



JANET T. MILLS
GOVERNOR

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

ADMINISTRATIVE & FINANCIAL SERVICES

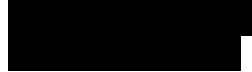
KIRSTEN LC FIGUEROA
COMMISSIONER

OFFICE OF CANNABIS POLICY

JOHN HUDAK
DIRECTOR

August 14, 2025

Wen Bin Zhao (CGR32365)



Re: Notice of Administrative Action including Monetary Penalty and Revocation of Registry Identification Cards.

OCP Incident # 2025-MCP-722

Dear Mr. Zhao,

This Notice of Administrative Action is issued pursuant to the *Maine Administrative Procedures Act* (Maine APA), Title 5, Ch. 375, subch. 4, to **Wen Bin Zhao**, Medical Use Cannabis Program (MUCP) **CGR32365** and **RIC22604** 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 related conversation with Wen Bin Zhao:

1. On February 25, 2025, Inspectors conducted an inspection with Wen Bin Zhao (CGR32365) at his registered cultivation location, located at [REDACTED] Jay, Maine. During that inspection, Mr. Zhao had a total of 210 mature (flowering) cannabis plants that measured 288 square feet of canopy actively growing at the location. Mr. Zhao is registered as a canopy cultivator, which allows up to 500 square feet of mature canopy.
2. On May 15, 2025, several Compliance Inspectors with the Office of Cannabis Policy, were assigned to assist in a search warrant conducted by the Kennebec County Sheriffs' Office. Law Enforcement's purpose of the warrant was to search for evidence of an illegal/unregistered cannabis cultivation operation at the address of 750 Oakland Road in Belgrade. The address had been checked through

OCP's database previously, where it was confirmed that the address had not been registered as a legal cannabis cultivation location.

3. The purpose for OCP's involvement was to assist law enforcement with identifying plants, common cultivation processes, and any other pertinent information required that would assist in their investigation.
4. The residence of 750 Oakland Road was found to be a white farmhouse with a large breezeway attaching a two-story barn. The location was found to have been converted into multiple cultivation rooms, with three rooms found that were actively growing cannabis.
5. Inside the breezeway there was an active cultivation room, containing cannabis plants in vegetative growth. The room, later identified as Room #1, was found to contain a total of 140 plants.
6. The second floor of the barn was found to contain a large room (measured at 1085 square feet of space by tax documents) with about 80-85% of the room full of mature (flowering) cannabis plants. There was a total of 328 plants in this room.
7. The last active cultivation room found on the property was located at the far end of the home on the first floor. This room contained seedlings and clones. In total, there were an additional 275 plants found growing in this room.
8. OCP representatives were tasked with identifying plants and counting them in the grow rooms. In total, the property contained 743 illegal/unregistered cannabis plants actively growing, including about 850-900 square feet of mature cannabis plant canopy in the second-floor room of the barn.
9. At the time that law enforcement executed the warrant, no people were present inside the home. It was later determined, through law enforcements investigative efforts to obtain their search warrant, that they had identified a suspect, Wen Bin Zhao D.O.B. (██████████).
10. On May 19, 2025, Inspectors spoke further with Detective Jon Bourque of the Kennebec County Sheriffs' Office. Det. Bourque is the law enforcement investigator in charge of the investigation at 750 Oakland Road in Belgrade. While speaking with Det. Bourque, it was learned that he was still working on a criminal case involving Wen Bin Zhao and advised that he had made numerous connections to Mr. Zhao and the illegal/unregistered cultivation located at 750 Oakland Road in Belgrade. Those connections were provided as follows:
 - a. A gray 2025 Toyota Sienna van, which is registered to Wen Bin Zhao, has been documented at the address of 750 Oakland Road in Belgrade on December 12, 2025, February 12, 2025, and March 3, 2025.
 - b. Central Maine Power has two active accounts under Wen Bin Zhao at the address of 750 Oakland Road in Belgrade with extremely high-power usage.
 - c. During the execution of the search warrant at 750 Oakland Road in Belgrade, A box of aerosol insecticide was found inside the property with a shipping label to Wen Bin Zhao at the address of 750 Oakland Road in Belgrade.

11. On May 30, 2025, neighbors had called the Sheriffs' Office to advise that there were individuals at 750 Oakland Road in Belgrade, that were removing equipment from the location. Deputies responded and identified Wen Bin Zhao as one of the individuals on site. Det. Bourque was not working but requested that Wen Bin Zhao be issued a criminal summons for Class B Cultivation of Cannabis by the responding deputy that same date.
12. This investigation went on hold for some time while Det. Bourque drafted a search warrant for video evidence from cameras that were seized inside the cultivation rooms at 750 Oakland Road in Belgrade.
13. On June 17, 2025, Compliance Inspector Matt Clark learned that Det. Bourque had obtained and executed a warrant for the data on the SD cards found in the cameras that were taken as evidence from the cultivation rooms. The SD cards yielded numerous photos to include individuals in the grow room on May 14, 2025, at 1853hrs, just hours before the Kennebec County Sheriffs' Office executed the search warrant at the location.
14. On June 18, 2025, Compliance Inspector Matt Clark previously familiar with Mr. Zhao responded to the Kennebec County Sheriffs' Office and reviewed the photos with Det. Bourque. Based on previous interactions with Wen Bin Zhao, Investigators were confident that one individual with a large tattoo on the underside of his right forearm was Wen Bin Zhao.
15. On July 3, 2025, Compliance Inspector Matt Clark conducted a site visit and had a conversation with Mr. Zhao at his residence, located at [REDACTED] Jay, Maine. During that conversation, through a Cantonese translator with Language Link, the following facts and admissions were noted:
 - a. The individual in the video captured from the cultivation cameras was positively identified as Wen Bin Zhao. His identity was confirmed by the large unique tattoo on the underside of his right forearm.
 - b. Mr. Zhao admitted to operating the unregistered cultivation grow at 750 Oakland Road in Belgrade, stating that he did so to grow more plants, which creates more harvested cannabis to sell to make more money.
 - c. Mr. Zhao denied selling cannabis to unregistered individuals or taking the product out of state. Instead, he provided wholesale business records, admitting to combining harvested cannabis from his illicit grow with his registered grow and selling it to registered businesses in the medical cannabis market. Thus, Mr. Zhao has admitted to the inversion of illicit cannabis into Maine's regulated medical market.
16. At the time of the site visit, Mr. Zhao was found to have a total mature canopy of 264 square feet, very similar in size to what was found at his previous inspection in February 2025.
17. Zhao was provided with a Notice of Violation for the following:
 1. Exceeding plant canopy limit over 150%,
 2. Illegal practices or unauthorized conduct.

II. Summary findings of fact and violations:

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

1. Wen Bin Zhao has been growing cannabis at an unregistered location and admitted to combining the cannabis from his illicit grow with cannabis from his registered grow location which is intentionally or knowingly purchasing or transferring from the illicit market cannabis or cannabis products that are offered for sale or transfer to qualifying patients or combined with harvested cannabis or cannabis products for medical use. This is a violation of:

Title 22 M.R.S., Chapter 558-C section 2430-I(1-A)4.

2. By cultivating cannabis at his registered location and at the unregistered location, Wen Bin Zhao exceeded his mature plant canopy limit by over 150%. 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 Wen Bin Zhao, intentionally or knowingly transferring from the illicit market cannabis or cannabis products that are combined with harvested cannabis or cannabis products for medical use in violation of Title 22 M.R.S., Chapter 558-C section 2430-I(1-A)4, which is a Major Violation Affecting Public Safety.

Pursuant to its authority under 22 M.R.S., Chapter 558-C, §2430-I (3) & (8) (A) (3) OCP imposes a fine of **\$1500 and revokes the following Registry Identification Cards belonging to Wen Bin Zhao CGR32365 and RIC22604**. The fine is to be remitted to the Department no later than 120 days from the date of this notice.

2. For Wen Bin Zhao, 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 to Wen Bin Zhao CGR32365**. The fine is to be remitted to the Department no later than 120 days from the date of this notice.

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,

A handwritten signature in black ink, appearing to read "Dean Goodale", written in a cursive style.

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