

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

In the Matter of

Klean Herbal Solutions, LLC dba Stash Detroit  
ERG No.: 000459  
License No.: PC-000339  
ENF No.: 21-00490

CMP No.: 21-001322

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FORMAL COMPLAINT

The Marijuana Regulatory Agency (“Complainant”) files this formal complaint against Klean Herbal Solutions, LLC dba Stash Detroit (“Respondent”) alleging upon information and belief as follows:

1. The Marijuana Regulatory Agency (MRA) is authorized under the Medical Marihuana Facilities Licensing Act (MMFLA), MCL 333.27101 *et seq.*, and Executive Reorganization Order No.2019-2, MCL 333.27001, to investigate alleged violations of the MMFLA 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 MMFLA or administrative rules.

2. Section 402(12) of the MMFLA provides that the expiration of a license does not terminate the MRA’s authority to impose sanctions on the license.

3. Section 206(c) of the MMFLA provides that the administrative rules must ensure the health, safety, and security of the public and integrity of the marihuana facility operations.

4. Respondent’s conduct as described below is a risk to public health and safety and/or the integrity of marihuana facility operations.

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## FACTUAL ALLEGATIONS AND INTENDED ACTION OF THE MRA

5. Respondent holds an active state operating license under the MMFLA to operate a medical marijuana provisioning center in the state of Michigan.

6. Respondent operated at 10015 W. Fort St., Detroit, Michigan 48209, at all times relevant to this complaint.

7. Following an investigation, the MRA determined that Respondent violated the MMFLA and/or administrative rules promulgated thereunder as set forth below:

- a. On September 11, 2021, Respondent experienced a partial collapse of its provisioning center that required it to be demolished on September 14, 2021.
- b. On September 16, 2021, the MRA received an anonymous complaint and photograph (taken on approximately September 12, 2021) showing individuals removing items in trash bags from the facility.
- c. Respondent admitted to removing marijuana product from the facility in trash bags and having it stored at a relative's office at a paint yard without the MRA's knowledge or approval in violation of Mich Admin Code, R 420.212(1), which states all marijuana products must be stored at a marijuana business in a secured limited access area or restricted access area and must be identified and tracked consistently in the statewide monitoring system under these rules.
- d. On September 17, 2021, the MRA observed Respondent place the black trash bags containing marijuana product in an SUV and transport the product with an MRA and MSP escort to a licensed facility to store the marijuana product.
- e. On September 21, 2021, the MRA visited the licensed facility where the trash bags containing marijuana product were transported and stored in

order to examine the marijuana product Respondent was able to recover from the collapsed facility.

- f. While reviewing Respondent's marijuana product in the statewide monitoring system (METRC), the MRA discovered a few discrepancies between the information on the product tags and what was recorded in METRC:
  - a. Sour Larry (package tag #1A405010000FB91000004899) – METRC showed a total inventory of one package totaling 453g. However, the MRA observed in Respondent's possession three packages (each marked 453g) totaling 1,359g.
  - b. Ice Cream Cake (package tag #1A4050100008AAE000001177) – METRC showed a total weight of 453g. However, the MRA observed in Respondent's possession one package totaling 553.8g.
  - c. Night Charmer (1A405010000307300003209) – METRC showed a total weight of 454g. However, the MRA observed in Respondent's possession one package totaling 568.7g.
  - d. The Bling (package #1A405010000238D000002508) – METRC showed a total weight of 908g. However, the MRA observed in Respondent's possession two packages totaling 1162.1g.
- g. Because Respondent was in possession of three packages of Sour Larry (package tag #1A405010000FB91000004899), two of the packages were unable to be identified and were not entered into METRC in violation of Mich Admin Code, R 420.210(1), which states except for designated consumption establishments or temporary marijuana events licensed under the Michigan regulation and taxation of marijuana act, a marijuana business must not have marijuana products that are not identified and recorded in the statewide monitoring system pursuant to these rules.
- h. Respondent documented marijuana product quantities as less in METRC than on the physical product tags, which is a violation of Mich Admin Code, R 420.111(4), which states a provisioning center shall comply with all of the following: (b) Enter all transactions, current inventory, and other information

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into the statewide monitoring system as required in the medical marijuana facilities licensing act, these rules, and the marijuana tracking act.

- i. Because Respondent documented its marijuana product quantities as less in METRC than on the physical product tags, Respondent's marijuana product was unable to be identified and tracked consistently in METRC in violation of Mich Admin Code, R 420.212(1), which states, in part, all marijuana products must be identified and tracked consistently in the statewide monitoring system under these rules.

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 333.27407(4) 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.

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 MMFLA and/or the administrative 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

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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 at (517) 284-8599 or [MRA-LegalHearings@michigan.gov](mailto:MRA-LegalHearings@michigan.gov).

Dated: 12/3/21

By: Claire Patterson  
Claire Patterson, Manager  
Scientific and Legal Section Manager  
Enforcement Division  
Marijuana Regulatory Agency

Digitally signed by Claire  
Patterson  
Date: 2021.12.03 13:33:40 -05'00'

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**PROOF OF SERVICE**

I hereby certify that on 12/8/21, I mailed a copy of the  
Formal Complaint dated 12/3/21 in the above captioned case  
by certified mail (return receipt requested) to:

Klean Herbal Solutions, LLC dba Stash Detroit  
c/o Anthony Shallal  
255 S. Old Woodward Ave  
Ste. 310  
Birmingham, Michigan 48009

Abby Rae Brooks

Digitally signed by: Abby Rae Brooks  
DN: CN = Abby Rae Brooks email =  
BrooksA17@michigan.gov C = US O = Marijuana  
Regulatory Agency OU = Scientific and Legal Section  
Date: 2021.12.08 10:14:41 -0500

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Abby Rae Brooks  
Departmental Technician  
Marijuana Regulatory Agency  
Department of Licensing & Regulatory  
Affairs

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