

Green Leaf Medical, LLC	*	THE MARYLAND CANNABIS
d/b/a The Cannabist Company	*	ADMINISTRATION
Respondent	*	
	*	
License Nos. GA-23-00012 and	*	Case No. 24-00477
PA-23-00011		
* * * * *	*	* * * * *

CONSENT ORDER

On August 20, 2025, the Maryland Cannabis Administration (“MCA” or the “Administration”), pursuant to the Cannabis Reform Act (the “Act”), codified at Alcoholic Beverages and Cannabis Article, § 36-501, *et seq.* (2023) and Code of Maryland Regulations (COMAR) 14.17 (2024) issued administrative charges to **Green Leaf Medical, LLC d/b/a The Cannabist Company** (“Respondent”), license numbers **GA-23-00012 and PA-23-00011**, for the reasons set forth herein.

The relevant portions of the Act are as follows:

§ 36-202. Powers and duties of Administration

(a) The Administration shall:

(7) after a determination that a violation of this title or a regulation adopted under this title has occurred, suspend, fine, restrict, or revoke cannabis licenses and cannabis registrations, whether active, expired, or surrendered, or impose any other penalty authorized by this title or any regulation adopted under this title;

* * *

§ 36-1102. Prohibitions on sale and distribution

* * *

(b)(1) A person may not sell or distribute a product intended for human consumption or inhalation that contains more than 0.5 milligrams of tetrahydrocannabinol per serving or 2.5 milligrams of tetrahydrocannabinol per package unless the person is licensed under § 36-401 of this title and the product complies with the:

(iii) packaging and labeling standards established under § 36-203 of this title.

The relevant provisions of COMAR are as follows:

14.17.14 Complaints, Enforcement, Record Keeping and Inspections of Cannabis Businesses.

.04 Discipline and Enforcement.

A. Diversion.

(1) A licensee, registrant, or agent may not:

- (a) Divert cannabis or cannabis products for any unauthorized sale or distribution;
- (b) Fail to maintain records in accordance with this subtitle or the licensee's standard operating procedures;
- (c) Fail to accurately track, tag, or otherwise record inventory in the seed-to-sale tracking system; or
- (d) Sell or dispense cannabis or cannabis products in a manner that:
 - (i) Exceeds the personal use amount of cannabis or cannabis products;
 - (ii) Is reasonably expected to be in violation of the personal use amount; or
 - (iii) Could otherwise reasonably give rise to any other violation of law.

* * *

14.17.20 Prohibited Acts

.02 Prohibitions.

E. Samples.

(1) A licensed business may not provide samples of cannabis or cannabis product unless authorized by this section.

(2) Under this section, samples are only authorized from a licensed business to:

- (a) Another licensed business;
- (b) An employee, owner, or agent of another licensed business; or
- (c) An employee, owner, or agent of the licensed business.

(3) Trade Samples.

(a) Trade samples shall only be provided by licensed growers and processors and shall be:

- (i) Provided solely for the purpose of business-to-business marketing;
- (ii) Recorded in the Administration's seed-to-sale system;
- (iii) Packaged and labeled in accordance with COMAR 14.17.18;

* * *

(4) Employee Samples.

(a) Employee samples shall only be provided by a licensed business to an employee of the licensed business and shall be:

- (i) Provided solely for the purpose of employee education;
- (ii) Recorded in the Administration's seed-to-sale system;
- (iii) Packaged and labeled in accordance with COMAR 14.17.18;

* * *

In lieu of proceeding to an evidentiary hearing on the Charges, the Parties hereby agree to resolve this matter by way of this Consent Order.

Findings of Fact

1. Respondent holds licenses to operate a cannabis grow facility (License No. GA-23-00012) and a cannabis processor facility (License No. PA-23-00011), both of which are located in Frederick, Maryland.
2. On November 25, 2024, an MCA investigator conducted a partial compliance inspection at Respondent's grow facility.

3. Prior to conducting the inspection, the investigator queried MCA's seed-to-sale system, METRC, for package adjustments recorded by the licensee and found that between October 29, 2024 and November 25, 2024, there were 22 adjustments to cannabis flower packages with entries that stated "employee samples."
4. According to one of Respondent's managers, N.H., the adjustments of cannabis flower were related to: (1) trade samples affiliated with the Highly Haunted Mansion Event; (2) employee samples affiliated with an employee-only Harvest Event where samples were distributed on-site, but not consumed; and (3) employee samples provided to five managers on-site during the period of November 11, 2024 and November 25, 2024.

Harvest Event

5. The Harvest event occurred on November 1, 2024 and marked the licensee's 300th cannabis harvest.
6. According to N.H., 60 employees were distributed approximately 458 grams of packaged cannabis flower as they were departing the facility.
7. Though the transactions were recorded in METRC as employee samples, the individual employee names were not recorded in METRC, and, instead, Manager N.H. maintained an Excel spreadsheet listing the employees to whom the cannabis flower was distributed.
8. Respondents identified that the source of their confusion stemmed from METRC Support Bulletin Number MD-IB-0090 (the "METRC Sampling Guidance"), which required, among other things, that a notation within METRC be made to identify the nature of the adjustment, i.e., "employee sample," as well as a required note for an Employee Name and MCA Badge Number.

9. Based on Respondents' review of the METRC Sampling Guidance, Respondents believed that the individual making the entry and/or overseeing the sampling was the person to be listed within METRC, as opposed to the individual ultimately receiving the sample.
10. To remedy this error, Respondent subsequently updated the METRC records to confirm each individual employee that received an employee sample during the Harvest Event.
11. Based upon a reconciliation of the original entries, the Excel spreadsheet, and the updated METRC entries, MCA is satisfied that there was no cannabis diversion associated with the Harvest Event.
12. Moreover, Respondents have implemented an updated standard operating procedure clarifying for its registered agents the appropriate and compliant method for recording employee sampling.

Highly Haunted Mansion Event

13. Respondent sponsored the Highly Haunted Mansion event ("Halloween event") at the Overhills Mansion in Cantonsville, Maryland on October 30, 2024. Invitations were sent exclusively to Maryland registered cannabis agents, and the event was intended as a business-to-business marketing event. Attendees were required to register for the event as stated in the electronic invitation.
14. According to the event notice, registrants would receive a ticket to attend the event. Attendees were required to show photo ID and confirmation that they were on the Event Registrant List. Respondent was told by the event coordinator that technical difficulties prevented it from maintaining an attendance list.

Respondent's Grow Facility

15. In the days leading up to Halloween, Respondent's METRC entries for its **grow facility** show that:
- a. On October 29, 2024, registered cannabis agent L.P. received 189 grams of finished cannabis flower products for "Halloween samples;" and,
 - b. On October 30, 2024, registered cannabis agent R. M. received 532 grams of finished cannabis flower products for a "Halloween event."
16. In sum, Respondent's grow facility agents received **721 grams** of finished cannabis flower products for redistribution at the Halloween event.
17. Respondent's agent, N.H., entered three METRC entries on October 31, 2024 indicating that 151 grams of cannabis was returned to Respondent's grow facility from the Halloween Event.

Respondent's Processor Facility

18. In addition, Respondent's METRC entries for its **processor facility** show that on October 28, 2024, Respondent's agent L.P. received 15 each of infused edibles totaling 1500 mg (each edible contained 100 mg); 49 each of vape carts totaling 46.5g; and 12 each of concentrates totaling 10.5g (by weight). In sum, Respondent's processor agents received a total of **76 finished products** for redistribution at the Halloween event.
19. Per a December 9, 2024 communication to the MCA's investigator, Respondent provided the following information regarding the Halloween event:

- a. In addition to the 532 grams of cannabis flower samples from the Respondent's **grow facility**, 76 manufactured cannabis product samples from Respondent's **processor facility** were transported to the event and distributed;
- b. All samples were transported to the event location by Respondent's agents in their personal vehicles, causing them to be in violation of Md. Code Ann., Crim. L. § 5-101, which limits the amount of cannabis one may have in one's possession for "civil use";

- c. A dispensary employee, a cannabis patient, and at least four unregistered event coordinator employees distributed the samples at various stations of the event;
 - d. A registered agent for another processor also distributed samples at the event; and
 - e. Respondent's rolling station at the event was created by emptying finished 14 gram packages of flower onto a tray for attendees to use to roll their own joints.
20. As a result of the 14 gram packages being opened and emptied, these samples were not appropriately packaged when received as samples by attendees.
21. Respondent's grower and processor facilities distributed to its agents a combined total of cannabis of 721 grams of finished cannabis flower along with 76 finished products between October 28 - 30, 2024 for redistribution at the Halloween Event.
22. MCA's investigator subsequently learned that some individuals who were not MCA-registered cannabis agents did in fact register for the event, some of whom did obtain access to the event, with the investigation concluding that two (2) individuals that were not MCA-registered cannabis agents did in fact receive samples of cannabis products.

Manager Samples

23. In addition, the investigator also determined that Respondent's grow facility manager, P.D., had distributed a total of 105 grams of flower cannabis between November 11 and November 25, 2024 as employee samples to a group of five managers, although it was initially only recorded in Metrc as one distribution to himself in excess of the possession limit. While none of these samples exceeded the personal possession limit, and while all were appropriately packaged, Respondents acknowledge that some of these products may not have been appropriately labeled as required by COMAR for employee samples

Mitigation

24. Respondent was cooperative with the MCA's investigator and promptly and transparently responded to his inquiries.
25. Respondent asserts that its violations stem from its good faith misunderstanding of the Metrc Sampling Guidance, and that, upon being corrected by the MCA, Respondent updated METRC to appropriately comply with the Administration's regulations.
26. Respondent also voluntarily implemented a new Standard Operating Procedure (SOP) relating to Trade and Employee Samples. Respondent has further voluntarily agreed since January of 2025 to forego hosting any events, such as the Halloween Event, for 2025.
27. As it relates to the Halloween Event, Respondent was only informed by the event organizer after the event that it was unable to maintain a list of attendees due to technical difficulties on-site, and any unused product from the event was transported back to the licensed premises and reentered into inventory.
28. Respondent violated COMAR 14.17.14.04.A.(1)(c) and COMAR 14.17.20.02.E(3) and E(4) by failing to appropriately maintain records within METRC of the individuals that received trade samples at the Halloween Event, Harvest Event, and Manager Sampling Event.
29. Respondent violated COMAR 14.17.20.02E(2) during the Halloween Event by failing to maintain appropriate oversight of the event such that samples were provided to two (2) non-employee individuals and for permitting samples to be distributed by unregistered individuals.
30. Respondents violated Md. Code Ann., Alc. Bev. § 36-1102(b)(1)(iii) and COMAR 14.17.14.04(1)(d) at its Halloween Event by allowing samples to be distributed by

unregistered individuals and in amounts in excess of 0.5 milligrams of tetrahydrocannabinol (THC) per serving or 2.5 milligrams of THC.

31. Respondents violated COMAR 14.17.20.02.E(4)(a)(iii) by permitting samples to be distributed at the Halloween Event that were subsequently removed from their proper packaging and labeling prior to being distributed to MCA-registered agents.

32. Respondents violated COMAR 14.17.20.02.E(4)(a) by distributing samples which were not labeled in accordance with COMAR 14.17.18 in connection with the Manager Sampling Event.

ORDER

By agreement of the parties, it is hereby

ORDERED that within 30 days of this Consent Order, Respondent shall pay a monetary penalty to the Compassionate Use Fund in the amount of \$33,000 as a single consolidated fine for all violations referenced herein; and it is further

ORDERED that within 30 days of the date of this Consent Order that Respondent shall provide the MCA with proof that its managers have successfully completed at least five (5) hours of inventory training, to include properly updating METRC inventory related to employee and/or trade sampling, which may include in-house developed training on Respondent's sampling SOP and/or or other third-party training platforms; and it is further

ORDERED that Respondent's grow and processor facilities shall **CEASE AND DESIST** from hosting any dedicated events (similar to the Halloween Event) whereby Respondent dispenses employee or trade samples for at least **ONE YEAR** from the date of this Consent Order; for the avoidance of any doubt, Respondent may still dispense employee and/or trade samples provided they are recorded compliantly in Metrc; and it is further

ORDERED that within thirty (30) days, Respondent's grow and processor facilities shall submit, and MCA shall review and approve, a Standard Operating Procedure for determining whether the amount dispensed to an adult use customer exceeds the personal use limit under Maryland law, which may be incorporated into Respondent's sampling SOP.

12-2-25

Date



Tabatha Robinson
Director

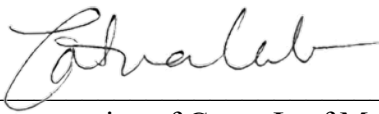
CONSENT

I, Tatiana Calvo, am a representative of Green Leaf Medical, LLC d/b/a The Cannabis Company (“Respondent”), and I have legal authority to enter into this agreement on behalf of Respondent. Respondent acknowledges that it had the opportunity to seek advice of counsel in this matter. By this Consent, Respondent agrees and accepts to be bound by this Consent Order and its conditions and restrictions. Respondent waives any rights it may have had to contest the Findings of Fact and Conclusions of Law.

Respondent acknowledges the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which the Respondent would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on its own behalf, and to all other substantive and procedural protections as provided by law. Respondent acknowledges the legal authority and the jurisdiction of the Administration to initiate these proceedings and to issue and enforce this Consent Order. Respondent also affirms that it is waiving its right to appeal any adverse ruling of the Administration that might have followed any such hearing.

I sign this Consent Order with authority and on behalf of Respondent and having consulted with counsel, Respondent fully understands and comprehends the language, meaning and terms of this Consent Order, without reservation, and understands its meaning and effect.

Date: December 1, 2025



Representative of Green Leaf Medical, LLC
d/b/a The Cannabis Company

NOTARY

STATE OF COLORADO

COUNTY OF JEFFERSON,

Sworn to and subscribed before me on this 1st day of December 2025, by Tatiana Calvo,
on behalf of Green Leaf Medical, LLC, and gave oath in due form of law that the
foregoing Consent Order was her voluntary act and deed.



Notary Public

My Commission Expires: July 23, 2028

