

BEFORE THE EXECUTIVE DIRECTOR, DEPARTMENT OF REVENUE  
STATE LICENSING AUTHORITY  
STATE OF COLORADO

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**STIPULATION, AGREEMENT AND ORDER**

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IN THE MATTER OF:

Trichome Health Consultants Inc  
Medical Marijuana Cultivation Facility License No. 403-00346  
Medical Marijuana Cultivation Facility License No. 403-00349  
Medical Marijuana Cultivation Facility License No. 403-01871

Camilla Elizabeth Hall  
Owner License No. M00468

Licensees.

MED Complaint No. 2021-0071

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THIS STIPULATION, AGREEMENT, AND ORDER (“Order”) between the Department of Revenue, Marijuana Enforcement Division (“Division”) and Trichome Health Consultants Inc (Medical Marijuana Cultivation Facility License Nos. 403-00346, 403-00349, 403-01871), and Camilla Elizabeth Hall (Owner License No. M00468) (collectively “Licensees”), is offered for the purposes of settlement and to avoid the uncertainty and cost of future administrative action. The Division and Licensees submit to and agree as follows:

1. The Executive Director of the Department of Revenue as the State Licensing Authority (“State Licensing Authority”) has jurisdiction over Licensees and the subject matter herein pursuant to subsection 44-10-201(1)(a), C.R.S.
2. Pursuant to subsection 44-10-202(1)(b), C.R.S., the State Licensing Authority has the authority to: grant or refuse state licenses for the cultivation, manufacture, distribution, sale, hospitality, and testing of Regulated Marijuana and Regulated Marijuana Products<sup>1</sup> as provided by law; suspend, fine, restrict, or revoke such licenses, whether active, expired, or surrendered, upon violation of article 10 of

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<sup>1</sup>The terms “Regulated Marijuana” and “Regulated Marijuana Products” include: medical marijuana, retail marijuana, medical marijuana products, and retail marijuana products.

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title 44, C.R.S., or any rule promulgated pursuant to article 10 of title 44, C.R.S.; and impose any penalty authorized by article 10 of title 44, C.R.S. or any rule promulgated pursuant to article 10 of title 44, C.R.S.

3. Licensees have been the subject of an investigation conducted by the Division. The Division alleges violations of the Colorado Marijuana Code, sections 44-10-101 *et seq.*, C.R.S. (“Marijuana Code”), and the rules promulgated pursuant to the Marijuana Code at 1 CCR 212-3 (“Marijuana Rules”).
4. Pursuant to subsection 44-10-901(1), C.R.S., the State Licensing Authority has the power, on its own motion or on complaint, after investigation and opportunity for a public hearing at which licensees shall be afforded an opportunity to be heard, to fine, suspend, or revoke a license, or impose any other sanction authorized by the Marijuana Code or the Marijuana Rules, for a violation by the licensee or any agents or employees of the licensee.
5. Trichome Health Consultants Inc (“Trichome”) holds the following licenses licensed by the State Licensing Authority (collectively, the “Licensed Cultivation Facilities”):
  - a. Medical Marijuana Cultivation Facility License No. 403-00346, located at 2295 Busch Avenue, Unit 3, Colorado Springs, Colorado 80904 (“Busch Licensed Premises”).
  - b. Medical Marijuana Cultivation Facility License No. 403-00349, located at 3425 Van Teylingen Drive, Suites D & E, Colorado Springs, Colorado 80917 (“Van Teylingen Licensed Premises”).
  - c. Medical Marijuana Cultivation Facility License No. 403-01871, located at 1001 South Royer Street, Colorado Springs, Colorado 80903 (“Royer Licensed Premises”).
6. Camilla Elizabeth Hall (“Hall”), Owner License No M00468, is the ██████% Controlling Beneficial Owner of Trichome.
7. On July 13, 2022, the State Licensing Authority issued an Order to Show Cause, Notice of Duty to Answer, and Notice of Hearing (“Order to Show Cause”) to Licensees attached hereto as **Exhibit 1**.
8. This matter has been set for a three-day administrative hearing from November 1 through November 3, 2022.

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9. The Division and Licensees have come to a mutual agreement and understanding to jointly propose to the State Licensing Authority a resolution of the allegations in lieu of proceeding through an administrative hearing to determine the merits of such allegations in the Order to Show Cause.
10. The terms and conditions of this Order are subject to approval by the State Licensing Authority.
11. Licensees admit to the following facts and administrative violations:
  - a. On or about March 25, 2021 Division Investigators reviewed Trichome's Inventory Tracking System account to inspect medical marijuana harvest batches produced by the Licensed Cultivation Facilities.
  - b. Between May 1, 2020 and December 15, 2020, the Busch Licensed Premises produced and transferred [REDACTED] packages of medical marijuana flower without submitting samples for contaminant and potency testing.
  - c. Between May 1, 2020 and January 13, 2021, the Van Teylingen Licensed Premises produced [REDACTED] packages of medical marijuana flower without submitting samples for contaminant and potency testing.
  - d. Between April 7, 2020 and November 19, 2020, the Royer Licensed Premises transferred [REDACTED] packages of medical marijuana flower without submitting samples for contaminant and potency testing.
  - e. The Busch Licensed Premises was process validated for pesticide testing only in October 2018, but lost process validation in March 2019 for lack of required follow-up testing.
  - f. The Van Teylingen Licensed Premises was process validated for microbial testing only in May 2018, but lost process validation in March 2019 for lack of required follow-up testing.
  - g. The Royer Licensed Premises was process validated for microbial testing only in October 2018, but lost process validation in March 2019 for lack of required follow-up testing.
  - h. On April 5, 2021, Division Investigators conducted a site visit at the Royer Licensed Premises and observed [REDACTED] untagged vegetative medical marijuana plants.

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- i. On April 5, 2021, Division Investigators conducted a site visit at the Busch Licensed Premises and observed [REDACTED] untagged vegetative medical marijuana plants, and [REDACTED] improperly tagged vegetative marijuana plants.
  - j. Licensees failed to collect and submit test samples for contaminant testing as required for each Harvest or Production Batch.
  - k. Licensees failed to perform required contaminant testing prior to transferring medical marijuana packages from the Licensed Cultivation Facilities.
  - l. Licensees failed to properly tag vegetative regulated marijuana plants with RFID tags, as required by the Inventory Tracking System.
  - m. Licensees violated Rule 4-120(A)(1), 1 CCR 212-3, by transferring medical marijuana without performing required contaminant testing, and without having achieved process validation.
  - n. Licensees violated Rule 4-120(B)(4), 1 CCR 212-3, by failing to submit harvest batch test samples for contaminant testing once every 30 days to maintain process validation.
  - o. Licensees violated Rule 4-125(B)(2), 1 CCR 212-3, by failing to perform quarterly medical marijuana potency testing after obtaining process validation.
  - p. Licensees violated Rule 3-805(D)(2), 1 CCR 212-3, by failing to physically attach RFID tags to every regulated marijuana plant greater than eight inches tall or eight inches wide being cultivated at the Licensed Cultivation Facilities.
12. Licensees agree, in lieu of proceeding with an administrative hearing and subsequent proceedings, to the following:
- a. Licensees agree to pay, and to be jointly and severally responsible for, a **ten thousand dollars and no cents (\$10,000.00) fine**. The fine shall be paid by certified check or money order, made payable to the Colorado Department of Revenue **within sixty (60) days** following service of a copy of the fully executed Order, as reflected in the Certificate of Service below. Licensees shall contact Jasmin Quijano at the Division at

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[jasmin.quijano@state.co.us](mailto:jasmin.quijano@state.co.us) to discuss procedures for delivery and payment of the fine.

- b. Licensees shall provide the Division with updated Standard Operating Procedures (“SOPs”) related to testing for the Licensed Cultivation Facilities **within thirty (30) days** of service of the fully executed Order. Licensees shall submit the SOPs to Jasmin Quijano at the Marijuana Enforcement Division at [jasmin.quijano@state.co.us](mailto:jasmin.quijano@state.co.us).
  - c. Licensees agree that **within thirty (30) days** of service of the fully executed Order, Licensees shall provide the Division with written identification of designated Test Batch Collectors and documentation of Test Batch Collector Training pursuant to Rules 4-110(B)(1) and (3), 1 CCR 212-3. Licensees shall submit their Test Batch Collector designations and training documentation for all of the Licensed Cultivation Facilities to Jasmin Quijano at the Marijuana Enforcement Division at [jasmin.quijano@state.co.us](mailto:jasmin.quijano@state.co.us).
13. Licensees agree that Licensees will not recommit any of the violations related to the admissions in paragraph 11, and that Licensees will remain in compliance with the Marijuana Code and Marijuana Rules.
  14. Licensees acknowledge receipt of sufficient notice, advisement of rights, and wish to resolve all issues, which were the subject of the investigation or in any way related to the investigation, by entering into this Order.
  15. Except as reflected in this Order, neither the facts nor circumstances relating to the underlying complaint or investigation that formed the basis for this Order against Licensees nor any defenses that Licensees may have to such complaint and/or investigation shall be at issue in a proceeding against Licensees for failing to comply with the terms of this Order.
  16. Licensees agree that if Licensees apply for a new license, or seek reissuance or reinstatement of any license, registration, or permit pursuant to the Marijuana Code, or any successor to such Codes, the Division may consider the facts and circumstances surrounding this Order. Further, this Order and related circumstances shall be admissible as evidence at any future hearing before the State Licensing Authority and may be used in connection with any future actions by the State Licensing Authority.
  17. Licensees agree and acknowledge that they entered into this Order knowingly and voluntarily, that the terms of this Order were mutually negotiated and agreed upon, that each party was afforded the opportunity to consult with legal counsel,

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that each party has read this Order and fully understands its nature, meaning, and content, and that each party agrees that upon approval of this Order, no subsequent action or assertion shall be maintained or pursued by either party asserting the invalidity in any manner of this Order.

18. Licensees further understand and knowingly and voluntarily waive the following rights with respect to the allegations, facts, and issues that are the subject of this Order:
  - a. The right to a public hearing on the merits of the matters forming the basis of this Order;
  - b. The right to cross-examine all witnesses against Licensees at a public hearing;
  - c. The right to subpoena witnesses and documents, to present evidence and to testify on Licensees' own behalf at a public hearing;
  - d. The right to engage in pre-hearing exchange of evidence with the Division, and to review the Division's evidence prior to hearing; and
  - e. The right to file exceptions and seek administrative review of an initial decision.
19. By signing this Order, Licensees consent to the terms and conditions described herein and agree to waive the right to judicial review of this Order pursuant to section 24-4-106, C.R.S.
20. Upon execution by all parties, this Order shall have the same force and effect as an order entered after a formal hearing pursuant to sections 24-4-105 and 44-10-901, C.R.S., except that it may not be appealed. Failure to comply with the terms of this Order may be sanctioned by the State Licensing Authority as set forth in the Marijuana Code.
21. 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, or, if challenged, the State Licensing Authority determines that a provision is unproven, such provision shall be severed, unless material to the Order, and the remainder of this Order shall be given full force and effect.
22. This Order shall be binding upon Licensees, individually or through an ownership interest in an entity, and shall inure to the benefit of the parties to this Order and their respective successors and assigns, and shall be construed in accordance with and governed by the laws of the State of Colorado.

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23. All costs and expenses incurred by Licensees to comply with this Order shall be the sole responsibility of the Licensees, and shall not in any way be the obligation of the Division. Costs for which Licensees are exclusively responsible include, but are not limited to, litigation costs, costs incurred by Licensees for any court appointee(s), attorneys' fees, and costs incurred by Licensees for any other professional expenses.
24. Upon approval and order of the State Licensing Authority, this Order shall become a permanent part of the record, and shall be open to public inspection and published pursuant to the Division's standard policies and procedures and applicable law.
25. This Order shall be effective on the date this Order is served upon the parties as set forth in the attached Certificate of Service. Should the State Licensing Authority reject the terms hereof, Licensees may withdraw the admissions herein, engage in renegotiation of the terms, or agree to reset this matter for a hearing on the Order to Show Cause.
26. This Order may be executed by electronic means (facsimile, e-mail, DocuSign etc.), and any signatures delivered electronically will be deemed to be as valid as an original signature.
27. For the purpose of addressing any future violations of the Order, the Marijuana Code and/or the Marijuana Rules shall hereby include all later adopted codes, rules, or regulations that are in effect at the time of the violation(s).
28. This Order constitutes the entire agreement and understanding between the parties, and supersedes all prior agreements and promises related to the allegations, facts, and issues that are the subject of this Order, written or oral between the parties, which modify, interpret, construe or affect this Order. Any other allegations, facts and issues not specifically raised or addressed in this Order have not been considered by the parties and are not made a part of this Order.

*SIGNATURE PAGE FOLLOWS*

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<p><b>Dominique D. Mendiola</b> Digitally signed by Dominique D. Mendiola Date: 2022.10.29 12:40:22 -06'00'</p> <hr/> <p>Dominique D. Mendiola Senior Director Marijuana Enforcement Division</p> <p>Dated in the electronic signature above.</p>	<hr/> <p>Camilla Elizabeth Hall, Individually and as 100% owner of Trichome Health Consultants Inc, Owner License No. M00468,</p> <hr/> <p>Date</p>
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**ORDERED AND APPROVED** on the date set forth in the electronic signature below.

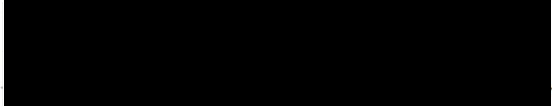
**Mark Ferrandino** Digitally signed by Mark Ferrandino  
Date: 2022.11.04 08:09:17 -07'00'

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Mark Ferrandino  
Executive Director/CEO  
Department of Revenue  
State Licensing Authority



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<hr/> <p>Dominique D. Mendiola Senior Director Marijuana Enforcement Division</p> <p>Dated in the electronic signature above.</p>	 <p>Camilla Elizabeth Hall, Individually and as [REDACTED] % owner of Trichome Health Consultants Inc, Owner License No. M00468,</p> <p><u>OCTOBER, 19, 2022</u></p> <p>Date</p>
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**ORDERED AND APPROVED** on the date set forth in the electronic signature below.

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Mark Ferrandino  
Executive Director/CEO  
Department of Revenue  
State Licensing Authority

