

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

3 STATE OF NEVADA, CANNABIS  
4 COMPLIANCE BOARD,

Case No. 2024-007

5 Petitioner,

6 vs.

7 TWELVE TWELVE, LLC,

8 Respondent.  
9

10 **COMPLAINT FOR DISCIPLINARY ACTION**

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

19 **Jurisdiction**

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

22 <b>ID</b>	<b>License</b>	<b>Last Issued / Renewed</b>	<b>Address</b>
23 C119	Medical Cultivation 04816345591321160151	July 18, 2023	████████████████████ ████████████████████
24 RC119	Adult-use Cultivation 36506856230444373665	September 12, 2023	████████████████████ ████████████████████

25  
26 2. During all relevant times mentioned in this Complaint, TTL 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 TTL as William Moore and Brian Moore.

1 The point of contact with the CCB for TTL is Jeffrey Naseef.

2 3. As TTL holds its licenses with CCB, it is subject to NRS Title 56 and the NCCR  
3 for the violations asserted herein. Therefore, TTL is subject to the jurisdiction of the CCB  
4 and subject to discipline pursuant to NRS 678A through 678D, Chapter 233B of NRS, and  
5 the relevant provisions of the NCCR.

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

16 **Factual Allegations**

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

18 6. Beginning on June 5, 2023, and concluding on October 2, 2023, CCB agents  
19 conducted a routine audit and investigation of TTL's cannabis cultivation facility (the "2023  
20 Audit"). The CCB agents involved in the 2023 Audit were Meiny Trisno and Jordan  
21 Galloway (who may be collectively referred to herein as the "CCB Agents"). During the  
22 2023 Audit, the CCB Agents found multiple violations of the NCCR, as set forth herein.

23 7. First, the CCB Agents found that TTL was operating without a valid local  
24 jurisdiction business license. CCB Agents inquired whether TTL transferred products to  
25 cannabis facilities inside the City of Las Vegas limits and whether TTL was registered for  
26 a business license with the City of Las Vegas. Nicole Mctarsney, TTL's Inventory Manager,  
27 stated they "have not sold to facilities that are in the City of Las Vegas jurisdiction". CCB  
28 Agents also did not observe a City of Las Vegas Business License posted at the TTL facility.  
However, the CCB Agents pulled a Wholesale Transfers Report from METRC (Nevada's

1 required seed-to-sale tracking system) for January 1 through September 30, 2023, which  
2 revealed that, during that time, TTL made a total of 182 transfers and 26 of these were  
3 delivered to cannabis establishments in the City of Las Vegas jurisdiction. Also, the City of  
4 Las Vegas Business Licensing Division online portal did not show TTL as licensed with the  
5 City of Las Vegas. Thus, TTL failed to comply with NCCR 5.100(1)(j) and 4.035(1)(a)(2) by  
6 operating without all required licenses and permits. TTL also violated NCCR 4.040(1)(a)(1)  
7 by, at the least, making an unintentional false statement or misrepresentation of fact to a  
8 Board Agent.

9 8. Second, the CCB Agents observed that TTL's surveillance cameras located at  
10 its parking lot and Veg Room Door were not functioning because they only displayed blue  
11 screens on the call-up monitor. Board Agents inquired whether TTL notified the Board of  
12 the security camera malfunctions and Nicole Mctarsney, TTL's Inventory Manager,  
13 responded that no incident reports were ever submitted to the Board. In addition, TTL was  
14 not able to provide a security malfunction log, as required under NCCR 6.085(5). Also,  
15 seven security cameras were obstructed and had inadequate coverage, in violation of NCCR  
16 6.085(2)(b). Thus, TTL violated NCCR 6.085(2), (3) & (5) and 4.040(1)(a)(14).

17 9. Third, the CCB Agents found multiple violations of seed-to-sale tracking  
18 requirements<sup>1</sup>, including the following:

19 (1) The CCB Agents requested clone logs for 30 days. The clone logs TTL  
20 provided documented a total of 11 clone batches created on May 18, 2023,  
21 and June 2, 2023. However, METRC recorded 30 clone batches created  
22 during the requested period. Logs for the remaining 19 clone batches were  
23 not provided. This is a violation of NCCR 6.080(7)(d) & (8).

24 (2) The harvest logs TTL provided did not document the final yield weight of  
25 usable cannabis in grams. This is a violation of NCCR 6.080(7)(d)(8)(II).

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27 <sup>1</sup> The CCB also conducted a routine audit of TTL on June 10, 2022. During that prior audit, other CCB agents  
28 also found several violations of seed-to-sale tracking requirements. No disciplinary complaint was filed as a  
result of those findings. However, TTL was advised of these deficiencies via a Statement of Deficiencies Letter  
the CCB sent to TTL on October 14, 2022 (the "October 2022 SOD").

1 (3) Six entries from TTL's in process packaging log were untimely recorded in  
2 METRC and what was recorded in METRC showed variances in the  
3 weight from the weights recorded in the packaging log. This is a violation  
4 of 6.080(8).

5 In addition to the aforementioned regulations, the above acts and omissions are also a  
6 violation of NCCR 4.050(1)(a)(3).

7 10. Fourth, TTL failed to meet the requirements for disposal of cannabis waste<sup>2</sup>,  
8 in violation of NCCR 4.050(1)(a)(14). Specifically, the CCB Agents found the following:

9 (1) The plant destruction log and the veg and bloom rooms waste logs that  
10 TTL provided did not document confirmation that the cannabis was  
11 rendered unusable prior to disposal, as required under NCCR  
12 6.080(7)(d)(9)(III).

13 (2) TTL's plant destruction log documented that a total of 0.32 pounds of  
14 plants were destroyed under METRC tags 26784, 27548, and 27566;  
15 however, the plant waste recorded in METRC for these plants was 30.2  
16 pounds, a variance of almost 30 pounds, a violation of NCCR 6.080(8).

17 (3) The veg and bloom rooms waste logs similarly documented disposal entries  
18 that did not match the disposal weight recorded in METRC, showing a  
19 variance of 0.94 pounds, a violation of NCCR 6.080(8).

20 (4) The CCB agents found that TTL's packaging and waste log did not  
21 document confirmation that the cannabis was rendered unusable before  
22 disposal (a violation of 6.080(7)(d)(9)(III)), did not document the method of  
23 disposal (a violation of 6.080(7)(d)(9)(IV)), and did not designate the name  
24 and the number of the cannabis establishment agent registration card of  
25 the cannabis establishment agent responsible for the disposal (a violation  
26 of 6.080(7)(d)(9)(V)).  
27

28 <sup>2</sup> The aforementioned audit of June 10, 2022, also found violations concerning disposal of cannabis waste, as set forth in the October 2022 SOD.

1 11. Fifth, the CCB Agents found that one of TTL's owners, Brian Matthew Moore,  
2 lacked a valid cannabis establishment agent card, in violation of NCCR 6.087(2)(a).  
3 Specifically, Mr. Moore's agent card, [REDACTED] expired on February 11, 2023, and he  
4 did not submit a new application until October 18, 2023. This is also a violation of NCCR  
5 4.055(1)(a)(1).

6 12. Sixth, the CCB Agents found that TTL failed to submit required inventory  
7 and sales reports to the CCB<sup>3</sup>, as follows:

8 (1) TTL failed to submit quarterly physical inventory reports to the CCB for  
9 C119 for Quarter 4 of 2021 through Quarter 2 of 2023, in violation of NCCR  
10 6.080(8)(c) and 4.060(1)(a)(7).

11 (2) TTL failed to submit quarterly physical inventory reports to the CCB for  
12 RC119 for Quarter 4 of 2021 through Quarter 2 of 2023, in violation of  
13 NCCR 6.080(8)(c) and 4.060(1)(a)(7).

14 (3) TTL failed to submit its quarterly reports for monthly sales, as required  
15 under NCCR 6.135 and 4.060(1)(a)(7) for C119 for Quarter 4 of 2021  
16 through Quarter 2 of 2023.

17 (4) TTL failed to submit its quarterly reports for monthly sales, as required  
18 under NCCR 6.135 and 4.060(1)(a)(7) for C119 for Quarter 4 of 2021  
19 through Quarter 2 of 2023.

20 13. Seventh, the CCB Agents found that TTL failed to maintain a visitor log as  
21 required under NCCR 6.070(6)<sup>4</sup>. Specifically, two entries in the visitor logs for April 21 –  
22 June 7, 2023, did not list the specific purpose for the visit, and two entries for the visitor  
23 log for September 28, 2023, did not document the time of departure.

24 **Violations of Law**

25 14. CCB incorporates all prior Paragraphs as though fully set forth herein.  
26

27 <sup>3</sup> Again, the aforementioned audit of June 10, 2022, also found violations concerning the failure to submit  
required sales reports, as set forth in the October 2022 SOD.

28 <sup>4</sup> Again, the aforementioned audit of June 10, 2022, also found TTL kept improper and deficient visitor logs,  
as set forth in the October 2022 SOD. Thus, TTL was aware of its lack of compliance in 2022 and repeated  
multiple violations again, as set forth in this Complaint.

1           15. As to licenses C119 and RC119, Respondent TTL violated NCCR 4.035(1)(a)(2)  
2 and 5.100(1)(j) by operating without all required licenses and permits. Specifically, as  
3 detailed in Paragraph 7, above, the TTL facility did business within the limits of the City  
4 of Las Vegas without a City of Las Vegas business license. The foregoing acts and omissions  
5 constitute one Category I violation, which carries a civil penalty of not more than \$20,000  
6 and a suspension of licenses for not more than 30 days, or a revocation of licenses. NCCR  
7 4.035(2)(a)(1)<sup>5</sup>. However, the CCB seeks only a civil penalty of \$20,000 for this violation  
8 without any revocation or suspension.

9           16. As to licenses C119 and RC119, Respondent TTL violated NCCR 4.040(1)(a)(1)  
10 by making, at the least, an unintentional false statement or false representation of fact to  
11 a CCB agent. Specifically, as detailed in Paragraph 7, above, TTL's inventory manager  
12 falsely stated that TTL did not do business within the limits of the City of Las Vegas, when  
13 it, in fact, did. This act/omission constitutes one Category II violation, which carries a civil  
14 penalty of up to \$20,000 and a suspension of up to 20 days. NCCR 4.040(2)(a)(1)<sup>6</sup>. However,  
15 the CCB seeks only a civil penalty of \$10,000 for this violation without any suspension.

16           17. As to licenses C119 and RC119, Respondent TTL violated NCCR  
17 4.040(1)(a)(14) and 6.085(2), (3), and (5) by failing to maintain required surveillance  
18 systems. Specifically, as detailed in Paragraph 8, above, multiple security cameras were  
19 non-functional, TTL did not keep a security malfunction log, TTL did not report security  
20 camera malfunctions to the CCB, and seven security cameras were obstructed or had  
21 inadequate coverage. These acts and omissions constitute a second Category II violation,  
22 which carries a civil penalty of up to \$20,000 and a suspension of up to 30 days. NCCR  
23 4.040(2)(a)(2)<sup>7</sup>. However, the CCB seeks only a civil penalty of \$20,000 for this violation  
24 without any suspension.

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26 <sup>5</sup> Although NCCR 4.035(2)(a)(1) currently references a civil penalty of up to \$90,000, SB 195, Sec. 7, caps civil  
27 penalties at \$20,000 per violation.

<sup>6</sup> Although NCCR 4.040(2)(a)(1) currently references a civil penalty of up to \$25,000, SB 195, Sec. 7, caps civil  
28 penalties at \$20,000 per violation.

<sup>7</sup> Although NCCR 4.040(2)(a)(2) currently references a civil penalty of up to \$75,000, SB 195, Sec. 7 caps civil  
penalties at \$20,000 per violation.

1 18. As to licenses C119 and RC119, Respondent TTL violated NCCR  
2 4.050(1)(a)(3), and 6.080(7), and (8) by failing to follow seed-to-sale tracking requirements.  
3 Specifically, as detailed in Paragraph 9, above, TTL failed to follow multiple seed-to-sale  
4 tracking requirements set forth in the NCCR. These acts and omissions constitute one  
5 Category III violation, which carries a civil penalty of up to \$10,000. NCCR 4.050(2)(a)(1).  
6 The CCB seeks a civil penalty of \$7,500 for this violation.

7 19. As to licenses C119 and RC119, Respondent TTL violated NCCR  
8 4.050(1)(a)(14) by failing to meet the requirements for disposal of cannabis waste.  
9 Specifically, as detailed in Paragraph 10, above, TTL failed to properly complete disposal  
10 logs as required and had multiple discrepancies between its disposal logs and cannabis  
11 waste recorded in METRC. These acts and omissions constitute a second Category III  
12 violation, which carries a civil penalty of up to \$20,000, and/or a suspension of up to 10  
13 days. NCCR 4.050(2)(a)(2)<sup>8</sup>. The CCB seeks a civil penalty of \$15,000 for this violation.

14 20. As to licenses C119 and RC119, Respondent TTL violated NCCR  
15 4.055(1)(a)(1) and 6.087(2)(a) because one of its owners failed to have a valid cannabis  
16 establishment owner agent card, as detailed in Paragraph 11, above. This omission  
17 constitutes a Category IV violation, which carries a civil penalty of up to \$5,000. NCCR  
18 4.055(2)(a)(1). The CCB seeks a civil penalty of \$5,000 for this violation.

19 21. As to licenses C119 and RC119, Respondent TTL violated NCCR  
20 4.060(1)(a)(7), 6.080(8), and 6.175, by failing to timely submit required inventory and sales  
21 reports, as detailed in Paragraph 12, above. These acts and omissions constitute one  
22 Category V violation, which requires a formal warning. The CCB seeks a formal warning  
23 from the Board for these violations.

24 22. As to licenses C119 and RC119, Respondent TTL violated NCCR 4.060(1)(a)(6)  
25 and 6.070(6) by failing to maintain proper visitor logs. These acts and omissions constitute  
26 a second Category V violation, which carries a civil penalty of \$2,500. NCCR 5.060(2)(a).

27 \_\_\_\_\_  
28 <sup>8</sup> Although NCCR 4.050(2)(a)(2) currently references a civil penalty of up to \$30,000, SB 195, Sec. 7, caps civil penalties at \$20,000 per violation.

1 The CCB seeks a civil penalty of \$2,500 for this violation.

2 **DISCIPLINE AUTHORIZED**

3 Pursuant to the provisions of NRS 678A.600, NCCR 4.020, 4.030, 4.035 through  
4 4.060, and 5.100, the CCB has the discretion to impose the following disciplinary actions:

- 5 1. Revoke the cultivation licenses of TTL;
- 6 2. Suspend the cultivation licenses of TTL;
- 7 3. Impose a civil penalty of not more than \$20,000 for each separate violation of  
8 NRS Title 56 and the NCCR on the cultivation licenses of TTL; and
- 9 4. Take such other disciplinary action as the CCB deems appropriate.

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

11 **RELIEF REQUESTED**

12 Based on the foregoing, counsel for the CCB respectfully requests the CCB impose  
13 civil penalties against TTL in the amount of \$80,000, and a written warning regarding  
14 TTL's first Category V violation, for licenses C119 and RC119. Counsel for the CCB does  
15 **not** request the suspension or revocation of said licenses.

16 **NOTICE TO RESPONDENT**

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

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

- 25 (a) Must state in short and plain terms the defenses to each claim asserted.
- 26 (b) Must admit or deny the facts alleged in the complaint.
- 27 (c) Must state which allegations the respondent is without knowledge or information  
28 form a belief as to their truth. Such allegations shall be deemed denied.



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

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

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

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

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

23 James Humm, Executive Director  
24 Cannabis Compliance Board  
25 700 East Warm Springs Road, Ste. 100  
26 Las Vegas, Nevada 89119  
27 [jhumm@ccb.nv.gov](mailto:jhumm@ccb.nv.gov)

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

1 [lrath@ag.nv.gov](mailto:lrath@ag.nv.gov).

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

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

13 If the Respondent does not wish to dispute the charges and allegations set forth  
14 herein, within 30 days of the service of this Complaint, Respondent may pay the requested  
15 civil penalties set forth above in the total amount of \$80,000, on notice to:  
16

17 James Humm, Executive Director  
18 Cannabis Compliance Board  
19 700 East Warm Springs Road, Ste. 100  
Las Vegas, Nevada 89119

20 Respondent is further notified and informed that, pursuant to S.B. 195 Sec. 2, 2023  
21 Leg., 82th Sess. (Nv. 2023) and NRS 233B.121(5), Respondent, individually or through  
22 counsel, may, at any time, enter into settlement negotiations to potentially resolve this  
23 matter via a settlement agreement, subject to Board approval. Should Respondent desire  
24 to attempt to resolve this matter via a settlement agreement, Respondent (or its counsel, if  
25 Respondent is represented) should contact the Senior Deputy Attorney General listed  
26 below via email at [lrath@ag.nv.gov](mailto:lrath@ag.nv.gov).  
27  
28


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

3 DATED: April 22, 2024.

4 STATE OF NEVADA, CANNABIS COMPLIANCE BOARD

5 By:   
6 James Humm, Executive Director  
7 Cannabis Compliance Board  
8 700 East Warm Springs Road, Ste. 100  
9 Las Vegas, Nevada 89119

10  
11 AARON D. FORD  
12 Attorney General

13 By:   
14 L. Kristopher Rath (Bar No. 5749)  
15 Senior Deputy Attorney General  
16 555 E. Washington Ave, Suite 3900  
17 Las Vegas, Nevada 89101  
18 (702) 486-3420

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

I, Amber Powell, 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: Jeff Naseef

Address on file with CCB: [REDACTED]

Date of Service: April 26, 2024

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

Executed on April 26, 2024  
(date)

  
(signature)

Carbon Copy:  
[REDACTED]

Via First Class Mail  
Sent via email to: [REDACTED]