CANNABIS
REGULATORY AGENCY

Basis for Action

These general descriptions are not all-inclusive but are simply a means of interpreting the DAR report. This list of rule violations should not be considered exhaustive.

Non-Compliant Sales

- Sales of product on administrative hold
- Overselling (daily or monthly purchase limits)
- Not verifying medical marijuana registry card status or ID
- Improper home delivery
- Not following home delivery procedures
- Not having home delivery procedures

METRC Non-Compliance

- Incorrect inventory
- Product not identified in METRC
- Product without METRC tags
- Missing or incorrect info in METRC
- Inaccurate employee data in METRC

Packaging/Advertising

- Appealing to minors
- Missing labeling information
- Package in not opaque/resealable
- False/deceptive/misleading packaging

Surveillance/Security

- Failure to retain/provide footage
- System not recording
- Unmonitored visitors
- Unlogged visitors
- Product not in secured area or behind the required barrier

Failure to Report Material Changes – Physical Location/Operations

- Physical modifications to the building
- Changes in processing/equipment for processing
- Changing equipment for testing
- Changing SOPs for testing methods

Failure to Report Material Changes – Legal Entity

- New owners, members, managers, officers, licensing agreements
- Addition or removal of a person named in the application or disclosed
- Change in entity name
- Any attempted transfer, sale, or other conveyance of an interest in a marijuana license

Miscellaneous Reporting Issues

- Litigation
- Municipal ordinance violations
- Regulatory disciplinary action

Sampling/Testing

- Issues with reporting of test results

- Criminal activity
- Judgments

- Not using Standard Operating Procedures when sampling or testing marijuana/marijuana product
- Not complying with ISO standards
- Non-compliant sampling events
- Non-compliant fresh frozen transfers
- Product containing banned chemical residue
- Non-homogenous products
- Falsification of data/test results

Non-Compliant Handling/Production

- No serv safe certification(s) for employees making products
- Non-compliance with Good Manufacturing Practices (GMP)
- Non-compliant Records of Formulation (ROF)
- No training manual
- Not training employees on proper production and handling of products

Non-Compliant Transfers Between Marijuana Businesses

- Transfers backward in supply chain under MMFLA
- Product not on a manifest
- Using an unregistered vehicle to complete transfers

Non-Compliant Waste Disposal

- Improper destruction of marijuana waste
- Failure to secure waste
- Did not render product unrecognizable

Miscellaneous Employee Issues

- Underage employees
- Failure to have on staff an employee with required caregiver experience
- Improperly employing a registered caregiver
- Missing required background checks
- Inexperienced lab manager

General Operational Issues

- Grew more plants than allowed by license
- Did not report information within required time
- Did not tag plants properly as they continued growing

Non-Compliance with Bureau of Fire Services (BFS) Requirements

- Operating without proper inspection and approval by BFS

- Operating without proper approval
- Operating outside scope of license