

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 JOSHUA B. EISENBERG  
Supervising Deputy Attorney General  
4 MICHAEL YUN (SBN 292587)  
ETHAN A. TURNER (SBN 294891)  
5 GREGORY M. CRIBBS (SBN 175642)  
Deputy Attorneys General  
6 600 West Broadway, Suite 1800  
San Diego, CA 92101  
7 P.O. Box 85266  
San Diego, CA 92186-5266  
8 Telephone: (619) 321-5793  
Fax: (619) 645-2061  
9 E-mail: @doj.ca.gov  
Attorneys for Plaintiff  
10 Department of Cannabis Control

*Per Government Code § 6103, State of  
California is exempt from filing fee*

11  
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**  
14 **NORTH VALLEY DISTRICT-CHATSWORTH COURTHOUSE**  
15

16 **DEPARTMENT OF CANNABIS**  
17 **CONTROL,**

18 Plaintiff,

19 **v.**

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

27 Defendants.

Case No. 20CHCV00560

**DECLARATION OF LAURA MEEKS IN  
SUPPORT OF DEPARTMENT OF  
CANNABIS CONTROL'S MOTION  
FOR SUMMARY JUDGMENT**

Date: December 5, 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. 590950777530**

28 I, Laura Meeks, declare:

1           1.     I have personal knowledge of the information set forth herein below, all of which is  
2 true and correct of my own personal knowledge and belief, and if called upon to testify, I could  
3 and would competently testify thereto.

4           2.     I am currently employed as a Staff Services Manager II – Chief, in the CORI  
5 (Criminal Offender Record Information)/Ownership Review Office, with the Department of  
6 Cannabis Control. Assembly Bill 141 (AB 141) was signed into law and took effect on July 12,  
7 2021. Among the changes wrought by the bill was the consolidation of state agencies regulating  
8 commercial cannabis activity under a single agency entitled the Department of Cannabis Control  
9 (Department). As part of the consolidation, the licensing and business records of the three state  
10 agencies were combined and transferred to the Department. The Department is the state licensing  
11 entity with the sole authority to create, issue, deny, renew, discipline, condition, suspend, or  
12 revoke licenses for, among other things, the manufacturing and distribution of commercial  
13 cannabis and cannabis products.

14           3.     I have been a Staff Services Manager II – Chief since December of 2017, when I  
15 began employment with the Bureau of Cannabis Control (BCC) at its inception, and which  
16 consolidated into the Department effective July 12, 2021. I supervise, direct, monitor, and assign  
17 the workloads of professional managers and staff and I personally oversee all aspects of the  
18 Ownership Review of applicants seeking licensure, as well as, determine qualifications for  
19 licensure on behalf of the Department. In addition, I serve as the subject matter expert for  
20 licensing activities within the Department and I am also a subject matter expert as it relates to  
21 business ownership documents. From June of 2005 through December of 2017, prior to my  
22 employment with the Department, I was employed with the Department of Alcoholic Beverage  
23 Control as a Licensing Representative and Staff Services Manager. In those positions, I  
24 conducted investigations regarding original applicants and existing licenses for distribution and  
25 sale of alcoholic beverages, recommended approval and/or denial of licenses using established  
26 policies and guidelines, and advised staff regarding the filing and processing of complex license  
27 applications.

1           4. I am familiar with all aspects of licensing for the Department and I am intimately  
2 familiar with the Department's computer licensing systems, including but not limited to, the  
3 Department's manufacturing and distribution licensing records. As part of my official duties, I  
4 have access to, and conduct reviews of licensing application files for completeness and accuracy.  
5 The Department administers licensing standards to ensure applicants have satisfied the  
6 requirements to perform commercial cannabis activity in the State of California. The Licensing  
7 Unit verifies the ownership and qualifications of applicants to ensure that they meet the  
8 requirements that are set forth in statute and regulations. In exercising its licensing authority, the  
9 Department is directed that the protection of the public shall be the highest priority. Licensure of  
10 cannabis businesses is important to ensure that the applicable laws and regulations are followed  
11 and that only tested and safe cannabis products are made available to the public.

12           5. On or about March 14, 2018, the California Department of Public Health –  
13 Manufactured Cannabis Safety Branch (CDPH-MCSB) sent a cease and desist letter to Mr.  
14 Ruben Kachian, as the Chief Executive Officer of Vertical Bliss, Inc., stating that a complaint  
15 was received that he and/or Vertical Bliss, Inc. may be engaging in activity that violates state  
16 cannabis laws, and that, "Vertical Bliss must immediately cease all activity that violates state  
17 cannabis laws." A true and correct copy of the cease and desist letter dated March 14, 2018, is  
18 attached hereto and incorporated as Exhibit A.

19           6. On December 24, 2018, CDPH-MCSB issued a temporary, Type-6 manufacturing  
20 license (License No.: CDPH-T00001177) to Vertical Bliss, Inc. dba Kushy Punch, for the address  
21 located at 20500 Nordhoff Street, Chatsworth, California 91311. On the California Secretary of  
22 State Statement of Information form, Ruben Kachian is registered as the Chief Executive Officer  
23 for Vertical Bliss, Inc.

24           7. On December 27, 2018, Vertical Bliss, Inc., applied to CDPH-MCSB for a Type-6  
25 annual manufacturing license (Application No.: APL-1329), for the address located at 20500  
26 Nordhoff Street, Chatsworth, California 91311.

27           8. On June 27, 2019, CDPH-MCSB issued a provisional Type-6 manufacturing license  
28 (License No.: CDPH-10003574) and BCC issued a distribution license (License No.: C11-

0000544-LIC) to Vertical Bliss, Inc., for the address located at 20500 Nordhoff Street, Chatsworth, California 91311.

9. At the Department's request, and in my official capacity as custodian of records for the Department, I made a diligent, thorough, and complete search of the Department's manufacture and distribution licensing records for the addresses at 8415 and 8427 Canoga Avenue, Canoga Park, California, and the various individuals and entities set forth in the Complaint for Civil Penalties, Los Angeles County Superior Court, Chatsworth Courthouse, Case No. 20CHCV00560, and obtained the following results:

a. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with a business named Vertical Bliss, Inc.;

b. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with a business named Kushy Punch, Inc.;

c. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with a business named Conglomerate Marketing, LLC;

d. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with a business named More Agency, Inc.,

e. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with the name Ruben Kachian a.k.a. Ruben Cross;

f. The Department has never issued a Cannabis manufacture or distribution license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated with the name Arutyun Barsamyan;

1 g. The Department has never issued a Cannabis manufacture or distribution  
2 license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated  
3 with the name Kevin Halloran; and

4 h. The Department has never issued a Cannabis manufacture or distribution  
5 license to the addresses 8415 and 8427 Canoga Avenue, Canoga Park, California, and associated  
6 with the name Mike A. Toroyan.

7 10. Based upon my understanding and experience, the unlicensed manufacturing,  
8 distribution, and sale of illegal cannabis products, which occurred at 8427 Canoga Avenue,  
9 Canoga Park, California, circumvents the very purpose and intent of the Medicinal and Adult-Use  
10 Cannabis Regulation and Safety Act (MAUCRSA) by placing unregulated cannabis products into  
11 the cannabis market. Such unlicensed activity causes not only economic harm to California's  
12 legal commercial cannabis industry, but creates grave public health and safety risks to the public  
13 as those illegal cannabis products were untested and/or did not meet the safety standards under  
14 MAUCRSA and its implementing regulations.

15 I declare under penalty of perjury under the laws of the State of California, that the  
16 foregoing is true and correct.

17 Executed on September 16, 2022, at Sacramento, California.

18 Meeks, Laura@Cannabis Digitally signed by Meeks,  
19 Laura@Cannabis  
Date: 2022.09.16 12:40:45 -0700

20 LAURA MEEKS

21  
22  
23  
24  
25  
26  
27  
28 SA2020800072  
65355991.docx

# Exhibit A



KAREN L. SMITH, MD, MPH  
Director and State Public Health Officer

State of California—Health and Human Services Agency  
California Department of Public Health



EDMUND G. BROWN JR.  
Governor

14 March 2018

Mr. Ruben Kachian  
Chief Executive Officer  
Vertical Bliss, Inc.  
4712 Admiralty Way, Unit #269  
Marina Del Rey, California 90292

Certified Mail No.  
7017 1450 0000 8102 5357

RE: Activity in Violation of State Commercial Cannabis Laws

Dear Mr. Kachian:

The California Department of Public Health (CDPH) has received a complaint that your firm may be engaging in activity that violates state cannabis laws.

The complaint alleges that Vertical Bliss, Inc., (dba Kushy Punch) is an unlicensed manufacturer of cannabis edibles and vape cartridges at facilities located in Gardena, Canoga Park, and soon-to-be operating in Chatsworth. The Medicinal and Adult-use Cannabis Regulation and Safety Act (MAUCRSA) requires a valid state license from a state licensing authority to legally operate a commercial cannabis business within the State of California. This includes the manufacture of cannabis products for commercial sale.

You may obtain a temporary license for manufactured cannabis activities by downloading the application form and following the directions provided here:  
<https://www.cdph.ca.gov/Programs/CEH/DFDCS/MCSB/Pages/Applyforalicense.aspx>

You must have local authorization before you apply for a temporary state license. Your local licensing authority (local city or county in which you conduct business) licenses businesses engaged in commercial cannabis activity. You should be aware that the local authority may have specific zoning requirements for commercial cannabis activities, and likely will not authorize these activities in residential or other sensitive use areas. Accordingly, your local authority may require you to cease and desist these activities and move your operation to an area zoned for cannabis manufacturing.



Vertical Bliss must immediately cease all activity that violates state cannabis laws. Failure to do so may result in criminal and civil penalties for each violation as well as embargo and seizure of cannabis products.

If you have any questions regarding the State of California cannabis licensing requirements for manufacturing activities, you may call (855) 421-7887 or submit your question via email at [mcsb@cdph.ca.gov](mailto:mcsb@cdph.ca.gov).

Sincerely,



Asif Maan, Ph.D., Chief  
Manufactured Cannabis Safety Branch  
California Department of Public Health

cc: Mr. Joseph M. Nicchitta  
Los Angeles County  
500 W. Temple St. Suite 726  
Los Angeles, CA 90012

Ms. Cat Packer  
Department of Cannabis Regulation  
City of Los Angeles  
221 North Figueroa Street, Suite 1245  
Los Angeles, California 90012

Ms. Lisa Kranitz, Esq  
City of Gardena  
1700 West 162<sup>nd</sup> St.  
Gardena, CA 90247



**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 **September 21, 2022**, I served the attached **DECLARATION OF LAURA MEEKS 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:

<b>Party</b>	<b>Address</b>
Margarita Salazar, Esq. <i>Attorney for Defendants Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC., More Agency, Inc., Ruben Kachian, 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 <b>E-mail Address:</b> margarita@msalazarlaw.com
Ian Stewart Wilson Elser Moskowitz Edelman & Dicker LLP <i>Attorney for Defendant Kevin Halloran</i>	Wilson Elser Moskowitz Edelman & Dicker LLP 555 South Flower St. Ste. 2900 Los Angeles, Ca 90071 <b>E-mail Address:</b> 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

Declarant



Signature