

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

3 STATE OF NEVADA, CANNABIS
4 COMPLIANCE BOARD,

5 Petitioner,
6 vs.

Case No. 2026-010

7 NLV MAYFLOWER HOLDINGS LLC,
8 Respondent.

9 **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND EMERGENCY ORDER OF**
10 **SUMMARY SUSPENSION**

11 This matter came before the Cannabis Compliance Board, State of Nevada (the
12 “CCB”), on June 25, 2026, pursuant to NRS 233B.127. The Executive Director of the CCB,
13 having reviewed the evidence presented, now hereby enters the following Findings of Fact,
14 Conclusions of Law, and Emergency Order of Summary Suspension:

15 **FINDINGS OF FACT**

16 1. NLV MAYFLOWER HOLDINGS LLC (“MAYFLOWER” or “Respondent”),
17 cannabis establishment number C145, holds a Cultivation Facility License, License
18 Number: [REDACTED]. MAYFLOWER acquired its license on November 14,
19 2023. MAYFLOWER is located at [REDACTED].

20 2. On April 15th, 2026, Board Agent Yosmely Lopez Bravo (“Agent Bravo”) initiated
21 a routine compliance audit of the MAYFLOWER establishment. Additionally, Board Agent
22 Meiny Trisno (“Agent Trisno”) prepared a Cultivation and Inventory Review.

23 3. As part of the audit process Agent Bravo, along with Board Agent Reid Sakai,
24 conducted a field audit of the MAYFLOWER establishment on June 11, 2026. A follow-up
25 field audit was conducted on June 17, 2026, by Agent Bravo and Board Agents Michael
26 Hogan, Meiny Trisno, Amir Bringard, and Michele Courtney.

27 4. MAYFLOWER was identified as having inventory accountability failures and non-
28 compliance with statutes and regulations. As will be discussed in the following paragraphs,

1 MAYFLOWER had harvested cannabis that was not labeled and tracked as required
2 pursuant to statute and regulation. MAYFLOWER did not have proper employment
3 records and allowed individuals without active agent cards to work in the facility.
4 MAYFLOWER was not complying with security procedures required by statute and
5 regulation. Additionally, the cannabis cultivation activity is suspicious in its process and
6 output.

7 5. During the physical inspection, board agents observed 17 container totes totaling
8 126.18 pounds of harvested cannabis. This cannabis lacked harvest information and
9 METRC (the state's seed-to-sale tracking system) inventory tags, preventing traceability
10 to authorized harvest batches. When asked about the lack of labeling, MAYFLOWER staff
11 stated that they distinguish the contents by the smell and appearance of the cannabis.

12 6. A review of records from METRC showed the establishment had processed
13 approximately 45 harvests, totaling for a total of approximately 9,284 pounds of harvested
14 cannabis (wet weight) since acquiring their license. From those harvests, the facility
15 created 151 packages totaling approximately 800 pounds. This reflects a final harvest yield
16 of 9%. For context, the industry average harvest yield for comparable operations during the
17 same timeframe is 21%. The facility's yield therefore falls 12 percentage points below the
18 industry average. When comparing the deficit proportionally, the facility's yield is 57.14%
19 lower than the industry standard. Of the 800 pounds of packaged cannabis, approximately
20 293 pounds were reported as having been destroyed, providing the reason "Destroy old
21 product to make room." Of the remaining approximately 507 pounds, none of that cannabis
22 was ever recorded as being sold, resulting in no documented revenue associated from the
23 harvested material, nor was it ever tested.

24 7. Additionally, Agent Bravo reviewed inventory reports submitted by
25 MAYFLOWER. Cecily Qi stated that the most recent inventory reports were submitted
26 under Zhaohang Ou's (50% member) Agent Card Accela accounts (██████████ - expired
27 and ██████████ - active). Q4-2025 and Q3-2025 were reported under the expired agent
28 card, but Q1-2026 was reported under the active agent card. For Q1-2026 a total of 136

1 packages were reported; however, 5 were duplicates, resulting in a net total of 131
2 packages. Of these, 104 packages (77%) were previously reported in prior quarterly reports
3 with the same weight at least once. Additionally, some packages were included in a
4 quarterly report, excluded from one or more subsequent reports, and later reported again
5 with identical quantities.

6 8. MAYFLOWER's point of Contact is Cecily Qi. Cecily Qi listed on an Audit
7 Questionnaire that their Security Director is Hung Ha and has listed him on an employee
8 list as the Chief Operating Officer.

9 9. However, Hung Ha requested removal from his position as an officer and from the
10 company license effective June 30, 2025. A review of licensing records shows that there is
11 no active agent card associated with Hung Ha, and his most recent agent card was cancelled
12 due to inactivity in May 2026. There is no other individual listed as a security director or
13 manager.

14 10. While speaking with Agent Bravo over the phone, Hung Ha verbally stated that
15 he is not the security director, is not affiliated with the company in any management
16 capacity and does not provide employee training or conduct semi-annual audits. He further
17 indicated that he does not receive any monetary compensation from the business. Mr. Ha
18 explained that his sole involvement is operating the security cameras when requested,
19 despite not having an active agent card. Currently, the facility does not have an active
20 security agent and could provide no explanation for this discrepancy.

21 11. As to those security cameras, during the initial visit on June 11, 2026, Agent Bravo
22 requested that Cecily Qi retrieve 30 days of surveillance footage, however, she was unable
23 to do so. Because Cecily Qi could not demonstrate that the surveillance system retained 30
24 days of footage, Agent Bravo then suggested retrieving the previous 7 days instead. Cecily
25 Qi was able to access 7 days of footage. This, however, is well below the amount required
26 pursuant to regulation of 30 days' worth of footage. Four days later, on June 15, 2026,
27 MAYFLOWER was able to email screenshots dated May 16, 2026.

28 12. Based on the foregoing evidence of a failure to properly log inventory within

1 METRC, the suspicious activity related to the claims of destruction of their inventory and
2 low yield, and a failure to have proper security measures in place, MAYFLOWER imposes
3 an immediate threat to the public's health, safety, and welfare. MAYFLOWER has failed
4 to properly secure and track cannabis which would allow for the diversion of cannabis and
5 cannabis products to enter the illicit market.

7 CONCLUSIONS OF LAW

8 13. As MAYFLOWER holds privileged License issued by the CCB, MAYFLOWER is
9 subject to the jurisdiction of the CCB pursuant to NRS 678A through 678D and NAC 678A
10 through 678D.

11 14. Pursuant to NRS 678A.005(5), the Nevada Legislature found and declared to be
12 the public policy of this State that "[a]ll ... cannabis establishment agents must be licensed,
13 controlled and assisted to protect the public health, safety, morals, good order and general
14 welfare of the inhabitants of the State, to foster the stability and success of the cannabis
15 industry and to preserve the competitive economy and policies of free competition of the
16 State of Nevada."

17 15. NAC 678A.515(1)(b)(15) (formerly NCCR 4.035(1)(a)(15)) provides, in pertinent
18 part, "[c]ategory I violations are of a severity that make a person ineligible to receive,
19 renew, or maintain a license, including, without limitation: (15) ... diversion of cannabis or
20 cannabis products."

21 16. NAC 678A.515(2)(b) (formerly NCCR 4.035(2)(b)) provides that "a single violation
22 of NAC 678A.515(1)(b)(15) (formerly NCCR 4.035(1)(a)(15)) for diversion of cannabis or
23 cannabis products requires revocation of a license or cannabis establishment agent
24 registration card."

25 17. NAC 678A.520 (formerly NCCR 4.040) provides in pertinent part, "[c]ategory II
26 violations are violations of a severity that create a present threat to public health or safety,
27 including, without limitation: ... (14) [f]ailing to maintain required security alarm and
28 surveillance systems"

1 18. NAC 678B.220(1)(c)(3)(III) (formerly NCCR 6.085 (1)(c)(3)(III)) requires that a
2 cannabis establishment has security equipment to include video cameras which are capable
3 of being accessed remotely by a law enforcement agency in real time.

4 19. NAC 678B.220(1)(c)(3)(VI) (formerly NCCR 6.085(1)(c)(3)(VI)) requires that a
5 cannabis establishment has security equipment to include a "method for storing video
6 recordings from the video cameras for at least 30 calendar days ..."

7 20. 18. NAC 678B.220(1)(c)(7) (formerly NCCR 6.085(1)(c)(6))requires that a
8 cannabis establishment must employ a security manager or director.

9 21. NAC 678A.525 (formerly NCCR 4.050) provides in pertinent part, "[c]ategory III
10 violations are violations of a severity that create a present threat to public health or safety,
11 including, without limitation: ... (3) [f]ailing to keep any required records, including seed-
12 to-sale tracking requirements.

13 22. NRS 233B.127(3) provides, in pertinent part, that "...[i]f the agency finds that
14 public health, safety or welfare imperatively require emergency action, and incorporates a
15 finding to that effect in its order, summary suspension of a license may be ordered pending
16 proceedings for revocation or other action. An agency's order of summary suspension may
17 be issued by the agency or by the Chair of the governing body of the agency. If the order of
18 summary suspension is issued by the Chair of the governing body of the agency, the Chair
19 shall not participate in any further proceedings of the agency relating to that order.
20 Proceedings relating to the order of summary suspension must be instituted and
21 determined within 45 days after the date of the order unless the agency and the licensee
22 mutually agree in writing to a longer period."

23 23. Based on the foregoing factual findings and the preponderance of the evidence, the
24 Executive Director of the CCB has determined emergency action is required to protect
25 public health, safety, or welfare, and the issuance of this Emergency Order of Summary
26 Suspension is imperatively required to protect the public health, safety, or welfare.

27 **ORDER REGARDING SUMMARY SUSPENSION**

28 For good cause appearing to the Executive Director for the CCB, the Executive

1 Director of the CCB finds that the public health, safety, or welfare imperatively requires
2 emergency action to warrant the issuance of an Emergency Order of Summary Suspension
3 for NLV MAYFLOWER HOLDINGS LLC' License listed in Paragraph 1 above.

4 Pursuant to NRS 233B.127(3) this Emergency Order of Summary Suspension is
5 effective immediately.

6 MAYFLOWER must ensure cannabis and cannabis product at the Facility is secure
7 during the Summary Suspension as outlined herein. Upon service of this Emergency Order
8 of Summary Suspension, all persons must exit the Facility, and no person may enter the
9 Facility except to secure the Facility or water properly METRC tagged cannabis growing
10 inside the Facility, until the Summary Suspension is lifted.

11 Additionally, in accordance with NAC 678B.220(1)(c)(3)(III), MAYFLOWER must
12 provide all required log-ins, credentials, or other related information to allow the CCB to
13 remotely access MAYFLOWER's video camera system.

14 Pursuant to NRS 233B.127(3), unless stipulated otherwise, proceedings relating to
15 the order of summary suspension must be instituted and determined within 45 days after
16 the date of the order. As such, the Hearing on this Summary Suspension is scheduled to
17 take place **August 6, 2026, at 9:00 AM** at the CCB offices located at **700 E. Warm Springs**
18 **Road, Room 123, Las Vegas, Nevada 89119**. At this Hearing, the Board shall determine
19 whether the summary suspension shall be lifted or shall remain in place, pending further
20 proceedings for revocation or other action.

21 **IT IS SO ORDERED.**

22 DATED: June 25th, 2026

**STATE OF NEVADA,
CANNABIS COMPLIANCE BOARD**

23
24 By: 

25 Michael Miles, Executive Director CCB
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