State of New Jersey
CANNABIS REGULATORY COMMISSION
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June 30, 2026

VIA CERTIFIED AND ELECTRONIC MAIL *to:*
[redacted]
Green Analytics East LLC
[redacted]

Re:NOTICE OF VIOLATION –**Green Analytics East LLC;** INV 64 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 Green Analytics East LLC ("Green Analytics East"). An investigation which commenced on February 26, 2026, and remains ongoing as of the date of this Notice, revealed Green Analytics East committed the following violations:

1. **Violation 1: N.J.A.C. 17:30-9.10(b)(9)(i)**- At a minimum, each cannabis business shall:
   9. Equip interior and exterior premises with electronic monitoring, video cameras, and panic buttons.
      i. A video surveillance system shall be installed and operated at the cannabis business premises to clearly monitor all critical control activities of the cannabis business and shall be in working order and operating at all times. The cannabis business shall provide access for remote viewing by the Commission. This system shall be approved by the Commission prior to license issuance.

2. **Violation 2**: **N.J.A.C. 17:30-9.10(b)(9)(ii)-** At a minimum, each cannabis business shall:
   9. Equip interior and exterior premises with electronic monitoring, video cameras, and panic buttons.
   ii. The original tapes or digital pictures produced by this system shall be stored in a safe place with a 30-day archive

3. **Violation 3: N.J.A.C. 17:30-19.3(b)(4)**- A testing laboratory employee shall collect a representative initial sample and a representative retention sample from each batch of usable cannabis from a cannabis business that cultivates and from each lot of cannabis products from a cannabis business that manufactures according to a statistically valid sampling method.

    4. A representative initial sample of usable cannabis shall be .5 percent of a batch or lot, with the following increment sample amounts:

        i. Less than or equal to 10 pounds of usable cannabis, five increment samples;
        ii. 10.1-20 pounds of usable cannabis, 10 increment samples;
        iii. 20.1-30 pounds of usable cannabis, 15 increment samples;
        iv. 30.1-40 pounds of usable cannabis, 20 increment samples;
        v. 40.1-50 pounds of usable cannabis, 25 increment samples; and
        vi. 50.1-100 pounds of usable cannabis, 30 increment samples.

4. **Violation 4: N.J.A.C. 17:30-19.3(b)(5)-** A testing laboratory employee shall collect a representative initial sample and a representative retention sample from each batch of usable cannabis from a cannabis business that cultivates and from each lot of cannabis products from a cannabis business that manufactures according to a statistically valid sampling method.

    5. A representative initial sample of non-homogenizable cannabis product shall be:

        i. 50 or less total units, two increment units;
        ii. 51-150 total units, three increment units;
        iii. 151-500 total units, five increment units;
        iv. 501-1,200 total units, eight increment units;
        v. 1,201-3,200 total units, 16 increment units;
        vi. 3,201-10,000 total units, 40 increment units; and
        vii. 10,001-35,000 total units, 125 increment units.

5. **Violation 5: N.J.A.C. 17:30-19.4(a)-** The testing laboratory shall test the initial samples of cannabis and cannabis product collected in accordance with N.J.A.C. 17:30-19.3 to confirm whether the samples meet the specifications of this section according to the standard operating procedures of the laboratory that have been approved by the accreditation body pursuant to N.J.A.C. 17:30-18.5(e).

6. **Violation 6: N.J.S.A. 24:6I-19(e)**- Until such time as the commission establishes the standards required by this section, a licensed laboratory shall utilize the testing standards established by another state with a medical cannabis program, which state shall be designated by the commission.

    The New Jersey Cannabis Regulatory Commission designated the testing standards set by the State of Maryland, located in Title 10, Subtitle 62 of the Code of Maryland Regulations (COMAR), as reflected in Appendix A of Resolution 2021-9, to serve as the Commission's Interim Testing Standards adopted pursuant to N.J.S.A. 24:61-19(e). Additionally, pursuant to N.J.A.C. 17:30-19.4(a)(1), all testing laboratories shall analyze samples according to the Cannabis Regulatory Commission's Testing Guidance. Resolution 2025-05-01-05 rescinded the Commission's testing guidance and required all Testing laboratories to follow the interim testing guidance, namely the Maryland Technical Authority for Cannabis Testing, Revision 3.0, December 15, 2020.

7. **Violation 7: N.J.A.C. 17:30-18.5(e)(2)**- A licensed testing laboratory shall maintain third-party accreditation from an accreditation body that requires conformance to the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) general requirements for the competence of testing and calibration laboratories (ISO/IEC 17025 standards).

    2. A licensed testing laboratory shall adopt a standard operating procedure to test cannabis and cannabis products that is approved by such accreditation body.

During an audit of Green Analytics METRC history, NJ-CRC staff determined:

- On March 13, 2026, NJ-CRC staff discovered that the Commission could no longer access archived footage from Green Analytics East's video surveillance system. Later that same day, Green Analytics East informed staff that it had unilaterally restricted the Commission's login credentials to "live view".

- Green Analytics East's Standard Operating Procedure ("SOP") directs staff to collect only one third of the required 0.5 percent of a batch or lot for initial sampling. This deviates from the adult use regulations, which mandate sampling of the full 0.5 percent. By collecting materially less than the required sample amount, the actual sampling amounts are no longer statistically significant, which undermines the validity of all testing performed by Green Analytics East.

- The sampling procedure for non-homogenizable cannabis products in SOP-065-NJ does not conform to adult use regulations. Additionally, Green Analytics East does not follow its own SOP for sampling non-homogenizable products or for testing edible cannabis products.

- The Maryland Testing Standards adopted by the Commission require that "testing results for all time points shall be generated within 14 calendar days of the date of the time point to be measured." Green Analytics East failed to report stability testing results within this required timeframe. Delayed reporting poses significant consumer safety risks, as microbial failures in stability testing cannot be remediated and products that fail are not immediately removed from shelves.

- The Maryland Testing Standards require Total Microbial Count ("TAMC") to be performed with an approved Association of Official Analytical Chemists, Food and Drug Administration, or United States Pharmacopeia validated planting method, or another method approved by the Maryland Medical Cannabis Commission ("MMCC"). Green Analytics East uses qPCR for TAMC, which is not a validated plating method. NJ-CRC's investigation determined that, contrary to Green Analytics East's assertions, this method was not previously approved by MMCC, and no AOAC Performance Tested Method exists for the qPCR method used.

- The Maryland Testing Standards require laboratories to select 10 unique edible cannabis products in final form for cannabinoid content analysis. NJ-CRC's investigation determined that Green Analytics East repeatedly tested only two edible products ("gummies") for uniformity, in violation of adult use regulations, its own SOP, and ISO 17025 Clause 7. Green Analytics East also failed to maintain required sample traceability, further violating its SOP and ISO 17025 Clause 7.5.

- Sample data revealed that four cannabis flower samples failed Total Aerobic Count ("TAC") at the six-month stability testing interval. NJ-CRC determined that Green Analytics East did not perform planting procedures required to rule out false positives or false negatives that may show up in PCR by dead DNA which may be present in the samples, in violation of the Maryland Testing Standards.

- Sample data revealed that four cannabis flower samples failed TAC at the six-month stability testing interval. NJ-CRC determined that Green Analytics East did not run instrument controls for two of these samples that were outlined in their methods SOP-702-GA and SOP-703-GA. Despite the missing controls, the TAC data was still reported. Green Analytics East failed to follow their own SOPs, further violating ISO 17025 Clause 7.5 for failure to maintain sample traceability and following its own SOPs.

Within 20 business days of the receipt of the Notice of Violation, Green Analytics East 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. Green Analytics East 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 Green Analytics East 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).

Green Analytics East has acted in violation of the Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act ("CREAMM Act"), N.J.S.A. 24:6I-31 et seq., the adult use regulations, and its Standard Operating Procedures by failing to conform with the Maryland Testing Standards adopted by the Commission; restricting the Commission's required remote access to its video-surveillance system; collecting insufficient and non-representative initial samples; failing to report stability-testing results within the required 14-day period; utilizing non-validated methods for microbial testing and failing to perform required plating procedures; failing to properly test edible cannabis products in final form; and failing to maintain required sample traceability.

The NJ-CRC hereby orders Green Analytics East to immediately conform its operations with the adult-use regulations and the Maryland Testing Standards. 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,



Dave Tuason, Esq. Director
Office of Compliance and Investigations
New Jersey Cannabis Regulatory Commission

Cc: Harris Laufer, Chairperson, NJ-CRC
Christopher Riggs, Executive Director, NJ-CRC
Arundhati Mohankumar, Chief Counsel, NJ-CRC
Maria Rosero, Laboratory Evaluator Manager, NJ-CRC
Pamela Reimers, Investigator, NJ-CRC
Kevin Healey, Chief, NJ-CRC