

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

3 STATE OF NEVADA, CANNABIS
4 COMPLIANCE BOARD,

5 Petitioner,

6 vs.

7 BLOSSUM GROUP, LLC (C059),

8 Respondent.
9

Case No. 2025-006

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 Blossum Group, LLC, Cannabis Establishment Identification No. C059
15 ("Blossum" or "Respondent") has violated provisions of Chapters 678A through 678D of the
16 Nevada Revised Statutes ("NRS"), and the Nevada Cannabis Compliance Regulations
17 ("NCCR"), hereby issues its Complaint, stating the CCB's charges and allegations as
18 follows:

19 **Jurisdiction**

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

ID	License	Expiration Date	Address
C059	Medical & Adult-use Cultivation	June 30, 2025	No Current Address ¹
	52188599373858371816		

26
27 ¹ Blossum's license is currently in conditional status. At the time of the alleged violations set forth herein,
28 Blossum was operating in the Unincorporated Clark County Jurisdiction. Since that time, Blossum lost its
location and was reverted to conditional status on March 20, 2025. As of the date of this Complaint, Blossum's
license remains in conditional status.

2. During all relevant times mentioned in this Complaint, Blossum is and was registered as a Domestic Limited Liability Company in the State of Nevada. The Nevada Secretary of State lists the manager of Blossum as Hamid Rowshan, who is also the point of contact with the CCB.

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

4. Pursuant to NRS 678A.500 and 678A.510(1)², the CCB's Executive Director has transmitted the details of the suspected violations of Blossum to the Attorney General and the Attorney General has conducted a further investigation of the suspected 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 set forth in this CCB Complaint. The Executive Director has transmitted this recommendation and information to the CCB. Pursuant to NRS 678A.510(2)(c), the CCB has voted to proceed with appropriate disciplinary action under NRS 678A.520 through 678A.600³. Pursuant to NRS 678A.520(1), the CCB's Executive Director has authorized service of this Complaint upon Respondent.

Factual Allegations

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

A. Blossum's Compliance History.

6. On or about August 25, 2020, the CCB filed and served a complaint for disciplinary action against Blossum, CCB Case No. 2020-012 (the "2020 Complaint"). The 2020 Complaint arose from a CCB inspection and investigation which took place during July 2020. The 2020 Complaint was resolved via a settlement agreement, in which Blossum admitted to: (1) one Category III violation for failing to comply with seed-to-sale

² As amended by Nev. Assemb. B. 76, §§ 13-14, 83d Leg., Reg. Sess. (2025).

³ As amended by Nev. Assemb. B. 76, §§5-6 and §§ 15-23, 83d Leg., Reg. Sess. (2025).

1 tracking requirements; (2) one Category IV violation for improperly storing cannabis; and
2 (3) four Category V violations for failing to have a certified pest applicator and multiple
3 failures to properly maintain a building used for cannabis manufacture.

4 7. On January 5, 2022, the CCB conducted a routine audit of Blossum (the
5 “January 2022 Audit”). The January 2022 Audit resulted in the CCB sending Blossum a
6 Statement of Deficiencies Letter on January 21, 2022. On January 31, 2023, the CCB
7 issued a letter of concern to Blossum for its January 2022 Audit (the “January 2022 LOC”).
8 The January 2022 LOC warned Blossum that its January 2022 Audit had found the
9 following violations: (1) failure to tag cannabis plants; (2) failure to tag cannabis products;
10 and (3) failure to comply with seed-to-sale tracking requirements, as cannabis product in
11 its physical inventory was not recorded in the seed-to-sale tracking system (METRC).

12 8. On November 30, 2022, the CCB conducted a routine inspection of Blossum
13 (the “2022 Inspection”). The 2022 Inspection resulted in the CCB sending Blossum a
14 Statement of Deficiencies letter on December 13, 2022. That December 13, 2022 Statement
15 of Deficiencies Letter advised Blossum that the CCB had found multiple violations,
16 including: (1) failures to maintain a building used to manufacture cannabis; and (2)
17 multiple failures to tag cannabis plants (200 untagged plants in one room and untagged
18 clones in another, as well as untracked flower buds stored under a humidifier). Blossum
19 later submitted a plan of correction for these issues on March 29, 2023, which the CCB
20 approved on March 30, 2023.

21 9. On December 8-9, 2022, the CCB conducted another audit of Blossum (the
22 “December 2022 Audit”). The December 2022 Audit resulted in the CCB sending Blossum
23 a Statement of Deficiencies letter on March 28, 2023. That March 28, 2023 Statement of
24 Deficiencies Letter advised Blossum that the CCB had again found multiple violations,
25 including: (1) failures to follow seed-to-sale tracking requirements (harvest logs did not
26 record the exact weight of the harvest and did not match METRC entries, and physical
27 inventory did not match METRC data); (2) a failure to follow requirements for the disposal
28 of cannabis waste (the waste log weight of flower destroyed did not match METRC data);

1 and (3) failures to tag cannabis (CCB Agents found cannabis seeds that were ordered online
2 in the manager's office, which were not tagged or entered in METRC, and found three
3 packages of keif that had no METRC tags and could not be found in production logs).
4 Blossum later submitted a plan of correction for these issues on April 10, 2023, which the
5 CCB approved on May 24, 2024.

6 10. From September 29 through December 29, 2023, the CCB conducted a routine
7 audit of Blossum (the "December 2023 Audit"), which resulted in the CCB sending Blossum
8 a Statement of Deficiencies Letter on February 2, 2024. On September 23, 2024, the CCB
9 issued a second letter of concern to Blossum for its December 2023 Audit (the "2023 LOC").
10 The 2023 LOC warned Blossum that its December 2023 Audit had found the following
11 violations: (1) failure to properly respond to a Board Agent's request for documentation and
12 records; (2) failure to properly dispose of cannabis waste; (3) failure to properly/timely
13 submit required quarterly reports; (4) failure to comply with seed-to-sale tracking
14 requirements, including inventory discrepancies and variances in package weights in
15 METRC; and (4) failure to follow an approved security plan.

16 11. The CCB issued the 2022 LOC and the 2023 LOC as warnings to Blossum.
17 The CCB did not file disciplinary actions against Blossum for the January 2022 Audit, the
18 2022 Inspection, the December 2022 Audit, or the December 2023 Audit.

19 B. Blossum's 2024 Audit.

20 12. Commencing on September 23, 2024, and concluding on November 4, 2024,
21 the CCB conducted its routine audit of 2024 for Blossum (the "2024 Audit"). The CCB
22 Agent who conducted the 2024 Audit was Chantae Palacio. Agent Palacio commenced the
23 2024 Audit by requesting documents from Blossum. On review of the documents Blossum
24 provided, Agent Palacio found the following violations:

- 25 a. Blossum failed to meet the requirements for disposal of
26 cannabis waste. Specifically, the Cannabis Destruction/Waste
27 Log Blossum provided showed multiple items disposed on
28 September 27, 2024, as "harvest waste", though there were no

1 corresponding waste entries in METRC; and, Blossum failed to
2 maintain separate waste logs for its cultivation and production
3 facilities. ***This was a repeat violation from the December***
4 ***2023 Audit.***

5 b. Blossum failed to properly submit required quarterly inventory
6 and sales reports. Specifically, the quarterly sales and
7 inventory reports for Q1 of 2024 (due by April 30, 2024) and Q2
8 of 2024 (due by July 30, 2024) were not submitted to the CCB
9 until October 10, 2024. ***This was a repeat violation from the***
10 ***December 22 Audit and the December 2023 Audit.***

11 c. Blossum failed to notify the CCB of a change in its operating
12 hours, as required under NCCR 6.060(2). Specifically, CCB
13 discovered Blossum had changed its operating hours during
14 CCB's field visit on October 21, 2024, and Blossum did not give
15 the CCB notice of the change until October 23, 2024.

16 13. On October 21, 2024, Agent Palacio conducted a field audit of Blossum and
17 found the following additional violations:

18 a. Blossum failed to tag cannabis as required. Specifically, Agent Palacios
19 found untagged cannabis flower and dry cannabis sift in Blossum's
20 cultivation vault. ***This was a fourth repeat violation of untagged***
21 ***cannabis/cannabis product from the January 2022 Audit, the***
22 ***2022 Inspection, and the December 2022 Audit.***

23 b. Blossum failed to follow seed-to-sale tracking requirements.
24 Specifically, Agent Palacios found multiple packages in Blossum's
25 facility that, when weighed, did not match the weights recorded in
26 METRC. Blossum claimed these multiple variances were due to their
27 use of incorrect bags for packaging at the time they weighed the
28 packages. However, when given the opportunity to re-weigh the

1 packages with the "correct" bags, the variances were much greater.

2 ***This was a repeat violation from the December 2023 Audit.***

- 3 c. Blossum failed to comply with NCCR 6.050, as it did not post its current
4 cannabis license at its facility.

5 **Violations of Law**

6
7 14. CCB incorporates all prior Paragraphs as though fully set forth herein.

8 15. As to license C059, with respect to the 2024 Audit, Respondent Blossum
9 violated NCCR 6.080(7)(d)(9)(II) and NCCR 4.050(1)(a)(14), by failing to meet the
10 requirements for disposal of cannabis waste, as fully detailed in Paragraph 12(a), above.
11 The foregoing acts and omissions constitute one Category III violation, which carries a civil
12 penalty of not more than \$10,000. NCCR 4.050(2)(a)(1). The CCB seeks a civil penalty for
13 this violation of \$7,500.

14 16. As to license C059, with respect to the 2024 Audit, Respondent Blossum
15 violated NCCR 6.082(4) and NCCR 4.050(1)(a)(23), by failing to tag cannabis and cannabis
16 product as required, as fully detailed in Paragraph 13(a), above. The foregoing acts and
17 omissions constitute a second and separate Category III violation, which carries a civil
18 penalty of not more than \$20,000, and/or a suspension for not more than 10 days. NCCR
19 4.050(2)(a)(2). The CCB seeks a civil penalty of \$15,000 for this violation.

20 17. As to license C059, with respect to the 2024 Audit, Respondent Blossum
21 violated NCCR 6.080(8)(a) and NCCR 4.050(1)(a)(3), by failing to comply with seed-to-sale
22 tracking requirements, as fully detailed in Paragraph 13(b), above. The foregoing acts and
23 omissions constitute a third and separate Category III violation, which carries a civil
24 penalty of not more than \$20,000, and/or a suspension for not more than 20 days. NCCR
25 4.050(2)(a)(3). The CCB seeks a civil penalty of \$20,000 for this violation.

26 18. As to license C059, with respect to the 2024 Audit, Respondent Blossum
27 violated NCCR 6.060(2) and NCCR 4.060(1)(a)(6), by failing to notify the CCB of the change
28 in its operating hours, as fully detailed in Paragraph 12(c), above. The foregoing acts and
omissions constitute one Category V violation, which requires a warning. NCCR

1 4.060(2)(a)(1). The CCB seeks a formal warning for this violation.

2 19. As to license C059, with respect to the 2024 Audit, Respondent Blossum
3 violated NCCR 6.050 and NCCR 4.060(1)(a)(6), by failing to post its current cannabis
4 license at its facility, as fully detailed in Paragraph 13(c), above. This act and omission
5 constitutes a second and separate Category V violation, which carries a civil penalty of
6 \$2,500. NCCR 4.060(2)(a)(2). The CCB seeks a civil penalty of \$1,500 this violation.

7 20. As to license C059, with respect to the 2024 Audit, Respondent Blossum
8 violated NCCR 6.135 and NCCR 4.060(1)(a)(7), by failing to properly submit required
9 quarterly reports to the Board, as fully detailed in Paragraph 12(b), above. The foregoing
10 acts and omissions constitute a third and separate Category V violation, carries a civil
11 penalty of \$5,000. NCCR 4.060(2)(a)(2). The CCB seeks a civil penalty of \$4,000 for this
12 violation.

13 **DISCIPLINE AUTHORIZED**

14 The provisions of NRS 678A.600 and 678A.610⁴, NCCR 4.020, 4.030, 4.035 through
15 4.060, and 5.100, authorize the CCB has to impose the following disciplinary actions:

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

21 The CCB is authorized to order one or any combination of the discipline described
22 above.

23 **RELIEF REQUESTED**

24 Based on the foregoing, counsel for the CCB respectfully requests the CCB impose
25 civil penalties against Blossum in the amount of \$48,000, as well as a formal warning,
26 pursuant to NCCR 4.060(2)(a)(1). Counsel for the CCB ***does not*** request the Board issue
27 a suspension or revocation of license C059 for the violations alleged in this Complaint.
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⁴ As amended by Nev. Assemb. B. 76, §§5-6 and §§ 22-23, 83d Leg., Reg. Sess. (2025).

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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.610⁵. **Failure to demand a hearing constitutes a waiver of the right to a hearing, the right to request a review of the decision or order of the hearing officer by the Board and the right to judicial review of any decision of the Board.** NRS 678A.520(5)(e)⁶.

PLEASE TAKE NOTICE, you, as the Respondent, **must answer this Complaint within 21 days after service of this Complaint**, unless granted an extension under NRS 678A.520(4)⁷. Pursuant to NRS 678A.520(5)⁸, 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, the right to request a review of the decision or order of the hearing officer by the Board and the right to judicial review of any decision of the Board.**

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)⁹.

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

28 ⁶ As amended by Nev. Assemb. B. 76, §15, 83d Leg., Reg. Sess. (2025).

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

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

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

1 Upon receipt of an answer demanding a hearing or the expiration of the time to
2 answer the complaint, the Board shall assign the matter to a hearing officer. NRS
3 678A.520(6)¹⁰. The hearing officer shall determine the time and place of the hearing as
4 soon as is reasonably practical after receiving the Respondent's answer. The hearing officer
5 shall deliver or send by registered or certified mail, or by electronic means, a notice of
6 hearing to all parties at least 10 days before the hearing. The hearing must be held within
7 120 days after receiving the respondent's answer unless an expedited hearing is
8 determined to be appropriate by the Executive Director or the Board, in which event the
9 hearing must be held as soon as practicable. NRS 678A.520(8)¹¹. The hearing officer may
10 grant one or more extensions to the 120-day requirement pursuant to the request of a party
11 or an agreement by both parties. *Id.*

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

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

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

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

¹⁰ As amended by Nev. Assemb. B. 76, §15, 83d Leg., Reg. Sess. (2025).

¹¹ As amended by Nev. Assemb. B. 76, §15, 83d Leg., Reg. Sess. (2025).

1 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any
2 matter relevant to the issues involved.

3 You have the right to request that the CCB issue subpoenas to compel witnesses to
4 testify and/or evidence to be offered on your behalf. In making this request, you may be
5 required to demonstrate the relevance of the witness's testimony and/or evidence.
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7 If, pursuant to NCCR 4.070(5), the Respondent does not wish to dispute the charges
8 and allegations set forth herein, within 30 days of the service of this Complaint, Respondent
9 shall provide notice to the CCB that it will pay the requested civil penalties set forth
10 above in the total amount of \$48,000. Said notice shall be sent to:

11 James Humm, Executive Director
12 Cannabis Compliance Board
13 700 East Warm Springs Road, Ste. 100
14 Las Vegas, Nevada 89119

15 Upon such notice, Respondent shall be provided specific payment instructions and
16 the deadline for such payment.

17 Respondent is further notified and informed that, pursuant to NRS 678A.645,
18 Respondent, individually or through counsel, may, at any time, enter into settlement
19 negotiations to potentially resolve this matter via a settlement agreement, subject to Board
20 approval. Should Respondent desire to attempt to resolve this matter via a settlement
21 agreement, Respondent (or its counsel, if Respondent is represented) should contact the
22 Senior Deputy Attorney General listed below via email at lrath@ag.nv.gov.
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1
2 YOU ARE HEREBY ORDERED to immediately cease the activity described above
3 which is a violation of Nevada law.

4 DATED this 21st day of August, 2025.

5 STATE OF NEVADA, CANNABIS COMPLIANCE BOARD
6

7
8 By: 
9 James Humm, Executive Director
10 Cannabis Compliance Board
11 700 East Warm Springs Road, Ste. 100
12 Las Vegas, Nevada 89119

13 AARON D. FORD
14 Attorney General

15 By: 
16 L. Kristopher Rath (Bar No. 5749)
17 Senior Deputy Attorney General
18 555 E. Washington Ave, Suite 3900
19 Las Vegas, Nevada 89101
20 (702) 486-3420

21 Attorneys for the Cannabis Compliance Board
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