

1 **BEFORE THE CANNABIS COMPLIANCE BOARD**
2 **STATE OF NEVADA**

3
4 STATE OF NEVADA, CANNABIS
COMPLIANCE BOARD,

Case No. 2023-01

5 Petitioner,

6 vs.

7 GREENWAY HEALTH COMMUNITY,
8 LLC,



9 Respondent.

10
11 **COMPLAINT FOR DISCIPLINARY ACTION**

12 The Cannabis Compliance Board of the State of Nevada (the "CCB"), by and through
13 counsel, Aaron D. Ford, Attorney General of the State of Nevada, and L. Kristopher Rath,
14 Esq., Senior Deputy Attorney General, having a reasonable basis to believe that
15 Respondent Greenway Health Community, LLC ("GHC" or "Respondent") has violated
16 provisions of Chapters 678A through 678D of the Nevada Revised Statutes ("NRS"), and
17 the Nevada Cannabis Compliance Regulations ("NCCR"), hereby issues its Complaint,
18 stating the CCB's charges and allegations as follows:

19 **JURISDICTION**

20 1. During all relevant times mentioned in this Complaint, GHC held, and
21 currently holds, the following licenses:

22 ID	License	Last Issued / Renewed	Address
23 P097	Medical Production 90069815947957903573	May 20, 2022	
24 RP097	Adult-use Production 10204272765771786596	March 1, 2022	

25
26 2. During all relevant times mentioned in this Complaint, GHC is and was
27 registered as a Domestic Limited Liability Company in the State of Nevada. The Nevada
28 Secretary of State lists the managing members of GHC as: Jason S. Ching, Steven J. Lopez,

1 and Daniel C. Caravette. The point of contact with the CCB for GHC is Daniel C.
2 Caravette.

3 3. As GHC holds its licenses with CCB, it is subject to NRS Title 56 and the
4 NCCR for the violations asserted herein. Therefore, GHC is subject to the jurisdiction of
5 the CCB and subject to discipline pursuant to NRS 678A through 678D and the relevant
6 provisions of the NCCR.

7 4. Pursuant to NRS 678A.500 and 678A.510(1), the CCB's Executive Director
8 has transmitted the details of the suspected violations of GHC to the Attorney General and
9 the Attorney General has conducted an investigation of the suspected violations to
10 determine whether they warrant proceedings for disciplinary action. The Attorney General
11 has recommended to the Executive Director that further proceedings are warranted, as set
12 forth in this CCB Complaint. The Executive Director has transmitted this recommendation
13 and information to the CCB. Pursuant to NRS 678A.510(2)(b), the CCB has voted to
14 proceed with appropriate disciplinary action under NRS 678A.520 through 678A.600.
15 Pursuant to NRS 678A.520(1), the CCB's Executive Director has authorized service of this
16 Complaint upon Respondent.

17 **FACTUAL ALLEGATIONS**

18 5. CCB incorporates all prior Paragraphs as though fully set forth herein.

19 6. During February through April 2022, CCB agents conducted an
20 audit/inspection, and investigation of GHC's cannabis production facility (the "2022
21 Investigation"). The CCB agents involved in the 2022 Investigation were Erica Scott,
22 Kristine Vasilevsky, and Christine Shoemaker (all of whom may be collectively referred to
23 herein as the "CCB Agents").

24 7. The CCB Agents initially attempted to access the GHC facility during regular
25 business hours on February 23, 2022, but could not access the facility and were told that
26 management was in Chicago and no one was available locally to provide access. The CCB
27 Agents did access the GHC facility on February 24, 2022; however, when on site on
28 February 24, 2022 (and again on April 6, 2022), the CCB Agents were denied access to a
safe located within the facility, having been told by GHC employees that they had no access

1 to said safe. The CCB Agents again attempted to gain access to the GHC facility during
2 normal business hours on March 15, 2022, but were again unable to do so.

3 8. In order to gain access to the GHC facility again, on March 23, 2022, CCB
4 agent Vasilevsky, as a courtesy¹, emailed GHC's point of contact to seek entrance to the
5 facility. There was no response to this email, so Agent Vasilevsky followed up with a second
6 email requesting access on March 25, 2022.

7 9. On April 5, 2022, the CCB Agents again attempted to visit the GHC facility,
8 but were told that no one was available to allow an inspection and that an employee located
9 in Las Vegas would call them to let the CCB Agents know when the CCB Agents could
10 return later that day; however, this employee never called back to allow entry on April 5;
11 rather, the CCB Agents were told to come back the following day, on April 6.

12 10. On April 6, 2022, the CCB Agents were finally allowed back into the GHC
13 facility to continue with their investigation.

14 11. Despite the multiple instances of obstructing the CCB Agents from entering
15 the GHC facility, GHC's visitor logs and video surveillance documented that there were
16 employees and others at the GHC facility on the following dates: March 15, 20, 21, 22, 24,
17 28, 30, and 31, as well as on April 1, 4, and 5.

18 12. In addition, when video footage was requested to verify who was in the facility
19 and when they were there, GHC provided video footage that was missing many hours and
20 was therefore incomplete. Only after further request did GHC provide the entire footage.

21 13. During the course of the 2022 Investigation, the CCB Agents found that GHC
22 failed to follow seed-to-sale tracking requirements because the production logs GHC
23 provided to the CCB Agents on or about April 11, 2022, demonstrate that flower and
24 shake/trim was used in production runs for December 2, 2021, through March 15, 2022, but
25 the amounts of cannabis noted as used for extraction in the production logs did not match
26 amounts used as recorded in METRC. This was found on nine separate occasions as

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28 ¹ Inspections are designed to be random, not scheduled, so the licensee's compliance can be evaluated properly, without an opportunity to "prepare" for an inspection. As such, the email was sent as a courtesy only, given the prior problems CCB Agents had in accessing GHC's facility.

1 follows:

2	3	4	5	6	7	8	9
Production Log Date	Flower or Shake/Trim METRC Tag	Production Log Flower or Shake/Trim Documented as Used (g)	Amount Flower or Shake/Trim Recorded as Used in METRC (g)	Oil Created METRC Tag	Production Log Crude Bulk Oil Documented as Produced (g)	Crude Bulk Oil Recorded as Produced in METRC	
12/3/21	6032	6,788	786	1462	Left blank	786	
12/14/21	6033	6,784	0	None	780	0	
12/14/21	6033	6,784	0	None	184	0	
12/16/21	6034	6,783	754	1465	754	754	
12/22/21	6037	6,782	734	1466	734	734	
01/04/22	6038	6,778	772	1467	772	772	
01/09/22	6035	6,778	728	1468	772	728	
01/11/22	6036	6,776	650	1469	650	650	
03/12/22	4385, 4386 & 4387	5,833.65	5,799.5	1519	1,104	1,104	

17 14. During the course of the 2022 Investigation, specifically on April 6, 2022, the
18 CCB Agents found that GHC again failed to follow seed-to-sale tracking requirements
19 because the GHC facility did not have in its physical inventory 12 packages of cannabis
20 and/or cannabis product that GHC had listed as present in METRC. This resulted in a

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1 variance of 38.547 kilograms of flower and shake/trim and a 2.9806 kilogram variance of
 2 concentrate. This was found on 12 separate occasions as follows:

METRC Tag Ending	Item	Category	METRC Quantity (g)	Physically On Hand (g)	Variance (g)
1507	Cookies 2-22-2022 Distillate 2	Solvent Based Concentrate	1,000	0	-1,000
4387	WCR - Flower AFE	Flowers/Buds Approved for Extraction	980	0	-980
4388	GG4 - Flower AFE	Flowers/Buds Approved for Extraction	2,180	0	-2,180
4389	Fruit Pie - Flower AFE	Flowers/Buds Approved for Extraction	2,259.7	0	-2,259.7
4390	Fruit Pie - Flower AFE	Flowers/Buds Approved for Extraction	2,259.9	0	-2,259.9
1445	Wedding Cake Distillate 11-11-2021	Solvent Based Concentrate	988.7	0	-988.7
1991	TD2 Distillate Lot 1	Solvent Based Concentrate	991.9	0	-991.9
6032	Shake - GH - Blue Zkittlez	Shake/Trim	6,002	0	-6,002
6033	Shake - GH - Cherry Death Star	Shake/Trim	6,784	0	-6,784
6034	Shake - GH - Cherry Death Star	Shake/Trim	6,028	0	-6,028
6037	Shake - GH - Cherry Death Star	Shake/Trim	6,048	0	-6,048
6038	Shake - GH - Cherry Death Star	Shake/Trim	6,006	0	-6,006

15. Also on April 6, 2022, the CCB Agents found that GHC had again failed to follow seed to sale tracking requirements by holding 4 concentrated cannabis packages with

1 blue METRC tags attached which were listed as “unused” in METRC. Specifically, the
2 offending packages were as follows:

METRC Tags Attached	Item	Concentrate with Jar (g)	Jar Tare Weight	Concentrate Weight (g)
1A4040300005E26000001504	Bulk Concentrate	1658	695	963
1A4040300005E26000001480	R&D Concentrate	1640	695	945
1A4040300005E26000001464	Unlabeled Concentrate	834	650	184
1A4040300005E26000001463	Unlabeled Concentrate	1,430	650	780

10
11 16. During the course of the 2022 Investigation, the CCB Agents also found that
12 GHC had failed to properly tag cannabis and cannabis product as required. Specifically,
13 on April 6, 2022, the CCB Agents found 2 jars of concentrate totaling 1,000g tagged with
14 blue Adult-Use METRC tag 1A404030000083E000001223 God Bud- Distillate, but this
15 package was recorded in the Medical METRC inventory which requires a yellow Medical
16 METRC tag. Also, the CCB Agents found 1 jar of 496.8g concentrate without any METRC
17 tag; instead, there was an in-house label which read “Tails/Waste.”

18 17. During the course of the 2022 Investigation, the CCB Agents requested video
19 surveillance footage for April 5, 2022, from 10:30 a.m., through April 6, 2022, 8:40 a.m.
20 However, the video footage GHC provided lacked hours of footage from the extraction room.
21 Therefore, GHC failed to properly respond to Board Agents’ request for video footage.

22 18. In addition to the foregoing, the CCB Agents also found the additional
23 following violations during the 2022 Investigation:

- 24 a. GHC failed to provide written notice to the Board within 10 days after
25 employees started work and/or terminated work with GHC, as required
26 by NCCR 6.087(3)&(4). At the time of the 2022 Investigation, GHC
27 showed 12 employees in METRC who were not listed on the current
28 employee list GHC provided the CCB Agents. Also, the current

1 employee list provided showed one employee who was not listed in
2 GHC's METRC employee list.²

3 b. GHC failed to timely file a required quarterly inventory report for the
4 fourth quarter of 2021 for both licenses P097 and RP097, as required
5 under NCCR 6.080(8)(c).

6 c. GHC failed to timely file quarterly reporting concerning its production,
7 purchases and sale of cannabis and cannabis products for both licenses
8 P097 and RP097 for the fourth quarter of 2021, as required under
9 NCCR 6.135.

10 VIOLATIONS OF LAW

11 19. CCB incorporates all prior Paragraphs as though fully set forth herein.

12 20. As to licenses P097 and RP097, Respondent GHC violated NCCR
13 4.035(1)(a)(10) & (11) and NCCR 5.075, by failing to immediately admit regulatory
14 personnel into the premises of GHC's cannabis establishment and obstructing regulatory
15 personnel from performing their duties. Specifically, as set forth in Paragraphs 7 through
16 12, above, GHC did not allow the CCB Agents immediate access to the GHC facility, and
17 required the CCB Agents to make multiple attempts and engage in multiple
18 communications with multiple individuals over multiple days before access could be gained
19 to the facility, even while GHC employees were working at the facility. Even after gaining
20 access to the GHC facility, the CCB Agents were denied access to a safe within the facility.
21 GHC further obstructed the CCB's investigation by failing to provide all of the video
22 surveillance footage the CCB Agents requested. The foregoing acts and omissions
23 constitute at least one Category I violation, which carries a civil penalty of not more than
24 \$90,000 and a suspension of GCH's licenses for not more than 30 days. NCCR 4.035(2)(a)(1).

25 21. As to licenses P097 and RP097, Respondent GHC violated NCCR
26 4.050(1)(a)(3) and NCCR 6.080(8) by failing to comply with seed-to-sale tracking
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28 ² GHC was found to have this same violation during an audit on December 21, 2021, in which one employee working there was not recorded in METRC as an employee of GHC.

1 requirements. Specifically, as detailed in Paragraph 13, above, the amounts of cannabis
2 and cannabis products noted as used for extraction in GHC production logs did not match
3 the amounts used as recorded in METRC. This occurred on 9 separate occasions. These
4 acts and omissions constitute at least one Category III violation, which carries a civil
5 penalty of not more than \$10,000. NCCR 4.050(2)(a)(1). In the alternative, the acts and
6 omissions set forth in this Paragraph (and Paragraph 13) constitute 9 Category III
7 violations, which carries a civil penalty of not more than \$220,000 and requires revocation
8 of licenses P097 and RP097. NCCR 4.050(2)(a)(1)-(5).

9 22. As to licenses P097 and RP097, Respondent GHC violated NCCR
10 4.050(1)(a)(3) and NCCR 6.080(8) by failing to comply with seed-to-sale tracking
11 requirements. Specifically, as detailed in Paragraph 14, above, the GHC facility did not
12 have in its physical inventory 12 packages of cannabis and cannabis product that GHC had
13 listed as present in METRC. These acts and omissions constitute at the least a second
14 Category III violation, which carries a civil penalty of not more than \$30,000 and/or a
15 suspension of licenses P097 and RP097 of not more than 10 days. NCCR 4.050(2)(a)(2). In
16 the alternative, the acts and omissions set forth in this Paragraph (and Paragraph 14)
17 constitute 12 additional Category III violations, which requires revocation of licenses P097
18 and RP097. NCCR 4.050(2)(a)(1)-(5).

19 23. As to licenses P097 and RP097, Respondent GHC violated NCCR
20 4.050(1)(a)(3) and NCCR 6.080(8) by failing to comply with seed-to-sale tracking
21 requirements. Specifically, as detailed in Paragraph 15, above, the GHC facility held 4
22 concentrated cannabis packages with blue METRC tags that were marked as “unused” in
23 METRC. These acts and omissions constitute at the least a third Category III violation,
24 which carries a civil penalty of not more than \$90,000 and/or a suspension of licenses P097
25 and RP097 of not more than 20 days. NCCR 4.050(2)(a)(3). In the alternative, the acts and
26 omissions set forth in this Paragraph (and Paragraph 15) constitute 4 additional Category
27 III violations, which requires revocation of licenses P097 and RP097. NCCR 4.050(2)(a)(1)-
28 (5).

1 24. As to licenses P097 and RP097, Respondent GHC violated NCCR
2 4.050(1)(a)(23) by failing to properly tag cannabis and cannabis products as required.
3 Specifically, as set forth in Paragraph 16, above, GHC used an adult use METRC tag for a
4 package recorded in METRC as medical cannabis. GHC also failed to tag one jar of
5 concentrate, as set forth in Paragraph 16, above. These acts and omissions constitute at
6 the least a fourth Category III violation, which carries a civil penalty of not more than
7 \$90,000 and/or a suspension of licenses P097 and RP097 of not more than 60 days. NCCR
8 4.050(2)(a)(4). In the alternative, the acts and omissions set forth in this Paragraph (and
9 Paragraph 16) constitute 2 additional Category III violations, which requires revocation of
10 licenses P097 and RP097. NCCR 4.050(2)(a)(1)-(5).

11 25. As to licenses P097 and RP097, Respondent GHC violated NCCR
12 4.055(1)(a)(14) by failing to properly respond to a Board's Agent's request for video footage.
13 Specifically, as set forth in Paragraph 17, above, the CCB agents requested 22 hours and
14 10 minutes of video footage from the GHC facility. The video footage GHC provided lacked
15 hours of footage from the extraction room. This omission constitutes a Category IV
16 violation, which carries a civil penalty of not more than \$5,000. NCCR 4.055(2)(a)(1).

17 26. As to licenses P097 and RP097, Respondent GHC violated NCCR
18 4.060(1)(a)(6) and NCCR 6.087(3)&(4) by failing to timely notify the CCB of changes in the
19 status of employment of 13 of its cannabis establishment agents. Specifically, as set forth
20 in Paragraph 18(a), above, GHC did not timely notify CCB of 12 of GHC's cannabis
21 establishment agents starting work at the GHC facility and one of GHC's cannabis
22 establishment agents terminating work at the GHC facility. These acts and omissions
23 constitute at least one Category V violation, which carries the penalty of a formal warning.
24 NCCR 4.060(2)(a)(1). In the alternative, these acts and omissions constitute thirteen
25 separate Category V violations, which carries the penalty of a formal warning and a civil
26 penalty of not more than \$357,500, and/or a suspension of not more than 40 days. NCCR
27 4.060(2)(a)(1)-(6).

28 27. As to licenses P097 and RP097, Respondent GHC violated NCCR

1 4.060(1)(a)(7), NCCR 6.080(8)(c), and 6.135 by failing to properly submit reports required
2 by the Board. Specifically, as set forth in Paragraphs 18(b) and 18(c), above, GHC failed to
3 timely and properly submit a quarterly inventory report, and a quarterly report on its
4 production, purchases and sales of cannabis and cannabis products, for the fourth quarter
5 of 2021. These omissions constitute at least two additional Category V violations, which
6 carry a civil penalty of not more than \$7,500 and/or a suspension for not more than 3 days.
7 NCCR 4.060(2)(a)(2)-(3). In the alternative, should the violations set forth in Paragraph
8 31 be deemed to constitute 13 separate Category V violations, then the violations set forth
9 in this Paragraph constitute the 14th and 15th Category V violations, which carry a civil
10 penalty of \$80,000. NCCR 4.060(2)(a)(6).

11 **DISCIPLINE AUTHORIZED**

12 Pursuant to the provisions of NRS 678A.600, NCCR 4.020, 4.030, 4.035 through
13 4.060, and 5.100, the CCB has the discretion to impose the following disciplinary actions:

- 14 1. Revoke the cultivation licenses of GHC;
- 15 2. Suspend the cultivation licenses of GHC;
- 16 3. Impose a civil penalty of not more than \$90,000 for each separate violation of
17 NRS Title 56 and the NCCR on the cultivation licenses of GHC; and
- 18 4. Take such other disciplinary action as the CCB deems appropriate.

19 The CCB may order one or any combination of the discipline described above.

20 **RELIEF REQUESTED**

21 Based on the foregoing, counsel for the CCB respectfully requests the CCB impose
22 at least the penalty of a 123-day suspension, civil penalties against GHC in the amount of
23 \$322,500, and a written warning regarding GHC's first Category V violation, for P097 and
24 RP097. In the alternative, based on the alternative relief requested above, counsel for the
25 CCB requests the CCB revoke licenses P097 and RP097 and impose a civil penalty of
26 \$752,500.

27 **NOTICE TO RESPONDENT**

28 **PLEASE TAKE NOTICE**, that Respondent has a right to request a hearing on the

1 charges set forth herein, pursuant to NRS 678A.510 through 678A.590. **Failure to**
2 **demand a hearing constitutes a waiver of the right to a hearing and to judicial**
3 **review of any decision or order of the Board, but the Board may order a hearing**
4 **even if the respondent so waives his or her right. NRS 678A.520(2)(e).**

5 **PLEASE TAKE NOTICE**, you, as the Respondent, **must answer this Complaint**
6 **within 20 days after service of this Complaint**, unless granted an extension. Pursuant
7 to NRS 678A.520(2), in the answer Respondent:

8 (a) Must state in short and plain terms the defenses to each claim asserted.

9 (b) Must admit or deny the facts alleged in the complaint.

10 (c) Must state which allegations the respondent is without knowledge or information
11 form a belief as to their truth. Such allegations shall be deemed denied.

12 (d) Must affirmatively set forth any matter which constitutes an avoidance or
13 affirmative defense.

14 (e) May demand a hearing. **Failure to demand a hearing constitutes a waiver**
15 **of the right to a hearing and to judicial review of any decision or order of**
16 **the Board**, but the Board may order a hearing even if the respondent so waives his
17 or her right.

18 **Failure to answer or to appear at the hearing constitutes an admission by**
19 **the respondent of all facts alleged in the Complaint. The Board may take action**
20 **based on such an admission and on other evidence without further notice to the**
21 **respondent. NRS 678A.520(3).**

22 The Board shall determine the time and place of the hearing as soon as is reasonably
23 practical after receiving the Respondent's answer. The Board may assign a hearing officer
24 to conduct the hearing under NCCR 2.070, 4.095, and 4.110. The Board or its assigned
25 hearing officer shall deliver or send by registered or certified mail a notice of hearing to all
26 parties at least 10 days before the hearing. The hearing must be held within 45 days after
27 receiving the respondent's answer unless an expedited hearing is determined to be
28 appropriate by the Board, in which event the hearing must be held as soon as practicable.

1 NRS 678A.520(4). The Chair of the Board or the assigned hearing officer may grant one or
2 more extensions to the 45-day requirement pursuant to the request of a party or an
3 agreement by both parties.

4 Respondent's Answer and Request for Hearing must be either: mailed via registered
5 mail, return receipt; or emailed to:

6 Tyler Klimas, Executive Director
7 Cannabis Compliance Board
8 700 East Warm Springs Road, Ste. 100
9 Las Vegas, Nevada 89119
10 tklimas@ccb.nv.gov

11 If served by email, Respondent must ensure that it receives an acknowledgement of
12 receipt email from CCB as proof of service. Respondent is also requested to email a copy of
13 its Answer and Request for Hearing to the Senior Deputy Attorney General listed below at
14 lrath@ag.nv.gov.

15 As the Respondent, you are specifically informed that you have the right to appear
16 and be heard in your defense, either personally or through your counsel of choice at your
17 own expense. At the hearing, the CCB has the burden of proving the allegations in the
18 Complaint by a preponderance of the evidence. NCCR 4.120. The CCB will call witnesses
19 and present evidence against you. You have the right to respond and to present relevant
20 evidence and argument on all issues involved. You have the right to call and examine
21 witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter
22 relevant to the issues involved.

23 You have the right to request that the CCB issue subpoenas to compel witnesses to
24 testify and/or evidence to be offered on your behalf. In making this request, you may be
25 required to demonstrate the relevance of the witness's testimony and/or evidence.

26 If the Respondent does not wish to dispute the charges and allegations set forth
27 herein, within 30 days of the service of this Complaint, Respondent may pay the minimum
28 requested civil penalties set forth above in the total amount of \$322,500, and discontinue

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1 its operations for 123 days during which its licenses are suspended, on notice to:

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3 Tyler Klimas, Executive Director
4 Cannabis Compliance Board
5 700 East Warm Springs Road, Ste. 100
6 Las Vegas, Nevada 89119

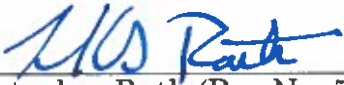
7 YOU ARE HEREBY ORDERED to immediately cease the activity described above
8 which is a violation of Nevada law.

9 DATED: February 27, 2023.

10 STATE OF NEVADA, CANNABIS COMPLIANCE BOARD

11 By: 
12 Tyler Klimas, Executive Director
13 Cannabis Compliance Board
14 700 East Warm Springs Road, Ste. 100
15 Las Vegas, Nevada 89119

16 AARON D. FORD
17 Attorney General

18 By: 
19 L. Kristopher Rath (Bar No. 5749)
20 Senior Deputy Attorney General
21 555 E. Washington Ave, Suite 3900
22 Las Vegas, Nevada 89101
23 (702) 486-3420

24 Attorneys for the Cannabis Compliance Board
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26
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**DECLARATION AND CERTIFICATE OF SERVICE OF
COMPLAINT FOR DISCIPLINARY ACTION
(Service via Mail)**

I, Amber Virkler, hereby certify and affirm that:

1. I am over the age of 18 years old.
2. I am a Board Agent of the Cannabis Compliance Board ("CCB"), as defined in NCCR 1.068.
3. Pursuant to NRS 678A.520 and NCCR 4.075, I have served the Respondent herein with the Complaint for Disciplinary Action ("Complaint") in the above captioned matter as follows:

By placing a true and correct copy of the Complaint to be deposited for mailing in the United States Mail in a sealed envelope via registered or certified mail, prepaid in Las Vegas, Nevada, to Respondent's point of contact with the CCB under NCCR 2.050 at Respondent's address on file with the Board as follows:

Name of point of contact served: Daniel Caravette

Address on file with CCB: [REDACTED]

Date of Service: February 28, 2023

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/28/2023
(date)


(signature)

cc: Daniel Caravette, [REDACTED]
via First Class Mail

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