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

In the Matter of

Saeed Bazzi Properties, LLC dba Apollo Cannabis Company
License No. PC-000569
_____/

ENF No. 22-00561

CONSENT ORDER AND STIPULATION

CONSENT ORDER

On March 20, 2023, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the medical marijuana provisioning center license (no. PC-000569) of Saeed Bazzi Properties, LLC dba Apollo Cannabis Company (Respondent) under the Medical Marihuana Facilities Licensing Act (MMFLA), MCL 333.27101 *et seq.*, and administrative rules promulgated thereunder. The complaint alleged Respondent violated Mich Admin Code, R 420.209(11), R 420.209(13), R 420.602(1), R 420.602(2)(b), and R 420.602(2)(c).

The executive director or designee reviewed the stipulation contained in this document and agrees the public interest is best served by resolution of the complaint. Therefore, the executive director or designee finds that the allegations contained in the complaint are true and that Respondent violated Mich Admin Code, R 420.209(11), R 420.209(13), R 420.602(1), R 420.602(2)(b), and R 420.602(2)(c).

Accordingly, for these violations, IT IS ORDERED:

1. Respondent must pay a fine in the amount of thirteen thousand and 00/100 dollars ($13,000.00). This fine shall be paid within 30 days of the effective date of this order by check, money order, or online through Accela Citizen Access (ACA). CRA guidance on how to make compliance payments online is available under "Tips for Licensees" at www.michigan.gov/cra/bulletins. Checks or money orders shall be made payable to the State of Michigan with "ENF No. 22-00561" and "License No. PC-000569" clearly displayed on the check or money order and mailed to: Department of Licensing and Regulatory Affairs, Cannabis Regulatory Agency, P.O. Box 30205, Lansing, Michigan 48909.

2. Unless otherwise specified in this order, Respondent shall direct any communications to the CRA that are required by the terms of this order to CRA-CSS@michigan.gov.

3. Respondent shall be responsible for all costs and expenses incurred in complying with the terms and conditions of this consent order.

4. If Respondent violates any term or condition set forth in this order, Respondent may be subject to additional fines and/or other sanctions.

This order shall be effective 30 days after the date signed by the CRA's executive director or designee, as set forth below.

CANNABIS REGULATORY AGENCY

Signed on: 5/12/2025

By: Brian Hanna
Digitally signed by: Brian Hanna
DN: CN = Brian Hanna email = hannab@michigan.gov C = US O = CRA OU = CRA
Date: 2025.05.12 14:47:24 -04'00'

Executive Director Brian Hanna
or Designee
Cannabis Regulatory Agency

STIPULATION

The parties stipulate to the following:

1. The facts alleged in the formal complaint are true and constitute a violation of the administrative rules promulgated under the MMFLA.

2. Respondent understands and intends that by signing this stipulation, Respondent is waiving the right under the MMFLA, administrative rules promulgated thereunder, and the Administrative Procedures Act of 1969, MCL 24.201 *et seq.*, to require the CRA to prove the charges set forth in the complaint by presentation of evidence and legal authority and to present a defense to the charges.

3. The parties considered the following in reaching this agreement:

   a. The business is no longer in operation and the license was closed on August 6, 2024.

   b. Respondent was cooperative and wishes to resolve the allegations without the need for and expense of an administrative hearing.

4. The CRA's operations director or designee must approve this proposed agreement before it is forwarded to the CRA's executive director or designee for review and issuance of the above consent order. The parties reserve the right to proceed to an administrative hearing without prejudice to either party, should the CRA's operations director, executive director, or designees reject the proposed consent order.

By signing this stipulation, the parties confirm that they have read, understand, and agree with the terms of the consent order.

AGREED TO BY:

Alyssa A. Grissom Digitally signed by Alyssa A. Grissom Date: 2025.05.09 10:26:12 -04'00'

Desmond Mitchell
Operations Director
or Designee
Cannabis Regulatory Agency

Dated: 5/9/2025

/s/Sarah E. Huyser

Sarah E. Huyser (P70500)
Assistant Attorney General
Attorney for Cannabis Regulatory Agency
Dated: *May 8, 2025*

AGREED TO BY:

Saeed Bazzi
Authorized Representative
On behalf of Respondent
Saeed Bazzi Properties, LLC dba Apollo Cannabis Company
Dated: 05/08/2025

Mohamed A. Ghaith (P84343)
Attorney for Respondent

Dated: 05/08/2025

LF: 2024-0402853-A / Saeed Bazzi Prop. dba Apollo, PC-000569, 22-00561 / Consent Order and Stipulation / 2025-01-15

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

In the Matter of

Saeed Bazzi Properties, LLC dba Apollo Cannabis Company ENF No: 22-00561
License No.: PC-000569
_____/

FORMAL COMPLAINT

The Cannabis Regulatory Agency ("CRA") files this formal complaint against Saeed Bazzi Properties, 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*., and Executive Reorganization Order No.2019-2, MCL 333.27001, to investigate alleged violations of the MMFLA and the 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 AND INTENDED ACTION OF THE CRA

3. Respondent holds an active state operating license under the MMFLA to operate a medical marijuana provisioning center in the state of Michigan.

4. Respondent operated at 19737 W. 7 Mile Road, Detroit, Michigan, 48219, 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:

a. On June 17, 2022, the CRA received a complaint from a patient regarding the unauthorized purchases made on their card at Respondent's facility on June 6, 2022; June 7, 2022; June 9, 2022; and June 13, 2022.
b. On June 30, 2022, the CRA visited Respondent's facility and spoke to manager who said he was unaware of patient accounts being used for others. After this visit, the CRA requested hire dates and criminal background history for employees present during the visit.
c. On July 6, 2022, the CRA also requested video surveillance recordings for June 6, 2022; June 7, 2022; June 9; 2022; June 13, 2022; June 24, 2022; and July 1, 2022.
d. On July 13, 2022, the CRA investigator spoke with Respondent's attorney who reported that Respondent's surveillance had not been recording for an unknown period of time since the previous inspection February 10, 2022. Respondent's video surveillance system failed to send a failure notification.
e. On July 18, 2022, the CRA observed that hire dates and Metrc access did not align for four employees. Two employees were granted Metrc two and four months after their start dates and one employee was granted access two months before their start date. The CRA further observed that criminal background checks had been performed after reported start dates and/or access to Metrc for two employees.

Count I

Respondent's actions as described above in paragraphs 5.c. and 5.d. demonstrate a violation of Mich Admin Code, R 420.209(11) which states, a licensee shall keep surveillance recordings for a minimum of 30 calendar days, except in instances of investigation or inspection by the agency in which case the licensee shall retain the recordings until the time as the agency notifies the licensee that the recordings may be destroyed.

Count II

Respondent's actions as described above in paragraphs 5.c. and 5.d. demonstrate a violation of Mich Admin Code, R 420.209(13) which states, a licensee shall maintain a video surveillance system equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the video surveillance system or video surveillance system storage device.

Count III

Respondent's actions as described above in paragraphs 5.b. and 5.e. demonstrate a violation of Mich Admin Code, R 420.602(1) which states, a licensee shall conduct a criminal history background check on any prospective employee before hiring that individual. A licensee shall keep records of the results of the criminal history background checks for the duration of the employee's employment with the licensee. A licensee shall record confirmation of criminal history background checks and make the confirmation available for inspection upon request by the agency.

Count IV

Respondent's actions as described above in paragraphs 5.b. and 5.e. demonstrate a violation of Mich Admin Code, R 420.602(2) which states, in relevant part, a licensee shall comply with all of the following: (b) Enter in the statewide monitoring system an employee's information and level of statewide monitoring system access within 7 business days of hiring for the system to assign an employee identification number. The licensee shall update in the statewide monitoring system employee information and changes in status or access within 7 business days.

Count V

Respondent's actions as described above in paragraphs 5.b. and 5.e. demonstrate a violation of Mich Admin Code, R 420.602(2) which states, in relevant part, a licensee shall comply with all of the following: (c) Remove an employee's access and permissions to the marihuana business and the statewide monitoring system within 7 business days after the employee's employment with the licensee is terminated.

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 Mich Admin Code, R 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 Mich Admin Code, R 420.704(1) 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. A compliance conference request must be submitted to the CRA in writing.

Hearing and compliance conference requests must be submitted in writing by one of the following methods:

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 Cannabis Regulatory Agency at (517) 284-8599 or CRA-LegalHearings@michigan.gov.

Dated: 3/20/2023

By: Alyssa A. Grissom

Digitally signed by Alyssa A. Grissom
Date: 2023.03.20 15:58:51 -04'00'

Alyssa A. Grissom
Legal Section Manager
Cannabis Regulatory Agency