

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

**In the Matter of**

**Pure, LLC  
License No. AU-G-C-000266  
ENF No. 22-00348**

**CONSENT ORDER AND STIPULATION**

**CONSENT ORDER**

On May 17, 2022, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the adult use marihuana class c grower license (no. AU-G-C-000266) of Pure, LLC (Respondent) under the Michigan Regulation and Taxation of Marihuana Act (MRTMA), MCL 333.27951 *et seq.*, and administrative rules promulgated thereunder. The formal complaint alleged Respondent violated Mich Admin Code, R 420.20.

The acting 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 acting 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 these violations, IT IS ORDERED:

1. Respondent must pay a fine in the amount of ten thousand and 00/100 dollars (\$10,000.00). This fine shall be paid within 30 days of the effective date of this order by check or money order made payable to the State of Michigan with "ENF No. 22-00348" clearly displayed on the check or money order. Respondent shall mail the fine payment to: Department of Licensing and Regulatory Affairs, Cannabis Regulatory Agency, P.O. Box. 30205, Lansing, Michigan 48909.
2. If Respondent fails to timely pay the fine, Respondent's license shall be suspended until payment is received.
3. Unless otherwise specified in this order, Respondent shall direct any communications to the CRA regarding the terms of this order to [CRA-LegalHearings@michigan.gov](mailto:CRA-LegalHearings@michigan.gov).
4. 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 after the date signed by the CRA's acting executive director or designee, as set forth below.

CANNABIS REGULATORY AGENCY

Signed on: 11/6/23

By: Brian Hanna  
Brian Hanna  
Acting Executive Director  
Cannabis Regulatory Agency

Digitally signed by: Brian Hanna  
DN: CN = Brian Hanna email =  
hanhab@michigan.gov C = US O = CRA  
OU = CRA  
Date: 2023.11.06 14:42:13 -05'00'

### 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 has hired an accounting firm to handle financial matters and ensure that all financial statements are timely filed.
  - b) Respondent acknowledges that it is responsible for familiarizing itself with, understanding, and complying with all statutory requirements and rules applicable to its business.
  - c) Respondent was cooperative and wishes to resolve the allegations without the need for and expense of an administrative hearing.
4. The CRA's operations director or designee must approve this proposed agreement before it is forwarded to the CRA's acting 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 operations director, acting 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:

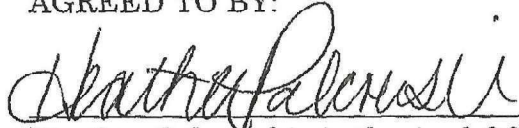
Desmond Mitchell Digitally signed by Desmond Mitchell  
Date: 2023.11.06 09:24:12 -05'00'

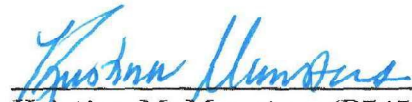
Desmond Mitchell  
Operations Director  
Cannabis Regulatory Agency  
Dated: 11/6/23

/s/ Sarah E. Huyser

Sarah E. Huyser (P70500)  
Assistant Attorney General  
Attorney for Cannabis Regulatory Agency  
Dated: 11/03/2023

AGREED TO BY:

  
Heather Palcowski, Authorized Officer  
On behalf of Respondent  
Pure, LLC  
Dated: 10.6.2023

  
Kristina M. Munsters (P74507)  
Attorney for Respondent  
Dated: 11/3/2023

LF: 2022-0364804-A / Pure, LLC, 22-00348 / Consent Order and Stipulation / 2023-09-25

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

In the Matter of

Pure, LLC  
License No.: AU-G-C-000266

ENF No. 22-00348

FORMAL COMPLAINT

The Cannabis Regulatory Agency (“Complainant”) files this formal complaint against Pure, 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.*, 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. Respondent, under Mich Admin Code, R 420.20, is required to transmit to the CRA a financial statement of the licensee’s total operations by 30 days after the due date provided by the CRA.

3. Respondent’s annual financial statement for fiscal year 2021 was due on or before March 31, 2022.

4. As of the date of this formal complaint, Respondent has failed to file its annual financial statement for FY 2021.

CANNABIS REGULATORY AGENCY  
The MRA became the Cannabis Regulatory Agency (CRA) on April 13, 2022.  
2407 NORTH GRAND RIVER • P.O. BOX 30205 • LANSING, MICHIGAN 48909  
[www.michigan.gov/CRA](http://www.michigan.gov/CRA)

LARA is an equal opportunity employer/program

Executive Reorganization Order 2019-2 created the Marijuana Regulatory Agency (MRA) as a Type I agency within the Department of Licensing and Regulatory Affairs (LARA). MCL 333.27001(1)(a)(d). The MRA exercises its statutory powers, duties, and functions independent of LARA’s direction. MCL 16.103. The MRA became the Cannabis Regulatory Agency (CRA) on April 13, 2022.



5. Respondent's failure to timely file the required Annual Financial Statement is in 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.

A licensee 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. See Mich Admin Code, R 420.704(3) and R 420.808(2)(b). A request for a hearing must be submitted to the CRA in writing within 21 days after service of this complaint. Mich Admin Code, R 420.704(2) and R 420.808(3). Notice served by certified mail is considered complete on the business day following the date of the mailing.

Respondent may also be given an opportunity to meet with the CRA to negotiate a settlement or demonstrate compliance with the MRTMA and administrative rules prior to a contested case hearing. Mich Admin Code, R 420.704(1) and R 420.808(2)(a). A request for a compliance conference request must be submitted to the CRA in writing within 21 days after service of this complaint. Mich Admin Code, R 420.808(3).

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

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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](mailto:CRA-LegalHearings@michigan.gov).

Dated: 

5/17/2022
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**CANNABIS REGULATORY AGENCY**

By: 

Alyssa A. Grissom	Digitally signed by Alyssa A. Grissom Date: 2022.05.17 22:19:59 -04'00'
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Alyssa A. Grissom  
Legal Section Manager  
Enforcement Division  
Cannabis Regulatory Agency

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