

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

3
4 STATE OF NEVADA, CANNABIS
COMPLIANCE BOARD,

Case No. 2025-001

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 cannabis license:

22 ID	License	Expiration Date	Address
23 P097	24 Medical & Adult-use 25 Production 26 10204272765771786596	27 February 28, 28 2025 ¹	

2. During all relevant times mentioned in this Complaint, GHC is and was

1 At the time of some of the violations alleged herein, GHC held separate licenses for medical cannabis (P097) and adult-use cannabis (RP097). 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. P097.

1 registered as a Domestic Limited Liability Company in the State of Nevada. The Nevada
2 Secretary of State lists the managing members of GHC as: Jason S. Ching, Steven J. Lopez,
3 and Daniel C. Caravette. The point of contact with the CCB for GHC is Daniel C.
4 Caravette.

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

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

19 Factual Allegations

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

22 6. By way of background, on or about February 28, 2023, the CCB filed and
23 served a complaint for disciplinary action against GHC, CCB Case No. 2023-01 (the "2023
24 Complaint"). The 2023 Complaint arose from a CCB audit/inspection and investigation
25 which took place during February through April 2022. The 2023 Complaint alleged, *inter*
26 *alia*, that, contrary to Nevada law, the GHC medical and adult-use cannabis production
27 facility (P097 and RP097): (1) failed to immediately admit regulatory personnel into its
28 premises and obstructed regulatory personnel from performing their duties; (2) failed to

1 comply with seed-to-sale tracking requirements multiple times and in three different ways
2 (production logs did not match METRC data; physical inventory discrepancies with
3 METRC data; and improper use of METRC tags); (3) failed to properly tag cannabis and
4 cannabis products as required; (4) failed to properly respond to a Board agent's request for
5 video surveillance footage; (5) failed to timely notify the CCB of changes in the employment
6 status of 13 of its cannabis establishment agents; and (6) failed to timely submit required
7 reports to the Board.

8 7. The 2023 Complaint was resolved via a settlement agreement which the
9 Board approved on October 24, 2023 (the "2023 Settlement").

10 8. In the 2023 Settlement, GHC admitted it committed the following five
11 violations:

- 12 a. One violation of NCCR 4.050(1)(a)(3) for failing to comply with seed-to-
13 sale tracking requirements, which constitutes one Category III
14 violation.
- 15 b. One violation of NCCR 4.050(1)(a)(23) for failing to comply with
16 cannabis tagging requirements, which constitutes a second Category
17 III violation.
- 18 c. One violation of NCCR 4.050(1)(a)(7) for allowing activity which
19 violates the laws of this State, which constitutes a third Category III
20 violation.
- 21 d. One violation of NCCR 4.055(1)(a)(14) for failing to properly respond to
22 a Board Agent's request for video, which constitutes a Category IV
23 violation.
- 24 e. One violation of NCCR 4.060(1)(a)(7) for failing to submit reports
25 required by the Board, which constitutes a Category V violation.

26 9. As to the remaining allegations in the 2023 Complaint, GHC neither admitted
27 nor denied those allegations. GHC was assessed a \$50,000 civil penalty to be paid in
28 installments over 11 months. With requested and granted extensions, the last installment

1 was due to be paid on December 16, 2024, and the CCB received said payment on December
2 18, 2024, within the grace period for payment.

3 10. Commencing on May 18, 2023, and concluding on August 11, 2023, the CCB
4 conducted its routine audit of 2023 for GHC (the “2023 Audit”). The CCB Agents for this
5 Audit were Meiny Trisno, Marvin Taylor, and Anissa Acfalle (hereinafter referenced as
6 “2023 CCB Agents”). The 2023 CCB Agents initiated the 2023 Audit on May 18, 2023, by
7 requesting GHC submit standard documents on the Audit Document Request Checklist by
8 May 25, 2023. By May 30, 2023, the 2023 CCB Agents had received nothing from GHC, so
9 they sent a follow-up email and made a telephone call to Daniel Caravette (“Mr.
10 Caravette”), the designated point of contact with the CCB and an owner of GHC. Mr.
11 Caravette claimed the original email went to his spam folder and requested an extension
12 to June 2, 2023, which was granted. On June 2, 2023, GHC produced some of the requested
13 documents, though was missing others.

14 11. Review of the documents that were provided on June 2, 2023, revealed
15 multiple regulatory violations as follows:

- 16 a. The facility failed to provide the employee hiring file and training
17 manual, as requested.
- 18 b. The facility failed to provide the requested security surveillance system
19 screen prints of all entrances, exits, vaults, and other rooms.
- 20 c. The facility failed to report the information necessary for CCB to
21 remotely access video surveillance footage, as required under NCCR
22 6.085(1)(c)(3)(III).
- 23 d. The facility failed to submit to the CCB monthly inventory reports and
24 sales reports on a quarterly basis². Specifically, GHC failed to submit
25 quarterly inventory reports for the entirety of 2021 and 2022, and had
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27 ² Quarterly monthly sales reports and quarterly inventory reports are necessary to reconcile a cannabis
28 establishment’s monthly sales and inventory reported in METRC, Accela, and with the Sales and Use Tax
Returns submitted to the Nevada Department of Taxation. Without these reports, the CCB cannot complete
a proper audit of a cannabis establishment. Licensees are required to upload these reports into Accela, the
system the CCB uses for licensees to upload required documents.

1 not submitted any quarterly inventory reports for 2023. This was due
2 to the fact that GHC had consistently failed to conduct quarterly
3 physical inventory counts pursuant to NCCR 6.080(8)(c). As a result,
4 it eventually became impossible for GHC to prepare any quarterly
5 inventory reports for 2021 through 2023.

6 e. The facility failed to maintain a proper visitor log, as the purpose of the
7 visit was not recorded in its visitor log.

8 f. The facility failed to adhere to the limitations on lot sizes for 7
9 production runs, one of which exceeded lot size by over 17 times.

10 12. On June 13 and June 29, 2023, the 2023 CCB Agents conducted a field audit
11 of GHC. On June 13, 2023, the 2023 CCB Agents were unable to access the site and
12 contacted Michelle Norgard (“Ms. Norgard”), the Designated Inventory Manager, who told
13 the 2023 CCB agents that she would contact someone to allow entry. Hearing nothing
14 thereafter, the 2023 CCB Agents followed up with Ms. Norgard on June 23, 2023, who again
15 told them she would arrange for a time for them to enter the facility. Hearing nothing after
16 that, on June 28, 2023, the 2023 CCB Agents sent a demand email regarding scheduling
17 entry to the facility within 24 hours. Only after that, GHC finally responded and confirmed
18 a date and time for the walkthrough. This is exactly the same issue the CCB experienced
19 with GHC during the 2022 audit, when the CCB Agents then were unable to immediately
20 access the facility and GHC obstructed their investigation.

21 13. In performing their facility walkthrough on June 29, 2023, an employee of
22 GHC, incorrectly informed the 2023 CCB Agents that the facility was non-operational. No
23 additional violations were found at that time.

24 14. On August 11, 2023, the CCB sent GHC a Statement of Deficiencies Letter
25 itemizing all the regulatory violations set forth above and providing GHC an opportunity
26 to correct the violations by submitting a written plan of correction within 10 business days
27 (the “2023 SOD”).

28 15. Thereafter, GHC spent the next 5 months delaying providing an adequate

1 plan of correction and never did provide or submit the requested inventory reports.
2 Specifically, on August 29, 2023, the CCB received GHC's proposed Plan of Correction;
3 however, it failed to address all of the violations set forth in the 2023 SOD. It disagreed
4 with the finding that access to the facility was denied and that it was inactive. As to the
5 remaining violations, the Plan of Correction did not adequately address the violation,
6 identify a corrective action, or provide the requested documents.

7 16. As a result, CCB Agents held a conference with Michelle Norgard on
8 September 1, 2023, to address these deficiencies. At that time, Ms. Norgard agreed to
9 submit an amended plan of correction to the CCB by September 8, 2023. Neither Ms.
10 Norgard nor anyone else from GHC met this deadline. The 2023 CCB Agents sent follow-
11 up emails to Ms. Norgard on September 15 and 19, 2023. Ms. Norgard did not respond
12 until September 20, 2023, when she stated "In follow up, any outstanding information
13 regarding the POC will be forwarded to you no later than this time tomorrow. The
14 information provided was incomplete and additional research was required."

15 17. The 2023 CCB Agents received a second plan of correction from Ms. Norgard
16 on September 21, 2023. The second plan of correction was unacceptable because it failed
17 to properly address the majority of the violations in the 2023 SOD (it did not identify
18 corrective actions, did not provide the requested documents, cited to outdated regulations
19 as justification for several violations, and asked for further detail on the documents
20 requested, when said detail had already been provided). As a result, the 2023 CCB Agents
21 sent an unapproved plan of correction letter ("UPOC") on October 11, 2023, requesting a
22 third plan of correction by October 25, 2023.

23 18. On November 2, 2023, the 2023 CCB Agents received GHC's third plan of
24 correction. After review, the 2023 CCB Agents deemed it acceptable, except for the fact
25 that certain supplemental documents and information still had not been provided³. On
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27 ³ Including the following: (1) Copies of blank employee hiring file and training documents; (2) Remote access
28 information for the security system; (3) Quarterly inventory reports for 2021 to 2023; (4) Updated Standard
Operating Procedures for limitations when combining lots; (5) A request for Board approval for changes in
operating hours; and (6) Production logs for January to August 2023 to document the facility had been
operational.

1 January 4, 2024, the 2023 CCB Agents sent GHC a letter approving the third plan of
2 correction with a request that the aforementioned missing documents be provided within 5
3 days. GHC provided some of the supplemental documents on January 18, 2024; however,
4 it still failed to provide any of the quarterly inventory or sales reports for 2021 through
5 2023.

6 19. On or about January 17, 2024, Keoki Allen, the CCB's Audit Supervisor, and
7 CCB Agent Anissa Acfalle, held a call with Michelle Norgard to discuss the lack of quarterly
8 inventory reports for 2021 through 2023. Ms. Allen discussed with Ms. Norgard that GHC
9 had repeatedly failed to conduct physical inventory counts and submit the required
10 quarterly inventory reports timely. Ms. Norgard acknowledged this violation and said
11 GHC would submit the missing reports as soon as possible. Ms. Allen responded that, by
12 this point in time, it would be impossible to conduct retroactive physical inventory counts,
13 as compliance with the physical inventory count had to occur at the designated reporting
14 intervals. The data needed to complete each quarters' physical inventory count was no
15 longer available due to the GHC's failure to complete the physical inventory counts in the
16 past. Thus, by January 2024, GHC's failures to comply with NCCR 6.080(8)(c) had
17 rendered it impossible to provide quarterly inventory reports for 2021 through 2023.

18 20. Commencing on February 9, 2024, and concluding on April 30 2024, the CCB
19 conducted its routine audit of 2024 for GHC (the "2024 Audit"). The CCB Agent for this
20 Audit was Christy Thurston ("Agent Thurston"). As a result of the 2024 Audit, Agent
21 Thurston sent GHC a Statement of Deficiencies Letter on May 2, 2024 (the "2024 SOD").
22 The 2024 SOD stated that Agent Thurston found that GHC had not submitted quarterly
23 inventory and sales reports for 2023, and requested a plan of correction to address that
24 issue within 10 business days (May 16, 2024). GHC had not submitted a plan of correction
25 to address their failures to conduct the quarterly inventory counts.

26 21. On May 20, 2024, Agent Thurston sent an email to Mr. Caravette and Ms.
27 Norgard reminding them that they had not timely submitted a plan of correction for the
28 2024 SOD. Having received no response thereafter, Agent Thurston sent another email on

1 May 31, 2024, and left a voicemail for Mr. Caravette. On June 3, 2024, Agent Thurston
2 finally received the required plan of correction from GHC (dated May 31, 2024).

3 22. GHC's June 3, 2024, plan of correction merely stated that, "Onsite staff has
4 been hired to assist in the completion and filing of required reporting. - A calendaring
5 procedure has been created for continued submittal compliance." As a result, Agent
6 Thurston sent an unapproved plan of correction letter to GHC on June 4, 2024, noting that
7 no quarterly reports had been submitted to the CCB for 2023 or 2024 and that GHC
8 continued to be in violation of that requirement. The letter also requested a new plan of
9 correction be submitted. Although Ms. Allen had advised in January 2024 that it would be
10 impossible to complete 2023 inventory reports due to GHC's failure to do required inventory
11 counts, that did not relieve GHC of its requirements to do inventory counts in 2024 and
12 submit 2024 quarterly inventory reports. By the time of Agent Thurston's June 4, 2024,
13 unapproved plan of correction letter, GHC had failed to submit its quarterly inventory
14 report for the first quarter of 2024, which was due on April 30, 2024.

15 23. Agent Thurston then followed-up multiple times for a response to her June 4,
16 2024, request for an updated plan of correction. On July 5, 2024, Agent Thurston sent a
17 follow-up email correspondence and left voicemails for GHC stating that the amended plan
18 of correction was overdue. Agent Thurston further noted that a failure to respond could
19 lead to disciplinary action against GHC. Having had no response, on August 12, 2024,
20 Agent Thurston emailed GHC another reminder and included another unapproved plan of
21 correction letter formally notifying GHC again of its failure to respond. Ms. Norgard
22 responded to the August 12, 2024, correspondence, stating that she had been out of the
23 office and would provide a response within 10 business days. Having heard nothing, Agent
24 Thurston sent another follow-up email to GHC on August 29, 2024. Again, having heard
25 nothing from GHC, Agent Thurston again sent GHC a follow-up email on September 12,
26 2024. That email again reminded GHC of a potential disciplinary action if it continued to
27 fail to respond to the CCB. Agent Thurston also left voicemails for Mr. Caravette and Ms.
28 Norgard on that date. Agent Thurston still received no response from GHC. Again, on

1 October 3, 2024, Agent Thurston left a voicemail message for Mr. Caravette and he again
2 failed to respond.

3 24. As of January 15, 2025, the CCB still has received no response from GHC
4 regarding its unapproved plan of correction for the 2024 audit. As of January 15, 2025,
5 GHC has still failed to submit any quarterly inventory reports or sales reports for 2024 to
6 the CCB.

7 25. On November 14, 2024, pursuant to NRS 233B.127(3), the undersigned
8 counsel for CCB sent Daniel Caravette, via certified mail, a letter notifying GHC of CCB's
9 intent to proceed with disciplinary action that could result in revocation or suspension of
10 GHC's cannabis establishment license (the "NRS 233B Letter"). GHC was invited to
11 respond to the NRS 233B Letter by December 2, 2024, and show compliance with all lawful
12 requirements for retention of its license. On December 2, 2024, GHC, through Daniel
13 Caravette, responded to the NRS 233B Letter, generally denying that GHC had committed
14 any violations and requesting a one-week extension to respond further, which the
15 undersigned granted. On December 10, 2024, Mr. Caravette sent a second response to the
16 NRS 233B Letter, which was again a general denial that GHC had committed any
17 violations. Mr. Caravette's December 10, 2024, letter also asserted that the 2024 quarterly
18 inventory and sales reports had been submitted; however, a review of Accela as of January
19 15, 2025, found that GHC had submitted no such reports. Accordingly, the CCB staff has
20 found Mr. Caravette's responses to the NRS 233B Letter to be incomplete and inadequate
21 and therefore proceeds with this disciplinary action.

22 Violations of Law

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

24 27. As to license P097, with respect to the 2023 Audit, Respondent GHC violated
25 NCCR 4.035(1)(a)(11), by obstructing regulatory personnel from performing their official
26 duties. Specifically, as set forth in Paragraphs 10 through 19, above, GHC established a
27 pattern and practice of consistently ignoring the CCB's requests for documents and
28 information. When GHC did respond to CCB requests, it significantly delayed its responses

1 and only provided partial or incomplete information and documents. The CCB initially
2 requested documents for its audit on May 18, 2023. Despite numerous follow up requests,
3 documents still had not been provided by January 4, 2024, almost 8 months later. Even
4 then, inventory and sales reports for 2021, 2022, and 2023, still were not submitted to the
5 CCB and still have not been submitted to the CCB. As set forth above, GCH's delay in
6 compliance with inventory counts rendered it impossible to prepare inventory reports for
7 2021 through 2023. In addition, GHC failed to provide a compliant plan of correction
8 (initially requested on August 11, 2023) for nearly 5 months, despite the CCB's multiple
9 attempts to follow-up on this request. The foregoing acts and omissions constitute one
10 Category I violation, which carries a civil penalty of not more than \$20,000 and a
11 suspension of not more than 30 days, or revocation of a license. NCCR 4.035(2)(a)(1). The
12 CCB seeks a civil penalty of \$20,000 and a suspension of 30 days for license P097 for this
13 violation.

14 28. As to license P097, with respect to the 2024 Audit, Respondent GHC violated
15 NCCR 4.035(1)(a)(11), by obstructing regulatory personnel from performing their official
16 duties. Specifically, as set forth in Paragraphs 19 through 23, above, during 2024, GHC
17 continued its established pattern and practice of consistently ignoring the CCB's requests
18 for documents and information. When GHC did respond to CCB requests, it significantly
19 delayed its responses and only provided partial or incomplete information and documents.
20 Moreover, GHC completely failed to respond to the CCB's request for a compliant plan of
21 correction. The CCB requested a complaint plan of correction and submittal of quarterly
22 inventory and sales reports on May 2, 2024. Despite numerous follow up requests, GHC
23 has never provided a compliant plan of correction and to date has failed to submit to CCB
24 any quarterly sales or inventory reports for 2021, 2022, 2023, and 2024. The foregoing acts
25 and omissions constitute a second and separate⁴ Category I violation, which carries the
26 penalty of revocation of a license. NCCR 4.035(2)(a)(2). The CCB seeks a revocation of
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28 ⁴ NRS 678A.520(1)(e) allows the CCB to charge a separate violation if the same or similar violation was discovered during a second audit. In this case the 2023 audit and 2024 audit uncovered separate and distinct obstructive actions on the part of GHC.

1 license P097 for this violation.

2 29. As to license P097, with respect to the 2023 Audit, Respondent GHC violated
3 NCCR 4.035(1)(a)(10), by failing to immediately admit regulatory or law enforcement
4 personnel into the premises of a cannabis establishment. Specifically, as detailed in
5 Paragraph 12, above, on June 13, 2023, the 2023 CCB Agents were unable to access GHC's
6 facility. It then took over two weeks of pushing GHC to allow access to the facility before
7 the 2023 CCB Agents could even access the facility for their field audit – this was the same
8 situation the CCB experienced during the 2022 audit, which was the subject of the 2023
9 Complaint. The foregoing acts and omissions constitute a third and separate Category I
10 violation, which carries the penalty of revocation of a license. NCCR 4.035(2)(a)(2). The
11 CCB seeks a revocation of license P097 for this violation.

12 30. As to license P097, with respect to the 2023 Audit, Respondent GHC violated
13 NCCR 4.055(1)(a)(14), NCCR 6.080(10)(b), 6.072(1), 6.085(1)(c)(3)(VI), 6.085(1)(c)(3)(III),
14 6.080(8)(c), and 6.135, by failing to properly respond to a Board Agent's request for
15 documentation, information, video, or other records. Specifically, as set forth in Paragraph
16 11(a), (b), (c), and (d), GHC failed to timely respond to the 2023 Board Agents' requests for
17 employee hiring files and training manuals, security surveillance system screen prints,
18 information required for remote access of its security system, and quarterly inventory and
19 sales reports⁵. The foregoing acts and omissions constitute a Category IV violation, which
20 is the second Category IV violation within 3 years. As set forth in Paragraph 8, above, on
21 October 24, 2023, GHC admitted to, and was adjudicated to have committed, the same
22 Category IV violation. This second Category IV violation carries a civil penalty of \$10,000
23 or a suspension of not more than 7 days. NCCR 4.055(2)(a)(2). The CCB seeks a civil
24 penalty of \$7,500 for this violation.

25 31. As to license P097, with respect to the 2023 Audit, Respondent GHC violated
26 NCCR 4.060(1)(a)(6) and NCCR 6.070(6), by failing to maintain a proper visitor log, as set
27 forth in Paragraph 11(e), above. The foregoing acts and omissions constitute a Category V

28 ⁵ As set forth in this Complaint, the failure to submit required sales and inventory reports has been a continuous and repeated violation from 2021 through today.

1 violation, which is the second Category V violation within 3 years. As set forth in
2 Paragraph 8, above, on October 24, 2023, GHC admitted to, and was adjudicated to have
3 committed, one Category V violation. This second Category V violation carries a civil
4 penalty of \$2,500. NCCR 4.060(2)(a)(2). The CCB seeks a civil penalty of \$2,500 for this
5 violation.

6 32. As to license P097, with respect to the 2023 Audit, Respondent GHC violated
7 NCCR 4.060(1)(a)(6) and NCCR 1.165 by failing to adhere to the limitations on lot sizes, as
8 set forth in Paragraph 11(f), above. The foregoing acts and omissions constitute a Category
9 V violation, which is the third Category V violation within 3 years. This third Category V
10 violation carries a civil penalty of \$5,000 and/or a suspension for not more than 3 days.
11 NCCR 4.060(2)(a)(3). The CCB seeks a civil penalty of \$5,000 for this violation.

12 33. As to license P097, with respect to the 2023 Audit and the 2024 audit,
13 Respondent GHC violated NCCR 4.060(1)(a)(7) by failing to submit quarterly inventory
14 reports and sales reports. As set forth above, GHC has never submitted any quarterly
15 inventory or sales reports to the CCB for 2021, 2022, 2023, and 2024. The foregoing acts
16 and omissions constitute a Category V violation, which is the fourth Category V violation
17 within 3 years. This fourth Category V violation carries a civil penalty of \$10,000 and/or a
18 suspension for not more than 7 days. NCCR 4.060(2)(a)(4). The CCB seeks a civil penalty
19 of \$10,000 for this violation.

20 **DISCIPLINE AUTHORIZED**

21 Pursuant to the provisions of NRS 678A.600, NCCR 4.020, 4.030, 4.035 through
22 4.060, and 5.100, the CCB has the discretion to impose the following disciplinary actions:

- 23 1. Revoke the cannabis cultivation license of GHC;
- 24 2. Suspend the cannabis cultivation license of GHC;
- 25 3. Impose a civil penalty of not more than \$20,000 for each separate violation of
26 NRS Title 56 and the NCCR on the cannabis cultivation licenses of GHC; and/or
- 27 4. Take such other disciplinary action as the CCB deems appropriate.

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

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RELIEF REQUESTED

Based on the foregoing, counsel for the CCB respectfully requests the CCB impose the penalty of revocation and civil penalties against GHC in the amount of \$45,000.

NOTICE TO RESPONDENT

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

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

- (a) Must state in short and plain terms the defenses to each claim asserted.
- (b) Must admit or deny the facts alleged in the complaint.
- (c) Must state which allegations the respondent is without knowledge or information form a belief as to their truth. Such allegations shall be deemed denied.
- (d) Must affirmatively set forth any matter which constitutes an avoidance or affirmative defense.
- (e) May demand a hearing. **Failure to demand a hearing constitutes a waiver of the right to a hearing and to judicial review of any decision or order of the Board**, but the Board may order a hearing even if the respondent so waives his or her right.

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

1 The Board shall determine the time and place of the hearing as soon as is reasonably
2 practical after receiving the Respondent's answer. The Board may assign a hearing officer
3 to conduct the hearing under NCCR 2.070 and 4.095. The Board or its assigned hearing
4 officer shall deliver or send by registered or certified mail a notice of hearing to all parties
5 at least 10 days before the hearing. The hearing must be held within 45 days after receiving
6 the respondent's answer unless an expedited hearing is determined to be appropriate by
7 the Board, in which event the hearing must be held as soon as practicable. NRS
8 678A.520(4). The Chair of the Board or the assigned hearing officer may grant one or more
9 extensions to the 45-day requirement pursuant to the request of a party or an agreement
10 by both parties. NRS 678A.520(4).

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

13 James Humm, Executive Director
14 Cannabis Compliance Board
15 700 East Warm Springs Road, Ste. 100
16 Las Vegas, Nevada 89119
17 jhumm@ccb.nv.gov

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

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

 You have the right to request that the CCB issue subpoenas to compel witnesses to

1 testify and/or evidence to be offered on your behalf. In making this request, you may be
2 required to demonstrate the relevance of the witness's testimony and/or evidence.

3 If the Respondent does not wish to dispute the charges and allegations set forth
4 herein, within 30 days of the service of this Complaint, Respondent may pay the requested
5 civil penalties set forth above in the total amount of \$45,000, and surrender license
6 P097, on notice to:

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8 James Humm, Executive Director
9 Cannabis Compliance Board
10 700 East Warm Springs Road, Ste. 100
11 Las Vegas, Nevada 89119

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

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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: January 16, 2025.

4 STATE OF NEVADA, CANNABIS COMPLIANCE BOARD

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

10
11 AARON D. FORD
12 Attorney General

13
14 By: 
15 L. Kristopher Rath (Bar No. 5749)
16 Senior Deputy Attorney General
17 555 E. Washington Ave, Suite 3900
18 Las Vegas, Nevada 89101
19 (702) 486-3420

20
21 Attorneys for the Cannabis Compliance Board
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23
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25
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27
28

**CANNABIS COMPLIANCE BOARD
STATE OF NEVADA**



JOE LOMBARDO
Governor

ccb.nv.gov
CARSON CITY OFFICE
3850 Arrowhead Drive, Suite 100
Carson City, Nevada 89706
Main Line: (775) 687-6299

LAS VEGAS OFFICE
700 East Warm Springs Road, Suite 100
Las Vegas, Nevada 89119

JAMES HUMM
Executive Director

MICHAEL MILES
Deputy Director

ADRIANA GUZMÁN FRALICK
Chair

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 Greenway Health Community, LLC 2025-001 from the Cannabis Compliance Board upon the addressee as follows:

Electronic Mail:

GHC.Nevada@gmail.com

dcaravette@aol.com

Certified Mail:

Daniel Caravette, G

39W101 Dean Lane, St.

Charles, IL 60175

Dated at Las Vegas, Nevada, this 16th day of January, 2025.

A handwritten signature in black ink that reads "Amber Powell".

Amber Powell, Executive Assistant