



JANET T. MILLS
GOVERNOR

STATE OF MAINE
OFFICE OF CANNABIS POLICY
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ADMINISTRATIVE & FINANCIAL SERVICES

KIRSTEN LC FIGUEROA
COMMISSIONER

OFFICE OF CANNABIS POLICY

JOHN HUDAK
DIRECTOR

June 30, 2025

Bikang Huang
[REDACTED]
[REDACTED]
[REDACTED]

Re: Notice of Administrative Action including Suspension and Monetary Penalty

Bikang Huang CGR31890
OCP Incident Number 2024-MCP-1648

Dear Mr. Huang,

This Notice of Administrative Action is issued pursuant to the *Maine Administrative Procedures Act* (Maine APA), Title 5, Ch. 375, subch. 4, to **Bikang Huang**, Medical Use Cannabis Program (MUCP) **CGR31890** for violations of the *Maine Medical Use of Cannabis Act* (MMUCA), Title 22 M.R.S., Chapter 558-C, and the *Maine Medical Use of Cannabis Program Rule*, 18-691, Ch. 2, as described below. In response to these violations, the Department of Administrative and Financial Services, acting through its Office of Cannabis Policy (OCP), (collectively, "The Department") is taking the administrative actions detailed in this notice.

The licensee named herein is subject to the administrative actions pursuant to MMUCA as described in Part II, and III below that may be timely appealed in accordance with the Maine APA in accordance with Part IV of this Notice. Failure to timely appeal will result in the imposition of the administrative actions described herein.

I. Summary of the medical inspection / investigation of caregiver Bikang Huang:

1. On November 25, 2024, Compliance Inspector Matt Clark was assigned a pre-inspection for a person that had applied to be a caregiver at [REDACTED]. Prior to conducting this pre-inspection Compliance Inspector Clark learned that you as well as two other caregivers Bin Yang (CGR31087) and Liu Hua Zhou (CGR31849) were also listed at this location in the OCP database along with several assistants with RICs. They included Weiyu Chen (RIC21088), Yulong Guo (RIC23565), Jun Ming Li (RIC17166), and Junqin Li (RIC22337).
2. While researching Bin Yang (CGR31087) and Liu Hua Zhou (CGR31849) CI Chris Carr learned that they had been evicted from the location at the beginning of October 2024. Compliance Inspector Chris Carr learned of this information from Zhulei Li (CGR31917) who is the son of Bin Yang. Li was able to explain to CI Carr that both Bin Yang and Liu Hua Zhou were in New York and no longer had

anything to do with the Gardiner location and were voluntarily surrendering their caregiver status.

3. On December 9, 2024, an on-site pre-inspection was conducted at [REDACTED] in Gardiner. You were present along with RIC card holder Yulong Guo (RIC23565), and Weiyu Chen pending (RIC21088/CGR32576).
4. It should be noted that during OCPs entire site visit, a contracted translation service “Language Link” with a Cantonese interpreter, was utilized. Additionally, it was found that Yulong Guo spoke English to help with any translation issues.
5. You along with Weiyu Chen and Yulong Guo admitted living and working at the address. You along with Chen and Guo admitted that you knew that Bin Yang and Liu Hua Zhou had been “evicted” from the property by an unknown individual from New York the first of October 2024. You all admitted that those two caregivers had not been on the property since then.
6. A tour of the location identified multiple violations that prompted the need for a full caregiver inspection to be conducted for your caregiver activities, you being the only caregiver active at the property. The location included a total of six flower rooms, one veg room with several rooms attached to it with clones and seedlings, a drying room full of plants from a recent harvest, and an upstairs bedroom that contained four plastic totes full of fully processed cannabis, estimated to be about 50lbs. Only one of the flower rooms, which had a photocopy of your (Huang’s) caregiver card on the door, was empty. You advised the compliance inspectors that all of the plants from that room had been harvested and processed, accounting for the processed product in the four totes. The other five flower rooms had mature (flowering) plants inside them. Out of those five rooms, only one room upstairs had a photocopy of your caregiver license on the door. You told CI Clark and CI Carr that this room was your only flower room at the current time. This room was identified as “Room #1” below. The canopy was measured by CIS Desjardin in each of the six flower rooms and identified as the following:
 - A. Room #1 2 tables 21’x9’= **378 square feet**- Identified as Bikang Huang’s (CGR card on door)
 - B. Room #2 Empty- Identified as Bikang Huang’s (CGR card on door)
 - C. Room #3 20’x12’= **240 square feet**- Identified as Liu Hua Zhou (CGR card on door)
 - D. Room #4 20’x14’= **280 square feet**- Identified as Liu Hua Zhou (CGR card on door)
 - E. Room #5 23’x32’= **700 square feet**- Identified as Bin Yang (CGR card on door)
 - F. Room #6 18’x15’= **270 square feet**- Identified as Liu Hua Zhou (CGR card on door)

For a total of **1,868 square feet**.

7. You also told the compliance inspectors that the cannabis found in the drying/curing room in the basement had come out of a flower room originally assigned to Liu Hua Zhou. It was evident to compliance inspectors that it had been recently harvested in the past couple of weeks and was being dried and cured so it could be processed for sale.

8. Through further conversation with OCP inspectors, you further stated that while Bin Yang and Liu Hua Zhou were actively growing at the location, you had maintained the clones, seedlings, and veg plant rooms. When one of the other caregiver's flower rooms were harvested ("taken down") they would transfer enough veg plants from that room to reload the caregiver's flower room. No transfer paperwork was ever completed to show how many plants were transferred or how many times this was done prior to their eviction.
9. You admitted that you and your two two assistants, Yulong Guo and Weiyu Chen had been maintaining all cultivation activities, even after you knew that Bin Yang and Liu Hua Zhou had been "evicted" and moved out two months prior. You all told OCP compliance inspectors that you had been told by the "unknown" business operator in New York, to continue operations as normal as there were three caregivers registered at the location. You further stated that you were told by the business operator you could continue maintaining the cannabis plant canopy of Bin Yang and Liu Hua Zhou that had been growing all along. A greater canopy limit, allowed for more cannabis sold which created more income for not only you and your assistants, but also for the "unknown" business operator in New York.
10. You also admitted you had a "friend" make deliveries of your medical cannabis though you could not provide his name and had no proof that this "friend" was registered with OCP.
11. You, Chen and Guo agreed to cut down the plants from all the other flower rooms, leaving only the one that had been identified as yours. This brought the total plant canopy at the location to 378 square feet, which was within the 500 square foot license maximum allowance under your caregiver registration.
12. Additionally, it was decided that since you had identified the processed cannabis in the totes as having come out of your empty flower room downstairs, you were allowed to keep that, however, the cannabis in the drying/curing room was not grown legally under your license and was not your cannabis and this you all agreed to discard as well.
13. It was decided that OCP compliance inspectors would give you and your assistants until 1000hrs the following day (December 10, 2024) to harvest the non-compliant canopy and discard the harvested cannabis in the drying/curing room.
14. During conversation with OCP inspectors, it was discussed that it was your responsibility, as well as both Guo and Chen, who are also licensed as RICs, to maintain a working knowledge of current rules and statutes in the medical cannabis program to remain compliant.
15. The following day, December 10, 2024, CIS Desjardin and CI Clark returned to the address and found about 20 bags of cannabis plants outside around the dumpster. The plants had apparently been harvested before light snow had fallen overnight. You gave a tour of the location to OCP compliance inspectors which confirmed that all non-compliant flowering plants had been harvested and discarded outside in the trash. It was determined that you had failed to discard the cannabis drying and curing in the dry room in the basement. Upon discussing this with you, it was apparent that you and your assistants had hoped that it would be overlooked. You and your assistants decided to bag that cannabis up while the inspectors were on site and render the product unusable.

16. The City of Gardiner requires persons cultivating medical cannabis to be licensed by the city and you failed to apply for a license for many months. As a result, when you applied for a New Cannabis Cultivator Tier 2 license, the City of Gardiner denied your application.
17. On June 12, 2025, CI Clark, accompanied the Gardiner Code Enforcement Officer to [REDACTED] in Gardiner, to conduct a site visit at your cultivation location. The purpose of the visit was for Code Enforcement to ensure that you were aware of the municipal denial issued on June 4, 2025 and determine whether you were still conducting caregiver activities at the location.
18. Upon conducting a walkthrough of the building, it was discovered that there was a room full of clones, another room containing immature cannabis plants, and two full rooms of mature (flowering) cannabis plants. One of those mature cultivation rooms was located upstairs, while the other was found downstairs.
19. Compliance Inspector Supervisor Mark Desjardin measured the canopy in each of the two mature rooms, determining that the upstairs room measured a total of 640 square feet of mature flowering canopy, while the room downstairs measured a total of 650 square feet of mature flowering canopy, for a total of 1290 square feet. You are registered to grow up to 500 square feet of canopy, so it was determined that you were again cultivating in excess of 250% of your authorized canopy (790 square feet over your authorized canopy limit).
20. You apologized for being over your canopy limit, stating that it won't happen again and you voluntarily destroyed all the mature plants in the upstairs room and some in the downstairs room so that you were operating at your maximum allowable canopy at 500 square feet.

II. Summary findings of fact and violations:

The Department finds, based upon its investigation, interviews, and inspection the following:

1. On December 9, 2024, you and your assistants admittedly continued to maintain a mature (flowering) plant canopy 1490 square feet over your allowable 500 square foot canopy. You and your assistants knowingly continued to do so since at least October 1, 2024, when the two other previous caregivers were "evicted" from the property and were no longer actively participating in the medical program at that location. This is a violation of:

22 M.R.S. § 2423-A (2)B) Plant Canopy- Exceeding 500 square feet.

and

22 M.R.S. § 2430-I (1-A) (B)(7) a Major registration violation: Cultivating cannabis plants in an amount that is equal to or greater than 150% of the total number of cannabis plants or plant canopy the registrant is authorized to cultivate under this chapter.

2. Your cultivation includes multiple cultivation rooms that do not have locks, and in some cases, do not contain doors preventing unauthorized access by other

individuals working and living at the address of [REDACTED] Gardiner, Maine that are unauthorized to have access. This is a violation of:

Title 22 MRS § 2423-A (3) (B) Access/ Allowing unauthorized access to a cultivation location

and

18-691 C.M.R. Ch. 2 § 3 (B) (2) Locks/ Failure to maintain adequate door/window locks

3. You allowed unregistered caregiver assistants make deliveries of harvested cannabis. You are required to identify any individuals you employ that will have access to your cultivation and/or harvested product. Those identified individuals are required to obtain a Registry Identification Card (RIC) from the Office of Cannabis Policy and you are required to maintain an employee file for each of those employees in compliance with OCP rules/statutes. This is a violation of:

22 M.R.S. § 2425-A (2) Caregiver / Expired or unregistered caregiver assistants

4. As described above, you are required to maintain an employee file for each employee assisting you with your cultivation or with processing/delivering harvested cannabis products. This is a violation of:

18-691 C.M.R. Ch.2 § 6 G (2) Caregiver/ Assistant Personnel Files- None or inadequate

5. You provided just two trip tickets and invoices showing two sales to another caregiver. Trip tickets are required to be completed entirely to include Section 6 "Receiving Registration Signature and Acknowledgement of Receipt". This requires the printed name of the individual receiving the cannabis product as well as the date and time that the product is received, which was not the case with either of those two trip tickets. This is a violation of:

18-691 .M.R. Ch. 2 § 6(A)(2) and 7(Q)(1) Trip tickets/ failure to utilize.

6. You failed to apply for a license in Gardiner for several months, resulting in your recent application for a license to cultivate cannabis being denied by the City of Gardiner, a violation of:

22 MRS § 2430-I(1-A)(C)(4).

7. On June 12, 2025, while at your cultivation location with Gardiner Code Enforcement, Compliance Inspectors discovered that you had 1290 square feet of mature (flowering) canopy which is 790 square feet over your authorized 500 square feet of canopy. This is a violation of:

22 M.R.S. § 2423-A (2)B) Plant Canopy- Exceeding 500 square feet.

and

22 M.R.S. § 2430-I (1-A) (B)(7) a Major registration violation: Cultivating cannabis plants in an amount that is equal to or greater than 150% of the total number of cannabis plants or plant canopy the registrant is authorized to cultivate under this chapter.

III. Summary of administrative actions taken by the Department:

1. For Bikang Huang on December 9, 2024, cultivating mature cannabis plants exceeding authorized canopy more than 150% of his authorized mature plant canopy in violation of Title 22 MRS § 2423-A (2)B), which is a major registration violation, Title 22 MRS § 2430-I (1-A) (B)(7) cultivating cannabis plants in an amount that is equal to or greater than 150% of the total number of cannabis plants or plant canopy the registrant is authorized to cultivate under this chapter.

Pursuant to its authority under 22 M.R.S., Chapter 558-C, §2430-I (3) & (8) (A) (3) OCP imposes a fine of **\$600 and suspends for one year the following Registry Identification Card belonging to Bikang Huang CGR31890.** The fine is to be remitted to the Department no later than 120 days from the date of this notice.

22 MRSA § 2430-I(8)(C): During the time Bikang Huang's Registry Identification Card is suspended the Department does not permit him to transfer that card to any other person.

2. For Bikang Huang on June 12, 2025, cultivating mature cannabis plants exceeding authorized canopy more than 150% of his authorized mature plant canopy in violation of Title 22 MRS § 2423-A (2)B), which is a major registration violation, Title 22 MRS § 2430-I (1-A) (B)(7) cultivating cannabis plants in an amount that is equal to or greater than 150% of the total number of cannabis plants or plant canopy the registrant is authorized to cultivate under this chapter.

Pursuant to its authority under 22 M.R.S., Chapter 558-C, §2430-I (3) & (8) (A) (3) OCP imposes a fine of **\$600 and suspends for one year the following Registry Identification Card belonging to Bikang Huang CGR31890.** The fine is to be remitted to the Department no later than 120 days from the date of this notice.

22 MRSA § 2430-I(8)(C): During the time Bikang Huang's Registry Identification Card is suspended the Department does not permit him to transfer that card to any other person.

3. In response to Bikang Huang, allowing access to his cultivation areas that were not secure and not having adequate locks. 22 M.R.S. § 2423-A (3) (B) and 18-691 C.M.R. Ch. 2 § 3 (B) (2).
 - a. OCP has issued Technical Assistance
4. In response to Bikang Huang allowing unregistered caregiver assistants to. 22 M.R.S. § 2425-A (2)
 - a. OCP has issued Technical Assistance
5. In response to Bikang Huang not maintaining any employee files. 18-691 C.M.R. Ch.2 § 6 G (2).
 - a. OCP has issued Technical Assistance
6. In response to Bikang Huang not using trip tickets when transporting cannabis to another location. 18-691 C.M.R. Ch. 2 § 6(A)(2) and 7(Q)(1).
 - a. OCP has issued Technical Assistance
7. In response to the City of Gardiner denying you a cultivation license.

- a. The Department will rely on the City of Gardiner to enforce its ordinance.

IV. Summary of administrative appeal rights:

The Department issues this Notice of Administrative Action in accordance with its authority pursuant to 28-B MRS § 801 and the Maine APA, 5 MRS, Ch. 375. If you disagree with the Department's findings of fact or administrative actions, you may timely request a formal hearing within 30 days from the date of this Notice. Failure to timely request a formal hearing of the Department will result in this Notice of Administrative Action including Monetary Penalty becoming the FINAL ORDER of the Department. You will not be able to petition for a review in Superior Court and it could impact your continued participation in the programs administered by the Office of Cannabis Policy.

A request for a formal hearing may be sent via e-mail to Deputy Director Vernon Malloch: Vernon.Malloch@maine.gov or via USPS mail to: Office of Cannabis Policy, 162 State House Station, Augusta, Maine 04333.

Sincerely,



Dean Goodale
Director of Compliance
Office of Cannabis Policy

Cc: Director John Hudak, Office of Cannabis Policy
Deputy Director Vernon Malloch, Office of Cannabis Policy
Anya Trundy, Office of the Commissioner
Deanna White, Esq., Office of the Attorney General