State of New Jersey
CANNABIS REGULATORY COMMISSION
P.O. BOX 216
TRENTON, N.J. 08625-0216

PHILLIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

DIANNA HOUENOU, *Chair*
KRISTA NASH, *Vice Chair*
AMELIA MAPP, *Commissioner*
CHRIS RIGGS, *Acting Executive Director*

October 2, 2025

VIA CERTIFIED AND ELECTRONIC MAIL *to:* [redacted]
CannaBoyTreehouse, LLC
[redacted]

Re: NOTICE OF VIOLATION –**CANNABOY TREEHOUSE, LLC; INV 128-25**

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 CannaBoy Treehouse, LLC ("CannaBoy"). An investigation which commenced on August 14, 2025, and remains ongoing as of the date of this Notice revealed that CannaBoy provided samples of cannabis items to consumers at no charge, and therefore, committed the following violations:

1. **Violation 1: N.J.A.C. 17:30-14.2**–

(a) A cannabis retailer shall be authorized to:

1. Purchase or acquire usable cannabis from cannabis cultivators, cannabis manufacturers, cannabis wholesalers, or cannabis retailers;
2. Purchase or otherwise obtain cannabis products and related supplies from cannabis manufacturers, cannabis wholesalers, or cannabis retailers;
3. Purchase or acquire paraphernalia and related supplies;
4. Possess, display, transport, transfer, distribute, supply, sell, and furnish usable cannabis, cannabis products, paraphernalia, and related supplies to a consumer, to other cannabis retailers, or to delivery services, based on purchase orders from consumers. . .

. . .

(e) A cannabis retailer shall only sell cannabis items directly to a consumer.

2. **Violation 1: N.J.A.C. 17:30-2.1(b)**–

(b) It is not unlawful, pursuant to N.J.S.A. 2C:35–10.a for:

1. A consumer to possess, display, purchase, transport, or transfer without remuneration for non-promotional, non-business purposes, where the cannabis item is obtained directly from a licensed cannabis retailer:

i. Up to one ounce of usable cannabis; or

ii. Up to the equivalent of one ounce of usable cannabis as a cannabis product in solid, liquid, or concentrate form;

3. Violation 1: N.J.S.A. 2C:35-10.a–

Notwithstanding any other provision of law, the following acts are not unlawful and shall not be an offense or a basis for seizure or forfeiture of assets under N.J.S.2C:64-1 et seq. or other applicable law for persons 21 years of age or older, provided the acts are consistent with the relevant definitions set forth in section 3 of P.L.2021, c.16 (C.24:6I-33), and when an act involves a cannabis item, it was first obtained directly from a licensed cannabis retailer or delivered by a licensed cannabis delivery service making delivery of a purchase order fulfilled by that licensed cannabis retailer for off-premises delivery, evidenced by it being in its original packaging or by a sales slip, invoice, receipt, or other statement or memorandum: . . .

b. Transferring without remuneration: one ounce (28.35 grams) or less of usable cannabis; the equivalent of one ounce (28.35 grams) or less of usable cannabis as a cannabis product in solid, liquid, or concentrate form, based upon the equivalency calculation for different product forms set by the commission pursuant to subsection a. of this section; or five grams (0.176 ounce) or less of cannabis resin to a person who is of legal age for purchasing cannabis items, provided that such transfer is for non-promotional, non-business purposes. Transferring at any one time any amount of any cannabis items described herein in an amount greater than as permitted pursuant to this subsection shall be considered a violation of the "Comprehensive Drug Reform Act of 1987," P.L.1987, c.106 (N.J.S.2C:35-1 et al.), and subject the person to prosecution as if the person distributed marijuana or hashish in violation of that act. Transferring to a person who is not of legal age that was done by a cannabis establishment, distributor, or delivery service licensed pursuant to P.L.2021, c.16 (C.24:6I-31 et al.), or an employee or agent thereof, or by any other person, is subject to a civil penalty or other legal consequences as set forth in subsection b. of section 64 of P.L.2021, c.16 (C.2C:35-10d) or section 6 of P.L.2021, c.25 (C.2A:170-51.11), as applicable, and a fine as set forth in section 3 of P.L.1999, c.90 (C.2C:33-13.1);

During the course of the investigation, a compliance officer from the Office of Compliance and Investigations reviewed package adjustments that were displayed in METRC from January 1, 2025 through August 14, 2025 and conducted a package scan of the current inventory. This review revealed that multiple packages and METRC tags were missing from the storage area. After comparing the data within the point-of-sale system and METRC, the following METRC package tags were identified as “sample packages” and were not located: 1) 1A411030000601A000007406: Garlic Cookies (8 individual items), received from ABCO Garden State on April 9, 2025; 2) 1A411030000601A000005410: Blue Runtz (8 individual items), received from ABCO Garden State on April 9, 2025; 3) 1A41103000601000009784: Blue Runtz (8 individual items), received from ABCO Garden State on May 23, 2025; 4) 1A41103000202900000 2168: Miracle Mints (10 individual items), received from Brute’s Roots on June 25, 2025; 5) 1A41103000202900000 2169: First Class Gas (10 individual items), received from Brute’s Roots on June 25, 2025; 6) 1A41103000202900000 2170: Tiramisu (10 individual items), received from Brute’s Roots on June 25, 2025. The investigation revealed that there were no sales receipts or transactions associated with the above-mentioned items. Linsey Lofton, Manager of CannaBoy, confirmed to the compliance officer that the missing packages were provided to customers as samples and that there were no receipts or tracking information for the packages because they were given to customers at no charge. While Mr. Lofton could not recall how many samples were provided to customers at no charge, at a minimum, the above listed fifty-four (54) cannabis items were given to customers at no charge.

Within 20 business days of the receipt of the Notice of Violation, CannaBoy 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. CannaBoy 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 CannaBoy 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).

CannaBoy has acted in violation of the Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act, N.J.S.A. 24:6I-31 et seq., and the adult use regulations by allowing cannabis items to be available for sampling by customers at no charge.

The NJ-CRC hereby orders CannaBoy to immediately conform its operations and sales and distribution procedures with the statute and adult use regulations. 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,

Paul Thomas Urbish, Esq. Director
Office of Compliance and Investigations
New Jersey Cannabis Regulatory Commission

Cc: Dianna Houenou, Chairwoman, NJ-CRC
Christopher Riggs, Executive Director, NJ-CRC
Dave Tuason, Chief Counsel, NJ-CRC
Joseph Sparano, Compliance Officer, NJ-CRC
Kevin Healey, Chief, NJ-CRC