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(4) Plant Tagging and Entry into Seed-to-Sale Tracking System.

(a) For each plant, as soon as practical, a grower shall:

- (i) Create a unique identifier for each plant;
- (ii) Assign each plant to a batch;
- (iii) Enter information regarding the plant into the seed-to-sale tracking system;
- (iv) Create a tag with the unique identifier and batch number;
and
- (v) Securely attach the tag to a plant container or plant.

(b) A tag shall be:

- (i) Indelible and tamper-evident; and
- (ii) Made of a material that resists variation in temperature and moisture.

* * *

(5) Control of Harvested Cannabis. A grower shall:

* * *

- (b) At least monthly, conduct a physical inventory of the stock and compare the physical inventory of stock with the stock reflected in [the] seed-to-sale tracking system.

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

.04 Discipline and Enforcement

C. A licensee or registrant may not substantially deviate or demonstrate a pattern of deviation from:

(1) Its standard operating procedures[.]

* * *

.05 Fines and Suspension Proceedings

* * *

B. A licensee, registrant, or agent who violates Regulation .04 of this chapter or COMAR 14.17.20 is subject to fine of up to \$10,000 per violation.

C. Each day a violation continues is a separate violation under this section.

The MCA and Curio Cultivation hereby enter into this Pre-Charge Consent Order in order to resolve this matter in lieu of proceeding with a formal evidentiary hearing.

FINDINGS OF FACT

1. At all times relevant hereto, Curio Cultivation, LLC (“Respondent”) operated a cannabis grow facility in the state of Maryland under license number **GA-23-00010**, located in Timonium, Maryland.
2. On September 11, 2024, MCA investigators conducted an unannounced inspection at Respondent’s facility.

3. The investigators performed a plant count of all mature plants in the facility utilizing the MCA-issued METRC RFID scanner (“scanner”) which had uploaded Respondent’s most up-to-date METRC¹ inventory information earlier that morning from METRC’s system. At least one member of Respondent’s staff was present during the inspection.
4. Respondent’s agents are responsible for inputting the number of plants into the METRC system and maintaining accurate plant and location data in METRC.

Flower Room 1A

5. The plant count began in Flower Room 1A. Per the METRC data in the scanner, there should have been 510 mature plants in this room.
6. Although all 510 plants were in Flower Room 1A, investigators identified one mature plant without the required METRC tag affixed to it. The investigator has since confirmed that the untagged plant was green wasted.

Flower Room 2A

7. The investigators next inspected Flower Room 2A. Per the data in the METRC scanner, there should have been 1131 mature plants in Flower Room 2A.
8. However, the scanner and a physical count showed there were only 1071 plants present, one of which did not have a METRC tag affixed to it. Respondent has since confirmed the untagged plant was green wasted. Thus, 60 mature plants were missing from Flower Room 2A.

¹ METRC is the State’s seed-to-sale tracking system, which is required to be used by all cannabis processors, growers, and dispensaries to maintain accurate distribution and location information of all cannabis products.

9. Respondent's staff informed MCA investigators that 60 plants had been moved from Flower Room 2A to another flower room approximately five weeks prior, on August 8, 2024.
10. Respondent's Standard Operating Procedure (SOP) titled Month End Physical Inventory Counts for Cannabis Containing Material includes procedures for conducting a month end physical inventory count.
11. Thus, Respondent failed to adhere to its SOP when conducting its August 30, 2024 inventory and for five weeks thereafter.
12. On or about November 19, 2024, the MCA issued a Letter of Non-Compliance to Respondent and requested a Plan of Correction related to the violations alleged in the investigative report.
13. On December 2, 2024, Respondent submitted a Plan of Correction to the MCA in response to the Letter of Non-Compliance and in the format requested by the MCA.
14. On December 18, 2024, the MCA informed the Respondent that the Plan of Correction was satisfactory.

CONCLUSIONS OF LAW

15. Respondent has violated COMAR 14.17.10.03C(1) by failing to enter accurate data into METRC.
16. Respondent has violated COMAR 14.17.10.03C(4)(a) by failing to affix or maintain unique METRC RFID tags to two mature plants.
17. Respondent has violated COMAR 14.17.10.03C(5)(b) by failing to record in METRC that 60 plants had been relocated to a different room within the licensed premises.
18. Respondent has violated COMAR 14.17.14.04C(1) by failing to adhere to its own SOPs for inventory management on August 30, 2024.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, and in light of the fact that Respondent has implemented a satisfactory Plan of Correction, it is hereby


ORDERED that Respondent shall schedule another plant inventory within 10 days from the date the Consent Order is executed by both parties and provide video footage to the MCA if any untagged plants are discovered and green wasted as a result of that inventory²;

ORDERED that Respondent shall pay a monetary fine in the amount of **\$3,000** directly to the Maryland Cannabis Administration's Compassionate Use Fund within 10 days of the date of this Order; and be it further

ORDERED that Respondent shall be responsible for the costs associated with complying with this Order; and it is further

ORDERED that this Consent Order is a PUBLIC DOCUMENT pursuant to Md. Code Ann., Gen. Prov. §§ 4-401 et seq (2019 Repl. Vol. and 2021 Supp.).

7-21-2025
Date


Tabatha Robinson, Executive Director
Maryland Cannabis Administration

² To be clear, the parties agree that any untagged plants shall be green wasted in accordance with Respondent's SOP.

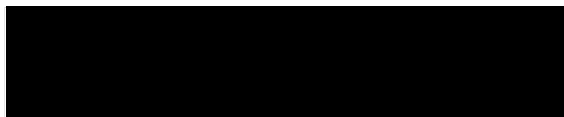
CONSENT

I, David Bronfein, am a representative of Curio Cultivation, LLC, a Maryland limited liability company, and I have legal authority to enter into this agreement on behalf of Curio Cultivation, LLC (hereinafter 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.


7/17/2025
Date

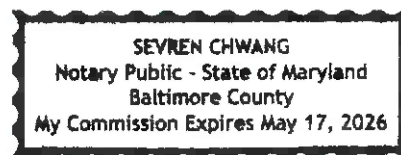

David Bronfein, General Counsel,
on behalf of Curio Cultivation, LLC

NOTARY

IN THE COUNTY OF Baltimore, Sworn to and subscribed before me
on this 17th day of July 2025, by David Bronfein, on behalf of Curio
Cultivation, LLC, and gave oath in due form of law that the foregoing Consent Order was his
voluntary act and deed. S/He has produced a Driver's License as identification.



Notary Public 



My Commission Expires: May 17, 2026