

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

ADMINISTRATIVE & FINANCIAL SERVICES

KIRSTEN LC FIGUEROA

OFFICE OF CANNABIS POLICY

JOHN HUDAK DIRECTOR

August 5, 2025

Alla Alexandrin (CGR32273) DBA Puff Box

Re: Notice of Administrative Action including Monetary Penalty OCP Incident # 2025-MCP-682

Dear Alla Alexandrin,

This Notice of Administrative Action is issued pursuant to the *Maine Administrative Procedures Act* (Maine APA), Title 5, Ch. 375, subch. 4, to **Alla Alexandrin**, Medical Use Cannabis Program (MUCP) **CGR32273** 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, III and IV below that may be timely appealed in accordance with the Maine APA in accordance with Part V of this Notice. Failure to timely appeal will result in the imposition of the administrative actions described herein.

- I. Summary of the investigation and subsequent medical caregiver inspection of Alla Alexandrin:
 - 1. Alla Alexandrin (CGr32273) is a licensed caregiver with retail authority to operate Puff Box of Augusta, a caregiver retail store located at 921 Eastern Avenue in Augusta.
 - 2. On May 8, 2025, a contracted compliance agent (CA) for the Office of Cannabis Policy, was conducting random spot checks of local medical cannabis businesses to ensure sales were only being made to qualifying patients. The compliance agent is not a qualifying patient and does not have a medical certificate to purchase medical cannabis.
 - 3. At around 12:30 pm, the contracted CA reported that they entered the Puff Box of Augusta and purchased 1/4 oz of medical cannabis (flower). The sale was made to the contracted CA after the agent verbally told the employee that they (the agent)

- were not a medical patient and did not have a medical certificate to purchase medical cannabis.
- 4. Upon reviewing the contracted CA's report, it was learned that on May 8, 2025, around 12:30 pm, the contracted CA entered Puff Box of Augusta, at which time the agent was greeted by the only employee in the store. That female employee was later identified by the agent as Courtney Fijak.
- 5. The contracted CA asked Ms. Fijak if the business sold medical or recreational and was told that it was a medical store. When Ms. Fijak learned that the contracted CA did not have a medical card, Ms. Fijak told the agent that she would not send the contracted CA to another location but rather would conduct a sale under her (Fijak's) medical card and store account. The contracted CA went on to purchase 1/4oz of cannabis flower for \$31.65, for which the agent was provided a receipt.
- 6. After the sale, the contracted CA returned to their vehicle and completed a Notice of Violation to serve Ms. Fijak. When the contracted CA re-entered, the business, the agent identified themselves as an inspector with the Office of Cannabis Policy. Ms. Fijak was issued a Notice of Violation for the sale to a non-patient.
- 7. The contracted compliance agent's interactions with Ms. Fijak were audio and video recorded, and the footage was reviewed and found to be consistent with what the CA had reported.
- 8. Office of Cannabis Policy records show that Courtney Fijak has never been registered as a caregiver assistant as required by statute, to work in the medical cannabis program.
- 9. On May 14, 2025, Office of Cannabis Policy Inspectors Matthew Clark and Christopher Carr met with Alla Alexandrin at Puff Box of Augusta, after scheduling a meeting with her to discuss the incident. Also present during that meeting was Alexandrin's store manager, identified as Makayla Damon.
- 10. Upon speaking with Ms. Damon, the inspectors were advised that Ms. Fijak was hired as an employee to work in the store, starting on January 14, 2025. Ms. Damon stated that she had spoken with Ms. Fijak at the time of her being hired but never confirmed that she had obtained a registry identification card (RIC) before working there.
- 11. A check of the required employee file for Courtney Fijak found that there was only a copy of her driver's license along with tax documents. The employee file is required to contain a copy of the employee's registry identification card (RIC) as well as a job description and neither were present in violation of current rules regarding employee files.
- 12. It was determined that Alla Alexandrin and Ms. Damon both failed to ensure that Ms. Fijak obtained her RIC before starting work in January 2025. It is also clear that Ms. Fijak continued to work at the Puff Box of Augusta for four months without being registered with the Office of Cannabis Policy.
- 13. While OCP Inspectors met with Alla Alexandrin and Ms. Damon inside the caregiver retail store, several obvious violations were observed which included unsecure cannabis product that was readily accessible to the public. Due to this as

well as the previously determined violation involving inadequate employee files, a subsequent caregiver inspection was conducted with Ms. Alexandrin on this date.

- 14. During the inspection, it was determined that Ms. Alexandrin is advertising her business with a business website "puffboxofaugusta.com". It was determined that the website advertises cannabis products for sale but is not age restricted to prevent underage persons from reaching the website contents as required.
- 15. Additionally, it was determined that Ms. Alexandrin has failed to retain any records of harvested cannabis transfers to or from her business partner, Mark Londo, a licensed caregiver who operates Puff Box in Madison, Maine.

II. Summary findings of fact and violations:

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

1. The Puff Box, a caregiver retail store, more specifically employee Courtney Fijak, transferred cannabis product to a person who is not a qualifying patient. This is a violation of:

Title 22 M.R.S. § 2423-A (2)A-1. Authorized conduct for the medical use of cannabis. Sales to a person who is not a qualified patient.

And

Title 22 M.R.S., Chapter 558-C section 2430-I (4) (A) Administrative penalty for sale or transfer to nonpatient states:

The first time a covered entity or covered entity agent sells, furnishes or gives cannabis for medical use to a person who is not authorized to possess cannabis for medical use under this chapter, the covered entity or covered entity agent that sold, furnished or gave cannabis for medical use to a person not authorized to possess cannabis for medical use may be subject to an administrative penalty for a minor registration violation.

- 2. Caregiver / Expired or unregistered caregiver assistants 22 M.R.S. 2425-A (2). All employees are required to obtain a Registry Identification Card (RIC) from the Office of Cannabis Policy.
- 3. Caregiver/ Assistant Personnel Files- None or inadequate (18-691 CMR Ch.2 Sec. 6 G (2)) As described above, Alexander is required to maintain a complete and up to date employee file for each employee.
- 4. Alla Alexandrin has failed to document and retain business records of harvested cannabis transfers to and from her business partner, Marc Londo (CGR29642). This is a violation of Title 22 M.R.S., Chapter 558-C section 2430-J (1) (A).

III. Summary of administrative actions taken by the Department:

1. In response to Puff Box, Caregiver Alla Alexandrin, transferring harvested cannabis to a person who is not a qualified cannabis patient in violation of the Maine Medical Use of Cannabis Act:

- a. OCP imposes the following fine against Caregiver Alla Alexandrin CGR32273:
 \$1000 for a minor violation in accordance with section 2430-I (3)
 (B)(1) of the Maine Use of Cannabis Act, to be remitted to the Department no later than 120 days from the date of this notice.
 - B. For a covered entity, except a registered caregiver who does not operate a retail store:
 - (1) Not more than \$1,000 for each minor registration violation
- 2. In response to Puff Box, Caregiver Alla Alexandrin, having an unregistered employee working at her store:
 - a. The department has provided technical assistance.
- 3. In response to Caregiver Alla Alexandrin not having adequate assistant personnel files:
 - a. The department has provided technical assistance.
- 4. In response to Caregiver Alla Alexandrin not retaining all records of for sales and purchases of harvested cannabis:
 - a. The department has provided technical assistance.
- 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: <u>Vernon.Malloch@maine.gov</u> 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