



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
OFFICE OF MARIJUANA POLICY  
162 STATE HOUSE STATION  
19 UNION STREET  
FIRST FLOOR  
AUGUSTA, MAINE 04333-0162

ADMINISTRATIVE & FINANCIAL SERVICES

KIRSTEN LC FIGUEROA  
COMMISSIONER

OFFICE OF MARIJUANA POLICY

ERIK GUNDERSEN  
DIRECTOR

April 19, 2022

**Via USPS First Class Mail and Electronic Mail**

Mr. Jeffery Brusso



**Subject: Notice of Revocation of Registry Identification Card(s)**

Dear Mr. Brusso

The Maine Department of Administrative & Financial Services, Office of Marijuana Policy (Department) is responsible for the administration and oversight of the Maine Medical Use of Marijuana Program (MMMP). Protection for authorized conduct requires compliance with the Maine Medical Use of Marijuana Act and program rules. Pursuant to its authority under 22 M.R.S., Chapter 558-C, §2430-F, the Department revokes the following Registry Identification Card(s): CGR27434. Such revocations are effective three (3) calendar days after the date of this notice.

**I. Justification for revocation:**

The Department's decision to revoke your Registry Identification Card(s) is based on your violations of the Maine Medical Use of Marijuana Act. More specifically, the Department's MMMP field investigation staff have provided the Department with sufficient evidence to demonstrate the following statutory and regulatory violations:

- On December 29<sup>th</sup>, 2021, Field Investigator Victor Cote received information that you were involved in the acquisition and sale of edible marijuana products that were possibly originating from outside the state of Maine. The acquisition and sale involved bottles of Baked Bros THC Syrup, which is a product produced by a company in Arizona. Field Investigator Victor Cote conducted an investigation into this inquiry and as a result of this investigation, and a caregiver inspection, several violations were noted including but not limited to:
  1. In subsequent interviews by Field Investigator Cote, and during an inspection conducted by Field Investigators Cote and Giesecke, it was reported by you that you obtained approximately 100 bottles of these edible products from an unidentified male in a parking lot in Sanford. No documentation could be provided to identify the individual selling the syrups, or to verify that the individual was a Maine registered caregiver. The transaction made with the un-identified vendor is a violation of 22 MRS §2423-A(2)(K-1), Wholesale Purchase from a non-caregiver or dispensary.

2. No documentation could be provided for the acquisition of the Baked Bros THC syrups. This is a violation of 22 MRS §2430-G (1)(A)(1), Failure to Maintain records of all transfers of plants and harvested marijuana.
3. Invoices obtained document your sale of 60 bottles of syrup to Weedhouse on Nov. 05, 2021. At the time that these edible marijuana products were sold you did not hold a valid retail food license, which is a violation of; Selling edibles containing marijuana products without a retail food establishment license as defined in 22 MRS § 2152(7) (A) and required by 22 MRS §2167 and therefore violates 18-691 CMR CH. 2 Section 10(I)(4).

For these reasons, your eligibility to participate in the MMMP has been revoked. Please immediately return your Registry Identification Card to:

Department of Administrative & Financial Services  
Office of Marijuana Policy  
Maine Medical Use of Marijuana Program  
162 State House Station  
Augusta, ME 04333-0162

## **II. Registration Revocation and Right to Request an Informal Hearing:**

Pursuant to 22 M.R.S. §2430-F, the Department may suspend or revoke a registry identification card for violation of Chapter 558-C and the rules adopted by the Department. A person who has had authorization for conduct under Chapter 558-C revoked due to failure to comply with Chapter 558-C and rules adopted by the Department may request an informal hearing. If you would like to request an informal hearing, please notify the Department in writing within thirty (30) calendar days of the revocation effective date at the address information provided above. A request for an informal hearing should be sent to Vernon Malloch, Deputy Director of Operations by email at [Vernon.Malloch@maine.gov](mailto:Vernon.Malloch@maine.gov) or USPS at 162 State House Station, 19 Union Street, Augusta, Maine 04333-0062. If the Department does not receive a hearing request in accordance with the policy, the revocation becomes final.

Sincerely,



Michael W. Field  
Director of Compliance  
Office of Marijuana Policy

Cc: file