



**Department of
Cannabis Control**
CALIFORNIA

Gavin Newsom
Governor

Nicole Elliott
Director

December 23, 2025

VIA EMAIL AND CERTIFIED MAIL

A & J Management Services LLC
dba E.G. Organics
7700 Edgewater Drive, Ste. 202
Oakland, CA 94621
elevatedgroupabdul@gmail.com

Abdul Qayum, Owner
A & J Management Services LLC
6150 Joaquin Murieta Ave., Apt. D
Newark, CA 94560
elevatedgroupabdul@gmail.cpm

Jacob Bonales, Owner
A & J Management Services LLC
2420 106th Ave.
Oakland, CA 94603
elevatedgroupjacob@gmail.com

Re: A & J Management Services LLC DBA E.G. Organics
Case No. DCC24-0002659-INV
Default Decision and Order

Dear Messrs. Qayum and Bonales:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent A & J Management Services LLC dba E.G. Organics, in default and therefore will proceed as described in the attached Default Decision and Order.

Be advised that Government Code section 11520, subdivision (c), provides that Respondent may serve a written motion requesting that the Decision be vacated upon stating the ground relied on within seven (7) days after service of the Decision. Respondent may address any written motion to the Department via email at DCCDecisions@cannabis.ca.gov, or by post or courier to:

Department of Cannabis Control
Office of the General Counsel
2920 Kilgore Road
Rancho Cordova, CA 95670

The Department in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

Barring such a timely motion, the attached Default Decision and Order involving A & J Management Services LLC, will become effective on January 22, 2026.

Sincerely,

Douglas Smurr
Assistant General Counsel

Enclosure

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8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM,**
14 **OWNER**
15 **7700 Edgewater Drive, Suite 202**
16 **Oakland, CA 94621**

17 **Cannabis Retailer - Non-Storefront License**
18 **No. C9-0000273-LIC**

19 Respondent.

Case No. DCC24-0002659-INV

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

20 **FINDINGS OF FACT**

21 1. On or about November 5, 2025, Complainant Evelyn Schaeffer, in her official
22 capacity as the Deputy Director of the Compliance Division of the Department of Cannabis
23 Control, filed Accusation No. DCC24-0002659-INV against A & J Management Services LLC
24 dba E.G. Organics (Respondent) with Abdul Qayum as Owner (Owner) before the Department of
25 Cannabis Control. (Accusation is attached as Exhibit A.)

26 2. On or about August 29, 2019, the Department of Cannabis Control (Department)
27 issued Cannabis Retailer - Non-Storefront License No. C9-0000273-LIC to Respondent. The
28 Cannabis Retailer - Non-Storefront License was in full force and effect at all times relevant to the
charges brought in Accusation No. DCC24-0002659-INV and expired on August 28, 2025. This
lapse in licensure, however, pursuant to Business and Professions Code section 26031,

subdivision (d), does not deprive the Department of its authority to institute or continue this disciplinary proceeding.

3. On or about November 6, 2025, Respondent was served by Certified and First Class Mail copies of the Accusation No. DCC24-0002659-INV, Statement to Respondent, Notice of Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of Regulations, title 4, section 15002, is required to be reported and maintained with the Department. Respondent's address of record was and is: 7700 Edgewater Drive, Suite 202, Oakland, CA 94621.

4. Service of the Accusation was effective as a matter of law under the provisions of Government Code section 11505(c) and/or Business and Professions Code section 124.

5. Government Code section 11506(c) states, in pertinent part:

(c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense . . . and the notice shall be deemed a specific denial of all parts of the accusation . . . not expressly admitted. Failure to file a notice of defense . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing.

6. The Department takes official notice of its records and the fact that Respondent failed to file a Notice of Defense within 15 days after service upon them of the Accusation, and therefore waived its right to a hearing on the merits of Accusation No. DCC24-0002659-INV.

7. California Government Code section 11520(a) states, in pertinent part:

(a) If the respondent either fails to file a notice of defense . . . or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent

8. Pursuant to its authority under Government Code section 11520, the Department finds Respondent is in default. The Department will take action without further hearing and, based on the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter, finds that the charges and allegations in Accusation No. DCC24-0002659-INV, are separately and severally, found to be true and correct by clear and convincing evidence.

9. The Department finds that the actual costs for Investigation and Enforcement are \$10,034.50 as of December 16, 2025.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent A & J Management Services LLC dba E.G. Organics; Abdul Qayum, Owner has subjected its Cannabis Retailer - Non-Storefront License No. C9-0000273-LIC to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Department of Cannabis Control is authorized to revoke Respondent's Cannabis Retailer - Non-Storefront License based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

- a. Violation of Business and Professions Code sections 26030, subdivisions (a) and (d), and 26051.5, subdivision (a)(6), and Title 4 of the California Code of Regulations, section 15002, subdivision (c)(20). [Valid Seller's Permit]
- b. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15000.1, subdivision (b). [Cannabis Activity with Unlicensed Individuals]
- c. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d) and 17800, subdivision (a). [Access to Licensed Premises]
- d. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15023, subdivision (c). [Business Modifications]
- e. Violation of Business and Professions Code sections 26030, subdivisions (a) and (d), and 26160, and Title 4 of the California Code of Regulations, sections 15037, subdivision (a) and 15044, subdivision (i). [Video Surveillance]

- 1 f. Violation of Business and Professions Code section 26030, subdivisions (a) and
2 (c), and California Code of Regulations, title 4, section 17801, subdivisions (a)
3 and (e). [Notice to Comply]
4 g. Violation of Business and Professions Code section 26030, subdivisions (a) and
5 (c), and California Code of Regulations, title 4, section 15000.7, subdivision
6 (a). [Storage of Inventory]
7

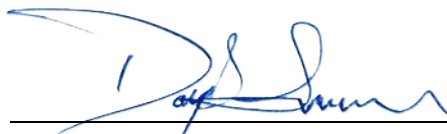
8 **ORDER**

9 IT IS SO ORDERED that Cannabis Retailer - Non-Storefront License No. C9-0000273-
10 LIC, issued to Respondent A & J Management Services LLC dba E.G. Organics, is revoked.

11 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a
12 written motion requesting that the Decision be vacated and stating the grounds relied on within
13 seven (7) days after service of the Decision on Respondent. The agency in its discretion may
14 vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

15 This Decision shall become effective on January 22, 2026.

16 IT IS SO ORDERED, December 23, 2025.

17 
18

19 _____
20 Douglas Smurr
Assistant General Counsel
FOR THE DEPARTMENT OF CANNABIS CONTROL

21 Default Decision and Order - LIC.docx
22 DOJ Matter ID:SA2025801749

23 Attachment:
24 Exhibit A: Accusation
25
26
27
28

Exhibit A

Accusation No. DCC25-0000542-INV

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7

8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM**
14 **AND JACOB BONALES, OWNERS**
7700 Edgewater Drive, Suite 202
Oakland, CA 94621

ACCUSATION

15 **Cannabis - Retailer Non-Storefront License**
16 **No. C9-0000273-LIC**

Respondent.

17
18 **PARTIES**

19 1. Evelyn Schaeffer (Complainant) brings this Accusation solely in her official capacity
20 as the Deputy Director of the Compliance Division of the Department of Cannabis Control
21 (Department).

22 2. The Department issued Cannabis - Retailer Non-Storefront License
23 No. C9-0000273-LIC to A & J Management Services LLC dba E.G. Organics (Respondent) with
24 Abdul Qayum (Owner Qayum) and Jacob Bonales as Owners (collectively Owners). The
25 Cannabis – Retailer Non-Storefront License was in full force and effect at all times relevant to the
26 charges brought herein and expired on August 28, 2025.

27 ///

28 ///

JURISDICTION

3. This Accusation is brought before the Director of the Department (Director), under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 26010 of the Code states:

There is in the Business, Consumer Services, and Housing Agency, the Department of Cannabis Control under the supervision and control of a director. The director shall administer and enforce the provisions of this division related to the department.

5. Section 26010.5, subdivision (d), of the Code states:

The department has the power, duty, purpose, responsibility, and jurisdiction to regulate commercial cannabis activity as provided in this division.

6. Section 26012, subdivision (a), of the Code states:

It being a matter of statewide concern, except as otherwise authorized in this division, the department shall have the sole authority to create, issue, deny, renew, discipline, condition, suspend, or revoke licenses for commercial cannabis activity.

7. Section 26013, subdivision (a), of the Code states:

The department shall make and prescribe reasonable rules and regulations as may be necessary to implement, administer, and enforce its duties under this division in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code. Those rules and regulations shall be consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of Marijuana Act.

8. Section 26031 of the Code states:

(a) The department may suspend, revoke, place on probation with terms and conditions, or otherwise discipline licenses issued by the department and fine a licensee, after proper notice and hearing to the licensee, except as provided in Section 26031.01, if the licensee is found to have committed any of the acts or omissions constituting grounds for disciplinary action. The disciplinary proceedings under this chapter shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director shall have all the powers granted therein.

(b) The department may suspend or revoke a license when a local agency has notified the department that a licensee within its jurisdiction is in violation of state rules and regulations relating to commercial cannabis activities, and the department, through an investigation, has determined that the violation is grounds for suspension or revocation of the license.

1 (c) The department may take disciplinary action against a licensee for any
2 violation of this division when the violation was committed by the licensee's officers,
3 directors, owners, agents, or employees while acting on behalf of the licensee or
engaged in commercial cannabis activity.

4 (d) The suspension or expiration of a license issued by the department, or its
5 suspension, forfeiture, or cancellation by order of the department or by order of a
6 court of law, or its surrender without the written consent of the department, shall not,
7 during any period in which it may be renewed, restored, reissued, or reinstated,
deprive the department of its authority to institute or continue a disciplinary
proceeding against the licensee upon any ground provided by law or to enter an order
suspending or revoking the license or otherwise taking disciplinary action against the
licensee on any such ground.

8 9. Section 26034 of the Code states:

9 All accusations against licensees shall be filed by the department within five
10 years after the performance of the act or omission alleged as the ground for
11 disciplinary action; provided, however, that the foregoing provision shall not
12 constitute a defense to an accusation alleging fraud or misrepresentation as a ground
13 for disciplinary action. The cause for disciplinary action in that case shall not be
deemed to have accrued until discovery, by the department, of the facts constituting
the fraud or misrepresentation, and, in that case, the accusation shall be filed within
five years after that discovery.

14 **STATUTORY PROVISIONS**

15 10. Section 26030 of the Code states:

16 Grounds for disciplinary action include, but are not limited to, all of the
17 following:

18 (a) Failure to comply with the provisions of this division or any rule or
regulation adopted pursuant to this division.

19 . . .

20 (c) Any other grounds contained in regulations adopted by the department
21 pursuant to this division.

22 (d) Failure to comply with any state law including, but not limited to, the
23 payment of taxes as required under the Revenue and Taxation Code, except as
provided for in this division or other California law.

24 . . .

25 11. Section 26051.5 of the Code states:

26 (a) An applicant for a state license pursuant to this division to conduct
27 commercial cannabis activity, as defined in Section 26001, shall do all of
the following:

28 . . .

1 (6) Provide the applicant's valid seller's permit number issued pursuant to Part
2 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation Code
or indicate that the applicant is currently applying for a seller's permit.

3 ...

4 12. Section 26160 of the Code states:

5 (a) A licensee shall keep accurate records of commercial cannabis activity.

6 (b) All records related to commercial cannabis activity as defined by the
7 department shall be maintained for a minimum of seven years.

8 (c) The department may examine the records of a licensee and inspect the
premises of as the department, or a state or local agency, deems necessary to perform
9 its duties under this division. All inspections and examinations of records shall be
conducted during standard business hours of the licensed facility or at any other
10 reasonable time. Licensees shall provide and deliver records to the department upon
request.

11 (d) Licensees shall keep records identified by the department on the premises
of the location licensed. The department may make any examination of the records or
12 any licensee. Licensees shall also provide and deliver copies of documents to the
department upon request.

13 (e) A licensee, or its agent or employee, that refuses, impedes, obstructs, or
14 interferes with an inspection of the premises or records of the licensee pursuant to this
section, has engaged in a violation of this division.

15 ...

16 **REGULATORY PROVISIONS**

17
18 13. Title 4 of the California Code of Regulations (CCR), section 15000.1 states:

19 (a) Every person who conducts commercial cannabis activity shall obtain and
20 maintain a valid license from the Department for each separate premises at which
commercial cannabis activity is conducted.

21 ...

22 14. Title 4 of the CCR, section 15000.3, states in pertinent part:

23 ...

24 (d) Licensees shall ensure that the Department has immediate access to their licensed
premises. If the Department is denied access to a licensee's premises for any reason, the
25 licensee shall be held responsible and subject to discipline. If the Department is denied
access to one licensee's premises because of another licensee's refusal to grant access
26 when the only access to one licensed premises is through another licensed premises, all
licensees shall be held responsible and subject to discipline.

27 ...

1 15. Title 4 of the CCR, section 15000.7, states in pertinent part:

2 (a) All cannabis and cannabis products must be stored within the licensed premises.

3 ...

4 16. Title 4 of the CCR, section 15002, states in part:

5 ...

6 (c) An application must be completed by an owner as defined by section 15003.
7 An application for an annual cannabis license includes the following:

8

9 (20) The applicant shall provide a valid seller's permit number issued by the
10 California Department of Tax and Fee Administration, if applicable. If the
11 commercial cannabis business has not yet received a seller's permit, the commercial
12 cannabis business shall attest that the commercial cannabis business is currently
13 applying for a seller's permit....

14 17. Title 4 of the CCR, section 15023 states:

15 Business modifications shall be made in accordance with the following:

16 ...

17 (c) Licenses are not transferrable or assignable to another person or owner. In the
18 event of the sale or other transfer of the business operations covered by the licensee,
19 changes in ownership shall be made in accordance with the following:

20 (1) If one or more of the owners change, the new owners shall submit the
21 information required under section 15002(c)(16) for each new owner to the Department
22 within 14 calendar days of the effective date of the ownership change. The business may
23 continue to operate under the active license while the Department reviews the
24 qualifications of the new owner(s) in accordance with the Act and these regulations to
25 determine whether the change would constitute grounds for denial of the license, if at least
26 one existing owner is not transferring their ownership interest and will remain as an owner
27 under the new ownership structure. If all owners will be transferring their ownership
28 interest, the business shall not operate under the new ownership structure until a new
license application has been submitted to and approved by the Department, and all
application and license fees for the new application have been paid. The former owner's
inventory shall be transferred to the new owner's track and trace account upon issuance of
the license.

...

(h) Except as permitted under Business and Professions Code section 26050.2(h),
licensees [sic] may not be transferred from one premises to another. Licensees shall not
operate out of a new premises until they have been issued a new license.

1 18. Title 4 of the CCR, section 15037, states in pertinent part:

2 (a) Licensees must keep and maintain records in connection with the licensed
3 commercial cannabis business. Records must be kept for at least seven years from the
date of creation, unless a shorter time is specified. Records include, but are not limited to:

4 . . .

5 (7) Records required by the Act or this division.

6 . . .

7 19. Title 4 of the CCR, section 15044, states in pertinent part:

8 . . .

9 (i) Surveillance recordings are subject to inspection by the Department and shall be
10 kept in a manner that allows the Department to view and obtain copies of the recordings at
the licensed premises immediately upon request. The licensee shall also send or otherwise
11 provide copies of the recordings to the Department upon request within the time specified
by the Department.

12 . . .

13 20. Title 4 of the CCR, section 17800, states in part:

14 (a) The Department and its authorized representatives, for purposes of inspection,
15 investigation, review, or audit, shall have full and immediate access to:

16 (1) Enter any premises licensed by the Department.

17 . . .

18 21. Title 4 of the CCR, section 17801 states:

19 (a) The Department may issue a Notice of Comply to a licensee for violation(s) of
the Act or this division discovered during an investigation or audit or observed during an
20 inspection.

21 (b) The Notice to Comply shall be in writing and describe the nature and facts of
each violation, including a reference to the statute or regulation violated, and may
22 indicate the manner in which the licensee must correct the violation(s) to achieve
compliance.

23 (c) The Department may serve the Notice to Comply personally, be email, or by
24 mail to the licensee or an employee, agent, or person delegated by the licensee to accept
notice.

25 (d) The licensee shall sign and return the Notice to Comply and describe how
26 compliance was achieved within 30 calendar days after the date of personal service or the
date of emailing or mailing of the notice or a different date specified by the Department.
27 The Department may also require the licensee to provide a plan for review and approval by
the Department on a case-by-case basis.

28 ///

(e) Failure to correct the violation(s) in the Notice to Comply may result in disciplinary action.

COST RECOVERY

22. Section 26031.1 of the Code states:

(a) Except as otherwise provided by law, in an order issued in resolution of a disciplinary proceeding before the department, the administrative law judge, upon request, may direct a licensee found to have committed a violation to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

(b) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the department or its designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(c) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the department to increase the cost award. The department may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

(d) If an order for recovery of costs is made and timely payment is not made as directed in the department's decision, the department may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the department may have as to any licensee to pay costs.

(e) In any action for recovery of costs, proof of the department's decision shall be conclusive proof of the validity of the order of payment and the terms for payment.

(f)(1) Except as provided in paragraph (2), the department shall not renew or reinstate the license of any licensee who has failed to pay all of the costs ordered under this section.

(2) Notwithstanding paragraph (1), the department may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the department to reimburse the department within that one-year period for the unpaid costs.

(g) All costs recovered under this section shall be considered a reimbursement for costs incurred and shall be deposited into the Cannabis Control Fund to be available upon appropriation by the Legislature.

(h) Nothing in this section shall preclude the department from including the recovery of the costs of investigation and enforcement of a case in any stipulated settlement.

FACTUAL ALLEGATIONS

23. On September 3, 2024, the California Department of Tax and Fee Administration (CDTFA) revoked Respondent's cannabis seller's permit.

24. Following correspondence with CDTFA regarding the revocation of Respondent's cannabis seller's permit, on November 20, 2024, Department Supervising Special Investigator (SSI) Aric Engkabo (Engkabo) sent a "Notice to Comply"¹ (NTC), via email, to Respondent, and its Owners, that it was in violation of cannabis regulations for conducting commercial cannabis activities without a valid seller's permit. The NTC further instructed Respondent, and its Owners, to provide the Department with proof that Respondent had obtained a current and active cannabis seller's permit and to complete, sign, and return the NTC to the Department by November 30, 2024. On December 3, 2024, after receiving no response, Department Special Investigator (SI) Isabel Sanchez (Sanchez) sent a follow-up email to Respondent informing that it had failed to respond or provide a current and active cannabis seller's permit by November 30, 2024.

25. Subsequently, on December 11, 2024, SI Sanchez, along with Department SI Bob Topping, attempted to conduct a regulatory compliance inspection of Respondent's licensed premises. However, upon arrival, Department staff were unable to gain access to the licensed premises. Department staff then contacted Respondent's Owner, Owner Quyam, by telephone and he stated that no one was able to provide the Department staff with access to the licensed premises. While speaking with Owner Quyam, Department staff inquired about the status, and non-response, to the November 20, 2024, NTC, and whether Respondent had obtained a current and valid cannabis seller's permit. Owner Quyam stated that Respondent was actively using the seller's permit of "AQ Logistics LLC's" for its continued commercial cannabis activities.

26. On December 12, 2024, Department staff received an email from Owner Quyam, which included a response to the November 20, 2024, NTC, and attached a copy of "AQ Logistics LLC's" seller's permit, which showed that it was located at 6430 Preston Ave, Suite B, Livermore, CA 94551. Department staff then searched the Department's licensing database and

¹ A "Notice to Comply" is a written document issued by the Department to a licensee requiring the licensee to change or modify a premise and/or activity to bring the licensee into compliance with Department regulations.

1 confirmed that AQ Logistics LLC is not licensed to conduct any commercial cannabis activities.
2 Finally, Department staff confirmed that Respondent never notified the Department of an intent to
3 sell Respondent's license or change ownership to AQ Logistics LLC.

4 27. On December 17, 2024, Department staff reviewed Respondent's California Cannabis
5 Track and Trace (CCTT) account and found that Respondent had conducted approximately 584
6 sales of cannabis products from September 3, 2024, through December 17, 2024, despite
7 CDTFA's revocation of its seller's permit.

8 28. On January 16, 2025, Department staff met with Respondent's licensed premises
9 property manager, who confirmed that she had served Respondent with a Notice to Pay or Quit on
10 November 18, 2024, by entering the licensed premises and confirming that Respondent was no
11 longer present, nor conducting commercial cannabis activities at the licensed premises, since that
12 date. On January 16, 2025, she also allowed Department staff access into the licensed premises,
13 which showed that Respondent was no longer operating out of the licensed premises. Later that
14 day, Department staff emailed Respondent's Owners and requested video surveillance footage for
15 January 8, 2025, through January 9, 2025, as the CCTT database indicated that there were four
16 manifests received by Respondent during that time period.

17 29. On January 17, 2025, Department staff again reviewed Respondent's CCTT account
18 which evidenced that from December 17, 2024, through January 17, 2025, Respondent had 265
19 cannabis packages in its inventory which consisted of 217 units of cannabis edibles, 553 units of
20 cannabis extract, 827 units of packaged cannabis flower, 142 units of other cannabis concentrate,
21 9 units of cannabis flower pre-rolls, 341 units of cannabis infused pre-rolls, 74 units of packaged
22 cannabis shake, 81 units of cannabis tinctures, and 619 units of cannabis vape cartridges.
23 Moreover, the CCTT account showed that Respondent had accepted 5 out of 8 incoming cannabis
24 transfers, and A & J had also conducted approximately 198 sales during the same period. Such
25 inventory was not present when the Department's staff gained access on the prior day.

26 30. As of January 21, 2025, the Department had not received the video surveillance
27 requested on January 16, 2025.

28 ///

1 **FIRST CAUSE FOR DISCIPLINE**

2 (Valid Seller's Permit)

3 31. Respondent is subject to disciplinary action pursuant to Code sections 26030,
4 subdivisions (a) and (d), and 26051.5, subdivision (a)(6), and Title 4 of the California Code of
5 Regulations, section 15002, subdivision (c)(20), in that Respondent failed to maintain a current
6 and valid seller's permit, as more particularly alleged in paragraphs 23, through 27, above, which
7 are hereby incorporated by reference and realleged as if fully set forth herein.

8 **SECOND CAUSE FOR DISCIPLINE**

9 (Cannabis Activity with Unlicensed Individuals)

10 32. Respondent is further subject to disciplinary action under Code section 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15000.1, subdivision
12 (b), in that Respondent engaged in commercial cannabis activity with unlicensed individuals as
13 more particularly alleged in paragraph 26, above, which is hereby incorporated by reference and
14 realleged as if fully set forth herein.

15 **THIRD CAUSE FOR DISCIPLINE**

16 (Access to Licensed Premises)

17 33. Respondent is further subject to disciplinary action under Code section 26030,
18 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, sections 15000.3,
19 subdivision (d) and 17800, subdivision (a), in that Respondent did not allow the Department
20 immediate access to the licensed premises as more particularly alleged in paragraph 25, which is
21 hereby incorporated by reference and realleged as if fully set forth herein.

22 **FOURTH CAUSE FOR DISCIPLINE**

23 (Business Modifications)

24 34. Respondent is further subject to disciplinary action under Code section 26030,
25 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15023,
26 subdivision (c), in that Respondent failed to comply with the change in ownership requirements,
27 as more particularly alleged in paragraphs 25 and 26, above, which are incorporated by reference
28 and realleged as if fully set forth herein.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Video Surveillance)

3 35. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), 26160, and Title 4 of the California Code of Regulations, sections 15037,
5 subdivision (a) and 15044, subdivision (i), in that Respondent failed to provide the Department
6 with copies of surveillance recordings within the time specified by the Department, as more
7 particularly alleged in paragraphs 28 and 30, above, which are hereby incorporated by reference
8 and realleged as if fully set forth herein.

9 **SIXTH CAUSE FOR DISCIPLINE**

10 (Notice to Comply)

11 36. Respondent is further subject to disciplinary action under Code section 26030,
12 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 17801,
13 subdivisions (a) and (e), in that Respondent failed to correct the violation(s) in the November 20,
14 2024, Notice to Comply issued by the Department to Respondent, as more particularly alleged in
15 paragraphs 24 through 29, above, which are hereby incorporated by reference and realleged as if
16 fully set forth herein.

17 **SEVENTH CAUSE FOR DISCIPLINE**

18 (Storage of Inventory)

19 37. Respondent is further subject to disciplinary action under Code section 26030,
20 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15000.7,
21 subdivision (a), in that Respondent failed to store cannabis and cannabis products within its
22 licensed premises, as more particularly alleged in paragraph 29, above, which is hereby
23 incorporated by reference and realleged as if fully set forth herein.

24 ///

25 ///

26 ///

27 ///

1 **PRAYER**

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that the following the hearing, the Director of Department of Cannabis Control issue a
4 decision:

5 1. Revoking or suspending outright or suspending with terms and conditions or fining or
6 any combination thereof, the Cannabis - Retailer Non-Storefront License Number C9-0000273-
7 LIC, issued to A & J Management Services LLC dba E.G. Organics with Abdul Qayum and
8 Jacob Bonales, Owners;

9 2. Ordering Respondent A & J Management Services LLC dba E.G. Organics with
10 Abdul Qayum and Jacob Bonales, Owners, to pay the Department of Cannabis Control the
11 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
12 Professions Code section 26021.1;

13 3. Ordering the destruction of cannabis and cannabis goods in the possession of A & J
14 Management Services LLC dba E.G. Organics with Abdul Qayum and Jacob Bonales, Owners, at
15 Respondent's expense, if revocation of Cannabis - Retailer Non-Storefront License Number C9-
16 0000273-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1,
17 subdivision (a); and

18 4. Taking such other and further action as deemed necessary and proper.
19

20
21 DATED: November 5, 2025

Evelyn Schaeffer

EVELYN SCHAEFFER
Deputy Director of the Compliance
Division
Department of Cannabis Control
State of California
Complainant

22
23
24
25
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27
28 SA2025801749

**BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**A & J MANAGEMENT SERVICES LLC
DBA E.G. ORGANICS; ABDUL QAYUM,
OWNER
7700 Edgewater Drive, Suite 202
Oakland, CA 94621**

**Cannabis Retailer - Non-Storefront License
No. C9-0000273-LIC**

Respondent.

Case No. DCC24-0002659-INV

**DEFAULT DECISION INVESTIGATORY
EVIDENCE PACKET**

[Gov. Code §11520]

The Default Decision Investigatory Evidence Packet in support of the Default Decision and Order in the above-entitled matter consists of the following.

Exhibit 1: Pleadings offered for jurisdictional purposes: Accusation No. DCC24-0002659-INV, statement to respondent notice of defense (two blank copies), request for discovery, discovery statutes (government code sections 11507.5, 11507.6 and 11507.7), proofs of service;

Exhibit 2: License History Certification for A & J Management Services LLC Cannabis Retailer - Non-Storefront License No. C9-0000273-LIC;

Exhibit 3: Certification of Costs by Department for Investigation in Case No. DCC24-0002659-INV dated December 10, 2025;

Exhibit 4: Certification of Costs by Department for Enforcement in Case No. DCC24-0002659-INV dated December 16, 2025;

Exhibit 5: Investigative Report (without attachments) [DCC25-0002659-INV.];
Dated: December 16, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California

GREGORY M. CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

Exhibit 1

Accusation No. DCC24-0002659-INV

Statement to Respondent

Notice of Defense

Request for Discovery

Discovery Statutes, Proofs of Service

1 ROB BONTA
Attorney General of California
2 HARINDER KAPUR
Supervising Deputy Attorney General
3 GREGORY CRIBBS
Supervising Deputy Attorney General
4 State Bar No. 175642
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6259
6 Facsimile: (916) 732-7920
E-mail: Gregory.Cribbs@doj.ca.gov
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM**
AND JACOB BONALES, OWNERS

STATEMENT TO RESPONDENT

[Gov. Code §§ 11504, 11505(b)]

14 Respondent.

15
16
17
18 **TO RESPONDENT:**

19 Enclosed is a copy of the Accusation that has been filed with the Department of Cannabis
20 Control (Department), and which is hereby served on you.

21 Unless a written request for a hearing signed by you or on your behalf is delivered or
22 mailed to the Department, represented by Supervising Deputy Attorney General Gregory Cribbs,
23 within fifteen (15) days after a copy of the Accusation was personally served on you or mailed to
24 you, you will be deemed to have waived your right to a hearing in this matter and the Department
25 may proceed upon the Accusation without a hearing and may take action thereon as provided by
26 law.
27
28

1 The request for hearing may be made by delivering or mailing one of the enclosed forms
2 entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in
3 section 11506 of the Government Code, to

4 **Gregory M. Cribbs**
5 **Supervising Deputy Attorney General**
6 **300 South Spring Street, Suite 1702**
7 **Los Angeles, CA 90013**

8 You may, but need not, be represented by counsel at any or all stages of these proceedings.

9 The enclosed Notice of Defense, if signed and filed with the Department, shall be deemed a
10 specific denial of all parts of the Accusation, but you will not be permitted to raise any objection
11 to the form of the Accusation unless you file a further Notice of Defense as provided in section
12 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

13 If you file any Notice of Defense within the time permitted, a hearing will be held on the
14 charges made in the Accusation.

15 The hearing may be postponed for good cause. If you have good cause, you are obliged to
16 notify the Office of Administrative Hearings, 1515 Clay Street, Suite 206, Oakland, CA 94612,
17 within ten (10) working days after you discover the good cause. Failure to notify the Office of
18 Administrative Hearings within ten (10) days will deprive you of a postponement.

19 Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

20 If you desire the names and addresses of witnesses or an opportunity to inspect and copy
21 the items mentioned in section 11507.6 of the Government Code in the possession, custody or
22 control of the Department you may send a Request for Discovery to the above designated
23 Supervising Deputy Attorney General.

24 **NOTICE REGARDING STIPULATED SETTLEMENTS**

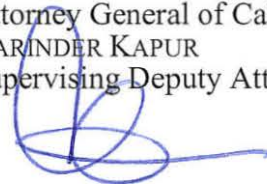
25 It may be possible to avoid the time, expense and uncertainties involved in an
26 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated
27 settlement is a binding written agreement between you and the government regarding the matters
28 charged and the discipline to be imposed. Such a stipulation would have to be approved by the
Department of Cannabis Control but, once approved, it would be incorporated into a final order.

1 Any stipulation must be consistent with the Department's established disciplinary
2 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the
3 Department's Disciplinary Guidelines will be provided to you on your written request to the state
4 agency bringing this action.

5 If you are interested in pursuing this alternative to a formal administrative hearing, or if you
6 have any questions, you or your attorney should contact Supervising Deputy Attorney General
7 Gregory Cribbs at the earliest opportunity.

8 Dated: November 6, 2025

ROB BONTA
Attorney General of California
HARINDER KAPUR
Supervising Deputy Attorney General



GREGORY CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

27 SA2025801749
28 68054057

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 GREGORY M. CRIBBS
Supervising Deputy Attorney General
4 State Bar No. 175642
300 S. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6259
6 E-mail: Gregory.Cribbs@doj.ca.gov
Attorneys for Complainant
7

8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM**
14 **AND JACOB BONALES, OWNERS**
7700 Edgewater Drive, Suite 202
Oakland, CA 94621

ACCUSATION

15 **Cannabis - Retailer Non-Storefront License**
16 **No. C9-0000273-LIC**

Respondent.

17
18 **PARTIES**

19 1. Evelyn Schaeffer (Complainant) brings this Accusation solely in her official capacity
20 as the Deputy Director of the Compliance Division of the Department of Cannabis Control
21 (Department).

22 2. The Department issued Cannabis - Retailer Non-Storefront License
23 No. C9-0000273-LIC to A & J Management Services LLC dba E.G. Organics (Respondent) with
24 Abdul Qayum (Owner Qayum) and Jacob Bonales as Owners (collectively Owners). The
25 Cannabis – Retailer Non-Storefront License was in full force and effect at all times relevant to the
26 charges brought herein and expired on August 28, 2025.

27 ///

28 ///

JURISDICTION

3. This Accusation is brought before the Director of the Department (Director), under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 26010 of the Code states:

There is in the Business, Consumer Services, and Housing Agency, the Department of Cannabis Control under the supervision and control of a director. The director shall administer and enforce the provisions of this division related to the department.

5. Section 26010.5, subdivision (d), of the Code states:

The department has the power, duty, purpose, responsibility, and jurisdiction to regulate commercial cannabis activity as provided in this division.

6. Section 26012, subdivision (a), of the Code states:

It being a matter of statewide concern, except as otherwise authorized in this division, the department shall have the sole authority to create, issue, deny, renew, discipline, condition, suspend, or revoke licenses for commercial cannabis activity.

7. Section 26013, subdivision (a), of the Code states:

The department shall make and prescribe reasonable rules and regulations as may be necessary to implement, administer, and enforce its duties under this division in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code. Those rules and regulations shall be consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of Marijuana Act.

8. Section 26031 of the Code states:

(a) The department may suspend, revoke, place on probation with terms and conditions, or otherwise discipline licenses issued by the department and fine a licensee, after proper notice and hearing to the licensee, except as provided in Section 26031.01, if the licensee is found to have committed any of the acts or omissions constituting grounds for disciplinary action. The disciplinary proceedings under this chapter shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director shall have all the powers granted therein.

(b) The department may suspend or revoke a license when a local agency has notified the department that a licensee within its jurisdiction is in violation of state rules and regulations relating to commercial cannabis activities, and the department, through an investigation, has determined that the violation is grounds for suspension or revocation of the license.

1 (c) The department may take disciplinary action against a licensee for any
2 violation of this division when the violation was committed by the licensee's officers,
3 directors, owners, agents, or employees while acting on behalf of the licensee or
engaged in commercial cannabis activity.

4 (d) The suspension or expiration of a license issued by the department, or its
5 suspension, forfeiture, or cancellation by order of the department or by order of a
6 court of law, or its surrender without the written consent of the department, shall not,
7 during any period in which it may be renewed, restored, reissued, or reinstated,
deprive the department of its authority to institute or continue a disciplinary
proceeding against the licensee upon any ground provided by law or to enter an order
suspending or revoking the license or otherwise taking disciplinary action against the
licensee on any such ground.

8 9. Section 26034 of the Code states:

9 All accusations against licensees shall be filed by the department within five
10 years after the performance of the act or omission alleged as the ground for
11 disciplinary action; provided, however, that the foregoing provision shall not
12 constitute a defense to an accusation alleging fraud or misrepresentation as a ground
13 for disciplinary action. The cause for disciplinary action in that case shall not be
deemed to have accrued until discovery, by the department, of the facts constituting
the fraud or misrepresentation, and, in that case, the accusation shall be filed within
five years after that discovery.

14 **STATUTORY PROVISIONS**

15 10. Section 26030 of the Code states:

16 Grounds for disciplinary action include, but are not limited to, all of the
17 following:

18 (a) Failure to comply with the provisions of this division or any rule or
regulation adopted pursuant to this division.

19 . . .

20 (c) Any other grounds contained in regulations adopted by the department
21 pursuant to this division.

22 (d) Failure to comply with any state law including, but not limited to, the
23 payment of taxes as required under the Revenue and Taxation Code, except as
provided for in this division or other California law.

24 . . .

25 11. Section 26051.5 of the Code states:

26 (a) An applicant for a state license pursuant to this division to conduct
27 commercial cannabis activity, as defined in Section 26001, shall do all of
the following:

28 . . .

1 (6) Provide the applicant's valid seller's permit number issued pursuant to Part
2 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation Code
or indicate that the applicant is currently applying for a seller's permit.

3 ...

4 12. Section 26160 of the Code states:

5 (a) A licensee shall keep accurate records of commercial cannabis activity.

6 (b) All records related to commercial cannabis activity as defined by the
7 department shall be maintained for a minimum of seven years.

8 (c) The department may examine the records of a licensee and inspect the
premises of as the department, or a state or local agency, deems necessary to perform
9 its duties under this division. All inspections and examinations of records shall be
conducted during standard business hours of the licensed facility or at any other
10 reasonable time. Licensees shall provide and deliver records to the department upon
request.

11 (d) Licensees shall keep records identified by the department on the premises
of the location licensed. The department may make any examination of the records or
12 any licensee. Licensees shall also provide and deliver copies of documents to the
department upon request.

13 (e) A licensee, or its agent or employee, that refuses, impedes, obstructs, or
14 interferes with an inspection of the premises or records of the licensee pursuant to this
section, has engaged in a violation of this division.

15 ...

16 **REGULATORY PROVISIONS**

17
18 13. Title 4 of the California Code of Regulations (CCR), section 15000.1 states:

19 (a) Every person who conducts commercial cannabis activity shall obtain and
20 maintain a valid license from the Department for each separate premises at which
commercial cannabis activity is conducted.

21 ...

22 14. Title 4 of the CCR, section 15000.3, states in pertinent part:

23 ...

24 (d) Licensees shall ensure that the Department has immediate access to their licensed
premises. If the Department is denied access to a licensee's premises for any reason, the
25 licensee shall be held responsible and subject to discipline. If the Department is denied
access to one licensee's premises because of another licensee's refusal to grant access
26 when the only access to one licensed premises is through another licensed premises, all
licensees shall be held responsible and subject to discipline.

27 ...

1 15. Title 4 of the CCR, section 15000.7, states in pertinent part:

2 (a) All cannabis and cannabis products must be stored within the licensed premises.

3 ...

4 16. Title 4 of the CCR, section 15002, states in part:

5 ...

6 (c) An application must be completed by an owner as defined by section 15003.
7 An application for an annual cannabis license includes the following:

8

9 (20) The applicant shall provide a valid seller's permit number issued by the
10 California Department of Tax and Fee Administration, if applicable. If the
11 commercial cannabis business has not yet received a seller's permit, the commercial
12 cannabis business shall attest that the commercial cannabis business is currently
13 applying for a seller's permit....

14 17. Title 4 of the CCR, section 15023 states:

15 Business modifications shall be made in accordance with the following:

16 ...

17 (c) Licenses are not transferrable or assignable to another person or owner. In the
18 event of the sale or other transfer of the business operations covered by the licensee,
19 changes in ownership shall be made in accordance with the following:

20 (1) If one or more of the owners change, the new owners shall submit the
21 information required under section 15002(c)(16) for each new owner to the Department
22 within 14 calendar days of the effective date of the ownership change. The business may
23 continue to operate under the active license while the Department reviews the
24 qualifications of the new owner(s) in accordance with the Act and these regulations to
25 determine whether the change would constitute grounds for denial of the license, if at least
26 one existing owner is not transferring their ownership interest and will remain as an owner
27 under the new ownership structure. If all owners will be transferring their ownership
28 interest, the business shall not operate under the new ownership structure until a new
license application has been submitted to and approved by the Department, and all
application and license fees for the new application have been paid. The former owner's
inventory shall be transferred to the new owner's track and trace account upon issuance of
the license.

...

(h) Except as permitted under Business and Professions Code section 26050.2(h),
licensees [sic] may not be transferred from one premises to another. Licensees shall not
operate out of a new premises until they have been issued a new license.

1 18. Title 4 of the CCR, section 15037, states in pertinent part:

2 (a) Licensees must keep and maintain records in connection with the licensed
3 commercial cannabis business. Records must be kept for at least seven years from the
date of creation, unless a shorter time is specified. Records include, but are not limited to:

4 . . .

5 (7) Records required by the Act or this division.

6 . . .

7 19. Title 4 of the CCR, section 15044, states in pertinent part:

8 . . .

9 (i) Surveillance recordings are subject to inspection by the Department and shall be
10 kept in a manner that allows the Department to view and obtain copies of the recordings at
the licensed premises immediately upon request. The licensee shall also send or otherwise
11 provide copies of the recordings to the Department upon request within the time specified
by the Department.

12 . . .

13 20. Title 4 of the CCR, section 17800, states in part:

14 (a) The Department and its authorized representatives, for purposes of inspection,
15 investigation, review, or audit, shall have full and immediate access to:

16 (1) Enter any premises licensed by the Department.

17 . . .

18 21. Title 4 of the CCR, section 17801 states:

19 (a) The Department may issue a Notice of Comply to a licensee for violation(s) of
the Act or this division discovered during an investigation or audit or observed during an
20 inspection.

21 (b) The Notice to Comply shall be in writing and describe the nature and facts of
each violation, including a reference to the statute or regulation violated, and may
22 indicate the manner in which the licensee must correct the violation(s) to achieve
compliance.

23 (c) The Department may serve the Notice to Comply personally, be email, or by
24 mail to the licensee or an employee, agent, or person delegated by the licensee to accept
notice.

25 (d) The licensee shall sign and return the Notice to Comply and describe how
26 compliance was achieved within 30 calendar days after the date of personal service or the
date of emailing or mailing of the notice or a different date specified by the Department.
27 The Department may also require the licensee to provide a plan for review and approval by
the Department on a case-by-case basis.

28 ///

(e) Failure to correct the violation(s) in the Notice to Comply may result in disciplinary action.

COST RECOVERY

22. Section 26031.1 of the Code states:

(a) Except as otherwise provided by law, in an order issued in resolution of a disciplinary proceeding before the department, the administrative law judge, upon request, may direct a licensee found to have committed a violation to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

(b) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the department or its designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(c) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the department to increase the cost award. The department may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

(d) If an order for recovery of costs is made and timely payment is not made as directed in the department's decision, the department may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the department may have as to any licensee to pay costs.

(e) In any action for recovery of costs, proof of the department's decision shall be conclusive proof of the validity of the order of payment and the terms for payment.

(f)(1) Except as provided in paragraph (2), the department shall not renew or reinstate the license of any licensee who has failed to pay all of the costs ordered under this section.

(2) Notwithstanding paragraph (1), the department may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the department to reimburse the department within that one-year period for the unpaid costs.

(g) All costs recovered under this section shall be considered a reimbursement for costs incurred and shall be deposited into the Cannabis Control Fund to be available upon appropriation by the Legislature.

(h) Nothing in this section shall preclude the department from including the recovery of the costs of investigation and enforcement of a case in any stipulated settlement.

FACTUAL ALLEGATIONS

23. On September 3, 2024, the California Department of Tax and Fee Administration (CDTFA) revoked Respondent's cannabis seller's permit.

24. Following correspondence with CDTFA regarding the revocation of Respondent's cannabis seller's permit, on November 20, 2024, Department Supervising Special Investigator (SSI) Aric Engkabo (Engkabo) sent a "Notice to Comply"¹ (NTC), via email, to Respondent, and its Owners, that it was in violation of cannabis regulations for conducting commercial cannabis activities without a valid seller's permit. The NTC further instructed Respondent, and its Owners, to provide the Department with proof that Respondent had obtained a current and active cannabis seller's permit and to complete, sign, and return the NTC to the Department by November 30, 2024. On December 3, 2024, after receiving no response, Department Special Investigator (SI) Isabel Sanchez (Sanchez) sent a follow-up email to Respondent informing that it had failed to respond or provide a current and active cannabis seller's permit by November 30, 2024.

25. Subsequently, on December 11, 2024, SI Sanchez, along with Department SI Bob Topping, attempted to conduct a regulatory compliance inspection of Respondent's licensed premises. However, upon arrival, Department staff were unable to gain access to the licensed premises. Department staff then contacted Respondent's Owner, Owner Quyam, by telephone and he stated that no one was able to provide the Department staff with access to the licensed premises. While speaking with Owner Quyam, Department staff inquired about the status, and non-response, to the November 20, 2024, NTC, and whether Respondent had obtained a current and valid cannabis seller's permit. Owner Quyam stated that Respondent was actively using the seller's permit of "AQ Logistics LLC's" for its continued commercial cannabis activities.

26. On December 12, 2024, Department staff received an email from Owner Quyam, which included a response to the November 20, 2024, NTC, and attached a copy of "AQ Logistics LLC's" seller's permit, which showed that it was located at 6430 Preston Ave, Suite B, Livermore, CA 94551. Department staff then searched the Department's licensing database and

¹ A "Notice to Comply" is a written document issued by the Department to a licensee requiring the licensee to change or modify a premise and/or activity to bring the licensee into compliance with Department regulations.

1 confirmed that AQ Logistics LLC is not licensed to conduct any commercial cannabis activities.
2 Finally, Department staff confirmed that Respondent never notified the Department of an intent to
3 sell Respondent's license or change ownership to AQ Logistics LLC.

4 27. On December 17, 2024, Department staff reviewed Respondent's California Cannabis
5 Track and Trace (CCTT) account and found that Respondent had conducted approximately 584
6 sales of cannabis products from September 3, 2024, through December 17, 2024, despite
7 CDTFA's revocation of its seller's permit.

8 28. On January 16, 2025, Department staff met with Respondent's licensed premises
9 property manager, who confirmed that she had served Respondent with a Notice to Pay or Quit on
10 November 18, 2024, by entering the licensed premises and confirming that Respondent was no
11 longer present, nor conducting commercial cannabis activities at the licensed premises, since that
12 date. On January 16, 2025, she also allowed Department staff access into the licensed premises,
13 which showed that Respondent was no longer operating out of the licensed premises. Later that
14 day, Department staff emailed Respondent's Owners and requested video surveillance footage for
15 January 8, 2025, through January 9, 2025, as the CCTT database indicated that there were four
16 manifests received by Respondent during that time period.

17 29. On January 17, 2025, Department staff again reviewed Respondent's CCTT account
18 which evidenced that from December 17, 2024, through January 17, 2025, Respondent had 265
19 cannabis packages in its inventory which consisted of 217 units of cannabis edibles, 553 units of
20 cannabis extract, 827 units of packaged cannabis flower, 142 units of other cannabis concentrate,
21 9 units of cannabis flower pre-rolls, 341 units of cannabis infused pre-rolls, 74 units of packaged
22 cannabis shake, 81 units of cannabis tinctures, and 619 units of cannabis vape cartridges.
23 Moreover, the CCTT account showed that Respondent had accepted 5 out of 8 incoming cannabis
24 transfers, and A & J had also conducted approximately 198 sales during the same period. Such
25 inventory was not present when the Department's staff gained access on the prior day.

26 30. As of January 21, 2025, the Department had not received the video surveillance
27 requested on January 16, 2025.

28 ///

1 **FIRST CAUSE FOR DISCIPLINE**

2 (Valid Seller's Permit)

3 31. Respondent is subject to disciplinary action pursuant to Code sections 26030,
4 subdivisions (a) and (d), and 26051.5, subdivision (a)(6), and Title 4 of the California Code of
5 Regulations, section 15002, subdivision (c)(20), in that Respondent failed to maintain a current
6 and valid seller's permit, as more particularly alleged in paragraphs 23, through 27, above, which
7 are hereby incorporated by reference and realleged as if fully set forth herein.

8 **SECOND CAUSE FOR DISCIPLINE**

9 (Cannabis Activity with Unlicensed Individuals)

10 32. Respondent is further subject to disciplinary action under Code section 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15000.1, subdivision
12 (b), in that Respondent engaged in commercial cannabis activity with unlicensed individuals as
13 more particularly alleged in paragraph 26, above, which is hereby incorporated by reference and
14 realleged as if fully set forth herein.

15 **THIRD CAUSE FOR DISCIPLINE**

16 (Access to Licensed Premises)

17 33. Respondent is further subject to disciplinary action under Code section 26030,
18 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, sections 15000.3,
19 subdivision (d) and 17800, subdivision (a), in that Respondent did not allow the Department
20 immediate access to the licensed premises as more particularly alleged in paragraph 25, which is
21 hereby incorporated by reference and realleged as if fully set forth herein.

22 **FOURTH CAUSE FOR DISCIPLINE**

23 (Business Modifications)

24 34. Respondent is further subject to disciplinary action under Code section 26030,
25 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15023,
26 subdivision (c), in that Respondent failed to comply with the change in ownership requirements,
27 as more particularly alleged in paragraphs 25 and 26, above, which are incorporated by reference
28 and realleged as if fully set forth herein.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Video Surveillance)

3 35. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), 26160, and Title 4 of the California Code of Regulations, sections 15037,
5 subdivision (a) and 15044, subdivision (i), in that Respondent failed to provide the Department
6 with copies of surveillance recordings within the time specified by the Department, as more
7 particularly alleged in paragraphs 28 and 30, above, which are hereby incorporated by reference
8 and realleged as if fully set forth herein.

9 **SIXTH CAUSE FOR DISCIPLINE**

10 (Notice to Comply)

11 36. Respondent is further subject to disciplinary action under Code section 26030,
12 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 17801,
13 subdivisions (a) and (e), in that Respondent failed to correct the violation(s) in the November 20,
14 2024, Notice to Comply issued by the Department to Respondent, as more particularly alleged in
15 paragraphs 24 through 29, above, which are hereby incorporated by reference and realleged as if
16 fully set forth herein.

17 **SEVENTH CAUSE FOR DISCIPLINE**

18 (Storage of Inventory)

19 37. Respondent is further subject to disciplinary action under Code section 26030,
20 subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15000.7,
21 subdivision (a), in that Respondent failed to store cannabis and cannabis products within its
22 licensed premises, as more particularly alleged in paragraph 29, above, which is hereby
23 incorporated by reference and realleged as if fully set forth herein.

24 ///

25 ///

26 ///

27 ///

1 **PRAYER**

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that the following the hearing, the Director of Department of Cannabis Control issue a
4 decision:

5 1. Revoking or suspending outright or suspending with terms and conditions or fining or
6 any combination thereof, the Cannabis - Retailer Non-Storefront License Number C9-0000273-
7 LIC, issued to A & J Management Services LLC dba E.G. Organics with Abdul Qayum and
8 Jacob Bonales, Owners;

9 2. Ordering Respondent A & J Management Services LLC dba E.G. Organics with
10 Abdul Qayum and Jacob Bonales, Owners, to pay the Department of Cannabis Control the
11 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
12 Professions Code section 26021.1;

13 3. Ordering the destruction of cannabis and cannabis goods in the possession of A & J
14 Management Services LLC dba E.G. Organics with Abdul Qayum and Jacob Bonales, Owners, at
15 Respondent's expense, if revocation of Cannabis - Retailer Non-Storefront License Number C9-
16 0000273-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1,
17 subdivision (a); and

18 4. Taking such other and further action as deemed necessary and proper.
19

20
21 DATED: November 5, 2025

Evelyn Schaeffer

EVELYN SCHAEFFER
Deputy Director of the Compliance
Division
Department of Cannabis Control
State of California
Complainant

22
23
24
25
26
27
28 SA2025801749

1 ROB BONTA
Attorney General of California
2 HARINDER KAPUR
Supervising Deputy Attorney General
3 GREGORY CRIBBS
Supervising Deputy Attorney General
4 State Bar No. 175642
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6259
6 Facsimile: (916) 732-7920
E-mail: Gregory.Cribbs@doj.ca.gov
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM**
14 **AND JACOB BONALES, OWNERS**

REQUEST FOR DISCOVERY

Respondent.

15 TO RESPONDENT:

16 Under section 11507.6 of the Government Code of the State of California, parties to an
17 administrative hearing, including the Complainant, are entitled to certain information concerning
18 the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code
19 concerning such rights is included among the papers served.

20 PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE
21 HEREBY REQUESTED TO:

- 22 1. Provide the names and addresses of witnesses to the extent known to the Respondent,
23 including, but not limited to, those intended to be called to testify at the hearing, and
24 2. Provide an opportunity for the Complainant to inspect and make a copy of any of the
25 following in the possession or custody or under control of the Respondent:

- 26 a. A statement of a person, other than the Respondent, named in the
27 initial administrative pleading, or in any additional pleading, when it is claimed that
28

1 the act or omission of the Respondent as to this person is the basis for the
2 administrative proceeding;

3 b. A statement pertaining to the subject matter of the proceeding made
4 by any party to another party or persons;

5 c. Statements of witnesses then proposed to be called by the
6 Respondent and of other persons having personal knowledge of the acts, omissions or
7 events which are the basis for the proceeding, not included in (a) or (b) above;

8 d. All writings which the Respondent now proposes to offer in
9 evidence;

10 e. Any other writing or thing which is relevant and which would be
11 admissible in evidence;

12 f. Investigative reports made by or on behalf of the Respondent
13 pertaining to the subject matter of the proceeding, to the extent that these reports (1)
14 contain the names and addresses of witnesses or of persons having personal
15 knowledge of the acts, omissions or events which are the basis for the proceeding, or
16 (2) reflect matters perceived by the investigator in the course of his or her
17 investigation, or (3) contain or include by attachment any statement or writing
18 described in (a) to (e), inclusive, or summary thereof.

19 IN ADDITION, if cost recovery is requested in the pleading prayer, provide all writings
20 which will support any objection which may be made by the Respondent, to Respondent's
21 payment of investigation and enforcement costs to the Board.

22 For the purpose of this Request for Discovery, "statements" include written statements by
23 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical
24 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or
25 summaries of these oral statements.

26 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery
27 should be deemed to authorize the inspection or copying of any writing or thing which is
28

1 privileged from disclosure by law or otherwise made confidential or protected as attorney's work
2 product.

3 Your response to this Request for Discovery should be directed to the undersigned attorney
4 for the Complainant at the address on the first page of this Request for Discovery.

5 Failure without substantial justification to comply with this Request for Discovery may
6 subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the
7 Government Code.

8 Dated: November 6, 2025

ROB BONTA
Attorney General of California
HARINDER KAPUR
Supervising Deputy Attorney General



GREGORY CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

27 SA2025801749
28 68054057

**BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**A & J MANAGEMENT SERVICES LLC
DBA E.G. ORGANICS; ABDUL QAYUM
AND JACOB BONALES, OWNERS**

Respondent.

Case No. DCC24-0002659-INV

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail

Check one box:

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

Check box if applicable:

- ☐ I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at <https://cannabis.ca.gov> at https://www.dca.ca.gov/about_us/entities.shtml.

SA2025801749
68054057

**BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**A & J MANAGEMENT SERVICES LLC
DBA E.G. ORGANICS; ABDUL QAYUM
AND JACOB BONALES, OWNERS**

Respondent.

Case No. DCC24-0002659-INV

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

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I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail

Check one box:

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

Check box if applicable:

- ☐ I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at <https://cannabis.ca.gov> at https://www.dca.ca.gov/about_us/entities.shtml.

SA2025801749
68054057

COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505

SECTION 11507.5: Exclusivity of discovery provisions

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

SECTION 11507.6: Request for discovery

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

DECLARATION OF ELECTRONIC SERVICE AND SERVICE BY U.S. MAIL

Case Name: In the Matter of the Accusation against A & J Management Services LLC, dba E.G. Organics; Abdul Qayum, Owner.
Case Number: DCC24—0002659-INV
Party Represented: Department of Cannabis Control

Declaration of Electronic Service

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, County of Los Angeles.
3. My electronic service address is Cecilia.Apodaca@doj.ca.gov.
4. On November 6, 2025, I electronically served the following document[s]:

STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 COPIES), AND DISCOVERY STATUTES

5. I electronically served the aforementioned document[s] by emailing them to the following individual[s]:

elevatedgroupabdul@gmail.com

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on November 6, 2025.

Cecilia Apodaca

Declarant

/s/ Cecilia Apodaca

Signature

Declaration of Service by U.S. Mail

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, County of Los Angeles.
3. On November 6, 2025, I served the following document[s]:

STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 COPIES), AND DISCOVERY STATUTES

4. I served the aforementioned documents by mailing them to the following individual[s]:

**A & J Management Services, LLC dba
E.G. Organics
7700 Edgewater Drive, Suite 202
Oakland, CA 94621**

**Abdul Qayum, Owner and Designated
Responsible Party for A & J Management
Services,
LLC dba E.G. Organics
6150 Joaquin Murieta Avenue, Apt. D
Newark, CA 94560**

5. I am readily 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. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
6. On November 6, 2025, I enclosed the documents identified in paragraph [3] in a sealed envelope or package addressed to the persons at the address listed in paragraph [4] and placed the envelope for collection and mailing, following our ordinary business practices.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on November 6, 2025.

Janice Park
Declarant

/s/ Janice Park
Signature

SA2025801749
68055909

Exhibit 2

License History Certification for Respondent



Department of
Cannabis Control
CALIFORNIA

Department of Cannabis Control
licensing@cannabis.ca.gov, www.cannabis.ca.gov

Cannabis Retailer Nonstorefront License Adult-Use and Medicinal

Business Name:
A & J MANAGEMENT SERVICES LLC

E.G. Organics

License Number: C9-0000273-LIC
License Type: Retailer Nonstorefront
(Delivery)

The license authorizes A & J MANAGEMENT SERVICES LLC to engage in commercial cannabis Retail Nonstorefront (Delivery) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Valid: 8/29/2019
Expires: 8/28/2025

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.



Valid:
8/29/2019

Expires:
8/28/2025

License No:
C9-0000273-LIC

Legal Business Name:
A & J MANAGEMENT SERVICES LLC
E.G. Organics

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C9-0000273-LIC.



Department of
Cannabis Control
CALIFORNIA

Exhibit 3

Certification of Investigative Costs

**BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

**A & J MANAGEMENT SERVICES LLC
DBA E.G. ORGANICS;**

**ABDUL QAYUM AND JACOB BONALES,
OWNERS
7700 Edgewater Drive, Suite 202
Oakland, CA 94621**

**DECLARATION OF ARIC ENKABO
REGARDING INVESTIGATIVE
ACTIVITY**

**Cannabis – Retailer Non-Storefront License
No. C9-0000273-LIC**

Respondent.

I, Aric Engkabo, declare and certify as follows:

1. I am employed as a Supervising Special Investigator (SSI) within the Investigative Services Branch (ISB) of the Compliance Division of the Department of Cannabis Control (Department).

2. I have been designated as the Department representative to certify the costs of investigation in this case pursuant to Business and Professions Code section 26031.1. I make this certification in my official capacity as an SSI and as a public employee pursuant to Evidence Code section 664.

3. The following list of Special Investigators (SI) were assigned to the investigation of this case, which was opened by the Department's Compliance Division on or about November 18, 2024: Lead SI Isabel Sanchez, SI Bob Topping, and SSI Aric Engkabo.

4. In my official capacity as an SSI, I review the costs incurred by the Department's ISB in the enforcement of the laws and regulations under its jurisdiction and certify that these costs were incurred by the Department. I am familiar with the time recording practices of the

1 Department's Compliance Division for the reasonable and necessary investigative work
2 performed on a particular case. It is the duty of SIs to record the time spent on all investigative
3 activities at or near the time the activities are performed.

4 5. The investigative activity summary A&J Management C9-0000273-LIC
5 Certification of Cost Recovery includes the details of tasks performed by SIs. The costs related to
6 investigative activity include field time, research and report writing, meetings, and use of state
7 vehicles. I hereby certify that the A&J Management C9-0000273-LIC Certification of Cost
8 Recovery, attached hereto and herein incorporated by reference is a true and correct copy of the
9 investigative activity for this case. The investigative activity summary encompasses the total
10 hours spent by the Department's ISB through December 5, 2025. The investigative activity
11 summary does not include tasks performed after this date.

12 6. I certify pursuant to the provisions of Business and Professions Code section
13 26031.1 that to the best of my knowledge the costs of investigative services set forth in this
14 declaration are correct and were necessarily incurred in this case. The total hours of investigative
15 activity and rates applicable to the above-entitled case are as follows:

16 a) Special Investigator Field Time:

17 Rate per hour: \$101.00 multiplied by 15.5 hours = \$1,565.50

18 b) Research and Report Writing:

19 Rate per hour: \$101.00 multiplied by 20.5 hours = \$2,070.50

20 c) Use of State Vehicles:

21 2 vehicles at \$0.625 multiplied by 216.4 miles = \$135.25

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct and that this declaration was executed in Sacramento County on December
24 10, 2025.

25 Aric
26 Engkabo

Digitally signed by Aric
Engkabo
Date: 2025.12.09
16:29:53 -08'00'

27 Aric Engkabo
28 *Declarant*

Exhibit 4

Certification of Enforcement Costs

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 GREGORY M. CRIBBS
Supervising Deputy Attorney General
4 State Bar No. 175642
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6259
6 E-mail: Gregory.Cribbs@doj.ca.gov
Attorneys for Complainant
7

8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC24-0002659-INV

12 **A & J MANAGEMENT SERVICES LLC**
13 **DBA E.G. ORGANICS; ABDUL QAYUM,**
14 **OWNER**

Respondent.

CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF GREGORY M.
CRIBBS

Business and Professions Code section
26031.1]

15
16 I, GREGORY M. CRIBBS, hereby declare and certify as follows:

17 1. I am a Supervising Deputy Attorney General employed by the California Department
18 of Justice (DOJ), Office of the Attorney General (Office). I am assigned to the Cannabis Control
19 Section in the Civil Division of the Office. I have been designated as the representative to certify
20 the costs of prosecution by DOJ and incurred by the Department of Cannabis Control in this case.
21 I make this certification in my official capacity and as an officer of the court and as a public
22 employee pursuant to Evidence Code section 664.

23 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance
24 Division of the Department of Cannabis Control, in this action. I was assigned to handle this case
25 on or about May 28, 2025.

26 3. Our Office's computerized case management system reflects that the following
27 persons have also performed tasks related to this matter: Robert T. White, Deputy Attorney
28

1 General; Gregory Cribbs, Supervising Deputy Attorney General; Helen Koh, Senior Legal
2 Analyst; Harinder Kapur, Senior Assistant Attorney General.

3 4. I am familiar with the time recording and billing practices of DOJ and the procedure
4 for charging the client agency for the reasonable and necessary work performed on a particular
5 case. It is the duty of the time keeping employees to keep track of the time spent and to report
6 that time in DOJ's computerized case management system at or near the time of the tasks
7 performed.

8 5. On December 16, 2025, I requested a billing summary for this case from the
9 Accounting Department of the DOJ. In response, on December 16, 2025, I received a document
10 entitled "Matter Time Activity by Professional Type." I hereby certify that the Matter Time
11 Activity by Professional Type, attached hereto as Exhibit A, and herein incorporated by
12 reference, is a true and correct copy of the billing summary for this matter that I received from the
13 Accounting Department. The summary includes the billing costs incurred by me, as well as other
14 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the
15 amount of time billed for the activity, and the billing rate by professional type. The billing
16 summary is comprehensive of the charges by the Office to the Department of Cannabis Control
17 through December 16, 2025. It does not include billing for tasks performed after December 16,
18 2025, up to the date of hearing.

19 6. Based upon the time reported through December 16, 2025, as set forth in Exhibit A,
20 DOJ has billed the Department of Cannabis Control \$6,263.25 for the time spent working on the
21 above-entitled case.

22 7. To the best of my knowledge the items of cost set forth in this certification are correct
23 and were necessarily incurred in this case.

24 I certify under penalty of perjury under the laws of the State of California that the foregoing
25 is true and correct.

26 ///

27 ///

28 ///

Executed on 12/16, at Los Angeles, California.



GREGORY M. CRIBBS
Supervising Deputy Attorney General
Declarant

Exhibit A



Cost of Suit Summary

As of Dec 16, 2025

MatterID: SA2025801749
Description: A & J Management Services LLC (ACC)

Date Opened: May 28, 2025

Total Legal Costs: \$6,263.25
Cost of Suit: \$0.00
Grand Total: \$6,263.25

Totals include WIP time.

Rate	Hrs Wrkd	Amount
Matter Time Activity Summary		
Attorney		
2025-2026		
\$228.00	16.75	\$3,819.00
Total For: 2025-2026		\$3,819.00
2024-2025		
\$228.00	6.75	\$1,539.00
Total For: 2024-2025		\$1,539.00
Total for: Attorney		\$5,358.00
Paralegal		
2025-2026		
\$213.00	2.75	\$585.75
Total For: 2025-2026		\$585.75
2024-2025		
\$213.00	1.50	\$319.50
Total For: 2024-2025		\$319.50
Total for: Paralegal		\$905.25
Total Legal Costs		\$6,263.25

Entry No	Journal Date	Vendor #	Vendor	Schedule	Reference	Amount
Cost of Suit						
* Denotes soft costs which are not included in totals.						



Matter Time Activity By Professional Type

As of Dec 16, 2025

Matter ID: SA2025801749					Date Opened: 05/28/2025				
Description: A & J Management Services LLC (ACC)									
Professional Type: Attorney									
Fiscal Year: 2025									
Professional: Gregory M. Cribbs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605747922	8/15/25	CV-CCS:290	02668	Supervisory Review	1.50	\$228.00	\$342.00		8/31/25
605764862	8/25/25	CV-CCS:290	02668	Supervisory Review	0.75	\$228.00	\$171.00		8/31/25
605764865	8/26/25	CV-CCS:290	02668	Supervisory Review	1.50	\$228.00	\$342.00		8/31/25
605767117	8/27/25	CV-CCS:290	02668	Supervisory Review	0.50	\$228.00	\$114.00		8/31/25
605785707	9/5/25	CV-CCS:290	02668	Supervisory Review	0.50	\$228.00	\$114.00		9/30/25
605878716	10/30/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		10/31/25
605891557	11/5/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		11/30/25
605892746	11/6/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		11/30/25
605910749	11/18/25	CV-CCS:290	02668	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/25
Gregory M. Cribbs Totals:					8.50		\$1,938.00		
Professional: Harinder K. Kapur									
803335012	11/3/25	CV-CCS:290	02668	Supervisory Review	0.25	\$228.00	\$57.00		11/30/25
Harinder K. Kapur Totals:					0.25		\$57.00		
Professional: Robert Tomlin White									
803262062	8/14/25	CV-CCS:290	02668	Pleading Preparation	4.50	\$228.00	\$1,026.00		8/31/25
803262107	8/27/25	CV-CCS:290	02668	Pleading Preparation	2.00	\$228.00	\$456.00		8/31/25
803262111	8/28/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		8/31/25
Robert Tomlin White Totals:					8.00		\$1,824.00		
2025 Totals:					16.75		\$3,819.00		
Fiscal Year: 2024									
Professional: Robert Tomlin White									
803158892	5/29/25	CV-CCS:290	02668	Case Evaluation/Assessment	2.00	\$228.00	\$456.00		5/31/25
803158902	5/30/25	CV-CCS:290	02668	Pleading Preparation	2.00	\$228.00	\$456.00		5/31/25
803171713	6/5/25	CV-CCS:290	02668	Pleading Preparation	1.25	\$228.00	\$285.00		6/30/25
803171735	6/6/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		6/30/25



Matter Time Activity By Professional Type

As of Dec 16, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
Robert Tomlin White Totals:					6.75		\$1,539.00		
2024 Totals:					6.75		\$1,539.00		
Attorney Totals:					23.50		\$5,358.00		



Matter Time Activity By Professional Type

As of Dec 16, 2025

Matter ID: SA2025801749					Date Opened: 05/28/2025				
Description: A & J Management Services LLC (ACC)									
Professional Type: Paralegal									
Fiscal Year: 2025									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803259864	9/2/25	CV-CCS:290	02668	Case Management	0.50	\$213.00	\$106.50		9/30/25
803383806	12/16/25	CV-CCS:290	02668	Contract/Document Preparation	2.25	\$213.00	\$479.25		
Helen Koh Totals:					2.75		\$585.75		
2025 Totals:					2.75		\$585.75		
Fiscal Year: 2024									
Professional: Helen Koh									
803152099	5/28/25	CV-CCS:290	02668	Case Management	1.25	\$213.00	\$266.25		5/31/25
803152197	5/29/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		5/31/25
Helen Koh Totals:					1.50		\$319.50		
2024 Totals:					1.50		\$319.50		
Paralegal Totals:					4.25		\$905.25		
SA2025801749 Totals:					27.75		\$6,263.25		

Exhibit 5

Investigative Report (DCC25-0002659-INV)



INVESTIGATION REPORT

Department of
Cannabis Control
CALIFORNIA



CASE INFORMATION

Case Number DCC24-0002659-INV	Date Received November 20, 2024
License Number C9-0000273-LIC	Legal Business Name of Licensee or Unlicensed Party A & J Management Services LLC
DBA E.G Organics	Premises Address 7700 Edgewater Drive, Suite 202, Oakland, CA 94621
Business Phone Number (510) 491-5885	Author's Name Isabel Sanchez
Date of Incident December 11, 2024	Location of Incident 7700 Edgewater Drive, Suite 202, Oakland, CA 94621

DESIGNATED RESPONSIBLE PARTY (OWNER) OR UNLICENSED PERSON(S)

Name (First, Middle, Last) Abdul Qayum	Title Owner Applicant
Address (include street, city, state, and zip code) 7700 Edgewater Drive, Suite 202, Oakland, CA 94621	
E-mail Address elevatedgroupabdul@gmail.com	Phone Number (510) 491-5885

Miscellaneous Information

Additional Owner:

Jacob Bonales, Officer – (510) 766-5989, elevatedgroupjacob@gmail.com

SUMMARY

On November 20, 2024, the Department notified A & J Management Services LLC (A & J) that A & J was in violation for conducting commercial cannabis activities without a valid Seller's Permit as required by Business and Professions Code section 26051.5, subdivision (a)(6). A & J is a licensed non-storefront retailer (C9-0000273-LIC) located at 7700 Edgewater Dr., Suite 202, Oakland, CA. 94621.

During my investigation, I discovered that A & J failed to provide the Department a current and active Seller's Permit. In addition, A & J failed to provide Department staff immediate access to inspect the licensed non-storefront retail premises and failed to notify the Department of their intent to sell or change ownership of A & J's license. Lastly, A & J continued to operate and engage in commercial cannabis activities with their revoked Seller's Permit



INVESTIGATION REPORT

BACKGROUND

A & J Management Services LLC possesses an annual license to engage in non-storefront retail commercial cannabis activities. The annual license expires August 28, 2025.

CASE NARRATIVE

On November 20, 2024, the Department sent a Notice to Comply via email to elevatedgroupabdul@gmail.com, the email address belonging to Abdul Qayum (Qayum), owner applicant (**Attachment A**) of A & J Management Services LLC (A & J), a fact I confirmed while searching the Department's licensing database. The Notice to Comply informed Qayum that A & J was in violation for conducting commercial cannabis activities without a valid Seller's Permit as required per Business and Professions Code section 26051.5, subdivision (a)(6). Furthermore, the Notice to Comply instructed Qayum to provide the Department proof that A & J had a current and active Seller's Permit, and to complete, sign, and return the Notice to Comply to the Department by November 30, 2024 (**Attachment B**). Prior to the Department's issuance of the Notice to Comply, the California Department of Tax and Fee Administration revoked A & J's Seller's Permit on September 3, 2024 (**Attachment C**), a fact I confirmed while exchanging email correspondence with CDTFA (indicated later in my investigation report, Attachment J).

On December 3, 2024, I emailed Qayum to follow up on the Notice to Comply since Qayum failed to provide the Department a current and active Seller's Permit for A & J on November 30, 2024 (**Attachment D**).

On December 11, 2024, I attempted to conduct a regulatory compliance inspection of A & J, along with DCC Special Investigator Bob Topping (Topping). I was unable to gain access to the licensed premises. I called Qayum at 510-491-5885, the phone number belonging to Qayum, a fact I confirmed while searching the Department's licensing database under A & J's contact information. (**Attachment A**). I made contact with Qayum and asked about gaining access to the premises. Qayum told me that there was no one available to provide access to the premises. Qayum and I spoke about the Notice to Comply that the Department previously emailed to him on November 20, 2024, and his failure to respond and provide the Department proof that A & J had an active and current Seller's Permit. I asked Qayum if A & J was still operating despite having a revoked Seller's Permit. Qayum told me that A & J was using AQ Logistics LLC's Seller's Permit to continue conducting commercial cannabis activities from the licensed premises.

On December 12, 2024, I received an email response from Qayum (**Attachment E**) which included Qayum's response to the aforementioned Notice to Comply (**Attachments F**) and a copy of AQ Logistics LLC's Seller's Permit (**Attachment G**). According to AQ Logistics LLC's Seller's Permit, AQ Logistics LLC is located at 6430 Preston Ave, Suite B, Livermore, CA 94551. I searched the Department's licensing database and confirmed that AQ Logistics LLC is not licensed to conduct commercial cannabis activities. Moreover, I continued searching the



INVESTIGATION REPORT

Department's licensing database and confirmed that A & J never notified the Department of their intent to sell A & J's license or change ownership to AQ Logistics LLC (**Attachment H**).

On December 17, 2024, I searched the METRC California Cannabis Track and Trace (track and trace) system. The track and trace system indicated that A & J has conducted approximately 584 sales of cannabis products from September 3, 2024, through December 17, 2024, despite having a revoked Seller's Permit (**Attachment I**).

On December 18, 2024, per CDTFA, AQ Logistics LLC is not listed as a licensed cannabis retailer (**Attachment J**).

On January 16, 2025, I met with Jolie Beckwith (Beckwith), Edgewater Park Plaza property manager. Beckwith stated that she served the Notice to Pay or Quit on November 18, 2024, by entering suite 202 and confirming A & J was non-operational and no longer present in the suite and conducting commercial cannabis activities. I was granted access to the premise by property management and took photos of what remained within the premise (**Attachment K**). I emailed Qayum requesting video surveillance for January 8, 2025, through January 9, 2025, as there were four manifests received (**Attachments L & M**). DCC Supervising Special Investigator Aric Engkabo emailed Beckwith requesting documents regarding A & J vacating its premises (**Attachment N**).

On January 17, 2025, I searched the METRC track and trace system. The track and trace system indicated that A & J has 265 packages in the inventory which consists of 217 units of edibles, 553 units of extract, 827 units of packaged flower, 142 units of other concentrate, 9 units of flower pre-rolls, 341 units of infused pre-rolls, 74 units of packaged shake, 81 units of tinctures, and 619 units of vape cartridges (**Attachment O**). A & J has accepted 5 out of 8 incoming transfers from December 17, 2024, through January 17, 2025 (**Attachment P**). A & J has also conducted approximately 198 sales from December 17, 2024, through January 15, 2025 (**Attachment Q**).

As of January 21, 2025, I did not receive the video surveillance that I requested on January 16, 2025.



INVESTIGATION REPORT

WITNESS LIST

Witness #1

- Name: Bob Topping
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (530) 205-6098
- E-mail: Bob.Topping@cannabis.ca.gov

Witness #2

- Name: Aric Engkabo
- Title/Position: Supervising Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (916) 298-7552
- E-mail: Aric.Engkabo@cannabis.ca.gov

Witness #3

- Name: Jolie Beckwith
- Title/Position: Edgewater Park Plaza Property Manager
- Address: 7700 Edgewater Drive, Oakland, CA 94621
- Phone: (510) 277-2064
- E-mail: jolie@rubiconpoint.com

PREPARER

Name	Title
Isabel Sanchez	Special Investigator
Signature	Date
<i>Isabel Sanchez</i>	May 20, 2025

REVIEWER

Name	Title
Aric Engkabo	Supervising Special Investigator
Signature	Date

LIST OF ATTACHMENTS

- A. Accela Contact Information
- B. Notice to Comply
- C. CDTFA Letter of Revocation
- D. Email to Licensee 12.3.24
- E. Email from Abdul Qayum 12.12.24
- F. Notice to Comply Table B Signed
- G. AQ Logistics Seller's Permit
- H. Accela Documents as of 12.12.24
- I. Delivery Sales 9.3.24-12.17.24
- J. Email from CDTFA 12.18.24
- K. Premise Photos 1.16.25
- L. Email Requesting Surveillance 1.16.25
- M. Incoming Transfers
- N. Supplemental Report A. Engkabo



INVESTIGATION REPORT

- O. Inventory 1.17.25
- P. Incoming Transfers 1.17.25
- Q. Sales 12.17.24 – 1.17.25

PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: A & J Management Services LLC
dba E.G. Organics
DCC Case No. DCC24-0002659-INV
License Number: C9-0000273-LIC, Retailer Non-Storefront

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Department of Cannabis Control, 2920 Kilgore Road, Rancho Cordova, CA 95670. On December 23, 2025, I served the within documents:

NOTICE OF DEFAULT DECISION AND ORDER

- ☒ VIA ELECTRONIC TRANSMISSION. Pursuant to CCP § 1010.6, I caused the document(s) to be sent to the person(s) at the Email address(es) listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☒ VIA CERTIFIED MAIL by placing the envelope for collection and mailing following our ordinary business practices for collecting and transmitting mail through the United States Postal Service to the individual(s) or entity(ies) listed below.
 - ☐ Service via certified mail to be completed upon the following business day.

A & J Management Services LLC
dba E.G. Organics
7700 Edgewater Drive, Ste. 202
Oakland, CA 94621
Certified Mail No. 7022 1670 0001 3411 4902
elevatedgroupabdul@gmail.com

Evelyn Schaeffer (email only)
Deputy Director
Compliance Division
Department of Cannabis Control
Evelyn.Schaeffer@cannabis.ca.gov

Abdul Qayum, Owner
A & J Management Services LLC
6150 Joaquin Murieta Ave., Apt. D
Newark, CA 94560
Certified Mail No. 7022 1670 0001 3411 4926
elevatedgroupabdul@gmail.com

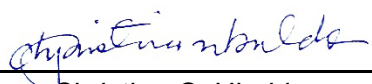
Gregory M. Cribbs (email only)
Supervising Deputy Attorney General
Cannabis Control Section
Office of Attorney General
Gregory.Cribbs@doj.ca.gov

Jacob Bonales, Owner
A & J Management Services LLC
2420 106th Ave.
Oakland, CA 94603
Certified Mail No. 7022 1670 0001 3411 4933
elevatedgroupjacob@gmail.com

I am familiar with the Department's business practices for collecting and transmitting mail through the United States Postal Service. In accordance with those practices, correspondence placed in the Department's internal mail collection system is, in the ordinary course of business, deposited in the United States Postal Service, with postage paid, on the same day.

I declare under penalty of perjury under the laws of the State of California, and the United States of America, that the above is true and correct.

Executed on December 23, 2025, at Rancho Cordova, California.


Christina C. Ubaldo