State of New Jersey
CANNABIS REGULATORY COMMISSION
P.O. BOX 216
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CHRIS RIGGS, *Acting Executive Director*

September 12, 2025

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

Re: NOTICE OF VIOLATION – Hashery LLC; INV 89-2025

Dear [redacted],

This letter is a Notice of Violation, issued by the New Jersey Cannabis Regulatory Commission ("NJ-CRC") in accordance with N.J.A.C. 17:30-7.10(21) to Hashery LLC. An investigation which commenced on April 28, 2025 and is currently ongoing, revealed that Hashery LLC hosted an event in their parking lot that included on-site cannabis consumption. Upon review of surveillance footage by Investigator Jessica Cristadoro of the premises, the following observations were made:

- An unapproved recreational vehicle ("RV") was present on the premises visibly displaying the business's license name.
- A large tent was set up in the parking lot which housed a self-described "educational dab bar".
- There was no visible age verification taking place, or an age identification check present at the entrance of the tent.
- Cannabis consumption was observed taking place openly in the parking lot area of the premises.

Hashery LLC was found to have committed the following violation:

1. **Violation 1:** N.J.A.C. 17:30-14.2 Cannabis retailer authorized conduct; prohibition

(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 2:** N.J. Stat. Ann. § 2C:35-10a

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:170-51.13), as applicable, and a fine as set forth in section 3 of P.L.1999, c. 90 (C.2C:33-13.1).

3. **Violation 3:** N.J.A.C. 17:30-9.15(e) A cannabis business shall ensure that a delivery vehicle bears no markings that would either identify or indicate that the vehicle is used to transport cannabis.

4. **Violation 4:** N.J.A.C. 17:30-14.3 Cannabis retailer to a consumer (a) - Before allowing entrance to a cannabis retailer, and additionally prior to selling or serving cannabis items to a consumer, for each transaction, cannabis retailer personnel shall examine any one of the following pieces of photographic identification and shall confirm the consumer is of legal age to purchase cannabis:

1. The person's United States passport; other country's passport; or proper government-issued documentation for international travel, provided it is lawful to use as identification in the United States;

2. The person's motor vehicle driver's license, whether issued by New Jersey or by any other state, territory, or possession of the United States, or the District of Columbia, provided the license displays a picture of the person;

3. A New Jersey identification card issued by the New Jersey Motor Vehicle Commission; or

4. Any other identification card issued by a state, territory, or possession of the United States, the District of Columbia, or the United States that bears a picture of the person, the name of the person, the person's date of birth, and a physical description of the person.

5. **Violation 5:** N.J.A.C. 17:30-14.3(c)- Cannabis retailer personnel shall log that the examination of photographic identification and confirmation of legal age pursuant to (a) above occurred in a record, and the

cannabis retailer shall maintain such record and it shall be available for inspection by the Commission.

Within 20 business days of the receipt of the Notice of Violation, Hashery LLC 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. Hashery LLC was 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 Hashery LLC 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).

Hashery LLC has acted in violation of the adult use regulations and the purpose and intent of the Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act by having an unapproved RV present and visibly displaying the business's license name; having a large tent set up in the parking lot which housed a self-described "educational dab bar"; having no visible age verification or ID check occurring at the entrance of the tent; and allowing cannabis consumption to take place openly in the parking lot area of the premises.

The NJ-CRC hereby orders Hashery LLC to immediately conform its operations and sales procedures with the adult use regulations. The NJ-CRC reserves the right to impose sanctions for these regulatory 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
Kevin Healey, Chief, NJ-CRC

Jessica Cristadoro, Field Monitor, NJ-CRC