

From: [Jenkins, Melissa](#)
To: [Devra Karlebach](#)
Cc: [Vierbuchen, John](#); [Baracia, James M](#); [Brown, Jeff](#)
Subject: Patient Incident 3/31/2020
Date: Thursday, May 7, 2020 2:54:57 PM

Devra,

Regarding the events that took place concerning Patient [REDACTED] and Patient [REDACTED] at the RISE GTI Dispensary on March 31, 2020 the following was observed **via the State's Registry, GTI IMS, and GTI provided video, all documenting errors made by GTI Staff.**

[REDACTED] entered your dispensary as a new patient. Your staff created a patient profile in Leaf Logix under [REDACTED] with his intake forms uploaded. A transaction was made in your IMS under this profile for ¼ ounce at 12:34pm **by** Patient Care Specialist [REDACTED]. An entry into the MMP Registry was made under [REDACTED] for ¼ ounce at 1:34pm by [REDACTED]. Then a second entry made into the MMP Registry for 1/8 ounce **for** [REDACTED] at 11:39pm **also by** [REDACTED].

[REDACTED] entered your dispensary as a new patient. Your staff created a patient profile in Leaf Logix under [REDACTED] with no intake forms uploaded. A transaction was made in your IMS under this profile for 3/8 ounce at 1:36pm with Patient Care Specialist [REDACTED]. An entry into the MMP Registry was made under [REDACTED] for 3/8 ounce at 1:38pm **also by** [REDACTED].

Once these errors were brought to your attention your staff then adjusted the following in Leaf Logix:

- Moved the transaction from patient profile [REDACTED] to patient profile [REDACTED]
- Deleted patient profile [REDACTED]
- Created patient profile for [REDACTED]
- Corrected spelling for patient profile [REDACTED]
- Moved the transaction that was completed at 1:36pm from patient profile [REDACTED] to patient profile [REDACTED]

Furthermore, **observed via video**, [REDACTED] failed to check [REDACTED] Photo ID, **failed to** check [REDACTED] MMP Patient Card, **and failed to** verify purchased products against the receipt and include a safety insert with the purchase. This is inconsistent with RISE's "DISR-NJ-POP-001 Retail Operations" and "DISR-NJ-SOP-003 Dispensing". Your staff also failed to properly create patient profiles which is inconsistent with RISE's "DISR-NJ-SOP-001 New Patient Check-In".

This clearly constitutes violations of:

N.J.A.C. 8:64-9.1(a)2, and 8:64-9.1(a)3

1. 8:64-9.1 Alternative treatment centers policies, procedures and records

(a) Each alternative treatment center shall develop, implement and maintain on the premises an operations manual that addresses, at a minimum, the following:

2. Procedures for safely growing and dispensing medicinal marijuana;

2. **8:64-9.1 Alternative treatment centers policies, procedures and records**

(a) Each alternative treatment center shall develop, implement and maintain on the premises an operations manual that addresses, at a minimum, the following:

3. Procedures to ensure accurate recordkeeping, including protocols to ensure that quantities cultivated do not suggest redistribution;

RISE GTI shall provide a corrective action plan within 7 calendar days for the above violations, describing preventative measures to avoid the occurrences of similar incidents in the future. That document should be placed on HF-ATC letterhead and addressed to Mr. Jeffrey Brown, Assistant Commissioner, Division of Medicinal Marijuana, NJ Department of Health. Also RISE GTI will provide the information of the employees involved in the patient intake error and sales error as well as copies of documentation regarding retraining and discipline.

Thank You,

Melissa Jenkins
Investigator, Medicinal Marijuana
NJ Department of Health

[REDACTED]
[REDACTED]
[REDACTED]

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