

# Mille Lacs Band of Ojibwe

## <u>Department of Cannabis Regulation</u> <u>Cannabis Regulations</u>

December 8, 2025

#### NOTICE OF ADOPTION

Pursuant to 15 MLBS § 1203(f)(iii)(B), this serves as the official Notice of Adoption the following:

#### **Cannabis Regulation – 18: LICENSE ENFORCEMENT**

Summary of changes, to CR – 18: LICENSING include:

This Regulation implements 15 MLBS §§ 1210(r)-(g) and 1211 and Compact Art. IV. H. The purpose of this Regulation is to outline the Department's authority and processes to enforce license requirements, the Code, and the Band's Cannabis Regulations within and outside of the Band's Tribally Regulated Land, and, when required, in coordination with the State of Minnesota.

Pursuant to 15 MLBS § 1203(f)(ii): The Department of Cannabis Regulation reviewed the comments received during the comment period, beginning October 27, 2025, and closing December 1, 2025. The Department of Cannabis Regulation hereby responds to comments below and makes changes as applicable.

Comment 1: CR-18. Changes to clarify and ensure consistent use of calendar days vs. business days, capitalization, internal reference, spacing and tab size were made.

Comment 2: 3.1.1.a.- Enforcement Actions for License Violations. What does communication to the employer regarding a Corrective Action Order look like when the individual is an employee of a licensed business? The licensed business would need this information to ensure accountability. No Change Needed.

<u>Citation 3.1.1.a.-</u> "Corrective Action Order. The Department may issue an administrative order requiring the business licensee, employee licensee, or vendor licensee to correct the violation, to cease and desist from committing the violation, to pay a monetary fine as set forth under section 3.3, or to undertake any other action that the Department may mandate. The order must clearly state the deficiencies that constitute the violation, the time by which the violation must be corrected, and any other related directives, including any requirements and deadlines for submission of proof of correction to the Department."

• Clarification: This will be detailed in DCR procedure. It is the intent of the Department to communicate with all current employers (DCR cannabis business licensees) of licensed cannabis business employee enforcement actions.

Comment 3: 3.1.1.b.- Enforcement Actions for License Violations. What does communication to the employer regarding a Suspension Order look like when the individual is an employee of a



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licensed business? Will the DCR maintain and share a list of licensed vendors' status, so we know if a business is not in "good standing"?

Citation 3.1.1.b.- <u>Suspension Order</u>. "The Department may issue an administrative order suspending a cannabis business license, employee license, or vendor license. Such order may include other remedies available to the Department, including corrective action and a monetary fine as set forth under section 3.3."

- Clarification: This will be detailed in DCR procedure. It is the intent of the Department to communicate with all current employers (DCR cannabis business licensees) of licensed cannabis business employee enforcement actions.
- Clarification: A real-time vendor list will be accessible in GreenPath, the DCR's online licensing platform.

Comment 4: 3.3.1.- Monetary Fines. Should "employee license" be "employee licensee"?

Citation 3.3.1.- "The Department may not issue a monetary fine of more than \$5,000 per business licensee, *employee license*, or vendor licensee, per license violation and may not issue a fine of greater than \$10,000, per licensee in the aggregate for violations stemming from the same predicate act."

• Correction made: Agreed, employee "license" is changed to employee "licensee."

Comment 5: 3.4.1.- Reconsideration of Enforcement Action. Should "employer licensee" be "employee license"?

Citation 3.4.1.- "Within 15 calendar days after the date of issuance of any enforcement action taken pursuant to sections 3.1 and 3.2, a business licensee, employer licensee, or vendor licensee may submit a written request to the Executive Director for reconsideration of the administrative order imposing the enforcement action if the business licensee, *employer licensee*, or vendor licensee believes the administrative order was issued in error."

• Correction made: Agreed, "employer" licensee is changed to "employee" licensee.

Effective Date: December 8, 2025.

The Department of Cannabis Regulation attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the Department of Cannabis Regulation and at <u>Department of Cannabis Regulation (DCR) | Mille Lacs Band of Ojibwe</u>.

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Department of Cannabis Regulation Board	Date