

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

In the Matter of

KTQT, LLC
License No. AU-G-C-000683

ENF No.: 25-01074

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 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 class C grower business in the state of Michigan.

3. Respondent operated at 8799 Pulaski Rd., Concord, MI 49237, 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. On September 11 and/or September 12, 2025, Respondent accepted a transfer of 1,500 “immature plants” in the statewide monitoring system, Metrc, from its expired, co-located medical marijuana class C grower license.

6. Prior to accepting the transfer, Respondent’s Metrc inventory reflected 2,000 marijuana plants, from which Respondent created five harvest batches totaling 1,513 plants. Thus, at the time of transfer, Respondent’s Metrc inventory reflected only 487 mature, growing plants.

7. On September 15, 2025, CRA staff performed an on-site inspection at Respondent’s adult-use marijuana establishment and expired, co-located medical marijuana facility. CRA staff observed a total of 3,500 growing plants approximately four to six feet tall on the premises. Of those, 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.

8. Respondent’s manager admitted that Respondent had not physically harvested any plants, and that Respondent’s Metrc information reflecting 1,513 harvested plants was incorrect.

COUNT 1

Respondent’s actions as described above demonstrate a violation of Mich Admin Code, R 420.102(1)(c), which relevantly states that a class C marijuana

grower license authorizes the marijuana grower to cultivate not more than 2,000 marijuana plants.

COUNT 2

Respondent's actions as described above demonstrate a violation of Mich Admin Code, R 420.102(7), which relevantly states that a marijuana grower must accurately enter all transactions, current inventory, and other information into the statewide monitoring system as required in the rules.

COUNT 3

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.

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 333.27957(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 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: 2025-0443751-A / KTQT LLC AU-G-C-000683 ENF 25-007074 / draft 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.: AU-G-C-000683

ENF No.: 25-01074

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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