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

In the Matter of

JBB Cultivating, LLC
License No.: AU-G-C-001100
_____/

ENF No.: 25-00906

CONSENT ORDER AND STIPULATION

CONSENT ORDER

On October 15, 2025, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the adult use class C grower license (no. AU-G-C-001100) of JBB Cultivating, LLC (Respondent) under the Michigan Regulation and Taxation of Marihuana Act (MRTMA), MCL 333.27951 *et seq.*, and administrative rules promulgated thereunder. The complaint alleged Respondent violated Mich Admin Code, R 420.20.

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 420.20..

Accordingly, for this violation, IT IS ORDERED:

1. Respondent must pay a fine in the amount of two thousand and 00/100 dollars ($2,000.00). 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. 25-00906" and "License No. AU-G-C-001100" 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. 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-IAS@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 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: _____

By: _____
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 MRTMA and administrative rules promulgated thereunder.

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 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. Respondent filed the annual financial statement at issue on January 14, 2026. The CRA accepted the annual financial statement on January 27, 2026.

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

   c. This consent order and stipulation is part of a comprehensive resolution of two related formal complaints against Respondent's adult use marijuana retailer and adult use marijuana grower class C licenses concerning the same conduct.

4. The CRA's Legal Division 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 Legal Division 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
Legal Division Director
or Designee
Cannabis Regulatory Agency
Dated: _____

Jeffrey W. Miller (P78786)
Maryann Hong (P88790)
Assistant Attorneys General
Attorneys for Cannabis Regulatory Agency
Dated: _____

AGREED TO BY:

Bassamn Thweny
Authorized Representative
On behalf of Respondent
JBB Cultivating, LLC
Dated: 3-24-2026

Mike M. Bahoura (P80205)
Attorney for Respondent

Dated: 3/24/2026

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

In the Matter of

JBB Cultivating, LLC
License No.: AU-G-C-001100
_____/

ENF No. 25-00906

FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) files this formal complaint against JBB Cultivating, LLC (Respondent) alleging upon information and belief as follows:

1. The Cannabis Regulatory Agency (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 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. Pursuant to Mich Admin Code, R 420.20, Respondent is required to transmit to the CRA a financial statement of the licensee's total operations by the due date provided by the CRA.

3. Respondent's annual financial statement for fiscal year 2025 was due on or before September 30, 2025.

4. As of the date of this formal complaint, Respondent has failed to file its annual financial statement for fiscal year 2025.

5. Respondent's failure to timely file the required Annual Financial Statement is a violation of Mich Admin Code, R 420.20.

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.

Respondent has the right to request a compliance conference under Mich Admin Code, R 420.704(1) and R 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.

Alternatively, a Respondent has a right to a contested case hearing regarding the allegations in this complaint. Under Mich Admin Code, R 420.704(2), 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 may choose to be represented by a Michigan State Bar licensed attorney regarding this formal complaint. If so, Respondent's attorney must file an appearance with the CRA with the compliance conference or hearing request, or as soon as applicable.

Compliance conference and hearing requests, as well as attorney appearances, 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. Mich Admin Code, R 420.808(3).

Questions about this complaint should be directed to the Cannabis Regulatory Agency at (517) 284-8599 or CRA-LegalHearings@michigan.gov.

Dated: 10/15/25

By: Alyssa A. Grissom

Digitally signed by Alyssa A. Grissom
Date: 2025.10.15 15:59:10 -04'00'

Alyssa A. Grissom, Director
Legal Division
Or her designee
Cannabis Regulatory Agency