

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

3 STATE OF NEVADA, CANNABIS
4 COMPLIANCE BOARD,

5 Petitioner,

Case No. 2023-003

6 vs.

7 CLARK NMSD, LLC (D186, RD186),

8 Respondent.

9 **COMPLAINT FOR DISCIPLINARY ACTION**

10 The Cannabis Compliance Board of the State of Nevada (the “CCB”), by and through
11 its counsel Aaron D. Ford, Attorney General of the State of Nevada and Emily N. Bordelove,
12 Esq., Senior Deputy Attorney General, having a reasonable basis to believe that CLARK
13 NMSD, LLC, under license identification numbers D186 & RD186 (“CLARK D186” or
14 “Respondent”) has violated provisions of Chapters 678A through 678D of the Nevada
15 Revised Statutes (“NRS”) and the Nevada Cannabis Compliance Regulations (“NCCR”),
16 hereby issues its Complaint, stating the CCB’s charges and allegations as follows:

17 **JURISDICTION**

18 1. During all relevant times mentioned in this Complaint, CLARK D186 held, and
19 currently holds, the following licenses at issue in this Complaint :

ID	License	Last Issued / Renewed	Address
D186	Medical Cannabis Dispensary 25025985357868237824	6/06/2022	1324 S 3rd Street, Las Vegas, NV, 89104
RD186	Adult-use Cannabis Retail Store 33333930069916107890	6/06/2022	1324 S 3rd Street, Las Vegas, NV, 89104

24 2. During all relevant times mentioned in this Complaint, CLARK D186 is and was
25 registered as a Domestic Limited Liability Company in the State of Nevada. The Nevada
26 Secretary of State lists the managers of CLARK D186 as Pejman Bady, Pouya Mohajer,
27 and Joseph Kennedy. The CCB’s point of contact for CLARK D186’s licenses D186 & RD186
28 is Amanda Connor.

1 3. As CLARK D186 holds its licenses with CCB, it is subject to NRS Title 56 and the
2 NCCR for the violations asserted herein. Therefore, CLARK D186 is subject to the
3 jurisdiction of the CCB and subject to discipline pursuant to NRS 678A through 678D and
4 the relevant provisions of the NCCR.

5 4. Pursuant to NRS 678A.500 and 678A.510(1), the CCB's Executive Director has
6 transmitted the details of the suspected violations of CLARK D186 to the Attorney General,
7 and the Attorney General conducted an investigation of the suspected violations to
8 determine whether they warrant proceedings for disciplinary action. The Attorney General
9 has recommended to the Executive Director that further proceedings are warranted, as set
10 forth in this CCB Complaint. The CCB has authorized proceeding with disciplinary action
11 against CLARK D186, pursuant to NRS 678A.510(2)(b). Pursuant to NRS 678A.520(1), the
12 CCB's Executive Director has authorized service of this Complaint upon CLARK D186.

13 **FACTUAL ALLEGATIONS**

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

15 **A. ROUTINE AUDIT ON JULY 27, 2021.**

16 6. On or about July 27, 2021, Board Agents Erica Scott ("Agent Scott") and Christy
17 Thurston ("Agent Thurston") (collectively "Board Agents"), conducted a routine audit of
18 CLARK D186's Facility at 1324 S 3rd Street, Las Vegas, NV, 89104.

19 7. During the sample inventory that occurred during the audit, Board Agents
20 observed that packages pulled as sampled did not reconcile with METRC as follows, which
21 constitute violations of NCCR 6.080(7):

22

	METRC TAG ending	Product Description	METRC Inventory	Physical Inventory	Variance
23	1. 3650	Strawberry Banana 1g Preroll	21 each (ea.)	19 ea.	2 ea.
24	2. 5810	OMG THC Chocolate Almonds (100mg THC)10 pcs	55 ea.	46 ea.	9 ea.
25	3. 3109	Infused Preroll-Fumeur Rocket-0.5g- Strawberry Shortcake	22 ea.	19 ea.	3 ea.
26	4. 9813	Mango Gummy 100mg 10pk	34 ea.	Product not located	34 ea.

27

28

	METRC TAG ending	Product Description	METRC Inventory	Physical Inventory	Variance
5.	1542	Infused Preroll-Fumeur Rocket-0.5g-Pop Rox	30 ea.	31 ea.	1 ea.

8. Board Agents also observed untagged cannabis product. First, they observed a bin of approximately sixteen (16) Hyve brand shatter 0.5g packages each without METRC tags. Second, they observed another bin of approximately twenty-one (21) Vapen Afternoon 0.5g cartridge packages each without METRC tags. These omissions constitute violations of NCCR 6.082.

9. Board Agents further observed that CLARK D186 failed to package useable cannabis flower sample displays in jars, as required under NCCR 8.010(2).

10. Finally, Board Agents observed that one of CLARK D186's employees on-site, Diego Gutierrez, carried a Temporary Agent Card that expired about four (4) months prior to the July 27, 2021, audit in violation of NCCR 6.087(1).

B. ROUTINE INVESTIGATION ON AUGUST 2, 2021.

11. On or about August 2, 2021, Agent Scott investigated CLARK D186's destruction of cannabis and cannabis product scheduled for July 20, 2021, at CLARK D186's Facility. During her investigation, Agent Scott discovered the following violations.

12. The July 20, 2021, Surveillance Videos ("Surveillance Videos") provided to the CCB show three (3) CLARK D186 employees, who appear to be Arturo Salas ("Mr. Salas") (Agent Card [REDACTED]), Maria D. Navarrete ("Ms. Navarrete ") (Agent Card [REDACTED]), and Ruby Gonzales ("Ms. Gonzalez") (Agent Card [REDACTED]), engaging in the following acts, which constitute violations of NCCR 6.080(7):

a. Throughout the first hour of Surveillance Video, Ms. Navarrete and Ms. Gonzalez can be seen grabbing cannabis and cannabis product marked for destruction in random order, dumping some of these items straight into a trash can lined with a black garbage bag, yet setting other items aside on the desk in the office. Further, said employees can also be seen setting aside cannabis and cannabis products and placing some in a Clear Bin placed out of view from the camera.

b. Throughout the second hour of the Surveillance Video, the aforementioned

1 employees, including Mr. Salas, can be seen setting aside cannabis and cannabis
2 products marked for destruction, and not destroying these products.

3 c. Throughout the third Surveillance Video, which runs about 26 minutes and 12
4 seconds long, Mr. Salas can be seen getting what appears to be bleach and what
5 appears to be fertilizer (or “Miracle-Gro”), pouring both into the black garbage bag
6 containing the cannabis and cannabis products to be destroyed, shaking the bag,
7 and leaving the office with the bleach and garbage bag in hand. Further the
8 employees are seen taking cannabis and cannabis product previously set aside in
9 the office and placed in the Clear Bin. At the end of this third video, none of the
10 cannabis and cannabis product marked for destruction that was either placed into
11 the Clear Bin or set aside in the office is either treated or destroyed on camera.

12 d. Further, despite CLARK D186 either improperly destroying the cannabis and
13 cannabis product or merely setting it aside on July 20, 2021, CLARK D186
14 logged these as destroyed on that date, per the First Destruction Log provided to
15 the CCB as referred to in Paragraph 15 of this Complaint.

16 13. As noted above, the Surveillance Videos camera’s view was partially obscured by
17 a box of paper towels stored on a top shelf in front of the camera. As a result, two (2) of
18 CLARK D186’s employees taking part in the destruction, Mr. Salas and Ms. Gonzales, are
19 not fully visible in most of the Surveillance Videos. This constitutes violations of NCCR
20 6.085 (1)(c)(3) & 6.085 (2). Further, due to the partially obstructed surveillance camera
21 view, Board Agents could not determine the exact number of cannabis and cannabis
22 products CLARK D186 attempted to destroy in the Surveillance Videos.

23 14. Further, as outlined above, from what can be seen in the Surveillance Videos,
24 CLARK D186 failed to follow its own established written Standard Operating Procedures
25 (“SOPs”) for the destruction of cannabis and cannabis products, in violation of NCCR
26 6.075(1)(c). CLARK D186’s SOP 3 & 6(c) outline the procedure for logging items on
27 Destruction Log before destruction, SOP 6(b) outlines the procedure to lay items out evenly
28 on a table in plain view of the camera, SOP 6(d) & 7(b) outlines the use of a food processor

1 in destruction, and SOP 6(f) requires gloves to be worn by employees at all times during
2 destruction.

3 15. Furthermore, CLARK D186 provided a falsified record of a destruction log to the
4 CCB. During the July 27, 2021, Audit, CLARK D186's manager, Gregg Grant ("Mr. Grant")
5 (Agent Card [REDACTED]), provided Board Agents on-site with a six (6) page destruction
6 log dated July 20, 2021 ("First Destruction Log"). CLARK D186 employee Mr. Salas signed
7 this First Destruction Log as the employee who destroyed the product, and Ms. Navarrete
8 signed as the witness to the destruction. However, on July 30, 2021, CLARK D186 emailed
9 a second destruction log to the CCB, also dated July 20, 2021 ("Second Destruction Log"),
10 containing differences from the First Destruction Log. This Second Destruction Log repeats
11 the same eighteen (18) display items and amounts listed in the First Destruction Log.
12 However, it is only one (1) page versus the six (6) pages in length of the First Destruction
13 Log. It indicates two (2) different employees, Ms. Gonzales, as completing the destruction
14 and Mr. Grant as the witness to the destruction. The Surveillance Videos do not show Mr.
15 Grant participating in destruction in any way whatsoever. CLARK D186's Controller, Lisa
16 Vick ("Ms. Vick") (Agent Card [REDACTED]), represented to the CCB that CLARK D186's
17 employees "pre-filled" the First Destruction Log but that the destruction of certain items
18 actually occurred on August 13, 2021, and August 17, 2021.

19 16. Further, Ms. Vick represented to Board Agents that those cannabis and cannabis
20 products which CLARK D186 marked for destruction on July 20, 2021, but allegedly
21 destroyed on August 13 and 17, were harder to destroy. Thus, CLARK D186 separated
22 these items from the initial destruction and did not place them back into the destruction
23 area until CLARK D186 had a way to destroy them. However, CLARK D186 could not
24 provide the CCB with any evidence of the actual destruction of these products due to its
25 own delayed response, in violation of NCCR 6.080(7).

26 17. Finally, Board Agents uncovered that on both the First and Second Destruction
27 Logs CLARK D186 documented three (3) product lines as destroyed on July 20, 2021, but
28 did not reconcile the destruction of these lines in METRC, which constitutes violations of

1 NCCR 6.080 (7), as follows:

- 2 a. METRC Tag 2913, Kalvara 20mg Singles Infused Edible, 9 each, has no
3 corresponding METRC adjustment for destruction.
- 4 b. METRC Tag 9858, Milk Chocolate & Peanut Butter – 100mg H (VERT) 10pk, 1
5 each, METRC listed this product at “0”, finished on June 30, 2021.
- 6 c. METRC Tag 2835, Bond Road Gluechee flower 7g display is listed as “Batch
7 Done,” but adjusted in METRC +17.5 on July 27, 2021, by Ms. Gonzales as “Under
8 Pulled.” CLARK D186 logged the 7g display as destroyed but did not account for
9 destruction in METRC.

10 **VIOLATIONS OF LAW**

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

12 **A. CATEGORY I VIOLATIONS**

13 19. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.035(1)(a)(3), 6.080
14 (7)(a), & 6.080(9) by intentionally making false statements to the CCB. Specifically, as
15 outlined in Paragraphs 12, 15, & 16 above, CLARK D186 provided a falsified record to the
16 CCB because it provided two destruction logs showing different information but purporting
17 to reflect the cannabis and cannabis product destruction that occurred on July 20, 2021,
18 and admitting that certain items marked as destroyed on that date were not destroyed
19 until later. Such a violation, if intentional, constitutes one (1) Category I violation, which
20 carries a civil penalty of not more than \$90,000 and a suspension for not more than thirty
21 (30) days of licenses D186 & RD186. NCCR 4.035(2)(a)(1). Alternatively, this violation, if
22 unintentional, constitutes one (1) Category II violation under NCCR 4.040(1)(a)(1). Such
23 violation carries a civil penalty of not more than \$25,000 and a suspension for not more
24 than twenty (20) days of CLARK D186’s licenses D186 & RD186. NCCR 4.040(2)(a)(1).

25 **B. CATEGORY II VIOLATIONS**

26 20. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.040(1)(a)(14), 6.085
27 (1)(c)(3), & 6.085 (2) when it failed to maintain required surveillance systems and provide
28 unobstructed surveillance video. Specifically, as outlined in Paragraphs 12 & 13 above,

1 CLARK D186 failed to provide unobstructed surveillance video of the destruction of
2 cannabis and cannabis product that was supposed to occur on July 20, 2021, and Board
3 Agents could not determine the exact number of cannabis and cannabis products CLARK
4 D186 attempted to destroy. Such violation constitutes one (1) Category II violation which
5 carries a civil penalty of not more than \$25,000 and a suspension for not more than twenty
6 (20) days of licenses D186 & RD186 under NCCR 4.040(2)(a)(1). Alternatively, if the CCB
7 considers the one (1) violation outlined in Paragraph 19 above as a Category II violation,
8 as the second Category II violation it would carry a civil penalty of not more than \$75,000
9 and a suspension for not more than thirty (30) days of licenses D186 & RD186. NCCR
10 4.040(2)(a)(2).

11 C. CATEGORY III VIOLATIONS

12 21. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.050(1)(a)(14), (27),
13 6.075 (1)(c) & 10.080(3), when it failed to meet the requirements for disposal of cannabis
14 waste, failed to maintain updated SOPs, failed to follow its own established written SOPs
15 for the destruction of cannabis and cannabis related product. First, as outlined in
16 Paragraph 12 above, Surveillance Videos provided showed multiple occurrences of CLARK
17 D186's employees setting aside cannabis and cannabis product designated for destruction
18 on July 20, 2021, and failing to destroy those products on said date. Second, as further
19 outlined in Paragraph 12 above, Surveillance Videos showed CLARK D186's employees
20 merely mixing usable cannabis with what appeared to be bleach and fertilizer and failing
21 to render it unusable as required under the NCCR, and further deviating from its own
22 destruction practices outlined in its own SOP. Such violations constitute at least one (1)
23 Category III violation under NCCR 4.050(2), which carries a civil penalty of \$10,000 under
24 NCCR 4.050(2)(a)(1).

25 22. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.050(1)(a)(3), & 6.080
26 (7), by failing to keep required records, including seed-to-sale tracking requirements, and
27 failing to properly account for inventory using its inventory control system by failing to
28 properly document the disposal of cannabis waste. First, as outlined in Paragraph 7 above,

1 CLARK D186 failed to reconcile the physical inventory of five (5) product lines with what
2 it documented in METRC. Second, as outlined in Paragraph 17 above, CLARK D186
3 documented three (3) product lines as destroyed on July 20, 2021, but did not reconcile such
4 destruction in METRC. Such a violations constitute at least a second Category III violation
5 under NCCR 4.050(2). This second Category III violation carries a civil penalty of \$30,000
6 and/or a suspension of up to ten (10) days. NCCR 4.050(2)(a)(2).

7 23. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.050(1)(a)(22) &
8 6.082(4) when it failed to tag cannabis products. Specifically, as outlined in Paragraph 8
9 above, CLARK D186 failed to individually tag cannabis and cannabis products contained
10 in two (2) separate bins. Such violations constitute at least a third Category III violation
11 under NCCR 4.050(2). This third Category III violation carries a civil penalty of \$90,000
12 and/or a suspension for not more than twenty (20) days. NCCR 4.050(2)(a)(3).

13 **D. CATEGORY IV VIOLATIONS**

14 24. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.055(1)(a)(1) &
15 6.087(1) when it was unable to provide an Agent Card or Temporary Agent Card
16 documentation for an employee. Specifically, as outlined in Paragraph 10 above, one of
17 CLARK D186's employees on-site, Diego Gutierrez, could not provide a current Agent Card,
18 as required. Such a violation constitutes one (1) Category IV violation, carrying a civil
19 penalty of not more than \$5,000 for licenses D186 & RD186 under NCCR 4.055(2)(a)(1).

20 **E. CATEGORY V VIOLATION**

21 25. As to licenses D186 & RD186, CLARK D186 violated NCCR 4.060(1)(a)(6) &
22 8.010(2) when it failed to meet display sample requirements, thereby violating packaging
23 requirements. Specifically, as outlined in Paragraph 9 above, CLARK D186 failed to
24 package useable cannabis flower sample displays in jars, as required. This violation
25 constitutes a Category V violation, which requires a formal warning under NCCR
26 4.060(2)(a)(1).

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1 **DISCIPLINE AUTHORIZED**

2 Pursuant to the provisions of NRS 678A.600, NCCR 4.020, 4.030, 4.035 through
3 4.060, and 5.100, the CCB has the discretion to impose the following disciplinary actions:

- 4 1. Suspend CLARK D186's licenses D186 & RD186 for eighty (80) days, as a result of
5 CLARK D186's violations of NRS Title 56 and the NCCR;
- 6 2. Impose a civil penalty of not more than \$90,000 for CLARK D186's violations of
7 NRS Title 56 and the NCCR; and
- 8 3. Take such other disciplinary action as the CCB deems appropriate.

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

10 **RELIEF REQUESTED**

11 Based on the foregoing, counsel for the CCB respectfully requests the CCB impose
12 civil penalties against CLARK D186 in the amount of \$250,000, a formal warning as to the
13 first Category V violation for licenses D186 & RD186, and suspend licenses D186 & RD186
14 for eighty (80) days.

15 **NOTICE TO RESPONDENT**

16 **PLEASE TAKE NOTICE**, that Respondent has a right to request a hearing on the
17 charges set forth herein, pursuant to NRS 678A.510 through 678A.590. **Failure to**
18 **demand a hearing constitutes a waiver of the right to a hearing and to judicial**
19 **review of any decision or order of the Board, but the Board may order a hearing,**
20 **even if the Respondent so waives its right.** NRS 678A.520(2)(e).

21 **PLEASE TAKE NOTICE**, you, as the Respondent, **must Answer this Complaint**
22 **within twenty (20) days after service of this Complaint, unless granted an**
23 **extension.** Pursuant to NRS 678A.520(2), in the Answer Respondent:

- 24 (a) Must state in short and plain terms the defenses to each claim asserted.
- 25 (b) Must admit or deny the facts alleged in the Complaint.
- 26 (c) Must state which allegations the Respondent is without knowledge or
27 information to form a belief as to their truth. Such allegations shall be deemed denied.
- 28 (d) Must affirmatively set forth any matter which constitutes an avoidance or

1 affirmative defense,

2 (e) May demand a hearing. Failure to demand a hearing constitutes a waiver of the
3 right to a hearing and to judicial review of any decision or order of the Board, but the Board
4 may order a hearing even if the Respondent so waives its right.

5 **Failure to Answer or to appear at the hearing constitutes an admission by the**
6 **Respondent of all facts alleged in the Complaint. The Board may take action**
7 **based on such an admission and on other evidence without further notice to the**
8 **Respondent.** NRS 678A.520(3).

9 The Board shall determine the time and place of the hearing as soon as is reasonably
10 practical after receiving the Respondent's Answer. The Board may assign a hearing officer
11 to conduct the hearing under NCCR 2.070, 4.095, and 4.110. The Board or its assigned
12 hearing officer shall deliver or send by registered or certified mail a notice of hearing to all
13 parties at least ten (10) days before the hearing. The hearing must be held within forty-five
14 (45) days after receiving Respondent's Answer unless an expedited hearing is determined
15 to be appropriate by the Board, in which event the hearing must be held as soon as
16 practicable. NRS 678A.520(4). The Chair of the Board or the assigned hearing officer may
17 grant one or more extensions to the 45-day requirement pursuant to the request of a party
18 or an agreement by both parties.

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

21 Tyler Klimas, Executive Director
22 Cannabis Compliance Board
23 700 E. Warm Springs Rd, Suite 100
Las Vegas, NV 89119
tklimas@ccb.nv.gov

24 If serving its Answer and Request for Hearing via email, Respondent must ensure
25 that it receives an acknowledgement of receipt email from the CCB as proof of service.
26 Respondent is also requested to email a copy of its Answer and Request for Hearing to the
27 Senior Deputy Attorneys General listed below at ebordelove@ag.nv.gov.

28 As the Respondent, you are specifically informed that you have the right to appear

1 and be heard in your defense, either personally or through your counsel of choice at your
2 own expense. At the hearing, the CCB has the burden of proving the allegations in the
3 Complaint. The CCB will call witnesses and present evidence against you. You have the
4 right to respond and to present relevant evidence and argument on all issues involved. You
5 have the right to call and examine witnesses, introduce exhibits, and cross-examine
6 opposing witnesses on any matter relevant to the issues involved.

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

10 If the Respondent does not wish to dispute the charges and allegations set forth
11 herein, within thirty (30) days of the service of this Complaint, Respondent may pay the
12 civil penalties set forth above in the amount of \$250,000 for CLARK D186's licenses D186
13 and license RD186 and cease operations of D186 & RD186 for eighty (80) days on notice
14 to:

15 Tyler Klimas, Executive Director
16 Cannabis Compliance Board
17 700 E. Warm Springs Rd, Suite 100
18 Las Vegas, NV 89119

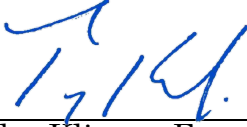
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1 YOU ARE HEREBY ORDERED to immediately cease the activity described above
2 which is a violation of Nevada law.

3 DATED: April 4, 2023.

**STATE OF NEVADA,
CANNABIS COMPLIANCE BOARD**

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5
6 By:


Tyler Klimas, Executive Director
Nevada Cannabis Compliance Board
700 E. Warm Springs Rd, Suite 100
Las Vegas, NV 89119
(775) 687-6299

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11 AARON D. FORD
Attorney General

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13 By:


Emily N. Bordelove (Bar No. 13202)
Senior Deputy Attorney General

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15 Attorneys for the Cannabis Compliance Board
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Cannabis Compliance Board and I have this day served the foregoing Complaint for Disciplinary Action for Clark NMSD, LLC in Case No. 2023-003 to the following:

By electronic mail to:

Brain R. Hardy, Esq., Counsel for Respondent at [REDACTED]

Amanda Connor, Point of Contact for Respondent at [REDACTED]

Service was executed via email to the addresses outlined above pursuant to the attached email wherein counsel for Respondent indicated he was authorized to accept service of this Complaint via e-mail.

Dated at Las Vegas, Nevada this 4th day of April 2023.



Amber Virkler, Executive Assistant

Served and Received on 4th day of April 2023,



Brian R. Hardy Esq.

Subject: RE: CLARK NATURAL MEDICINAL SOLUTIONS, LLC [IWOV-iManage.FID1204368]

From: Brian R. Hardy <[REDACTED]>
Sent: Monday, April 3, 2023 3:21 PM
To: Emily Bordelove <ebordelove@ag.nv.gov>
Cc: Amanda Connor <[REDACTED]>; Luke K. Rath <LRath@ag.nv.gov>
Subject: RE: CLARK NATURAL MEDICINAL SOLUTIONS, LLC [IWOV-iManage.FID1204368]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Emily

I have confirmed with my clients that I have been authorized to accept service. Thank you for Ccing Amanda on all correspondence.

Thanks

Brian



Brian R. Hardy, Esq.



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From: Emily Bordelove <ebordelove@ag.nv.gov>
Sent: Monday, April 3, 2023 1:19 PM
To: Brian R. Hardy <[REDACTED]>
Cc: Amanda Connor <[REDACTED]>; Luke K. Rath <LRath@ag.nv.gov>; Emily Bordelove <ebordelove@ag.nv.gov>
Subject: RE: CLARK NATURAL MEDICINAL SOLUTIONS, LLC [IWOV-iManage.FID1204368]

Hi Brian:

Per our earlier phone call, emailing to get written confirmation that you will accept service through email for the two Complaints for Clark NMSD (D186/RD186) & Clark NMSD (D187/RD187).

Also, per our phone call, the CCB would agree, for these two Complaints only, to allow 30 days from the date of service to file the two Answers. If served today, that would fall on Wednesday, May 3, 2023. If, for some reason, the Complaints get served tomorrow instead, the due date would be May 4, 2023.

Best,

Emily N. Bordelove

Senior Deputy Attorney General, Cannabis Compliance Board
Office of the Nevada Attorney General
555 E. Washington Ave. Ste. 3900
Las Vegas, NV 89101
ebordelove@ag.nv.gov



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