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9	Department of Cannabis Control		NAT TEODNIA
10	SUPERIOR COUNTY OF I		
11	COUNTY OF L NORTH VALLEY DISTRICT-CI		
12	NORTH VALLEY DISTRICT-CI	HAISWUKIE	COURTHOUSE
13		Case No. 20C	HCV00560
14	DEPARTMENT OF CANNABIS CONTROL,		
15	Plaintiff,	UNDISPUTE SUPPORT O	STATEMENT OF D MATERIAL FACTS IN F DEPARTMENT OF
16	V.	SUMMARY.	CONTROL'S MOTION FOR JUDGMENT
17	VERTICAL BLISS, INC., KUSHY PUNCH,	Date:	December 5, 2022
18	INC., CONGLOMERATE MARKETING, LLC, MORE AGENCY, INC., RUBEN	Time: Dept:	08:30 A.M. F49
19	KACHIAN a.k.a. RUBEN CROSS, ARUTYUN BARSAMYAN, KEVIN	Judge:	The Honorable Stephen P. Pfahler
20	HALLORAN, MIKE A. TOROYAN and DOES 1 through 30, inclusive,	Trial Date:	January 30, 2023
21		Action Filed:	September 23, 2020
22	Defendants.	RESERVATI 	ON NO. 590950777530
23			: .:
24	Plaintiff Department of Cannabis Control (h		
25	following undisputed material facts in support of		,
26	pursuant to Code of Civil Procedure section 437c,	subdivision (b)	0(1):
27	///		
28	1		

1	Moving Party's Undisputed Material Facts and Supporting Evidence:	Opposing Party's Response and Supporting Evidence:
2	No. 1 through 7 pertain to Defendant Ruben	
3	Kachian, a.k.a. "Ruben Cross"	
5	1. Defendant Ruben Kachian, a.k.a. "Ruben Cross" ("Defendant Kachian") was the Chief Executive Officer ("CEO") of	1.
6	Defendant Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.	
7		
8	(Declaration of DAG Michael Yun in Support of Plaintiff's MSJ ("Yun Dec."), Exh. 1: Plaintiff's Request for Admission ("RFA") to	
9	Defendant Kachian, No. 1, served on June 14, 2021; Request for Judicial Notice in Support of	
10 11	DCC's MSJ ("RJN"), Exh. A: Order Deeming Plaintiff's RFA to Defendant Kachian, Admitted, dated January 10, 2022.)	
12	2. Defendant Kachian was the CEO of Defendant More Agency, Inc. in the	2.
13	period from April 23, 2018 to October 2, 2019.	
14	(Yun Dec., Exh. 1: Plaintiff's RFA to	
15	Defendant Kachian, No. 3, served on June 14, 2021; RJN, Exh. A: Order Deeming Plaintiff's	
1617	RFA to Defendant Kachian, Admitted, dated January 10, 2022.)	
18	3. Defendant Kachian was the CEO of Defendant Kushy Punch, Inc. in the	3.
19	period from April 23, 2018 to October 2, 2019.	
20	(Yun Dec., Exh. 1: Plaintiff's RFA to	
21	Defendant Kachian, No. 7, served on June 14, 2021; RJN, Exh. A: Order Deeming Plaintiff's	
22	RFA to Defendant Kachian, Admitted, dated January 10, 2022.)	
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1 2	4. Defendant Kachian was an OWNER of Defendant Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.	4.
3 4	(Yun Dec., Exh. 1: Plaintiff's RFA to Defendant Kachian, No. 8, served on June 14,	
5	2021; RJN, Exh. A: Order Deeming Plaintiff's RFA to Defendant Kachian, Admitted, dated	
6	January 10, 2022.)	
7	5. Defendant Kachian was an OWNER of	5.
8	Defendant Kushy Punch, Inc. in the period from April 23, 2018 to October 2,	
9	2019.	
10	(Yun Dec., Exh. 1: Plaintiff's RFA to Defendant Kachian, No. 11, served on June 14, 2021; RJN, Exh. A: Order Deeming Plaintiff's	
11	RFA to Defendant Kachian, Admitted, dated January 10, 2022.)	
12	, ,	
13	6. Defendant Kachian was an OWNER of Defendant More Agency, Inc. in the period from April 23, 2018 to October 2,	6.
14	2019.	
15	(Yun Dec., Exh. 1: Plaintiff's RFA to Defendant Kachian, No. 14, served on June 14,	
16 17	2021; RJN, Exh. A: Order Deeming Plaintiff's RFA to Defendant Kachian, Admitted, dated	
	January 10, 2022.)	
18 19	7. Defendant Kachian was an OWNER of Defendant Conglomerate Marketing, LLC in the period from April 23, 2018 to	7.
20	October 2, 2019.	
21	(Yun Dec., Exh. 1: Plaintiff's RFA to Defendant Kachian, No. 17, served on June 14,	
22	2021; RJN, Exh. A: Order Deeming Plaintiff's RFA to Defendant Kachian, Admitted, dated	
23	January 10, 2022.)	
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1	No. 8 through 15 pertain to Defendant Vertical Bliss, Inc.	
2	,	
3	8. Defendant Vertical Bliss leased the PREMISES in the period from April 23, 2018 to October 2, 2019.	8.
4	, in the second of the second	
5	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 2, served on	
6	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss, Admitted, dated July 18, 2022.)	
7	• • • • • • • • • • • • • • • • • • • •	
8	9. Defendant Vertical Bliss operated a business at the PREMISES in the period	9.
9	from April 23, 2018 to October 2, 2019.	
10	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 3, served on	
11	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss,	
12	Admitted, dated July 18, 2022.)	
13	10. Defendant Vertical Bliss did NOT have a COMMERCIAL CANNABIS LICENSE	10.
14	to engage in COMMERCIAL MANUFACTURING CANNABIS	
15	ACTIVITY at the PREMISES in the period from April 23, 2018 to October 2, 2019.	
16	2019.	
17	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 4, served on	
18	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss,	
19	Admitted, dated July 18, 2022; Declaration of Laura Meeks (Meeks Dec.), ¶ 9.a.; Declaration	
20	of Eileen Del Rosario (Del Rosario Dec.), ¶¶ 36, 39, and 51.)	
21	11. Defendant Vertical Bliss engaged in	11.
22	COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the	
23	PREMISES on 527 separate days, in the period from April 23, 2018 to October 2, 2019.	
24		
25	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 12, served on	
26	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss,	
27	Admitted, dated July 18, 2022; Del Rosario Dec., ¶ 51.)	
28		

1 2 3	12. The GROSS REVENUE Defendant Vertical Bliss received from COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,	12.
4	2018 to April 22, 2019 exceeded \$10,000,000.	
5	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 18, served on	
6 7	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss, Admitted, dated July 18, 2022.)	
8		
9	13. Defendant Vertical Bliss did NOT have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL	13.
10	DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the	
11 12	period from April 23, 2018 to October 2, 2019.	
13	(Yun Dec., Exh. 2: Plaintiff's RFA to Defendant Vertical Bliss, No. 19, served on	
14	June 14, 2021; RJN, Exh. D: Order Deeming Plaintiff's RFA to Defendant Vertical Bliss, Admitted, dated July 18, 2022; Meeks Dec., ¶	
15	9.a.; Del Rosario Dec., ¶¶ 36, 39, and 51.)	
16	14 Defendant Vertical Plies angued in	14.
17	14. Defendant Vertical Bliss engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from	14.
18 19	the PREMISES, on 527 separate days, in the period from April 23, 2018 to October 2, 2019.	
20	(Yun Dec., Exh. 2: Plaintiff's RFA to	
21	Defendant Vertical Bliss, No. 27, served on June 14, 2021; RJN, Exh. D: Order Deeming	
22	Plaintiff's RFA to Defendant Vertical Bliss, Admitted, dated July 18, 2022; Del Rosario	
23	Dec., ¶ 51.)	
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1	15. The GROSS REVENUE Defendant Vertical Bliss received from	15.
2	COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from	
3	the PREMISES in the period from April	
4	23, 2018 to April 22, 2019 was more than \$1,000,000.	
5	(Yun Dec., Exh. 2: Plaintiff's RFA to	
6	Defendant Vertical Bliss, No. 28, served on June 14, 2021; RJN, Exh. D: Order Deeming	
7	Plaintiff's RFA to Defendant Vertical Bliss, Admitted, dated July 18, 2022.)	
8	N. 164 D. C. L. C. D. C. D. C. L. C. D. C.	
9	No. 16 through 23 pertain to Defendant Kushy Punch, Inc.	
10	16. Defendant Kushy Punch leased the	16.
11	PREMISES in the period from April 23, 2018 to October 2, 2019.	
12	(Yun Dec., Exh. 4: Plaintiff's RFA to	
13	Defendant Kushy Punch, No. 2, served on June 14, 2021; RJN, Exh. E: Order Deeming	
14	Plaintiff's RFA to Defendant Kushy Punch, Admitted, dated July 29, 2022.)	
15	17 Defendent Verder Drugels an auste de	17
16	17. Defendant Kushy Punch operated a business at the PREMISES in the period	17.
17	from April 23, 2018 to October 2, 2019.	
18	(Yun Dec., Exh. 4: Plaintiff's RFA to Defendant Kushy Punch, No. 3, served on June	
19	14, 2021; RJN, Exh. E: Order Deeming Plaintiff's RFA to Defendant Kushy Punch,	
20	Admitted, dated July 29, 2022.)	
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1	18. Defendant Kushy Punch did NOT have a COMMERCIAL CANNABIS LICENSE	18.
2	to engage in COMMERCIAL MANUFACTURING CANNABIS	
3	ACTIVITY at the PREMISES in the period from April 23, 2018 to October 2,	
4	2019.	
5	(Yun Dec., Exh. 4: Plaintiff's RFA to Defendant Kushy Punch, No. 4, served on June	
6	14, 2021; RJN, Exh. E: Order Deeming Plaintiff's RFA to Defendant Kushy Punch,	
7	Admitted, dated July 29, 2022; Meeks Dec., ¶ 9.b.; Del Rosario Dec., ¶¶ 36, 39, and 51.)	
8		
9	19. Defendant Kushy Punch engaged in COMMERCIAL MANUFACTURING	19.
10	CANNABIS ACTIVITY at the PREMISES on 527 separate days, in the	
11	period from April 23, 2018 to October 2, 2019.	
12	(Yun Dec., Exh. 4: Plaintiff's RFA to	
13	Defendant Kushy Punch, No. 12, served on June 14, 2021; RJN, Exh. E: Order Deeming	
14	Plaintiff's RFA to Defendant Kushy Punch, Admitted, dated July 29, 2022; Del Rosario	
15	Dec., ¶ 51.)	
16	20. The GROSS REVENUE Defendant	20.
17 18	Kushy Punch received from COMMERCIAL MANUFACTURING	
19	CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019 exceeded	
20	\$10,000,000.	
21	(Yun Dec., Exh. 4: Plaintiff's RFA to Defendant Kushy Punch, No. 18, served on	
22	June 14, 2021; RJN, Exh. E: Order Deeming Plaintiff's RFA to Defendant Kushy Punch,	
23	Admitted, dated July 29, 2022.)	
24		
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1 2 3	21. Defendant Kushy Punch did NOT have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the	21.
4	period from April 23, 2018 to October 2, 2019.	
5	(Yun Dec., Exh. 4: Plaintiff's RFA to	
6	Defendant Kushy Punch, No. 19, served on June 14, 2021; RJN, Exh. E: Order Deeming	
7	Plaintiff's RFA to Defendant Kushy Punch, Admitted, dated July 29, 2022; Meeks Dec., ¶	
8	9.b.; Del Rosario Dec., ¶¶ 36, 39, and 51.)	
9	22. Defendant Kushy Punch engaged in	22.
10	COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from	
11	the PREMISES, on 527 separate days, in the period from April 23, 2018 to October	
12	2, 2019.	
13	(Yun Dec., Exh. 4: Plaintiff's RFA to Defendant Kushy Punch, No. 27, served on	
14	June 14, 2021; RJN, Exh. E: Order Deeming Plaintiff's RFA to Defendant Kushy Punch,	
15	Admitted, dated July 29, 2022; Del Rosario Dec., ¶ 51.)	
16	22 TI CDOGG BEVENIUE D. C. 1	
17	23. The GROSS REVENUE Defendant Kushy Punch received from COMMERCIAL DISTRIBUTOR	23.
18	CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April	
19	23, 2018 to April 22, 2019 was more than \$1,000,000.	
20	(Yun Dec., Exh. 4: Plaintiff's RFA to	
21	Defendant Kushy Punch, No. 28, served on June 14, 2021; RJN, Exh. E: Order Deeming	
22	Plaintiff's RFA to Defendant Kushy Punch, Admitted, dated July 29, 2022.)	
23	11 minimou, datou sury 27, 2022.)	
24	No. 24 through 31 pertain to Defendant Conglomerate Marketing, LLC	
25	Congression Marine Marine, Elec-	
26		
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28	Q	

1 2	24. Defendant Conglomerate Marketing leased the PREMISES in the period from April 23, 2018 to October 2, 2019.	24.
3	(Yun Dec., Exh. 6: Plaintiff's RFA to	
4	Defendant Conglomerate Marketing, No. 2, served on June 14, 2021; RJN, Exh. F: Order	
5	Deeming Plaintiff's RFA to Defendant Conglomerate Marketing, Admitted, dated	
6	August 1, 2022.)	
7	25. Defendant Conglomerate Marketing operated a business at the PREMISES in	25.
8	the period from April 23, 2018 to October 2, 2019.	
9	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 3,	
10	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant	
11	Conglomerate Marketing, Admitted, dated August 1, 2022.)	
12	August 1, 2022.)	
13	26. Defendant Conglomerate Marketing did NOT have a commercial cannabis license	26.
14	to engage in COMMERCIAL MANUFACTURING CANNABIS	
15	ACTIVITY at the PREMISES in the	
16	period from April 23, 2018 to October 2, 2019.	
17	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 4,	
18	served on June 14, 2021; RJN, Exh. F: Order	
19	Deeming Plaintiff's RFA to Defendant Conglomerate Marketing, Admitted, dated August 1, 2022; Meeks Dec., ¶ 9.c.; Del	
20	Rosario Dec., ¶¶ 36, 39, and 51.)	
21		
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1 2	27. Defendant Conglomerate Marketing engaged in COMMERCIAL MANUFACTURING CANNABIS	27.
3	ACTIVITY at the PREMISES on 527 separate days, in the period from April 23, 2018 to October 2, 2019.	
4		
5	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 12,	
6	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant Conglomerate Marketing, Admitted, dated	
7	August 1, 2022; Del Rosario Dec., ¶ 51.)	
8	20 El CROCC DEVENHED C. 1	20
9	28. The GROSS REVENUE Defendant Conglomerate Marketing received from COMMERCIAL MANUFACTURING	28.
10	CANNABIS ACTIVITY at the PREMISES in the period from April 23,	
11	2018 to April 22, 2019 exceeded	
12	\$10,000,000.	
13	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 18,	
14	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant	
15	Conglomerate Marketing, Admitted, dated August 1, 2022.)	
16		
17	29. Defendant Conglomerate Marketing did NOT have a COMMERCIAL CANNABIS LICENSE to engage in	29.
18	COMMERCIAL DISTRIBUTOR	
19	CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April	
20	23, 2018 to October 2, 2019.	
21	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 19,	
22	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant	
23	Conglomerate Marketing, Admitted, dated August 1, 2022; Meeks Dec., ¶ 9.c.; Del	
24	Rosario Dec., ¶¶ 36, 39, and 51.)	
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26		
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1 2	30. Defendant Conglomerate Marketing engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on 527	30.
3	separate days, in the period from April 23, 2018 to October 2, 2019.	
5	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 27,	
6	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant	
7	Conglomerate Marketing, Admitted, dated August 1, 2022; Del Rosario Dec., ¶ 51.)	
8	31. The GROSS REVENUE Defendant Conglomerate Marketing received from	31.
9	COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from	
10	the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than	
11	\$1,000,000.	
12	(Yun Dec., Exh. 6: Plaintiff's RFA to Defendant Conglomerate Marketing, No. 28,	
14	served on June 14, 2021; RJN, Exh. F: Order Deeming Plaintiff's RFA to Defendant Conglomerate Marketing, Admitted, dated	
15	August 1, 2022.)	
16	No. 32 through 39 pertain to Defendant More Agency, Inc.	
17 18	32. Defendant More Agency leased the PREMISES in the period from April 23, 2018 to October 2, 2019.	32.
19	(Yun Dec., Exh. 8: Plaintiff's RFA to	
20	Defendant More Agency, No. 2, served on June 14, 2021; RJN, Exh. G: Order Deeming Plaintiff's RFA to Defendant More Agency,	
21	Admitted, dated August 2, 2022.)	
22	33. Defendant More Agency operated a business at the PREMISES in the period	33.
23	from April 23, 2018 to October 2, 2019.	
24	(Yun Dec., Exh. 8: Plaintiff's RFA to Defendant More Agency, No. 3, served on	
25	June 14, 2021; RJN, Exh. G: Order Deeming Plaintiff's RFA to Defendant More Agency,	
26	Admitted, dated August 2, 2022.)	
27		
28	11	

1	34. Defendant More Agency did NOT have a	34.
2	commercial cannabis license to engage in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the	
3	PREMISES in the period from April 23, 2018 to October 2, 2019.	
4	(Yun Dec., Exh. 8: Plaintiff's RFA to	
5	Defendant More Agency, No. 4, served on June 14, 2021; RJN, Exh. G: Order Deeming	
6	Plaintiff's RFA to Defendant More Agency, Admitted, dated August 2, 2022; Meeks Dec.,	
7	¶ 9.d.; Del Rosario Dec., ¶¶ 36, 39, and 51.)	
8	25 Defendant Mara Aganey angaged in	35.
9	35. Defendant More Agency engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the	33.
10	PREMISES on 527 separate days, in the period from April 23, 2018 to October 2,	
11	2019.	
12	(Yun Dec., Exh. 8: Plaintiff's RFA to	
13	Defendant More Agency, No. 12, served on June 14, 2021; RJN, Exh. G: Order Deeming	
14	Plaintiff's RFA to Defendant More Agency, Admitted, dated August 2, 2022; Del Rosario	
15	Dec., ¶ 51.)	
16	36. The GROSS REVENUE Defendant More Agency received from COMMERCIAL	36.
17	MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the	
18 19	period from April 23, 2018 to April 22, 2019 exceeded \$10,000,000.	
	(Yun Dec., Exh. 8: Plaintiff's RFA to	
20	Defendant More Agency, No. 18, served on June 14, 2021; RJN, Exh. G: Order Deeming	
21	Plaintiff's RFA to Defendant More Agency, Admitted, dated August 2, 2022.)	
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1 2 3 4	37. Defendant More Agency did NOT have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to October 2, 2019.	37.
5	(Yun Dec., Exh. 8: Plaintiff's RFA to	
6	Defendant More Agency, No. 19, served on June 14, 2021; RJN, Exh. G: Order Deeming	
7	Plaintiff's RFA to Defendant More Agency, Admitted, dated August 2, 2022; Meeks Dec.,	
8	¶ 9.d.; Del Rosario Dec., ¶¶ 36, 39, and 51.)	
9	38. Defendant More Agency engaged in COMMERCIAL DISTRIBUTOR	38.
10	CANNABIS ACTIVITY at, to, or from the PREMISES, on 527 separate days, in	
11	the period from April 23, 2018 to October 2, 2019.	
12	(Yun Dec., Exh. 8: Plaintiff's RFA to	
13	Defendant More Agency, No. 27, served on June 14, 2021; RJN, Exh. G: Order Deeming	
14	Plaintiff's RFA to Defendant More Agency, Admitted, dated August 2, 2022; Del Rosario	
15	Dec., ¶ 51.)	
16	39. The GROSS REVENUE Defendant More	39.
17	Agency received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY	
18	at, to, or from the PREMISES in the period from April 23, 2018 to April 22,	
19	2019 was more than \$1,000,000.	
20	(Yun Dec., Exh. 8: Plaintiff's RFA to Defendant More Agency, No. 28, served on	
21	June 14, 2021; RJN, Exh. G: Order Deeming Plaintiff's RFA to Defendant More Agency,	
22	Admitted, dated August 2, 2022.)	
23	No. 40 days and 44 marks in 45 Defendant	
24	No. 40 through 44 pertain to Defendant Arutyun Barsamyan	
25		
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28	13	

1 2	40. Defendant Arutyun Barsamyan ("Defendant Barsamyan") was the CEO of Defendant Kushy Punch, Inc. in the	40.
3	period from April 23, 2018 to October 2, 2019.	
4	(Yun Dec., Exh. 10: Plaintiff's RFA to Defendant Barsamyan, No. 1, served on June	
5	14, 2021; RJN, Exh. C: Order Deeming Plaintiff's RFA to Defendant Barsamyan,	
6	Admitted, dated July 15, 2022, p. 3, lns. 4-5.)	
7	41. Defendant Barsamyan was an OWNER of	41.
8 9	Defendant Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.	
10	(Yun Dec., Exh. 10: Plaintiff's RFA to	
11	Defendant Barsamyan, No. 5, served on June 14, 2021; RJN, Exh. C: Order Deeming	
12	Plaintiff's RFA to Defendant Barsamyan, Admitted, dated July 15, 2022, p. 3, lns. 4-5.)	
13		
14	42. Defendant Barsamyan was an OWNER of Defendant Kushy Punch, Inc. in the period from April 23, 2018 to October 2,	42.
15	2019.	
16	(Yun Dec., Exh. 10: Plaintiff's RFA to Defendant Barsamyan, No. 8, served on June	
17	14, 2021; RJN, Exh. C: Order Deeming Plaintiff's RFA to Defendant Barsamyan,	
18 19	Admitted, dated July 15, 2022, p. 3, lns. 4-5.)	
20	43. Defendant Barsamyan was an OWNER of Defendant More Agency, Inc. in the	43.
21	period from April 23, 2018 to October 2, 2019.	
22	(Yun Dec., Exh. 10: Plaintiff's RFA to	
23	Defendant Barsamyan, No. 11, served on June 14, 2021; RJN, Exh. C: Order Deeming	
24	Plaintiff's RFA to Defendant Barsamyan, Admitted, dated July 15, 2022, p. 3, lns. 4-5.)	
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1 2	44. Defendant Barsamyan was an OWNER of Defendant Conglomerate [Marketing] ¹ , LLC in the period from April 23, 2018 to	44.
3	October 2, 2019.	
4	(Yun Dec., Exh. 10: Plaintiff's RFA to Defendant Barsamyan, No. 14, served on June	
5	14, 2021; RJN, Exh. C: Order Deeming Plaintiff's RFA to Defendant Barsamyan,	
6	Admitted, dated July 15, 2022, p. 3, lns. 4-5.)	
7	No. 45 through 48 pertain to Defendant Mike A. Toroyan	
8	Wilke A. Toroyan	
9	45. Defendant Mike A. Toroyan ("Defendant Toroyan") was an OWNER of Defendant	45.
10	Vertical Bliss, Inc. in the period from April 23, 2018 to October 2, 2019.	
11	(Yun Dec., Exh. 12: Plaintiff's RFA to	
12	Defendant Toroyan, No. 2, served on June 14, 2021; RJN, Exh. H: Order Deeming Plaintiff's	
13	RFA to Defendant Toroyan, Admitted, dated August 10, 2022, pp. 2-3.)	
14	46. Defendant Toroyan was an OWNER of	46.
15	Defendant Kushy Punch, Inc. in the period from April 23, 2018 to October 2, 2019.	
16		
17	(Yun Dec., Exh. 12: Plaintiff's RFA to Defendant Toroyan, No. 5, served on June 14,	
18	2021; RJN, Exh. H: Order Deeming Plaintiff's RFA to Defendant Toroyan, Admitted, dated	
19	August 10, 2022, pp. 2-3.)	
20	47. Defendant Toroyan was an OWNER of Defendant More Agency, Inc. in the	47.
21	period from April 23, 2018 to October 2, 2019.	
22	(Yun Dec., Exh. 12: Plaintiff's RFA to	
23	Defendant Toroyan, No. 8, served on June 14, 2021; RJN, Exh. H: Order Deeming Plaintiff's	
24	RFA to Defendant Toroyan, Admitted, dated August 10, 2022, pp. 2-3.)	
25		
26	¹ Although RFA No. 14 in RFA to Defendant Barsamyan referred to Conglomerate	

¹ Although RFA No. 14 in RFA to Defendant Barsamyan referred to Conglomerate Marketing, LLC as "Conglomerate Management, LLC," it was correctly referred to as "Conglomerate Marketing, LLC" in RFA No. 16. There are no other Defendants or entities in this case with the word "Conglomerate" in its name, other than Conglomerate Marketing, LLC.

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1 2	48. Defendant Toroyan was an OWNER of Defendant Conglomerate [Marketing] ² , LLC in the period from April 23, 2018 to
3	October 2, 2019.
4	(Yun Dec., Exh. 12: Plaintiff's RFA to Defendant Toroyan, No. 11, served on June 14,
5	2021; RJN, Exh. H: Order Deeming Plaintiff's RFA to Defendant Toroyan, Admitted, dated
6	August 10, 2022, pp. 2-3.)
7	
8	Dated: September 21, 2022 Respectfully submitted,
9	ROB BONTA
10	Attorney General of California HARINDER KAPUR
11	Senior Assistant Attorney General JOSHUA B. EISENBERG
12	Supervising Deputy Attorney General
13	Michaelly_
14	
15	Michael J. Yun Ethan A. Turner
16	GREGORY M. CRIBBS Deputy Attorneys General
17	Attorneys for Plaintiff Department of Cannabis Control
18	
19	
20	
21	
22	
23	
24	
25	
26	² Although RFA No. 11 in RFA to Defendant Toroyan referred to Conglomerate
27	Marketing, LLC as "Conglomerate Management, LLC," it was correctly referred to as "Conglomerate Marketing, LLC" in RFA No. 13. There are no other Defendants or entities in
28	this case with the word "Conglomerate" in its name, other than Conglomerate Marketing, LLC.

DECLARATION OF SERVICE BY U.S. Mail and E-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 <u>September 21, 2022</u>, I served the attached <u>SEPARATE STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF DEPARTMENT OF CANNABIS CONTROL'S MOTION FOR SUMMARY JUDGMENT 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:</u>

Party	Address
Margarita Salazar, Esq.	Margarita Salazar, Esq.
Attorney for Defendants Vertical Bliss, Inc.,	Law Offices of Margarita Salazar
Kushy Punch, Inc., Conglomerate Marketing,	470 Third Avenue, Ste. 9
LLC., More Agency, Inc., Ruben Kachian,	Chula Vista, CA 91910-4663
Arutyun Barsamyan, and Mike A. Toroyan	E-mail Address:
	margarita@msalazarlaw.com
Ian Stewart	Wilson Elser Moskowitz Edelman &
Wilson Elser Moskowitz Edelman & Dicker LLP	Dicker LLP
Attorney for Defendant Kevin Halloran	555 South Flower St. Ste. 2900
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	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 **September 21, 2022**, at San Diego, California.

Cecilia Apodaca	Ceallalystan
Declarant	Signature
SA2020800072 / Separate Statment pos.docx	