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

February 10, 2026

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

Re: NOTICE OF VIOLATION – **Mollitiam NJ LLC; INV 13 26**

Dear [redacted]:

This letter is a Notice of Violation ("Notice"), issued by the New Jersey Cannabis Regulatory Commission ("NJ-CRC" or "Commission") in accordance with N.J.A.C. 17:30-20.4 to Mollitiam NJ LLC ("Mollitiam"). An investigation which commenced on February 3, 2026, and remains ongoing as of the date of this Notice, revealed Mollitiam committed the following violations:

1. **Violation 1: N.J.S.A 24:6I-36a.-** Each application for an annual license to operate a cannabis establishment, distributor, or delivery service, or conditional license for a proposed cannabis establishment, distributor, or delivery service, shall be submitted to the commission. A separate license or conditional license shall be required for each location at which a cannabis establishment seeks to operate, or for the location of each premises from which a cannabis distributor or delivery service seeks to operate.

2. **Violation 2: N.J.S.A. 24:6I-46b.(1)(a)-** A cannabis license holder shall be authorized to hold a Class 1 Cannabis Cultivator license, a Class 2 Cannabis Manufacturer license, a Class 5 Cannabis Retailer license, and a Class 6 Cannabis Delivery license concurrently, provided that no license holder shall be authorized to concurrently hold more than one license of each class, except for an alternative treatment center that was deemed, during the 24-month period, to have an additional Class 5 Cannabis Retailer license for each satellite dispensary that was authorized and established by the alternative treatment center pursuant to subparagraph (d) of paragraph (2) of subsection a. of section 7 of P.L.2009, c.307 (C.24:6I-7).

3. **Violation 3: N.J.A.C. 17:30-6.8(e)(1):** A license holder and its owners and principals may concurrently hold one cannabis cultivator, one cannabis manufacturer, one cannabis retailer, and one cannabis delivery service license.

4. **Violation 4: N.J.A.C. 17:30-3.6(a)**- The Commission has the authority to require all ATCs and cannabis businesses to use the inventory tracking system designated by the Commission to track the cultivation, manufacturing, distribution, storage, transportation, and retail sale of medical cannabis and cannabis items pursuant to N.J.S.A. 24:6I-22.

5. **Violation 5: N.J.A.C. 17:30-9.13(a)** Each cannabis business, at a minimum, shall: Utilize the inventory tracking system designated by the Commission pursuant to N.J.A.C. 17:30-3.12. i. Cannabis businesses shall utilize any plant tags, product identification tags, or stamps designated by the Commission pursuant to N.J.A.C. 17:30-3.6 and 13.4.

6. **Violation 6: N.J.A.C. 17:30-9.13(a)(4)-** Each cannabis business, at a minimum, shall: Update product inventories on at least a daily basis.

7. **Violation 7: N.J.A.C. 17:30-9.12(b)**- Each cannabis business shall securely store finished usable cannabis and cannabis products that are ready for sale in a locked area, which may include a locked room, cage, or safe, with adequate security and limited access.

   1. For purposes of this subsection, "adequate security," at a minimum, shall be assessed, established, and maintained based on:
      i. The quantity of cannabis items kept on-hand;
      ii. The cannabis business's inventory system for tracking and distributing cannabis items;
      iii. The number of owners, principals, employees, volunteers, management services contractor staff, or vendor-contractors who have or could have access to the cannabis items;
      iv. The geographic location of the cannabis business and its associated environmental characteristics, such as the remoteness of the premises from local populations and the relative level of crime associated with the area;
      v. The scope and sustainability of the security alarm system; and
      vi. The findings of root cause analyses of any breaches of security and/or inventory discrepancies for cannabis items at that location.

8. **Violation 8: N.J.A.C. 17:30-8.1(a)** - Every owner, principal, management services contractor, employee, or volunteer of a cannabis business license holder or a testing laboratory that accesses the premises of a cannabis business or handles cannabis on behalf of a license holder or testing laboratory and every cannabis handler pursuant to N.J.S.A. 24:6I-44.a shall be required to register with the Commission and be issued a Cannabis Business Identification Card.

9. **Violation 9: N.J.S.A. 24:6I-22a.(2)(c)-** A medical cannabis cultivator, medical cannabis manufacturer, medical cannabis dispensary, clinical registrant, or certified medical cannabis handler, or a personal use cannabis cultivator, cannabis manufacturer, cannabis wholesaler, cannabis distributor, cannabis retailer, cannabis delivery service, or certified personal use cannabis handler, shall not purchase, sell, offer for sale, transfer, transport, or deliver any medical cannabis or personal use cannabis item unless a stamp is properly affixed to the container or package for the medical cannabis or personal use cannabis item.

10. **Violation 10: N.J.A.C. 17:30-9.4(l)-** A visitor entering a cannabis business premises must be accompanied by an escort with a Cannabis Business Identification Card at all times, except in the consumer area of a cannabis retailer. 1. A vendor-contractor's staff shall be considered to be a visitor during any time present at a cannabis business premises, except if the person is a management services contractor or other cannabis handler that possesses a Cannabis Business Identification Card, in accordance with N.J.A.C. 17:30–8.1(a).

11. **Violation 11: N.J.A.C. 17:30-9.14(a)- A** license holder shall manage non-hazardous unusable cannabis, cannabis waste, or cannabis items, including returned, recalled, or usable cannabis or cannabis products that have expired, by either: destroying the material through incineration; or rendering the material unrecoverable, unrecognizable, and useless for diversion, and then disposing of the material by either transporting it off-site as compost or solid waste or composting it on-site.

12. **Violation 12: N.J.A.C. 17:30-9.15**- Secure Transport (in its entirety)

13. **Violation 13: N.J.A.C. 17:30-10.1(b)-** A cannabis cultivator shall produce cannabis only at the cannabis business premises authorized in the license, including any indoor or outdoor areas.

14. **Violation 14: N.J.A.C. 17:30-10.3(a)-** Outdoor cultivation may be permitted, where the license holder complies with the Act and this chapter, and where approved by the municipality in which the cannabis business is located.

15. **Violation 15: N.J.A.C. 17:30-10.4-**
    (a) All cannabis cultivators shall be assigned a cultivation production management tier at license issuance and reassigned at renewal, as necessary.
    (b) The cannabis cultivator shall accurately calculate its plant count and mature cannabis plant grow canopy area.
        1. Square footage of a mature cannabis plant grow canopy area is measured horizontally, starting from the outermost point of the furthest plant in a grow canopy area and continuing around the outside of all plants located within the mature cannabis plant grow canopy area.
        2. If a vertically tiered or shelving system is included in the cultivation area, the surface area of each tier or shelf must be included in calculating the grow canopy area.
        3. A mature cannabis plant grow canopy area is the total square feet in which a cannabis cultivator plants and grows cannabis plants, and does not include areas exclusively used for harvesting, drying, curing, packaging, labeling, or storing cannabis.

16. **Violation 16: N.J.A.C. 17:30-9.2(a)5.-** 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: . . . 5. Of modification of capacity, physical plant, premises, or administrative office; or

17. **Violation 17: N.J.A.C. 17:30-10.7(b)-** A cannabis cultivator shall have at least the following storage areas, which must be segregated from each other:

1. Storage for newly received cultivation materials or components and newly received cannabis seeds, cuttings, clones, immature cannabis plants, or usable cannabis;
2. Batches of usable cannabis awaiting release for distribution for personal use, pending written reports confirming they meet specifications;
3. Any usable cannabis suspected, but not yet confirmed to be contaminated, including usable cannabis returned as part of a complaint or recall process;
4. Usable cannabis, components, or materials that have been confirmed to be contaminated, including, but not limited to, usable cannabis that fails testing or is returned as part of a recall, and shall be stored with cannabis waste in a waste disposal room until destroyed and rendered unrecoverable and unrecognizable, in accordance with N.J.A.C. 17:30–9.14.

18. **Violation 18: N.J.A.C. 17:30-11.1(b)-** Access to the enclosed indoor, locked area or facility shall be limited to Cannabis Business Identification Cardholders when acting on behalf of the cannabis manufacturer within the scope of their responsibilities as an owner, principal, employee, volunteer, management services contractor, or staff member of the license holder.

19. **Violation 19: N.J.A.C. 17:30-9.13(a)(5)-** Each cannabis business, at a minimum, shall: Conduct a monthly inventory audit of cultivating cannabis, and stored usable and unusable cannabis.

On Tuesday, February 3, 2026, a routine site inspection was conducted by Compliance Officers assigned to the NJ-CRC Office of Compliance and Investigations at Mollitiam NJ, LLC located at 1355 W. Front St, Plainfield, NJ 07063 where two licenses (C000147 and M000276) were inspected. During that inspection, it was discovered that the business had been conducting an outdoor grow at an unapproved location at 81-83 Brighton Road, Andover, New Jersey, Sussex County. Specifically, the Compliance Officers were advised by Mollitiam that it had previously ceased its grow operations in Plainfield; it had been harvesting at the Andover location and transporting the plants to Plainfield for storage, processing, and packaging only. Because the Andover Township location was never approved by the NJ-CRC, all flower grown at the Andover location has been designated as illegal marijuana. Additionally, Mollitiam's designated cultivation production management tier is based on the canopy area at the Plainfield location, and NJ-CRC was not notified before it ceased its operations and/or modified its capacity. During the inspection, it was discovered that the flower grown at the Andover location was improperly and illegally transported by Mollitiam to its licensed Plainfield location to be processed and wholesaled to licensed manufacturing and retailing partners.

During the inspection of the cultivation facility (C000147) at Plainfield, NJ-CRC Compliance Officers observed forty-nine (49) large watermelon and pumpkin produce boxes filled with flower in the cultivation vault. None of the cannabis had Marijuana Enforcement Tracking Reporting Compliance ("METRC") tags attached. The Compliance Officers observed additional boxes in the vault, finding additional flower, but no METRC tags were visible. NJ-CRC Compliance Officers observed a small area in the cultivation vault with untagged expired flower. The NJ-CRC Compliance Officers also observed additional bags of untagged flower in the flower rooms and in three (3) freezers. Additionally, during an inspection of the manufacturing facility (M000276) at Plainfield, NJ-CRC Compliance Officers observed more unsecured product was left in the back of the room without any visible METRC tags. Additionally, during this inspection, the landlord of the cannabis business was allowed entry into the manufacturing premises without an escort and despite not possessing a cannabis business identification card. Finally,

while leaving the facility the Compliance Officers requested the security guard to present his cannabis identification badge, but the security guard did not possess one.

Within 20 business days of the receipt of the Notice of Violation, Mollitiam 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. Mollitiam 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 Mollitiam 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).

Mollitiam has acted in violation of the adult use regulations and its Standard Operating Procedures by conducting an illegal outdoor grow at an unapproved location, storing cannabis in an unsecure area, failing to follow employee badging processes, failing to appropriately restrict access to premises, failing to notify the Commission regarding modifications to the license, failing to securely transport cannabis items, failing to appropriately store and dispose of expired cannabis items, failing to use the inventory tracking system designated by the Commission and failing to update its cannabis item inventories on a regular basis.

The NJ-CRC hereby orders Mollitiam to immediately conform its operations with the adult use regulations. The NJ-CRC reserves the right to impose sanctions, including suspension or revocation of a license, for these violations. Furthermore, additional Notices of Violations may be issued to Mollitiam based on the results of the ongoing investigation.

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