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

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Lt. Governor

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SEAN KENNEDY, *Commissioner*
CHRIS RIGGS, *Acting Executive Director*

August 13, 2026

[redacted]
Green Analytics East LLC
[redacted]

Re: **NOTICE OF ENFORCEMENT ACTION -** INITIAL AGENCY DECISION REGARDING IMPOSITION OF SANCTIONS AGAINST GREEN ANALYTICS EAST LLC

Dear [redacted]:

The New Jersey Cannabis Regulatory Commission ("NJ-CRC" or "Commission") has imposed a civil monetary penalty of $65,000.00 for the reasons articulated below.

NJ-CRC's Issuance of Notice of Violation

Pursuant to N.J.A.C. 17:30-20.4(a), during an onsite assessment, a review of financial records, or other Commission review of the license holder and its operations, if the Commission identifies a violation of the Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act, P.L.2021, c.16, N.J.S.A. 24:6I-31 et seq., (the "Act") or the implementing Personal-Use Cannabis Rules (the "Personal-Use Regulations"), the Commission shall provide notice of the violation, including an official written report of the findings and the nature of the violation, to the cannabis business or testing laboratory within seven business days following the onsite assessment or other identification of the violation.

Pursuant to N.J. Admin. Code § 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.

Pursuant to N.J. Admin. Code § 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

Pursuant to N.J. Admin. Code § 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.

Pursuant to N.J. Admin. Code § 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.

Pursuant to N.J. Admin. Code § 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).

Pursuant to N.J. Stat. Ann. § 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.

Pursuant to N.J. Admin. Code § 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.

On June 30, 2026, a Notice of Violation was issued to Green Analytics East LLC ("Green Analytics") for 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.

Pursuant to N.J.A.C. 17:30-20.4(b), unless otherwise specified by the Commission, within 20 business days of receipt of the notice of violation, the cannabis business or testing laboratory shall correct the violation(s) and notify the Commission, in writing, of any corrective actions taken to correct the violations, and the date of implementation of such corrective actions. Green Analytics responded to the Notice of Violation and provided a corrective action plan within 20 days of receipt of the Notice of Violation.

NJ-CRC's Review of Imposition of Sanctions

Regardless of whether a license holder provides a corrective action plan, pursuant to N.J.A.C. 17:30-20.5(a), in response to a violation of any provision of the Act or the Personal-Use

Regulations, 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.

Pursuant to N.J.A.C. 17:30-20.6(b), a monetary penalty imposed by the Commission on a license holder pursuant to this subchapter may not exceed $500,000 per major violation or $50,000 per any other license violation. Pursuant to N.J.A.C. 17:30-20.6(c), a violation by each entity or person per day shall constitute a separate incident for the purposes of calculating the number of violations.

Pursuant to N.J.A.C. 17:30-20.6(d), the Commission may impose greater penalties for successive violations up to the maximum amounts.

Pursuant to N.J.A.C. 17:30-20.6(f), the Commission may, in the Commission's sole discretion, consider additional factors in determining the penalty for each violation. Such factors may include, but are not limited to:

1. Any prior violations that the license holder has admitted to or was found to have engaged in;
2. Good faith measures by the license holder to self-report or prevent the violation;
3. The license holder's record of compliance with the laws and rules pertaining to personal use cannabis;
4. Corrective action(s) taken by the license holder related to the current violation or prior violations;
5. Willfulness and deliberateness of the violation;
6. Likelihood of reoccurrence of the violation; and
7. Violations involving damage or danger to the life, health, welfare, safety, or property of any person.

After completing a thorough review of Green Analytics' violations for 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 Commission has determined to impose a civil monetary penalty of $65,000.00. The Commission's assessment of the civil monetary penalty is detailed below:

1. Violation 1: N.J.A.C. 17:30-9.10(b)(9)(i) - $5,000.00
2. Violation 2: N.J.A.C. 17:30-9.10(b)(9)(ii) - $5,000.00
3. Violation 3: N.J.A.C. 17:30-19.3(b)(4) - $15,000.00
4. Violation 4: N.J.A.C. 17:30-19.3(b)(5) - $15,000.00
5. Violation 5: N.J.A.C. 17:30-19.4(a) - $5,000.00
6. Violation 4: N.J.S.A. 24:61-19(e) - $15,000.00
7. Violation 5: N.J.A.C. 17:30-18.5(e)(2) - $5,000.00

In determining the penalty, the Commission considered where applicable, the license holder's history of violations, penalties previously imposed on businesses for similar violations and the particular facts and circumstances of the violation. The Commission finds the imposed penalty to be fair, reasonable, and consistent with the regulations at N.J.A.C. 17:30.

Next Steps

Fines must be paid online by logging into the Commission's licensing portal at https://nj-crc-public.nls.egov.com/login. If you feel you cannot pay the fine within 30 days of the date of this notice, you are encouraged to contact the Commission to establish a payment plan.

Please inform your assigned investigator when payment has been made.

If you wish to contest the imposition of this penalty, you may request an adjudicatory hearing pursuant to the Administrative Procedure Act, N.J.S.A. 52:14B-1 et seq., and 52:14F-1 et seq., to contest the Commission's imposition of a civil monetary penalty for any license violation within 14 days of receipt of this initial decision. If you wish to exercise your right to a hearing, such a request must be made in writing and sent to:

Arundhati Mohankumar, Chief Counsel
New Jersey Cannabis Regulatory Commission
PO Box 216
Trenton, NJ 08625-0216
Arundhati.Mohankumar@crc.nj.gov

Should you have any questions regarding this correspondence, please submit your inquiry to the NJ-CRC Licensing inbox at crc.licensing@crc.nj.gov.

Sincerely,



Harris Laufer
Chairperson
New Jersey Cannabis Regulatory Commission