

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

In the Matter of

**KTQT, LLC
License No.: GR-C-000865**

ENF No.: 25-01073

FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) by and through its attorney, Assistant Attorney General Adam M. Leyton, files this formal complaint against KTQT, LLC (Respondent), alleging upon information and belief as follows:

1. The CRA is authorized under the Medical Marihuana Facilities Licensing Act (MMFLA), MCL 333.27101 *et seq.*, to investigate alleged violations of the MMFLA 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 MMFLA or administrative rules.
2. Section 402(12) of the MMFLA provides that the expiration of a license does not terminate the CRA's authority to impose sanctions on the license.

FACTUAL ALLEGATIONS

3. Respondent held an active state operating license under the MMFLA to operate a medical marijuana class C grower facility in the state of Michigan.
4. Respondent operated at 8799 Pulaski Rd., Concord, MI 49237, at all times relevant to this complaint.

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

6. On April 2, 2025, the CRA's executive director approved a consent order and stipulation between Respondent and the CRA. The consent order and stipulation resolved CRA Renewal Record GRR-C-23-001182 and set forth conditions that Respondent needed to fulfill before its license could be renewed. If Respondent failed to perform these conditions within the time specified, the consent order and stipulation explained that Respondent's license "shall be deemed expired and will be closed."

7. Respondent failed to timely meet the conditions of the April 2, 2025 consent order and stipulation and the license accordingly expired on August 14, 2025. Thereafter, the CRA notified Respondent that Respondent's license expired, that Respondent could not transfer its remaining marijuana inventory to another licensed business, and that Respondent should contact the CRA to assist in compliantly reconciling its inventory.

8. On September 11 and/or September 12, 2025, Respondent transferred all of its remaining marijuana inventory from the expired medical marijuana class C license in the statewide monitoring system, Metrc. Metrc reflected a transfer of 1,500 "immature plants" from Respondent's expired medical license to a licensed, co-located adult-use marijuana class C grower establishment.

9. On September 15, 2025, CRA staff performed an on-site inspection at Respondent's expired medical marijuana facility and the co-located adult-use marijuana establishment. CRA staff observed a total of 3,500 growing plants approximately four to six feet tall on the premises. Of these, 2,000 plants had adult-use marijuana Metrc tags affixed, while the remaining 1,500 plants had medical marijuana Metrc tags affixed. CRA staff did not observe any immature plants on the premises.

COUNT 1

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.108(8), which relevantly states that a grower shall accurately enter all transactions, current inventory, and other information into the statewide monitoring system as required in the MMFLA, the rules, and the Marijuana Tracking Act.

COUNT 2

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.212(1), which relevantly states that all marijuana products must be identified and tracked consistently in the statewide monitoring system.

COUNT 3

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.806(4), which relevantly states that a person operating without a marijuana license shall cease operations and may be subject to sanctions.

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 the suspension, revocation, restriction, and/or refusal to renew Respondent's license.

Under MCL 333.27407(4) 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 MMFLA 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 attorney 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

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 attorney general.

Respectfully submitted,

/s/Adam M. Leyton

Adam M. Leyton (P80646)
Assistant Attorney General
Attorney for Cannabis Regulatory
Agency
Licensing and Regulation Division
525 West Ottawa Street
P.O. Box 30758
Lansing, Michigan 48909
Telephone: (517) 335-7569
Fax: (517) 241-1997

Dated: January 27, 2026

LF: 2025-0443749-A / KTQT LLC GR-C-000865 ENF 25-01073 / Med Complaint / 2026-01-21



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

In the Matter of

License Name: KTQT, LLC
License No.: GR-C-000865

ENF No.: 25-01073

_____ /

PROOF OF SERVICE

I hereby certify that on _____, I provided a copy of the
Formal Complaint dated _____ in the above captioned case
by personal service to:

Cannabis Regulatory Agency
Department of Licensing & Regulatory
Affairs

CANNABIS REGULATORY AGENCY
2407 NORTH GRAND RIVER • P.O. BOX 30205 • LANSING, MICHIGAN 48909
www.michigan.gov/cra

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