

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

3 STATE OF NEVADA CANNABIS
4 COMPLIANCE BOARD,

5 Petitioner,

Case No. 2026-006

6 Vs.

7 VEGAS VALLEY GROWERS LLC
8 (C006),

9 Respondent.

10 **AMENDED COMPLAINT FOR DISCIPLINARY ACTION**

11 Petitioner, the Cannabis Compliance Board of the State of Nevada (CCB or Board), by and
12 through its counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Allison L. Herr, Senior
13 Deputy Attorney General, having a reasonable basis to believe that Vegas Valley Growers LLC, entity
14 number C006 (VVG or Respondent) has violated provisions of Title 56 of the Nevada Revised Statutes
15 (NRS) and the Nevada Cannabis Compliance Regulations (NCCR), issues this Complaint and alleges as
16 follows:

17 **JURISDICTION**

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

21 2. VVG is registered in Nevada as a Domestic Limited Liability Company and licensed by
22 the CCB to operate a cannabis cultivation establishment in Nevada. The CCB's point of contact for VVG
23 is Laura Sciacca-DiBattista. During all relevant times mentioned in this Complaint, VVG held, and
24 currently has, the following license at issue in this Complaint:

25 ID	License	26 Last	Address
		27 Issued/Renewed	
C006	████████████████████	06/27/2025	████████████████████ ████████████████████

1 Cited at every routine inspection in the review period: May 2022, February 2023, December 2024,
2 May 2025, and November 2025. The violation appeared in progressively more rooms with each
3 successive inspection, indicating a complete absence of effective corrective action.

4 **C. Unsealed Doors, Wall and Ceiling Gaps, Fire Sprinkler Gaps**

5 Unsealed doors creating pest entry were cited in May 2022, February 2023, and January 2024.
6 Fire sprinkler ceiling gaps and wall and ceiling holes creating pest access were cited again in May
7 2025 and November 2025, demonstrating that pest exclusion measures remained inadequate
8 across the entire review period.

9 **D. Security Camera Obstruction and Inoperability**

10 A camera obstructed by a tarp was cited in May 2022 (NCCR 6.085(2)(b)). A camera in Dry
11 Room 2 was found improperly installed and obstructed in the February 2025 audit (NCCR
12 6.085(2)(b); NRS 678B.510(6)). By November 2025, multiple cameras, covering the back exit
13 door, the dry room, and the RadSource remediation room, were entirely offline and incapable of
14 producing requested footage.

15 **E. Employee Agent Card Violations**

16 Employees found working without valid agent cards: August 2022 (Alexander Morataya — card
17 expired nearly two years prior) and June 2024 (Joshua Brian Eberhart — application incomplete).

18 **F. Improperly Tagged Plants**

19 Approximately 2,000 plants improperly tagged (February 2023); five untagged plants corrected
20 on site (June 2024); eight plants with tags in soil rather than affixed to plants, corrected on site
21 (February 2025); untagged cannabis in RadSource machine (May 2025).

22 **G. Sanitizer Testing and Availability Failures**

23 Sanitizer test strips unavailable: January 2024 (SOD issued); December 2024 (SOD issued, the
24 facility voluntarily self-closed due to combined imminent health hazard); May 2025 (SOD issued,
25 CCB agent provided test strips directly to facility).

26 **H. Metrc / Inventory Recordkeeping Failures**

27 Late Metrc entries, quantity variances (including a 539-unit pre-roll discrepancy), incomplete
28 disposal records, and a departed employee still listed as active in Metrc (October 2023 audit).

1 Destruction logs missing agent card numbers and SOPs lacking reconciliation procedures
2 (February 2025 audit). Pretreated cannabis not tracked in Metrc via required processing jobs while
3 RadSource machine was actively in use (November 2025).

4 **I. Untagged, Unlabeled, or Unsecured Cannabis**

5 Unlabeled cannabis in an unsecured broom closet (May 2022); untagged whole flower in the
6 packaging room, corrected on site (December 2024); untagged cannabis inside the RadSource
7 machine (May 2025); in-process cannabis stored in an unsecured employee break room freezer
8 (November 2025).

9 **J. Substantiated CCB Investigation — Wastewater Health Hazard (June 2024)**

10 CCB investigation CMP-24-00093 substantiated that multiple floor sinks in flowering rooms
11 were incapable of draining properly, causing contaminated wastewater to pool throughout the
12 facility. Staff tracked wastewater throughout the premises. Sump pumps were used to manage the
13 problem without Board notification. The facility operated without an approved contingency plan,
14 in violation of NCCR 4.065.

15 7. Three letters of concern warning that the repetitive nature of the violations could lead to
16 disciplinary action were sent to the point of contact on February 26, 2024; April 14, 2025; and August
17 25, 2025.

18 **RELEVANT LAW**

19 8. NRS 678A.600(1) authorizes the Board, upon finding that a licensee has violated a
20 provision of Title 56 or any regulation adopted pursuant thereto, to: (a) limit, condition, suspend or revoke
21 the license; (b) impose a civil penalty not to exceed \$20,000 for a single violation; (c) take any
22 combination of the foregoing actions; (d) issue a warning; or (e) take no action.

23 9. NCCR 4.030(1) provides that the Board or a hearing officer may impose a civil penalty
24 of not more than \$20,000 per violation on any person who fails to comply with or violates any provision
25 of the NCCR or Title 56 of NRS. NCCR 4.030(2) directs that in determining the amount of any civil
26 penalty, the Board shall consider: the gravity of the violation; any economic benefit or savings resulting
27 from the violation; the size of the business; the history of compliance with the NCCR and Title 56 of
28

1 NRS; action taken to remedy the violation; the effect of the penalty on the ability to continue in business;
2 and any other matter as justice may require.

3 10. NRS 678B.510(6) requires that each cannabis establishment install a video monitoring
4 system which must, at a minimum: (a) allow for the transmission and storage, by digital or analog means,
5 of a video feed which displays the interior and exterior of the cannabis establishment; and (b) be capable
6 of being accessed remotely by a law enforcement agency in real-time upon request.

7 11. NCCR 4.040 provides that Category II violations, which are violations of a severity that
8 create a present threat to public health or safety, carry a presumptive civil penalty of not more than
9 \$25,000 and a suspension of not more than 20 days for a first offense within any three-year period.
10 Pursuant to NRS 678A.600(1)(b) as amended in 2023; civil penalties are capped at \$20,000 per single
11 violation. Category II violations include, without limitation, failing to maintain required security alarm
12 and surveillance systems. NCCR 4.040(1)(a)(14).

13 12. NCCR 4.050 provides that Category III violations are violations of a severity that create
14 a potential threat to public health or safety. They carry a presumptive civil penalty of not more than
15 \$10,000 for a first offense within any three-year period. Category III violations include, without
16 limitation: failing to keep any required records including seed-to-sale tracking requirements (NCCR
17 4.050(1)(a)(3)); failing to tag plants as required (NCCR 4.050(1)(a)(4)); failing to follow an approved
18 security plan (NCCR 4.050(1)(a)(5)); failing to tag cannabis or a cannabis product as required (NCCR
19 4.050(1)(a)(23)); storing or delivering a cannabis product outside the seed-to-sale tracking system
20 (NCCR 4.050(1)(a)(13)); and failure to maintain updated standard operating procedures (NCCR
21 4.050(1)(a)(27)).

22 13. NCCR 4.055 provides that Category IV violations are violations which create a climate
23 conducive to abuses associated with the sale or production of cannabis. They carry a presumptive civil
24 penalty of not more than \$5,000 for a first offense within any three-year period. Category IV violations
25 include, without limitation: improper storing of cannabis, cannabis products or other foods (NCCR
26 4.055(1)(a)(8)); failing to properly wash, rinse and sanitize product contact surfaces as required (NCCR
27 4.055(1)(a)(9)); failing to maintain hand-washing facilities that are stocked, accessible and limited to
28 hand washing only (NCCR 4.055(1)(a)(10)); infestation by pests that are not multigenerational or on

1 contact surfaces (NCCR 4.055(1)(a)(11)); failing to properly use sanitizer as required (NCCR
2 4.055(1)(a)(12)); and failing to comply with required employee training (NCCR 4.055(1)(a)(15)).

3 14. NRS 678A.520(1)(e) provides that if a respondent is alleged to have committed multiple
4 violations consisting of the same or a similar act, omission or course of conduct, those violations must
5 be charged as a single alleged violation if they are closely related in time, place and circumstance and
6 were all discovered in the course of a single audit, inspection or investigation. The violations within each
7 Count herein are charged accordingly.

8 VIOLATIONS

9 15. The following charges are based on violations identified in two 2025 enforcement actions:
10 the Follow-Up Routine Inspection conducted May 29, 2025 (SOD issued June 3, 2025); and the Routine
11 Inspection conducted November 6, 2025 (SOD issued December 5, 2025). All violations are charged as
12 first offenses. Prior Statements of Deficiency addressing the same or similar violation categories are
13 presented as aggravating factors in Section II and within each Count below, establishing that Respondent
14 had notice of each deficiency category and failed to achieve lasting compliance.

15 **Count I -- Follow-Up Routine Inspection | May 29, 2025 | SOD Issued: June 3, 2025**

16 16. Investigating Agents: Michele Courtney, REHS, Cannabis Program Inspector III; Jason
17 Banales, REHS, Cannabis Program Supervisor

18 17. Location: 530 E. Pamalyn Avenue, Suite D/H, Las Vegas, NV 89119

19 18. Violation 1A, Cannabis Product Not Tagged as Required. During the inspection, CCB
20 agents observed whole cannabis flower/buds inside the RadSource machine with no identifying Metrc
21 tag. The product was also absent from the RadSource log. Staff stated the product was a failed lot being
22 prepared for remediation via a Remediation Status Entry in Accela. The associated Metrc tag and
23 explanation were provided by staff via email on June 3, 2025.

24 19. NCCR 6.080 requires adherence to the required inventory control seed-to-sale tracking
25 system. Cannabis product present on the premises without a Metrc tag and without a RadSource log entry
26 is not accounted for within that system.

27 20. This conduct constitutes a violation of NCCR 6.080.

1 21. A violation of NCCR 6.080 constitutes a Category III offense as defined under NCCR
2 4.050(1)(a)(23), failing to tag cannabis or a cannabis product as required. It carries with it a 1st Offense
3 Presumptive Maximum of \$10,000.00.

4 22. Violation 1B, Sanitizer Test Strips Not Readily Available at Three-Compartment Sink.
5 During the inspection, the facility did not have the designated sanitizer test strips (Quaternary
6 Ammonium) readily available at the three-compartment sink. The facility was asked to test the sanitizer
7 for practice purposes. A CCB agent provided his own Quaternary Ammonium test strips to the facility
8 for immediate use and to keep until the facility was able to order its own supply.

9 23. NCCR 10.040 requires cannabis establishments to adhere to requirements for the
10 appropriateness, cleanliness, and maintenance of equipment, utensils, and substances. Maintaining the
11 proper sanitizing solution and the means to verify its concentration is a basic requirement of this
12 provision.

13 24. This conduct constitutes a violation of NCCR 10.040.

14 25. A violation of NCCR 10.040 is a Category IV offense as defined by NCCR
15 4.055(1)(a)(12), failing to properly use sanitizer as required. It carries a 1st Offense Presumptive
16 Maximum fine of \$5,000.00.

17 26. Violation 1C, Materials Stored on Floor and Pest Entry Points Throughout Facility.
18 Several boxes were observed stored directly on the floor in the packaging room, creating pest harborage
19 conditions. Black and yellow bins were stored directly on the floor in the hallway (an employee moved
20 the bins to a rack at least 6 inches off the ground on May 30, 2025, correcting this specific item on site).
21 Fire sprinklers in the backroom were observed pushed into the ceiling creating a gap allowing pest access.
22 Holes were observed in the pesticide room and the finished packaging/vault room walls and ceiling,
23 allowing pest access.

24 27. NCCR 10.055 requires that the facility adhere to requirements for buildings used to
25 manufacture, process, package, and hold cannabis, including maintaining the building free of pest entry
26 points and ensuring materials are stored properly off the floor.

27 28. This conduct constitutes a violation of NCCR 10.055.

28

1 29. A violation of NCCR 10.055 constitutes a Category V offense under NCCR 4.060(1)(a).
2 It carries with it a 1st Offense Presumptive Maximum of a warning.

3 30. Violation 1D, Missing and Deteriorating Base Covering. Base covering was observed
4 missing in multiple flower rooms and in the backroom near the three-compartment sink, exposing gaps
5 between the floor and wall. Base covering was observed peeling in the clone room with a mold-like
6 substance accumulating between the wall and the base covering.

7 31. NCCR 10.060 requires the facility to maintain the building in a good state of repair.
8 Missing and peeling base covering creates gaps between the floor and wall that allow pest harborage and
9 accumulation of biological matter.

10 32. This conduct constitutes a violation of NCCR 10.060. Missing base covering was cited at
11 every routine inspection in this review period: May 2022, February 2023, December 2024, May 2025,
12 and November 2025. This is among the most persistently uncorrected structural deficiencies in the facility
13 across the entire four-year enforcement history.

14 33. A violation of NCCR 10.060 is a Category V offense as defined in NCCR 4.060(1)(a). It
15 carried a 1st Offense Presumptive Maximum of a warning.

16 **Count II — Routine Inspection | November 6, 2025 | SOD Issued: December 5, 2025**

17 34. Investigating Agents: Michele Courtney, REHS, Cannabis Program Inspector III; Alana
18 Holt-Hall, REHST, Cannabis Program Inspector II

19 35. Location: 530 E. Pamalyn Avenue, Suite D/H, Las Vegas, NV 89119

20 36. Violation 2A, Outdated Remediation Logs; Pretreated Cannabis Not Tracked in Metrc.
21 The facility had outdated remediation logs posted for materials dated 2023 and was unable to provide
22 current logs upon request while the RadSource machine was actively in use. Updated logs were provided
23 by VVG's compliance manager, Jason Heath, via email on November 20, 2025, who confirmed the
24 facility pre-treats some cannabis material using the RadSource machine. Additionally, VVG was not
25 tracking pretreated cannabis product in Metrc. All tags on the remediation log were not accurately
26 reflected in Metrc to show they had been pretreated using processing jobs as required per Metrc Bulletin
27 NV_IB_0101.

1 37. NCCR 6.080 requires adherence to the required inventory control seed-to-sale tracking
2 system. Failing to maintain current remediation logs and failing to record pretreated product in Metrc via
3 required processing jobs are material failures of this system.

4 38. This conduct constitutes a violation of NCCR 6.080. Metrc recordkeeping failures have
5 been identified across multiple prior enforcement actions: late entries and quantity variances (October
6 2023 audit SOD); incomplete disposal logs (February 2025 audit SOD); untagged cannabis in the
7 RadSource machine (May 2025 inspection SOD). The November 2025 finding that pretreated cannabis
8 was not being tracked in Metrc at all, while the RadSource machine was actively in use, represents an
9 escalation of prior recordkeeping deficiencies.

10 39. A violation of NCCR 6.080 is a Category III violation under NCCR 4.050(1)(a)(3), failing
11 to keep required records including seed-to-sale tracking requirements. It carries with it a 1st Offense
12 Presumptive Maximum of \$10,000.00.

13 40. Violation 2B, Failure to Maintain Required Security and Surveillance Systems; Facility
14 Entered Unchallenged. CCB agents entered the facility through an open roll-up door without being
15 stopped or questioned by security personnel or any employee. Once inside the facility, agents discovered
16 there were no security personnel monitoring the entrance. After several minutes, agents had to instruct
17 an employee to contact upper management. Additionally, VVG was unable to provide requested
18 screenshots for multiple cameras, including a camera facing the back exit door, a camera in the dry room,
19 and 30 days of surveillance footage from the RadSource room, because the cameras were offline or
20 completely inoperative at the time of the request.

21 41. NRS 678B.510(6) requires each cannabis establishment to install a video monitoring
22 system capable of displaying the interior and exterior of the establishment and of being accessed remotely
23 by a law enforcement agency in real-time upon request. Multiple cameras being entirely inoperative,
24 including cameras covering a rear exit and an active remediation area, directly violates this requirement.
25 NCCR 6.085 requires cannabis establishments to adhere to required security measures to prevent
26 unauthorized access and to maintain operable surveillance equipment.

27 42. This conduct constitutes a violation of NRS 678B.510(6) and NCCR 6.085. VVG had
28 notice of surveillance system deficiencies from two prior enforcement actions: a camera obstructed by a

1 tarp (May 2022 SOD, NCCR 6.085(2)(b)); and a camera in Dry Room 2 found improperly installed and
2 obstructed in the February 2025 audit SOD (NRS 678B.510(6); NCCR 6.085(2)(b)). The November 2025
3 inspection reveals a significant escalation; cameras are no longer merely obstructed but entirely
4 inoperative across multiple coverage areas, and no security personnel were present at the facility entrance.
5 This escalating pattern of surveillance failure, despite prior notice, is a significant aggravating factor.

6 43. A violation of NRS 678B.510(6) or NCCR 6.085 is a Category II offense under NCCR
7 4.040(1)(a)(14), failing to maintain required security alarm and surveillance systems. It carries a 1st
8 Offense Presumptive Maximum of \$25,000 and/or suspension not more than 20 days (capped at \$20,000
9 per NRS 678A.600(1)(b)).

10 44. Violation 2C, Handwashing Sink Used for Purposes Other Than Handwashing. The only
11 designated handwashing sink located outside of a restroom was observed with utensils, including
12 trimmers and bowls; and personal items, including car keys and an inhaler, sitting on and around the sink,
13 with used towels inside the basin, demonstrating the sink was being used for purposes other than
14 handwashing.

15 45. NCCR 6.095(1)(b) requires cannabis establishments to adhere to requirements for the
16 building used as a cannabis establishment, including maintaining a properly designated and exclusively
17 used handwashing sink.

18 46. This conduct constitutes a violation of NCCR 6.095(1)(b). In the December 2024 routine
19 inspection, VVG removed the facility's only designated handwashing sink without CCB approval (NCCR
20 6.060; NCCR 4.065), triggering an imminent health hazard designation and voluntary self-closure. The
21 sink was reinstalled as a condition of resuming operations. The November 2025 inspection found that the
22 reinstated sink was rendered functionally unusable by accumulated equipment and personal belongings,
23 effectively replicating the prior condition by different means.

24 47. A violation of NCCR 6.095(1)(b) constitutes a Category IV offense under NCCR
25 4.055(1)(a)(10), failing to maintain hand-washing facilities stocked, accessible and limited to hand
26 washing only. This violation carried a 1st Offense Presumptive Maximum of \$5,000.00.

1 48. Violation 2D, In-Process Cannabis Stored in Unsecured Break Room Freezer. In-process
2 cannabis material was observed stored in a freezer located in the employee break area that was not secured
3 with limited access controls.

4 49. NCCR 10.025(3)(b) requires adherence to written procedures for labeling and packaging
5 materials, including maintaining appropriate access controls over cannabis storage. Cannabis stored in
6 an unsecured break room freezer is accessible to persons who are not required to be authorized agents
7 and is outside the controlled storage environment required by the NCCR.

8 50. This conduct constitutes a violation of NCCR 10.025(3)(b). Unsecured and unlabeled
9 cannabis in unauthorized locations has been documented across multiple prior enforcement actions:
10 unlabeled cannabis in an unsecured broom closet (May 2022 SOD); untagged whole flower in the
11 packaging room (December 2024 SOD); untagged cannabis in the RadSource machine (May 2025 SOD).
12 VVG had notice that cannabis must be properly secured, labeled, and stored in authorized locations.

13 51. A violation of NCCR 10.025(3)(b) is a Category III offense under NCCR 4.050(1)(a)(13),
14 storing or delivering a cannabis product outside the seed-to-sale tracking system. It carried a penalty of
15 a 1st Offense Presumptive Maximum of \$10,000.00.

16 52. Violation 2E, Fire Sprinkler Gaps Allowing Pest Access; Ceiling Peeling in Pesticide
17 Room. Large gaps were observed around fire sprinklers throughout the cultivation facility, allowing pest
18 access. The ceiling in the pesticide room was observed peeling and falling off. VVG provided photo
19 documentation via email on November 6, 2025, confirming the ceiling had been corrected.

20 53. NCCR 10.055 requires the facility to adhere to requirements for buildings used to
21 manufacture, process, package, and hold cannabis, including maintaining the building free of structural
22 conditions that allow pest entry.

23 54. This conduct constitutes a violation of NCCR 10.055. Fire sprinkler ceiling gaps creating
24 pest access were cited in both the May 2025 inspection SOD and this November 2025 inspection SOD.
25 VVG had notice of this specific deficiency from the May 2025 SOD and failed to correct it prior to the
26 November 2025 inspection.

27 55. A violation of NCCR 10.055 is a Category V offense as defined by NCCR 4.060(1)(a). It
28 carried a 1st Offense Presumptive Maximum of a warning.

1 security personnel at the facility entrance, conditions that represent a direct threat
2 to the integrity of regulatory oversight.

3 B. History of Compliance. Eleven enforcement actions over four years
4 document persistent, facility-wide non-compliance across every major compliance
5 category — security, recordkeeping, sanitation, building maintenance, and cannabis
6 tracking. The Section II history demonstrates that VVG has received notice of every
7 violation category charged in this Complaint through prior Statements of Deficiency
8 yet has failed to achieve lasting compliance in any of them.

9 C. Action taken to remedy prior violations. VVG submitted Plans of
10 Corrective Action following each prior Statements of Deficiency that were approved
11 by the Board. The violations charged herein recurred notwithstanding those
12 approved plans, indicating that VVG's corrective actions were either not
13 implemented effectively or not sustained. In the case of the sanitizer test strips
14 (Violation 1B), the recurrence occurred even after a voluntary self-closure triggered
15 by related conditions. In the case of the handwashing sink (Violation 2C), the
16 reinstated sink was rendered functionally unusable within months of reinstallation.

17 62. The CCB further recommends that the Board consider imposing the following
18 additional conditions on Respondent's license pursuant to NRS 678A.600(1)(a) and (c):

19 A. Increased inspection frequency — no fewer than three unannounced
20 routine inspections in the 12 months following the Board's written decision.

21 B. A compliance monitor, designated by the Board, with authority to
22 conduct periodic unannounced reviews of Respondent's security camera systems and
23 Metrc recordkeeping; and

24 C. Such further conditions, limitations, or restrictions on the license as the
25 Board deems necessary to protect public health and safety and ensure ongoing
26 compliance with Nevada cannabis regulations.

1 **PRAYER FOR RELIEF**

2 63. WHEREFORE, based on the allegations and recommendations contained herein, which
3 constitute reasonable cause for disciplinary action against Respondent, Petitioner prays for relief as
4 follows:

5 A. The CCB fines the Respondent a monetary sum within the parameters of NRS
6 678A.600(1)(b) for each violation of the provision of Title 56 of the NRS or the NCCR.

7 B. That the CCB act against the Respondent’s license C006, under the parameters of
8 NRS 678A.600(1)(a); and,

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

11 **NOTICE TO RESPONDENT**

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

16 **PLEASE TAKE NOTICE**, you, as the Respondent, **must Answer this Complaint within**
17 **twenty (20) days after service of this Complaint, unless granted an extension.** Pursuant to NRS
18 678A.520(2), in the Answer Respondent:

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

20 (b) Must admit or deny the facts alleged in the Complaint.

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

23 (d) Must affirmatively set forth any matter which constitutes an avoidance or affirmative defense,

24 (e) May demand a hearing. **Failure to demand a hearing constitutes a waiver of the right to**
25 **a hearing and to judicial review of any decision or order of the Board**, but the Board may order a
26 hearing even if the Respondent so waives its right.

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

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

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

15 Michael Miles, Acting Executive Director
16 Cannabis Compliance Board
17 700 E. Warm Springs Rd, Suite 100
18 Las Vegas, NV 89119
19 MMiles@ccb.nv.gov

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

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

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

4 If you do not wish to dispute the charges and allegations set forth herein, within thirty (30) days
5 of the service of this Complaint, Respondent may pay the civil penalties set forth above in the amount of
6 \$60,000.00 on notice to:

7 Michael Miles, Acting Executive Director
8 Cannabis Compliance Board
9 700 E. Warm Springs Rd, Suite 100
10 Las Vegas, NV 89119

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

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

19 DATED this 2 day of JULY, 2026.

20 STATE OF NEVADA,
21 CANNABIS COMPLIANCE BOARD

22 By: 

23 Michael Miles, Executive Director
24 Nevada Cannabis Compliance Board
25 700 E. Warm Springs Rd, Suite 100
26 Las Vegas, NV 89119

27 AARON D. FORD, Attorney General

28 By:  on 7/2/26

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