correspond to your assigned number. Here they are:

#1.

#2.

#3.

#4.

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## Background Questions

1. What happened in previous congresses regarding federal drug policy? In particular, under existing U.S. law, how was marijuana treated (see the [Harrison Act](#) and [Controlled Substances Act](#) here)? Why were some pushing to change this? What kind of reforms were they pushing for? Who was pushing back? There's a nice history discussion in the [New York Times here](#) (as well as other sources listed below).

2. What does Rohrabacher-Farr actually do? Who was pushing for it? What did existing federal policy in this area look like?

Discuss the broader political context this bill was considered in. Who controlled the House? The Senate? By how many? Who was President? Was this part of the President's agenda? What other pieces of legislation were being considered/passed in this Congress?

The Stathis (2014) piece might worth a citation here.

3. What motivated consideration of this legislation in this specific Congress? Was it in response to a specific event? Or was this a slower build over time? What happened in previous congresses regarding this? Had Congress considered comparable legislation? Who was Hinchey? How many times had he pressed for this amendment? How many times had it failed prior to the 113<sup>th</sup> Congress?

With this issue, you might want to detail how public opinion on the issue shifted over time. [Hudak and Stenglein \(2019\)](#) might be worth a look on that point.

4. How does the appropriation process in Congress work? How has it changed over time? Why? How has this differed from its historical consideration? See e.g. [CRS 2016](#); [Hanson \(2015\)](#).

Additionally, what is a reauthorization? Do programs really need to be reauthorized? Why or why not?

**Commented [AJM1]:** In 1969, the U.S. Supreme Court struck down the [Marihuana Tax Act of 1937](#) (75 PL 238) on the grounds that it required individuals to register. The court ruled this violated his Fifth Amendment privilege against self-incrimination (see [Leary v. United States](#)). The [Marihuana Tax Act](#) placed a sizeable tax on the sale of cannabis and passed with minimal debate, but the background is fascinating and fairly relevant today. Specifically, was it motivated by wealthy lobbyists looking to ensure it wasn't used as a cheap substitute for paper? I linked the Wikipedia discussion which highlights that debate.

Under existing federal laws, marijuana possession was punishable by up to 2-10 years in prison. The passage of the Controlled Substances Act as part of the [Comprehensive Drug Abuse Prevention and Control Act of 1970](#) (91 PL 513) reduced that to a misdemeanor punishable by a maximum one-year sentence. As [CQ \(1970\)](#) notes, that measure sought to "provide expanded programs of rehabilitation, treatment and drug abuse education, to unify and revise Federal narcotics laws, to revise the entire penalty structure for violations of those laws and to provide new tools for enforcement." Disputes over marijuana sentencing played a central law in the debate. Ultimately, the law also listed marijuana as a Scheduled I controlled substance.

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## Process Sections

Please write-up the sections that correspond to your number. Feel free to incorporate any notes I might have dumped in the margins.

### *#1. House Consideration of HR 4660 (May 20, May 28-30, 2014)*

[HR 4660](#), the Commerce, Justice, Science, and Related Agencies Appropriations Act of 2014 was sponsored by Rep. Frank Wolf (R-VA). It was originally considered under [Hres 585](#), an open rule. Hres 585 was adopted by voice vote on May 20, 2014.

Debate on HR 4660 commenced on May 28, 2014.

Rohrabacher-Farr passes the House [219-189](#).

HR 4660 is adopted [321-87](#).

### *#4. House Consideration of HR 2029 (April 29-30, 2015)*

HR 2029, the Military Construction, Veterans Affairs, and Related Agencies Appropriations Act for FY 2016 was sponsored by Rep. Charlie Dent (R-PA). The measure was originally considered under [Hres 223](#), a modified open rule.<sup>3</sup> During consideration of Hres 223, Rep. Rob Woodall (R-GA) argued for the rule and detailed the benefits of using a modified-open approach:

Mr. Speaker, you have heard it said often that the Senate only has two rules: the unanimous consent and exhaustion. The Committee on Rules prevents us from having to have that structure here, but it is true that you can effectively filibuster in this Chamber as well: you can come down; you can move to strike the last word; you can have debate go on forever. I don't believe that serves us particularly well (*Congressional Record*, 114<sup>th</sup> Congress, April 29, 2015, H2507).

The previous question on Hres 223 was adopted by voice vote and the rule adopted [240-186](#).

After dispensing with 43 amendments and taking ten roll call votes, HR 2029 passed the House [255-163](#).

### *#2. House Consideration of HR 2578 (June 2-3, 2015)*

[HR 2578](#), the Commerce, Justice, Science, and Related Agencies Appropriations Act of 2015 was sponsored by Rep. John Culberson (R-TX).

**Commented [AJM2]:** HR 4660 stalled in the Senate. However, Rohrabacher-Farr was eventually added to [HR 83](#), the Consolidated Appropriations Act of 2015 (113 PL 235, or "Cromnibus").

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<sup>3</sup> Hres 223 also provided for consideration of HR 2028, the Energy, Water Development and Related Agencies Appropriations Act for FY 2016.

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HR 2578 was originally considered under Hres 287, a modified-open rule.<sup>4</sup> The Rules Committee Chairman, Rep. Pete Sessions (R-TX) asserted the rule reflected “the majority’s commitment to an open and transparent appropriations process (*Congressional Record*, 114<sup>th</sup> Congress, June 2, 2015, H3653).” Democrats were largely critical of the underlying appropriation bills. For example, Rep. Alcee Hastings (D-FL) called the appropriation bills “woefully inadequate and underfunded pieces of legislation that serve as a slap in the face to hard-working Americans and a reminder of my Republican colleagues’ shortsighted and irresponsible attempt at achieving a balanced budget (*Congressional Record*, 114<sup>th</sup> Congress, June 2, 2015, H3654).”

The previous question motion on Hres 287 was adopted by voice vote and the rule passed [242-180](#) with three Democrats voting yes.

Rohrabacher-Farr passed the House by a wider margin, [242-186](#). Democrats broke 175-10 in favor and Republicans 67-176 against.

HR 2578 would pass the chamber [242-183](#).

**Commented [AJM3]:** This measure is not considered in the Senate.

#### ***#4. Senate Consideration of HR 2029 (October 1, November 10-11, 2015)***

President Barack Obama (D-IL) threatened to veto HR 2029 due to a number of provisions in the bill, including concerns it would not fund veterans’ health programs and an amendment which barred the White House from “using a Pentagon war fund to pay for military construction projects.”<sup>5</sup> An attempt by Republicans to proceed to consider the bill was blocked by Senate Democrats. A cloture vote on the motion to proceed was then rejected [50-44](#) on October 1, 2015.

Just over a month later, Senate Majority Leader Mitch McConnell (R-KY) offered a motion to proceed to HR 2029. This was agreed to 93-0 on November 5, 2015. HR 2029 was debated and amendments were dispensed with on November 9<sup>th</sup> and 10<sup>th</sup>. The bill would eventually pass on November 10, 2015 by a vote of 93-0. President Obama indicated a willingness to sign the measure “despite provisions that will make it extremely difficult for him to fulfill his promise of closing the terrorist detention center at Guantánamo Bay, Cuba.”<sup>6</sup>

#### ***#3. House Consideration of the Senate Amendments to HR 2029 (December 17, 2015)***

Congressional inaction on appropriation bills necessitated they enact a continuing resolution to keep the government funded. Accordingly, both chambers passed HR 719 (114 PL 53), which the President signed into law on September 30<sup>th</sup>. The continuing resolution funded the government through December 11, 2015. Two additional short-term continuing resolutions were then adopted while the White House and Congress negotiated a broader agreement. HR 2250

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<sup>4</sup> Hres 287 also provided for consideration of HR 2577, the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act for FY 2016.

<sup>5</sup> Marcos, Christina. 2015. “House Approves First ’16 Spending Bill.” *The Hill*, April 30.

<https://thehill.com/blogs/floor-action/house/240738-house-approves-first-16-spending-bill>

<sup>6</sup> Herszenhorn, David. 2015. “Senate Passes Military Bill That Bans Transfers of Guantánamo Detainees.” *The New York Times*, November 10. <https://www.nytimes.com/2015/11/11/us/politics/senate-passes-military-bill-that-bars-transfers-of-guantanamo-detainees.html>

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(114 PL 96) was adopted on December 11, 2015, funding the government through December 16<sup>th</sup>. And HJR 78 (114 PL 100) was signed into law on December 16<sup>th</sup> and funded the government through December 22, 2015.

On December 15<sup>th</sup>, Republicans and Democrats announced they had reached an agreement on a \$1.1 trillion dollar spending bill that would fund the government for a year. The measure included extending a large number of tax breaks largely sought by congressional Republicans. The House opted to use HR 2029 as a vehicle for the measure. The final measure would eventually include all twelve regular appropriation bills and fund the government through September 30, [2016](#).

**Commented [AJM4]:** <https://crsreports.congress.gov/AppropriationsStatusTable?id=2016>

On December 17, 2015, Rep. Tom Cole (R-OK) called up Hres 566. The resolution would make it in order to concur in the Senate Amendments to HR 2029 with two House amendments. The first of these contained the text of the omnibus funding bill. The second amendment included language extending the tax cuts. Cole called the bill “a compromise and a reflection of divided government,” noting that “it you can’t find something you don’t agree with in the bill, you must not be looking hard enough (*Congressional Record*, 114<sup>th</sup> Congress, December 17, 2015, H9380).”

Democrats expressed tepid support for the deal, but opposed a number of provisions. As Rep. Jim McGovern (D-MA) put it: “We have a deal before us that, if passed, would prevent us from heading toward a government shutdown and damaging our economy. Americans cannot afford another manufactured crisis, something that my friends on the other side of the aisle have become good at (*Congressional Record*, 114<sup>th</sup> Congress, December 17, 2015, H9381).” The previous question motion on Hres 566 was ordered by a 244-177 vote. The rule was then adopted [240-185](#).

**Commented [AJM5]:** This is a bit confusing. Four House votes here:

- #1. Ordering the PQ on the rule, Hres 566.
- #2. Adopting Hres 566.
- #3. Adopting the tax extension amendments offered by the Senate. (3b)
- #4. Adopting the omnibus appropriation bill. (3a)

You want the reader to understand the differences between 3a and 3b. Breaking up the votes in this way allowed Democrats to vote against the extension of the tax cuts and Republicans to vote against the spending provisions in the appropriations bill.

The House adopted the tax extenders amendment [318-109](#), with three Republicans and 106 Democrats voting no. The omnibus appropriations amendment was then adopted [316-113](#), with 18 Democrats and 95 Republicans in opposition.

### ***#3. Senate Consideration of the House Amendments to the Senate Amendments to HR 2029 (December 18, 2015)***

On December 18, 2015, McConnell moved to concur in the House Amendments to the Senate Amendments to HR 2029.

Cloture on the motion to occur was adopted 72-26.

The motion was agreed to [65-33](#). Six Democrats joined 26 Republicans in opposition.

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## Member Spotlight

Choose one of the following for your member spotlight:

#1. Rep. Maurice Hinchey (D-NY); Rep. Frank Wolf (R-VA); Rep. Andy Harris (R-MD); Rep. Tom Massie (R-KY); Rep. Barbara Lee (D-CA); Sen. Cory Booker (D-NJ)

#2. Rep. Dana Rohrabacher (R-CA); Rep. Pete Sessions (R-TX); Rep. Alcee Hastings (D-FL); Rep. Andy Barr (R-KY); Rep. Earl Blumenauer (D-OR); Rep. Dina Titus (D-NV)

#3. Rep. Rob Woodall (R-GA); Sen. Richard Burr (R-NC); Rep. Sam Farr (D-CA); Rep. Charlie Dent (R-PA); Rep. Tom Cole (R-OK); Sen. Rand Paul (R-KY)

#4. Rep. Jim McGovern (D-MA); Sen. Patrick Leahy (D-VT); Sen. Jeff Sessions (R-AL); Rep. Chaka Fattah (D-PA); Rep. John Culberson (R-TX); Rep. John Fleming (R-LA)

**Commented [AJM6]:** <https://www.nytimes.com/2017/11/23/obituaries/maurice-hinchey-dies.html>

**Commented [AJM7]:** <https://www.washingtonpost.com/nation/2021/01/07/congress-fistfight/>

**Commented [AJM8]:** [https://www.washingtonpost.com/politics/dana-rohrabacher-a-pro-russia-republican-narrowly-loses-house-seat/2018/11/10/97b12136-e44a-11e8-8f5f-a55347f48762\\_story.html](https://www.washingtonpost.com/politics/dana-rohrabacher-a-pro-russia-republican-narrowly-loses-house-seat/2018/11/10/97b12136-e44a-11e8-8f5f-a55347f48762_story.html)

**Commented [AJM9]:** <https://www.politico.com/story/2019/02/07/rob-woodall-retiring-1156866>

**Commented [AJM10]:** <https://www.politico.com/magazine/story/2017/07/28/charlie-dent-profile-moderates-trump-tuesday-group-215417/>

## Aftermath Questions

1. How was this act viewed upon passage? What did the newspapers say? How did the final measure differ from the one reformers were pushing?

How has this been viewed by scholars? Do they highlight any major limitations?

2. How has this law evolved over time? Has it been featured in any major Supreme Court cases? Significantly altered by subsequent legislation? How often has the amendment been added to subsequent appropriation bills?
3. In addition to Rohrabacher-Far, what else was included in this Omnibus Appropriation bill? Who came out ahead? The President or Republicans in Congress? How has the appropriation process evolved since then? What are the reasons for omnibus lawmaking? What do scholars say? See e.g. [Reynolds 2015](#).
4. How relevant is this law currently? Are there additional issues related to it that reformers have been pushing to change? Also, address other developments in the law as they relate to marijuana policy.

You might want to tie-in the relevance of the recent opioid crisis here. CRS might be helpful here:

<https://fas.org/sgp/crs/misc/R44782.pdf>

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## Suggested Sources

### *Scholarly Articles:*

Galston, William A., and E. J. Dionne Jr. "The new politics of marijuana legalization: Why opinion is changing." *Governance Studies at Brookings* (2013): 1-17.

Eddy, Mark. 2010. "Medical Marijuana: Review and Analysis of Federal and State Policies." *CRS Report: RL33211*, April 2.

Courtwright, David T. "The Controlled Substances Act: How a "big tent" reform became a punitive drug law." *Drug and Alcohol Dependence* 76.1 (2004): 9-15.

Erikson, Robert S., Gerald C. Wright, and John P. McIver. "Political parties, public opinion, and state policy in the United States." *American Political Science Review* 83.3 (1989): 729-750.

Hodroff, Matthew B. "The Controlled Substances Act: Time to Reevaluate Marijuana." *Whittier L. Rev.* 36 (2014): 117.

Kim, Gook Jin. "Examining the predictors of medical marijuana legalization in the United States using an empirically based taxonomy approach." *Policy Studies* (2019): 1-20.

Hudak, John. *Marijuana: a short history*. Brookings Institution Press, 2016.

Mikos, Robert A. "Preemption under the controlled substances act." *J. Health Care L. & Pol'y* 16 (2013): 5.

Kreit, Alex. "Controlled substances, uncontrolled law." *Alb. Gov't L. Rev.* 6 (2013): 332.

CRS 2019. "The Controlled Substances Act (CSA): A Legal Overview for the 116<sup>th</sup> Congress." Congressional Research Service. <https://fas.org/sgp/crs/misc/R45948.pdf>

### *Newspaper Pieces:*

- <https://www.vox.com/2014/9/25/6842187/drug-schedule-list-marijuana>
- <https://time.com/4298038/marijuana-history-in-america/>
- <https://www.vox.com/2014/8/1/5954993/war-on-drugs-marijuana-legalization-US-drug-policy-absurd>
- <https://www.washingtonpost.com/news/wonk/wp/2016/04/06/the-dea-will-decide-whether-to-change-course-on-marijuana-by-july/>
- <https://www.theatlantic.com/national/archive/2011/07/marijuana-medical-use/352664/>
- <https://archive.nytimes.com/www.nytimes.com/interactive/2013/10/27/us/marijuana-legalization-timeline.html>
- <https://www.vox.com/2016/5/8/18089368/war-on-drugs-marijuana-cocaine-heroin-meth>
- <https://www.theatlantic.com/health/archive/2012/03/the-war-on-drugs-how-president-nixon-tied-addiction-to-crime/254319/>

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- <https://www.rollcall.com/2015/12/16/omnibus-spending-bill-lands-at-last-with-oil-export-ban-lifted/>
- <https://www.nytimes.com/2015/12/16/us/politics/congress-9-11-emergency-workers-zadroga-act.html>
- <https://www.washingtonpost.com/news/powerpost/wp/2015/12/18/house-to-vote-on-spending-bill-that-would-avert-shutdown/>
- <https://www.nytimes.com/2017/11/23/obituaries/maurice-hinchey-dies.html>
- <https://www.washingtonpost.com/nation/2021/01/07/congress-fistfight/>
- [https://www.washingtonpost.com/politics/dana-rohrabacher-a-pro-russia-republican-narrowly-loses-house-seat/2018/11/10/97b12136-e44a-11e8-8f5f-a55347f48762\\_story.html](https://www.washingtonpost.com/politics/dana-rohrabacher-a-pro-russia-republican-narrowly-loses-house-seat/2018/11/10/97b12136-e44a-11e8-8f5f-a55347f48762_story.html)
- <https://www.politico.com/story/2019/02/07/rob-woodall-retiring-1156866>
- <https://www.politico.com/magazine/story/2017/07/28/charlie-dent-profile-moderates-trump-tuesday-group-215417/>
- <https://www.pewresearch.org/fact-tank/2019/11/14/americans-support-marijuana-legalization/>
- <https://www.brookings.edu/research/restoring-regular-order-in-congressional-appropriations/>
- <https://sgp.fas.org/crs/misc/R42388.pdf>
- <https://www.brookings.edu/blog/fixgov/2015/12/18/grading-ryans-first-omnibus/>
- <https://www.brookings.edu/research/the-fiscal-fights-of-the-obama-administration/>
- <https://www.vox.com/2014/12/13/7385253/what-is-cromnibus>
- <https://www.vox.com/2015/12/16/10315018/the-big-new-budget-deal-explained>
- <https://www.vox.com/polyarchy/2015/12/3/9844276/mcconnell-omnibus-campaign-finance-rider>
- <https://www.vox.com/2015/12/16/11621526/congress-slips-surveillance-bill-into-must-pass-budget-measure>
- <https://www.npr.org/sections/thetwo-way/2015/12/18/460281572/congress-sends-1-8-trillion-tax-and-spending-bill-to-president-obama>
- <https://www.washingtonpost.com/news/powerpost/wp/2015/12/16/heres-what-made-it-into-congresss-big-tax-and-spending-bills/>
- <https://www.washingtonpost.com/news/powerpost/wp/2015/12/07/pressure-mounts-for-a-year-end-spending-deal/>
- <https://sgp.fas.org/crs/misc/R46841.pdf>
- <https://www.politico.com/magazine/story/2018/03/21/washingtons-most-powerful-anti-pot-official-is-named-sessions-its-not-who-you-think-217662/>
- <https://www.npr.org/sections/itsallpolitics/2014/05/30/317427925/gop-house-votes-to-leave-states-alone-on-medical-marijuana>
- <https://www.vox.com/2014/5/30/5763654/the-house-just-voted-to-protect-medical-marijuana-patients-from>
- <https://www.vox.com/2014/12/10/7368693/marijuana-legalization-congress-budget>
- <https://sgp.fas.org/crs/misc/R46841.pdf>
- <https://crsreports.congress.gov/AppropriationsStatusTable?id=2016>
- <https://www.washingtonpost.com/news/wonk/wp/2014/12/09/two-thirds-of-americans-want-congress-to-grant-states-a-safe-haven-from-federal-marijuana-enforcement/>

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- <https://sgp.fas.org/crs/misc/LSB10482.pdf>
- <https://www.nytimes.com/2015/10/01/us/politics/government-shutdown-congress.html>