

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

In the Matter of

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

ENF Nos.: 25-01072 and 25-01151

 /

FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) by and through its attorney, Assistant Attorney General Adam M. Leyton, 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.

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5. In March 2025, Respondent performed safety compliance testing on a batch of marijuana vape carts identified in the statewide monitoring system (Metr) with package tag 1A40503000213A6000201027 (package -201027). Respondent's certificate of analysis for the associated sample, identified in Metrc with sample tag 1A40503000213A6000193045 (sample -193045), showed passing test results for chemical residues and all other required tests. Based on Respondent's test results for sample -193045, marijuana from package -201027 was transferred to retailers and made available for public sale.

6. Thereafter, the CRA received information questioning the validity of Respondent's test results related to chemical residues detected in sample -193045.

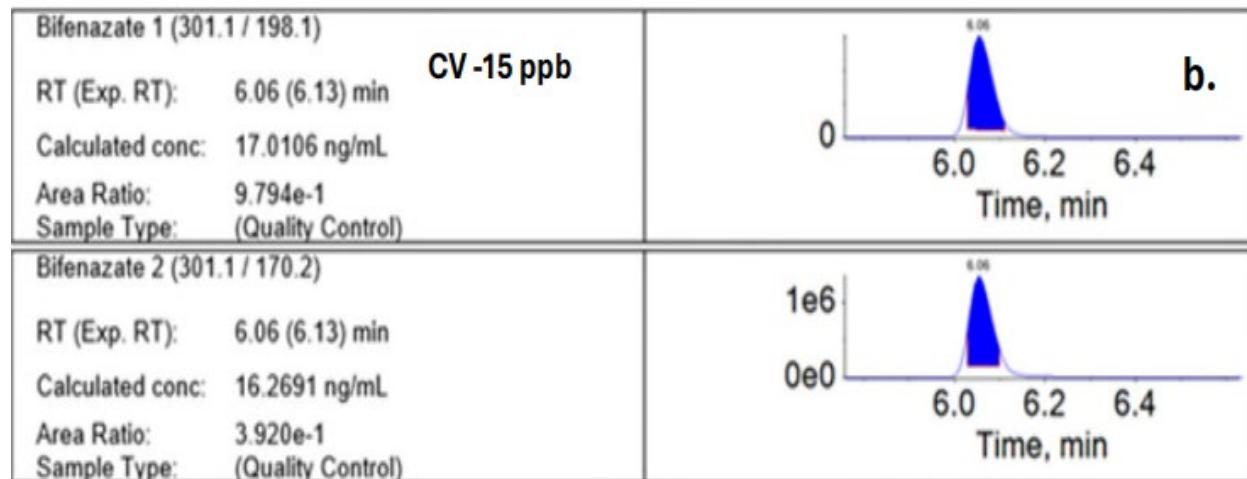
7. CRA staff initiated an investigation into Respondent's testing procedures. CRA staff requested the sample prep sheets used by Respondent during the testing of sample -193045. Review of the sample prep sheets revealed that Respondent deviated from its CRA-approved standard operating procedure (SOP) for pesticide sample preparation by, for example:

- a. Failing to record reagent lots for Pesticides-calibration-10 ppm working solution, Pesticides-verification-10 ppm working solution, Pesticides-ISTD-3 ppm working solution, and acetonitrile
- b. Failing to record pipettes used

c. Using a sample prep sheet that did not match the CRA-approved sample prep sheet

8. The CRA reviewed data reports associated with Respondent's testing of sample -193045, including the calibration verification chromatograms for bifenazate, bifenthrin, chlorfenapyr, myclobutanil, paclobutrazol, and trifloxystrobin at 15 parts per billion (ppb). The data reports revealed that Respondent performed "peak shaving" on the chromatograms while testing the quality control samples.

9. By way of example, the below chart shows Respondent's integration of the peak used during the quality control test for bifenazate using a calibration verification of 15 ppb. Respondent manually integrated the peak on the quality control sample to remove or "shave off" part of the area under the peak.



10. Respondent's manual integration of the peak as shown above allowed the testing instrument to reflect proper calibration for bifenazate testing despite Respondent's failure to properly calibrate the instrument. Thus, Respondent

performed the subsequent test for bifenazate in sample -193045 without properly calibrating the instrument, which yielded inaccurate and unreliable test results.

11. During an interview with CRA staff on October 30, 2025, Respondent's lab technician, AG, confirmed that Respondent manually integrated the peak used to verify the calibration for bifenazate tests.

12. Based on review of the data sheets, and as confirmed by Respondent during the October 30, 2025 interview with CRA staff, Respondent deviated from its CRA-approved SOP for pesticide data review by, for example:

- a. Unnecessarily integrating the quality control sample peaks while calibrating the instrument
- b. Failing to adhere to the "Pesticide Guidebook" (*Quantitation of Pesticide Residues and Cannabinoids in Cannabis Matrices*) reference method when manually integrating the peaks

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.

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13. On August 20, 2025, the CRA received information questioning the validity of Respondent's microbial test results for packages 1A405030000CF6D000000310, 1A405030003A022000069361, 1A4050300016E06000038361, 1A4050300022B79000056344, 1A4050300022B79000056347, 1A40503000213A6000192473 and 1A40503000381A9000001394.

14. CRA staff requested the SOP Respondent used to test the samples associated with the above-referenced packages. Review of the provided SOP revealed that Respondent failed to follow its CRA-approved SOP for aspergillus testing.

15. The CRA-approved SOP stated that Respondent will obtain aspergillus test results using a combined qualitative method. However, Respondent obtained the aspergillus test results for the above-referenced packages using a plating

method that had not been validated for cannabis testing by an independent third party and had not been approved by the CRA.

16. During an interview with CRA staff on October 30, 2025, Respondent's lab manager, BJJ, admitted to using the unapproved plating method while testing the above-referenced packages.

COUNT 5

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 6

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 7

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 8

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 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: 2025-0446374-A / Prism-Triangle, LLC AU-SC-000124 ENF 25-011151 / Formal Complaint / 2026-01-26



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

In the Matter of

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

ENF No.: 25-01072 and
25-01151

/

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