

IN THE MATTER OF

*** BEFORE THE MARYLAND**

Eugene Walker

*** CANNABIS ADMINISTRATION**

Respondent

*** Case No. 24-00094**

*** * * * ***

FINAL DETERMINATION AND ORDER

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STATEMENT OF THE CASE

On June 21, 2024 the Maryland Cannabis Administration (MCA or the Administration) issued a Notice of Intent to Permanently Revoke Cannabis Agent Registration (the Revocation Notice) to Eugene Walker (Respondent), registration numbers AG-001026 and AG-008305¹ under authority granted in Md. Code Ann. Alcoholic Beverages & Cannabis § 36-202(a)(7) (2023). The Revocation Notice alleged that “Respondent’s actions of taking cannabis flower from Holistics without authorization and with the presumption of intending to distribute it is a clear violation of COMAR 14.17.14.04”² and informed the Respondent of his right to request a

¹ At all times incident to the investigation and prior to March 1, 2024, Mr. Walker was employed by Holistic Industries, LLC and registered with the MCA under agent number AG-001026. For a later undetermined period, Mr. Walker was employed at a different cannabis licensee and registered under agent number AG-008305. He was not employed at either licensee at the time the evidentiary hearing was held.

² At times incident to the investigation, emergency regulations were in effect. The COMAR cites herein refer to those emergency regulations published Friday, July 14, 2023 in the Maryland Register, Volume 50 Issue 14.

hearing, in accordance with §36-202(a)(8)(i) of the Act and COMAR 14.17.14.05. See Revocation Notice. Respondent timely requested a hearing via email on July 26, 2024.

Authority and delegation to hold a hearing in this matter is granted to the MCA by Md. Code Ann., Alc. Bev. § 36-202(a)(8) and § 36-202(b)(2). Procedure in the hearing was governed by Md. Code Ann., State Gov't § 10-101 *et seq.*, COMAR 14.17.22 and COMAR 28.02.01.

The evidentiary hearing was initially scheduled for Thursday, September 26, 2024. The MCA moved for postponement, citing witness unavailability. The evidentiary hearing was rescheduled to Monday December 9, 2024³ to be held remotely per COMAR 14.17.22.09E. The MCA was represented by Francesca Gibbs. Respondent appeared *pro se*.

ISSUE

- 1) Did Eugene Walker violate COMAR § 14.17.14.04A(1)(a) by diverting cannabis or cannabis products from Holistic Industries, LLC (Holistic) without authorization?

SUMMARY OF THE EVIDENCE

Exhibits

A complete list of exhibits offered and admitted into evidence is attached to this Decision as Appendix A. In short summary:

- MCA offered sixty exhibits which were admitted into evidence, including
 - fifty-three surveillance videos
 - an investigative report with two supplements
 - security and shipping reports generated by Holistic
 - a correlation between surveillance videos and the security and shipping reports generated by Holistic
 - Respondent's government identification card.
- Respondent offered twelve exhibits which were admitted into evidence, including
 - A receipt for cannabis purchased
 - nine text messages and one email relating to Respondent's duties at Holistic
 - one other text message

³ The order issued on the motion contained a typographical error, setting the matter for December 8, 2024 (a Sunday). No party raised the matter, and all communications between the parties and the hearing officer indicated the correct date of Monday, December 9, 2024.

Testimony:

MCA presented testimony from Richard Hill, the initial investigator assigned to the case by the MCA, and Christopher Holland, the MCA investigator who completed the investigation. Mr. Walker testified on his own behalf.

Exhibits not admitted to evidence:

Respondent offered two additional documents, which were not admitted into evidence. Respondent also presented a voicemail message he wished to submit for consideration, but was unable due to technical constraints. The non-admitted documents exist as part of the case record, but were not taken into consideration for this decision. COMAR 28.02.01.22. Mr. Walker testified as to the contents of the voicemail message (Transcript, pp 149-150), with no objection raised from the MCA.

FINDINGS OF FACT

Having considered all of the evidence presented, I find the following facts by a preponderance of the evidence:

1. On February 14, 2024, the MCA received an anonymous complaint stating that employees and management at the Holistic Industries, LLC (Holistic) licensed cannabis grower facility were covering up diversion and moldy flower issues.
2. On February 22, 2024, MCA Investigator Richard Hill appeared on-site at the Holistic facility and requested surveillance video footage.
3. On February 28, 2024, Holistic management informed Investigator Hill that, while reviewing the requested video footage, Holistic personnel found evidence of diversion.
4. The MCA's investigation into Respondent Eugene Walker arose out of the MCA's review of the Holistic surveillance footage.
5. Respondent Eugene Walker was employed as a facility administrator at the Holistic Industries, LLC licensed grower facility as of November 15, 2023.
6. Respondent's duties included shipping and receiving.
7. In fulfilling his duties, Respondent from time-to-time entered a room at the Holistic facility known as the second floor packaging room.
8. The second floor packaging room is a secure area restricted by key card access.
9. At all hours, the second floor packaging room regularly contains both empty containers for the packaging of cannabis flower, and sealed, filled containers of cannabis flower.
10. Empty containers for the packaging of dried cannabis flower arrive in the second floor packaging room in bulk in cardboard cartons.
11. It is customary in the second floor packaging room for empty containers to remain in cardboard cartons.

12. It is customary in the second floor packaging room for sealed, filled containers of cannabis flower to be placed in plastic crates.
13. Logs show that on no fewer than twenty-two occasions between January 6, 2024 and February 29, 2024, Respondent used his key card to access the second floor packaging room.
14. Logs show that on no fewer than thirty-three occasions between January 6, 2024 and February 29, 2024, Respondent shipped items on behalf of Holistic via FedEx.
15. Respondent shipped empty cannabis flower packaging containers, cannabis flower container labels, and cannabis literature via FedEx.
16. Respondent was responsible for sending out FedEx packages which were already filled by other Holistic employees, and also for sending out FedEx packages which he filled himself.
17. Respondent was not authorized to ship sealed, filled containers of cannabis flower.
18. On January 27, 2024, Respondent used his key card to access the second floor packaging room, filled a FedEx envelope with items from plastic crates containing sealed, filled containers of cannabis flower, exited the second floor packaging room, and exited the building with the same FedEx envelope.
19. On February 10, 2024, Respondent used his key card to access the second floor packaging room, filled a FedEx envelope with items from plastic crates containing sealed, filled containers of cannabis flower, exited the second floor packaging room, and exited the building with the same FedEx envelope.
20. On February 17, 2024, Respondent used his key card to access the second floor packaging room, filled a FedEx envelope with items from plastic crates containing sealed filled containers of cannabis flower, exited the second floor packaging room, and exited the building with the same FedEx envelope.
21. Following an internal investigation by Holistic, including review of security logs and video footage and reconciling Respondent's shipping activities with Respondent's key card access to the second floor packaging room, Respondent was terminated by Holistic on March 1, 2024.

DISCUSSION

Burden and Standard of Proof

This is a contested case which involves allegations by the Administration that Respondent violated law and/or regulation; therefore, the burden is on the Administration to prove the violation by a preponderance of the evidence. COMAR 14.17.22.D(1)-(2). The preponderance of the evidence standard requires that, taking all admitted evidence into consideration, the presenter of evidence has proven "that something is more likely so than not so." *Coleman v. Anne Arundel Cnty. Police Dep't*, 369 Md. 108, 125 (2002).

The Administration's contentions

The MCA submitted videos of the second floor packaging room into evidence, along with records of Respondent's key card access to that room and a log of Respondent's FedEx shipping activities, all of which were admitted without objection. The MCA contends that the videos clearly show cannabis product being diverted. It also contends that, by correlating Respondent's shipping activity and access to the second floor packaging room, the evidence shows that Mr. Walker had neither reason, nor authority, to be in the second floor packaging room at the times shown in the videos, and therefore, the videos constitute proof of diversion. At the conclusion of its case, the MCA moved for judgement, which was denied.

The Respondent's Contentions

Mr. Walker contends that the videos do not show diversion, but instead show him selecting empty packaging, labels, and literature for shipping. Mr. Walker relies on selected texts, which he asserts show other employees of Holistic instructing him to send out empty packaging, labels, and literature, and on refuting the testimony of Inspectors Hill and Holland as regards the contents of the cardboard cartons and plastic crates.

Analysis

Surveillance Videos

In presenting its case, the MCA relies heavily on surveillance videos, as described through the testimony of Investigators Hill and Holland. The videos are mostly from three locations within the Holistic Industries, LLC licensed cannabis grower facility: 1) the second floor packaging room, where dried cannabis flower is packaged into various containers; 2) a first-floor hallway which adjoins the security vestibule at the entrance to the facility; 3) the security vestibule at the entrance to the facility. Most videos from the second floor packaging room are followed-up by videos several minutes later from the first-floor hallway and the security vestibule. I relied on the investigators' description of the surveillance video to highlight the types of packages and placement of objects, as the camera inside the second floor packaging room captures a birds-eye view, which distorts the image, and the lighting in many of the videos is poor. See e.g. MCA ex 60.

During the evidentiary hearing, the MCA presented ten videos described by Investigator Hill. After those ten videos had been reviewed in the hearing, the MCA moved to admit a total of thirty-nine additional videos, which it proffered depicted similar scenes of the Respondent's activities. There was no objection to any of the videos by Respondent. The MCA further presented one video described by Investigator Holland, and moved to admit that plus three additional videos which it proffered depicted similar scenes, for a total of fifty three videos of surveillance footage from the second floor packaging room, the first floor hallway, and the security vestibule at the Holistic licensed grower facility. The videos were all admitted without objection. I reviewed all fifty-three videos in depth.

The MCA further relies on the investigators' assessment of the contents of the containers removed from the second floor packaging room by Mr. Walker, based on their knowledge of the industry in general (T. 54:2-5) and of Holistic's procedure. (T. 108:2-12). Throughout the videos, the room contains several metal tables, many stacks of cardboard cartons, and plastic crates which are both stacked and free-standing.

Investigators Hill and Holland testified to Holistic's cannabis flower packaging procedures as carried out in the second floor packaging room; specifically, that empty containers come into the room in cardboard cartons, that dried cannabis flower is weighed and packaged into these containers, that the filled containers are sealed, and that the filled and sealed containers are placed in the plastic crates, to be removed at an unspecified later time. (T. 24:8-19, T. 105-108). No video of this packaging process was submitted; however, in many videos, open cardboard cartons sit on the tables. These cartons contain orderly rows of containers in individual protected compartments. See e.g. MCA Exhibit 30. By comparison, the contents of the plastic crates are haphazard.

Respondent did not contradict the entirety of the investigators' testimony regarding the procedures in the second floor packaging room. He testified that not all of the plastic crates contained filled and sealed containers (T. 146-147), and he called into question whether Holistic's procedure, as testified to by Investigator Hill, of leaving filled sealed packages of cannabis flower in the packaging room, rather than in a secure vault, were in violation of an unspecified regulation, but did not dispute that this was the practice.

Upon questioning by the Respondent, the Investigators acknowledged that they could not be certain of the type and weight of product in the filled and sealed containers, or whether the containers described in one video were sealed. (T. 113:11).

Activity Logs

The MCA presented two logs⁴ produced and created by Holistic: 1) a log of Respondent's FedEx shipping activities dating from November 15, 2023 through March 1, 2024; 2) a log correlating Respondent's shipping duties with video footage of Respondent's access to the second floor packaging room dating from January 6, 2024 through February 29, 2024 (together, admitted as MCA exhibit 85). The MCA contends that Respondent did not have a reason to be in the packaging room during some of the times shown on video. In response, the Respondent testified:

I had a lot of job responsibilities. I did not always mail out those things and do those things that day. So, there was a lot of time, and I believe you will even see

⁴ The MCA also presented a log of Respondent's keycard access dating from February 17, 2024 through March 1, 2024; however, due to the short time frame of the log and the fact that Mr. Walker admitted to being the person shown in the surveillance videos (T. 171:10) this log was redundant.

and note, that a lot of those days I did were on Saturdays, when nobody was there, because that way they didn't know that I hadn't already mailed it out. All they see is, when I provided a tracking number that day, it looks like it got mailed out that day, but it did not. I had so much to do, I could not do everything in one day. So, some of those days I was not able to mail out that same day, which is why I would come in on a Saturday when nobody is there, put it in packaging and then mail it out. (T. 148-49)

While the MCA suggests that Respondent's presence in the second floor packaging room, absent a correlating shipping date, is evidence of Respondent's access to the room being unsanctioned, the Respondent's testimony is supported by the logs which show many shipping dates which do not have corresponding video dates. For instance, examining the January dates from the correlated log: January 4, 8, 10, 11, 16, 22, 25, 25, and 30 are listed as shipping dates, while January 6, 9, 10, 16, 17, 18, 20, 22, and 27 are listed as dates with video footage of Respondent entering the second floor packaging room. In all, the various logs show twenty-two instances of Respondent entering the room, and thirty-three separate shipping activities carried out by Respondent.

Allegations of Diversion

I examined the surveillance videos and took all testimony into consideration in evaluating whether the Respondent was fulfilling packaging orders, as he claimed, or alternatively, was the Respondent's presence in the second floor packaging room unsanctioned. Stating this differently, did the MCA prove diversion, by a preponderance of the evidence, by demonstrating Respondent's presence and activities on video were not reasonably ascribed to his shipping duties, either because he clearly was removing cannabis product, or because there was no proximate shipping date to the activity? For reasons set forth below, I answer affirmatively and believe the MCA has proven their case regarding several dates.

First, I think it helpful to examine an occasion where the MCA contends the Respondent diverted product, but I did not find accordingly. For example, in MCA Exhibit 43, which is surveillance video taken January 18, 2024 at 7:04 pm, the Respondent is seen entering the second floor packaging room, printing out labels, taking containers from cardboard cartons, and placing both the containers and the labels into a FedEx envelope. The MCA offered this video as an example of diversion, and in its Exhibit 85 highlights this date as not correlating to any sanctioned shipping activity; however, the MCA testimony shows that the cardboard cartons customarily contain empty packaging. Taking into account Respondent's unrefuted testimony (see above) regarding why the dates he fulfilled his shipping duties did not always match the date on which the request was made of him, or the date on which the tracking number was generated, along with the proximate shipping dates shown on the log of January 16 and January 22,⁵ the

⁵ Neither the MCA nor the Respondent indicated whether the dates in the correlated log corresponded to actual shipping dates or to the dates on which the tracking number was

MCA has not shown that it is “more likely so than not so” (*Coleman*, 125) that its Exhibit 43 constitutes an instance of diversion.

Another example is MCA Exhibit 53, which is surveillance video taken February 1, 2024 at 7:07 pm. The Respondent is seen entering the second floor packaging room, crossing to a table on which there are two plastic crates side-by-side, removing one handful of items from one of the crates, and placing it into a FedEx envelope. He then crosses the room to a stack of plastic crates. Due to the video quality, low lighting, and the Respondent’s position between the camera and the crates, there is no discernable motion by the Respondent, or any other visual evidence, to show that he removed anything from the stacked plastic crates. In reference to an unspecified video, the Respondent testified “the crates that are stacked on top of each other in those videos, those are the finished project. The crates that I go to have empty packaging on them, or they just have the labels that we needed to get sent out to them.” (T. 147:1-5). The MCA did not refute this testimony. Taking into account Respondent’s unrefuted testimony regarding the unstacked crates, and regarding the shipping dates, along with the proximate shipping dates shown on the log of January 30 and February 5,⁶ the MCA has not shown that it is “more likely so than not so” that its Exhibit 53 constitutes an instance of diversion.

After a thorough examination of the logs and all of the surveillance videos, I cannot support the MCA’s allegation that the Respondent diverted cannabis on more than twenty occasions (T. 92)⁷; however, I identified three dates that I am unable to correlate to sanctioned behavior, either by log or by video evidence. Those dates are January 27, February 10, and February 17, 2024.

On January 27, 2024, at 5:40 pm, Respondent enters the second floor packaging room, holding an unsealed FedEx envelope. He proceeds to a stack of plastic crates, which testimony has shown to hold filled sealed packages of cannabis product, and fills the envelope with approximately six handfuls of items. He inspects two other stacks of plastic crates and exits the room at 5:42 pm. At 6:18 pm, Respondent exits the facility via the first floor hallway, holding what appears to be the same FedEx envelope.

On February 10, 2024, at 6:55 pm, Respondent enters the second floor packaging room holding an unsealed FedEx envelope. He proceeds to a stack of plastic crates, which testimony

generated. Tuesday, January 16 and Monday, January 22 are both two business days from Thursday, January 18, 2024

⁶ See N. 5 *supra*. Tuesday January 30 and Monday February 5 are both two business days from Thursday, February 1, 2024.

⁷ The Revocation Notice alternately references the dates February 5, 12, 13, and 15 (Allegation of Fact No. 8), and “an almost daily basis for 110 days” (Allegation of Fact No. 13) of the Respondent diverting cannabis. I do not find diversion on the dates listed in the Revocation Notice; however, in light of the footnote following its “Allegations of Fact”, I based my review not just on the Notice, but on the allegations, evidence, and testimony presented at the hearing.

has shown to hold filled sealed packages of cannabis product, and fills the envelope with approximately three handfuls of items. He proceeds to another set of stacked plastic crates and adds three more handfuls of items to the same envelope. He proceeds to a third set of stacked plastic crates and adds one or two more handfuls of items, and exits the room at 6:57 pm. At 7:01 pm, the Respondent exits the facility via the first floor hallway and the security vestibule holding what appears to be the same FedEx envelope.

On February 17, 2024, at 4:30 pm, Respondent enters the second floor packaging room holding an unsealed FedEx envelope. He proceeds to a stack of plastic crates, which testimony has shown to hold filled sealed packages of cannabis product, and fills the envelope with approximately five handfuls of items from two different crates. He then crosses the room to another set of stacked plastic crates and adds one handful of items from one crate, and two handfuls of items from another crate. He then exits the room. At 7:08 pm, the Respondent exits the facility via the first floor hallway and the security vestibule holding an open cardboard box which contains what appears to be the same FedEx envelope.

The Respondent testified that Holistic suffered from a lack of organization. (T. 149-50, 161-62). He further testified, and introduced evidence to support the assertion that Holistic had singled him out to take the blame for the circumstances that triggered the MCA's investigation into Holistic. (T. 149-150, Respondent's Exhibit 6). While I find his testimony credible, I do not find that this line of testimony favors the Respondent. For example, in Respondent's Exhibit 6, a text message which the Respondent testified was received from a former coworker at Holistic, the texter's assertion that "everyone is guilty" is far from an assertion of Respondent's innocence. The various text messages instructing the Respondent in his duties show that he was a valued team member of Holistic, performing significant duties and with access to sensitive areas. Mr. Walker's own testimony along these lines *could* serve to support a conclusion that he knew of Holistic's shortcomings and was well-placed to take advantage of those shortcomings; it does not serve to refute the evidence of diversion supported by the testimony of the investigators, in conjunction with the video footage and compiled logs.

The record shows that Eugene Walker entered the second floor packaging room at least three times when he had no work-related reason to be there, removed items that, more likely than not, contained cannabis, without authorization, and exited the building with said items.

CONCLUSIONS OF LAW

I conclude as a matter of law that the Maryland Cannabis Administration has shown by a preponderance of the evidence that on January 27, 2024, February 10, 2024, and February 17, 2024, Respondent diverted cannabis in violation of COMAR 14.17.14.04A(1)(a).

ORDER

The MCA has requested as relief that Respondent's registration be permanently revoked. Md. Code Ann., Alc. Bev. § 36-202(a)(7) directs the Administration to revoke a registration or impose any other penalty authorized by the title or by relevant regulation when a violation is determined to have occurred. While a fine would be permissible pursuant to the statute, at the time of the hearing, Mr. Walker was unemployed and appeared *pro se*; thus I do not find that a fine is appropriate under these specific circumstances.

Therefore, to any extent that registrations AG-001026 and AG-008305 may continue to be active, revocation is appropriate and justified. As to the permanence requested, the MCA has sole authority to register cannabis agents under Alc. Bev. §36-501 and COMAR 14.17.15, and thus possesses the authority to deny any future application for registration by the Respondent. Therefore, based on the foregoing it is hereby:

ORDERED that registrations AG-001026 and AG-008305 are revoked; And it is further

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

3/10/2025
DATE



Jared T. Weissbrot, Hearing Officer

RIGHT TO APPEAL

Pursuant to COMAR 14.17.22.10(D), this Final Determination and Order exhausts all administrative remedies. COMAR 14.17.22.12 grants any party the right to appeal this determination to the Circuit Court for Anne Arundel County if done so within 30 days of receipt of this Order.

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IN THE MATTER OF

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Respondent

*** BEFORE THE MARYLAND**

*** CANNABIS ADMINISTRATION**

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*** * * * ***

APPENDIX A: LIST OF EXHIBITS

MCA's Exhibits

Ex. No.	Description	Ex. No.	Description
1.	Investigative Report, 2/22/24	29.	Holistic surveillance video from 2nd fl. packaging room, 11/9/23
2.	Supplemental Investigative Report, 9/17/24	30.	Holistic surveillance video from 2nd fl. packaging room, 11/16/23
3.	Holistic surveillance video from 2nd fl. packaging room, 1/10/24	31.	Holistic surveillance video from 2nd fl. packaging room, 11/20/23
4.	Holistic surveillance video from 1st fl. security vestibule, 1/10/24	32.	Holistic surveillance video from 2nd fl. packaging room, 11/21/23
6.	Holistic surveillance video from 2nd fl. packaging room, 2/5/24	33.	Holistic surveillance video from 2nd fl. packaging room, 1/9/24
7.	Holistic surveillance video from 1st fl. security vestibule, 2/5/24	34.	Holistic surveillance video from 1st fl. hallway, 1/9/24
8.	Holistic surveillance video from 1st fl. hallway near exit, 2/5/24	35.	Holistic surveillance video from 1st fl. security vestibule, 1/9/24
15.	Holistic surveillance video from 2nd fl. packaging room, 2/15/24	37.	Holistic surveillance video from 2nd fl. packaging room, 1/16/24
17.	Holistic surveillance video from 1st fl. hallway near exit, 2/15/24	38.	Holistic surveillance video from 1st fl. hallway, 1/16/24

39.	Holistic surveillance video from 1st fl. security vestibule, 1/16/24	54.	Holistic surveillance video from 1st fl. hallway, 2/1/24
40.	Holistic surveillance video from 2nd fl. packaging room, 1/17/24	55.	Holistic surveillance video from 1st fl. security vestibule, 2/1/24
41.	Holistic surveillance video from 1st fl. hallway, 1/17/24	56.	Holistic surveillance video from 2nd fl. packaging room, 2/6/24
42.	Holistic surveillance video from 1st fl. security vestibule, 1/17/24	57.	Holistic surveillance video from 1st fl. hallway, 2/6/24
43.	Holistic surveillance video from 2nd fl. packaging room, 1/18/24	58.	Holistic surveillance video from 1st fl. security vestibule, 2/6/24
44.	Holistic surveillance video from 1st fl. hallway, 1/18/24	60.	Holistic surveillance video from 2nd fl. packaging room, 2/10/24
45.	Holistic surveillance video from 1st fl. security vestibule, 1/18/24	61.	Holistic surveillance video from 1st fl. hallway, 2/10/24
46.	Holistic surveillance video from 2nd fl. packaging room, 1/20/24	62.	Holistic surveillance video from 1st fl. security vestibule, 2/10/24
47.	Holistic surveillance video from 1st fl. security vestibule, 1/20/24	66.	Holistic surveillance video from 2nd fl. packaging room, 2/17/24
48.	Holistic surveillance video from 2nd fl. packaging room, 1/22/24	67.	Holistic surveillance video from 1st fl. hallway, 2/17/24
49.	Holistic surveillance video from 1st fl. hallway, 1/22/24	68.	Holistic surveillance video from 1st fl. security vestibule, 2/17/24
50.	Holistic surveillance video from 1st fl. security vestibule, 1/22/24	70.	Holistic surveillance video from 2nd fl. packaging room, 2/21/24
51.	Holistic surveillance video from 2nd fl. packaging room, 1/27/24	71.	Holistic surveillance video from 1st fl. hallway, 2/21/24
52.	Holistic surveillance video from 1st fl. hallway, 1/27/24	72.	Holistic surveillance video from 1st fl. security vestibule, 2/21/24
53.	Holistic surveillance video from 2nd fl. packaging room, 2/1/24	73.	Holistic surveillance video from 2nd fl. packaging room, 2/24/24

74.	Holistic surveillance video from 1st fl. hallway, 2/24/24	80.	Holistic surveillance video from 1st fl. security vestibule, 2/26/24
75.	Holistic surveillance video from exterior front entrance, 2/24/24	81.	Second Supplemental Investigative Report, 11/18/24
76.	Holistic surveillance video from 1st fl. security vestibule, 2/24/24	82.	Summary Review of Video from Holistic Industries
77.	Holistic surveillance video from 2nd fl. packaging room, 2/26/24	83.	E. Walker's key card entries to the 2nd floor packaging room from Holistic Industries, 2/17/24 - 3/1/24
78.	Holistic surveillance video from 1st fl. hallway, 2/26/24	84.	Eugene Walker Washington, DC license
79.	Holistic surveillance video from exterior front entrance, 2/26/24	85.	Reports created by Holistic, 12/4/24

Respondent's Exhibits

Ex. No.	Description
1.	Receipt for purchase of cannabis, 2/5/2024
3.	Email exchange between Respondent and Holistic Management
4.	Text message exchange between Respondent and a Supervisor
5.	Text message exchange between Respondent and a Supervisor
6.	Text message exchange between Respondent and a former Holistic Co-worker
7.	Text message exchange between Respondent and a Supervisor
8.	Text message exchange between Respondent and a Supervisor
10.	Text message exchange between Respondent and a Supervisor
11.	Text message exchange between Respondent and a Supervisor
12.	Text message exchange between Respondent and a Supervisor
13.	Text message exchange between Respondent and a Supervisor
14.	Text message exchange between Respondent and a Supervisor