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

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**
12 **NORTH VALLEY DISTRICT – CHATSWORTH COURTHOUSE**
13

14
15 **DEPARTMENT OF CANNABIS**
16 **CONTROL,**

17 Plaintiff,

18 v.

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

27 Defendants.
28

Case No. 20CHCV00560

**DECLARATION OF DEPUTY
ATTORNEY GENERAL MICHAEL YUN
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

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1 I, Michael Yun, 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 one of the Deputy Attorneys General (hereinafter, “DAG”) assigned to represent
4 Plaintiff Department of Cannabis Control (hereinafter “Plaintiff” or “DCC”) in the above-entitled
5 matter. I have personal knowledge of the information set forth herein below, based on my own
6 personal knowledge and belief that the following evidence, declarations, exhibits and writings are
7 true and correct. If called as a witness in this proceeding, I could truthfully testify to the
8 following:

9 2. As part of my assignment to this case as counsel for Plaintiff, I have reviewed and am
10 familiar with the following documents:

- 11 a. The document entitled “Plaintiff California Department of Public Health’s
12 Request for Admission to Defendant **Ruben Kachian aka Ruben Cross**, Set
13 One,” propounded by Plaintiff on June 14, 2021. A true and correct copy is
14 attached to this declaration as Exhibit 1.
- 15 b. The document entitled “Plaintiff California Department of Public Health’s
16 Request for Admission to Defendant **Vertical Bliss, Inc.**, Set One,” propounded
17 by Plaintiff on June 14, 2021. A true and correct copy is attached to this
18 declaration as Exhibit 2.
- 19 c. The document entitled “Vertical Bliss, Inc.’s Responses to Plaintiff’s Requests
20 for Admission, Set One,” provided by then counsel of record Browne, George,
21 Ross, O’Brien, Annaguey & Ellis, LLP (hereinafter, “BGR”) on November 1,
22 2021. A true and correct copy is attached to this declaration as Exhibit 3.
- 23 d. The document entitled “Plaintiff California Department of Public Health’s
24 Request for Admission to Defendant **Kushy Punch, Inc.**, Set One,” propounded
25 by Plaintiff on June 14, 2021. A true and correct copy is attached to this
26 declaration as Exhibit 4.

- 1 e. The document entitled “Kushy Punch, Inc.’s Responses to Plaintiff’s Requests
2 for Admission, Set One,” provided by BGR on November 1, 2021. A true and
3 correct copy is attached to this declaration as Exhibit 5.
- 4 f. The document entitled “Plaintiff California Department of Public Health’s
5 Request for Admission to Defendant **Conglomerate Marketing, LLC**, Set
6 One,” propounded by Plaintiff on June 14, 2021. A true and correct copy is
7 attached to this declaration as Exhibit 6.
- 8 g. The document entitled “Conglomerate Marketing, LLC’s Responses to
9 Plaintiff’s Requests for Admission, Set One,” provided by BGR on November 1,
10 2021. A true and correct copy is attached to this declaration as Exhibit 7.
- 11 h. The document entitled “Plaintiff California Department of Public Health’s
12 Request for Admission to Defendant **More Agency, Inc.**, Set One,” propounded
13 by Plaintiff on June 14, 2021. A true and correct copy is attached to this
14 declaration as Exhibit 8.
- 15 i. The document entitled “More Agency, Inc.’s Responses to Plaintiff’s Requests
16 for Admission, Set One,” provided by BGR on November 1, 2021. A true and
17 correct copy is attached to this declaration as Exhibit 9.
- 18 j. The document entitled “Plaintiff California Department of Public Health’s
19 Request for Admission to Defendant **Arutyun Barsamyan**, Set One,”
20 propounded by Plaintiff on June 14, 2021. A true and correct copy is attached to
21 this declaration as Exhibit 10.
- 22 k. The document entitled “Arutyun Barsamyan’s Responses to Plaintiff’s Requests
23 for Admission, Set One,” provided by BGR on November 1, 2021. A true and
24 correct copy is attached to this declaration as Exhibit 11.
- 25 l. The document entitled “Plaintiff California Department of Public Health’s
26 Request for Admission to Defendant **Mike A. Toroyan**, Set One,” propounded
27 by Plaintiff on June 14, 2021. A true and correct copy is attached to this
28 declaration as Exhibit 12.

1 m. The document entitled “Mike A. Toroyan’s Responses to Plaintiff’s Requests
2 for Admission, Set One,” provided by BGR on November 1, 2021. A true and
3 correct copy is attached to this declaration as Exhibit 13.

4 3. On February 4, 2022, I caused to be served on Margarita Salazar (hereinafter,
5 “Salazar”), counsel for Defendants Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate
6 Marketing, LLC, More Agency, Inc., Arutyun Barsamyan, and Mike A. Toroyan, , the Notice of
7 Motion, Motion and Memorandum of Points and Authorities in Support of Motion to Compel
8 Further Responses to Interrogatories, Set One, Requests for Production, Set One, and Motion for
9 Court to Deem Requests for Admissions, Set One Admitted (hereinafter, “Motions to Compel
10 Further Responses”) as to each of those six Defendants.¹

11 4. On February 4, 2022, this Office filed with this Court the Motion to Compel Further
12 Responses as to Defendant Kushy Punch, Inc.

13 5. On February 7, 2022, this Office filed with this Court the Motions to Compel Further
14 Responses as to Defendants Vertical Bliss, Inc., Conglomerate Marketing, LLC, More Agency,
15 Inc., Arutyun Barsamyan, and Mike A. Toroyan.

16 6. On March 16, 2022, the Motion to Compel Further Responses as to Defendant
17 Vertical Bliss, Inc. was called for hearing in this Court. Salazar appeared by telephone and did
18 not oppose Plaintiff’s Motion to Compel Further Responses orally or in writing. The Court took
19 the matter under submission, adopted its tentative ruling, and issued its final order in the form of a
20 minute order. A true and correct copy of the Court Order, dated March 16, 2022 is attached
21 hereto as Exhibit 14.

22 7. On May 26, 2022, five Motions to Compel Further Responses from Defendants
23 Kushy Punch, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Arutyun Barsamyan, and
24 Mike A. Toroyan were called for hearing in this Court. Neither Salazar nor any of the five
25 Defendants appeared in court. The motions were unopposed. The Court took the matters under
26

27 ¹ See “Declaration of Service” attached to each of the six Motions to Compel Further
28 Responses filed with this Court on February 4, 2022, as to Defendant Kushy Punch, Inc. and on
February 7, 2022, as to Defendants Vertical Bliss, Inc., Conglomerate Marketing, LLC, More
Agency, Inc., Arutyun Barsamyan, and Mike A. Toroyan, which are part of this Court’s record.

1 submission, adopted its tentative ruling, and issued its final order as to each motion in the form of
2 a minute order. A true and correct copy of the Court Order, dated May 26, 2022 is attached
3 hereto as Exhibit 15.

4 8. As of the date of this declaration, Salazar and all Defendants named in DCC's Motion
5 for Summary Judgment have failed to provide the Court ordered further responses, including
6 Plaintiff's Requests for Admissions. Neither have Defendants and Salazar provided any
7 justification for the failure to provide further responses in violation of the Court's discovery
8 orders.

9 This declaration is executed under penalty of perjury under the laws of the State of
10 California this 21st day of September, 2022, at Los Angeles, California.

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13 MICHAEL J. YUN
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Exhibit 1

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
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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 ///

1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit that YOU were the Sole Director of More Agency, Inc. in the period from April 23,
3 2018 to October 2, 2019.

4 **REQUEST FOR ADMISSION NO. 7:**

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

7 **REQUEST FOR ADMISSION NO. 8:**

8 Admit that YOU were an OWNER of Vertical Bliss, Inc. in the period from April 23,
9 2018 to October 2, 2019.

10 **REQUEST FOR ADMISSION NO. 9:**

11 Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23,
12 2018 to October 2, 2019.

13 **REQUEST FOR ADMISSION NO. 10:**

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

16 **REQUEST FOR ADMISSION NO. 11:**

17 Admit that YOU were an OWNER of Kushy Punch, Inc. in the period from April 23,
18 2018 to October 2, 2019.

19 **REQUEST FOR ADMISSION NO. 12:**

20 Admit that YOU were a SUPERVISOR of Kushy Punch, Inc. in the period from April 23,
21 2018 to October 2, 2019.

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

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

25 **REQUEST FOR ADMISSION NO. 14:**

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

28 ///

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

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:

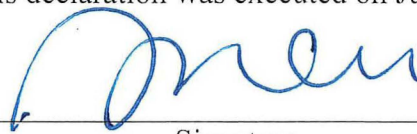
I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General 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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT RUBEN KACHIAN aka RUBEN CROSS, SET ONE** 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
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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
22 MARKETING, LLC, MORE AGENCY,
23 INC., RUBEN KACHIAN aka RUBEN
24 CROSS, ARUTYUN BARSAMYAN,
25 KEVIN HALLORAN, MIKE A.
26 TOROYAN, and DOES 1 through 30,
27 inclusive,**

28 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT VERTICAL BLISS, INC.,
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: VERTICAL BLISS, INC.

3 SET ONE

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

8 **DEFINITIONS**

9
10 1. "YOU" refers to Responding Party, its agents, employees, and anyone else acting on its
11 behalf.

12 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
13 CA 91304.

14 3. "COMMERCIAL CANNABIS LICENSE" refers to a state license issued pursuant to
15 Division 10 of the Business and Professions Code by the California Department of Public
16 Health's Manufactured Cannabis Safety Branch or the Bureau of Cannabis Control permitting a
17 licensee to engage in COMMERCIAL CANNABIS ACTIVITY at a particular location or
18 premises as identified in Business and Professions Code section 26001, subdivision (y), and
19 encompasses "A-License" and "M-license," as identified in Business and Professions Code
20 section 26001, subdivisions (a) and (ae).

21 4. "COMMERCIAL CANNABIS ACTIVITY" refers to the cultivation, possession,
22 manufacture, distribution, processing, storing, laboratory testing, packaging, labeling,
23 transportation, delivery, or sale of CANNABIS and CANNABIS PRODUCTS, as identified in
24 Business and Professions Code section 26001, subdivision (k).

25 5. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
26 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
27 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
28 derivative, mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,

1 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code
2 section 26001, subdivision (f).

3 6. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
4 whereby the plant material has been transformed into a concentrate, including, but not limited to,
5 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
6 cannabis or other ingredients, as identified in Business and Professions Code section 26001,
7 subdivision (i), Health and Safety Code, section 11018.1, and Cal. Code Regs., tit. 17, section
8 40100, subdivision (j).

9 7. "COMMERCIAL MANUFACTURING CANNABIS ACTIVITY" refers to
10 compounding, blending, extracting, infusing, or otherwise making or preparing a CANNABIS
11 PRODUCT; the production, preparation, propagation, or compounding of CANNABIS or
12 CANNABIS PRODUCTS either directly or indirectly or by extraction methods, or independently
13 by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a
14 fixed location that packages or repackages CANNABIS or CANNABIS PRODUCT or labels or
15 relabels its container; to all aspects of the extraction process, infusion process, and packaging and
16 labeling processes, including processing, preparing, holding, and storing of CANNABIS
17 PRODUCTS; and also includes any processing, preparing, holding, or storing of components and
18 ingredients of CANNABIS PRODUCTS, as identified in Business and Professions Code section
19 26001, subdivisions (ag) and (ah), and Cal. Code Regs., tit. 17 section 40100, subdivisions (dd)
20 and (ee).

21 8. "COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY" refers to the procurement,
22 sale, and transport of CANNABIS and CANNABIS PRODUCTS between parties required to
23 hold a COMMERCIAL CANNABIS LICENSE, as identified in Business and Professions Code
24 section 26001, subdivision (r) and Cal. Code Regs., tit. 17 section 40100, subdivision (p).

25 9. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
26 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
27 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
28 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING

1 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS
2 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-
3 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
4 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
5 identified in Cal. Code Regs. tit. 17 section 40152.

6 10. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
7 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
8 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
9 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
10 combination of extraction and chemical synthesis at a fixed location that packages or repackages
11 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
12 extraction process, infusion process, and packaging and labeling processes, including processing,
13 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
14 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
15 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
16 Code Regs., tit. 17, section 40100, subdivisions (dd) and (ee).

17 REQUESTS FOR ADMISSION

18 REQUEST FOR ADMISSION NO. 1:

19 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
20 2019.

21 REQUEST FOR ADMISSION NO. 2:

22 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
23 2019.

24 REQUEST FOR ADMISSION NO. 3:

25 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
26 to October 2, 2019.

27 REQUEST FOR ADMISSION NO. 4:

28 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in

1 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period
2 from April 23, 2018 to October 2, 2019.

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

4 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
5 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2,
6 2019.

7 **REQUEST FOR ADMISSION NO. 6:**

8 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
9 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
10 October 2, 2019.

11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
13 ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
14 October 2, 2019.

15 **REQUEST FOR ADMISSION NO. 8:**

16 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
17 ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
18 October 2, 2019.

19 **REQUEST FOR ADMISSION NO. 9:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
22 October 2, 2019.

23 **REQUEST FOR ADMISSION NO. 10:**

24 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
25 ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **REQUEST FOR ADMISSION NO. 11:**

28 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS

1 ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
2 October 2, 2019.

3 **REQUEST FOR ADMISSION NO. 12:**

4 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
5 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to
6 October 2, 2019.

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

8 Admit that the GROSS REVENUE YOU received from COMMERCIAL
9 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
10 2018 to April 22, 2019 exceeded \$100,001.

11 **REQUEST FOR ADMISSION NO. 14:**

12 Admit that the GROSS REVENUE YOU received from COMMERCIAL
13 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
14 2018 to April 22, 2019 exceeded \$500,001.

15 **REQUEST FOR ADMISSION NO. 15:**

16 Admit that the GROSS REVENUE YOU received from COMMERCIAL
17 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
18 2018 to April 22, 2019 exceeded \$1,500,001.

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

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **REQUEST FOR ADMISSION NO. 17:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL
25 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
26 2018 to April 22, 2019 exceeded \$5,000,001.

27 **REQUEST FOR ADMISSION NO. 18:**

28 Admit that the GROSS REVENUE YOU received from COMMERCIAL

1 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
2 2018 to April 22, 2019 exceeded \$10,000,000.

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

4 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
5 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
6 period from April 23, 2018 to October 2, 2019.

7 **REQUEST FOR ADMISSION NO. 20:**

8 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
9 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

10 **REQUEST FOR ADMISSION NO. 21:**

11 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
12 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
13 October 2, 2019.

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

15 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
16 at, to, or from the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
17 October 2, 2019.

18 **REQUEST FOR ADMISSION NO. 23:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
24 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
25 October 2, 2019.

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

27 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
28 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to

October 2, 2019.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 27:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 28:

Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$1,000,000.

REQUEST FOR ADMISSION NO. 29:

Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$2,500,000.

REQUEST FOR ADMISSION NO. 30:

Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$5,000,000.

REQUEST FOR ADMISSION NO. 31

Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$10,000,000.

REQUEST FOR ADMISSION NO. 32:

Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April

23, 2018 to April 22, 2019 was more than \$20,000,000.

REQUEST FOR ADMISSION NO. 33:

Admit that the GROSS REVENUE YOU received from COMMERCIAL
DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
April 22, 2019 was more than \$30,000,000.

REQUEST FOR ADMISSION NO. 34:

Admit that the GROSS REVENUE YOU received from COMMERCIAL
DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
April 22, 2019 was more than \$50,000,000.

REQUEST FOR ADMISSION NO. 35:

Admit that the GROSS REVENUE YOU received from COMMERCIAL
DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
April 22, 2019 was more than \$70,000,000.

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*

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RFA Vertical Bliss.docx

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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT VERTICAL BLISS, INC., SET ONE** 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 3

1 BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
2 Ivy A. Wang (State Bar No. 224899)
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
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24
25
26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**VERTICAL BLISS, INC.'S RESPONSES
TO PLAINTIFF'S REQUESTS FOR
ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

Action Filed: September 23, 2020

Trial Date: June 13, 2022

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: VERTICAL BLISS, INC.

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

25 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
26 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
8 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

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

17 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
18 to October 2, 2019.

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

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

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

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Responding Party objects to this request on the following grounds: (1) it is overbroad,
4 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
5 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
6 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
7 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
8 given the broad scope of the request.

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

10 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
11 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 50 separate days, at some point in the period from April
22 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 100 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 8:**

14 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
15 ACTIVITY at the PREMISES, on at least 200 separate days, at some point in the period from
16 April 23, 2018 to October 2, 2019.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 9:**

25 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
26 ACTIVITY at the PREMISES, on at least 300 separate days, at some point in the period from
27 April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
10 ACTIVITY at the PREMISES, on at least 400 separate days, at some point in the period from
11 April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 11:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 500 separate days, at some point in the period from
22 April 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 527 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$100,001.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit that the GROSS REVENUE YOU received from COMMERCIAL
26 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
27 2018 to April 22, 2019 exceeded \$500,001.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the GROSS REVENUE YOU received from COMMERCIAL
10 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
11 2018 to April 22, 2019 exceeded \$1,500,001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

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

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that the GROSS REVENUE YOU received from COMMERCIAL
4 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5 2018 to April 22, 2019 exceeded \$5,000,001.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$10,000,000.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

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

25 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
26 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
27 period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 20:**

9 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
10 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

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

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 23:**

13 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
14 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
15 October 2, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 24:**

24 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
25 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
4 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 28:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
15 22, 2019 was more than \$1,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 29:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
26 22, 2019 was more than \$2,500,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 30:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
9 22, 2019 was more than \$5,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 31:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
19 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
20 22, 2019 was more than \$10,000,000.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
3 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
4 22, 2019 was more than \$20,000,000.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
15 was more than \$30,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 34:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
26 was more than \$50,000,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 35:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
9 was more than \$70,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17
18 DATED: November 1, 2021

Respectfully submitted,

19 BROWNE GEORGE ROSS
20 O'BRIEN ANNAGUEY & ELLIS LLP
21 Ivy A. Wang
22 David J. Carroll

23 By: /s/ David J. Carroll

24 David J. Carroll

25 Attorneys for Defendants Vertical Bliss, Inc., Kushy
26 Punch, Inc., Conglomerate Marketing LLC, More
27 Agency, Inc., Arutyun Barsamyan, and Mike A.
28 Toroyan

Exhibit 4

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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,**

Plaintiffs,

18 v.
19

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

24 Defendants.
25

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT KUSHY PUNCH, INC.,
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: KUSHY PUNCH, INC.

3 SET ONE

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

8 **DEFINITIONS**

9 1. "YOU" refers to Responding Party, its agents, employees, and anyone else acting on its
10 behalf.

11 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
12 CA 91304.

13 3. "COMMERCIAL CANNABIS LICENSE" refers to a state license issued pursuant to
14 Division 10 of the Business and Professions Code by the California Department of Public
15 Health's Manufactured Cannabis Safety Branch or the Bureau of Cannabis Control permitting a
16 licensee to engage in COMMERCIAL CANNABIS ACTIVITY at a particular location or
17 premises as identified in Business and Professions Code section 26001, subdivision (y), and
18 encompasses "A-License" and "M-license," as identified in Business and Professions Code
19 section 26001, subdivisions (a) and (ae).

20 4. "COMMERCIAL CANNABIS ACTIVITY" refers to the cultivation, possession,
21 manufacture, distribution, processing, storing, laboratory testing, packaging, labeling,
22 transportation, delivery, or sale of CANNABIS and CANNABIS PRODUCTS, as identified in
23 Business and Professions Code section 26001, subdivision (k).

24 5. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
25 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
26 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
27 derivative; mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,
28 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code

1 section 26001, subdivision (f).

2 6. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
3 whereby the plant material has been transformed into a concentrate, including, but not limited to,
4 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
5 cannabis or other ingredients, as identified in Business and Professions Code section 26001,
6 subdivision (i), Health and Safety Code section 11018.1, and Cal. Code Regs., tit. 17 section
7 40100, subdivision (j).

8 7. "COMMERCIAL MANUFACTURING CANNABIS ACTIVITY" refers to
9 compounding, blending, extracting, infusing, or otherwise making or preparing a CANNABIS
10 PRODUCT; the production, preparation, propagation, or compounding of CANNABIS or
11 CANNABIS PRODUCTS either directly or indirectly or by extraction methods, or independently
12 by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a
13 fixed location that packages or repackages CANNABIS or CANNABIS PRODUCT or labels or
14 relabels its container; to all aspects of the extraction process, infusion process, and packaging and
15 labeling processes, including processing, preparing, holding, and storing of CANNABIS
16 PRODUCTS; and also includes any processing, preparing, holding, or storing of components and
17 ingredients of CANNABIS PRODUCTS, as identified in Business and Professions Code section
18 26001, subdivisions (ag) and (ah), and Cal. Code Regs., tit. 17 section 40100, subdivisions (dd)
19 and (ee).

20 8. "COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY" refers to the procurement,
21 sale, and transport of CANNABIS and CANNABIS PRODUCTS between parties required to
22 hold a COMMERCIAL CANNABIS LICENSE, as identified in Business and Professions Code
23 section 26001, subdivision (r) and Cal. Code Regs., tit. 17 section 40100, subdivision (p).

24 9. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
25 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
26 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
27 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING
28 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS

1 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-
2 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
3 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
4 identified in Cal. Code Regs. tit. 17 section 40152.

5 10. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
6 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
7 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
8 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
9 combination of extraction and chemical synthesis at a fixed location that packages or repackages
10 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
11 extraction process, infusion process, and packaging and labeling processes, including processing,
12 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
13 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
14 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
15 Code Regs., tit. 17 section 40100, subdivisions (dd) and (ee).

16 REQUESTS FOR ADMISSION

17 REQUEST FOR ADMISSION NO. 1:

18 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
19 2019.

20 REQUEST FOR ADMISSION NO. 2:

21 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
22 2019.

23 REQUEST FOR ADMISSION NO. 3:

24 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
25 to October 2, 2019.

26 REQUEST FOR ADMISSION NO. 4:

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

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

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2,
5 2019.

6 **REQUEST FOR ADMISSION NO. 6:**

7 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
8 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **REQUEST FOR ADMISSION NO. 7:**

11 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
12 ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
13 October 2, 2019.

14 **REQUEST FOR ADMISSION NO. 8:**

15 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
16 ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
17 October 2, 2019.

18 **REQUEST FOR ADMISSION NO. 9:**

19 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
20 ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **REQUEST FOR ADMISSION NO. 10:**

23 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
24 ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
25 October 2, 2019.

26 **REQUEST FOR ADMISSION NO. 11:**

27 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
28 ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to

1 October 2, 2019.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to
5 October 2, 2019.

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

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL
8 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
9 2018 to April 22, 2019 exceeded \$100,001.

10 **REQUEST FOR ADMISSION NO. 14:**

11 Admit that the GROSS REVENUE YOU received from COMMERCIAL
12 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
13 2018 to April 22, 2019 exceeded \$500,001.

14 **REQUEST FOR ADMISSION NO. 15:**

15 Admit that the GROSS REVENUE YOU received from COMMERCIAL
16 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
17 2018 to April 22, 2019 exceeded \$1,500,001.

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

19 Admit that the GROSS REVENUE YOU received from COMMERCIAL
20 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
21 22, 2019 exceeded \$3,000,001.

22 **REQUEST FOR ADMISSION NO. 17:**

23 Admit that the GROSS REVENUE YOU received from COMMERCIAL
24 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
25 2018 to April 22, 2019 exceeded \$5,000,001.

26 **REQUEST FOR ADMISSION NO. 18:**

27 Admit that the GROSS REVENUE YOU received from COMMERCIAL
28 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5

1 2018 to April 22, 2019 exceeded \$10,000,000.

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

3 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
4 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
5 period from April 23, 2018 to October 2, 2019.

6 **REQUEST FOR ADMISSION NO. 20:**

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

9 **REQUEST FOR ADMISSION NO. 21:**

10 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
11 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
12 October 2, 2019.

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

14 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
15 at, to, or from the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
16 October 2, 2019.

17 **REQUEST FOR ADMISSION NO. 23:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **REQUEST FOR ADMISSION NO. 24:**

22 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
23 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
24 October 2, 2019.

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

26 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
27 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
28 October 2, 2019.

1 **REQUEST FOR ADMISSION NO. 26:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **REQUEST FOR ADMISSION NO. 27:**

6 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
7 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
8 2, 2019.

9 **REQUEST FOR ADMISSION NO. 28:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
12 23, 2018 to April 22, 2019 was more than \$1,000,000.

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
16 23, 2018 to April 22, 2019 was more than \$2,500,000.

17 **REQUEST FOR ADMISSION NO. 30:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
20 23, 2018 to April 22, 2019 was more than \$5,000,000.

21 **REQUEST FOR ADMISSION NO. 31**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
24 23, 2018 to April 22, 2019 was more than \$10,000,000.

25 **REQUEST FOR ADMISSION NO. 32:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
28 23, 2018 to April 22, 2019 was more than \$20,000,000.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL
3 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
4 April 22, 2019 was more than \$30,000,000.

5 **REQUEST FOR ADMISSION NO. 34:**

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
8 April 22, 2019 was more than \$50,000,000.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
12 April 22, 2019 was more than \$70,000,000.

13
14 Dated: June 14, 2021

Respectfully Submitted,

15 ROB BONTA
16 Attorney General of California
17 HARINDER KAPUR
18 Senior Assistant Attorney General

19 *Patrick Boyne*

20 PATRICK BOYNE
21 Deputy Attorney General
22 *Attorneys for Plaintiffs California*
23 *Department of Public Health and Bureau*
24 *of Cannabis Control*

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28

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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT KUSHY PUNCH, INC, SET ONE** 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 5

1 BROWNE GEORGE ROSS
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
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Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT KUSHY PUNCH, INC.'S
RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

Action Filed: September 23, 2020

Trial Date: June 13, 2022

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: KUSHY PUNCH, INC.

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

25 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
26 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
8 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

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

17 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
18 to October 2, 2019.

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

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

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

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Responding Party objects to this request on the following grounds: (1) it is overbroad,
4 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
5 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
6 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
7 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
8 given the broad scope of the request.

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

10 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
11 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
22 October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
5 October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 8:**

14 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
15 ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
16 October 2, 2019.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 9:**

25 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
26 ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
27 October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
10 ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
11 October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 11:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
22 October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
5 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$100,001.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit that the GROSS REVENUE YOU received from COMMERCIAL
26 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
27 2018 to April 22, 2019 exceeded \$500,001.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the GROSS REVENUE YOU received from COMMERCIAL
10 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
11 2018 to April 22, 2019 exceeded \$1,500,001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

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

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that the GROSS REVENUE YOU received from COMMERCIAL
4 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5 2018 to April 22, 2019 exceeded \$5,000,001.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018
16 to April 22, 2019 exceeded \$10,000,000.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

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

25 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
26 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
27 period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 20:**

9 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
10 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

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

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 23:**

13 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
14 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
15 October 2, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 24:**

24 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
25 at, to, or from the PREMISES, on at least .300 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
4 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 28:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
15 22, 2019 was more than \$1,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 29:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
26 22, 2019 was more than \$2,500,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 30:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
9 22, 2019 was more than \$5,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 31:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
19 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
20 22, 2019 was more than \$10,000,000.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
3 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
4 22, 2019 was more than \$20,000,000.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
15 was more than \$30,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 34:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
26 was more than \$50,000,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 35:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
9 was more than \$70,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17
18 DATED: November 1, 2021

Respectfully submitted,

19 BROWNE GEORGE ROSS
20 O'BRIEN ANNAGUEY & ELLIS LLP

Ivy A. Wang
David J. Carroll

21
22
23 By: /s/ David J. Carroll

David J. Carroll

24 Attorneys for Defendants Vertical Bliss, Inc., Kushy
25 Punch, Inc., Conglomerate Marketing LLC, More
26 Agency, Inc., Arutyun Barsamyan, and Mike A.
27 Toroyan
28

Exhibit 6

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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
22 MARKETING, LLC, MORE AGENCY,
INC., RUBEN KACHIAN aka RUBEN
23 CROSS, ARUTYUN BARSAMYAN,
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 CONGLOMERATE
MARKETING, LLC, 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: CONGLOMERATE MARKETING, LLC

3 SET ONE

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

7 **DEFINITIONS**

8 1. "YOU" refers to Responding Party, its agents, employees, and anyone else acting on its
9 behalf.

10 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
11 CA 91304.

12 3. "COMMERCIAL CANNABIS LICENSE" refers to a state license issued pursuant to
13 Division 10 of the Business and Professions Code by the California Department of Public
14 Health's Manufactured Cannabis Safety Branch or the Bureau of Cannabis Control permitting a
15 licensee to engage in COMMERCIAL CANNABIS ACTIVITY at a particular location or
16 premises as identified in Business and Professions Code section 26001, subdivision (y), and
17 encompasses "A-License" and "M-license," as identified in Business and Professions Code
18 section 26001, subdivisions (a) and (ae).

19 4. "COMMERCIAL CANNABIS ACTIVITY" refers to the cultivation, possession,
20 manufacture, distribution, processing, storing, laboratory testing, packaging, labeling,
21 transportation, delivery, or sale of CANNABIS and CANNABIS PRODUCTS, as identified in
22 Business and Professions Code section 26001, subdivision (k).

23 5. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
24 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
25 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
26 derivative, mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,
27 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code
28 section 26001, subdivision (f).

1 6. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
2 whereby the plant material has been transformed into a concentrate, including, but not limited to,
3 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
4 cannabis or other ingredients; as identified in Business and Professions Code section 26001,
5 subdivision (i), Health and Safety Code section 11018.1, and Cal. Code Regs., tit. 17 section
6 40100, subdivision (j).

7 7. "COMMERCIAL MANUFACTURING CANNABIS ACTIVITY" refers to
8 compounding, blending, extracting, infusing, or otherwise making or preparing a CANNABIS
9 PRODUCT; the production, preparation, propagation, or compounding of CANNABIS or
10 CANNABIS PRODUCTS either directly or indirectly or by extraction methods, or independently
11 by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a
12 fixed location that packages or repackages CANNABIS or CANNABIS PRODUCT or labels or
13 relabels its container; to all aspects of the extraction process, infusion process, and packaging and
14 labeling processes, including processing, preparing, holding, and storing of CANNABIS
15 PRODUCTS; and also includes any processing, preparing, holding, or storing of components and
16 ingredients of CANNABIS PRODUCTS, as identified in Business and Professions Code section
17 26001, subdivisions (ag) and (ah), and Cal. Code Regs., tit. 17 section 40100, subdivisions (dd)
18 and (ee).

19 8. "COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY" refers to the procurement,
20 sale, and transport of CANNABIS and CANNABIS PRODUCTS between parties required to
21 hold a COMMERCIAL CANNABIS LICENSE, as identified in Business and Professions Code
22 section 26001, subdivision (r) and Cal. Code Regs., tit. 17 section 40100, subdivision (p).

23 9. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
24 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
25 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
26 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING
27 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS
28 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-

1 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
2 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
3 identified in Cal. Code Regs. tit. 17 section 40152.

4 10. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
5 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
6 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
7 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
8 combination of extraction and chemical synthesis at a fixed location that packages or repackages
9 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
10 extraction process, infusion process, and packaging and labeling processes, including processing,
11 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
12 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
13 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
14 Code Regs., tit. 17 section 40100, subdivisions (dd) and (ee).

15 16 REQUESTS FOR ADMISSION

17 REQUEST FOR ADMISSION NO. 1:

18 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
19 2019.

20 REQUEST FOR ADMISSION NO. 2:

21 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
22 2019.

23 REQUEST FOR ADMISSION NO. 3:

24 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
25 to October 2, 2019.

26 REQUEST FOR ADMISSION NO. 4:

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

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

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2,
5 2019.

6 **REQUEST FOR ADMISSION NO. 6:**

7 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
8 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **REQUEST FOR ADMISSION NO. 7:**

11 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
12 ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
13 October 2, 2019.

14 **REQUEST FOR ADMISSION NO. 8:**

15 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
16 ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
17 October 2, 2019.

18 **REQUEST FOR ADMISSION NO. 9:**

19 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
20 ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **REQUEST FOR ADMISSION NO. 10:**

23 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
24 ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
25 October 2, 2019.

26 **REQUEST FOR ADMISSION NO. 11:**

27 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
28 ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to

1 October 2, 2019.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to
5 October 2, 2019.

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

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL
8 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
9 2018 to April 22, 2019 exceeded \$100,001.

10 **REQUEST FOR ADMISSION NO. 14:**

11 Admit that the GROSS REVENUE YOU received from COMMERCIAL
12 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
13 2018 to April 22, 2019 exceeded \$500,001.

14 **REQUEST FOR ADMISSION NO. 15:**

15 Admit that the GROSS REVENUE YOU received from COMMERCIAL
16 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
17 2018 to April 22, 2019 exceeded \$1,500,001.

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

19 Admit that the GROSS REVENUE YOU received from COMMERCIAL
20 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
21 22, 2019 exceeded \$3,000,001.

22 **REQUEST FOR ADMISSION NO. 17:**

23 Admit that the GROSS REVENUE YOU received from COMMERCIAL
24 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
25 2018 to April 22, 2019 exceeded \$5,000,001.

26 **REQUEST FOR ADMISSION NO. 18:**

27 Admit that the GROSS REVENUE YOU received from COMMERCIAL
28 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,

1 2018 to April 22, 2019 exceeded \$10,000,000.

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

3 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
4 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
5 period from April 23, 2018 to October 2, 2019.

6 **REQUEST FOR ADMISSION NO. 20:**

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

9 **REQUEST FOR ADMISSION NO. 21:**

10 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
11 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
12 October 2, 2019.

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

14 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
15 at, to, or from the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
16 October 2, 2019.

17 **REQUEST FOR ADMISSION NO. 23:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **REQUEST FOR ADMISSION NO. 24:**

22 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
23 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
24 October 2, 2019.

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

26 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
27 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
28 October 2, 2019.

1 **REQUEST FOR ADMISSION NO. 26:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **REQUEST FOR ADMISSION NO. 27:**

6 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
7 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
8 2, 2019.

9 **REQUEST FOR ADMISSION NO. 28:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
12 23, 2018 to April 22, 2019 was more than \$1,000,000.

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
16 23, 2018 to April 22, 2019 was more than \$2,500,000.

17 **REQUEST FOR ADMISSION NO. 30:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
20 23, 2018 to April 22, 2019 was more than \$5,000,000.

21 **REQUEST FOR ADMISSION NO. 31**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
24 23, 2018 to April 22, 2019 was more than \$10,000,000.

25 **REQUEST FOR ADMISSION NO. 32:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
28 23, 2018 to April 22, 2019 was more than \$20,000,000.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL
3 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
4 April 22, 2019 was more than \$30,000,000.

5 **REQUEST FOR ADMISSION NO. 34:**

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
8 April 22, 2019 was more than \$50,000,000.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
12 April 22, 2019 was more than \$70,000,000.

13
14
15 Dated: June 14, 2021

Respectfully Submitted,

16 ROB BONTA
17 Attorney General of California
18 HARINDER KAPUR
19 Senior Assistant Attorney General

Patrick Boyne

20 PATRICK BOYNE
21 Deputy Attorney General
22 *Attorneys for Plaintiffs California*
23 *Department of Public Health and Bureau*
24 *of Cannabis Control*

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27
28

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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT CONGLOMERATE MARKETING, LLC, SET ONE** 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 7

1 BROWNE GEORGE ROSS
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
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28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT CONGLOMERATE
MARKETING, LLC'S RESPONSES TO
PLAINTIFF'S REQUESTS FOR
ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

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

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: CONGLOMERATE MARKETING, LLC

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

25 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
26 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
8 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

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

17 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
18 to October 2, 2019.

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

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

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

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Responding Party objects to this request on the following grounds: (1) it is overbroad,
4 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
5 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
6 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
7 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
8 given the broad scope of the request.

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

10 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
11 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
22 October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
5 October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 8:**

14 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
15 ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
16 October 2, 2019.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 9:**

25 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
26 ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
27 October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
10 ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
11 October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 11:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
22 October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
5 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$100,001.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit that the GROSS REVENUE YOU received from COMMERCIAL
26 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
27 2018 to April 22, 2019 exceeded \$500,001.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the GROSS REVENUE YOU received from COMMERCIAL
10 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
11 2018 to April 22, 2019 exceeded \$1,500,001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

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

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that the GROSS REVENUE YOU received from COMMERCIAL
4 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5 2018 to April 22, 2019 exceeded \$5,000,001.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$10,000,000.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

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

25 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
26 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
27 period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 20:**

9 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
10 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

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

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 23:**

13 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
14 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
15 October 2, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 24:**

24 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
25 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
4 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 28:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
15 22, 2019 was more than \$1,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 29:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
26 22, 2019 was more than \$2,500,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 30:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
9 22, 2019 was more than \$5,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 31:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
19 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
20 22, 2019 was more than \$10,000,000.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
3 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
4 22, 2019 was more than \$20,000,000.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
15 was more than \$30,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 34:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
26 was more than \$50,000,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 35:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
9 was more than \$70,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17
18 DATED: November 1, 2021

Respectfully submitted,

19 BROWNE GEORGE ROSS
20 O'BRIEN ANNAGUEY & ELLIS LLP
21 Ivy A. Wang
22 David J. Carroll

23 By: /s/ David J. Carroll

24 David J. Carroll

25 Attorneys for Defendants Vertical Bliss, Inc., Kushy
26 Punch, Inc., Conglomerate Marketing LLC, More
27 Agency, Inc., Arutyun Barsamyan, and Mike A.
28 Toroyan

Exhibit 8

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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,
inclusive,**

24 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT MORE AGENCY, INC.,
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: MORE AGENCY, INC.

3 SET ONE

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

7 **DEFINITIONS**

8 1. "YOU" refers to Responding Party, its agents, employees, and anyone else acting on its
9 behalf.

10 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
11 CA 91304.

12 3. "COMMERCIAL CANNABIS LICENSE" refers to a state license issued pursuant to
13 Division 10 of the Business and Professions Code by the California Department of Public
14 Health's Manufactured Cannabis Safety Branch or the Bureau of Cannabis Control permitting a
15 licensee to engage in COMMERCIAL CANNABIS ACTIVITY at a particular location or
16 premises as identified in Business and Professions Code section 26001, subdivision (y), and
17 encompasses "A-License" and "M-license," as identified in Business and Professions Code
18 section 26001, subdivisions (a) and (ae).

19 4. "COMMERCIAL CANNABIS ACTIVITY" refers to the cultivation, possession,
20 manufacture, distribution, processing, storing, laboratory testing, packaging, labeling,
21 transportation, delivery, or sale of CANNABIS and CANNABIS PRODUCTS, as identified in
22 Business and Professions Code section 26001, subdivision (k).

23 5. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
24 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
25 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
26 derivative, mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,
27 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code
28 section 26001, subdivision (f).

1 6. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
2 whereby the plant material has been transformed into a concentrate, including, but not limited to,
3 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
4 cannabis or other ingredients, as identified in Business and Professions Code section 26001,
5 subdivision (i), Health and Safety Code section 11018.1, and Cal. Code Regs., tit. 17 section
6 40100, subdivision (j).

7 7. "COMMERCIAL MANUFACTURING CANNABIS ACTIVITY" refers to
8 compounding, blending, extracting, infusing, or otherwise making or preparing a CANNABIS
9 PRODUCT; the production, preparation, propagation, or compounding of CANNABIS or
10 CANNABIS PRODUCTS either directly or indirectly or by extraction methods, or independently
11 by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a
12 fixed location that packages or repackages CANNABIS or CANNABIS PRODUCT or labels or
13 relabels its container; to all aspects of the extraction process, infusion process, and packaging and
14 labeling processes, including processing, preparing, holding, and storing of CANNABIS
15 PRODUCTS; and also includes any processing, preparing, holding, or storing of components and
16 ingredients of CANNABIS PRODUCTS, as identified in Business and Professions Code section
17 26001, subdivisions (ag) and (ah), and Cal. Code Regs., tit. 17 section 40100, subdivisions (dd)
18 and (ee).

19 8. "COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY" refers to the procurement,
20 sale, and transport of CANNABIS and CANNABIS PRODUCTS between parties required to
21 hold a COMMERCIAL CANNABIS LICENSE, as identified in Business and Professions Code
22 section 26001, subdivision (r) and Cal. Code Regs., tit. 17 section 40100, subdivision (p).

23 9. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
24 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
25 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
26 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING
27 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS
28 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-

1 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
2 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
3 identified in Cal. Code Regs. tit. 17 section 40152.

4 10. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
5 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
6 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
7 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
8 combination of extraction and chemical synthesis at a fixed location that packages or repackages
9 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
10 extraction process, infusion process, and packaging and labeling processes, including processing,
11 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
12 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
13 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
14 Code Regs., tit. 17 section 40100, subdivisions (dd) and (ee).

15 REQUESTS FOR ADMISSION

16 REQUEST FOR ADMISSION NO. 1:

17 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
18 2019.

19 REQUEST FOR ADMISSION NO. 2:

20 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
21 2019.

22 REQUEST FOR ADMISSION NO. 3:

23 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
24 to October 2, 2019.

25 REQUEST FOR ADMISSION NO. 4:

26 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
27 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period
28 from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 7:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 8:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to October 2, 2019.

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
3 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

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

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
8 2018 to April 22, 2019 exceeded \$100,001.

9 **REQUEST FOR ADMISSION NO. 14:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
12 2018 to April 22, 2019 exceeded \$500,001.

13 **REQUEST FOR ADMISSION NO. 15:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$1,500,001.

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

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
20 22, 2019 exceeded \$3,000,001.

21 **REQUEST FOR ADMISSION NO. 17:**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
24 2018 to April 22, 2019 exceeded \$5,000,001.

25 **REQUEST FOR ADMISSION NO. 18:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
28 2018 to April 22, 2019 exceeded \$10,000,000.

REQUEST FOR ADMISSION NO. 19:

Admit that YOU 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.

REQUEST FOR ADMISSION NO. 20:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 21:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 22:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 23:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to October 2, 2019.

///

1 **REQUEST FOR ADMISSION NO. 26:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **REQUEST FOR ADMISSION NO. 27:**

6 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
7 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
8 2, 2019.

9 **REQUEST FOR ADMISSION NO. 28:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
12 23, 2018 to April 22, 2019 was more than \$1,000,000.

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
16 23, 2018 to April 22, 2019 was more than \$2,500,000.

17 **REQUEST FOR ADMISSION NO. 30:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
20 23, 2018 to April 22, 2019 was more than \$5,000,000.

21 **REQUEST FOR ADMISSION NO. 31**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
24 23, 2018 to April 22, 2019 was more than \$10,000,000.

25 **REQUEST FOR ADMISSION NO. 32:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
28 23, 2018 to April 22, 2019 was more than \$20,000,000.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL
3 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
4 April 22, 2019 was more than \$30,000,000.

5 **REQUEST FOR ADMISSION NO. 34:**

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
8 April 22, 2019 was more than \$50,000,000.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
12 April 22, 2019 was more than \$70,000,000.

13 Dated: June 14, 2021

Respectfully Submitted,

14
15 ROB BONTA
Attorney General of California
16 HARINDER KAPUR
Senior Assistant Attorney General

17 *Patrick Boyne*

18
19 PATRICK BOYNE
Deputy Attorney General
20 *Attorneys for Plaintiffs California*
21 *Department of Public Health and Bureau*
of Cannabis Control

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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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT MORE AGENCY, INC., SET ONE** 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 9

1 BROWNE GEORGE ROSS
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
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24
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26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT MORE AGENCY, INC.'S
RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

Action Filed: September 23, 2020

Trial Date: June 13, 2022

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: MORE AGENCY, INC.

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

25 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
26 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
8 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

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

17 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
18 to October 2, 2019.

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

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

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

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Responding Party objects to this request on the following grounds: (1) it is overbroad,
4 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
5 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
6 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
7 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
8 given the broad scope of the request.

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

10 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
11 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 50 separate days, at some point in the period from April
22 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 100 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 8:**

14 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
15 ACTIVITY at the PREMISES, on at least 200 separate days, at some point in the period from
16 April 23, 2018 to October 2, 2019.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 9:**

25 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
26 ACTIVITY at the PREMISES, on at least 300 separate days, at some point in the period from
27 April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
10 ACTIVITY at the PREMISES, on at least 400 separate days, at some point in the period from
11 April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 11:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 500 separate days, at some point in the period from
22 April 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 527 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$100,001.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit that the GROSS REVENUE YOU received from COMMERCIAL
26 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
27 2018 to April 22, 2019 exceeded \$500,001.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the GROSS REVENUE YOU received from COMMERCIAL
10 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
11 2018 to April 22, 2019 exceeded \$1,500,001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

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

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that the GROSS REVENUE YOU received from COMMERCIAL
4 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5 2018 to April 22, 2019 exceeded \$5,000,001.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$10,000,000.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

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

25 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
26 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
27 period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 20:**

9 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
10 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

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

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 23:**

13 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
14 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
15 October 2, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 24:**

24 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
25 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
4 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 28:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
15 22, 2019 was more than \$1,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 29:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
26 22, 2019 was more than \$2,500,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 30:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
9 22, 2019 was more than \$5,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 31:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
19 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
20 22, 2019 was more than \$10,000,000.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
3 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
4 22, 2019 was more than \$20,000,000.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
15 was more than \$30,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 34:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
26 was more than \$50,000,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 35:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
9 was more than \$70,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17
18 DATED: November 1, 2021

Respectfully submitted,

19 BROWNE GEORGE ROSS
20 O'BRIEN ANNAGUEY & ELLIS LLP
21 Ivy A. Wang
22 David J. Carroll

23 By: /s/ David J. Carroll

24 David J. Carroll

25 Attorneys for Defendants Vertical Bliss, Inc., Kushy
26 Punch, Inc., Conglomerate Marketing LLC, More
27 Agency, Inc., Arutyun Barsamyan, and Mike A.
28 Toroyan

Exhibit 10

1 ROB BONTA
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2 HARINDER KAPUR
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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,
inclusive,**

24 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT ARUTYUN BARSAMYAN,
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: ARUTYUN BARSAMYAN

3 SET : ONE

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

7 **DEFINITIONS**

8 1. "YOU" refers to Responding Party.

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

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

1 Code section 26051.5 subdivision (a)(5)(C).

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

11 REQUESTS FOR ADMISSION

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

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

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

16 Admit that YOU were the Secretary of Kushy Punch, Inc. in the period from April 23,
17 2018 to October 2, 2019.

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

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

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

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

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

25 Admit that YOU were an OWNER of Vertical Bliss, Inc. in the period from April 23,
26 2018 to October 2, 2019.

27 **REQUEST FOR ADMISSION NO. 6:**

28 Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23,

1 2018 to October 2, 2019.

2 **REQUEST FOR ADMISSION NO. 7:**

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

5 **REQUEST FOR ADMISSION NO. 8:**

6 Admit that YOU were an OWNER of Kushy Punch, Inc. in the period from April 23,
7 2018 to October 2, 2019.

8 **REQUEST FOR ADMISSION NO. 9:**

9 Admit that YOU were a SUPERVISOR of Kushy Punch, Inc. in the period from April 23,
10 2018 to October 2, 2019.

11 **REQUEST FOR ADMISSION NO. 10:**

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

14 **REQUEST FOR ADMISSION NO. 11:**

15 Admit that YOU were an OWNER of More Agency, Inc. in the period from April 23,
16 2018 to October 2, 2019.

17 **REQUEST FOR ADMISSION NO. 12:**

18 Admit that YOU were a SUPERVISOR of More Agency, Inc. in the period from April 23,
19 2018 to October 2, 2019.

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

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

23 **REQUEST FOR ADMISSION NO. 14:**

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

26 **REQUEST FOR ADMISSION NO. 15:**

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

REQUEST FOR ADMISSION NO. 16:

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

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RFA Barsamyan.docx

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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT ARUTYUN BARSAMYAN, SET ONE** 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 11

1 BROWNE GEORGE ROSS
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2 Ivy A. Wang (State Bar No. 224899)
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
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24
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26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT ARUTYUN
BARSAMYAN'S RESPONSES TO
PLAINTIFF'S REQUESTS FOR
ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

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

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: ARUTYUN BARSAMYAN

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

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

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
5 seek documents and evidence protected from disclosure by other privileges or doctrines that are
6 not readily apparent given the broad scope of the request.

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

8 Admit that YOU were the Secretary of Kushy Punch, Inc. in the period from April 23,
9 2018 to October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
16 seek documents and evidence protected from disclosure by other privileges or doctrines that are
17 not readily apparent given the broad scope of the request.

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

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
27 seek documents and evidence protected from disclosure by other privileges or doctrines that are
28 not readily apparent given the broad scope of the request.

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

2 Admit that YOU were the Sole Director of Kushy Punch, Inc. in the period from April 23,
3 2018 to October 2, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
10 seek documents and evidence protected from disclosure by other privileges or doctrines that are
11 not readily apparent given the broad scope of the request.

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

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

16 Responding Party objects to this request on the following grounds: (1) it is overbroad,
17 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
18 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
19 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
20 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
21 seek documents and evidence protected from disclosure by other privileges or doctrines that are
22 not readily apparent given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 6:**

24 Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23,
25 2018 to October 2, 2019.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
4 seek documents and evidence protected from disclosure by other privileges or doctrines that are
5 not readily apparent given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 7:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
15 seek documents and evidence protected from disclosure by other privileges or doctrines that are
16 not readily apparent given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 8:**

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

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

21 Responding Party objects to this request on the following grounds: (1) it is overbroad,
22 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
23 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
24 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
25 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
26 seek documents and evidence protected from disclosure by other privileges or doctrines that are
27 not readily apparent given the broad scope of the request.

1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit that YOU were a SUPERVISOR of Kushy Punch, Inc. in the period from April 23,
3 2018 to October 2, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
10 seek documents and evidence protected from disclosure by other privileges or doctrines that are
11 not readily apparent given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 10:**

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

16 Responding Party objects to this request on the following grounds: (1) it is overbroad,
17 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
18 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
19 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
20 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
21 seek documents and evidence protected from disclosure by other privileges or doctrines that are
22 not readily apparent given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 11:**

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

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
4 seek documents and evidence protected from disclosure by other privileges or doctrines that are
5 not readily apparent given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 12:**

7 Admit that YOU were a SUPERVISOR of More Agency, Inc. in the period from April 23,
8 2018 to October 2, 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
15 seek documents and evidence protected from disclosure by other privileges or doctrines that are
16 not readily apparent given the broad scope of the request.

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

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

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

21 Responding Party objects to this request on the following grounds: (1) it is overbroad,
22 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
23 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
24 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
25 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
26 seek documents and evidence protected from disclosure by other privileges or doctrines that are
27 not readily apparent given the broad scope of the request.

1 **REQUEST FOR ADMISSION NO. 14:**

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
10 seek documents and evidence protected from disclosure by other privileges or doctrines that are
11 not readily apparent given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 15:**

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

16 Responding Party objects to this request on the following grounds: (1) it is overbroad,
17 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
18 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
19 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
20 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
21 seek documents and evidence protected from disclosure by other privileges or doctrines that are
22 not readily apparent given the broad scope of the request.

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

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

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
4 seek documents and evidence protected from disclosure by other privileges or doctrines that are
5 not readily apparent given the broad scope of the request.

6
7 DATED: November 1, 2021

Respectfully submitted,

8 BROWNE GEORGE ROSS
9 O'BRIEN ANNAGUEY & ELLIS LLP
10 Ivy A. Wang
David J. Carroll

11
12 By: /s/ David J. Carroll

13 David J. Carroll

14 Attorneys for Defendants Vertical Bliss, Inc., Kushy
15 Punch, Inc., Conglomerate Marketing LLC, More
Agency, Inc., Arutyun Barsamyan, and Mike A.
Toroyan

Exhibit 12

1 ROB BONTA
Attorney General of California
2 HARINDER KAPUR
Senior Assistant Attorney General
3 ETHAN A. TURNER
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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,
inclusive,**

24 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT MIKE A. TOROYAN, 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: MIKE A. TOROYAN

3 SET ONE

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

7 **DEFINITIONS**

8 1. "YOU" refers to Responding Party.

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

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

1 Code section 26051.5 subdivision (a)(5)(C).

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

11 **REQUESTS FOR ADMISSION**

12
13 **REQUEST FOR ADMISSION NO. 1:**

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

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

17 Admit that YOU were an OWNER of Vertical Bliss, Inc. in the period from April 23,
18 2018 to October 2, 2019.

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

20 Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23,
21 2018 to October 2, 2019.

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

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

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

26 Admit that YOU were an OWNER of Kushy Punch, Inc. in the period from April 23,
27 2018 to October 2, 2019.

28 ///

REQUEST FOR ADMISSION NO. 6:

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. 7:

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. 8:

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. 9:

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. 10:

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. 11:

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

REQUEST FOR ADMISSION NO. 12:

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

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

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

4
5 Dated: June 14, 2021

6 Respectfully Submitted,

7 ROB BONTA
8 Attorney General of California
9 HARINDER KAPUR
10 Senior Assistant Attorney General

11 *Patrick Boyne*

12 PATRICK BOYNE
13 Deputy Attorney General
14 *Attorneys for Plaintiffs California*
15 *Department of Public Health and Bureau*
16 *of Cannabis Control*

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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 **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT MIKE A. TOROYAN, SET ONE** 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 13

1 BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
2 Ivy A. Wang (State Bar No. 224899)
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3 David J. Carroll (State Bar No. 291665)
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Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
23
24
25
26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT MIKE A. TOROYAN'S
RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

Action Filed: September 23, 2020

Trial Date: June 13, 2022

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: MIKE A. TOROYAN

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

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

25 Admit that YOU were the General Manager of Vertical Bliss, Inc. in the period from April
26 23, 2018 to October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
5 seek documents and evidence protected from disclosure by other privileges or doctrines that are
6 not readily apparent given the broad scope of the request.

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

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
16 seek documents and evidence protected from disclosure by other privileges or doctrines that are
17 not readily apparent given the broad scope of the request.

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

19 Admit that YOU were a SUPERVISOR of Vertical Bliss, Inc. in the period from April 23,
20 2018 to October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
27 seek documents and evidence protected from disclosure by other privileges or doctrines that are
28 not readily apparent given the broad scope of the request.

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
10 seek documents and evidence protected from disclosure by other privileges or doctrines that are
11 not readily apparent given the broad scope of the request.

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

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

16 Responding Party objects to this request on the following grounds: (1) it is overbroad,
17 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
18 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
19 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
20 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
21 seek documents and evidence protected from disclosure by other privileges or doctrines that are
22 not readily apparent given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 6:**

24 Admit that YOU were a SUPERVISOR of Kushy Punch, Inc. in the period from April 23,
25 2018 to October 2, 2019.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
4 seek documents and evidence protected from disclosure by other privileges or doctrines that are
5 not readily apparent given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 7:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
15 seek documents and evidence protected from disclosure by other privileges or doctrines that are
16 not readily apparent given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 8:**

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

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

21 Responding Party objects to this request on the following grounds: (1) it is overbroad,
22 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
23 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
24 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
25 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
26 seek documents and evidence protected from disclosure by other privileges or doctrines that are
27 not readily apparent given the broad scope of the request.

1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit that YOU were a SUPERVISOR of More Agency, Inc. in the period from April 23,
3 2018 to October 2, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
10 seek documents and evidence protected from disclosure by other privileges or doctrines that are
11 not readily apparent given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 10:**

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

16 Responding Party objects to this request on the following grounds: (1) it is overbroad,
17 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
18 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
19 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
20 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
21 seek documents and evidence protected from disclosure by other privileges or doctrines that are
22 not readily apparent given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 11:**

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

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
4 seek documents and evidence protected from disclosure by other privileges or doctrines that are
5 not readily apparent given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 12:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
15 seek documents and evidence protected from disclosure by other privileges or doctrines that are
16 not readily apparent given the broad scope of the request.

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

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

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

21 Responding Party objects to this request on the following grounds: (1) it is overbroad,
22 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
23 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
24 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
25 evidence protected from disclosure by Responding Party's Fifth-Amendment privilege; (5) it may
26 seek documents and evidence protected from disclosure by other privileges or doctrines that are
27 not readily apparent given the broad scope of the request.

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DATED: November 1, 2021

Respectfully submitted,

BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
Ivy A. Wang
David J. Carroll

By: /s/ David J. Carroll
David J. Carroll
Attorneys for Defendants Vertical Bliss, Inc., Kushy
Punch, Inc., Conglomerate Marketing LLC, More
Agency, Inc., Arutyun Barsamyan, and Mike A.
Toroyan

Exhibit 14

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

March 16, 2022

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.

8:30 AM

vs VERTICAL BLISS, INC., et al.

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): ETHAN A. TURNER (Telephonic) by Michael Yun

For Defendant(s): Margarita Salazar (Telephonic)

NATURE OF PROCEEDINGS: Hearing on Motion to Compel Further Discovery Responses

The matter is called for hearing.

The Court reads and considers the moving papers in support of Hearing on Motion to Compel Further Discovery Responses.

After oral argument, the Court takes the matter under submission.

LATER:

The Court adopts its tentative ruling as its final ruling as follows:

COMPEL

MOVING PARTY: Plaintiff, California Department of Public Health and Bureau of Cannabis Control

RESPONDING PARTY: Unopposed/Defendant, Vertical Bliss

RULING: Granted

Plaintiff California Department of Public Health and Bureau of Cannabis Control moves to compel further responses to Form Interrogatories (set one), Request for Production of Documents (set one), and Request for Admissions (set one) from Defendant Vertical Bliss. Plaintiff served Defendant on June 14, 2021. [Declaration of Ethan Turner, ¶ 2, Exhibits 1-3.] Following a number of extensions, responses consisting of objections were served on November 1, 2021. [Id., Ex. 9-11.] The subject motion comes after numerous extensions for supplemental responses.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

March 16, 2022

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.

8:30 AM

vs VERTICAL BLISS, INC., et al.

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

All discovery contain the same objections: overbroad and burdensome, attorney client and work product privilege, and a reservation of unstated objections.

The burdensome objections lack merit. Objecting parties must file evidence detailing the amount of work involved, in order to support objections based upon burden and oppression. (West Pico Furniture Co. v. Sup. Ct. (1961) 56 Cal.2d 407, 417.) “[S]ome burden is inherent in all demands for discovery. The objection of burden is valid only when that burden is demonstrated to result in injustice.” (Id. at p. 418.) The overbroad objection also lacks merit. (Obregon v. Superior Court (1998) 67 Cal.App.4th 424, 431.)

The attorney-client privilege attaches to a confidential communication between the attorney and the client and bars discovery of the communication irrespective of whether it includes unprivileged material.” (Costco Wholesale Corp. v. Superior Court (2009) 47 Cal.4th 725, 734.) The transmission of information between third parties and counsel also maintain attorney client privilege protection, if the communication is in further interest of the client. (Evid. Code, § 952.) “Once that party establishes facts necessary to support a prima facie claim of privilege, the communication is presumed to have been made in confidence and the opponent of the claim of privilege has the burden of proof to establish the communication was not confidential or that the privilege does not for other reasons apply.” (Costco Wholesale Corp. v. Superior Court, supra, 47 Cal.4th at p. 733.)

The work product privilege applies where the sought after documents contains Defendant’s “impressions, conclusions, opinions or legal research or theories,” the information is protected by the work product doctrine. (Code Civ. Proc., § 2018.030(c).) “An objecting party may be entitled to protection if it can make a preliminary or foundational showing that answering the interrogatory would reveal the attorney's tactics, impressions, or evaluation of the case, or would result in opposing counsel taking undue advantage of the attorney's industry or efforts”].) (Coito v. Superior Court (2012) 54 Cal.4th 480, 502.) Notes, statements, and impressions of the case are protected by the work product doctrine. A list of potential witnesses is not work product. (Coito v. Superior Court (2012) 54 Cal.4th 480, 495; Nacht & Lewis Architects, Inc. v. Superior Court (1996) 47 Cal.App.4th 214, 217–218.)

The burden of establishing that a particular matter is privileged is on the party asserting the privilege.” (American Airlines, Inc. v. Superior Court (2003) 114 Cal.App.4th 881, 887.) The responses provide no support for the privilege objections.

The privilege objections and lack of opposition to the motion supports a finding of meritless

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

March 16, 2022

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.

8:30 AM

vs VERTICAL BLISS, INC., et al.

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

objections, even if Defendant preserved their right to object with timely responses. Regardless, if Defendant is actually withholding any documents on the basis of privilege, Defendant is ordered to produce a privilege log. (Code Civ. Proc., § 2031.240, subd. (c).) Defendant are additionally ordered to produce further responses in compliance with Code of Civil Procedure sections 2030.220, (subd. a-b), 2031.220-230, and 2033.220 within 20 days of this order.

Sanctions in the amount of \$250 joint and severally imposed against both counsel and defendant Vertical Bliss, and payable within 30 days of this order. (Code Civ. Proc., §§ 2030.300, subd. (d), 2031.310, subd. (h), and 2033.290, subd. (d).)

Trial date of 01-30-2023 remains set.

The Court notes that the following future hearings are all to be heard on 05/26/2022, with the oppositions and replies to be filed as the original hearing dates set:

Hearing on Motion to Compel Further Discovery Responses scheduled for 05/19/2022,
Hearing on Motion to Compel Further Discovery Responses scheduled for 05/23/2022,
Hearing on Motion to Compel Further Discovery Responses scheduled for 05/24/2022,
Hearing on Motion to Compel Further Discovery Responses scheduled for 05/25/2022,

Clerk is to give notice.

Certificate of Mailing is attached.

<p align="center">SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</p>		<p align="center">Reserved for Clerk's File Stamp</p>
<p>COURTHOUSE ADDRESS: Chatsworth Courthouse 9425 Penfield Avenue, Chatsworth, CA 91311</p>		<p align="center">FILED Superior Court of California County of Los Angeles 03/16/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>A. Chebishyan</u> Deputy</p>
<p>PLAINTIFF/PETITIONER: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH et al</p>		
<p>DEFENDANT/RESPONDENT: VERTICAL BLISS, INC. et al</p>		
<p align="center">CERTIFICATE OF MAILING</p>		<p>CASE NUMBER: 20CHCV00560</p>

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Minute Order (Hearing on Motion to Compel Further Discovery Responses) of 03/16/2022 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Chatsworth, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

California Department of Cannabis Control

California Department of Cannabis Control (Plaintiff - Substituted/Consolidated)

Margarita Salazar
Law Offices of Margarita Salazar, APLC
470 Third Avenue
Chula Vista, CA 91910

Ian Andrew Stewart
Wilson Elser
555 S Flower St Ste 2900
Los Angeles, CA 90071

ETHAN A. TURNER
Deputy Attorney General
1300 I Street, Suite 125
SACRAMENTO, CA 94244

Ivy A Wang
BROWNE GEORGE ROSS O'BRIEN ANNAGUEY
& ELLIS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

Sherri R. Carter, Executive Officer / Clerk of Court

Dated: 03/17/2022

By: A. Chebishyan
Deputy Clerk

CERTIFICATE OF MAILING

Exhibit 15

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

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

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): ETHAN A. TURNER (Telephonic) by Michael Yun

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Discovery (not "Further Discovery") to Request for Production, Set One - Ruben Kachian; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses

The matters are called for hearing.

The Court reads and considers the moving papers in support of the motion.

After Court and Counsel confer, and Court takes the matters under submission:

LATER:

The Court rules as follows:

COMPEL

MOVING PARTY: Plaintiff, California Department of Public Health and Bureau of Cannabis Control

RESPONDING PARTY: Unopposed/Defendants, Kushy Punch, Inc., et al.

RELIEF REQUESTED

Motion to Compel Further Responses to Form Interrogatories (set one), Request for Production of Documents (set one), and Request for Admissions (set one)

RULING: Granted

Plaintiff California Department of Public Health and Bureau of Cannabis Control brings a series

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

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

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

of motions to compel further responses to Form Interrogatories (set one), Request for Production of Documents, and Request for Admissions (set one) from Defendants Kushy Punch, Inc., Vertical Bliss, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Artyun Barsamyan, and Mike Toroyan.

Plaintiff served Defendants on June 14, 2021. [Declaration of Ethan Turner, ¶ 2, Exhibits 1-3.] Following a number of extensions, responses consisting of objections were served on November 1, 2021. [Id., Ex. 9-11.] The subject motion comes after numerous extensions for supplemental responses. All discovery responses contain the same objections: overbroad and burdensome, attorney client and work product privilege, and a reservation of unstated objections.

The burdensome objections lack merit. Objecting parties must file evidence detailing the amount of work involved, in order to support objections based upon burden and oppression. (West Pico Furniture Co. v. Sup. Ct. (1961) 56 Cal.2d 407, 417.) “[S]ome burden is inherent in all demands for discovery. The objection of burden is valid only when that burden is demonstrated to result in injustice.” (Id. at p. 418.) The overbroad objection also lacks merit. (Obregon v. Superior Court (1998) 67 Cal.App.4th 424, 431.)

The attorney-client privilege attaches to a confidential communication between the attorney and the client and bars discovery of the communication irrespective of whether it includes unprivileged material.” (Costco Wholesale Corp. v. Superior Court (2009) 47 Cal.4th 725, 734.) The transmission of information between third parties and counsel also maintain attorney client privilege protection, if the communication is in further interest of the client. (Evid. Code, § 952.) “Once that party establishes facts necessary to support a prima facie claim of privilege, the communication is presumed to have been made in confidence and the opponent of the claim of privilege has the burden of proof to establish the communication was not confidential or that the privilege does not for other reasons apply.” (Costco Wholesale Corp. v. Superior Court, supra, 47 Cal.4th at p. 733.)

The work product privilege applies where the sought after documents contains Defendant’s “impressions, conclusions, opinions or legal research or theories,” the information is protected by the work product doctrine. (Code Civ. Proc., § 2018.030(c).) “An objecting party may be entitled to protection if it can make a preliminary or foundational showing that answering the interrogatory would reveal the attorney’s tactics, impressions, or evaluation of the case, or would result in opposing counsel taking undue advantage of the attorney’s industry or efforts”].) (Coito v. Superior Court (2012) 54 Cal.4th 480, 502.) Notes, statements, and impressions of the case are protected by the work product doctrine. A list of potential witnesses is not work product. (Coito

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

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

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

v. Superior Court (2012) 54 Cal.4th 480, 495; Nacht & Lewis Architects, Inc. v. Superior Court (1996) 47 Cal.App.4th 214, 217–218.)

The burden of establishing that a particular matter is privileged is on the party asserting the privilege.” (American Airlines, Inc. v. Superior Court (2003) 114 Cal.App.4th 881, 887.) The responses provide no support for the privilege objections. Regardless, if Defendants are actually withholding any documents on the basis of privilege, Defendants are ordered to produce a privilege log. (Code Civ. Proc., § 2031.240, subd. (c).) Defendants are additionally ordered to produce further responses in compliance with Code of Civil Procedure sections 2030.220, (subd. a-b), 2031.220-230, and 2033.220 within 20 days of this order.

The objections and lack of opposition to the motion otherwise supports a finding of meritless objections to the challenged items. Defendants are additionally ordered to produce further responses in compliance with Code of Civil Procedure sections 2030.220, (subd. a-b), 2031.220-230, and 2033.220 within 20 days of this order.

Sanctions in the amount of \$250 per defendant joint and severally imposed against each individual defendants Kushy Punch, Inc, Vertical Bliss, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Artyun Barsamyan, and Mike Toroyan, and their respective attorneys of record. Payable within 30 days of this order. (Code Civ. Proc., §§ 2030.300, subd. (d), 2031.310, subd. (h), and 2033.290, subd. (d).) Total sanctions of \$1,500—six defendants @\$250/motion.

Motions to compel set for June 7 and 10, 2022.

COMPEL

MOVING PARTY: Plaintiff, California Department of Public Health and Bureau of Cannabis Control

RESPONDING PARTY: Unopposed/Defendant, Ruben Kachian aka Ruben Cross

RELIEF REQUESTED

Motion to Compel Responses to Request for Production of Documents (set one)

RULING: Off-Calendar

The motion was filed and served on May 5, 2022, which is exactly 15 court days from the date of the hearing. (Code Civ. Proc., §§ 12, 12a, 12b, 12c, 1005, subd. (b).) The motion is therefore

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

North Valley District, Chatsworth Courthouse, Department F49

20CHCV00560

May 26, 2022

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.

8:30 AM

vs VERTICAL BLISS, INC., et al.

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

untimely.

Motion to compel set for June 7, 2022.

Clerk is to give notice.

Certificate of Mailing is attached.

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 DEPUTY ATTORNEY GENERAL MICHAEL YUN 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:

Party	Address
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 E-mail Address: 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 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

Declarant



Signature