

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

In the Matter of

MONEYLINEHOLDINGS LIMITED LLC
License No.: AU-G-C-000239

ENF No.: 21-00365

_____/ CONSENT ORDER AND STIPULATION

CONSENT ORDER

On August 24, 2021, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the adult-use marijuana grow establishment license AU-G-C-000239 of Moneylineholdings Limited 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(1)(c).

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 the allegations contained in the formal complaint are true and that Respondent violated Mich Admin Code, R 420.102(1)(c).

Accordingly, for these violations, IT IS ORDERED:

1. Respondent must pay a fine in the amount of four thousand five hundred and 00/100 dollars (\$4,500). 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). Instructions on how to make online payments can be found under the Tips for Licensees bulletin section at www.michigan.gov/cra. Check or money orders shall be made payable to the State of Michigan with enforcement number “21-00365” and license number “AU-G-C-000239” clearly displayed on the check or money order. Respondent shall mail the fine

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www.michigan.gov/CRA

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to Department of Licensing and Regulatory Affairs, Cannabis Regulatory Agency, PO BOX 30205, Lansing, Michigan 48909.

2. Within 30 days of the effective date on the consent order:
 - a. All managers and employees responsible for entering inventory in Metrc must complete the Metrc online course “MI Advanced Cultivator Training”. Respondent will provide a list of applicable employees, and certificates of completion proving each employee completed the training within 30 days of the effective date of the consent order.
 - b. Respondent will provide a new standard operating procedure (SOP) detailing how staff will compliantly receive and enter new plants in Metrc inventory, ensuring accurate plant counts.
3. If Respondent fails to timely comply with the terms of this order, Respondent’s license shall be suspended until compliance is demonstrated.
4. 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-LegalHearings@michigan.gov.
5. Respondent shall be responsible for all costs and expenses incurred in complying with the terms and conditions of this consent order.
6. If Respondent violates any term or condition set forth in this order, Respondent will be subject to fines and/or other sanctions under section 7(1)(c) of the MRTMA, MCL 333.27957, and Mich Admin Code, 420.808.
7. 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.

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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: 04/24/2023

By: Adam Sandoval  Digitally signed by Adam Sandoval
Date: 2023.04.24 12:45:49 -04'00'

Brian Hanna, Executive Director
and/or his 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 cited administrative rules promulgated under the MRTMA.
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 had 2,489 plants in inventory for a Class C grow license which allows a limit of 2,000 plants.
 - b. At the time of the violation, Respondent had been approved for an additional Class C grow license, but still needed to pay the licensing fee to receive it.

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- c. Respondent complied with the administrative hold on the 489 excess plants and quarantined them until they were compliantly transferred over to the new license.
 - d. Respondent was cooperative and wishes to resolve the allegations without the need for and expense of an administrative hearing.
 - e. Respondent has been licensed as an adult use grow establishment since 2020 and has no prior discipline against its license.
4. The CRA's enforcement division director or his/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 enforcement division director, executive director, or their designees reject the proposed consent order.

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

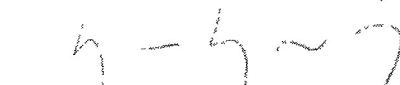
AGREED TO BY:

Desmond Mitchell

Digitally signed by
Desmond Mitchell
Date: 2023.04.23
10:49:47 -04'00'

Desmond Mitchell, Operations Director
and/or his designee
Cannabis Regulatory Agency

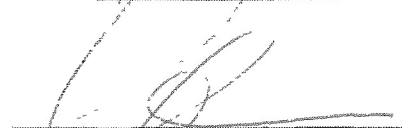
AGREED TO BY:



Safet Sunny Palaj, Member
on behalf of Respondent
Moneylineholdings Limited, LLC

Dated: 04/23/2023

Dated: 4/26/2023



Michelle R.E. Donovan (P58405)
Attorney for Respondent

Dated: 4/26/2023

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ENF No 21-036c
CRA 5062

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

In the Matter of

Moneyline Holdings Limited, LLC
AU-ER No.: 000545
License No.: AU-G-C-000239
ENF No.: 21-00365

CMP No.: 21-000915

_____/

FORMAL COMPLAINT

The Marijuana Regulatory Agency (“Complainant”) files this formal complaint against Moneyline Holdings Limited, LLC (“Respondent”) alleging upon information and belief as follows:

1. The Marijuana Regulatory Agency (MRA) is authorized under the Michigan Regulation and Taxation of Marihuana Act (MRTMA), 2018 IL1, *et seq.*, and Executive Reorganization Order No.2019-2, MCL 333.27001, to investigate alleged violations of the MRTMA and the Administrative Rule 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 marihuana establishment operations.
3. Respondent’s conduct as described below is a risk to public health and safety and/or the integrity of marihuana establishment operations.

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FACTUAL ALLEGATIONS AND INTENDED ACTION OF THE MRA

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

5. Respondent operated at 651 Eden Way Street, Chesaning, Michigan 48616, at all times relevant to this complaint.

6. Following an investigation, the MRA determined that Respondent violated the MRTMA and/or Administrative Rules promulgated thereunder as set forth below:

- a. On July 1, 2021, the MRA performed a semi-annual inspection of Respondent's establishment.
- b. During the semi-annual inspection it was determined that Respondent had 2,489 mature plants entered into the statewide monitoring system (METRC) and on-site.
- c. On July 8, 2021, this was again confirmed by the MRA based upon visual inspection and discussions with the owner of Respondent's facility.
- d. Respondent's cultivation of 2,489 mature marijuana plants is in violation of Mich Admin Code, R 420.102(1)(c) which authorizes the holder of a class C marijuana grower license under MRTMA to cultivate no more than 2,000 mature marijuana plants.

THEREFORE, based on the above, the MRA 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 Mich Admin Code, R 420.704(2), any party aggrieved by an action of the MRA 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 MRA 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.

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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 Emergency Rules. A compliance conference request must be submitted to the MRA 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
Marijuana Regulatory Agency
P.O. Box 30205
Lansing, Michigan 48909

In Person: Department of Licensing & Regulatory Affairs
Marijuana Regulatory Agency
2407 North Grand River
Lansing, Michigan 48906


By Email: MRA-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 Marijuana Regulatory Agency's legal section at (517) 284-8599 or MRA-LegalHearings@michigan.gov.

Dated: 8/24/21

MARIJUANA REGULATORY AGENCY

By: **Claire Patterson**  Digitally signed by Claire Patterson
Date: 2021.08.24 15:12:05 -04'00'

Claire Patterson, Scientific and Legal Section Manager

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