



State of New Jersey
CANNABIS REGULATORY COMMISSION

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June 27, 2024

VIA CERTIFIED AND ELECTRONIC MAIL to: samantha@greenmedicinenj.com

Samantha Morin
Green Medicine NJ LLC
638 Brunswick Pike
West Amwell, New Jersey 08530

Re: **NOTICE OF VIOLATION - Green Medicine NJ LLC; INV 121 24**

Dear Ms. Morin,

This letter is a Notice of Violation, issued by the New Jersey Cannabis Regulatory Commission ("NJ-CRC") in accordance with N.J.A.C. 17:30A-12.3 to Green Medicine NJ LLC ("Green Medicine"). The investigation commenced on May 9, 2024, and remains on-going as of the date of this correspondence, during which time Green Medicine was found to have committed the following regulatory violations:

1. Violation 1: N.J.A.C. 17:30A-10.5 -

Medicinal marijuana that is prepared for distribution shall be stored securely in compliance with 21 CFR 1301.72.

2. Violation 2: N.J.A.C. 17:30A-9.7 -

(b) At minimum, each ATC shall: ...

... 10. Equip interior and exterior premises with electronic monitoring, video cameras, and panic buttons.

i. A video surveillance system shall be installed and operated to clearly monitor all critical control activities of the ATC and shall be in working order and operating at all times. The ATC shall provide two monitors for remote viewing through telephone lines in State offices. This system shall be approved by the Commission prior to permit issuance.

3. Violation 3: N.J.A.C. 17:30A-13.3(d)

(d) Failure to cooperate with an onsite assessment and or to provide the Commission access to the premises or information may be grounds to revoke the permit of the ATC and to refer the matter to State law enforcement agencies.

4. Violation 4: N.J.A.C. 17:30A-9.9

(a) Each alternative treatment center, at minimum, shall: ...

... 2. Establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of cultivating, stored, usable, and unusable marijuana;

During an on-site inspection conducted by the Compliance Unit on May 9, 2024, at the Green Medicine facility in West Amwell, New Jersey, it was found that in the designated “MOM” room, only twenty plant tags (used to track inventory in the Metrc Seed-to-Sale system) were registered, despite the presence of over 100 properly tagged plants that held Metrc RFID tags. Upon inquiry, it was revealed by Green Medicine staff that the discrepancy was an oversight in recording the remaining plants in the system, and that those plants were intended to be used in the adult-use market upon approval by the Board of Commissioners for the expansion of Green Medicine’s license. In the designated “Vault” room that is not approved for cannabis storage, the Compliance Officer found a series of finished products that were untagged and unaccounted for in the Metrc system. The designated “Vault” room was not the room that was approved for vault storage by the Compliance Officer and the Commission when reviewing site and floor plans for the facility. Having previously approved use of a safe as storage through the Director of Compliance, the Compliance Officer requested to be taken to the room where that safe was kept. The safe was found in the prior-approved vault room. The room was empty save for the safe, and staff did not have the code for the safe and were unable to open said safe upon request.

On May 10, 2024, the Compliance Officer sought to observe the designated “Vault” room and the safe room via camera access that had been provided upon final inspection on October 17, 2023. The cameras for the safe room were not available. Access was requested on May 10, 2024, and granted for the “Vault” room and the safe room. The “Vault” room, unapproved for storage of product, was reviewed once again via camera access on June 12, 2024, and continues to be utilized without authorization for the storage of cannabis.

Within 20 business days of the receipt of the Notice of Violation, Green Medicine shall (1) Correct the violations; (2) Notify the Commission, in writing, with a postmark date that is within 20 business days of the date of receipt of the Notice of Violation, of any corrective actions taken to correct the violations, and the date of implementation of such corrective actions.

This Notice of Violation satisfies the NJ-CRC's responsibility to provide notice before any enforcement action shall be taken, as required by N.J.A.C. 17:30A-13.3 and 13.5. Green Medicine is notified that the above-referenced violations may result in the imposition of penalties in accordance with the Medicinal Marijuana regulations.

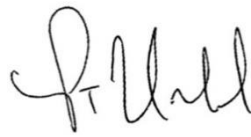
N.J.A.C. 17:30A-13.8(a) establishes that: “Any failure to adhere to the Act and this chapter documented by the Commission may result in sanctions, including suspension, revocation, non-renewal, or denial of a permit and referral to State or local law enforcement.” Corrective action taken by Green Medicine does not preclude the NJ-CRC from imposing penalties but may be taken into consideration when considering the penalty to be imposed for each violation.

Green Medicine has acted in violation of the Medicinal Marijuana regulations and the purpose and intent of the Jake Honig Act by failing to properly track their medicinal marijuana inventory, improperly storing their medicinal marijuana, and failing to provide adequate access to the facility by locking certain areas of the facility and failing to provide access to security cameras.

The NJ-CRC hereby orders Green Medicine to immediately conform its operations for storage and security with the Medicinal Marijuana regulations and the Standard Operating Procedures on file with the Commission. The NJ-CRC reserves the right to impose penalties for this regulatory violation, including but not limited to suspension or revocation.

The NJ-CRC appreciates your expeditious cooperation in this matter. Any questions regarding this correspondence can be sent via e-mail to your assigned Compliance Officer.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Urbish', written in a cursive style.

Paul Thomas Urbish, Esq.
Director
Office of Compliance and Investigations
New Jersey Cannabis Regulatory Commission