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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11 **NORTH VALLEY DISTRICT-CHATSWORTH COURTHOUSE**

12
13 **DEPARTMENT OF CANNABIS**
14 **CONTROL,**

15 Plaintiff,

16 v.

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

22 Defendants.

Case No. 20CHCV00560

**NOTICE OF MOTION AND MOTION
FOR SANCTIONS AGAINST
DEFENDANT RUBEN KACHIAN a.k.a.
RUBEN CROSS AND HIS ATTORNEY
OF RECORD MARGARITA SALAZAR
FOR VIOLATING COURT'S
DISCOVERY ORDER; MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT THEREOF**

Date: May 3, 2022
Time: 08:30 A.M.
Dept: F49
Judge: The Honorable Stephen P.
Pfahler

Trial Date: January 30, 2023
Action Filed: September 23, 2020

RESERVATION NO. 386860799955

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NOTICE OF MOTION

**TO DEFENDANT RUBEN KACHIAN, a.k.a. RUBEN CROSS, AND HIS
ATTORNEY OF RECORD, MARGARITA SALAZAR:**

PLEASE TAKE NOTICE that on May 3, 2022 at 8:30 a.m., or as soon thereafter as the matter may be heard, in Department F49 of the Los Angeles Superior Court at the Chatsworth Courthouse, 9425 Penfield Ave., Chatsworth, CA 91311, Plaintiff Department of Cannabis Control (“Plaintiff”) will move the Court to impose a monetary sanction, an issue sanction, and a contempt sanction against Defendant Ruben Kachian, a.k.a. Ruben Cross (“Defendant”), and his attorney of record, Margarita Salazar for violating the Court’s discovery order, dated January 10, 2022, which imposed January 20, 2022 as the deadline to produce responses to Plaintiff.

This motion is made pursuant to Code of Civil Procedure section 2023.010, subsection (g), and section 2023.030, subsections (a), (b), and (e). This motion is based upon this Notice and Motion, the Memorandum of Points and Authorities, the Declaration of Deputy Attorney General Michael Yun, the records and files in this action, and upon such further evidence and argument as may be presented prior to or at the time of hearing on the motion.

Dated: April 7, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
Harinder Kapur
Senior Assistant Attorney General
Joshua B. Eisenberg
Supervising Deputy Attorney General



MICHAEL J. YUN
ETHAN A. TURNER
Deputy Attorneys General
*Attorneys for Plaintiff
Department of Cannabis Control*

1 **MOTION**

2 The Department of Cannabis Control (hereinafter, "Plaintiff"), moves the Court to impose
3 (1) a monetary sanction, (2) an issue sanction, and (3) a contempt sanction against Defendant
4 Ruben Kachian, a.k.a. Ruben Cross (hereinafter, "Defendant"), and his attorney of record,
5 Margarita Salazar (hereinafter, "Salazar") for violating the Court's discovery order, dated January
6 10, 2022, which imposed January 20, 2022 as the deadline to produce responses to Plaintiff, in
7 accordance with Code of Civ. Proc., §§ 2023.010, subsection (g), and 2023.030, subsections (a),
8 (b), and (e). Plaintiff moves the Court to impose a total monetary sanction in the amount of
9 \$9,185.00 to compensate Plaintiff for its legal fees and costs as a result of Defendant's repeated
10 failure to respond to requests for discovery and his willful disobedience of this Court's Order.

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **INTRODUCTION**

13 When a party receives an order from the Superior Court of California, there are two
14 options: (1) comply with the order by the deadline set by the Court; or (2) before the deadline,
15 seek and obtain permission from the Court for more time to comply with the order. Here,
16 Defendant did neither and, instead, elected to willfully disobey this Court's discovery order, dated
17 January 10, 2022, in which this Court ordered Defendant "to serve verified responses to form
18 interrogatories without objections within ten days," imposed monetary "[s]anctions in the amount
19 of \$250 joint[ly] and severally imposed against both counsel and defendant Ruben Kachian aka
20 Ruben Cross," and ordered further that the monetary sanction be paid within 30 days of this
21 order." (Declaration of Deputy Attorney General Michael Yun (hereinafter, "Yun Dec."), Exhibit
22 1: "Notice of Court's Order" at p. 4.) To date, Defendant has not served Plaintiff with any
23 responses to form interrogatories, which are a routine method for a party to obtain information in
24 discovery, and has not paid the monetary sanction imposed on him and Salazar. (Yun Dec., ¶¶
25 11 & 12.) This willful disobedience is grounds for monetary, issue, and contempt sanctions.

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STATEMENT OF FACTS

On June 14, 2021, Plaintiff served Defendant with Form Interrogatories, Set One. (Yun Dec, Exhibit 1: “Notice of Court’s Order” at p. 4.) On November 15, 2021, following Defense-requested extensions over five months in total and Defendant’s failure to provide responses to Form Interrogatories, Set One, and Requests for Admissions, Set One, Plaintiff served Salazar via certified and electronic mail with copies of Plaintiff’s Notice of Motion, Motion, and Memorandum of Points and Authorities in Support of Motion to Compel Responses to Interrogatories, Set One, and Requests for Admissions, Set One (Motion to Compel). (Motion to Compel, p. 8; Declaration of Ethan Turner in Support of Motion to Compel (hereinafter, “Turner Dec”), ¶¶ 2-12.)

On January 10, 2022, the Motion to Compel was called for hearing in this Court. (Yun Dec, Exhibit 1: “Notice of Court’s Order” at p. 4.) Plaintiff’s motion was unopposed as no opposition papers were filed by Defendant and neither did Defendant or Salazar appear for the noticed hearing. (*Ibid.*) The Court adopted its tentative ruling and issued a minute order, dated January 10, 2022. (*Ibid.*) The Court’s Order reads as follows:

“Plaintiff [...] moves to compel responses to Form Interrogatories (set one) from Defendant Ruben Kachian aka Ruben Cross. Plaintiff served Defendant on June 14, 2021. [...] Plaintiff also served Request for Admissions served on June 14, 2021. [...] The subject items remain outstanding as of the date of the filing motion, even after an extension. The unopposed motions are granted. Defendant is ordered to serve verified responses to form interrogatories without objections within ten days. (Code Civ. Proc., § 2033.280, subd. (a-b).) The request for admissions is deemed admitted. (Code Civ. Proc., § 2033.280, subd. (a-b).) Sanctions in the amount of \$250 joint and severally imposed against both counsel and defendant Ruben Kachian aka Ruben Cross, and payable within 30 days of this order. (Code Civ. Proc., § 2030.290(c) and 2033.280, subd. (c).)”

(*Ibid.*)

Service of the Notice of Court’s Order on Defendant was made on the same day as the Court’s ruling. (Yun Dec, ¶ 6; *Id.* at Exhibit 1: “Notice of Court’s Order”.) On January 12, 2022, and January 19, 2022, counsel for Plaintiff emailed Salazar to remind her that the Court ordered Defendant to serve his responses to Plaintiff by January 20, 2022. (Yun Dec., ¶ 7; *Id.* at Exhibits 2 and 3.) On January 20, 2022, Salazar acknowledged the email, dated January 19, 2022,

1 requested a two-day extension, and promised “[she] will get the discovery out by tomorrow[,]
2 [January 21, 2022]. (Yun Dec., ¶ 8; *Id.* at Exhibit 4.) On January 20, 2022, counsel for Plaintiff
3 emailed Salazar to remind her that counsel for Plaintiff remain willing to accept service
4 electronically. (Yun Dec., ¶ 9; *Id.* at Exhibit 5.) On January 25, 2022, counsel for Plaintiff
5 emailed Salazar requesting that she provide an update regarding her efforts to comply with the
6 Court’s order. (Yun Dec., ¶ 10; Exhibit 6.) On January 26, 2022, counsel for Plaintiff emailed
7 Salazar to inform her, again, that no discovery responses had been received from her or
8 Defendant despite the Court’s Order. (Yun Dec., ¶ 10; Exhibit 7.)

9 Despite this, Defendant has failed to provide the ordered verified responses and has not
10 paid the monetary sanction. (Yun Dec., ¶¶ 11 & 12.) Neither have Defendant and Salazar
11 provided any justification for the failure to provide responses or for the violation of the Court’s
12 discovery order. (Yun Dec., ¶ 13.) Importantly, in willfully failing to provide the verified
13 responses to form interrogatories, Defendant also failed to “identify each denial of a material
14 allegation and each special or affirmative defenses” and failed to “identify all DOCUMENTS and
15 other tangible things that support your denial or special or affirmative defense, and state the
16 name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT.”
17 (Judicial Council of California’s Form Interrogatories—General, Rev. January 1, 2008, p. 6, No.
18 15.0: “Denials and Special or Affirmative Defenses.”) Nearly ten months following the initial
19 discovery request and more than 85 days after the Court’s discovery order, Defendant and
20 Salazar, still have not provided responses to the form interrogatories. (Yun Dec., ¶ 11; *Id.* at
21 Exhibit 1: “Notice of Court’s Order” at p. 4.)

22 ARGUMENT

23 I. THIS COURT SHOULD IMPOSE A MONETARY SANCTION AGAINST DEFENDANT AND 24 SALAZAR

25 Defendant and Salazar have willfully disobeyed this Court’s Order. For Defendant and
26 Salazar’s continuing willful disobedience of this Court’s discovery order, this Court should
27 impose a monetary sanction against them and allow Plaintiff to recover its legal fees, incurred as
28 a result of their conduct. “The court may impose a monetary sanction ordering that one engaging

1 in the misuse of the discovery process, or any attorney advising that conduct, or both pay the
2 reasonable expenses, including attorney's fees, incurred by anyone as a result of that conduct."
3 (Code of Civ. Proc., § 2023.030, subd. (a).) Misuses of the discovery process include disobeying
4 a court order to provide discovery. (Code of Civ. Proc., § 2023.010, subd. (g).)

5 Here, Defendant willfully disobeyed a court order to provide discovery and thereby
6 misused the discovery process. (*Ibid.*; Yun Dec., ¶¶ 6-13; see Notice of Court's Order at p. 4.).
7 Despite the notice of motion, Defendant and Salazar did not appear at the scheduled hearing.
8 (Yun Dec, Exhibit 2: "Declaration of Service for Motion to Compel"; *Id.* at Exhibit 1: "Notice of
9 Court's Order" at p. 4.) Pursuant to the Court's instruction, Plaintiff's counsel served Salazar
10 with a Notice of Court's Order, which included an attached copy of the Court's minute order.
11 (*Ibid.*) However, they have ignored the Court's order compelling discovery responses within ten
12 days and have continued their delinquency for more than 75 days. (Yun Dec., ¶ 11.) Plaintiff
13 and this Court have not been provided with any justification for their willful disobedience of this
14 Court's order. (Yun Dec., ¶ 13.) In addition, Defendant and Salazar, have failed to pay the Court
15 imposed "[s]anctions in the amount of \$250 joint[ly] and severally imposed against both counsel
16 and defendant Ruben Kachian aka Ruben Cross" which were ordered "to be paid within 30 days
17 of this order." (Yun Dec, Exhibit 1: "Notice of Court's Order" at p. 4.) Therefore, the Court
18 should impose a total monetary sanction in the amount of \$9,185.00 on Defendant and Salazar,
19 jointly and severally, to reimburse Plaintiff for its legal fees and costs, incurred as a result of
20 Defendant's willful disobedience of this Court's Order.

21 **II. THIS COURT SHOULD IMPOSE AN ISSUE SANCTION AGAINST DEFENDANT**

22 "The court may also impose an issue sanction by an order prohibiting any party engaging in
23 the misuse of the discovery process from supporting or opposing designated claims or defenses."
24 (Code of Civ. Proc., § 2023.030, subsection (b).) Misuses of the discovery process include
25 disobeying a court order to provide discovery. (Code of Civ. Proc., § 2023.010, subsection (g).)
26 Defendant has willfully disobeyed a court order to provide discovery, and has thereby misused
27 the discovery process. (*Ibid.*; Yun Dec., ¶¶ 6-13; see Notice of Court's Order at p. 4.) For his
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1 willful disobedience of this Court’s discovery order, this Court should impose an issue sanction
2 against Defendant by (1) finding Defendant has waived each and all of his special and affirmative
3 defenses and by (2) prohibiting Defendant from supporting or opposing designated claims or
4 defenses with documents and any other evidence including testimonies of witnesses that have so
5 far been unidentified and not produced to Plaintiff for over ten months since the initial discovery
6 request and more than 85 days after this Court’s Order.

7 Moreover, in his willful failure to provide verified responses to form interrogatories,
8 Defendant also failed to “identify each denial of a material allegation and each special or
9 affirmative defenses” and failed to “identify all DOCUMENTS and other tangible things that
10 support your denial or special or affirmative defense, and state the name, ADDRESS, and
11 telephone number of the PERSON who has each DOCUMENT.” (Judicial Council of
12 California’s Form Interrogatories—General (hereinafter, “Judicial Council’s Form”), Rev.
13 January 1, 2008 at p. 6, No. 15.0: “Denials and Special or Affirmative Defenses”.) By repeatedly
14 failing to identify each denial of a material allegation and each special or affirmative defenses,
15 including by willfully disobeying this Court’s discovery order, Defendant has waived his special
16 and affirmative defenses.

17 Defendant’s willful defiance of this Court’s discovery order is a proper basis to prohibit
18 him from offering the same documents and witnesses that support any denial or special or
19 affirmative defenses at trial. (See *Thoren v. Johnson & Washer* (1972) 29 Cal.App.3d 270, 274
20 [trial court properly excluded plaintiff’s witnesses’ proposed testimony on ground that plaintiff
21 had willfully omitted witnesses’ names in answers to interrogatories]; *Biles v. Exxon Mobil Corp.*
22 (2004) 124 Cal.App.4th 1315, 1324-1325; *Dwyer v. Crocker Nat. Bank* (1987) 194 Cal.App.3d
23 1418, 1431 [order limiting plaintiff’s testimony at trial following invocation of his privilege
24 against self-incrimination at his deposition and his failure to produce documents was not abuse of
25 discretion]; *Young v. Rosenthal* (1989) 212 Cal.App.3d 96, 119 [precluding party from using the
26 relevant documents was proper for willful failure to answer interrogatories and refusing to
27 properly identify and produce documents for inspection; prohibiting party from testifying was
28 proper sanction for willful, repeated refusal to allow his deposition to go forward]; *Vallbona v.*

1 *Springer* (1996) 43 Cal.App.4th 1525, 1545 [evidence sanction was proper where defendants
2 initially failed to respond to request for documents pertaining to whether they had sought
3 independent review board approval for their laser procedure, then claimed documents were
4 stolen, and then brought some of them to trial]; *Juarez v. Boy Scouts of America* (2000) 81
5 Cal.App.4th 377, 390 [in action against national youth organization and church by former
6 member who was allegedly molested by organization group leader, trial judge properly imposed
7 evidence sanction, where plaintiff's responses to defendants' repeated requests to identify
8 information he had concerning defendants' knowledge about leader's propensities and
9 background were evasive and uncooperative].)

10 Here, Defendant has failed to "identify each denial of a material allegation and each special
11 or affirmative defenses." (Judicial Council's Form, p. 6, No. 15.0.) Accordingly, as an issue
12 sanction, each, any, and all of Defendant's special and affirmative defenses should now be
13 deemed waived and Defendant should be prohibited from later raising them at trial in light of his
14 willful, repeated failures to raise them, including by outright disobeying this Court's Order.
15 Additionally, Defendant has failed to "identify all DOCUMENTS and other tangible things that
16 support [his] denial or special or affirmative defense, and state the name, ADDRESS, and
17 telephone number of the PERSON who has each DOCUMENT." (*Ibid.*) For this reason,
18 Defendant should also be prohibited from offering any documents or witnesses at trial "that
19 support [his] denial or special or affirmative defense" because he has willfully and repeatedly
20 failed to provide them to Plaintiff for more than ten months, which includes more than 85 days
21 after this Court ordered Defendant to turn them over in responses. (*Ibid.*) To permit Defendant's
22 continued disregard of this Court's discovery order without consequence would violate the
23 maxim of jurisprudence that no one can take advantage of his/her own wrong. (Civ. Code, §
24 3517.)

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1 **III. THIS COURT SHOULD IMPOSE A CONTEMPT SANCTION AGAINST DEFENDANT AND**
2 **SALAZAR**

3 “The court may impose a contempt sanction by an order treating the misuse of the
4 discovery process as a contempt of court.” (Code of Civ. Proc., § 2023.030, subd. (e).) Misuses
5 of the discovery process include disobeying a court order to provide discovery. (Code of Civ.
6 Proc., § 2023.010, subd. (g).) For their willful disobedience of this Court’s discovery order issued
7 on January 10, 2022, without any justifications, this Court should impose a contempt sanction
8 against Defendant and Salazar.

9 Defendant misused the discovery process when he failed to produce any discovery despite
10 receiving extensions over a five-month period from Plaintiff. Defendant acknowledged his
11 misuse of the discovery process when he failed to file any opposition to Plaintiff’s Motion to
12 Compel Discovery. Defendant further acknowledged his misuse of the discovery process when
13 he and Salazar failed to appear in court for the Motion to Compel hearing. Defendant further
14 misused the discovery process when he and Salazar willfully disobeyed this Court’s discovery
15 order, issued on January 10, 2022, which imposed a January 20, 2022 production deadline.
16 Defendant and Salazar should not be permitted to engage in their persistent and disobedient
17 strategy without appropriate redress from this Court.

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1 **CONCLUSION**

2 For the foregoing reasons, Plaintiff requests that this motion for sanctions against
3 Defendant Ruben Kachian and his attorney of record, Margarita Salazar, be granted in all
4 respects.

5 Dated: April 7, 2022

Respectfully submitted,

6 ROB BONTA
7 Attorney General of California
8 HARINDER KAPUR
9 Senior Assistant Attorney General
10 JOSHUA B. EISENBERG
11 Supervising Deputy Attorney General

12 

13 MICHAEL J. YUN
14 ETHAN A. TURNER
15 Deputy Attorneys General
16 *Attorneys for Plaintiff and Petitioner*
17 *Department of Cannabis Control*

18 SA2020800072
19 VB-Motion for Sanctions (Final).docx
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Make a Reservation

Success! Your Reservation Number is **386860799955**.

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al. vs VERTICAL BLISS, INC., et al.

Case Number: 20CHCV00560 Case Type: Civil Unlimited Category: Other Commercial Complaint (non-tort/non-complex)
Date Filed: 2020-09-23 Location: Chatsworth Courthouse - Department F49

Reservation	
Case Name:	CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al. vs VERTICAL BLISS, INC., et al.
Case Number:	20CHCV00560
Type:	Motion for Sanctions
Status:	RESERVED
Filing Party:	California Department of Cannabis Control (Plaintiff - Substituted/Consolidated) (Party Role to be determined)
Location:	Chatsworth Courthouse - Department F49
Date/Time:	05/03/2022 8:30 AM
Number of Motions:	1
Reservation ID:	386860799955
Confirmation Code:	CR-VQZVTEFHKCV69EQM5

Fees			
Description	Fee	Qty	Amount
Motion for Sanctions *** Fees Exempted by Gov Code 6103.1 ***	60.00	1	0.00
TOTAL			\$0.00

Contact Information

Fields marked with an (*) are required

First Name *

Michael

Last Name *

Yun

Telephone Number *

619

4051774

Extension

Primary Email *

michael.yun@doj.ca.gov

Enter Email Again *

michael.yun@doj.ca.gov

Secondary Email

Enter Email Again

If the requestor wishes to receive notifications via text message, enter the mobile phone number.

Notification Number

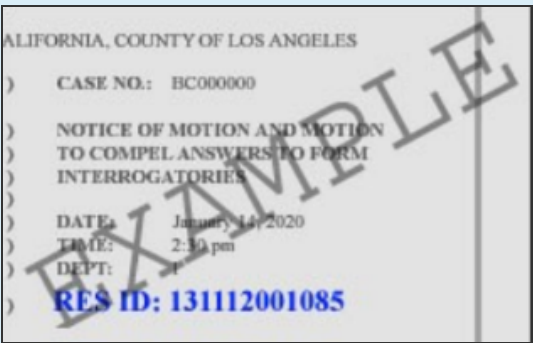
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4051774

Payment	
Amount:	\$0.00
Type:	GOVT_EXEMPT
Account Number:	n/a
Authorization:	n/a

Instructions

Please print this receipt and attach it to the corresponding motion/document as the last page. Indicate the Reservation ID on the motion/document face page (see example). The document will not be accepted without this receipt page and the Reservation ID.



A COPY OF THIS RECEIPT MUST BE ATTACHED TO THE CORRESPONDING MOTION/DOCUMENT AS THE LAST PAGE AND THE RESERVATION ID INDICATED ON THE MOTION/DOCUMENT FACE PAGE.

Print Receipt

Reserve Another Hearing

View My Reservations

DECLARATION OF SERVICE BY E-MAIL and U.S. Mail

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
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 April 8, 2022, I served the attached **NOTICE OF MOTION AND MOTION FOR SANCTIONS AGAINST DEFENDANT RUBEN KACHIAN A.K.A. RUBEN CROSS AND HIS ATTORNEY OF RECORD MARGARITA SALAZAR FOR VIOLATING COURT'S DISCOVERY ORDER; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF; AND DECLARATION OF MICHAEL YUN IN SUPPORT OF MOTION FOR SANCTIONS** by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

Party	Address
Margarita Salazar, Esq. <i>Attorney for Defendants Ruben Kachian, Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC., More Agency, Inc., Arutyun Barsamyan, and Mike A. Toroyan</i>	Margarita Salazar, Esq. Law Offices of Margarita Salazar 470 Third Avenue, Ste. 9 Chula Vista, CA 91910-4663 E-mail Address: margarita@msalazarlaw.com
Ian Stewart Wilson Elser Moskowitz Edelman & Dicker LLP <i>Attorney for Defendant Kevin Halloran</i>	E-mail Address: ian.stewart@wilsonelser.com

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 April 8, 2022, at San Diego, California.

A. Flores

Declarant



Signature