State of New Jersey
CANNABIS REGULATORY COMMISSION
P.O. BOX 216
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May 21, 2026

VIA CERTIFIED AND ELECTRONIC MAIL *to:* [redacted]
[redacted]
Brute's Roots LLC
[redacted]
[redacted]

Re: NOTICE OF VIOLATION –**Brute's Roots LLC; INV 44 2026**

Dear [redacted],

This letter is a Notice of Violation ("Notice"), issued by the New Jersey Cannabis Regulatory Commission ("NJ-CRC") in accordance with N.J.A.C. 17:30-20.4 to Brute's Roots LLC ("Brute's Roots"). An investigation which commenced on May 11, 2026, and remains ongoing as of the date of this Notice revealed Brute's Roots committed the following violations:

Use of Unauthorized Packaging and Labeling:

Violation 1: N.J.S.A. 24:6I-35a.(7)(a)(i) – Labeling and packaging requirements for cannabis items sold or distributed by a cannabis establishment, including, but not limited to, the affixing of a tracking stamp to containers or packaging as set forth in section 29 of P.L.2019, c.153 (C.24:6I-22) and requirements that:

(a) Cannabis items and cannabis paraphernalia are not packaged, branded, or marketed using any statement, illustration, or image that:

(i) Includes false, deceptive, or misleading statements

Violation 2: N.J.S.A. 24:6I-35a.(7)(d)(viii) - Labeling and packaging requirements for cannabis items sold or distributed by a cannabis establishment, including, but not limited to, the affixing of a tracking stamp to containers or packaging as set forth in section 29 of P.L.2019, c.153 (C.24:6I-22) and requirements that:

…

(d) Labeling rules that mandate clear identification of health and safety information, including, but not limited to:

…

(viii) Warning labels that include the nationwide toll-free telephone number used to access poison control centers that is maintained in accordance with 42 U.S.C. s.300d-71, as well as include, but are not limited to, one or more of the following statements, if applicable to a particular cannabis item:

…

-- "This product is intended for use by adults 21 years of age or older. Keep out of the reach of children";

Violation 3: N.J.A.C. 17:30-16.3(a)- A cannabis manufacturer shall ensure each package of unusable or usable cannabis or cannabis product contains all information set forth and printed directly on the package, affixed with a complaint label before transfer to another cannabis business.

Violation 4: N.J.A.C. 17:30-16.3(b)(5)- Direct printing on the package of, or labels affixed to, unusable cannabis packaged for the purposes of manufacturing of cannabis items shall include the following consumer safety and product information:

…

5. A sequential serial number, batch or lot number, and bar code to identify the batch or lot associated with cultivation or manufacturing;

Violation 5: N.J.A.C. 17:30-16.3(c)(1)(ii)- Labels affixed to cannabis items shall contain the following consumer warnings, as applicable, in no less than six-point font, unless otherwise noted:

1. For all finished cannabis items:

…

ii. "This product is intended for use by adults 21 years of age or older and not for resale. Keep out of the reach of children";

Violation 6: N.J.A.C. 17:30-16.3(d)- The cannabis business shall submit the label and any required form to the Commission for recordkeeping.

Violation 7: N.J.A.C. 17:30-16.5(a)(1)- (a) The packaging and labeling of cannabis items shall not contain any:

1. Statement, illustration, or image that includes false, deceptive, or misleading statements or promotes overconsumption;

Violation 8: N.J.A.C. 17:30-11.12(a)(1) and (5)- (a) A cannabis manufacturer shall designate a manufacturing supervisor who will be responsible for ensuring compliance with this subchapter, including ensuring that:

1. Cannabis products have been properly prepared, labeled, controlled, stored, sold, and distributed in accordance with the provisions of this standard;

2. All aspects of the manufacturing process are documented and that accurate manufacturing records for all cannabis products prepared by the cannabis manufacturer are maintained;

3. Manufacturing personnel are capable of, and qualified to perform, their assigned duties;

4. Ingredients used in manufacturing have their expected identity, strength, quality, and purity consistent with the requirements in this standard;

5. Cannabis products are manufactured with acceptable strength, quality, and purity, are packaged with appropriate packaging and labeling, and are prepared in accordance with good manufacturing practices pursuant to 21 CFR Parts 110 and 210, as applicable;

6. Critical processes are recorded and validated to ensure that procedures will consistently result in the expected strength, quality, and purity in the finished cannabis products;

7. The manufacturing environment is suitable for its intended purpose;

8. Appropriate stability testing pursuant to N.J.A.C. 17:30-19.5 is performed, or is determined from literature, for establishing reliable expiration dating to ensure that the finished cannabis products have their expected strength, quality, and purity, at least until the labeled expiration date;

9. Manufacturing conditions and standard operating procedures are in place to minimize the potential for errors; and

10. Adequate procedures and records exist for investigating and correcting failures or problems in manufacturing, quality control, or in the cannabis product itself.

Violation 9: N.J.A.C. 17:30-16.3(b)(6)- A list of any other inactive or excipient ingredients besides unusable or usable cannabis or cannabis concentrate used to manufacture a cannabis product or contained within the package; for non-TCS food items, this includes a list of ingredients in descending order of predominance by weight or volume, as applicable, and a nutritional label;

Failure to Restrict Access:

Violation 10: N.J.A.C. 17:30-8.1(a)- Every owner, principal, management services contractor, employee, or volunteer of a cannabis business license holder or a testing laboratory that accesses the premises of a cannabis business or handles cannabis on behalf of a license holder or testing laboratory and every cannabis handler pursuant to N.J.S.A. 24:6I–44.a shall be required to register with the Commission and be issued a Cannabis Business Identification Card.

Violation 11: N.J.A.C. 17:30-9.10(a)- (a) Each cannabis business shall provide effective controls and procedures to guard against unauthorized access to the cannabis business premises or the cannabis business's electronic systems, theft, and diversion of cannabis. Such controls may include, but are not limited to, systems to protect against electronic records tampering.

Exceeding Allowable THC Levels:

Violation 12: N.J.S.A. 24:6I-35a.(8)(g)(i)- Health and safety regulations and standards for the cultivation of cannabis, and the manufacture and sale of cannabis items, including, but not limited to, requirements that:

…

(g)(i) Set appropriate dosage, potency, and serving size limits for cannabis items, provided that a standardized serving of a cannabis product shall be no more than 10 milligrams of active THC and no individual edible cannabis product for sale shall contain more than 100 milligrams of active THC;

Violation 13: N.J.A.C. 17:30-11.5(d)(2)- A cannabis manufacturer shall manufacture cannabis products such that each package of finished cannabis product shall, for ingestible products, contain no more than 100mg of active THC.

Violation 14: N.J.A.C. 17:30-11.13(b)(2) - A cannabis manufacturer shall maintain a manufacturing record for each cannabis product; the record shall contain the following information:

…

2. Verification that the ingredients comply with the master formulation record;

On May 11, 2026, an Investigator in the Office of Compliance and Investigations received a complaint from a customer regarding a recent purchase from Brute's Roots, Egg Harbor Township. The customer advised that the labels on the Mafia Melts Blue Razz package included a racial slur within the "Directions of Use" section. During the investigation, it was discovered that the products containing non-compliant labels were Mafia Melts Blue Razz and Peaches and Cream. Brute's Roots stated that the product labels had been modified through Canva.com by a former employee who had been terminated for cause. This former employee accessed the company's label management system using credentials that had not yet been fully deactivated. The affected products had been distributed to other Class 5 retailers. Brute's Roots advised that each wholesale partner was notified and arrangements would be made to deliver replacement labels for the affected products. Further investigation revealed that the product labels did not include the requirement METRC tags, a nutritional label, and that the Mafia Melts Blue Razz flavor contained 104.50 mg of THC in the total package.

Within 20 business days of the receipt of the Notice of Violation, Brute's Roots shall (1) Correct the violation; (2) Notify the Commission, in writing, with a postmark date that is within 20 business days of the date of receipt of the Notice of Violation, of any corrective actions taken to correct the violations, and the date of implementation of such corrective actions.

This Notice of Violation satisfies the NJ-CRC's responsibility to provide five-day notice before any enforcement action shall be taken, as required by N.J.A.C. 17:30-20.5. Brute's Roots is notified that the above-referenced violations may result in the imposition of civil monetary penalties in accordance with the schedule set forth at N.J.A.C. 17:30- 20.7.

N.J.A.C. 17:30-20.5(a) establishes that: "In response to a violation of any provision of the Act or this chapter, the Commission is authorized to take enforcement action or impose sanctions upon a license holder. Sanctions may include, but are not limited to, civil monetary penalties; suspension, revocation, non-renewal, or denial of a license; referral to State or local law enforcement, pursuant to N.J.A.C. 17:30-20.6, 20.7, and 20.8; or any combination thereof." Corrective action taken by Brute's Roots does not preclude the NJ-CRC from imposing penalties but may be taken into consideration when considering the penalty to be imposed for each violation. N.J.A.C. 17:30- 20.6(f)(4).

Brute's Roots has acted in violation of the statutes and adult use regulations by failing to utilize authorized packaging and labeling on products, allowing unauthorized individuals to access business systems, and exceeding allowable THC limits on products.

The NJ-CRC hereby orders Brute's Roots to immediately conform its operations with the statutes, adult use regulations and its Standard Operating Procedures. The NJ-CRC reserves the right to impose sanctions for these violations.

The NJ-CRC appreciates your expeditious cooperation in this matter. Any questions regarding this correspondence can be sent via e-mail to your assigned Field Monitor.

Sincerely,

Marie-Alaina J. Murdza

Marie-Alaina Murdza, Assistant Director
Office of Compliance and Investigations
New Jersey Cannabis Regulatory Commission

Cc: Harris Laufer, Chair, NJ-CRC
Christopher Riggs, Executive Director, NJ-CRC
Dave Tuason, Chief Counsel, NJ-CRC
Pamela Reimers, Investigator, NJ-CRC
Kevin Healey, Chief, NJ-CRC