



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

VERNON MALLOCH
INTERIM DIRECTOR

January 24, 2023

Via Electronic Mail and USPS First Class Mail

Peguy Lubin
934 Lisbon St.
Lewiston, ME 04240-6128



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

Dear Mr. Lubin,

The Maine Department of Administrative & Financial Services, Office of Cannabis Policy (Department) is responsible for the administration and oversight of the Maine Medical Use of Cannabis Program (MMCP). Protection for authorized conduct requires compliance with the Maine Medical Use of Cannabis 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): CGR29175. 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 violation of the Maine Medical Use of Cannabis Act. More specifically, the Department's MMCP field investigation staff have provided the Department with sufficient evidence to demonstrate the following statutory and regulatory violations:

- Between September 24th, 2022, and October 29th, 2022, Maine Sheriffs' Association agents, who are not certified patients, made three purchases from your store. On September 26th, 2022, Field Investigator Victor Cote conducted a routine inspection at your retail location, 207 High, 934 Lisbon St. Lewiston, ME and follow-up visits on September 30th, 2022, and November 8th, 2022. As a result of these purchases, the caregiver inspection, and visits by FI Cote, several violations were noted including but not limited to:
 1. On September 24th, 2022, a Maine Sheriffs' Association agent, who is not a certified patient, purchased two pre-rolls at 207 High. The transaction with a non-patient is a violation of 22 MRS § 2423-A (2)A-1, Sale to a person who is not a qualified patient. Since the agent is not otherwise authorized to possess medical cannabis, the transaction also calls for a mandatory revocation of that person's registry ID card. 22 MRS § 2430-F (2).

2. On October 15th, 2022, a Maine Sheriffs' Association agent, who is not a certified patient, purchased two pre-rolls at 207 High. The transaction with a non-patient is a violation of 22 MRS § 2423-A (2)A-1, Sale to a person who is not a qualified patient. Since the agent is not otherwise authorized to possess medical cannabis, the transaction also calls for a mandatory revocation of that person's registry ID card. 22 MRS § 2430-F (2).

3. On October 29th, 2022, a Maine Sheriffs' Association agent, who is not a certified patient, purchased three pre-rolls at 207 High. You admitted that you made the sale. The transaction with a non-patient is a violation of 22 MRS § 2423-A (2)A-1, Sale to a person who is not a qualified patient. Since the agent is not otherwise authorized to possess medical cannabis, the transaction also calls for a mandatory revocation of that person's registry ID card. 22 MRS § 2430-F (2).

4. You have been selling edible marijuana products without a 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 18-691 CMR Ch.2 Sect. 6(J).

5. During the inspection in September, and the non-patient purchases listed above, packaging was observed that did not meet one or more of the following requirements: tamper evident, opaque, child resistant, and containing a signifier that the package contains harvested marijuana. This is a violation of 22 MRS § 2429-A (1).

6. During the inspection in September, and for the first two non-patient purchases listed above, several records or documentation of wholesale and retail transfers of cannabis products could not be produced as required by 22 MRS §2430-G (1)(A)(2).

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

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

II. Registration Revocation and Right to Request an Administrative 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 administrative hearing. If you would like to request an administrative 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 administrative hearing should be sent to Vernon Malloch, by email at 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 Cannabis Policy

Cc: file