



JANET T. MILLS  
GOVERNOR

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

ADMINISTRATIVE & FINANCIAL SERVICES

KIRSTEN LC FIGUEROA  
COMMISSIONER

OFFICE OF CANNABIS POLICY

JOHN HUDAK  
DIRECTOR

December 12, 2024

Weiyu Chen  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject: Notice of Revocation of Registry Identification Card**

Dear Weiyu,

The Maine Department of Administrative & Financial Services, Office of Cannabis Policy (the Department) is responsible for the administration and oversight of the Maine Medical Use of Cannabis Program (MMUCP). The Department hereby revokes the following Registry Identification Card: **WEIYU CHEN, RIC21088**. This revocation is effective three (3) calendar days after the date of this notice.

**Justification for revocation:**

On November 7, 2024, the Office of Cannabis Policy (OCP) received an application to be a caregiver in the Maine Medical Use of Cannabis Program (MMUCP) from Weiyu Chen (Chen), who already held a registry identification card. On this caregiver application, Chen indicated that he resides at [REDACTED] and proposed to grow medical cannabis at this same address. Chen indicated that the owner of this property is “Robin”, but municipal and county records show the property is owned by STRR1 LLC. When asked to provide a copy of State-issued photographic identification issued by the state in which you currently reside, Chen provided a New York State Driver License with an address of [REDACTED]. The application became complete on November 23, 2024, when Chen supplied OCP with information that had been missing on his application, and was referred to OCP’s Compliance Division for pre-inspection.

On November 25, 2024, OCP Field Investigator Matthew Clark, (FI Clark) was assigned to conduct the pre-inspection for Chen. The address of [REDACTED] is known to FI Clark as it has been involved in compliant and non-compliant, as well as suspected illegal, activity in the past. It is also the current address of three (3) caregivers already registered with OCP, Bin Yang (CGR31087) (Yang), Liu Hua Zhou (CGR31849) (Zhou), and Bikang Huang (CGR31890) (Huang). OCP Field Investigator Christophe Carr (FI Carr) asked to assist in conducting the pre-inspection at the location, as he received a text from another caregiver (Zhulei Li CGR31917) (Li) while he had been out on vacation on November 8, 2024. In those texts, Li indicated that his mother, Yang, and her friend, Zhou, had both been evicted from that address by an unknown

male out of New York who appears to be controlling the activity at the location. Through further phone conversations, Li stated to FI Carr that both Yang and Zhou had moved away October 1<sup>st</sup> and wanted to voluntarily terminate their caregiver registration cards so as not to be tied to any illegal activity connected to that location. Copies of their caregiver cards and letters explaining they wanted to terminate their caregiver registration cards were later sent to FI Carr before being mailed to OCP.

On December 4, 2024 FI Clark and FI Carr (collectively “the FIs”) stopped by the address of [REDACTED] where they attempted to complete the pre-inspection. They found no one present at the location. What was noted while on site was that nearly all mini splits were operating at the time of their visit. The FIs estimated that to be between 10-12 mini splits, which seemed extreme for only one registered caregiver (only Huang remained) operating out of that address. A call to Chen determined that everyone was out of state at the time of the visit. An appointment of December 9, 2024 at 12:00. It was also requested that Huang also be present for the visit.

FI Clark checked with the Gardiner Code Enforcement Officer, Kris McNeil, (CEO McNeil) as the city requires all caregiver to register with them. Upon checking that address, neither Huang nor Chen had registered with Gardiner, in violation with their ordinance.

On December 9, 2024 at 12:00 the FIs returned back to the address and met with three individuals at the location, Huang, Chen and Yulong Guo (Guo), whom holds a registry identification card to work as assistant within the MMUCP (RIC23565). FI Clark utilized a contracted translation service “Language Link” with a Cantonese interpreter during the pre-inspection. Additionally, it was found that Guo spoke English and was able to assist in translation issues. Chen confirmed he is living and working at the address. The FIs felt Chen had been coached with the answers to provide when asked basic compliance questions about the program. He did not know where he intended to sell his harvested product if approved by OCP, but did know it had to be sold to someone else registered in the medical program.

Multiple major violations were found at the address, causing FI Clark to question Chen’s willingness and/or intent to operate in compliance with the MMUCP. Those site violations include the following:

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

The cultivation site 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] that are unauthorized to have access.

2) Caregiver/Expired or unregistered caregiver assistants (22MRS 2425-A(2)):

Unregistered assistants had been allowed to work in the cultivation rooms and make deliveries of harvested cannabis. Additionally, Chen had been working in cultivation rooms assigned to two caregivers that he knew had been evicted two months prior.

3) Caregiver Assistant Personnel Files-None or Inadequate (18-691 CMR Ch.2 Sec. 6(G)(2)):

Chen had been working at the location with no assistant files for him as required by current rule/statute.

4) Collective/Operating a prohibitive collective (22 MRS 2430-F(7)):

Chen was working in a prohibited collective due to access issues described above (#1), as well as the fact that caregivers have failed to maintain independent transfer records of plant and harvested cannabis product.

5) Locks/ Failure to maintain adequate door/window locks (18-691 CMR Ch. 2 Sec. 3(B)(2)):

See "Access" violations described above in #1.

6) Plant Canopy- Exceeding 500 square feet (22 MRS 2423-A(2)(B)):

Chen was continuing to work, helping maintain a mature (flowering) plant canopy 1472 square feet over the allowable 500 square foot canopy for the one caregiver still active and licensed to grow there. Chen 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.

In addition, there were other violations noted at the location involving paperwork issues, etc. (See 2024-MCP-1648 regarding all violations noted involving Huang). Huang has been put on a plan of correction with final agency action against him still pending. These violations occurred while Chen, who attested on his caregiver application to understanding the statutes and rules of the MMUCP, was assisting Huang.

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

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

**Registration Revocation and Right to Judicial Review:**

This is a final agency action by the Department. A person aggrieved by a final agency action may file a petition for judicial review in Superior Court within 30 days from receipt of this notice. 5 M.R.S. § 11002; Me.R.Civ.Proc. 80C.

Sincerely,



Elisa C. Ellis, Esq.  
Director of Licensing  
Office of Cannabis Policy