BEFORE THE CANNABIS CONTROL DIVISION
OF THE REGULATION AND LICENSING DEPARTMENT
FOR THE STATE OF NEW MEXICO

IN THE MATTER OF:	)	
	)	**CASE NO. 2025-009**
Gold Fish Farms and Dispo, LLC;	)	
License No.(s) PROD-2022-0078;	)	
MANU-2023-0047; **Rhea Estrada;**	)	
Adrienne Hubbard;	)	
Respondent(s).	)	
	)	

NOTICE OF CONTEMPLATED ACTION

TAKE NOTICE that the Superintendent of the Regulation and Licensing Department ("Department") and the Cannabis Control Division ("CCD") are contemplating taking disciplinary action against the license held by Gold Fish Farms and Dispo, LLC; License No. PROD-2022-0078-PRM-0001 & MANU-2023-0047, with controlling persons of Rhea Estrada and Adrienne Hubbard ("Respondent"). The Department and the CCD have before them sufficient evidence that, if not rebutted or satisfactorily explained at a formal hearing, will justify the Department and the CCD revoking, suspending, issuing fines, or taking other disciplinary action against the Respondent's license. If Respondent does not request a hearing within twenty (20) days after service of this Notice of Contemplated Action ("Notice"), the Department and the CCD will proceed to take the action contemplated in this Notice, and such action will be final and not subject to judicial review. Respondent may also request a settlement conference to determine whether a compromise of the penalty may be reached.

APPLICABLE LAW

1. Respondent is licensed pursuant to the Cannabis Regulation Act ("CRA"), §§ 26-2C-1 to –42 NMSA 1978 (2025), and as such is subject to the jurisdiction of the Department and CCD. The Department and CCD have jurisdiction over this disciplinary action pursuant to the Uniform Licensing Act ("ULA"), §§ 61-1-1 to 36 NMSA 1978 (as amended through 2025).

2. This Notice is based upon the following alleged statutory or regulatory violation(s):

   VIOLATION #1: Engaging in Commercial Cannabis Production Activity Without a State License
   RULE CITATION OF VIOLATIONS: §61-1-3.2 NMSA & §16.8.2.21 (C) NMAC
   DESCRIPTION OF VIOLATION #1 AS IT PERTAINS TO RULE:

Pursuant to § 61-1-3.2 NMSA of the ULA, any person who engages in commercial activity without an active license for which such activity would otherwise require a license is subject to a civil disciplinary fee of $10,000 for each instance of unlicensed activity.

Respondent's production license, PROD-2022-0078-PRM-0001, associated with the property located at 19 Carson St., Veguita, NM 87062, expired on April 26, 2025. Respondent did not submit a completed annual renewal application or obtain a renewed license prior to the license's expiration. Despite the absence of a valid state license, during an onsite visit to the facility on April 29, 2025, CCD compliance officers observed 242 mature cannabis plants and hundreds of immature plants, indicating that active production was ongoing. During a subsequent onsite visit on August 18, 2025, CCD compliance officers observed over 500 mature cannabis plants, further confirming that active cannabis production continued at the facility without a valid production license.

VIOLATION #2: Failure to Timely Renew License
RULE CITATION OF VIOLATIONS: §61-1-3.2 NMSA & §16.8.2.14(C) NMAC
DESCRIPTION OF VIOLATIONS #2 AS IT PERTAINS TO RULE:

Licensees are required to submit a complete renewal application prior to the expiration of their cannabis license, if a license renewal application is not submitted and approved prior to the license expiration date, the licensee must cease all commercial cannabis activity, including the sale, transfer, transport, manufacture, testing, or distribution of medical or commercial cannabis or cannabis products, until the license is renewed. Upon the nonrenewal of a license, CCD may initiate disciplinary action pursuant to the Uniform Licensing Act, §§ 61-1-1 et seq., NMSA 1978.

Respondent was issued a license by the CCD to engage in commercial cannabis production, however, Respondent failed to maintain an active license by not submitting a renewal application prior to its license expiration on April 26, 2025. As a result, Respondent was required to immediately cease all commercial cannabis activity as of that date. Instead, Respondent continued operations in violation of state law and rule. On April 29, 2025, CCD compliance officers observed Respondent engaged in active cannabis production at a location no longer authorized for such activity. Additionally, during a subsequent onsite visit on August 18, 2025, CCD compliance officers observed that Respondent continued to operate and conduct cannabis production activities despite the absence of a valid license.

VIOLATION #3: Lack of Required Cameras, Key Area of Operation Not Under Surveillance
RULE CITATION OF VIOLATION: §16.8.2.10(D) & §16.8.2.10(E) NMAC
DESCRIPTION OF VIOLATION #3 AS IT PERTAINS TO RULE:

Licensees are required to maintain an active digital surveillance system on their premises that monitors all entrances, exits, and any area where cannabis activity takes place, including areas where cannabis and cannabis products are cultivated, produced, manufactured, weighed, packaged, stored, loaded and unloaded for transportation,

prepared, or moved within the licensed premises. Licensees are also required to provide the CCD with footage from the digital surveillance system upon request.

During multiple onsite visits conducted by CCD compliance officers at Respondent's commercial cannabis facility located at 19 Carson St., Veguita, NM 87062, including visits on January 22, 2024, November 12, 2024, April 29, 2025, and August 18, 2025, CCD compliance officers observed that the facility had insufficient camera coverage in areas where surveillance is required.

VIOLATION #4: Inputting False Information in the Track and Trace System
RULE CITATION OF VIOLATION: §16.8.2.8(J) and §16.8.7.8(D)(5) NMAC
DESCRIPTION OF VIOLATION #4 AS IT PERTAINS TO RULE:

Licensees are required to utilize state-approved track-and-trace software that accurately records all cannabis activity, including but not limited to plant life cycle stages, harvest events, weights, and transfers of cannabis and cannabis products within a licensed facility. All entries made into the track-and-trace system must truthfully reflect lawful and compliant activity as it occurs in physical reality.

On April 29, 2025, during an onsite visit, CCD compliance officers observed 242 mature cannabis plants and hundreds of immature plants at Respondent's facility. Despite this active production, corresponding activity was not accurately reflected in the state-mandated track-and-trace system. During a subsequent onsite visit on August 18, 2025, CCD compliance officers observed over 500 mature cannabis plants at the facility. During this visit, Respondent informed CCD compliance officers that they had knowingly manipulated the track-and-trace system associated with their production license by recording a "harvest" in the electronic system without actually physically harvesting the plants. Respondent then electronically transferred the plants to their manufacturing license as if a harvest had occurred and later manually adjusted the recorded weights in the system after the plants were physically harvested. Respondent conducted this manipulation to continue cannabis production despite the lapse of their state license. As a result, the track-and-trace records were materially false, incomplete, and misrepresentative of the actual cannabis activity occurring at the facility.

VIOLATION #5: Failure to Properly Reconcile All Cannabis Products Each Day in the Track and Trace System.
RULE CITATION OF VIOLATION: §16.8.7.10(A) NMAC
DESCRIPTION OF VIOLATION #5 AS IT PERTAINS TO RULE:

Licensees are required to reconcile all on-premises and in-transit cannabis and cannabis products in the state-mandated track-and-trace system on a daily basis.

During an onsite inspection at Respondents facility located at 19 Carson St., Veguita, NM 87062, on January 22, 2024, CCD compliance officers observed that Respondent's track-and-trace system was out of date and did not accurately reflect current cannabis activity at the facility.

During a subsequent inspection on November 12, 2024, CCD compliance officers again identified significant discrepancies between Respondent's track-and-trace records and actual onsite inventory. Respondent's BioTrack account reflected 1,000 active cannabis plants, while officers counted only 150 plants physically present at the facility. Additional onsite visits conducted on April 29, 2025, and August 18, 2025, revealed continued and substantial inaccuracies in Respondent's track and trace system, with both plant counts and inventory records incorrect at each visit.

VIOLATION #6: Failure to Properly Tag Cannabis Plants and Products
RULE CITATION OF VIOLATION: §16.8.7.7 & §16.8.7.14(B)(8) NMAC
DESCRIPTION OF VIOLATION #6 AS IT PERTAINS TO RULE:

Licensees are required to properly tag all immature and mature cannabis plants, as well as all cannabis and cannabis products, in accordance with state rules. Each cannabis plant or product, and any batch, lot, or sublot derived from it, must be assigned a unique physical tag that remains affixed and traceable throughout its lifecycle.

During multiple onsite visits of Respondents facility located at 19 Carson St., Veguita, NM 87062, including inspections on January 22, 2024, November 12, 2024, April 29, 2025, and August 18, 2025, Respondent repeatedly failed to properly tag cannabis plants and products as required. CCD compliance officers observed that plants in all stages of growth were not tagged and that frozen cannabis flower stored on site during each inspection lacked any associated tags. During the April 29, 2025, inspection, Respondent provided CCD compliance officers with five plant tags they claimed were associated with flowering plants. However, upon review of the associated BioTrack data, those tags were found to correspond to cannabis that had already been harvested, not to the plants that were presently growing at the facility. During the August 18, 2025, inspection, CCD compliance officers observed approximately 200 pounds of fresh frozen cannabis on site that was not tagged or otherwise identified as required by rule.

VIOLATION #7: Lack of Premise Diagram
RULE CITATION OF VIOLATION: §§16.8.2.14(A) through (E) NMAC
DESCRIPTION OF VIOLATION #7 AS IT PERTAINS TO RULE:

Licensees are required to maintain a current premises diagram that identifies where each cannabis activity is taking place within the licensed facility.

During multiple onsite visits of Respondents facility located at 19 Carson St., Veguita, NM 87062, including inspections on January 22, 2024, November 12, 2024, April 29, 2025, and August 18, 2025, Respondent did not have an accurate premises diagram available on site as required. Despite the absence of this required documentation, Respondent was operational, with hundreds of mature and immature cannabis plants on site.

SUMMARY OF THE EVIDENCE AGAINST RESPONDENT

3. The general nature of the evidence before the Department and the CCD is as follows:

a. CCD Compliance Officer reports and inspection checklists.

b. Testimony by CCD Compliance Officers who conducted investigations.

c. Photos of Respondents facility taken by CCD Compliance Officers during the course of their inspections and investigations.

RIGHTS AND OBLIGATIONS OF RESPONDENT

4. **Unless Respondent requests a formal hearing, the evidence before the Department and the CCD is sufficient to justify the Department and the CCD in taking the contemplated action**.

5. The formal hearing, if requested, will be conducted pursuant to the ULA as provided by §61-1-8 NMSA. §61-1-8 NMSA provides that:

> A. A party entitled to be heard pursuant to the provisions of the Uniform Licensing Act shall have the right to be represented by counsel; to present all relevant evidence by means of witnesses and books, papers, documents and other evidence; to examine all opposing witnesses who appear on any matter relevant to the issues; and to have subpoenas and subpoenas duces tecum issued as of right prior to the commencement of the hearing to compel discovery and the attendance of witnesses and the production of relevant books, papers, documents and other evidence upon making written request therefor to the [CCD] or hearing officer. The issuance of such subpoenas after the commencement of the hearing rests in the discretion of the CCD or the hearing officer. All notices issued pursuant to §61-1-4 NMSA shall contain a statement of these rights.
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> B. Upon written request to another party, any party is entitled to: (1) obtain the names and addresses of witnesses who will or may be called by the other party to testify at the hearing; and (2) inspect and copy any documents or items which the other party will or may introduce in evidence at the hearing. The party to whom such a request is made shall comply with it within ten days after the mailing or delivery of the request. No request shall be made less than fifteen days before the hearing.
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> C. Any party may take depositions after service of notice in accordance with the Rules of Civil Procedure for the District Courts. Depositions may be used as in proceedings governed by those rules.

6. **If Respondent does not request a hearing in this matter, the Department and the CCD will take the contemplated action by default. *See* § 61-1-4(D)(3) NMSA. If no hearing is requested, this disciplinary action will not be subject to judicial review. *See* § 61-1-4(E) NMSA**.

7. To request a hearing on this matter Respondent must deposit in the mail a certified return receipt requested letter addressed to the CCD containing a request for a hearing within twenty days after services of this notice. *See* §61-1-4 (D)(3) NMSA. A written request for a hearing should be sent to the following address:

Eden M. Sayers
Cannabis Control Division
2550 Cerrillos Road
Santa Fe, NM 87505

8. If Respondent requires auxiliary aids and translation services for effective communication during the hearing on this matter, they must submit to the CCD in writing a statement that includes the specific aid's and/or language translation services requested. This statement must be included as an attachment to the written request for a hearing.

Clay Bailey

Clay Bailey, Superintendent
Regulation and Licensing Division

Prepared by:

Eden M. Sayers
Division Counsel
Cannabis Control Division,
Regulation and Licensing Department
1209 Camino Carlos Rey
Santa Fe, NM 87504
Eden.sayers@rld.nm.gov
(505) 470-8003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was mailed to Respondent by United States Postal Service Certified Mail, return receipt requested, on this 8th day of October 2025 to the following:

Gold Fish Farms and Dispo, LLC. P.O. Box 536 Veguita, NM 87062	Certified Mail No. 9589 0710 5270 2159 3333 02 Return Receipt Requested
Gold Fish Farms and Dispo, LLC. 19 Carson St. Veguita, NM 87062	Certified Mail No. 9589 0710 5270 2159 3333 19 Return Receipt Requested
Gold Fish Farms and Dispo, LLC. 3501 Mary Ellen Ct. NE Albuquerque, NM 87111	Certified Mail No. 9589 0710 5270 2159 3333 26 Return Receipt Requested
Gold Fish Farms and Dispo, LLC. 1209 Mountain Road Pl. NE Ste. N Albuquerque, NM 87110	Certified Mail No. 9589 0710 5270 2159 3333 33 Return Receipt Requested

I hereby certify that a true and correct copy of the foregoing was e-mailed, on this 8th day of October 2025 to the following:

Gold Fish Farms and Dispo, LLC.
Respondent
E-mail: accounting@goldfishfarms.com; goldfishfarmsnm@gmail.com & ahindi11@gmail.com

By: *Eden M Sayers*
Eden M. Sayers
Cannabis Control Division