

IN THE MATTER OF	*	BEFORE A HEARING OFFICER OF
HIPPOCRATIC GROWTH	*	THE MARYLAND CANNABIS
HOLDINGS LLC, DBA ASH + EMBER	*	ADMINISTRATION
License No. DA-23-00055	*	Hearing Officer: Adam Stanzione
Respondent	*	Case Nos. 25-00333 and 25-00673
* * * * *	*	* * * * *

CONSENT ORDER

On October 20, 2025, the Maryland Cannabis Administration (the “Administration” or “MCA”) issued administrative charges in **Case No. 25–00333** to Respondent **HIPPOCRATIC GROWTH HOLDINGS LLC DBA ASH + EMBER, License No. DA-23-00055** (“Respondent”), pursuant to the Cannabis Reform Act, codified at Md. Code Ann., Alcoholic Beverages & Cannabis §§ 36-501, *et seq.* (2023, 2025 Supp.) (the “Act”) and Code of Maryland Regulations (COMAR) 14.17, *et seq.* (2024).

In addition, the MCA issued a Letter of Noncompliance (LONC) and Cease and Desist to Respondent on February 10, 2026 in **Case No. 25-00673**. The pertinent provisions of the Act in place at the time of the events described herein 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;

§ 36-903. Prohibitions on advertising; age verification

(a)(1) An advertisement for a cannabis licensee, cannabis product, or cannabis-

related service may not:

* * *

(v) except as provided in paragraph (2) of this subsection, engage in advertising by means of placing an advertisement on the side of a building or another publicly visible location of any form, including a sign, a poster, a placard, a device, a graphic display, an outdoor billboard, or a freestanding signboard.

(2) A cannabis business may place exterior signage on the premises of the business for the limited purpose of identifying the business to the public.

The pertinent provisions of COMAR in place at the time of the allegations set forth herein are as follows:

14.17.12 Cannabis Dispensary Operations

* * *

.04 Dispensary Operations

B. Dispensing Adult-Use Cannabis (7) Sales Limits.

(a) A dispensary agent may not knowingly dispense to an individual an amount of cannabis or cannabis products greater than the personal use amount under Criminal Law Article, §5-101, Annotated Code of Maryland, in a single day

(b) For the purposes of calculating the personal use amount of cannabis that can be dispensed, an individual may not purchase more than:

(i) 1.5 ounces of usable cannabis products as defined in COMAR 14.17.01;

(ii) 12 grams of concentrated cannabis products; or

(iii) Edible cannabis products, capsules, and tinctures that do not exceed 750 milligrams of tetrahydrocannabinol.

(c) For the purpose of determining sales limits under this subsection, cannabis vaporizing devices shall be weighed and considered as concentrated cannabis products.

D. The Administration may fine, suspend, restrict, revoke, or otherwise sanction any cannabis licensee or registrant for:

- (1) Any violation of Alcoholic Beverages and Cannabis Article, Title 36, Annotated Code of Maryland;
- (2) Any violation of this subtitle;

.07 Product Returned for Destruction and Disposal of Green Waste.

B. Disposal of Green Waste. A dispensary may either:

* * *

- (2) Dispose of such material in accordance with the dispensary's approved waste disposal plan.

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:

* * *

- (c) Fail to accurately track, tag, or otherwise record inventory in the seed-to-sale tracking systems;

- (d) Sell or dispense cannabis or cannabis products in a manner that:

- (i) Exceeds personal use amount of cannabis or cannabis products;

* * *

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

- (1) Its standard operating procedures;

* * *

D. The Administration may fine, suspend, restrict, revoke, or otherwise sanction any cannabis licensee or registrant for:

- (1) Any violation of Alcoholic Beverages and Cannabis Article, Title 36, Annotated Code of Maryland;

- (2) Any violation of this subtitle;

.05 Fines, Hearings, and Suspension

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

.06 Advertising

A. All advertisements for cannabis products, businesses, licensee, or other cannabis related services shall comply with the requirements of the Alcoholic Beverages and Cannabis Article, §§36-901-36-903, Annotated Code of Maryland.

Respondent timely requested a hearing in both matters, and on April 17, 2026, Hearing Officer Stanzone granted the Parties's Joint Motion to Consolidate the cases. Thereafter, the Parties agreed to resolve both cases with this Consent Order in order to avoid the need for formal proceedings, to include an evidentiary hearing. Upon execution of this Consent Order, the Parties agree to file a stipulated dismissal of both cases.

FINDINGS OF FACT

The parties agree to the following statement of facts:

Case No. 25-00333

1. Respondent is a Maryland-licensed dispensary, License No.: DA 23-00055, and at all times relevant to Case No. 25-00333, was located at 202 Coursevall Drive, Suite 108, Centreville, Maryland 21617 (the "Dispensary").

2. On July 8, 2025, an MCA investigator conducted an unannounced inspection of the Dispensary at this location.

3. The investigator reviewed the Dispensary's sales in Metrc between April 1, 2025 and June 30, 2025 and identified three (3) adult-use consumer sales of edibles in excess of the personal use amount of 750 mg as follows:

a. On May 3, 2025, agent K.M. sold 800 mg of infused edibles; which is .5 grams in excess of the legal personal use amount;

b. On May 25, 2025, agent M.M. sold 800 mg of infused edibles, which is .5 grams in excess of the legal personal use amount; and

c. On June 8, 2025, Agent B.S. 800 mg of infused edibles, which is .5 grams in

excess of the legal personal use amount.

4. The investigator also reviewed the Dispensary's Standard Operating Procedures ("SOPs") for handling Green Waste. The relevant portions of the SOPs state the following:

...

B. All waste that is identified as product to be returned to a licensed grower or processor shall be manifested back to the [G]rower and [P]rocessor within seven (7) calendar days of the items documented on the *Cannabis Green Waste Log*.

C. All product not manifested back to a licensed grower or processor shall immediately be rendered unusable, entered into the Waste Log and placed into the Waste Container. This action shall clearly be captured on video.

5. During the investigator's inventory inspection, it was noted that the product with Metrc tag 1A40303000003EA000060384, Dr. Solomons Tincture 200mg - Restore Exempt, expired on May 23, 2025. A review of the history of the package revealed that there were two sales of this product after it expired. The sales occurred on May 25, 2025 and June 14, 2025.

6. The investigator also reviewed video footage from May 28, 2025, which shows an adult consumer returning a 1 gram vape (METRC tag 1A403030000012E000087250, Strawberry Lemonadez Distillate Cartridge Hellavated - Vape Cart - 1.0 g).

7. The video also showed Respondent's agent S.S. completing a "Product Return Form" where he wrote, "Reason for Return: "OTHER - Wanted disposable/wrong product (not defective or adverse reaction." Once the return and the Product Return Form was completed, the product was given to Agent M.U.

8. Respondent's agent, M.U. wrote in the handwritten Green Waste Log, "Reason for Green Waste - wrong product"; "Disposal- Yes"; "Action Taken - Smashed"; "Verifying Agent: KT." However, the video footage showed M.U. took a photograph of the product that should have been green wasted and then put the returned product into a brown bag with handles. A short time

later, Agent M.U. handed the bag to another agent.

9. Agent M.U. also made a waste adjustment in Metrc to indicate that the product had been removed from the Dispensary's physical inventory.

10. Respondent conducted an investigation and drafted a report about the failure to properly green waste the product. The investigation included interviews with M.U., K.T., and N.S.

11. According to the report, M.U. said she did not remember the incident, was possibly distracted, and did not follow SOPs due to her Attention Deficit Disorder, Dyslexia and Dysgraphia.

12. The investigation also included a review of M.U.'s handling of product green wasted for the month preceding the incident, as well as a random audit of her adherence to green waste SOPs for two months prior to the incident. The review showed M.U. had followed the Dispensary's SOP on prior occasions.

16. Following the investigation, the Dispensary took remedial actions, which included:

- a. The immediate removal of M.U. from all Green Waste and Sample Distribution responsibilities;
- b. M.U. being suspended for three (3) days without pay;
- c. N.S. losing her employee discount for two (2) weeks; and
- d. Mandating that M.U. and all other managers with Green Waste and Sample Distribution responsibilities must undergo retraining regarding the Dispensary's Green Waste SOP and Diversion.

Case No.: 25-00673

17. On December 25, 2025, MCA received a complaint about a large outdoor advertisement for the Dispensary on Route 50 in Queen Anne's County.

18. On December 29, 2025, an MCA investigator located the advertisement, a sign displaying "Ash & Ember Cannabis" at the top and "Weed Love to See You" directly beneath.

19. The advertisement was adjacent to Route 50 and located at what was purported to be the Dispensary's new location: 202 Pullman Crossing Road, Grasonville, MD 21638.

20. Two months after the placement of the advertisement, on February 26, 2025, Respondent submitted a change of location request to the MCA which identified the Dispensary's proposed new location as 202 Pullman Crossing Road, Grasonville, MD 21638.

21. Respondent's advertisement was located on a property 10 miles away from the ultimate Dispensary location¹ and was not limited to the identification of the business.

CONCLUSIONS OF LAW

22. Respondent's sale of edible products in excess of 750 milligrams on three separate occasions constitute three violations of COMAR 14.17.12.04.

23. Respondent's failure to dispose of green waste as required by its SOPs constitutes a violation of COMAR 14.17.12.07.

24. Respondent's failure to: a) accurately record the product that was supposed to be green wasted; and b) follow SOPs constitutes two violations of COMAR 14.17.14.04.

¹ Respondent's change of location request was approved on October 23, 2025.

25. Respondent's advertisement was located on a property 10 miles away from the Dispensary's location and was not limited to the identification of the business, in violation of Md. Code, Alc. Bev. §§ 36-903(a)(1)(v) and 36-903(2).

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby

ORDERED that Respondent shall, within 10 days of this Order, pay a fine in the amount of \$8,000; and it further;

ORDERED that Respondent shall be under probation for six (6) months following the execution of this Order, during which time Respondent shall:

- 1) submit monthly green waste logs to the MCA; and
- 2) submit surveillance footage randomly requested by the MCA of M.U. conducting green waste activities; and it is further

ORDERED that failure to comply with the terms of this Consent Order shall be deemed a violation of the Maryland Cannabis Reform Act and may result in additional enforcement action, including suspension of Respondent's license; and it is 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. Provis. §§ 4-101 et seq. (2024 Supp.).

6-12-2026

Date

Tabatha Robinson, Director
Maryland Cannabis Administration

CONSENT

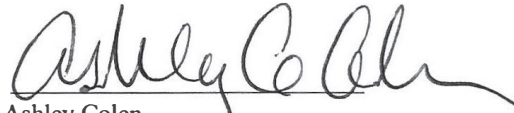
I, Ashley Colen (hereinafter "Respondent's Representative"), am over 18 years old and have legal authority to enter into this agreement on my behalf. Respondent's Representative acknowledges that she had the opportunity to seek advice of counsel in this matter. By this Consent, Respondent's Representative agrees and accepts to be bound by this Consent Order and its conditions and restrictions. Respondent waives any rights she may have had to contest the Findings of Fact and Conclusions of Law.

Respondent's Representative acknowledges the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which the Respondent's Representative would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on Respondent's own behalf, and to all other substantive and procedural protections as provided by law. Respondent's Representative acknowledges the legal authority and the jurisdiction of the Administration to initiate these proceedings and to issue and enforce this Consent Order. Respondent's Representative also affirms that she 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, I fully understand and comprehend the language, meaning and terms of this Consent Order, without reservation, and understand its meaning and effect.

5-26-26

Date



Ashley Colen
Respondent's Representative

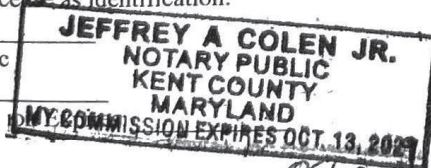
NOTARY



[Insert State]

Sworn to and subscribed before me, this 26 day of May 2026, by Ashley Colen, on behalf of Hippocratic Growth, d/b/a Ash + Ember and gave oath in due form of law that the foregoing Consent Order was her voluntary act and deed. She has produced a Driver's License as identification.

Notary Public



OCT 13, 2029