

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

In the Matter of

NTK Investments, LLC  
License No.: AU-G-C-001345

ENF No.: 24-00957

/      CONSENT ORDER AND STIPULATION

CONSENT ORDER

On October 22, 2024, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the adult-use marijuana Class C grower establishment license (AU-G-C-001345) of NTK Investments, LLC (Respondent) under the Michigan Regulation and Taxation of Marihuana Act (MRTMA), MCL 333.27951 *et seq.*, and the administrative rules promulgated thereunder. The formal complaint alleged Respondent violated Mich Admin Code, R 420.102(7), R 420.210(1), R 420.212(1), and R 420.304(2)(b).

The executive director reviewed the stipulation contained in this document and agrees the public interest is best served by resolution of the formal complaint. Therefore, the executive director finds that all of the allegations contained in the formal complaint are true and that Respondent violated Mich Admin Code, R 420.102(7), R 420.210(1), R 420.212(1), and R 420.304(2)(b).

Accordingly, for these violations, IT IS ORDERED:

1. Respondent must pay a fine in the amount of seven thousand and 00/100 dollars (\$7,000.00). This fine shall be paid within 60 days of the effective date of this order by check, money order, or online through Accela Citizen Access (ACA). Instructions on how to make online payments can be found under the Tips for Licensees bulletin section at [www.michigan.gov/cra](http://www.michigan.gov/cra). Check or money orders shall be made payable to the State of Michigan with enforcement number "24-00957" and license number "AU-G-C-001345" clearly displayed on the check or money order. Respondent shall mail the fine to Department of Licensing and

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Regulatory Affairs, Cannabis Regulatory Agency, PO BOX 30205, Lansing, Michigan 48909.

2. If Respondent fails to timely comply with the terms of this order, Respondent's license shall be suspended until compliance is demonstrated.
3. 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](mailto:CRA-CSS@michigan.gov).
4. Respondent shall be responsible for all costs and expenses incurred in complying with the terms and conditions of this consent order.
5. If Respondent violates any term or condition set forth in this order, Respondent shall be subject to fines and/or other sanctions under section 7(1)(c) of the MRTMA, MCL 333.27957, and Mich Admin Code, R 420.808.
6. Upon timely compliance of the terms of this order by Respondent, the matters set forth in the formal complaint shall be deemed resolved and closed subject to this Consent Order.

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

CANNABIS REGULATORY AGENCY

Signed on: 6/6/2025

By: Brian Hanna  
Digitally signed by: Brian Hanna  
DN: CN = Brian Hanna email =  
hannab@michigan.gov C = US O = CRA OU = CRA  
Date: 2025.06.06 10:33:15 -04'00'

Brian Hanna, Executive Director  
or his designee  
Cannabis Regulatory Agency

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## STIPULATION

The parties stipulate to the following:

1. Respondent does not contest the allegations of fact and law in the formal complaint. By pleading no contest, Respondent does not admit the truth of the allegations but agrees that the CRA's executive director or designee may enter an order treating the allegations as true for purposes of resolving the formal complaint.
2. Respondent understands and intends that by signing this stipulation, Respondent is waiving the right under the MRTMA, administrative rules promulgated thereunder, and the Administrative Procedures Act of 1969, MCL 24.201 *et seq.*, to require the CRA to prove the violations set forth in the formal complaint by presentation of evidence and legal authority, and to present a defense to the violations.
3. The parties considered the following in reaching this agreement:
  - a. Respondent provided documentation which states it has conducted a comprehensive review of its internal processes and implemented a series of corrective actions designed to prevent future occurrences.
  - b. Respondent provided updated standard operating procedures (SOPs) and log sheets. The SOPs promote compliance with the administrative rules regarding tracking marijuana or marijuana product in statewide monitoring system (Metrc). The SOPs provide, in part, multiple updates:
    - i. Respondent restructured dry and curing room schedules to during harvest and trim by having one designated dry room per harvest batch throughout the drying process. Further, it has reduced the number of strains assigned to each room and reorganized its scheduling.

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- ii. Respondent implemented the use of door logs for each dry and cure room, which include information such as strain, plant counts, and critical dates for all harvests. Also, weekly room schedules and plant counts have been reorganized.
  - iii. Respondent implemented weighing each harvest batch at least twice.
  - iv. Respondent implemented the use of trim log sheets to record waste and finished weights.
  - v. Respondent implemented sending notification of harvest batch size and required sample percentages information to the safety compliance facility before sampling events occur.
  - c. Respondent provided documentation that it conducts weekly inventory audits. During audits, tracking software and RFID scanners are used.
  - d. Respondent provided documentation which states that its compliance manager has again completed the advanced training on the Metrc Learn platform, including the Cultivation Journey (parts 1-3), Michigan Advanced Cultivator Metrc Training, and Michigan New Business Training, and received training regarding weight discrepancies and package adjustments. The compliance manager is scheduled to complete this training every six months or sooner.
  - e. Respondent was cooperative and wishes to resolve the allegations without the need for and expense of an administrative hearing.
  - f. Respondent has been licensed as a Class C grower since 2023 and has no prior discipline against its license.
4. The CRA's legal division director or her designee must approve this proposed agreement before it is forwarded to the CRA's executive director or his 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 legal division director, executive director, or their 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:

AGREED TO BY:

Alyssa A. Grissom Digitally signed by Alyssa A. Grissom  
Date: 2025.06.05 12:28:05 -04'00'

Johne Mammo  
Johne Mammo (May 28, 2025 11:14 EDT)

Alyssa Grissom, Director  
Legal Division  
or her designee  
Cannabis Regulatory Agency

Johne Mammo, Authorized Officer  
on behalf of Respondent  
NTK Investments, LLC

Dated: 6/5/2025

Dated: 5-28-2025

Denise Pollicella  
Denise A. Pollicella, P55629  
Attorney for Respondent

Dated: 5-29-2025

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

In the Matter of

NTK Investments LLC  
License No: AU-G-C-001345

ENF No: 24-00957

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FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) files this formal complaint against NTK Investments 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.*, and Executive Reorganization Order No.2019-2, MCL 333.27001, to investigate alleged violations of the MRTMA 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 MRTMA or administrative rules.

2. Section 8(1)(d) of the MRTMA provides that the administrative rules must ensure the health, safety, and security of the public and integrity of the marijuana establishment operations.

FACTUAL ALLEGATIONS AND INTENDED ACTION OF THE CRA

3. Respondent holds an active state license under the MRTMA to operate an adult use class C grower establishment in the state of Michigan.

4. Respondent operated at 21680 West Eight Mile Road, Southfield, Michigan 48075, at all times relevant to this complaint.

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

- a. On August 1, 2024, the CRA's Operations Support Section (OSS) referred a complaint to the CRA's Investigations Section indicating that Respondent failed to record marijuana product in the statewide monitoring system (Metrc).
- b. On August 8, 2024, a CRA Regulation Agent (RA) reviewed the OSS referral and observed the following in Metrc:
  - i. On July 4, 2024, Respondent created Metrc tag number 1A40503000448E1000001242 (tag number ending –1242) from 17,050 grams of the entire "Gumbo Harvest 6/25" harvest.
  - ii. On July 5, 2024, Respondent adjusted tag number ending –1242 up by 18,300 grams and noted that the adjustment was due to an entry error.
  - iii. On July 5, 2024, Respondent had 117 grams of tag number ending –1242 tested by a marijuana safety compliance facility.
  - iv. On July 29, 2024, Respondent adjusted tag number ending –1242 up by 6,032 grams and noted that the adjustment was due to "bags labeled waste were SHAKE."
- c. On August 13, 2024, the CRA RA visited Respondent's establishment and met with Respondent's Compliance Manager, S.D.
- d. S.D. stated to the CRA RA that Respondent incorrectly recorded the Gumbo harvest weight and initial weight for tag number ending –1242 as 17,050 grams instead of 41,382 grams in Metrc. S.D. also stated that the 18,300-gram and 6,032-gram adjustments were recorded in Metrc to reflect the correct weight of tag number ending –1242 physically onsite.

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- e. Additionally, since Respondent recorded the weight of “Gumbo Harvest 6/25” incorrectly in Metrc, the marijuana safety compliance facility only collected 117 grams for testing, which is less than 0.5% of the actual weight of the harvest batch.

### **Count I**

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

### **Count II**

Respondent’s actions as described above in paragraphs a, b, and d demonstrate a violation of Mich Admin Code, R 420.210(1), which states except for designated consumption establishments or temporary marihuana events licensed under the MRTMA, a marihuana business must not have marihuana products that are not identified and recorded in the statewide monitoring system pursuant to these rules.

### **Count III**

Respondent’s actions as described above in paragraphs a, b, and d demonstrate a violation of Mich Admin Code, R 420.212(1), which states, in part, all marihuana products must be identified and tracked consistently in the statewide monitoring system under these rules.

### **Count IV**

Respondent’s actions as described above in paragraph e demonstrate a violation of Mich Admin Code, R 420.304(2)(b), which states a laboratory shall collect samples of a marihuana product from another marihuana business, and that marihuana business shall not interfere or prevent the laboratory from complying with all of the following requirements: (b) except otherwise required by the agency,

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the laboratory shall collect a sample size that is sufficient to complete all required analyses, and not less than 0.5% of the weight of the harvest batch.

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.

Pursuant to 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 MRTMA 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

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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 Cannabis Regulatory Agency's legal section at (517) 284-8599 or [CRA-LegalHearings@michigan.gov](mailto:CRA-LegalHearings@michigan.gov).

Dated: 10/22/24

By: Alyssa A. Grissom Digitally signed by Alyssa A. Grissom  
Date: 2024.10.22 08:17:55 -04'00'

Alyssa A. Grissom  
Legal Section Manager  
Cannabis Regulatory Agency

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