

May 9, 2024

Olde World Remedies, Inc.  
50 Congress Street, Suite 420  
Boston, Massachusetts 02109  
MR282742

Case No. ENF-2022-0000001185

## **FINAL ORDER AND STIPULATED AGREEMENT**

This Final Order and Stipulated Agreement (herein, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (the “Commission”) and Olde World Remedies, Inc. (“Respondent”) (together, the “Parties”) is offered for the purposes of settlement and in lieu of further administrative action. The Commission finds that resolution of this matter serves the purposes of G.L. c. 94G, 935 CMR 500.360, and 935 CMR 500.500 because Respondent has accepted responsibility for the violations set forth in this Order, and further, where Respondent agrees to enhanced Commission oversight for a probationary period.

Accordingly, the Commission and Respondent stipulate to the following facts of record, applicable law, findings, and remedies:

1. The Commission has jurisdiction over the conduct and operations of licensed Marijuana Establishments and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, G.L. c. 94G, and 935 CMR 500.000 *et seq.*;
2. The Commission possesses all powers necessary or convenient to carrying out and effectuating its purposes including conducting investigations of compliance with Commission laws, imposing fines, or otherwise restricting a license for violations of G.L. c. 94G or any regulation promulgated by the Commission;
3. In accordance with its statutory mandate, the Commission has adopted regulations for the administration, clarification, and enforcement of laws regulating and licensing Marijuana Establishments which include:
  - a. Requirements for the information to be furnished by a licensee relating to the licensee’s employees. G.L. c. 94G, § 4(a½)(ix);
  - b. Procedures and grounds for the revocation and suspension of a license or registration. G.L. c. 94G, § 4(a½)(xi);
  - c. Requirements for record keeping by Marijuana Establishments and procedures to track Marijuana cultivated, processed, manufactured, delivered or sold by Marijuana Establishments. G.L. c. 94G, § 4(a½)(xiii);



- d. Minimum standards for the requirement that all licensees possess and operate a...seed-to-sale tracking system sufficient to ensure the appropriate track and trace of all marijuana cultivated, processed or manufactured pursuant to this chapter. *See* G.L. c. 94G, § 4(a½)(xvii); and
  - e. Minimum security requirements for licensees sufficient to deter and prevent theft and unauthorized entrance into areas containing marijuana, which shall include but not be limited to the use of security cameras, provided that the requirements shall not prohibit the cultivation of marijuana outdoors or in greenhouses. G.L. c. 94G, § 4(a ½)(xviii);
4. Pursuant to its authority under G.L. c. 94G §§ 4(a), 4(a½), the Commission may issue a Notice of Fines to show cause as to why a fine or other financial penalty against a Licensee should not be imposed for any acts or omissions determined to be in violation of the state Marijuana laws. *See* 935 CMR 500.360;
  5. Respondent was subject to an investigation by Commission investigators. From that investigation, the Commission alleges violations of Commission regulations, 935 CMR 500.000, relative to Respondent's retail operations at its facility in Lynn, Massachusetts;
  6. On September 11, 2023, the Commission issued a Notice of Fines against Respondent;
  7. On October 6, 2023, Respondent requested an administrative hearing pursuant to 801 CMR 1.01 and 935 CMR 500.500;
  8. On November 2, 2023, Respondent submitted a request for Informal Dispute Resolution, which stayed enforcement proceedings relative to the Notice of Fines;

### **Facts of Record**

9. Respondent is an operational adult-use Marijuana Retailer located at 953 Western Avenue, Lynn, Massachusetts 01905, and is licensed to purchase, sell, or otherwise transfer Marijuana to Marijuana Establishments and to customers under License no. MR282742;
10. Respondent applied for licensure on December 6, 2019;
11. The Commission approved Respondent's provisional retail license on May 7, 2020. On June 17, 2021, the Commission issued Respondent its final license;
12. Respondent commenced retail operations on July 24, 2021;
13. Metrc is the Commission-designated Seed-to-sale System of Record that licensees must use to electronically track the activities of all registered Marijuana Establishment Agents



relative to the cultivation, manufacture, transport, sale and/or delivery of all Marijuana and Marijuana Products under a licensee’s custody and control;

14. On September 18, 2021, Respondent’s Inventory Manager, Ethan Brin (“Brin”), discovered that Metrc Package no. 1A40100001AF6000018609 (herein, “Metrc Package no. 18609”) was short one pre-roll at the close of business. After identifying the discrepancy, Brin reviewed Respondent’s security footage for the day to reconcile the inventory;
15. Footage from Respondent’s security system on September 18, 2021 between 9:38:55 AM and 9:41:06 AM, revealed that one of Respondent’s employees, Devin Burke (“Burke”), sold one ARL Healthcare Nature’s Heritage Wonka Bar 1 gram (g) Pre-Roll Infused w/ Bubble Hash (“Pre-Roll no. 1”) from Metrc Package No. 18609 to a customer, yet Burke also put a second pre-roll from the same Metrc Package (“Pre-Roll no. 2”) into the customer’s bag without charging them;
16. Beginning at 9:39:25 AM, Respondent’s security footage shows Burke picking up Pre-Roll no. 1, scanning it, and setting it down. At 9:39:30 AM, Burke clearly has difficulty scanning Pre-Roll no. 2. After failing to scan Pre-Roll no. 2 multiple times, Burke placed Pre-Roll no. 1 and Pre-Roll no. 2 into a white exit bag and completed the retail transaction. After concluding the transaction, Burke handed the exit bag containing both pre-rolls to the customer;
17. Metrc Receipt no. 0027881995 and Respondent’s Point-of-Sale System Order no. 22859266 confirm the sale of only one pre-roll to the customer on September 18, 2021;
18. After discovering the inventory discrepancy and Burke’s actions, Brin reported the incident to Sedrick Wali (“Wali”), Respondent’s Vice President, on or around September 18, 2021, who responded by reviewing the security footage, scheduling a meeting with Burke, and informing Joel Rothenberg (“Rothenberg”), Respondent’s President, of the incident;
19. Three to four days after the incident, Brin and Wali met with Burke who admitted to giving two pre-rolls to the customer without charging them for both and identified the customer as his father;
20. On September 27, 2021, Brin adjusted Metrc Package no. 18609 by negative 1g—or a single pre-roll—and entered a note in Metrc stating that the adjustment was due to an “entry error”;
21. After receiving a tip about Burke’s distribution of Pre-Roll no. 2, the Investigations and Enforcement department (the “department”) conducted an unannounced inspection at Respondent’s facility on September 30, 2021;



22. At the inspection, Commission investigators interviewed Rothenberg, Wali, and Brin, and asked them to review Respondent’s Standard Operating Procedures (SOPs) for anti-diversion and incident reporting;
23. Respondent’s Prevention of Diversion SOP provides that “employees are required to report known or suspected incidents of...loss by employees and visitors.” These circumstances include “discrepancies in inventories.” The SOP also includes a section with specific steps on how Respondent would respond to loss of Marijuana or Marijuana Products including a requirement that the “Director of Security or designee will immediately notify appropriate law enforcement authorities and the Commission within 24 hours after discovering...discrepancies identified during inventory...”;
24. Respondent’s SOP for Inventory of Marijuana and Marijuana Products (the “Inventory SOP”) requires “all losses, inaccurate or unusual discrepancies in weight found in inventories must be reported to a Manager and an Incident Report is required to be filled out. The Compliance Officer along with the Chief Operating Officer (COO) will investigate any instance of loss, unusual discrepancy in weight or inaccurate inventory. The Compliance Officer or the COO will immediately notify appropriate law enforcement authorities and the Commission within 24 hours after discovering the discrepancies identified during an inventory...”;
25. Respondent’s Required Notifications SOP (the “Notifications SOP”) tracks the language of 935 CMR 500.110(9)(a) and states that “Olde World Remedies CEO or designee will notify the [Commission] and the appropriate law enforcement authorities within 24 hours after discovering the following: a. discovery of inventory discrepancies....” Further, “Olde World Remedies will, within 10 calendar days, provide written notice to the Commission of any incident described [in the preceding paragraph], by submitting an incident report in the form and manner determined by the [Commission]”;
26. During September 2021, Respondent’s Diversion, Inventory, and Notifications SOPs were in effect;
27. After reviewing the SOPs and without identifying any specific incident, Commission investigators asked Rothenberg and Wali if there had been any inventory issues, instances of diversion, or theft they wanted to disclose. Both Rothenberg and Wali answered in the negative;
28. The investigators asked Rothenberg and Wali to review the Commission’s incident reporting regulations and again asked Rothenberg and Wali whether there were any incidents they would like to report but did not point any specific incident that might be the subject of the unannounced inspection. Rothenberg and Wali again said, “no”;
29. Commission investigators asked to see Respondent’s security footage from September 18, 2021, at 9:41 AM. Before watching the footage, the investigators asked whether



Rothenberg and Wali knew why they were being asked about this specific time and date. Rothenberg and Wali responded that they did not;

30. While reviewing the security footage of Burke giving away Pre-Roll no. 2, Rothenberg and Wali identified Burke. The investigators asked if Rothenberg and Wali knew the customer Burke was helping. Rothenberg and Wali both answered “no”;
31. After reviewing the footage, the investigators asked Rothenberg and Wali if they were aware of the incident involving Burke. Wali stated that he was still unsure about what incident they were referring to as the footage showed a customer entering the store and the end of a transaction;
32. At that time, Commission investigators directly confronted Rothenberg and Wali and told them that the Commission classified the incident as an act of diversion. Upon learning that the incident was considered a diversion, Rothenberg and Wali were forthcoming with information. In response, Rothenberg acknowledged that he and Wali knew about the incident and explained that while he was away that day, Wali had been present and had informed him of the issue, but they did not know the incident would be classified as diversion;
33. Wali admitted that he and Brin had met with Burke on or around September 21, 2021, and that Burke told them he had given Pre-Roll no. 2 to his father without charging him. Rothenberg and Wali told the investigators they decided to give Burke another chance because he had tried to scan the product for an extended period of time. Rothenberg and Wali also told investigators that Burke had been under some distress during the transaction because of a personal matter;
34. When asked why they were not forthcoming with information about the incident, Rothenberg and Wali explained that they were unaware that the inventory discrepancy and incident were reportable or would be classified as an act of diversion by the Commission because Brin and Wali had determined where the product had gone, had confirmed the facts of the incident with Burke, issued him notice of probation without terminating his employment;
35. After the inspection, Respondent submitted an incident report to the department and filed a police report with local law enforcement on September 30, 2021;
36. On November 4, 2021, the department issued a Notice of Deficiency to Respondent for failure to maintain real-time inventory, failure to notify the Commission or Law Enforcement Authorities of a reportable incident, and misleading Commission investigators;
37. On November 5, 2021, Respondent submitted a Plan of Correction (POC) to the department. In response to the violation of misleading Commission investigators, Respondent stated that it had misjudged the situation by not viewing it as an act of



diversion and “upon realizing the gravity of the situation...divulged all the information [it] knew”;

### **Applicable Law**

38. Any distribution of Marijuana and Marijuana Products shall be tracked in Metrc. Any distribution of Marijuana and Marijuana Products that is not tracked in Metrc may result in the suspension or revocation of a Marijuana Establishment License or other administrative action. *See* 935 CMR 500.105(8)(g);
39. Metrc is the Seed-to-sale Electronic Tracking System designated by the Commission as the System of Record for Marijuana Establishments. Metrc shall capture everything that happens to an individual Marijuana plant, from seed and cultivation, through growth, harvest and Manufacture of Marijuana Products and Marijuana-infused Products, including transportation, if any, to final sale of finished products. *See* 935 CMR 500.002;
40. A Marijuana Establishment shall notify appropriate Law Enforcement Authorities and the Commission of the discovery of inventory discrepancies immediately and, in no instance, more than 24 hours following discovery of the incident. *See* 935 CMR 500.110(9)(a)1.;
41. A Marijuana Establishment shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a) by submitting an incident report to the Commission. *See* 935 CMR 500.110(9)(b);
42. A Marijuana Establishment shall have and follow a set of detailed written operating procedures. 935 CMR 500.105(1);
43. Operating procedures shall include protocols for security measures in compliance with 935 CMR 500.110 and policies and procedures to ensure accurate recordkeeping, including inventory protocols for Transfer and inventory compliance with 935 CMR 500.105(8) and (9). 935 CMR 500.105(1)(a), (g);
44. Standard operating procedures, or SOPs, are internal documents which are developed by a licensee, submitted to the Commission in the licensee’s application for licensure, and reviewed in connection with the licensing inspection process. SOPs are representations of the protocols the licensee will follow in certain circumstances. *See* 935 CMR 500.101(1)(c)8;
45. Information provided by the Marijuana Establishment that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity, including lack of disclosure or insufficient disclosure, constitutes full and adequate grounds for suspension or revocation of licensure. 935 CMR 500.450(2);



46. The Commission may inspect a Marijuana Establishment at any time without prior notice to determine the Marijuana Establishment's compliance. All areas, activities and records of a Marijuana Establishment and activities and records of Marijuana Establishment Agents are subject to such inspection. Submission of an application by or issuance of a License to a Marijuana Establishment constitutes consent for such inspection. *See* 935 CMR 500.301(1);
47. During the course of an investigation or inspection, a Marijuana Establishment shall immediately on request make available to the Commission all information that may be relevant to an inspection or investigation of an incident or a complaint. *See* 935 CMR 500.301(3);
48. The failure to cooperate with an inspection may result in administrative or disciplinary action against the Licensee. 935 CMR 500.301(7);

### **Stipulated Findings**

49. The Commission, through its Acting Executive Director, and Respondent have come to mutual agreement and understanding, and jointly propose to the Commission a resolution of the alleged violations in lieu of proceeding with an administrative hearing to determine the merits of such allegations. The terms and conditions of this Order are expressly subject to ratification by the full Commission. Pursuant to G.L. c. 10, § 76, three Commissioners shall constitute a quorum and the affirmative vote of three Commissioners shall be required for ratification of this Order;
50. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent agrees to the stipulated findings set forth in Paragraphs 51–54, inclusive of all subparagraphs;
51. Respondent failed to track the distribution of Marijuana and Marijuana Products in Metrc in violation of 935 CMR 500.105(8)(g);
  - a. On September 18, 2021, Burke took two pre-rolls from Metrc Package no. 18609, recorded the sale of only Pre-Roll no. 1, but put both Pre-Roll no. 1 and Pre-Roll no. 2 into the customer's bag without charging the customer for Pre-Roll no. 2 due to his inability after many efforts to properly scan the product;
  - b. Burke is a registered Agent with Respondent, making Respondent liable for his conduct;
  - c. As a result of Burke's actions, there was no record in Respondent's virtual inventory for Metrc Package no. 18609 for the distribution of Pre-Roll no. 2 at the end of the day;
  - d. On September 27, 2021, Brin adjusted Metrc Package no. 18609 by negative 1g— or a single pre-roll—to correct the discrepancy between Respondent's physical inventory and its virtual inventory;



52. Respondent failed to notify Law Enforcement Authorities and the Commission of the discovery of an inventory discrepancy within 24 hours and did not submit an incident report to the Commission within ten calendar days in violation of 935 CMR 500.110(9)(a)1. and (b):
- a. On September 18, 2021, Brin discovered a discrepancy in Respondent's virtual inventory for Metrc Package no. 18609 and learned that Burke was the cause of the discrepancy;
  - b. Brin reported the inventory discrepancy and Burke's actions to Wali who reviewed the security footage, scheduled a meeting with Burke, and informed Rothenberg of the incident;
  - c. While *de minimis* inventory discrepancies are a reality for the industry, with adjustments made on a frequent basis, licensees are required to notify the Commission of reportable incidents including, but not limited to, inventory discrepancies. Rothenberg and Wali failed to understand the inventory discrepancy as a reportable incident and therefore did not notify Law Enforcement Authorities or the Commission of the incident or submit an incident report until September 30, 2021;
53. Respondent failed to follow its Diversion, Inventory, and Notifications SOPs violating 935 CMR 500.105(1)(a) and (g):
- a. On September 18, 2021, Brin discovered a discrepancy in Respondent's virtual inventory for Metrc Package no. 18609 and learned that Burke was the cause of the discrepancy;
  - b. Brin reported the inventory discrepancy and Burke's actions to Wali who reviewed the surveillance footage, scheduled a meeting with Burke, and informed Rothenberg of the incident;
  - c. Respondent's SOPs for Inventory, Diversion, and Notifications required Respondent and its various staff, including its COO, Compliance Officer, and Director of Security to notify the Commission of inventory discrepancies within 24 hours after discovery;
  - d. Respondent's Notifications SOP also prescribed that Respondent would provide written notice to the Commission of any inventory discrepancies within 10 calendar days by submitting an incident report;
  - e. Respondent did not notify the Commission or Law Enforcement Authorities within 24 hours of discovery of the inventory discrepancy for Metrc Package no. 18609;
  - f. Respondent did not submit an incident report to the Commission within 10 days after discovery of the inventory discrepancy for Metrc Package no. 18609;
54. Respondent misled Commission investigators during an investigation and made a false record entry in Metrc in violation of 935 CMR 500.450(2):
- a. On September 18, 2021, Brin discovered a discrepancy in Respondent's inventory for Metrc Package no. 18609, reviewed footage from Respondent's security system, learned that the discrepancy was attributable to Burke's actions;





- b. Brin reported his findings to Wali who reviewed the security footage himself, scheduled a meeting with Burke, and informed Rothenberg of the incident;
- c. At a meeting with Brin and Wali on or around September 21, 2021, Burke admitted that he had failed to scan Pre-Roll no. 2 and in a moment of indecision gave it to the customer;
- d. Burke notified Brin and Wali that the customer was his father;
- e. On September 27, 2021, Brin adjusted Respondent's virtual inventory for Metrc Package no. 18609 to account for the discrepancy between Respondent's virtual and physical inventory caused by Burke;
- f. While *de minimus* inventory discrepancies are a reality for the industry, with adjustments made on a frequent basis, licensees are required to make accurate and truthful reporting in Metrc. Brin entered a note in Metrc falsely attributing the inventory discrepancy as an "entry error";
- g. Brin is a registered Agent for Respondent making Respondent liable for his conduct;
- h. Twelve days after Respondent discovered the inventory discrepancy and Burke's actions, nine days after Brin and Wali met with Burke, and three days after Brin adjusted Respondent's inventory, on September 30, 2021, Commission investigators asked Wali, Rothenberg, and Brin multiple times about their knowledge of the inventory discrepancy and Burke's actions on September 18, 2021;
- i. Rothenberg and Wali were not forthcoming in their responses to Commission investigators despite their knowledge of Burke's actions, because they were unaware that the incident was reportable to the Commission and an act of diversion;
- j. It appears that Wali was not forthcoming with Commission investigators about his knowledge of the incident due to his belief that the incident was not reportable or an act of diversion. Wali fully admitted he was informed of the incident on September 18, 2021, by Brin and had met with Burke on September 21, 2021, to discuss the same. Wali contends that it never occurred to him that this was a diversion;
- k. Rothenberg and Wali disclosed their knowledge of the inventory discrepancy and Burke's actions only after Commission investigators made clear the purpose for their visit and that they already knew about Burke's distribution of Pre-Roll no. 2 on September 18, 2021;
- l. In its POC dated November 5, 2021, Respondent explained that it had misjudged the situation for not viewing it as an act of diversion and "upon realizing the gravity of the situation...divulged all the information [it] knew";
- m. Rothenberg and Wali are registered Agents and Managers for Respondent, making Respondent liable for their conduct;

### **Stipulated Remedy**



55. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent further agrees to the stipulated remedies and terms set forth in Paragraphs 56–76, inclusive of all subparagraphs;

56. Respondent agrees to pay a monetary fine in the amount of sixty thousand dollars (\$60,000.00), made payable by check or money order to the Cannabis Control Commission Marijuana Regulation Fund;

a. Payment shall consist of installments due and payable pursuant to the following schedule:

<b>Amount</b>	<b>Due Date</b>
\$18,000.00	No later than one (1) year from the date of ratification of this Order by the Commission.
\$21,000.00	No later than two (2) years from the date of ratification of this Order by the Commission.
\$21,000.00	No later than three (3) years from the date of ratification of this Order by the Commission.

b. Nothing in this Order shall prohibit Respondent from submitting payments in advance of the due date, or in installments less than the amount due but no less than \$500.00 increments, provided that the required amounts are paid in full by the due dates listed above;

57. Payments shall be mailed to the following address:

a. Via USPS:

Cannabis Control Commission  
PO Box 412144  
Boston, MA 02241-2144

b. Via Courier/Overnight:

Bank of America Lockbox Services  
Cannabis Control Commission 412144  
MA5-527-02-07  
2 Morrissey Boulevard  
Dorchester, MA 02125

58. Respondent shall submit to a six-month probationary period (the “probationary period”) for license no. MR282742 which will take effect on the date this Order is ratified:

a. Any substantial noncompliance with any Commission laws by Respondent during the probationary period shall constitute full and adequate grounds for license suspension or revocation;

b. Prior to enforcing this provision, the department agrees to send Respondent a Letter of Warning giving notice of the alleged substantial noncompliance and providing an opportunity for Respondent to correct the deficiencies;



59. During the probationary period, Respondent shall conduct an audit of all the Marijuana and Marijuana Products at its facility twice per month, for a total of twelve (12) inventory audits. Each month, the first audit is due to the department on the 15<sup>th</sup> of the month and the second is due on the last day of the month. This requirement is in addition to Respondent's obligations under 935 CMR 500.105(8);
60. Respondent shall participate in the following continuing education before the end of the probationary period and must provide a certificate or other documentation demonstrating completion of each course to the department within five days of completion unless such training has been completed within the past 20 days, in which case certification shall be provided to the department:
- a. Respondent's Owners and Management shall undergo ethics training. Respondent shall provide the curriculum to the department for approval prior to engaging in the training;
  - b. All Respondent's staff, including Management staff, shall submit to a refresher training on: (1) inventory, (2) recordkeeping, and (3) reporting obligations to the Commission. Respondent shall provide a curriculum to the department for approval prior to engaging in the training;
  - c. All Respondent's staff, including Management staff, shall complete the Basic Core Curriculum for Responsible Vendor Training before the end of the probationary period;
  - d. All Respondent's staff, including Management staff, shall take and complete the following courses: (1) the Massachusetts Metrc New Business Training; (2) the Metrc Learn training courses for Sales Journey Levels 1, 2, and 3; and (3) the Massachusetts Advanced Retailer Webinar;
61. Respondent's failure to comply with its audit or training obligations under Paragraphs 59–60 during the probationary period shall result in an automatic penalty assessment of one thousand dollars (\$1,000.00) per defaulted obligation. Respondent understands that it will not be afforded a hearing right to challenge the automatic fine assessment. Upon receiving a demand for payment from the Commission, Respondent shall provide such payment by check or money order payable to the Cannabis Control Commission Marijuana Regulation Fund within 30 days. Payment for penalties assessed against the Respondent under this clause shall be mailed to one of the addresses listed in Paragraph 57;
62. This Order may be admissible as evidence in any future hearing before the Commission or used in connection with any future licensure or administrative actions by the Commission;
63. Any issues relating to the underlying complaint and investigation that formed the basis for this Order against Respondent (and any defenses that Respondent may have to such complaint or investigation) shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Order;




64. Respondent agrees that the Commission may consider the Order and the facts and circumstances described therein in connection with review of an application for licensure, renewal of licensure, or suitability review;
65. Respondent acknowledges advisement of hearing rights and process of the proceedings and wishes to resolve all issues which were the subject of the investigation or in any way related to the investigation by entering into this Order;
66. If approved by the Commission and upon execution of all parties, this Order shall have the same force and effect as an order entered after formal hearing pursuant to 935 CMR 500.500(12), except that it may not be appealed. Failure to comply with the terms of this Order, including but not limited to failure to make a timely payment in accordance with Paragraph 56, may constitute the basis for further administrative action against Respondent;
67. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of their choosing and Respondent represents that they have had an opportunity to do so prior to signing the Order. Respondent acknowledges that they have been given a reasonable period of time in which to consider the terms of this Order before signing it. Respondent acknowledges and confirms that they have entered into this Order voluntarily and of their own free will, without duress or coercion, and that they are competent to enter into this Order. Respondent acknowledges that they have carefully read and fully understand the meaning and intent of this Order;
68. Respondent further understands and knowingly and voluntarily waives the following rights:
  - a. The right to proceed with Respondent's hearing request submitted on October 6, 2023;
  - b. The right to cross-examine witnesses, subpoena witnesses, present evidence and testify on Respondent's own behalf at that hearing;
  - c. The right to appeal this Order;
69. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this Order pursuant to G.L. c. 30A, § 14;
70. Upon execution by all parties, this Order shall represent the entire and final agreement of the parties. In the event that any provision of this Order is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of the Order shall be given full force and effect;
71. This Order shall be binding upon Respondent and shall inure to the benefit of the parties to this Order and their respective successors and assignees and shall be construed in accordance with and governed by the laws of the Commonwealth of Massachusetts;



- 72. Upon ratification of this Order by the Commission, this Order shall become a permanent part of Respondent's record and shall be open to public inspection and disclosure pursuant to the Commission's standard policies and procedures or applicable law;
- 73. The Commission may reject the terms of this Order or otherwise deny ratification and entry of the Order. In such event, the terms of the Order shall be null and void, including but not limited to Respondent's admissions, and the parties will proceed to hearing;
- 74. This Order may be executed by e-mail and any signature delivered by either email or first-class mail shall be deemed to be as valid as an original signature;
- 75. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission; and
- 76. For purposes of addressing any future violations of the Order, the Commission regulations, 935 CMR 500.000, *et seq.*, shall include all later adopted regulations that are in effect at the time of the subsequent violation.

This Order is subject to ratification by the Commission. Upon ratification, this Order becomes binding on the Parties. Failure to comply with the above conditions may result in administrative action against Respondent up to and including suspension and/or revocation of registration.


**Commonwealth of Massachusetts Cannabis Control Commission**

  
 \_\_\_\_\_  
 Debra Hilton Creek, Acting Executive Director

5/9/2024  
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 Date Signed

Ratified by Commission vote (  yes,  no,  abstain) on May 9, 2024.

**Respondent Olde World Remedies, Inc.**

  
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 Olde World Remedies, Inc.

04/26/24  
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 Date Signed