



August 14, 2025

Assured Testing Laboratories, LLC  
300 Potash Hill Road, Suite A  
Tyngsborough, Massachusetts 01879  
License No. IL281360

Case No. ENF-2025-0000001858

### **FINAL ORDER AND STIPULATED AGREEMENT**

This Final Order and Stipulated Agreement (herein, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (the “Commission”) and Assured Testing Laboratories, LLC (herein, “Respondent”) (together, the “Parties”) is offered in lieu of further administrative action for the purposes of settlement to resolve the Summary Suspension Order issued on June 30, 2025, and any other enforcement action the Commission might have pursued or is pursuing regarding Respondent’s actions known or could have reasonably been known to the Commission through the date of this Order. The Commission finds that the resolution of this matter serves the purposes of G.L. c. 94G, G.L. c. 94I, 935 CMR 500.000 and 501.000 because Respondent has cooperated with the Commission’s investigation and with the Commission during the period of summary suspension and has agreed to enhanced Commission oversight for an interim period to avoid any potential risk to the public health, safety, or welfare and as evidence of its ongoing commitment to legal compliance.

Accordingly, the parties stipulate to the following Facts of Record and Applicable Law, as presented by the Commission, but Respondent neither admits nor denies the Commission’s findings, which are contained in Paragraphs 59 through 63. Respondent enters into this Order solely for the purposes of settlement, which shall neither be considered an admission of liability nor a violation of law. Respondent has voluntarily agreed to the stipulated remedy, contained in Paragraphs 65 through 89 and following the ratification of this Order by majority vote of the Commission, this Order is binding on the Parties for the purpose of bringing this matter to a final resolution.

### **Legislative, Statutory, and Regulatory Authority**

1. The Commission has jurisdiction over the conduct and operations of licensed Independent Testing Laboratories and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, G.L. c. 94I, G.L. c. 94G, 935 CMR 500.000 *et seq.*, and 935 CMR 501.000 *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. 94I, G.L. c. 94G, or any regulation promulgated by the Commission;
3. In accordance with its statutory mandate, the Commission has adopted regulations and protocols for the oversight of Independent Testing Laboratories and the Marijuana testing process, that include:
  - a. The establishment of a testing protocols for the sampling, testing and analysis of marijuana, finished marijuana and marijuana products...to address sampling and analysis to characterize the cannabinoid profile and biological and chemical contaminants, including but not limited to terpenoids, pesticides, plant growth regulators, metals, microbiological contaminants, mycotoxins, and residual solvents. *See* G.L. c. 94G, § 15(a)(1); and
  - b. The obligation to report any results indicating contamination to the Commission within 72 hours of identification. *See* G.L. c. 94G, § 15(a)(3);
4. Pursuant to its authority under G.L. c. 94G §§ 4(a), 4(a½), and 935 CMR 500.350, the Commission may issue a Summary Suspension Order that requires the immediate suspension of a License and its associated registrations and cessation of all operations, if based on inspection, affidavits, or other credible evidence, the Commission or Commission Delegee determines that a Licensee or Registrant poses an immediate or serious threat to the public health, safety or welfare. *See* 935 CMR 500.350(2)(b);

#### **Facts of Record**

5. Respondent was subject to an investigation by Commission investigators. From that investigation, the Commission alleged violations of Commission law, relative to Respondent's obligations as a licensed Independent Testing Laboratory;
6. On June 30, 2025, the Commission issued a Summary Suspension Order to Respondent pursuant to 935 CMR 500.350 ordering the suspension and cessation of all operations effective July 4, 2025;
7. Respondent is a licensed Independent Testing Laboratory located at 300 Potash Hill Road, Suite A, in Tyngsborough, Massachusetts 01879;
8. The Commission issued Respondent its Final License on October 13, 2022;
9. According to the Massachusetts Cannabis Industry Portal, Dimitrios Pelekoudas ("Dr. Pelekoudas") is listed as a Person Having Direct or Indirect Authority with 37.97% ownership and control interest over Respondent's License;
10. After receiving Commission authorization, Respondent commenced operations on February 16, 2023;

11. Respondent is accredited in accordance with International Organization for Standardization (ISO)/International Electrotechnical Commission (IEC) 17025:2017 by Perry Johnson Laboratory Accreditation, Inc.;
12. Respondent is authorized and accredited to carry out testing on Marijuana and Marijuana Products (collectively, “Marijuana”) including, but not limited to, tests for microbials, potency, heavy metals, pesticides, and mycotoxins;
13. Respondent’s current ISO/IEC 17025:2017 accreditation expires on February 24, 2027;
14. The Investigations and Enforcement department (the “department”) conducted audits of testing data input into the Seed-to-sale Electronic Tracking System (herein, “Metrc”) to identify trends in testing data;
15. According to Metrc data, in 2024, Respondent analyzed 12,609 Marijuana lab samples for the presence of Total Yeast and Mold and, throughout that time, reported that only 8 test samples failed for the presence of Total Yeast and Mold contamination over the Commission’s limit;
16. On July 18, 2024, the department conducted an announced inspection to review and audit Respondent’s microbiology testing protocols;
17. On March 27, 2025, the department conducted an unannounced inspection at Respondent’s facility and spoke with Laboratory Agents employed by Respondent including its Director of Sales, Laboratory Director, and various Laboratory Technicians;
18. Following the inspection, department staff continued investigative efforts by interviewing other Laboratory Agents employed by Respondent regarding its general operational processes and testing processes related to Total Yeast and Mold;
19. On April 16, 2025, the department issued a Notice of Deficiency (NOD) to Respondent identifying violations related to its standard operating procedures (SOPs);
20. On the same day, the department sent a Request for Information (RFI) to Respondent seeking, among other things, raw data outputs from testing instruments and data input into its laboratory information management system (LIMS) for the period of April 1, 2024, to April 15, 2025;
21. On May 1, 2025, Respondent provided a Plan of Correction in response to the NOD;
22. From April 24, 2025, to May 28, 2025, Respondent cooperated with the department’s RFI and follow-up requests by providing the information requested, including the data sought;
23. The department aggregated, reviewed, and compared the data provided by Respondent to the information Respondent input into Metrc;

24. On June 30, 2025, the department conducted another unannounced inspection at Respondent's facility and interviewed other Laboratory Agents;
25. Following the issuance of the Summary Suspension Order on June 30, 2025, the department continued its investigation by conducting additional interviews of Laboratory Agent's employed by Respondent and issuing a second RFI to Respondent on July 8, 2025;
26. On July 15, 2025, and July 31, 2025, Respondent provided partial responses to the second RFI and notified the department that additional responsive material will be provided on an ongoing basis;
27. According to data from Respondent's LIMS, from April 1, 2024, to April 15, 2025, Respondent processed 22,531 Marijuana laboratory samples from 61 different Licensees;
28. Of the 22,531 lab samples processed during this period, Respondent conducted microbial panel testing on 18,246 lab samples;
29. During that same timeframe, Assured reported in Metrc that only 0.05% of lab samples for raw plant material it tested for Total Yeast and Mold—10 out of 17,709 lab samples—failed due to contamination results exceeding the regulatory limit;
30. According to the instrumentation data provided by Respondent, from April 1, 2024, to April 15, 2025, 7,183 lab samples it analyzed had microbial panels that produced a numerical value for Total Yeast and Mold that was above zero and under 10,000 CFU/g;
31. Respondent reported each of those 7,183 results in Metrc as zero. On related certificates of analysis provided to clients, Respondent reported said results as non-detect or below the limit of detection set by Respondent as 10,000 CFU/g or 1,000 CFU/g, as applicable;
32. In accordance with Section 3.3 of Respondent's SOP titled Data Reporting, Doc. No. P-042 (herein, "Data Reporting SOP"), "the results of each test or series of tests carried out...shall be reported accurately, clearly, unambiguously, and objectively, and in accordance with applicable procedures incorporated in its manuals" and are reviewed and signed by the Quality Manager or their designee once completed;
33. The individuals working for Respondent that sign Certificates of Analyses, verifying and attesting to the accuracy and the information presented, are the Quality Manager(s) as well as the Owner and Chief Executive Officer Dr. Pelekoudas;
34. 544 lab samples tested by Respondent from April 1, 2024, to April 15, 2025, had at least one initial microbial panel that indicated a Total Yeast and Mold value of over 10,000 CFU/g;

35. The Commission's threshold for Total Yeast and Mold contamination in unprocessed and processed plant material is 10,000 CFU/g, *i.e.*, Total Yeast and Mold contamination at or above 10,000 CFU/g is a failing result;
36. 160 lab samples tested by Respondent from April 1, 2024, to April 15, 2025, had at least two failing results;
37. Respondent's SOP titled Internal Validation, Doc. No. P-048 (herein, "Internal Validation SOP"), implemented February 3, 2023, addressed processes for samples with failing results;
38. Section 3.0 of the Internal Validation SOP defined the following three terms:
  - a. Internal Validation: The internal process initiated when test data suggests a sample may exceed CCC-established failure limits. Internal validation involves additional sample preparation, analysis, and/or data review to verify the accuracy of the initial result;
  - b. Potential failure: An initial analytical result indicating that a sample may not comply with CCC regulatory thresholds. This applies to analysis of microbial and heavy metal samples; and
  - c. Inconsistent data: Data that does not follow trend from previous samples of the same sample type and customer. This applies to cannabinoid and terpene samples;
39. Sections 4.0 and 5.0 of the Internal Validation SOP outlined the responsibilities for Respondent's Laboratory Technicians, Client Services, Analytical Staff and Quality Assurance personnel, and included steps to identify and document failures, reanalyze failing material if additional sample material was available, contact and inform clients of a failing test results, request new sample material, perform testing and analysis of that new material, and report the results of those new tests in Metrc rather than the original tests;
40. The Commission issued an Administrative Order Requiring Licensees to Submit One Full Panel Test Samples for Required Compliance Testing ("Administrative Order No. 4"), which provided further instruction to operators directly related to its regulations regarding independent laboratory testing policies and procedures, Respondent revised its policies and procedures to comply with the regulations as clarified;
41. Effective as of April 1, 2025, and as a result of Administrative Order No. 4, Respondent updated its Internal Validation SOP in an effort to ensure compliance with Administrative Order No. 4, issued December 17, 2024, amended March 13, 2025, effective April 1, 2025, and included a notation that "the internal validation method described in this SOP is no longer viable when additional material cannot be tied to the original sample tag";
42. Prior to the Commission's RFI on April 16, 2025, Respondent did not provide or notify the Commission of the existence of the Internal Validation SOP despite regulatory obligations to provide the Commission with updates to its licensing application materials

and a request on May 17, 2024, for “a comprehensive list of all SOPs and policies utilized by Assured Testing Labs”, to which Respondent claims it inadvertently responded with an outdated list of SOPs and policies;

43. From April 1, 2024, to April 15, 2025, neither Respondent nor its clients reported the results for the 544 failing lab samples, inclusive of the 160 lab samples that received multiple failing test results, to the Commission within 72 hours of identification. Rather, the Total Yeast and Mold failures were either omitted or input as zero or “not tested” in Metrc;
44. From April 1, 2024, to April 15, 2025, Respondent’s practice of reporting test results as zero or non-detect extended to other component tests, including aerobic and bile-tolerant gram-negative bacteria, heavy metals, and potency;
45. Further, during June 2024 and between December 2024 to February 2025, Respondent reported pesticide and mycotoxin results in Metrc as “passed” before testing was complete. In connection with its response to an RFI issued by the Commission on July 8, 2025, Respondent performed an in-depth audit of its internal data, which led to the discovery, and disclosure, of these data reporting inconsistencies;
46. As of the date of this Order, there is no indication that any lab samples Respondent tested after being initially reported as passing have failed for the presence of pesticides or mycotoxins;

#### Applicable Law

47. An Independent Testing Laboratory shall report any results indicating contamination to the Commission within 72 hours of identification. G.L. c. 94G, § 15(a)(3);
48. The Commission has established contamination limits for heavy metals, pesticides, and microbials in Exhibits 4 through 6 of its Protocol for the Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers, and Colocated Marijuana Operations;
49. Acceptance of a provisional or final license constitutes an agreement by the Licensee that it will adhere to the practices, policies, and procedures that are described in its application materials, as well as all relevant laws, regulations, and any conditions imposed by the Commission as part of licensure. *See* 935 CMR 500.103(2)(d);
50. Every Marijuana Establishment shall have and follow a set of detailed written operating procedures. *See* 935 CMR 500.105(1) and 501.105(1);
51. A Marijuana Establishment shall have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1)...the notifications shall be from both the

Marijuana Establishment and the Independent Testing Laboratory, separately and directly. *See* 935 CMR 500.160(4)(b) and 501.160(4)(b);

52. A Licensee that receives notice that Marijuana or a Marijuana Product it has submitted for testing has failed any test for contaminants shall either reanalyze the Marijuana or Marijuana Product without remediation, take steps to remediate the identified contaminants, or dispose of the Marijuana or Marijuana Product. *See* 935 CMR 500.160(13) and 501.160(13);
53. If the Licensee chooses to reanalyze the sample, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, a sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample shall have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test may not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, the Marijuana Establishment shall dispose of any such product. 935 CMR 500.160(13)(a) and 501.160(13)(a);
54. Information provided by a 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 suspending or revoking a license. *See* 935 CMR 500.450(2) and 501.450(2);
55. Marijuana Establishments failing to comply with any requirement of...G.L. c. 94G, 935 CMR 500.000 or 501.000...constitutes full and adequate grounds for suspending or revoking a license. *See* 935 CMR 500.450(3) and 501.450(3);
56. Conduct or practices of a Marijuana Establishment that are detrimental to the safety, health, or welfare of the public constitute full and adequate grounds for suspending or revoking a license. *See* 935 CMR 500.450(15) and 501.450(15);

### **Stipulated Findings**

57. The Commission, through its 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;
58. Respondent neither admits nor denies the findings set forth in Paragraphs 59 through 63, inclusive of all subparagraphs;

59. From April 1, 2024, to April 15, 2025, Respondent did not report certain test results for Marijuana lab samples indicating contamination to the Commission in violation of G.L. c. 94G, § 15(a)(3), 935 CMR 500.160(4)(b) and 501.160(4)(b):
- Respondent did not report the actual results of 7,183 Marijuana lab samples that had microbial panels that produced a numerical value for Total Yeast and Mold that was above zero and under 10,000 CFU/g;
  - Respondent did not report the failing results of 544 Marijuana lab samples that had microbial panels indicating a Total Yeast and Mold value of over 10,000 CFU/g;
  - Respondent did not report the failing microbial results for at least one Marijuana lab sample that produced numerical values for total viable aerobic bacteria that was above 100,000 CFU/g
  - Respondent did not report the failing microbial results for at least one Marijuana lab sample that produced numerical values for bile-tolerant gram-negative bacteria that was above 1,000 CFU/g; and
  - Respondent did not report the failing heavy metal result for at least one Marijuana lab sample that produced a numerical value for Arsenic that was above 200 ppb;
60. From April 1, 2024, to April 15, 2025, Respondent reported testing results of Marijuana lab samples to the Commission in violation of 935 CMR 500.450(2) and 501.450(2):
- Respondent reported the Total Yeast and Mold results of 7,183 Marijuana lab samples as zero rather than the numerical value measured;
  - A result of zero indicate to the Commission that there is no presence of Total Yeast and Mold contamination;
  - Respondent reported the failing Total Yeast and Mold results of 544 Marijuana lab samples with at least one failing result, and 160 Marijuana lab samples with at least two failing results, as zero or “not-tested”;
  - Respondent omitted failing microbial results for at least one Marijuana lab sample;
  - Respondent omitted failing heavy metal results for at least one Marijuana lab sample; and
  - Respondent reported that Marijuana lab samples passed pesticide and mycotoxin testing before actually completing said testing;
61. Between 2023 and 2025, Respondent implemented and followed a SOP that was incompatible with G.L. c. 94G, § 15(a)(3), 935 CMR 500.160(4)(b) and 501.160(4)(b) and the reanalysis process outlined in 935 CMR 500.160(13)(a) and 501.160(13)(a) in violation of 935 CMR 500.450(3) and 501.450(3):
- On February 3, 2023, Respondent implemented the Internal Validation SOP;
  - Respondent did not notify or provide the Internal Validation SOP to the Commission until April 16, 2025;
  - The Internal Validation SOP established a process where Respondent would coordinate with clients regarding failing test results without reporting the same to the Commission or in Metrc as required by G.L. c. 94G, § 15(a)(3), 935 CMR 500.160(4)(b) and 501.160(4)(b);

- d. If additional sample material was available, Respondent would reanalyze failing samples without reporting the initial failure to the Commission;
  - e. If additional sample material was not available, Respondent would ask its client to submit another sample from the same source package without reporting the initial failure to the Commission;
  - f. Respondent would only report the passing results from reanalysis or the new sample;
  - g. As a result of this coordination, clients did not submit another sample to a second Independent Testing Laboratory for a “Second Confirmatory Test” as required by Commission regulations; and
  - h. From April 1, 2024, to April 15, 2025, Respondent’s process enabled clients to avoid the Commission’s established reanalysis process under 935 CMR 500.160(13)(a) and 501.160(13)(a) for at least 544 Marijuana lab samples;
62. Respondent’s practices and actions described in Paragraphs 27 to 46 undermined the Commission’s ability to ensure compliant testing of Marijuana and were detrimental to the public health, safety, and welfare in violation of 935 CMR 500.450(15) and 501.450(15);
63. Since the Commission’s issuance of the Summary Suspension Order on June 30, 2025, effective July 4, 2025, Respondent has complied with the obligations of the Summary Suspension Order, and cooperated with Commission staff and requests;

**Stipulated Remedy**

64. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent agrees to the stipulated remedies and terms set forth in Paragraphs 65 through 89, inclusive of all subparagraphs;
65. Respondent agrees to pay a monetary fine in the amount of three-hundred thousand dollars (\$300,000.00) by check or money order and made payable to the order of the Cannabis Control Commission Marijuana Regulation Fund;
- a. Payment shall consist of the following installments due and payable in accordance with the following schedule:

Amount	Due Date
\$100,000.00	60 days after ratification of this Order by the Commission
\$100,000.00	120 days after ratification of this Order by the Commission
\$100,000.00	180 days after ratification of this Order by the Commission

66. Payment shall be postmarked on or before the due dates identified in Paragraph 65.a. and 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

67. In addition to the monetary penalty identified in Paragraph 65, Dr. Pelekoudas' Agent Registration shall be suspended for a period of 12-months beginning on the date Respondent appoints an interim or permanent Chief Executive Officer, who shall be registered in accordance with Commission regulations, which in no case shall be later than 90 days after Respondent's license suspension is lifted, in accordance with Paragraph 69. During his suspension, Dr. Pelekoudas shall not serve as the Chief Executive Officer or otherwise retain any decision-making capacity or authority with Respondent;

- a. The interim Chief Executive Officer shall not be a relative within the fourth degree of consanguinity of Dr. Pelekoudas or his spouse or domestic partner, as applicable; and  
b. Respondent shall provide the Commission with the curriculum vitae for the appointed interim or permanent Chief Executive Officer;

68. Effective immediately, Respondent shall cease all alleged noncompliant operations described in the Summary Suspension Order issued on June 30, 2025, effective July 4, 2025, and this Order;

69. The Summary Suspension Order issued by the Commission on June 30, 2025, and effective on July 4, 2025, shall be rescinded on September 15, 2025, subject to the following conditions; provided, however, that the Summary Suspension Order may be rescinded on or after August 21, 2025, in the Commission's discretion if the following conditions are completed earlier by Respondent, which shall be deemed met if not denied within two (2) weeks of submission to the Commission:

- a. Respondent shall contract with an independent auditor:  
i. Said independent auditor shall be responsible for reviewing and reporting on Respondent's raw testing data and ensuring that said data is accurately reported in Metrc;  
ii. Said independent auditor shall provide quarterly reports detailing its review and any findings to the Commission during the probationary period. The first report shall be provided to the Commission in January 2026, for the period of September 2025 through December 2025, and continue thereafter on a quarterly basis for a total of 8 reports;  
iii. Said independent auditor shall be approved by the Commission prior to being contracted by Respondent;

1. As applicable, Respondent shall provide the curriculum vitae, auditing credentials and whether there are any existing contracts between Respondent and the auditor;
    2. Respondent shall provide the Commission with the agreement entered into between Respondent and the auditor;
  - b. Respondent shall submit revised SOPs to the Commission and provide a list of all SOPs currently in use or effect:
    - i. Respondent shall provide changes to SOPs to the Commission with changes in redline;
    - ii. Respondent shall develop or revise an existing SOP to incorporate sample retention procedures that contain at a minimum the following:
      1. Requiring a test sample sufficient to accommodate the Commission's authority to direct further testing pursuant to 935 CMR 500.160(3) and 501.160(3); and
      2. Requirement that Respondent retain lab samples for 14 days, in conditions typically used for lab sample storage, or a maximum excess storage of 800 samples in addition to samples actively being processed, whichever ensures longer retention, after reporting testing results in Metrc. If Respondent must destroy samples due to storage capacity, Respondent shall provide the Commission at least 48 hours' notice before destruction;
  - c. Respondent shall provide the Commission with a job description for the Quality Control Manager, who shall be hired pursuant to Paragraph 70, as well as a description of where the Quality Control Manager is identified in Respondent's corporate structure, inclusive of all employees to which the Quality Control Manager shall report;
  - d. Respondent shall notify the Commission of any personnel changes effectuated prior to the removal of the suspension, inclusive of the appointment of an interim Chief Executive Officer and any other executive- or management-level agents;
  - e. Respondent shall provide the Commission with a detail description of the process through which it will deliver regular reports of failed testing results to the Commission pursuant to Paragraph 72;
70. Within 90 days of the ratification of this Order, hire a Quality Control Manager and notify the Commission of said hiring, which time period may be extended as reasonably necessary, subject to Commission approval, such approval not to be unreasonably withheld;
71. Respondent shall submit to a two-year probationary period (the "probationary period"), which shall take effect when the suspension is lifted pursuant to Paragraph 69. During the probationary period:
  - a. Any substantial noncompliance with this Order or any Commission laws by Respondent or any Person Having Direct or Indirect Control of Respondent shall constitute full and adequate grounds for further administrative or disciplinary action, up to and including revocation of the License;

- b. Prior to enforcing this provision, the Commission agrees to notify Respondent of said violation(s) via a Letter of Warning, which shall identify the violation(s) and provide Respondent with a reasonable time to correct the identified violation(s);
72. During the probationary period, Respondent agrees to deliver bi-weekly reports of failed lab samples to the Commission, including the number of tests performed, the number of failing results received, and the number of failures as a percentage of the total number of tests it has performed during the reporting period; provided, however, that the Commission may reduce the frequency of reports during this period at its discretion upon 2-week notice to Respondent. This requirement shall not relieve Respondent from its general reporting obligations in accordance with applicable statutes and regulations;
73. Within 90 days of the ratification of this Order, Respondent shall ensure that applicable staff enrolls in the following continuing education and submit documentation demonstrating the completion of each course within 5 days of each staff member's completion of said course:
  - a. Respondent's executive-level and management staff responsible for implementing any quality control processes shall complete ISO Auditor competency training, 200V: Internal Auditor for ISO/IEC 17025:2017 – T224-22; and
  - b. All Respondent's agents shall complete ethics training. Prior to enrolling in said ethics training, Respondent shall provide the Commission with a syllabus and/or course description of the training for approval by the Commission;
74. 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;
75. 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;
76. Respondent agrees that the Commission may consider this Order and the facts and circumstances described therein in connection with review of an application for licensure, renewal of licensure, or suitability review;
77. Respondent enters into this Order solely for the purposes of settlement. This Order shall neither be considered an admission of liability nor a violation of law for any purpose, nor as evidence supporting the allegations of the Commission;
78. By entering into this Order, Respondent acknowledges that it has been advised of its right to a hearing and nonetheless wishes to resolve all issues that were the subject of this investigation or in any way related to this investigation and Order;
79. 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 a hearing conducted in accordance

with G.L. c. 30A pursuant to 935 CMR 500.500(12) and 501.500(12), except that this Order 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 65, shall constitute the basis for further administrative action against Respondent;

80. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of its choosing and Respondent represents that it had an opportunity to do so prior to signing this Order. Respondent acknowledges that it has been given a reasonable period of time in which to consider the terms of this Order before signing it. Respondent acknowledges and confirms that it has entered into this Order voluntarily and of its own free will, without duress or coercion, and that it is competent to enter into this Order. Respondent acknowledges that it has carefully read and fully understands the meaning and intent of this Order;
81. Respondent further understands and knowingly and voluntarily waives the following rights:
  - a. The right to proceed with an adjudicatory proceeding;
  - b. The right to subpoena and cross-examine witnesses, present evidence and testify on Respondent's own behalf at that adjudicatory proceeding; and
  - c. The right to appeal this Order;
82. 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;
83. 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 this Order shall be given full force and effect;
84. 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. Respondent does not agree that this Order (or any of the contents thereof) will have, and neither the Commission nor Respondent intend for this Order to have, preclusive or estoppel effect in any other forum, including, without limitation, any private civil action in which Respondent is, or may be, a party; provided, however, that any such private civil action does not include the Commission as a party;
85. 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;
86. The Commission may reject the terms of this Order or otherwise deny ratification and entry of this Order. In such event, the terms of this Order shall be null and void and the Parties may proceed to hearing;

87. 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;
88. 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
89. For purposes of addressing any future violations of this Order, applicable law or regulations shall be construed to include all amendments and revisions to said law or 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 shall result in administrative action against Respondent up to and including suspension and/or revocation of licensure or registration.

**Respondent Assured Testing Laboratories, LLC**

Dimitrios Pelekoudas

08/11/2025 PDT

Signer ID: AVDKATQW16...

Dimitrios Pelekoudas, Ph.D., Owner and CEO

Date Signed

**Commonwealth of Massachusetts Cannabis Control Commission**

Ratified by Commission vote (3 yes, 0 no, 0 abstain) on August 14, 2025.

Travis Ahern

Travis Ahern, Executive Director

8/14/2025

Date Signed