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8 *Bureau of Cannabis Control*

EXEMPT FROM FILING FEES
GOV. CODE, § 6103

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES
11 NORTH VALLEY DISTRICT – CHATSWORTH COURTHOUSE
12

13 **CALIFORNIA DEPARTMENT OF**
14 **PUBLIC HEALTH AND BUREAU**
15 **OF CANNABIS CONTROL,**

16 Plaintiffs,

17 v.

18 **VERTICAL BLISS, INC., KUSHY**
PUNCH, INC., CONGLOMERATE
19 **MARKETING, LLC, MORE**
AGENCY, INC., RUBEN KACHIAN
20 **aka RUBEN CROSS, ARUTYUN**
BARSAMYAN, KEVIN HALLORAN,
21 **MIKE A. TOROYAN, and DOES 1**
22 **through 30, inclusive,**

23 Defendants
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Case No. 20CHCV00560

**DECLARATION OF ETHAN TURNER IN
SUPPORT OF MOTION TO COMPEL
RESPONSES AND REQUEST FOR
SANCTIONS**

Date: January 10, 2022
Time: 8:30 a.m.
Dept: F49
Judge: The Honorable Stephen P. Pfahler

Trial Date: June 13, 2022
Action Filed: September 23, 2020

RESERVATION NO. 260057874604

1 I, Ethan Turner declare as follows:

2 1. I am an attorney duly licensed to practice law before the Courts of the State of
3 California. I am a Deputy Attorney General assigned to represent the plaintiffs in the above
4 entitled matter. I have personal knowledge of the information set forth herein below, all of which
5 is true and correct of my own personal knowledge that the following evidence, declarations,
6 exhibits, and writings are true and correct. If called as a witness in this proceeding I could
7 truthfully testify to the following:

8 2. On June 14, 2021, the Plaintiffs in this matter, California Department of Public
9 Health and the Bureau of Cannabis Control (collectively, Plaintiffs) propounded Form
10 Interrogatories, Set One, and Requests for Admission, Set One, on Defendant Ruben Kachian.
11 True and correct copies of these documents are attached hereto as Exhibits 1 and 2, respectively.

12 3. On July 19, 2021, a three-week extension on the due date for discovery responses
13 was agreed to, making the due date August 9, 2021. A true and correct copy of the email
14 exchange requesting and granting the extension is attached hereto as Exhibit 3.

15 4. On August 4, 2021, counsel for Ruben Kachian, Margarita Salazar (Salazar),
16 requested a thirty-day extension to provide responses. On August 5, 2021, Plaintiffs agreed to
17 extend the date for responses to September 8, 2021. A true and correct copy of the email
18 exchange requesting and granting the extension is attached hereto as Exhibit 4.

19 5. On September 9, 2021, I sent an email to Salazar asking about the status of the
20 discovery responses. A true and correct copy of the email is attached hereto as Exhibit 5.

21 6. On September 15, 2021, having still not received any response from Salazar, I sent an
22 email to Salazar inquiring about the status of Defendant Kachian's overdue responses. A true and
23 correct copy of the email is attached hereto as Exhibit 6.

24 7. On September 20, 2021, having still not received any response from Salazar, I sent an
25 email to Salazar inquiring about the status of Defendant Kachian's overdue responses. A true and
26 correct copy of the email is attached hereto as Exhibit 7.

27 8. On October 4, 2021, Salazar replied via email to the September 9, 2021 email but
28 did not provide a response regarding the status of the outstanding discovery request. A true and

1 correct copy of the email is attached hereto as Exhibit 8.

2 9. On October 4, 2021, I sent a letter, via email and first class mail, to Salazar
3 regarding the outstanding discovery, the failure to respond to the inquiry regarding discovery, a
4 reminder that discovery responses for the individuals that Salazar indicated she would be
5 representing were due on October 18, and asked to meet and confer regarding outstanding issues.
6 A true and correct copy of the letter is attached hereto as Exhibit 9.

7 10. On October 4, 2021, Salazar acknowledged receipt of the email that had the letter
8 attached. A true and correct copy of the email is attached hereto as Exhibit 10.

9 11. On November 3, 2021, having still not received any response to the Meet and
10 Confer Letter or the outstanding responses, I again followed up with Salazar. A true and correct
11 copy of the email is attached hereto as Exhibit 11.

12 12. As of today, November 14, 2021, Defendant Kachian has yet to provide any
13 substantive response to Plaintiffs' Meet and Confer Letter, which was originally sent on October
14 4, 2021.

15 13. Plaintiffs have requested that the Court award \$5,455.00 in sanctions, the request
16 is based on the number of hours worked by myself, my supervisor and our legal support staff as a
17 direct consequence of Kachian's failure to respond to discovery requests as required by law and
18 in seeking an order compelling responses.

19 14. While several attorneys are assigned to and work on this case, three Department of
20 Justice staff members have participated in the attempt to resolve this discovery matter and to seek
21 an order to compel discovery: Senior Assistant Attorney General Harinder Kapur, Senior Legal
22 Analyst Helen Koh, and myself.

23 a. Senior Assistant Attorney General Harinder Kapur hourly billing rate is
24 \$220. Ms. Kapur undertook 4.5 hours of work as a consequence of Defendant Kachian's
25 failure to respond to discovery requests. The cost of Ms. Kapur's work to the clients
26 amounted to \$990.00.

27 b. Senior Legal Analyst Helen Koh has an hourly billing rate of \$205 per
28 hour. Ms. Koh worked 3 hours as a consequence of Kachian's failure to respond to

1 Plaintiffs' discovery requests and her total billing for such work amounts to \$615.00.

2 c. I billed for 1.25 hours in my efforts to contact with Kachian's attorney and
3 spent 15 hours preparing the motion to compel discovery responses. My hourly rate is
4 \$220 per hour, so the total costs incurred for the work which I have had to undertake to
5 date as a consequence of Kachian's refusal to respond to Plaintiffs' discovery requests
6 amounts to \$3,300.

7 d. Collectively, as of the date of this filing, \$4,795.00 in legal service fees
8 were incurred in attempting to elicit required discovery responses.

9 15. The Office of the Attorney General maintains time records in a central computer
10 system. Attorneys directly input their time into preset descriptive categories listed in the
11 timekeeping software. Attached to this Declaration as Exhibit 12 is a true and correct copy of the
12 statement for attorney services rendered for this matter prepared at my request by the Department
13 of Justice, Office of the Attorney General. Attorney/client privileged information, attorney work
14 product, and descriptions of work performed that is unrelated to the motion compel discovery
15 have been redacted from the report. Where entire entries are redacted we are not requesting to
16 recover for that entry. Therefore, the total attorney and legal analyst hours reflected in the
17 "Transaction Detail for Matter(s): SA2020800072" Report for which compensation is sought 22.5
18 hours, plus the anticipated time discussed below. The smallest increment of time used by the
19 California Department of Justice, Office of the Attorney General, to bill its clients is 0.25,
20 referring to 15 minutes or less. I have reviewed the report for accuracy.

21 16. I intend to appear remotely at the hearings reserved for January 10, 2022 and
22 anticipate it will require an additional two hours of billable hours reviewing any opposition and
23 preparation for the hearing and that the hearing itself, including time waiting for our case to be
24 called will result in another hour of billable time as a consequence of the Defendant's failure to
25 provide responses to discovery or meet and confer to resolve this issue. This anticipated sum will,
26 probably be less than that which will actually be incurred, and if this turns out to be a significant
27 underestimation, a supplemental declaration with documentation will be filed ahead of the
28 hearing. This anticipated time brings the total costs that will be incurred by Plaintiffs by the time

1 of the hearing as a consequence of Defendant's failure to respond to discovery requests and
2 failure to meet and confer to \$5,455.00.

3 This declaration is executed under penalty of perjury under the laws of the State of
4 California this 14th day of November, 2021, at Rancho Cordova, California.

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8 ETHAN A. TURNER
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EXHIBIT 1

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Ethan A. Turner (SBN 294891), Patrick Boyne (SBN 279667) Office of the Attorney General 1300 I Street, Sacramento, CA 95814 TELEPHONE NO.: (916) 210-7898 FAX NO. (Optional): E-MAIL ADDRESS (Optional): Patrick.Boyne@doj.ca.gov ATTORNEY FOR (Name): Plaintiffs California Department of Public Health, et al.	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles	
SHORT TITLE OF CASE: California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.	
FORM INTERROGATORIES—GENERAL Asking Party: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH Answering Party: RUBEN KACHIAN AKA RUBEN CROSS Set No.: ONE	CASE NUMBER: 20CHCV00560

Sec. 1. Instructions to All Parties

- | | |
|---|--|
| (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.
(b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
(c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection. | (c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
(d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
(e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
(f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
(g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
(h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers: |
|---|--|

Sec. 2. Instructions to the Asking Party

- | | |
|--|---|
| (a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, <i>Form Interrogatories—Limited Civil Cases (Economic Litigation)</i> (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.
(b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
(c) You may insert your own definition of INCIDENT in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.
(d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.
(e) Additional interrogatories may be attached. | (a) (Check one of the following):
<input checked="checked" type="checkbox"/> (1) INCIDENT includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding. |
|--|---|

Sec. 3. Instructions to the Answering Party

- (a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(Date) _____

(SIGNATURE) _____

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

- (a) (Check one of the following):

- ☒ (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

☐ (2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)");

- (b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.
- (c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.
- (d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.
- (e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).
- (f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002] Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

- ☒ 1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information individual—

- ☒ 2.1 State:
 - (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- ☒ 2.2 State the date and place of your birth.
- ☐ 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☐ 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☒ 2.5 State:
 - (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- ☒ 2.6 State:
 - (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- ☒ 2.7 State:
 - (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- ☒ 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
 - (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- ☒ 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- ☒ 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

☒ 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:

- (a) the name, **ADDRESS**, and telephone number of that **PERSON**; and
- (b) a description of your duties.

☐ 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature of the disability or condition; and
- (c) the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.

☐ 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature or description of each substance;
- (c) the quantity of each substance used or taken;
- (d) the date and time of day when each substance was used or taken;
- (e) the **ADDRESS** where each substance was used or taken;
- (f) the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
- (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

☐ 3.1 Are you a corporation? If so, state:

- (a) the name stated in the current articles of incorporation;
- (b) all other names used by the corporation during the past 10 years and the dates each was used;
- (c) the date and place of incorporation;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.

☐ 3.2 Are you a partnership? If so, state:

- (a) the current partnership name;
- (b) all other names used by the partnership during the past 10 years and the dates each was used;
- (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;
- (d) the name and **ADDRESS** of each general partner; and
- (e) the **ADDRESS** of the principal place of business.

☐ 3.3 Are you a limited liability company? If so, state:

- (a) the name stated in the current articles of organization;
- (b) all other names used by the company during the past 10 years and the date each was used;
- (c) the date and place of filing of the articles of organization;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.

☐ 3.4 Are you a joint venture? If so, state:

- (a) the current joint venture name;
- (b) all other names used by the joint venture during the past 10 years and the dates each was used;
- (c) the name and **ADDRESS** of each joint venturer; and
- (d) the **ADDRESS** of the principal place of business.

☐ 3.5 Are you an unincorporated association? If so, state:

- (a) the current unincorporated association name;
- (b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and
- (c) the **ADDRESS** of the principal place of business.

☐ 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:

- (a) the name;
- (b) the dates each was used;
- (c) the state and county of each fictitious name filing; and
- (d) the **ADDRESS** of the principal place of business.

☐ 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:

- (a) Identify the license or registration;
- (b) state the name of the public entity; and
- (c) state the dates of issuance and expiration.

4.0 Insurance

☒ 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:

- (a) the kind of coverage;
- (b) the name and **ADDRESS** of the insurance company;
- (c) the name, **ADDRESS**, and telephone number of each named insured;
- (d) the policy number;
- (e) the limits of coverage for each type of coverage contained in the policy;
- (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
- (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.

☒ 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

☐ 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).

☐ 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

☐ 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:

- (a) a description;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

☐ 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

☐ 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- (a) the name;
- (b) the **PERSON** who prescribed or furnished it;
- (c) the date it was prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

☐ 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each provider.

☐ 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- (b) the complaints for which the treatment was advised; and
- (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

☐ 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- (a) describe the property;
- (b) describe the nature and location of the damage to the property;

(c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and

(d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

☐ 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- (c) the amount of damage stated.

☐ 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- (a) the date repaired;
- (b) a description of the repair;
- (c) the repair cost;
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

☐ 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

☐ 8.2 State:

- (a) the nature of your work;
- (b) your job title at the time of the **INCIDENT**; and
- (c) the date your employment began.

☐ 8.3 State the last date before the **INCIDENT** that you worked for compensation.

☐ 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

☐ 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

☐ 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

☐ 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

☐ 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- (a) the facts upon which you base this contention;
- (b) an estimate of the amount;
- (c) an estimate of how long you will be unable to work; and
- (d) how the claim for future income is calculated.

9.0 Other Damages

- ☐ 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- (a) the nature;
 - (b) the date it occurred;
 - (c) the amount; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.
- ☐ 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- ☐ 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:
- (a) a description of the complaint or injury;
 - (b) the dates it began and ended; and
 - (c) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.
- ☐ 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. *(You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.)*
- ☐ 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:
- (a) the date and the place it occurred;
 - (b) the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
 - (c) the nature of any injuries you sustained;
 - (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
 - (e) the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- ☐ 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:
- (a) the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
 - (b) the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- (c) the court, names of the parties, and case number of any action filed;
- (d) the name, **ADDRESS**, and telephone number of any attorney representing you;
- (e) whether the claim or action has been resolved or is pending; and
- (f) a description of the injury.

- ☐ 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:
- (a) the date, time, and place of the **INCIDENT** giving rise to the claim;
 - (b) the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
 - (c) the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
 - (d) the period of time during which you received workers' compensation benefits;
 - (e) a description of the injury;
 - (f) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
 - (g) the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- ☐ 12.1 State the name, **ADDRESS**, and telephone number of each individual:
- (a) who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
 - (b) who made any statement at the scene of the **INCIDENT**;
 - (c) who heard any statements made about the **INCIDENT** by any individual at the scene; and
 - (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).
- ☐ 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
 - (b) the date of the interview; and
 - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- ☐ 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
 - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
 - (c) the date the statement was obtained; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

☐ 12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

☐ 12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

☐ 12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

☐ 12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

☐ 13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

☐ 13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

☐ 14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

☐ 14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

☒ 15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

☐ 16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:

- (a) identify it;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:

- (a) identify each service;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:

- (a) identify each cost;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:

- (a) identify each part of the loss;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:

- (a) identify each item of property damage;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:

- (a) identify each cost item; state all facts upon which you base your contention;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:

- (a) the source of each **DOCUMENT**;
- (b) the date each claim arose;
- (c) the nature of each claim; and
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☐ 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310)? If so, for each plaintiff state:

- (a) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
- (b) a description of each **DOCUMENT**; and
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

17.0 Responses to Request for Admissions

☒ 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

18.0 *[Reserved]*

19.0 *[Reserved]*

20.0 How the Incident Occurred—Motor Vehicle

☐ 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).

☐ 20.2 For each vehicle involved in the **INCIDENT**, state:

- (a) the year, make, model, and license number;
- (b) the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.

☐ 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.

☐ 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.

☐ 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.

☐ 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.

☐ 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:

- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.

☐ 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:

- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.

☐ 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and

- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.

25.0 [Reserved]

30.0 [Reserved]

40.0 [Reserved]

50.0 Contract

☐ 50.1 For each agreement alleged in the pleadings:

- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.

☐ 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.

☐ 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.

☐ 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.

☐ 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.

☐ 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

60.0 [Reserved]

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
Case No.: **20CHCV00560**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On June 14, 2021, I served the attached **FORM INTERROGATORIES – GENERAL, SET ONE TO RUBEN KACHIAN AKA RUBEN CROSS** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Ivy A. Wang
David J. Carroll
Browne, George, Ross, O'Brien,
Annaguey, and Ellis LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on June 14, 2021, at Sacramento, California.

K. Oleynik
Declarant


Signature

EXHIBIT 2

1 ROB BONTA
Attorney General of California
2 HARINDER KAPUR
Senior Assistant Attorney General
3 ETHAN A. TURNER
Deputy Attorney General
4 State Bar No. 294891
PATRICK BOYNE
5 Deputy Attorney General
State Bar No. 279667
6 1300 I Street, Suite 125
P.O. Box 944255
7 Sacramento, CA 94244-2550
Telephone: (916) 210-7898
8 E-mail: Ethan.Turner@doj.ca.gov
E-mail: Patrick.Boyne@doj.ca.gov
9 *Attorneys for Plaintiffs California Department of
Public Health and Bureau of Cannabis Control*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 NORTH VALLEY DISTRICT - CHATSWORTH COURTHOUSE

15 **CALIFORNIA DEPARTMENT OF
16 PUBLIC HEALTH AND BUREAU OF
17 CANNABIS CONTROL,**

18 Plaintiffs,

19 **v.**

20 **VERTICAL BLISS, INC., KUSHY
21 PUNCH, INC., CONGLOMERATE
MARKETING, LLC, MORE AGENCY,
22 INC., RUBEN KACHIAN aka RUBEN
CROSS, ARUTYUN BARSAMYAN,
23 KEVIN HALLORAN, MIKE A.
TOROYAN, and DOES 1 through 30,
24 inclusive,**

25 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT RUBEN KACHIAN aka
RUBEN CROSS, SET ONE**

Dept: F49
Judge: Hon. Stephen P. Pfahler

Trial Date: TBD
Action Filed: September 23, 2020

1 PROPOUNDED BY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH
2 RESPONSES BY: RUBEN KACHIAN aka RUBEN CROSS
3 SET: ONE

4
5 Plaintiff California Department of Public Health requests that Defendant Ruben Kachian
6 aka Ruben Cross answer under oath, pursuant to Code of Civil Procedure section 2033.010, et
7 seq., the following Requests for Admission:

8 **DEFINITIONS**

9 1. "YOU" refers to Responding Party.
10 2. "OWNER" refers to; (1) person with an aggregate ownership interest of 20 percent or
11 more in the person required to hold a COMMERCIAL CANNABIS LICENSE or a licensee,
12 unless the interest is solely a security, lien, or encumbrance; (2) the chief executive officer of a
13 nonprofit or other entity; (3) a member of the board of directors of a nonprofit; (4) the trustee(s)
14 and all persons who have control of the trust and/or the commercial cannabis business that is held
15 in trust; (5) an individual entitled to a share of at least 20 percent of the profits of the commercial
16 cannabis business; or (6) an individual who will be participating in the direction, control, or
17 management of the person required to hold a COMMERCIAL CANNABIS LICENSE, including
18 a general partner of a commercial cannabis business that is organized as a partnership, a non-
19 member manager or managing member of a commercial cannabis business that is organized as a
20 limited liability company, and an officer or director of a commercial cannabis business that is
21 organized as a corporation, as identified in Business and Professions Code section 26001,
22 subdivision (al), Cal. Code Regs., tit. 16, section 5003, and Cal. Code Regs., tit. 17, section
23 40102, subdivision (a).

24 3. "SUPERVISOR" refers to an individual having authority, in the interest of the party
25 required to hold a COMMERCIAL CANNABIS LICENSE, to hire, transfer, suspend, lay off,
26 recall, promote, discharge, assign, reward, or discipline other employees, or responsibility to
27 direct them or to adjust their grievances, or effectively to recommend such action, if, in
28 connection with the foregoing, the exercise of that authority is not of a merely routine or clerical

1 nature, but requires the use of independent judgment, as identified in Business and Professions
2 Code section 26051.5 subdivision (a)(5)(C).

3 4. "FINANCIAL INTEREST HOLDER" refers to persons that hold an ownership interest
4 of less than 20 percent in a commercial cannabis business, and are not otherwise specified as
5 OWNERS, but not; (1) a bank or financial institution whose interest constitutes a loan; (2)
6 persons whose only ownership interest in the commercial cannabis business is through an interest
7 in a diversified mutual fund, blind trust, or similar instrument; (3) persons whose only financial
8 interest is a security interest, lien, or encumbrance on the property that will be used by the
9 commercial cannabis business; or (4) persons who hold a share of stock that is less than 5 percent
10 of the total shares in a publicly traded company, as identified in Cal. Code Regs., tit. 17, section
11 40102, subdivision (a) and (b).

12 REQUESTS FOR ADMISSION

13 **REQUEST FOR ADMISSION NO. 1:**

14 Admit that YOU were the Chief Executive Officer of Vertical Bliss, Inc. in the period
15 from April 23, 2018 to October 2, 2019.

16 **REQUEST FOR ADMISSION NO. 2:**

17 Admit that YOU were a Managing Member of Conglomerate Management, LLC in the
18 period from April 23, 2018 to October 2, 2019.

19 **REQUEST FOR ADMISSION NO. 3:**

20 Admit that YOU were the Chief Executive Officer of More Agency, Inc. in the period
21 from April 23, 2018 to October 2, 2019.

22 **REQUEST FOR ADMISSION NO. 4:**

23 Admit that YOU were the Secretary of More Agency, Inc. in the period from April 23,
24 2018 to October 2, 2019.

25 **REQUEST FOR ADMISSION NO. 5:**

26 Admit that YOU were the Chief Financial Officer of More Agency, Inc. in the period
27 from April 23, 2018 to October 2, 2019.

28 ///

REQUEST FOR ADMISSION NO. 6:

Admit that YOU were the Sole Director of More Agency, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 7:

Admit that YOU were the Chief Executive Officer of Kushy Punch, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 8:

Admit that YOU were an OWNER of Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU were a FINANCIAL INTEREST HOLDER of Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU were an OWNER of Kushy Punch, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU were a SUPERVISOR of Kushy Punch, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU were a FINANCIAL INTEREST HOLDER of Kushy Punch, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU were an OWNER of More Agency, Inc. in the period from April 23, 2018 to October 2, 2019.

///

REQUEST FOR ADMISSION NO. 15:

Admit that YOU were a SUPERVISOR of More Agency, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU were a FINANCIAL INTEREST HOLDER of More Agency, Inc. in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU were an OWNER of Conglomerate Marketing, LLC in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 18:

Admit that YOU were a SUPERVISOR of Conglomerate Marketing, LLC in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 19:

Admit that YOU were a FINANCIAL INTEREST HOLDER of Conglomerate Marketing, LLC in the period from April 23, 2018 to October 2, 2019.

Dated: June 14, 2021

Respectfully Submitted,

ROB BONTA
Attorney General of California
HARINDER KAPUR
Senior Assistant Attorney General

Patrick Boyne

PATRICK BOYNE
Deputy Attorney General
*Attorneys for Plaintiffs California
Department of Public Health and Bureau
of Cannabis Control*

SA2020800072
RFA Kachian.docx

EXHIBIT 3

Ethan Turner

From: Ethan Turner
Sent: Monday, July 19, 2021 11:06 AM
To: 'David J. Carroll'; 'iwang@bgrfirm.com'
Cc: Harinder Kapur; Patrick Boyne
Subject: Discovery

ProfiledItem: true

David and Ivy,

Pursuant to our earlier discussions, we agree to a three week (from today's date) extension of the Defendants' deadline for written discovery responses.

Thanks,

Ethan

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



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Ethan Turner

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Thursday, July 15, 2021 3:51 PM
To: Ethan Turner; Patrick Boyne
Cc: Harinder Kapur; Ivy A. Wang
Subject: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]

ProfiledItem: true

Ethan and Patrick,

I hope you are doing well. I wanted to formally ask for the discovery extension that we had previously discussed. Would a three-week extension (until August 9) for Defendants to serve their discovery responses work? Please let me know. Thanks!

David



David J. Carroll | Partner
801 S. Figueroa Street, Suite 2000
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Main 213.725.9800 | Fax 213.725.9808
dcarroll@bgrfirm.com
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EXHIBIT 4

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Cc: [Robert White](#); [Patrick Boyne](#); [Harinder Kapur](#); ["Kevin Knox"](#)
Subject: RE: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]
Date: Thursday, August 5, 2021 10:47:00 AM
Attachments: [image002.png](#)

Ms. Salazar,

I mistakenly typed August 8 below. The 30 day extension makes the new due date for discovery **September 8**.

Also, I wanted to confirm that you only represent Mr. Kachian and do not represent his companies Vertical Bliss or Kushy Punch.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Ethan Turner
Sent: Thursday, August 5, 2021 9:34 AM

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>

Subject: RE: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]

Ms. Salazar,

Discovery responses are currently due August 9, 2021. We have asked for a lot of information and documents, so a 30 day extension to August 8 is okay with us.

Let us know if you would like to discuss the case, the settlement demand previously sent to all defendants, or anything else.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

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1620-18

Sacramento, CA 95814

Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Wednesday, August 4, 2021 2:49 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: David J. Carroll <dcarroll@bgrfirm.com>; Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Ivy A. Wang <iwang@bgrfirm.com>; Kevin Knox <kevin@msalazarlaw.com>
Subject: Re: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]

Hello, Mr. Turner,

My apologies for not responding sooner. We are still trying to work out the going forward details.

We would appreciate a 30 day extension on my client's Responses.

Kindly confirm if you can accommodate this request and the new date taht responses would be due.

Thank you.

--m

Margarita Salazar, Esq.
Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

On Wed, Aug 4, 2021 at 2:41 PM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Thanks David,

I sent Ms. Salazar an email shortly after receiving the substation of attorney and I haven't heard back. We are open to extending the deadline for her client's discovery. If she wishes to discuss the matter, I'm happy to do so.

-Ethan

Ethan Turner
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Ethan,

I would like to introduce you to Margarita Salazar, who is now representing Ruben Kachian. As Margarita is still getting up to speed on the case, please let us know if Ruben Kachian can have a 30-day extension (until Sept. 8) to respond to Plaintiffs' written discovery. Thank you.

David

BGR BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
David J. Carroll | Partner
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Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
dcarroll@bgrfirm.com
www.bgrfirm.com

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--

--m

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470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

EXHIBIT 5

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Cc: [Harinder Kapur](#); [Robert White](#)
Subject: RE: Are you representing the business entity defendants?
Date: Thursday, September 9, 2021 10:11:00 AM

Ms. Salazar,

We have not received any subs regarding the business entity defendants. Any update?

Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Wednesday, August 25, 2021 10:32 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

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Margarita Salazar, Esq.

Law Offices of Margarita Salazar, A Professional Law Corporation

470 Third Avenue, Suite 9

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

On Tue, Aug 24, 2021 at 8:27 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

According to application documents, Mr. Kachian is 97% owner of Kushy Punch and Vertical Bliss. Are you representing these entities as well as Mr. Kachian?

Please advise.

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

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Margarita Salazar, Esq.

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470 Third Avenue, Suite 9

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

EXHIBIT 6

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Subject: RE: Are you representing the business entity defendants?
Date: Wednesday, September 15, 2021 3:36:00 PM

Ms. Salazar,

I'm following up on my email of September 9.

Do you have any update on the status of the discovery requests that were due a week ago?

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
[Sacramento, CA 95814](#)
Office: (916) 210-7898



From: Ethan Turner
Sent: Thursday, September 9, 2021 10:12 AM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: RE: Are you representing the business entity defendants?

Ms. Salazar,

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California Department of Justice
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1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Wednesday, August 25, 2021 10:32 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: Re: Are you representing the business entity defendants?

Yes, I am.

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Thank you.

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Margarita Salazar, Esq.

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470 Third Avenue, Suite 9
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Ethan Turner

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EXHIBIT 7

Ethan Turner

From: Ethan Turner
Sent: Monday, September 20, 2021 2:26 PM
To: 'Margarita Salazar, Esq.'
Cc: Harinder Kapur; Robert White; Helen Koh
Subject: FW: Are you representing the business entity defendants?

Ms. Salazar,

This email is to follow-up on the following:

1. On August 25, you wrote that you were finalizing substitution of attorney documents regarding the business entity defendants owned by Mr. Kachian. Do you have an update on the status of that process?
2. Additionally, on September 9 and September 15, I wrote to you regarding the status of the RFAs, RFPs, and responses to interrogatories that were due on September 8. The RFAs, RFPs, and interrogatory responses were originally due on August 9, 2021, but we agreed to an extension as you were new to the case. I have not received a response from you. Do you have any update on production of the outstanding discovery?.

Thanks and I look forward to hearing from you.

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
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Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Ethan Turner
Sent: Thursday, September 9, 2021 10:12 AM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
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California Department of Justice
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1300 I Street
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Sacramento, CA 95814
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Sent: Wednesday, August 25, 2021 10:32 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

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Please advise.

Thanks,

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EXHIBIT 8

Ethan Turner

From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Monday, October 4, 2021 8:12 AM
To: Ethan Turner
Cc: Harinder Kapur; Robert White; Kevin Knox
Subject: Re: Are you representing the business entity defendants?

EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

All,

Yes, I am representing the business entities EXCEPT "Kushy Punch, Inc." which is NOT an actual entity that is related to these parties. It is my understanding that "kushy punch, inc." is a "brand" with no legal entity attached. My clients do not own the "Kushy Punch Inc." business / entity and it is NOT related to this case.

In any event, I have not been able to get a hold of my clients to get the signatures I need to sub in and now I was unable to register for LA COURT CONNECT so I am not sure if I can attend the meeting. I am trying to call in now.

Either way, I intend to represent the following:

1. Ruben Kachian
2. Arutyan Barsamyan
3. More Agency
4. Mike Torokian
5. Vertical Bliss

Thank you.

--m

On Thu, Sep 9, 2021 at 10:11 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

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Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

1300 I Street

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Wednesday, August 25, 2021 10:32 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: Re: Are you representing the business entity defendants?

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**Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9**

Chula Vista, California 91910

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EXHIBIT 9



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 210-7898
E-Mail: Ethan.Turner@doj.ca.gov

October 4, 2021

Margarita Salazar, Esq.
Law Offices of Margarita Salazar
470 Third Avenue, Ste. 9
Chula Vista, CA 91910-4663

Re: California Department of Public Health, et al. v. Vertical Bliss, Inc. et al.
Los Angeles County Superior Court Case No. 20CHCV00560

Dear Ms. Salazar:

Pursuant to an extension provided to you on August 5, 2021, requests for production, requests for admissions, and interrogatories served on Mr. Kachian were due on September 9, 2021. (Attachment 1.) I have emailed you requesting the status of the production on September 9, September 15, and September 20. (Attachments 2-4.) I also called and left a voice mail for you on or about September 15, asking about the status of discovery responses. To date, you have not responded to any of these inquiries. Finally, this morning, I also asked about the outstanding discovery in an email regarding representation of the corporate and individual defendants. While you responded to the questions regarding Kushy punch, you did not respond to the inquiry regarding the outstanding discovery. (Attachment 5.)

This letter is intended as an invitation to informally resolve this issue and to encourage your client to respond to the discovery that was served on June 14, 2021. In addition, if you are able to secure the signatures of the other defendants for a substitution of attorney, as you have indicated you would, then I would remind you that the discovery responses of the remaining defendants in this case are currently due on October 18, 2021.

You should also know, if you have not already been so informed, that we have been ordered by the Court to begin mediation within 90 days of our July 19, 2021 CMC. Obviously, it would not be possible to complete mediation by that date, but we should discuss selecting a mediator very soon.

Margarita Salazar
October 4, 2021
Page 2

Please contact me by October 8, 2021, so that we can resolve these outstanding issues.

Sincerely,



ETHAN A. TURNER
Deputy Attorney General

For ROB BONTA
 Attorney General

cc: Peggy Campbell, Staff Counsel, Department of Cannabis Control

Attachment 1

August 5, 2021 Email to Salazar

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Cc: [Robert White](#); [Patrick Boyne](#); [Harinder Kapur](#); ["Kevin Knox"](#)
Subject: RE: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]
Date: Thursday, August 5, 2021 10:47:00 AM
Attachments: [image002.png](#)

Ms. Salazar,

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-Ethan

Ethan Turner

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Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

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Kindly confirm if you can accommodate this request and the new date taht responses would be due.

Thank you.

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Thanks David,

I sent Ms. Salazar an email shortly after receiving the substation of attorney and I haven't heard back. We are open to extending the deadline for her client's discovery. If she wishes to discuss the matter, I'm happy to do so.

-Ethan

Ethan Turner
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Subject: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]

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David

BGR BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
David J. Carroll | Partner
801 S. Figueroa Street, Suite 2000
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470 Third Avenue, Suite 9
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Fax: 877.264.4695

Attachment 2

September 9, 2021 Email to Salazar

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Cc: [Harinder Kapur](#); [Robert White](#)
Subject: RE: Are you representing the business entity defendants?
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We have not received any subs regarding the business entity defendants. Any update?

Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Wednesday, August 25, 2021 10:32 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

--m

Margarita Salazar, Esq.

Law Offices of Margarita Salazar, A Professional Law Corporation

470 Third Avenue, Suite 9

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

On Tue, Aug 24, 2021 at 8:27 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

According to application documents, Mr. Kachian is 97% owner of Kushy Punch and Vertical Bliss. Are you representing these entities as well as Mr. Kachian?

Please advise.

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

Division of Civil Law

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--

--m

Margarita Salazar, Esq.

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470 Third Avenue, Suite 9

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

Attachment 3

September 15, 2021 Email to Salazar

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Subject: RE: Are you representing the business entity defendants?
Date: Wednesday, September 15, 2021 3:36:00 PM

Ms. Salazar,

I'm following up on my email of September 9.

Do you have any update on the status of the discovery requests that were due a week ago?

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Ethan Turner
Sent: Thursday, September 9, 2021 10:12 AM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: RE: Are you representing the business entity defendants?

Ms. Salazar,

We have not received any subs regarding the business entity defendants. Any update?

Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Wednesday, August 25, 2021 10:32 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

--m

Margarita Salazar, Esq.

Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9
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On Tue, Aug 24, 2021 at 8:27 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

According to application documents, Mr. Kachian is 97% owner of Kushy Punch and Vertical Bliss. Are you representing these entities as well as Mr. Kachian?

Please advise.

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

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Division of Civil Law

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--

--m

Margarita Salazar, Esq.
Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

Attachment 4

September 20, 2021 Email to Salazar

Ethan Turner

From: Ethan Turner
Sent: Monday, September 20, 2021 2:26 PM
To: 'Margarita Salazar, Esq.'
Cc: Harinder Kapur; Robert White; Helen Koh
Subject: FW: Are you representing the business entity defendants?

Ms. Salazar,

This email is to follow-up on the following:

1. On August 25, you wrote that you were finalizing substitution of attorney documents regarding the business entity defendants owned by Mr. Kachian. Do you have an update on the status of that process?
2. Additionally, on September 9 and September 15, I wrote to you regarding the status of the RFAs, RFPs, and responses to interrogatories that were due on September 8. The RFAs, RFPs, and interrogatory responses were originally due on August 9, 2021, but we agreed to an extension as you were new to the case. I have not received a response from you. Do you have any update on production of the outstanding discovery?.

Thanks and I look forward to hearing from you.

Ethan Turner

Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Ethan Turner
Sent: Thursday, September 9, 2021 10:12 AM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: RE: Are you representing the business entity defendants?

Ms. Salazar,

We have not received any subs regarding the business entity defendants. Any update?

Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner
Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Wednesday, August 25, 2021 10:32 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

--m

Margarita Salazar, Esq.
Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

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Ms. Salazar,

According to application documents, Mr. Kachian is 97% owner of Kushy Punch and Vertical Bliss. Are you representing these entities as well as Mr. Kachian?

Please advise.

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

Division of Civil Law

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--
--m
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470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

Attachment 5

October 4, 2021 Email to Salazar

Ethan Turner

From: Ethan Turner
Sent: Monday, October 4, 2021 8:39 AM
To: Margarita Salazar, Esq.
Cc: Harinder Kapur; Robert White; Kevin Knox
Subject: Re: Are you representing the business entity defendants?

Thank you Ms. Salazar.

We look forward to seeing the signed substitution documents.

Kushy Punch is an entity registered with the California Secretary of State (Entity No. C3683506). Your client, Arutyan Barsamyan is listed as the CEO, CFO, and Secretary.

Also, have you received my previous emails regarding Kachian's discovery deadline?

Thanks,

Ethan Turner

Deputy Attorney General III
California Department of Justice
Office of the Attorney General
Division of Civil Law
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1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



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From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Monday, October 4, 2021 8:11 AM
To: Ethan Turner
Cc: Harinder Kapur; Robert White; Kevin Knox
Subject: Re: Are you representing the business entity defendants?

EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

All,

Yes, I am representing the business entities EXCEPT "Kushy Punch, Inc." which is NOT an actual entity that is related to these parties. It is my understanding that "kushy punch, inc." is a "brand" with no legal entity attached. My clients do not own the "Kushy Punch Inc." business / entity and it is NOT related to this case.

In any event, I have not been able to get a hold of my clients to get the signatures I need to sub in and now I was unable to register for LA COURT CONNECT so I am not sure if I can attend the meeting. I am trying to call in now.

Either way, I intend to represent the following:

1. Ruben Kachian
2. Arutyan Barsamyan
3. More Agency
4. Mike Torokian
5. Vertical Bliss

Thank you.

--m

On Thu, Sep 9, 2021 at 10:11 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

We have not received any subs regarding the business entity defendants. Any update?

Additionally, as I hope you are aware, Mr. Kachian's discovery responses were due yesterday. Please let us know the status of those responses.

Thanks,

Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

1300 I Street

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Wednesday, August 25, 2021 10:32 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: Re: Are you representing the business entity defendants?

Yes, I am.

I am finalizing the subs today.

Thank you.

--m

Margarita Salazar, Esq.

**Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9**

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

On Tue, Aug 24, 2021 at 8:27 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

According to application documents, Mr. Kachian is 97% owner of Kushy Punch and Vertical Bliss. Are you representing these entities as well as Mr. Kachian?

Please advise.

Thanks,

Ethan Turner

Deputy Attorney General III
California Department of Justice
Office of the Attorney General
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--

--m

Margarita Salazar, Esq.

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470 Third Avenue, Suite 9

Chula Vista, California 91910

Cell / Text: 619.994.9578

Fax: 877.264.4695

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--m
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470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

EXHIBIT 10

Ethan Turner

From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Monday, October 4, 2021 4:57 PM
To: Ethan Turner
Cc: Harinder Kapur; Robert White; Helen Koh
Subject: Re: 10_4 Letter to Salazar with Attachments.pdf

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Thank you.

--m

On Mon, Oct 4, 2021 at 4:05 PM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

Please find attached a letter regarding the outstanding discovery situation.

The same will be mailed to your office today.

Thanks,

Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

1300 I Street

1620-18

Sacramento, CA 95814

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--
--m
Margarita Salazar, Esq.
Law Offices of Margarita Salazar, A Professional Law Corporation
470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

EXHIBIT 11

Ethan Turner

From: Ethan Turner
Sent: Wednesday, November 3, 2021 12:26 PM
To: 'Margarita Salazar, Esq.'
Subject: RE: 10_4 Letter to Salazar with Attachments.pdf

ProfiledItem: true

Ms. Salazar,

I have not heard back from you regarding the outstanding written discovery or on your efforts to substitute in as counsel for the entity defendants. Please advise.

Additionally, I was also wondering if you are amenable to electronic service for all purposes in this case. We are. I much prefer to send and receive all documents via email and would rather not receive any physical mail.

Would you agree to electronic service in matter related to this case?

Thanks,

-Ethan

Ethan Turner
Deputy Attorney General
California Department of Justice
Office of the Attorney General
Division of Civil Law
Cannabis Control Section
1300 I Street
1620-18
Sacramento, CA 95814
Office: (916) 210-7898



From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Monday, October 4, 2021 4:57 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>; Helen Koh <Helen.Koh@doj.ca.gov>
Subject: Re: 10_4 Letter to Salazar with Attachments.pdf

EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Thank you.

--m

On Mon, Oct 4, 2021 at 4:05 PM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

Please find attached a letter regarding the outstanding discovery situation.

The same will be mailed to your office today.

Thanks,

Ethan Turner

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

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Sacramento, CA 95814

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--m
Margarita Salazar, Esq.
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470 Third Avenue, Suite 9
Chula Vista, California 91910
Cell / Text: 619.994.9578
Fax: 877.264.4695

EXHIBIT 12



Transaction Detail for Matter(s): SA2020800072

From Oct 4, 2021 to Nov 10, 2021

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Harinder K. Kapur	Attorney						
		11/8/21	Gen-07	Pleading Preparation	Work on Motion to Compel and Dec. of DAG Turner; discuss with DAG Turner.	4.50	\$990.00
Harinder K. Kapur - Total						4.75	\$1,045.00
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Helen Koh	Paralegal						
		11/8/21	Gen-12	Discovery-Offensive	E-mail exchanges with DAG Turner and SAAG Kapur regarding exhibits for motion to compel discovery; preparation of electronic exhibits and slip sheets; review of local court rules for e-filing requirements	3.00	\$615.00
Helen Koh - Total						4.75	\$973.75
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney	10/4/21	Gen-06	Communication with Other Party	Drafted letter regarding delinquent discovery and to document prior email correspondence and phone calls in order to set up for compelling discovery. Sent draft to SAAG, made final edits, emailed to opposing counsel and sent to secretary for mailing.	1.25	\$275.00



Transaction Detail for Matter(s): SA2020800072

From Oct 4, 2021 to Nov 10, 2021

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney						
		11/1/21					
		11/2/21					
		11/3/21	Gen-07	Pleading Preparation	Collected and printed relevant emails and letter related to meet and confer efforts and wrote draft memorandum points and authorities in support of Motion to Compel Discovery Responses and Request for Sanctions	3.25	\$715.00



Transaction Detail for Matter(s): SA2020800072

From Oct 4, 2021 to Nov 10, 2021

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney	11/4/21	Gen-07	Pleading Preparation	Continued to work on documents for motion to compel discovery.	1.75	\$385.00
		11/4/21	Gen-32	Case Management	Reviewed local rules for noticed motions and learned the reservation system, and reserved a hearing for the motion to compel discovery and request for sanctions.	1.25	\$275.00
		11/5/21	Gen-07	Pleading Preparation	Continued to work on notice, motion, points and authorities in support of motion, meet and confer declaration, declaration of costs, and exhibits for motion to compel discovery responses.	1.25	\$275.00
		11/8/21	Gen-12	Discovery-Offensive	Spoke on telephone with SAAG regarding motion compel discovery responses and request for sanctions. Reviewed edits to Notice, Motion, and Points and Authorities and corresponded with SLA regarding exhibits for declaration.	2.25	\$495.00
		11/9/21	Gen-07	Pleading Preparation	Notified clients that motion to compel was nearly ready to file, spoke with SAAG regarding motion to compel. Made additional revisions and edits to motion documents and declaration. Requested billing records from CMS, reviewed them, and flagged transactions that were incurred as a consequence of Kachian's failure to respond to discovery and failure to meet and confer. I added up costs incurred by SAAG, SLA, and myself and entered into spreadsheet and updated declaration and motion.	2.00	\$440.00
		11/10/21	Gen-07	Pleading Preparation	Sent final request to CMS for the purpose of documenting costs related to motion to compel and failure of Defendant to meet and confer. Completed final review and sent documents on to SAAG before providing to client and to secretary for filing.	1.50	\$330.00
Ethan A. Turner - Total							
SA2020800072 - Total							

DECLARATION OF SERVICE BY CERTIFIED MAIL & FIRST CLASS MAIL/EMAIL
(Separate Mailings)

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
Case No.: **20CHCV00560**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On November 15, 2021, I served the attached **DECLARATION OF ETHAN TURNER IN SUPPORT OF MOTION TO COMPEL RESPONSES AND REQUEST FOR SANCTIONS** by transmitting a true copy via electronic mail & by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **DECLARATION OF ETHAN TURNER IN SUPPORT OF MOTION TO COMPEL RESPONSES AND REQUEST FOR SANCTIONS** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Margarita Salazar
Law Offices of Margarita Salazar, APLC,
470 Third Avenue, Ste. 9
Chula Vista, CA 91910-4663
Via F.C. Certified & E-Mail
Margarita@msalazarlaw.com

Ivy A. Wang
David J. Carroll
Browne, George, Ross, O'Brien, Annaguey,
and Ellis LLP
Via E-Mail
iwang@bgrfirm.com
dcarrroll@bgrfirm.com

Certified Article Number

9414 7266 9904 2176 9694 45

SENDER'S RECORD

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 15, 2021, at Sacramento, California.

Bryn Barton
Declarant


Signature