

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

In the Matter of

**Trucenta, LLC
dba Warren Supply Chain Services
License No. AU-P-000272**

ENF Nos.: 24-00514, 24-00686

FORMAL COMPLAINT

The Cannabis Regulatory Agency (CRA) by and through its attorneys, Assistant Attorneys General Adam M. Leyton and Erika N. Marzorati, files this formal complaint against Trucenta, 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 processor business in the State of Michigan.

3. Respondent was licensed to operate at 23455 Regency Park Dr., Suite A, Warren, MI 48089, 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.

ENF 24-00514

5. In April 2024, a CRA intelligence analyst (IA) discovered that Respondent submitted numerous marijuana samples for testing at a licensed marijuana safety compliance facility (lab) without recording the samples or test results into the statewide monitoring system (Metrc).

6. According to the associated invoices and certificates of analysis (COA), Respondent transferred approximately 81 different samples of marijuana product to the lab from November 27, 2023, through May 6, 2024. Of those samples, three failed testing due to the presence of boscalid, a banned chemical.

7. The invoices and COAs identified each sample with numbers or a description of the product.

8. The samples tested at the lab shared common numbers or descriptors with products in Respondent's marijuana inventory in Metrc. For example, samples listed on the November 27, 2023 and May 6, 2024 invoices shared similarities with product in Respondent's marijuana inventory as follows:

November 27, 2023 invoice		
Sample Description (from Invoice or COA)	Associated Package Tag	Metrc Item Name
49128-41	1A405030002B7B5000049128	Distillate
49126-30	1A405030002B7B5000049126	Distillate
65628-23	1A4050300020B0F000065628	Distillate Bulk

May 6, 2024 invoice		
Sample Description (from Invoice or COA)	Associated Package Tag	Metrc Item Name
123979 Dist 1	1A4050300014ADD000123979	Distillate
123979 Dist 2	1A4050300014ADD000123979	Distillate

9. Respondent did not make any inventory adjustments or otherwise document in Metrc that these samples originated from product in Respondent’s marijuana inventory.

10. On May 29, 2024, the IA interviewed Respondent’s employees, T.D., N.C., and D.M., regarding the transfer of the samples to the lab and the source of the products tested at the lab. N.C. explained that Respondent’s employees dropped off the samples to the lab without using a licensed secure transporter. T.D. and D.M. further claimed that the marijuana being tested belonged to Respondent’s employees’ friends.

ENF 24-00686

11. On April 10, 2024, another adult-use processor created a 133,051-gram package of distillate and labeled it in Metrc as 1A405030000CD15000142855 (Distillate -142855).

12. On the same day, the other processor arranged for Distillate -142855 to be sampled for safety compliance testing. The sample passed safety compliance testing and showed no detections for any banned chemicals.

13. On April 29, 2024, the other processor transferred 75,000 grams from Distillate -142855 to Respondent.

14. According to Metrc, Respondent created 15 five-gram packages from Distillate -142855 on May 2, 2024. On May 3, 2024, a licensed lab sampled these 15 packages for research and development (R&D) testing. Of the 15 packages, 11 failed due to detections of bifenthrin, a banned chemical, above the action limit established by the CRA.

15. During an investigation into the discrepant test results, on May 9, 2024, a CRA IA requested Respondent's video surveillance footage showing the arrival of the 75,000-gram package from Distillate -142855 at Respondent's business, storage of the product at Respondent's business, and the entire R&D sampling event. The IA requested that Respondent produce full-time coverage and all applicable camera angles showing the product from arrival to completion of the sampling event.

16. Respondent did not provide all camera angles as requested and there were numerous time gaps in Respondent's submission.

17. Within the surveillance recordings produced, the IA observed Respondent's employee take small amounts of distillate from the 75,000-gram package of Distillate -142855 and place them into approximately 75 small containers on May 1, 2024.

18. Respondent only recorded the creation of 15 five-gram packages in Metrc and failed to record the creation of the approximately 60 additional packages. Moreover, Respondent did not enter the creation of the 15 five-gram packages in Metrc until May 2, 2024.

COUNT 1

Respondent's actions as described above demonstrate a violation of Rule 420.103(2), which relevantly states that a marijuana processor license authorizes a marijuana processor to transfer marijuana only by means of a marijuana secure transporter.

COUNT 2

Respondent's actions as described above demonstrate a violation of Rule 420.103(3), which states that a marijuana processor must accurately enter all transactions, current inventory, and other information into the statewide monitoring system as required in the rules.

COUNT 3

Respondent's actions as described above demonstrate a violation of Rule 420.209(12), which relevantly states that surveillance recordings are subject to CRA inspection and must be kept in a manner that allows the agency to view and obtain copies of the recordings at the marijuana business immediately upon request.

COUNT 4

Respondent's actions as described above demonstrate a violation of Rule 420.210(1), which relevantly states that a marijuana business must not have marijuana products that are not identified and recorded in the statewide monitoring system pursuant to the rules.

COUNT 5

Respondent's actions as described above demonstrate a violation of Rule 420.210(2), which relevantly states that a marijuana business must not have any marijuana product without a batch number or identification tag or label pursuant to the rules and shall immediately tag, identify, or record as part of a batch in the statewide monitoring system any marijuana products as provided in the rules.

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 333.27957(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 attorneys 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 attorneys general.

Respectfully submitted,

/s/ Adam M. Leyton
Adam M. Leyton (P80646)
Erika N. Marzorati (P78100)
Assistant Attorneys General
Attorneys 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: October 30, 2024

LF: 2024-0414739-A / Trucenta, AU-P-000272, ENF 24-00514, -686 / Formal Complaint / 2024-10-30



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

In the Matter of

Trucenta, LLC
dba Warren Supply Chain Services
License No.: AU-P-000272

ENF Nos.: 24-00514, 24-00686

_____ /

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

CANNABIS REGULATORY AGENCY
2407 NORTH GRAND RIVER • P.O. BOX 30205 • LANSING, MICHIGAN 48909
www.michigan.gov/cra

LARA is an equal opportunity employer/program.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

In the Matter of

Trucenta, LLC
dba Warren Supply Chain Services
License No.: AU-P-000272

ENF Nos.: 24-00514, 24-00686

PROOF OF SERVICE

I hereby certify that on NOVEMBER 4, 2024, I provided a copy of the
FORMAL COMPLAINT dated OCTOBER 30, 2024 in the above captioned
case by personal service to:

JOHN PALMER
1675 E. MAPLE RD
TROY, MI
48083

RA Ken Beem
Cannabis Regulatory Agency
Department of Licensing & Regulatory
Affairs