

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CANNABIS REGULATORY AGENCY<sup>1</sup>**

**In the Matter of**

**Cross Country Enterprises LLC**

**ENF No. 22-00232**

**AU-ER No.: 000522**

**License Nos.: AU-R-000289, AU-R-000370 & AU-G-A-000108**

**CMP No. 22-000227**

**CONSENT ORDER AND STIPULATION**

**CONSENT ORDER**

On April 6, 2022, the Cannabis Regulatory Agency (CRA) issued a formal complaint against the adult-use marihuana retailer licenses (nos. AU-R-000289 and AU-R-000370 and adult-use class A marihuana grower license (no. AU-G-A-000108) of Cross Country Enterprises 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.

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<sup>1</sup> The Marijuana Regulatory Agency was renamed the Cannabis Regulatory Agency under Executive Reorganization Order No. 2022-1, effective April 13, 2022. MCL 333.27002(1)(a).

Accordingly, for this violation, IT IS ORDERED:

1. Respondent must pay a fine in the amount of nine thousand and 00/100 dollars (\$9,000.00). 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](http://www.michigan.gov/cra/bulletins). Checks or money orders shall be made payable to the State of Michigan with "ENF No. 22-000232" and "License Nos. AU-R-000289, AU-R-000370 & AU-G-A-000108" 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-LegalHearings@michigan.gov](mailto:CRA-LegalHearings@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: 9/19/23

By: Brian Hanna  
Executive Director Brian Hanna  
or Designee  
Cannabis Regulatory Agency

Digitally signed by: Brian Hanna  
DN: CN = Brian Hanna email = hanna@mi.gov, C = US, O = CRA, OU = CRA  
Date: 2023.09.19 13:35:16 -0400

## STIPULATION

The parties stipulate to the following:

1. The facts alleged in the formal complaint are true and constitute a violation of the 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 prior to the filing of the complaint.
  - 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 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, 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: 2023.09.19 12:52:45 -04'00'

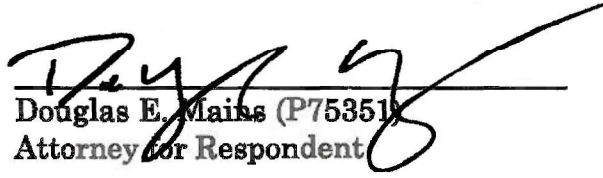
**Desmond Mitchell**  
**Operations Director**  
**Cannabis Regulatory Agency**

**Dated:** 9/19/23

**AGREED TO BY:**

  
**Aram Freji**  
**Authorized Representative**  
**On behalf of Respondent**  
**Cross Country Enterprises LLC**  
**Dated:** 09/18/23

/s/ Sarah E. Huyser  
**Sarah E. Huyser (P70500)**  
**Assistant Attorney General**  
**Attorney for Cannabis Regulatory Agency**  
**Dated:** 09/19/2023

  
**Douglas E. Mains (P75351)**  
**Attorney for Respondent**  
**Dated:** 9-19-2023

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

In the Matter of

Cross Country Enterprises LLC

AU-ER No.: 000522

License No(s): AU-R-000289, AU-R-000370 & AU-G-A-000108

CMP No.: 22-000227

ENF No.: 22-00232

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FORMAL COMPLAINT

The Marijuana Regulatory Agency (“Complainant”) files this formal complaint against Cross Country Enterprises 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), 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 MRA a financial statement(s) of the licensee’s total operations by 30 days after the end of each state fiscal year.
3. Respondent’s annual financial statement(s) for fiscal year 2021 were due on or before December 31, 2021.

4. Respondent filed its annual financial statement(s) for FY 2021 on February 19, 2022, 50 days after the above-referenced deadline.

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

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.

A licensee 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. See Mich Admin Code, R 420.704(3) and R 420.808(2)(b). A request for a hearing must be submitted to the MRA 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 MRA 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 MRA 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  
Marijuana Regulatory Agency  
P.O. Box 30205  
Lansing, Michigan 48909

MARIJUANA REGULATORY AGENCY  
2407 NORTH GRAND RIVER • P.O. BOX 30205 • LANSING, MICHIGAN 48909  
[www.michigan.gov/MRA](http://www.michigan.gov/MRA)

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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. Mich Admin Code, R 420.808(3).

Questions about this complaint should be directed to the Marijuana Regulatory Agency at (517) 284-8599 or [MRA-LegalHearings@michigan.gov](mailto:MRA-LegalHearings@michigan.gov).

Dated: 4/6/2022

**MARIJUANA REGULATORY AGENCY**

By: **Julie Kluytman**  
Digitally signed by: Julie Kluytman  
DN: CN = Julie Kluytman email =  
Kluytmanj@michigan.gov C = US O =  
Marijuana Regulation Agency OU =  
Enforcement Division  
Date: 2022.04.06 13:16:25 -04'00'

Julie Kluytman, Director  
Enforcement Division  
Marijuana Regulatory Agency

MARIJUANA REGULATORY AGENCY  
2407 NORTH GRAND RIVER • P.O. BOX 30205 • LANSING, MICHIGAN 48909  
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