

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CANNABIS REGULATORY AGENCY

In the Matter of

Prism Triangle LLC  
License No.: AU-SC-000124

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ENF No.: 26-00152

FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) by and through its attorneys, Assistant Attorneys General Adam M. Leyton and Maryann Hong, files this formal complaint against Prism Triangle LLC (Respondent), alleging upon information and belief as follows:

1. The CRA is authorized under the Michigan Regulation and Taxation of Marihuana Act (MRTMA), MCL 333.27951 *et seq.*, to investigate alleged violations of the MRTMA and administrative rules promulgated thereunder, take disciplinary action to prevent such violations, and impose fines and other sanctions against applicants and licensees that violate the MRTMA or administrative rules.

FACTUAL ALLEGATIONS

2. Respondent holds an active state license under the MRTMA to operate an adult-use marijuana safety compliance facility in the State of Michigan.

3. Respondent was licensed to operate at 850 Ladd Rd., Bldg. B, Walled Lake, MI 48390, at all times relevant to this complaint.

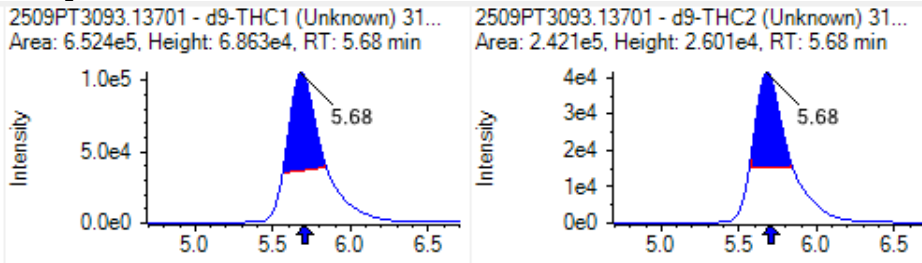
4. Following an investigation, the CRA determined that Respondent violated the MRTMA and/or administrative rules promulgated thereunder as set forth below.

5. In October 2025, the CRA received information questioning the validity of Respondent's test results related to potency for three samples of infused pre-rolls identified in Metrc with sample tags 1A4050300017E6D000049211 (sample -049211), 1A4050300017E6D000049212 (sample -049212), and 1A4050300017E6D000049213 (sample -049213).

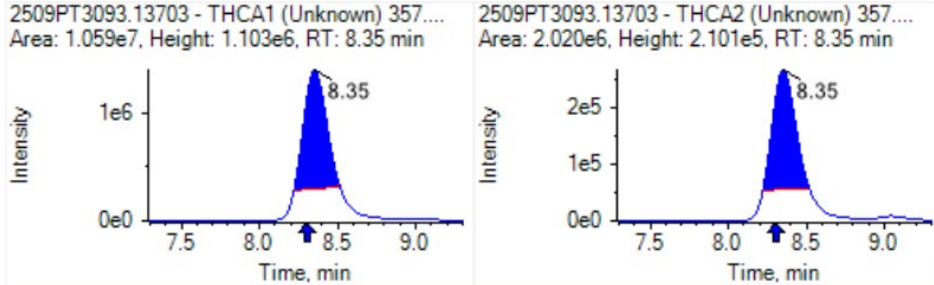
6. CRA staff initiated a potency audit. During this process, the CRA asked Respondent and another licensed safety compliance facility (lab) that previously tested samples from the same batches of infused pre-rolls to re-test their samples. The CRA also asked Respondent and the other lab to exchange their samples and test each other's for potency. Following the audit, the CRA found noticeable discrepancies in THC content between the results reported by Respondent and the other lab.

7. CRA staff visited Respondent's business on November 7, 2025. While onsite, CRA staff reviewed the chromatograms for samples -049211, -049212, and -049213. As shown in the below charts, Respondent engaged in "peak shaving" by removing area from under the peak when reporting the delta-9 THC results for sample -049211 and the THCA results for sample -049213.

Sample -049211



Sample -049213



8. Respondent's use of peak shaving as shown above yielded inaccurate and unreliable test results for delta-9 THC in sample -049211 and THCA in sample -049213.

9. On November 10, 2025, CRA staff requested the standard operating procedure (SOP) Respondent operated under when testing samples -049211, -049212, and -049213. CRA staff also requested the raw data associated with the testing.

10. Based on the review of the data, the SOP, and as confirmed by Respondent during an interview with Respondent's staff on January 20, 2026, Respondent failed to follow its CRA-approved SOP for potency testing by, for example:

- a. Failing to use internal standards; and

- b. Reporting test results for analytes that fell below the limit of quantitation established during Respondent's method validation.

11. Accordingly, Respondent obtained the potency results for samples -049211, -049212, and -049213 using a testing method that had not been validated for cannabis testing by an independent third party and had not been approved by the CRA.

#### COUNT 1

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.107(4)(f)(i), which relevantly states that a laboratory shall retain and employ at least one laboratory manager with a relevant advanced degree in a medical or laboratory science, and that the laboratory manager is responsible for duties including, but not limited to ensuring tests are conducted in accordance with Rule 420.305.

#### COUNT 2

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.107(4)(f)(ii), which relevantly states that a laboratory shall retain and employ at least one laboratory manager with a relevant advanced degree in a medical or laboratory science, and that the laboratory manager is responsible for duties including, but not limited to ensuring test results are accurate and valid.

#### COUNT 3

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.305(2), which relevantly states that a laboratory shall use analytical testing methodologies that are based upon published peer-reviewed methods, have been validated for cannabis testing by an independent third party, and have been internally verified by the licensed laboratory according to Appendix J or K of Official Methods of Analysis authored by the Association of Official Analytical Collaboration (AOAC) International, with guidance from published cannabis standard method performance requirements where available.

COUNT 4

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.305b(8), which relevantly states that a laboratory's standard operating procedures for sampling and testing of marijuana and marijuana products shall be approved by the agency prior to the performance of any safety tests.

THEREFORE, based on the above, the CRA gives notice of its intent to impose fines and/or other sanctions against Respondent's license, which may include suspension, revocation, restriction, and/or refusal to renew Respondent's license.

Under MCL 333.27957(1)(c) and Rule 420.704(2), any party aggrieved by an action of the CRA suspending, revoking, restricting, or refusing to renew a license, or imposing a fine, shall be given a hearing upon request. A request for a hearing must be submitted to the CRA in writing within 21 days after service of this complaint. Notice served by certified mail is considered complete on the business day following the date of the mailing.

Respondent also has the right to request a compliance conference under Rule 420.704(1) and Rule 420.808(4). A compliance conference is an informal meeting at which Respondent has the opportunity to discuss the allegations in this complaint and demonstrate compliance under the MRTMA and/or the administrative rules.

Hearing and compliance conference requests must be submitted in writing by one of the following methods, with a copy provided to the assistant attorneys general named below:

By Mail:           Department of Licensing & Regulatory Affairs  
                          Cannabis Regulatory Agency  
                          P.O. Box 30205  
                          Lansing, Michigan 48909

In Person: Department of Licensing & Regulatory Affairs  
Cannabis Regulatory Agency  
2407 North Grand River  
Lansing, Michigan 48906

By Email: [CRA-LegalHearings@michigan.gov](mailto:CRA-LegalHearings@michigan.gov)

If Respondent fails to timely respond to this formal complaint, a contested case hearing will be scheduled to resolve this matter.

Questions about this complaint should be directed to the undersigned assistant attorneys general.

Respectfully submitted,

*/s/Adam M. Leyton*

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Dated: April 7, 2026

LF: 2026-0449499-A / Prism-Triangle, LLC AU-SC-000124 ENF 26-00152 / Formal Complaint / 2026-04-07