

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

3 STATE OF NEVADA, CANNABIS
4 COMPLIANCE BOARD,

Case No. 2024-015

5 Petitioner,

6 vs.

7 GWGA, 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 GWGA, LLC ("GWGA" or "Respondent") has violated provisions of Chapters
15 678A through 678D of the Nevada Revised Statutes ("NRS"), and the Nevada Cannabis
16 Compliance Regulations ("NCCR"), hereby issues its Complaint, stating the CCB's charges
17 and allegations as follows:
18

19 **Jurisdiction**

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

22 ID	License	Last Issued / Renewed	Address
23 C024	Medical & Adult-use Cultivation	June 30, 2024 ¹	[REDACTED]
24	[REDACTED]		

25
26 2. During all relevant times mentioned in this Complaint, GWGA is and was
27

28 ¹ At the time of the violations alleged herein, GWGA held separate licenses for medical cannabis (C024) and adult-use cannabis (RC024). Under NRS 678B.215, when these licenses were renewed in 2024, they combined to form one medical and adult-use license with establishment identification No. C024.

1 registered as a Domestic Limited Liability Company in the State of Nevada. The Nevada
2 Secretary of State lists the managing member of GWGA as Sandra Tiffany. The point of
3 contact with the CCB for GWGA is also Sandra Tiffany.

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

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

18 Factual Allegations

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

20 6. On or about December 19, 2023, CCB agents conducted a routine inspection
21 and investigation of GWGA's cannabis cultivation facility (the "2023 Inspection"). The CCB
22 agents involved in the 2023 Inspection were Alana Holt-Hall and Michelle Courtney (who
23 may be collectively referred to herein as the "CCB Agents"). During the 2023 Inspection,
24 the CCB Agents found multiple violations of the NCCR, as set forth herein.

25 7. First, the CCB Agents observed that GWGA employees failed to properly wash
26 their hands prior to processing cannabis, in violation of NCCR 6.090(1)(a) and 6.092.
27 Specifically, the CCB Agents observed GWGA employees spraying their hands with
28 isopropyl alcohol only, instead of meeting all the requirements for hand washing before

1 entering the facility's trim room to handle cannabis.

2 8. Second, the CCB Agents found that GWGA failed to meet the requirements
3 for disposal of cannabis waste in violation of NCCR 10.080(3). Specifically, the CCB Agents
4 observed that the facility failed to properly render cannabis unusable by grinding and
5 incorporating waste², and green waste was found co-mingled with other trash.

6 9. Third, the CCB Agents found that GWGA failed to provide a designated
7 handwashing sink as required under NCCR 6.095(1)(b). Specifically, the CCB Agents
8 observed no sink designated for handwashing only and located outside of a restroom. There
9 was a three-compartment sink labeled as a hand washing station but it was also used for
10 other purposes. Three-compartment sinks are used for washing, rinsing, and sanitizing
11 utensils and equipment. Those sinks must be maintained for that purpose and the facility
12 is required to have a separate sink dedicated to hand washing only.

13 10. Fourth, the CCB Agents found that GWGA failed to properly use sanitizer as
14 required. Specifically, the facility did not possess appropriate test strips and used an
15 unapproved sanitizer, in violation of NCCR 10.040, NCCR 9.055 and NCCR 4.055(1)(a)(12).
16 There were no appropriate test strips for SaniDate, Zeretol, and bleach. The Quat test
17 strips were only located at the three-compartment sink, which was also used for hand
18 washing. The sanitizer used for sanitizing equipment (SaniDate) was not approved for food
19 contact. Also, GWGA failed to properly sanitize tables in its veg room. It used only
20 isopropyl alcohol or water to wipe down and clean those tables.

21 11. Fifth, the CCB Agents observed both dead and alive insects, spiders, and
22 centipedes inside the facility, in violation of NCCR 4.055(1)(a)(11).

23 12. Sixth, the CCB agents found that GWGA failed to take measures to prevent
24 contamination, in violation of NCCR 10.055(2)(a). Specifically, the CCB Agents observed a
25 dehumidifier outlet tube resting on a grow table amongst plants, and a restroom door
26 propped open when not in use³.

27 ² According to GWGA employees, all cannabis waste was destroyed by pouring bleach on the cannabis, rather
28 than rendering cannabis unusable by grinding and incorporating non-compostable mixed waste.

³ This restroom door had a self-closing mechanism that GWGA disabled on purpose to keep that door open
when not in use.

1 13. Seventh, the CCB Agents found multiple building disrepair issues, in violation
2 of NCCR 10.060, including the following:

- 3 a. Excessive buildup of debris in the hallway, corners, and other
4 locations.
- 5 b. Algae like substances observed in water bins and water/nutrient
6 tubes.
- 7 c. Peeling floors throughout the facility.
- 8 d. A large crack in a hallway floor.

9 Violations of Law

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

11 15. As to license C024, Respondent GWGA violated NCCR 4.050(1)(a)(20), NCCR
12 6.090(1)(a), and 6.092, by failing to comply with requirements for hand washing and
13 employee hygiene. Specifically, as detailed in Paragraph 7, above, employees at the GWGA
14 facility failed to comply with hand washing requirements by simply spraying their hands
15 with isopropyl alcohol only, without meeting all requirements for handwashing prior to
16 handling cannabis. The foregoing acts and omissions constitute one Category III violation,
17 which carries a civil penalty of not more than \$10,000. NCCR 4.050(2)(a)(1). However, the
18 CCB seeks only a civil penalty of \$7,500 for this violation.

19 16. As to license C024, Respondent GWGA violated NCCR 4.050(1)(a)(14) and
20 NCCR 10.080(3) by failing to meet the requirements for the disposal of cannabis waste.
21 Specifically, as detailed in Paragraph 8, above, employees at the GWGA facility failed to
22 properly render cannabis unusable by grinding and incorporating waste, and green waste
23 was found co-mingled with other trash. The foregoing acts and omissions constitute a
24 second Category III violation, which carries a civil penalty of not more than \$20,000⁴ and/or
25 a suspension of not more than 10 days. NCCR 4.050(2)(a)(2). However, the CCB seeks only
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28 ⁴ Although NCCR 4.050(2)(a)(2) currently references a civil penalty of up to \$30,000, NRS 678A.600(1)(b) (as amended in 2023) states that the Board may not impose a civil penalty exceeding \$20,000 for a single violation.

1 a civil penalty of \$15,000 for this violation without any suspension.

2 17. As to license C024, Respondent GWGA violated NCCR 4.055(1)(a)(10) and
3 NCCR 6.095(1)(b) by failing to maintain hand washing facilities that are limited to hand
4 washing only. Specifically, as detailed in Paragraph 9, above, the single sink designated
5 for hand washing was used for other purposes, as well. This omission constitutes a Category
6 IV violation, which carries a civil penalty of \$5,000. NCCR 4.055(2)(a)(1). However, the
7 CCB seeks only a civil penalty of \$3,000 for this violation.

8 18. As to license C024, Respondent GWGA violated NCCR 4.055(1)(a)(12),
9 4.055(1)(a)(9), NCCR 9.055, and NCCR 10.040, by failing to properly use sanitizer as
10 required and failing to properly sanitize product contact surfaces. Specifically, as set forth
11 in Paragraph 10, above, GWCA did not possess the appropriate test strips and used an
12 unapproved sanitizer. Also, GWGA failed to properly sanitize tables in its veg room. These
13 acts and omissions constitutes a second Category IV violation, which carries a civil penalty
14 of \$10,000 and/or a suspension of not more than 7 days. NCCR 4.055(2)(a)(2). However,
15 the CCB seeks only a civil penalty of \$6,000 for this violation without any suspension.

16 19. As to license C024, Respondent GWGA violated NCCR 4.055(1)(a)(11) by
17 allowing for an infestation of pests that are not multigenerational, as detailed in Paragraph
18 11, above. CCB Agents found a number of living and dead insects, spiders, and centipedes.
19 These acts and omissions constitute a third Category IV violation, which carries a civil
20 penalty of \$20,000 and a suspension of not more than 10 days. NCCR 4.055(2)(a)(3).
21 However, the CCB seeks only a civil penalty of \$9,000 for this violation without any
22 suspension.

23 20. As to license C024, Respondent GWGA violated NCCR 4.060(1)(a)(6) and
24 NCCR 10.055(2)(a) when it failed to take steps designed to prevent contamination.
25 Specifically, as detailed in Paragraph 12, above, GWGA maintained a dehumidifier tube
26 resting on a grow table amongst plants and a restroom door propped open when not in use.
27 These acts and omissions constitute a Category V violation, which carries requires a
28 warning from the CCB. NCCR 4.060(2)(a)(1). The CCB therefore requests the Board issue

1 a formal warning to GWGA as to this violation.

2 21. As to license C024, Respondent GWGA violated NCCR 4.060(1)(a)(6) and
3 NCCR 10.060 when it allowed multiple issues of building disrepair, as set forth in detail in
4 Paragraph 13, above. These acts and omissions constitute at least one Category V
5 violation, which is a second Category V violation and carries a civil penalty of \$2,500.
6 NCCR 4.060(2)(a)(2). The CCB seeks a civil penalty of \$2,500 for these violations.

7 **DISCIPLINE AUTHORIZED**

8 Pursuant to the provisions of NRS 678A.600, NCCR 4.020, 4.030, 4.035 through
9 4.060, and 5.100, the CCB has the discretion to impose the following disciplinary actions:

- 10 1. Revoke the cultivation licenses of GWGA;
11 2. Suspend the cultivation licenses of GWGA;
12 3. Impose a civil penalty of not more than \$20,000 for each separate violation of
13 NRS Title 56 and the NCCR on the cultivation licenses of GWGA; and
14 4. Take such other disciplinary action as the CCB deems appropriate.

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

16 **RELIEF REQUESTED**

17 Based on the foregoing, counsel for the CCB respectfully requests the CCB impose
18 civil penalties against GWGA in the amount of \$43,000, and issue a formal, written
19 warning regarding GWGA's first Category V violation, for license C024. Counsel for the
20 CCB does not request the suspension or revocation of said license.

21 **NOTICE TO RESPONDENT**

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

27 **PLEASE TAKE NOTICE**, you, as the Respondent, **must answer this Complaint**
28 **within 20 days after service of this Complaint**, unless granted an extension under

1 NRS 678A.520(2). Pursuant to NRS 678A.520(2), in the answer Respondent:

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

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

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

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

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

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

16 The Board shall determine the time and place of the hearing as soon as is reasonably
17 practical after receiving the Respondent's answer. The Board may assign a hearing officer
18 to conduct the hearing under NCCR 2.070 and 4.095. The Board or its assigned hearing
19 officer shall deliver or send by registered or certified mail a notice of hearing to all parties
20 at least 10 days before the hearing. The hearing must be held within 45 days after receiving
21 the respondent's answer unless an expedited hearing is determined to be appropriate by
22 the Board, in which event the hearing must be held as soon as practicable. NRS
23 678A.520(4). The Chair of the Board or the assigned hearing officer may grant one or more
24 extensions to the 45-day requirement pursuant to the request of a party or an agreement
25 by both parties. NRS 678A.520(4).

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

3 James Humm, Executive Director
4 Cannabis Compliance Board
5 700 East Warm Springs Road, Ste. 100
6 Las Vegas, Nevada 89119
7 jhummm@ccb.nv.gov

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

12 As the Respondent, you are specifically informed that you have the right to appear
13 and be heard in your defense, either personally or through your counsel of choice at your
14 own expense. At the hearing, the CCB has the burden of proving the allegations in the
15 Complaint by a preponderance of the evidence. NCCR 4.120; NRS 233B.0375. The CCB
16 will call witnesses and present evidence against you. You have the right to respond and to
17 present relevant evidence and argument on all issues involved. You have the right to call
18 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any
19 matter relevant to the issues involved.

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

23 If the Respondent does not wish to dispute the charges and allegations set forth
24 herein, within 30 days of the service of this Complaint, Respondent may pay the requested
25 civil penalties set forth above in the total amount of \$43,000, on notice to:

26 James Humm, Executive Director
27 Cannabis Compliance Board
28 700 East Warm Springs Road, Ste. 100
Las Vegas, Nevada 89119

1 Respondent is further notified and informed that, pursuant to NRS 678A.645,
2 Respondent, individually or through counsel, may, at any time, enter into settlement
3 negotiations to potentially resolve this matter via a settlement agreement, subject to Board
4 approval. Should Respondent desire to attempt to resolve this matter via a settlement
5 agreement, Respondent (or its counsel, if Respondent is represented) should contact the
6 Senior Deputy Attorney General listed below via email at lrath@ag.nv.gov.
7

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

10 DATED: September 23rd 2024.

11 STATE OF NEVADA, CANNABIS COMPLIANCE BOARD

12
13 By: 
14 James Humm, Executive Director
15 Cannabis Compliance Board
16 700 East Warm Springs Road, Ste. 100
17 Las Vegas, Nevada 89119

18 AARON D. FORD
19 Attorney General

20 By: 
21 L. Kristopher Rath (Bar No. 5749)
22 Senior Deputy Attorney General
23 555 E. Washington Ave, Suite 3900
24 Las Vegas, Nevada 89101
25 (702) 486-3420

26 Attorneys for the Cannabis Compliance Board
27
28

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 GWGA LLC C024 as follows:

By electronic mail to:

Sandra Tiffany at sandratiffany@aol.com

Sent via Certified Mail to:

70203160000003147110

GWGA LLC

2720 Bayo Ct

Las Vegas NV 89102

Dated at Las Vegas, Nevada, this 23 day of September 2024.



Amber Powell, Executive Assistant