

Bureau of Marijuana Licensing: Citations Findings 2025



Bureau of Marijuana Licensing: Citation Findings

Table of Contents

1.0 Adult Use and Medical Marijuana Statutes and Rules	2
1.1 Adult and Medical Marijuana Licenses Overview	2
2.0 Top Citations	3
2.1 Establishment Cultivation Citations	3
2.2 Manufacturing Site Citations	3
2.3 Dispensary Cultivation Citations	3
2.4 Retail Site Citations	3
3.0 AZCareCheck	4
Appendix 1 Top Citations Across all Location Types	5
Appendix 2 Top Citations at Establishment Cultivations	8
Appendix 3 Top Citations at Manufacturing Sites	10
Appendix 4 Top Citations at Dispensary Cultivations	12
Appendix 5 Top Citations Across Retail Locations	15

1.0 Adult Use and Medical Marijuana Statutes and Rules

The Arizona Revised Statutes (A.R.S.) are the statutory laws of the state of Arizona. The Arizona Administrative Code (A.A.C.) is the book of rules, or administrative laws, for the state. A.R.S. Title 36, Chapter 28.1 and A.A.C. Title 9, Chapter 17 each contain requirements applicable to the Arizona Medical Marijuana Program. Accordingly, to fully understand all the requirements applicable to the Arizona Medical Marijuana Program, the Arizona Medical Marijuana statutes and rules should be read in conjunction with each other.

A.R.S. Title 36, Chapter 28.2 and A.A.C. Title 9, Chapter 18 each contain requirements applicable to the Adult-Use of Marijuana Program (the Smart and Safe Arizona Act (SASAA)). Accordingly, to fully understand all the requirements applicable to the Adult-Use of Marijuana Program, the Arizona Adult-Use Marijuana statutes and rules should be read in conjunction with each other.

1.1 Adult and Medical Marijuana Licenses Overview

As of December 31, 2025, there were 136 operating medical marijuana dispensary licenses and 169 operating adult-use establishment licenses.

2.0 Top Citations

Between January 1, 2025 and December 31, 2025, there were 1,050 citations issued to 225 licenses, including both dispensary and establishment licenses. Plans of correction were

submitted to and accepted by ADHS for each of the citations. Sixty-nine of the citations resulted in enforcement. Appendix 1 provides the top citations of 2025 across all locations and license types.

2.1 Establishment Cultivation Citations

Between January 1, 2025, and December 31, 2025, there were 175 citations issued at establishment cultivations to 33 licenses. Appendix 2 provides the top citations at establishment cultivation sites in 2025.

2.2 Manufacturing Site Citations

Between January 1, 2025, and December 31, 2025, there were 48 citations issued at manufacturing sites to 17 licenses. Appendix 3 provides the top citations at manufacturing sites in 2025.

2.3 Dispensary Cultivation Citations

Between January 1, 2025 and December 31, 2025, there were 220 citations issued at dispensary cultivation sites to 50 licenses. Appendix 4 provides the top citations at dispensary cultivation sites in 2025.

2.4 Retail Site Citations

Between January 1, 2025, and December 31, 2025, there were 607 citations issued at retail locations to 195 licenses. Appendix 5 provides the top citations at retail locations in 2025.

3.0 AZCareCheck

[AZCareCheck](#) is a searchable database containing licensing history, which may include deficiencies and/or enforcement actions found against facilities and providers by the Arizona Department of Health Services (ADHS). AZCareCheck is Primary Source Verified, meaning the provider or facility information generated is accurate and current. AZCareCheck is maintained and updated daily by ADHS and not by an outside source. As it relates to marijuana, citations and enforcements against adult-use marijuana establishment licenses and marijuana testing laboratories are accessible. Citations and enforcements against medical marijuana licenses are not available on AZCareCheck, as they are protected under A.R.S. § 36-2810(A)(2).

- ★ You can navigate to the AZCareCheck page from the [Azdhs.gov](#) website, or enter 'Azcarecheck.com' into your browser, and it will redirect you to the AZCareCheck main webpage
 - Once on the AZCareCheck ADHS webpage, under Facilities, select Marijuana.
 - When the search page loads, select Marijuana Facilities, and you can see all the adult-use marijuana establishments and marijuana testing laboratories.
 - If you select 'Get Details' for any marijuana entity, you will find inspections and enforcements, if they exist.

Appendix 1 Top Citations Across all Location Types

A.A.C. R9-18-314(D)(1)	54	D. The individual designated in subsection (A) shall conduct and document an audit of the marijuana establishment's inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. 1. If the audit identifies a reduction in the amount of marijuana or a marijuana product in the marijuana establishment's inventory not due to documented causes, the marijuana establishment shall determine and document where the loss has occurred and take and document corrective action.
A.A.C. R9-18-312(I)(1)(c)	53	I. To prevent unauthorized access to marijuana or a marijuana product at the marijuana establishment's retail site and, if applicable, the marijuana establishment's cultivation site or manufacturing site, the marijuana establishment shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location within the marijuana establishment's retail site allowing for the identification of any consumer purchasing marijuana or a marijuana product; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage
A.A.C. R9-18-310(A)(2)(h)	51	A. A marijuana establishment shall ensure that marijuana or a marijuana product provided by the marijuana establishment's retail site to a consumer: 2. Is labeled with: h. As required by A.R.S. § 36-2854.01, a quick response code linking to a webpage that contains the following: i. The strain of the marijuana; ii. The following statement: Using marijuana during pregnancy could cause birth defects or other health issues to your unborn child; iii. Distribution chain information, including: (1) The name of the marijuana establishment; (2) If not cultivated by the marijuana establishment, the name and the license number or registry identification number, as applicable, of the marijuana establishment or dispensary that cultivated the marijuana; and (3) If not infused or prepared for sale by the marijuana establishment, the name and the license number or registry identification number, as applicable, of the marijuana establishment or dispensary that infused or prepared the marijuana product for sale; iv. A link to the final report of testing marijuana or a marijuana product, specified in R9-18-410(B)(3), from a marijuana testing facility; v.

		If applicable, the method used to extract tetrahydrocannabinol from the marijuana; and vi. The date of: (1) Harvest of the marijuana; and (2) If applicable, manufacture of the marijuana product
A.A.C. R9-18-312(D)(1)	29	D. Before transportation, a marijuana facility agent of a marijuana establishment shall: 1. Complete a trip plan that includes: a. The name of the marijuana facility agent in charge of transporting the marijuana, marijuana plants, or marijuana products; b. The license plate number of the vehicle being used to transport the marijuana, marijuana plants, or marijuana products; c. The date and start time of the trip; d. A description of the marijuana, marijuana plants, or marijuana products being transported; e. Any anticipated stops during the trip, including the locations of the stops and estimated arrival time and departure time for each location; and f. The anticipated route of transportation
A.A.C. R9-18-314(C)(6)	28	C. A marijuana establishment shall establish and implement an inventory control system for the marijuana establishment's marijuana and marijuana products that documents: 6. For disposal of marijuana or a marijuana product that is not to be sold, transferred, or used for making a marijuana product: a. Description of and reason for the marijuana or marijuana product being disposed of including, if applicable: i. The number of failed or other unusable plants, and ii. The results of laboratory testing; b. Date of disposal; c. Method of disposal; and d. Name and license number of the marijuana facility agent responsible for the disposal
R9-17-318(G)(1)(c)	27	G. To prevent unauthorized access to medical marijuana at the dispensary and, if applicable, the dispensary's cultivation site, the dispensary shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location allowing for the identification of any qualifying patient or designated caregiver purchasing medical marijuana; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a

		power outage; and d. Panic buttons in the interior of each building
A.A.C. R9-18-311(B)(2)	25	B. A marijuana establishment shall ensure that: 2. Except as provided in subsection (D), only one sample of each batch of marijuana or marijuana product is collected according to ANSI/ASQ Standard Z1.4 (2018), General Inspection Level II, incorporated by reference, including no future editions, and available at https://asq.org/quality-resources/z14-z19 , including: a. Use, as applicable, of one of the following sampling methods: i. Top, middle, and bottom sampling using a sample thief, a device consisting of two nested tubes with one or more aligned slots through which a sample may be collected and then sealed into the inner tube by rotating the outer tube; ii. Star pattern sampling from the top, middle, and bottom of each storage container; iii. Collecting discrete incremental units of a batch, such as every 10th unit or every 20th drop; or iv. Quartering until the sample reaches the size specified in subsection (B)(3); and b. For sampling methods specified in subsections (B)(2)(a)(i) through (iii), quartering the volume of the aggregated portions collected to obtain the sample size specified in subsection (B)(3)
A.A.C. R9-18-312(E)(2)	23	E. During transportation, a marijuana facility agent shall: 2. Use a vehicle that has a current registration with the Arizona Department of Motor Vehicles, issued according to A.R.S. Title 28, Chapter 7, Article 2: a. Without any marijuana identification; b. Equipped with a global positioning system or other means for the marijuana establishment to track the current location of the vehicle at any point in time; Capable of providing electronic information about where the vehicle has been during at least the previous 90 days; d. With operational video surveillance and recording equipment that: i. Shows the interior of the vehicle, including the driver's seat and location of the marijuana, marijuana plants, or marijuana products being transported; ii. Is turned on for the duration of a trip while marijuana or a marijuana product is in the vehicle; and iii. Either stores the recording for at least 30 calendar days or transmits the recorded images at the time of recording to another location, where the recorded images are stored for at least 30 calendar days; and e. With a locked compartment in which any marijuana, marijuana plants, or marijuana products being transported may be stored during a trip
A.A.C. R9-17-318(D)	22	D. During transportation, a dispensary agent shall: 1. Carry a copy of the trip plan in subsection (C)(1) with the dispensary agent for the duration of the trip; 2. Use a vehicle that has a current registration with the Arizona Department of Motor Vehicles, issued according to A.R.S. Title 28, Chapter 7, Article 2: a. Without any

		marijuana identification; b. Equipped with a global positioning system or other means for the dispensary to track the current location of the vehicle at any point in time; c. Capable of providing electronic information about where the vehicle has been during at least the previous 90 days; d. With an operational video surveillance system and recording equipment that: i. Shows the interior of the vehicle, including the driver's seat and location of the marijuana, marijuana plants, or marijuana products being transported; ii. Is turned on for the duration of a trip while medical marijuana or a marijuana product is in the vehicle; and iii. Either stores the recording for at least 30 calendar days or transmits the recorded images at the time of recording to another location, where the recorded images are stored for at least 30 calendar days; and e. With a locked compartment in which any marijuana, marijuana plants, or marijuana products being transported may be stored during a trip; 3. Have a means of communication with the dispensary; 4. Notate the arrival time and departure time for each stop; and 5. Ensure that the marijuana, marijuana plants, or marijuana products are stored in the locked compartment specified in subsection (D)(2)(e) and are not visible
A.A.C. R9-18-308(A)(2)(d)	19	A. A marijuana establishment shall: 2. Develop, document, and implement policies and procedures regarding: d. Laboratory testing, including: i. The analytes, including possible contaminants, to be tested for; ii. The process for separating a batch of marijuana or of a marijuana product until laboratory testing has been completed and testing results received by the marijuana establishment, as specified in R9-18-311(B)(1); iii. The process for collecting samples of marijuana or a marijuana product for laboratory testing, according to R9-18-311(B)(2), including: (1) The amount to be collected from each batch, (2) The method for ensuring that a sample collected is representative of the batch, (3) The packaging of the sample, (4) The method for documenting chain of custody for the sample, and (5) Methods to deter tampering with the sample and to determine whether tampering has occurred; iv. The process for specifying the analytes to be tested for, consistent with R9-18-311(A), and either: (1) Providing samples of marijuana or marijuana products to a marijuana testing facility for testing, or (2) Allowing a marijuana facility agent associated with a marijuana testing facility access to marijuana or marijuana product to collect samples; v. The process for requesting retesting of the remaining portion of a sample of marijuana or a marijuana product; and vi. Actions to be taken on the basis of laboratory testing results
A.A.C. R9-18-308(A)(2)(c)	19	A. A marijuana establishment shall: 2. Develop, document, and implement policies and procedures regarding: c. Inventory control, including: i. Tracking, ii. Packaging, iii. Acquiring marijuana or marijuana products from a dispensary or another marijuana establishment, and iv. Providing marijuana or marijuana products to another marijuana establishment or a dispensary

Appendix 2 Top Citations at Establishment Cultivations

Row Labels	Count of Item #	Citation Text
A.A.C. R9-18-312(I)(1)(c)	15	I. To prevent unauthorized access to marijuana or a marijuana product at the marijuana establishment's retail site and, if applicable, the marijuana establishment's cultivation site or manufacturing site, the marijuana establishment shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location within the marijuana establishment's retail site allowing for the identification of any consumer purchasing marijuana or a marijuana product; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage
A.A.C. R9-18-311(B)(2)	13	B. A marijuana establishment shall ensure that: 2. Except as provided in subsection (D), only one sample of each batch of marijuana or marijuana product is collected according to ANSI/ASQ Standard Z1.4 (2018), General Inspection Level II, incorporated by reference, including no future editions, and available at https://asq.org/quality-resources/z14-z19 , including: a. Use, as applicable, of one of the following sampling methods: i. Top, middle, and bottom sampling using a sample thief, a device consisting of two nested tubes with one or more aligned slots through which a sample may be collected and then sealed into the inner tube by rotating the outer tube; ii. Star pattern sampling from the top, middle, and bottom of each storage container; iii. Collecting discrete incremental units of a batch, such as every 10th unit or every 20th drop; or iv. Quartering until the sample reaches the size specified in subsection (B)(3); and b. For sampling methods specified in subsections (B)(2)(a)(i) through (iii), quartering the volume of the aggregated portions collected to obtain the sample size specified in subsection (B)(3)

A.A.C. R9-18-314(C)(6)	12	C. A marijuana establishment shall establish and implement an inventory control system for the marijuana establishment's marijuana and marijuana products that documents: 6. For disposal of marijuana or a marijuana product that is not to be sold, transferred, or used for making a marijuana product: a. Description of and reason for the marijuana or marijuana product being disposed of including, if applicable: i. The number of failed or other unusable plants, and ii. The results of laboratory testing; b. Date of disposal; c. Method of disposal; and d. Name and license number of the marijuana facility agent responsible for the disposal
A.A.C. R9-18-315(A)(1)	9	A. A marijuana establishment shall ensure that: 1. Any building or equipment used by a marijuana establishment for the cultivation, harvest, preparation, packaging, storage, infusion, or sale of marijuana or marijuana products is maintained in a clean and sanitary condition
A.A.C. R9-18-314(E)	8	E. A marijuana establishment shall: 1. Maintain the documentation required in subsections (C) and (D) at the marijuana establishment for at least five years after the date on the document, and 2. Provide the documentation required in subsections (C) and (D) to the Department for review upon request.

Appendix 3 Top Citations at Manufacturing Sites

Row Labels	Count of Item #	Citation Text
A.A.C. R9-18-312(I)(1)(c)	7	I. To prevent unauthorized access to marijuana or a marijuana product at the marijuana establishment's retail site and, if applicable, the marijuana establishment's cultivation site or manufacturing site, the marijuana establishment shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location within the marijuana establishment's retail site allowing for the identification of any consumer purchasing marijuana or a marijuana product; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage
A.A.C. R9-18-312(D)(1)	5	D. Before transportation, a marijuana facility agent of a marijuana establishment shall: 1. Complete a trip plan that includes: a. The name of the marijuana facility agent in charge of transporting the marijuana, marijuana plants, or marijuana products; b. The license plate number of the vehicle being used to transport the marijuana, marijuana plants, or marijuana products; c. The date and start time of the trip; d. A description of the marijuana, marijuana plants, or marijuana products being transported; e. Any anticipated stops during the trip, including the locations of the stops and estimated arrival time and departure time for each location; and f. The anticipated route of transportation
A.A.C. R9-18-314(C)(6)	4	C. A marijuana establishment shall establish and implement an inventory control system for the marijuana establishment's marijuana and marijuana products that documents: 6. For disposal of marijuana or a marijuana product that is not to be sold, transferred, or used for making a marijuana product: a. Description of and reason for the marijuana or marijuana product being disposed of including, if applicable: i. The number of failed or other unusable plants, and ii. The results of laboratory testing; b. Date of disposal; c. Method of disposal; and d. Name and license number of the marijuana facility agent responsible for the disposal

A.A.C. R9-18-311(B)(2)	4	B. A marijuana establishment shall ensure that: 2. Except as provided in subsection (D), only one sample of each batch of marijuana or marijuana product is collected according to ANSI/ASQ Standard Z1.4 (2018), General Inspection Level II, incorporated by reference, including no future editions, and available at https://asq.org/quality-resources/z14-z19 , including: a. Use, as applicable, of one of the following sampling methods: i. Top, middle, and bottom sampling using a sample thief, a device consisting of two nested tubes with one or more aligned slots through which a sample may be collected and then sealed into the inner tube by rotating the outer tube; ii. Star pattern sampling from the top, middle, and bottom of each storage container; iii. Collecting discrete incremental units of a batch, such as every 10th unit or every 20th drop; or iv. Quartering until the sample reaches the size specified in subsection (B)(3); and b. For sampling methods specified in subsections (B)(2)(a)(i) through (iii), quartering the volume of the aggregated portions collected to obtain the sample size specified in subsection (B)(3)
A.A.C. R9-18-315(A)(4)	3	A. A marijuana establishment shall ensure that: 4. All trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, canning, packaging, or other processes are cleaned daily
A.A.C. R9-18-315(A)(7)	2	A. A marijuana establishment shall ensure that: 7. All stored marijuana products are securely covered

Appendix 4 Top Citations at Dispensary Cultivations

Row Labels	Count of Item #	Citation Text
A.A.C. R9-17-318(G)(1)(c)	22	G. To prevent unauthorized access to medical marijuana at the dispensary and, if applicable, the dispensary's cultivation site, the dispensary shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location allowing for the identification of any qualifying patient or designated caregiver purchasing medical marijuana; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage; and d. Panic buttons in the interior of each building
A.A.C. R9-17-318(D)	17	D. During transportation, a dispensary agent shall: 1. Carry a copy of the trip plan in subsection (C)(1) with the dispensary agent for the duration of the trip; 2. Use a vehicle that has a current registration with the Arizona Department of Motor Vehicles, issued according to A.R.S. Title 28, Chapter 7, Article 2: a. Without any marijuana identification; b. Equipped with a global positioning system or other means for the dispensary to track the current location of the vehicle at any point in time; c. Capable of providing electronic information about where the vehicle has been during at least the previous 90 days; d. With an operational video surveillance system and recording equipment that: i. Shows the interior of the vehicle, including the driver's seat and location of the marijuana, marijuana plants, or marijuana products being transported; ii. Is turned on for the duration of a trip while medical marijuana or a marijuana product is in the vehicle; and iii. Either stores the recording for at least 30 calendar days or transmits the recorded images at the time of recording to another location, where the recorded images are stored for at least 30 calendar days; and e. With a locked compartment in which any marijuana, marijuana plants, or marijuana products being transported may be stored during a trip; 3. Have a means of communication with the dispensary; 4. Notate the arrival time and departure time for each stop; and 5. Ensure that the marijuana, marijuana plants, or marijuana products are stored in

		the locked compartment specified in subsection (D)(2)(e) and are not visible
A.A.C. R9-17-316(C)(7)	16	C. A dispensary shall establish and implement an inventory control system for the dispensary's medical marijuana and marijuana products that documents: 7. For disposal of medical marijuana or a marijuana product that is not to be dispensed or used for making a marijuana product: a. Description of and reason for the medical marijuana or marijuana product being disposed of including, if applicable: i. The number of failed or other unusable plants, and ii. The results of laboratory testing; b. Date of disposal; c. Method of disposal; and d. Name and registry identification number or license number, as applicable, of the dispensary agent or marijuana facility agent responsible for the disposal
A.A.C. R9-17-320(A)(1)	11	A. A dispensary shall ensure that: 1. Any building or equipment used by a dispensary for the cultivation, harvest, preparation, packaging, storage, infusion, or sale of medical marijuana or marijuana products is maintained in a clean and sanitary condition
A.A.C. R9-17-318(E)	10	E. After transportation, a dispensary agent shall: 1. Enter the end time of the trip and any changes to the trip plan on the trip plan required in subsection (C)(1), and 2. Ensure that the updated trip plan is provided to the dispensary
A.A.C. R9-17-318(C)(1)	10	C. Before transportation, a dispensary agent shall: 1. Complete a trip plan that includes: a. The name of the dispensary agent in charge of transporting the marijuana, marijuana plants, marijuana products, or marijuana paraphernalia; b. The date and start time of the trip; c. A description of the marijuana, marijuana plants, marijuana products, or marijuana paraphernalia being transported; d. Any anticipated stops during the trip, including the locations of the stops and arrival time and departure time for each location; and e. The anticipated route of transportation
A.A.C. R9-17-320(A)(4)	8	A. A dispensary shall ensure that: 4. All trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, canning, packaging, or other processes are cleaned daily

A.A.C. R9-17-317.01(B)(2)	8	B. A dispensary shall ensure that: 2. Except as provided in subsection (D), only one sample of each batch of medical marijuana or marijuana product is collected according to ANSI/ASQ Standard Z1.4 (2018), General Inspection Level II, incorporated by reference, including no future editions, and available at https:// asq.org/quality-resources/z14-z19, including: a. Use, as applicable, of one of the following sampling methods: i. Top, middle, and bottom sampling using a sample thief, a device consisting of two nested tubes with one or more aligned slots through which a sample may be collected and then sealed into the inner tube by rotating the outer tube; ii. Star pattern sampling from the top, middle, and bottom of each storage container; iii. Collecting discrete incremental units of a batch, such as every tenth unit or every twentieth drop; or iv. Quartering until the sample reaches the size specified in subsection (B)(3); and b. For sampling methods specified in subsections (B)(2)(a)(i) through (iii), quartering the volume of the aggregated portions collected to obtain the sample size specified in subsection (B)(3)
---------------------------	---	---

Appendix 5 Top Citations Across Retail Locations

Row Labels	Count of Item #	Citation Text
A.A.C. R9-18-310(A)(2)(h)	51	A. A marijuana establishment shall ensure that marijuana or a marijuana product provided by the marijuana establishment's retail site to a consumer: 2. Is labeled with: h. As required by A.R.S. § 36-2854.01, a quick response code linking to a webpage that contains the following: i. The strain of the marijuana; ii. The following statement: Using marijuana during pregnancy could cause birth defects or other health issues to your unborn child; iii. Distribution chain information, including: (1) The name of the marijuana establishment; (2) If not cultivated by the marijuana establishment, the name and the license number or registry identification number, as applicable, of the marijuana establishment or dispensary that cultivated the marijuana; and (3) If not infused or prepared for sale by the marijuana establishment, the name and the license number or registry identification number, as applicable, of the marijuana establishment or dispensary that infused or prepared the marijuana product for sale; iv. A link to the final report of testing marijuana or a marijuana product, specified in R9-18-410(B)(3), from a marijuana testing facility; v. If applicable, the method used to extract tetrahydrocannabinol from the marijuana; and vi. The date of: (1) Harvest of the marijuana; and (2) If applicable, manufacture of the marijuana product
A.A.C. R9-18-314(D)(1)	44	D. The individual designated in subsection (A) shall conduct and document an audit of the marijuana establishment's inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. 1. If the audit identifies a reduction in the amount of marijuana or a marijuana product in the marijuana establishment's inventory not due to documented causes, the marijuana establishment shall determine and document where the loss has occurred and take and document corrective action.
A.A.C. R9-18-312(I)(1)(c)	31	I. To prevent unauthorized access to marijuana or a marijuana product at the marijuana establishment's retail site and, if applicable, the marijuana establishment's cultivation site or manufacturing site, the marijuana establishment shall have the following: 1. Security equipment to deter and prevent unauthorized entrance into limited access areas that include: c. Electronic monitoring including: i. At least one 19-inch or greater call-up monitor; ii. A printer capable of immediately producing a clear still photo from any video camera image; iii. Video cameras: (1) Providing coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of

		identifying any activity occurring in or adjacent to the building; and (2) Having a recording resolution of at least 704 x 480 or the equivalent; iv. A video camera at each point of sale location within the marijuana establishment's retail site allowing for the identification of any consumer purchasing marijuana or a marijuana product; v. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions; vi. Storage of video recordings from the video cameras for at least 30 calendar days; vii. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and viii. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage
A.A.C. R9-18-312(D)(1)	18	D. Before transportation, a marijuana facility agent of a marijuana establishment shall: 1. Complete a trip plan that includes: a. The name of the marijuana facility agent in charge of transporting the marijuana, marijuana plants, or marijuana products; b. The license plate number of the vehicle being used to transport the marijuana, marijuana plants, or marijuana products; c. The date and start time of the trip; d. A description of the marijuana, marijuana plants, or marijuana products being transported; e. Any anticipated stops during the trip, including the locations of the stops and estimated arrival time and departure time for each location; and f. The anticipated route of transportation
A.A.C. R9-18-313(A)(4)	17	A. A marijuana establishment that prepares, sells, or otherwise transfers marijuana-infused edible food products shall: 4. If a marijuana establishment sells or otherwise transfers marijuana-infused edible food products, ensure that the marijuana-infused edible food products: a. Are sold or otherwise transferred according to applicable requirements in 9 A.A.C. 8, Article 1; b. In compliance with A.R.S § 36-2854(A)(7), contain no more total tetrahydrocannabinol than: i. 10 mg of per serving; or ii. 100 mg per package; and c. If packaged as more than one serving, are: i. Scored or otherwise delineated into standard serving size, and ii. Of homogeneous consistency to ensure uniform disbursement of total tetrahydrocannabinol throughout the edible food product
A.A.C. R9-18-312(E)(2)	15	E. During transportation, a marijuana facility agent shall: 2. Use a vehicle that has a current registration with the Arizona Department of Motor Vehicles, issued according to A.R.S. Title 28, Chapter 7, Article 2: a. Without any marijuana identification; b. Equipped with a global positioning system or other means for the marijuana establishment to track the current location of the vehicle at any point in time; Capable of providing electronic information about where the vehicle has been during at least the previous 90 days; d. With operational video surveillance and recording equipment that: i. Shows the interior of the vehicle, including the driver's seat and location of the marijuana, marijuana plants, or marijuana products

		being transported; ii. Is turned on for the duration of a trip while marijuana or a marijuana product is in the vehicle; and iii. Either stores the recording for at least 30 calendar days or transmits the recorded images at the time of recording to another location, where the recorded images are stored for at least 30 calendar days; and e. With a locked compartment in which any marijuana, marijuana plants, or marijuana products being transported may be stored during a trip
--	--	---