State of New Jersey
CANNABIS REGULATORY COMMISSION
P.O. BOX 216
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September 30, 2025

VIA CERTIFIED AND ELECTRONIC MAIL
to: [redacted]

Re: NOTICE OF VIOLATION –**Zen Leaf Mount Holly, LLC;** INV (122-25)

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 Zen Leaf Mount Holly, LLC ("Zen Leaf"). An investigation which commenced on August 29, 2025, and remains ongoing as of the date of this Notice revealed Zen Leaf committed the following violation:

1. **Violation 1**: N.J.A.C. 17:30-14.3(a) **-**Cannabis retailer to a consumer – 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.

2. **Violation 2:** 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.

On August 29, 2025, between the hours of 2:02 pm and 3:14 pm, 34 customers entered the dispensary without Zen Leaf personnel examining their photographic identification. During this timeframe Zen Leaf personnel were not stationed at the dispensary entrance. In lieu of Zen Leaf personnel, a sign that stated "please walk in and scan your ID" was displayed at the dispensary entrance. Moreover, Zen Leaf personnel failed to log the examination of the photographic identification and confirmation of legal age of the 34 customers prior to the customers entering the

dispensary.

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

Zen Leaf has acted in violation of the Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act, N.J.S.A. 24:6I-31 et seq., the adult use regulations, and its Standard Operating Procedures by failing to verify consumer ages via the examination of photographic identification and failing to log the examination of the photographic identification and confirmation of legal age in a record.

The NJ-CRC hereby orders Zen Leaf to immediately conform its operations for photographic identification with the adult use regulations as well as its Standard Operating Procedure on file with the Commission. 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
Pamela Reimers, Investigator, NJ-CRC
Kevin Healey, Chief, NJ-CRC