



## MEMORANDUM

**TO:** CANNABIS REGULATORY COMMISSION BOARD

**FROM:** CHRISTOPHER J. RIGGS, ACTING EXECUTIVE DIRECTOR

**SUBJECT:** COLUMBIA CARE NEW JERSEY LLC PROPOSAL FOR ENFORCEMENT (INV 02 25)

**DATE:** JUNE 12, 2025

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**BACKGROUND:** On January 9, 2025, a Notice of Violation was issued to Columbia Care New Jersey LLC (“Columbia Care”), for violations related to labor relations. The Office of Compliance and Investigations for the New Jersey Cannabis Regulatory Commission (“NJ-CRC”) became aware of this violation through the receipt of an anonymous complaint on December 23, 2024. At that time, an investigation was conducted, and a recommendation was provided via e-mail to the Director of the Office of Compliance and Investigations. Upon a determination by the Director of the Office of Compliance and Investigations that violations had occurred, the matter was presented to Counsel’s Office for consideration. In coordination with Counsel’s Office and the Office of the Executive Director, the Notice of Violation was issued on January 9, 2025. On February 5, 2025, Columbia Care responded to the Notice of Violation, contesting the underlying facts.

### **AUTHORITY:**

#### **N.J. Statutes Annotated § 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.

#### **N.J. Statutes Annotated § 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.

#### **N.J. Admin. Code Title 17, Chapter 30, Subchapter 20 – Monitoring, Enforcement Actions, and Appeal Rights**



**N.J. Admin. Code Title 17, Chapter 30A, Subchapter 13 – Monitoring, Enforcement Actions, Appeal Rights, and Exemption from State Criminal and Civil Penalties for the Medicinal Use of Marijuana**

**IN-DEPTH REVIEW:** Inquiring parties can review the violations committed in the attached January 9, 2025, Notice of Violation. Columbia Care failed to adhere to the Jake Honig Compassionate Use Medical Cannabis Act, (N.J.S.A. 24:6I-1 et seq.) (“Honig Act”), Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act (N.J.S.A. 24:6I-31 et seq.) (“CREAMM Act”), and the implementing regulations, as it relates to labor relations. Columbia Care interfered at, and therefore tainted, a ratification meeting because a representative of management was present. A ratification meeting is determined as a regular union meeting.

Columbia Care did provide a response within 20 business days of receipt of the Notice of Violation, addressing the violations, but failed to provide a Corrective Action Plan.

**RECOMMENDATION:** It is the opinion of staff that Columbia Care has failed to adhere to the requirements imposed by the Honig Act, CREAMM Act, and implementing regulations.

The Office of Compliance and Investigations considers this a violation of the enabling statute and the Commission’s rules and therefore an enforcement action is recommended.