



Advisory Bulletin
June 7, 2022

Monthly Disciplinary Action Reports Now Available

Formal administrative complaints and disciplinary actions taken against adult-use and medical licensees are now available for review in the CRA's new monthly Disciplinary Action Report (DAR). The CRA is committed to making publicly available information accessible and will continue to implement new processes with that commitment to transparency in mind.

The DAR contains the following information:

- Entity Name – name of the licensee that the action was taken against
- License Number – the record number of the Licensee that the action was taken against
- Date Issued – date the disciplinary action was issued
- Disciplinary Action Imposed – the penalty imposed for noncompliance
- Basis for Action - the nature/type/category of administrative rule violation

Basis for Action

These general descriptions are not all-inclusive but are simply a means of interpreting the DAR report. This list of rule violations should not be considered exhaustive.

Non-Compliant Sales

- Sales of product on administrative hold
- Overselling (daily or monthly purchase limits)
- Not verifying medical marijuana registry card status or ID
- Improper home delivery
- Not following home delivery procedures
- Not having home delivery procedures

METRC Non-Compliance

- Incorrect inventory
- Product not identified in METRC
- Product without METRC tags

- Missing or incorrect info in METRC
- Inaccurate employee data in METRC

Packaging/Advertising

- Appealing to minors
- Missing labeling information
- Package in not opaque/resealable
- False/deceptive/misleading packaging

Surveillance/Security

- Failure to retain/provide footage
- System not recording
- Unmonitored visitors
- Unlogged visitors
- Product not in secured area or behind the required barrier

Failure to Report Material Changes – Physical Location/Operations

- Physical modifications to the building
- Changes in processing/equipment for processing
- Changing equipment for testing
- Changing SOPs for testing methods

Failure to Report Material Changes – Legal Entity

- New owners, members, managers, officers, licensing agreements
- Addition or removal of a person named in the application or disclosed
- Change in entity name
- Any attempted transfer, sale, or other conveyance of an interest in a marijuana license

Miscellaneous Reporting Issues

- Litigation
- Municipal ordinance violations
- Regulatory disciplinary action
- Criminal activity
- Judgments

Sampling/Testing

- Issues with reporting of test results

- Not using Standard Operating Procedures when sampling or testing marijuana/marijuana product
- Not complying with ISO standards
- Non-compliant sampling events
- Non-compliant fresh frozen transfers
- Product containing banned chemical residue
- Non-homogenous products
- Falsification of data/test results

Non-Compliant Handling/Production

- No serv safe certification(s) for employees making products
- Non-compliance with Good Manufacturing Practices (GMP)
- Non-compliant Records of Formulation (ROF)
- No training manual
- Not training employees on proper production and handling of products

Non-Compliant Transfers Between Marijuana Businesses

- Transfers backward in supply chain under MMFLA
- Product not on a manifest
- Using an unregistered vehicle to complete transfers

Non-Compliant Waste Disposal

- Improper destruction of marijuana waste
- Failure to secure waste
- Did not render product unrecognizable

Miscellaneous Employee Issues

- Underage employees
- Failure to have on staff an employee with required caregiver experience
- Improperly employing a registered caregiver
- Missing required background checks
- Inexperienced lab manager

General Operational Issues

- Grew more plants than allowed by license
- Did not report information within required time
- Did not tag plants properly as they continued growing
- Operating without proper approval
- Operating outside scope of license

Non-Compliance with Bureau of Fire Services (BFS) Requirements

- Operating without proper inspection and approval by BFS

This month's Disciplinary Action Report may be viewed below. Individual documents are available on our website [here](#).