



State of New Jersey
CANNABIS REGULATORY COMMISSION

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January 9, 2025

VIA CERTIFIED AND ELECTRONIC MAIL to: regulatory@col-care.com

Ms. Kellie Rivera
321 Billerica Road
Suite 204
Chelmsford, MA 01824

Re: NOTICE OF VIOLATION – Columbia Care New Jersey LLC; INV 02 25

Dear Ms. Rivera,

This letter is a Notice of Violation, issued by the New Jersey Cannabis Regulatory Commission ("NJ-CRC") in accordance with N.J.A.C. 17:30-8 to Columbia Care New Jersey LLC ("Columbia Care"). An investigation which commenced on December 23, 2024, and remains ongoing as of the date of this Notice revealed that Columbia Care or members thereof interfered at a regular union meeting. As the investigation remains ongoing, this Notice of Violation satisfies the NJ-CRC's responsibility to issue this Notice within seven business days following the identification of the violation, as required by N.J.A.C. 17:30-20.4. This Notice puts Columbia Care in violation of N.J.A.C. 17:30-9.4(h) and N.J.S.A. 24:6I-7.2(e):

1. **Violation 1: N.J.S.A. 24:6I-36(c):** Failure to enter, or to make a good faith effort to enter, into a collective bargaining agreement within 200 days of the opening of a licensed cannabis establishment, distributor, or delivery service, other than an establishment that is a microbusiness, shall result in the suspension or revocation of the establishment's, distributor's, or delivery service's license.
2. **Violation 2:** N.J.A.C. 17:30-9.4 Ongoing material conditions and general requirements applicable to cannabis business license holders

(h) Where a majority of the employees of a cannabis business, including an expanded ATC, have voted to join a bona fide labor organization, failure to enter into a collective bargaining agreement within 200 days of the opening of such licensed cannabis business, may result in a referral to the National Labor Relations Board.

3. **Violation 3:** N.J.S.A. 24:6I-7.2(e)

The failure to enter into a collective bargaining agreement within 200 days after the date that a medical cannabis cultivator, medical cannabis manufacturer, or medical cannabis dispensary first opens shall result in the suspension or revocation of such permit or conditional permit.

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

Columbia Care has acted in violation of the Jake Honig Act, the CREAMM Act, and the implementing regulations by interfering at a ratification meeting, which is determined as a regular union meeting, where the meeting was tainted by the presence of a representative of management. This shows a failure to make a good faith effort to enter into a collective bargaining agreement within 200 days of the opening of Columbia Care's cultivation facility.

The NJ-CRC hereby orders Columbia Care to immediately conform its operations with the statute and regulation. The NJ-CRC reserves the right to impose sanctions for this regulatory violation.

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,

A handwritten signature in black ink, appearing to read "P. Urbish", is enclosed within a thin black rectangular border.

Paul Thomas Urbish, Esq.
Director
Office of Compliance and Investigations
New Jersey Cannabis Regulatory Commission