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*

September 4, 2025

VIA CERTIFIED AND ELECTRONIC MAIL *to:* [redacted]
The Honorable Plant
[redacted]

Re: NOTICE OF VIOLATION –**THE HONORABLE PLANT;** INV 117-25

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 The Honorable Plant ("The Honorable Plant"). An investigation which commenced on June 16, 2025, and remains ongoing as of the date of this Notice revealed The Honorable Plant committed the following violations:

Violation 1: N.J.A.C. 17:30-9.2 –

(a) Cannabis business license holders shall submit an application for an amended license, along with the applicable fee, if any, pursuant to N.J.A.C. 17:30-7.17, for the following material changes, a change:

1. In ownership, which shall include:

i. Addition or removal of owners or passive investors;

ii. Change in license holder entity structure, including any related mergers, acquisitions, or creation of new related entities;

iii. Change in ownership structure or ownership interest that results in a change of owner, pursuant to N.J.A.C. 17:30-9.3; and

iv. Any other changes to the ownership and financial information provided to the Commission pursuant to N.J.A.C. 17:30-7.10 and 7.13;

. . . .

(b) Failure to seek approval for such material changes pursuant to (a) above may result in sanctions upon the license holder pursuant to N.J.A.C. 17:30-20, including civil penalties, or suspension or revocation of any license issued to the license holder.

The Honorable Plant submitted a request for a change of ownership that was assigned to an investigator in the Office of Compliance and Investigations on June 16, 2025. During the course of the investigation, it was found that minority owner Bernadette Dunphy had been removed as an owner with neither notification to NJ-CRC nor approval by the Board in violation of the above regulation.

Within 20 business days of the receipt of the Notice of Violation, The Honorable Plant 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. The Honorable Plant 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 The Honorable Plant 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).

The Honorable Plant 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 effectuating an ownership change prior to Board approval.

The NJ-CRC hereby orders The Honorable Plant to immediately conform its operations and ownership structure with the initial application on file with the Commission, with the adult use regulations, and its Standard Operating Procedures. 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
Shawn Keyes, Investigator, NJ-CRC
James Baracia, Chief, NJ-CRC
Monica McGill, Field Monitor, NJ-CRC