

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

STATE OF NEVADA CANNABIS  
COMPLIANCE BOARD,

Petitioner,

Case No. 2025-23

Vs.

LONE MOUNTAIN PARTNERS, LLC  
DBA ZENLEAF OF NORTH LAS VEGAS  
(RD592),

Respondent.

**COMPLAINT FOR DISCIPLINARY ACTION**

The Cannabis Compliance Board of the State of Nevada (CCB or Complainant), by and through its counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Allison L. Herr, Senior Deputy Attorney General, having a reasonable basis to believe that Lone Mountain Partners, LLC dba Zenleaf of North Las Vegas, entity number 592 (Zenleaf or Respondent) has violated provisions of Title 56 of the Nevada Revised Statutes (NRS) and the Nevada Cannabis Compliance Regulations (NCCR), issues its Complaint and alleges as follows:

**JURISDICTION**

1. Petitioner, CCB, is a regulatory agency of the State of Nevada, duly organized and existing under NRS Chapter 678A, and is charged with the administration and enforcement of the cannabis laws of this state as set forth in Title 56 of the NRS and the Regulations of the CCB.

2. Zenleaf is registered in Nevada as a Domestic Limited Liability Company and licensed by the CCB to sell cannabis in Nevada. The Nevada Secretary of State identifies Zenleaf's manager as Verano Nevada, LLC. James Leventis has been designated as the CCB's point of contact for Zenleaf. During all relevant times mentioned in this Complaint, Zenleaf held, and currently has, the following license at issue in this Complaint:

ID	License	Last Issued/Renewed	Address
RD592		12/01/2024	

3. As Zenleaf holds its license with the CCB, it is subject to NRS Title 56 and the NCCRs for the violation asserted herein. Therefore, Zenleaf is subject to the jurisdiction of the CCB and subject to discipline under NRS 678A through 678D, NRS Chapter 233B, and the relevant provisions of the NCCRs.

4. As required under NRS 678A.500 and 678A.510(1)<sup>1</sup>, the CCB's Executive Director has transmitted the details of the suspected violations committed by Zenleaf to the Attorney General, and the Attorney General has investigated the alleged violations to determine whether they warrant proceedings for disciplinary action. The Attorney General has recommended to the Executive Director that further proceedings are warranted, as outlined in this CCB Complaint. The Executive Director has transmitted this recommendation and information to the CCB. Under NRS 678A.510(2)(c), the CCB has voted to proceed with appropriate disciplinary action under NRS 678A.520 through 678A.600<sup>2</sup>. Under NRS 678A.520(1), the CCB's Executive Director has authorized service of this Complaint upon Zenleaf.

## FACTUAL ALLEGATIONS

5. Supervisory Investigator Heather Phillips initiated a routine compliance check of the Zenleaf dispensary.

6. On or about March 12, 2025, Shae Dunn, an individual under the age of 21, entered Zenleaf's licensed premises located at 4444 W. Craig Rd., Ste. 100-104, North Las Vegas, NV 89032.

7. The CCB employs Shae Dunn; however, during the investigation, she did not identify herself as such, she wore no uniform, she did not display any credentials, and provided no indication of her employment; instead, she deliberately presented herself solely as a member of the public attempting to purchase cannabis, thereby acting exclusively in the capacity of a customer.

8. Upon entry to the facility, Shae Dunn presented her lawful identification in the form of a United States passport to personnel at the front desk. She was allowed entry to a back area where a budtender helped her select a product.

9. While on the premises, Shae Dunn purchased two cannabis pre-roll products, which are

<sup>1</sup> As amended by Nev. Assemb. B. 76, § 13-14, 83d Leg., Reg. Sess (2025).

<sup>2</sup> As amended by Nev. Assemb. B 76 §5-6 and §15-23, 83d Leg., Reg. Sess. (2025).

legally restricted for sale only to individuals 21 years of age or older or those persons with an authorized medical registry identification card. Dunn was not asked for identification at the register.

10. At the time of purchase, Shae Dunn was 20 years of age. She does not possess a medical registry identification card and did not at the time of sale.

11. Zenleaf and its agents, employees, or representatives failed to properly verify Shae Dunn's age before permitting entry into the sales facility and completing the sale of cannabis in violation of NRS 678B.545, and NCCRs 6.070, 7.015, and 7.020.

12. After completing the purchase, Shae Dunn exited the facility and reported her activities to Supervisory Investigator Heather Phillips, who documented the event and took the cannabis and sale receipt into evidence.

13. Thereafter, CCB Auditor Marvin Taylor emailed a request to Zenleaf to provide video footage of the time period on March 12, 2025, covering the entry and sale.

14. CCB Auditor Reid Sakai subsequently observed the video and confirmed Shae Dunn's entry into the facility and purchase of cannabis pre-rolls by reviewing security footage from the store.

15. In the five months following the events of March 12, 2025, Zenleaf has not reported to the CCB the events constituting the entry and sale of cannabis to an underage person.

16. At all times relevant, Zenleaf was responsible for ensuring compliance with all applicable laws, regulations, and conditions of licensure, including but not limited to prohibiting access and sales to persons under 21 years of age, and reporting any serious incident or criminal activity to the CCB.

#### **RELEVANT LAW**

17. NRS 678B.520 restricts entry to a cannabis sales facility to those persons who are 21 years of age or older.

18. NRS 678B.545 requires all cannabis establishment agents to ensure their customers are twenty-one years of age or older.

Before a cannabis establishment agent sells cannabis or a cannabis product to a consumer, the cannabis establishment agent shall verify the age of the consumer by checking a government-issued identification that contains a photograph of the consumer using an identification scanner which has been approved by an appropriate agent of the Board to determine the validity of any government-issued identification.

1           19.     Under NRS 678D.300(1) a person, including a cannabis licensee, is not exempt from state  
2 prosecution for the knowing delivery of cannabis to a person who is not 21 years of age or older unless  
3 the recipient holds a valid medical registry card and the licensee "demanded and was shown bona fide  
4 documentary evidence of the age and identify of the recipient."

5           20.     NCCR 6.070(1) limits the persons who may be on the premises of a cannabis sale facility.  
6 Members of the public are limited to persons 21 years of age or older, or those with a valid registry  
7 identification card.

8           21.     NCCR 6.072(f) requires that all cannabis establishment agents be trained before beginning  
9 work on "methods of refusing entry or sales to prohibited persons, including, without limitation: verifying  
10 identification and using age verification devices."

11           22.     Pursuant to NCCR 7.015, before selling cannabis or cannabis products to a consumer, a  
12 cannabis establishment agent must verify the consumer's age by checking a government-issued  
13 identification card containing a photograph using an identification scanner approved by the appropriate  
14 Board Agent.

15           23.     NCCR 7.020 further requires that a cannabis sales facility must refuse to sell cannabis or  
16 cannabis products to any person unless the person produces valid proof of being 21 years of age or older.  
17 Identification must meet strict standards, including containing a photograph and date of birth, and must  
18 be valid and unexpired.

19           24.     By allowing a person under the age of 21 to enter the licensed premises and purchase  
20 cannabis or a cannabis product without properly verifying the individual's age, Zenleaf violated NRS  
21 678B.545, NCCR 6.070(1), NCCR 7.015, and NCCR 7.020.

22           25.     NCCR 4.050(1)(a)(8) requires a licensee to self-report within 24 hours of the discovery  
23 of "a serious incident or criminal activity on the premises." As the act of selling cannabis to a person  
24 under 21 years of age may constitute both a criminal and a regulatory violation, it constitutes both a  
25 serious incident and potentially criminal activity.

26           26.     NCCR 4.060(1)(a)(7) also makes it a regulatory violation to fail to submit reports required  
27 by the Board.  
28

27. By failing to report the incident, Zenleaf violated NCCR 4.050(1)(a)(8) and NCCR 4.060(1)(a)(7).

28. NRS Chapter 678A authorizes the CCB to take disciplinary action for violations of its statutes or regulations.

29. NRS 678A.600 authorizes the following penalties for statutory or regulatory violations:

1. If the Board finds that a licensee or registrant has violated a provision of this title or any regulation adopted pursuant thereto, the Board may:

(a) Limit, condition, suspend or revoke the license or registration card of the licensee or registrant;

(b) Impose a civil penalty in an amount established by regulation, not to exceed \$20,000 for a single violation;

(c) Take any combination of the actions authorized by paragraphs (a) and (b);

(d) Issue a warning to the licensee or registrant; or

(e) Take no action against the licensee or registrant.

2. In determining the appropriate action to be taken against a licensee or registrant pursuant to this section, including, without limitation, the amount of any civil penalty imposed, the Board shall consider whether any of the mitigating circumstances set forth in NRS 678A.647 exist.

## **VIOLATIONS**

### **COUNT 1**

30. Under NCCR 4.040(1)(a)(4), "allowing a person who is less than 21 years of age to enter or remain in a cannabis establishment" is a Category II violation.

31. In the alternative, NCCR 4.040(1)(a)(3) provides that "failing to verify the age of, or selling ... cannabis or cannabis paraphernalia, to a person who is less than 21 years of age" is a Category II violation.

32. This violation<sup>3</sup> carries a civil penalty of not more than \$20,000<sup>4</sup> and a suspension for not more than 20 days of a license or cannabis establishment agent registration card. NCCR 4.040(2)(a)(1).

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<sup>3</sup> The acts of allowing an underage party to enter the premises and purchase cannabis are charged as one count. NRS 678A.520(1)(e) provides that multiple violations, closely related in time or circumstance, consisting of the same or similar act, or course of conduct, discovered in the course of a single investigation, are to be charged as a single count.

<sup>4</sup> According to the version of NCCR 4.040 in effect at the time of the violation, a Category II violation (first offense) incurs a civil penalty of up to \$25,000 and possible suspension of the license or agent card. However, the 2023 amendment of NRS 678A.600 lowers the penalty to a maximum \$20,000 fine for a single violation.

1 COUNT 2

2 33. NCCR 4.050(1)(a)(7) states that "allowing any activity which violates the law of this  
3 State" on the premises of a cannabis establishment is a Category III violation.

4 34. In the alternative, NCCR 4.050(1)(a)(8) states that "failing to notify the Board or Board  
5 Agents within 24 hours after discovery of a serious incident or criminal activity" on the premises of a  
6 cannabis sales facility is a Category III violation.

7 35. In the alternative, if Zenleaf was not aware of the violation, NCCR 4.055 makes it a  
8 category IV violation to create a climate that is conducive to abuses associated with the sale of cannabis.  
9 Failing to discover an underage sale, even after receiving a request for video footage of the incident from  
10 CCB employees, may be considered evidence of a climate that is conducive to abuse, since ID scanners  
11 maintain a history of scanned data.

12 36. This violation<sup>5</sup>, if found to be a Category III violation, carries a maximum penalty of  
13 \$10,000 for a first offense in the preceding three-year period. If found to be a Category IV violation, it  
14 carries a maximum penalty of \$5,000 for a first violation in the preceding three-year period.

15 **RECOMMENDED PENALTY**

16 Based on the foregoing, counsel for the CCB respectfully recommends that the CCB  
17 impose a civil penalty not to exceed \$20,000.00 against Zenleaf for a single Category II  
18 violation and does not recommend the suspension of the Zenleaf's license.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, based on the allegations and recommendations contained herein, which constitute  
21 reasonable cause for disciplinary action against Respondent, Complainant prays for relief as follows:

22 1. The CCB fines the Respondent a monetary sum within the parameters of NRS  
23 678A.600(1)(b) for each violation of the provision of Title 56 of the NRS or the NCCR.

24 2. That the CCB act against the Respondent's license XXX, under the parameters of NRS  
25 678A.600(1)(a); and,  
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27 <sup>5</sup> The actions outlined in paragraphs 31, 32, and 33 are charged as one count. NRS 678A.520(1)(e) provides that  
28 multiple violations, closely related in time or circumstance, consisting of the same or similar act, or course of  
conduct, discovered in a single investigation, are to be charged as a single violation.

3. For such other and further relief as the CCB may deem just and equitable, as provided under NRS 678A.600(1)(c), (d), or (3).

### 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.610<sup>6</sup>. **Failure to demand a hearing constitutes a waiver of the right to a hearing, the right to request a review of the hearing officer's decision or order by the Board, and the right to judicial review of any Board decision.** NRS 678A.520(2)(e)<sup>7</sup>.

**PLEASE TAKE NOTICE**, you, as the Respondent, **must answer this Complaint within twenty (20) days after service of this Complaint, unless granted an extension.** Pursuant to NRS 678A.520(2)<sup>8</sup>, 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 to 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, the right to request a review of the hearing officer's decision or order by the Board, and the right to judicial review of any Board decision.**

**Failure to answer or to appear at the hearing, if Respondent has demanded a hearing, constitutes an admission by the respondent of all facts alleged in the Complaint. The hearing officer may take action based on such an admission and on other evidence without further notice to the respondent.** NRS 678A.520(7)<sup>9</sup>.

Upon receipt of an answer demanding a hearing or the expiration of the time to answer the complaint, the Board shall assign the matter to a hearing officer. NRS 678A.520(6). The hearing officer

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<sup>6</sup> As amended by Nev. Assemb. B. 76 §5-6 and § 14-23, 83d Leg., Reg. Sess. (2025).

<sup>7</sup> As amended by Nev. Assemb. B 76 §15, 83d Leg., Reg. Sess. (2025).

<sup>8</sup> As amended by Nev. Assemb. B 76 §15, 83d Leg., Reg. Sess. (2025).

<sup>9</sup> As amended by Nev. Assemb B 76 §15, 83d Leg., Reg. Sess. (2025).

1 shall determine the time and place of the hearing as soon as is reasonably practical after receiving the  
2 Respondent's Answer. The hearing officer shall deliver or send by registered or certified mail, or by  
3 electronic means, a notice of hearing to all parties at least 10 days before the hearing. The hearing must  
4 be held within 120 days after receiving the respondent's answer, unless an expedited hearing is deemed  
5 appropriate by the Executive Director or the Board; in that case, the hearing must be held as soon as  
6 practicable. NRS 678A.520(8)<sup>10</sup>. The hearing officer may grant one or more extensions to the 120-day  
7 requirement upon the request of a party or upon agreement between the parties. Id.

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

10 James Humm, Executive Director  
11 Cannabis Compliance Board  
12 700 E. Warm Springs Rd, Suite 100  
Las Vegas, NV 89119  
jhummm@ccb.nv.gov

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

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

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

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28 <sup>10</sup> As Amended by Nev. Assemb. B. 76, §15, 83d Leg., Reg. Sess. (2025).



1 If pursuant to NCCR 4.075(5), the Respondent does not wish to dispute the charges and  
2 allegations set forth herein, within thirty (30) days of the service of this Complaint, the Respondent shall  
3 provide notice to the CCB that it will pay the requested civil penalty set forth above in the total amount  
4 of \$20,000. Notice should be sent to:

5 James Humm, Executive Director  
6 Cannabis Compliance Board  
7 700 E. Warm Springs Rd, Suite 100  
8 Las Vegas, NV 89119

8 Respondent is further notified and informed that under NRS 678A.645 and NRS 233B.121(5),  
9 Respondent, individually or through counsel, may, at any time, enter into settlement negotiations to  
10 potentially resolve this matter via a settlement agreement, subject to Board approval. Should Respondent  
11 desire to attempt to resolve this matter via a settlement agreement, Respondent (or its counsel, if  
12 Respondent is represented) should contact the Senior Deputy Attorney General listed below via email at  
13 aherr@ag.nv.gov.

14 YOU ARE HEREBY ORDERED to immediately cease the continuation or repeated occurrence  
15 of the violations described above, which are a violation of Nevada law.

16 DATED this 18th day of September, 2025.

17 STATE OF NEVADA,  
18 CANNABIS COMPLIANCE BOARD

19  
20 By: 

James Humm, Executive Director  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Rd, Suite 100  
Las Vegas, NV 89119

22 AARON D. FORD  
23 Attorney General

24  
25 By: 

Allison L. Herr (Bar No. 5383)  
Senior Deputy Attorney General  
1 State of Nevada Way, Suite 100  
Las Vegas, NV 89119  
(702) 486-3355  
Attorneys for the Cannabis Compliance Board