



Department of  
Cannabis Control  
CALIFORNIA

Gavin Newsom  
Governor

Nicole Elliott  
Director

December 29, 2025

VIA EMAIL ONLY

Social Market Inc  
David Doyle & Gene Brezeale, Owners

Christopher M. Glew, Esq.  
glewlaw@gmail.com

Re: Social Market Inc. - Case No. DCC25-0002246-INV  
Order Adopting Stipulated Settlement as Final Decision

Dear Messrs. Doyle, Brezeale, and Glew:

Pursuant to section 11415.60 of the Government Code, attached please find a copy of the Department of Cannabis Control's Order Adopting Stipulated Settlement as the Final Decision in the above-referenced matter involving Social Market Inc.

The Department's Order and Final Decision will be effective today, December 29, 2025. Pursuant to this Final Decision and its stipulated settlement, Social Market Inc has waived any right to reconsideration or appeal in this matter and to receive a copy of the Order and Final Decision via certified, registered, or first-class mail.

Sincerely,

Marc LeForestier  
General Counsel

Enclosure

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

11 In the Matter of the Accusation Against: ) CASE NO. DCC25-0002246-INV  
12 )  
12 **SOCIAL MARKET INC;** )  
13 **GENE BREZEALE, OWNER;** ) **ORDER ADOPTING STIPULATED**  
13 **DAVID DOYLE, OWNER** ) **SETTLEMENT AS FINAL DECISION**  
14 )  
14 3220 Pendleton Ave. )  
15 Santa Ana, CA 92704 )  
15 )  
16 Cannabis Distribution License )  
16 No. C11-0001883-LIC )  
17 )  
17 Respondent. )

18  
19 Pursuant to Government Code section 11415.60, the Department of Cannabis Control  
20 hereby adopts the attached Stipulated Settlement as its Final Decision in this matter.

21 This Order and Final Decision shall become effective on December 29, 2025.

22 IT IS SO ORDERED, December 29, 2025.

23  
24   
25 \_\_\_\_\_  
26 Marc LeForestier  
26 General Counsel  
27 FOR THE DEPARTMENT OF CANNABIS CONTROL  
28

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 State Bar No. 198769  
600 West Broadway, Suite 1800  
4 San Diego, CA 92101  
Telephone: (619) 738-9407  
5 Facsimile: (916) 732-7920  
E-mail: Harinder.Kapur@doj.ca.gov  
6 *Attorneys for Complainant*

7  
8 **BEFORE THE**  
9 **DEPARTMENT OF CANNABIS CONTROL**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 **SOCIAL MARKET INC**  
13 **GENE BREZEALE AND DAVID DOYLE,**  
14 **OWNERS**  
3220 Pendleton Ave., W  
Santa Ana, CA 92704

15 **Cannabis Distribution License**  
16 **No. C11-0001883-LIC**

17 Respondent.

Case No. DCC25-0002246-INV

**STIPULATED SETTLEMENT FOR  
REVOCATION OF LICENSE AND  
DISCIPLINARY ORDER**

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Evelyn Schaeffer (Complainant) is the Deputy Director of the Compliance Division  
22 of the Department of Cannabis Control (Department). She brought this action solely in her  
23 official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of  
24 California, by Harinder K. Kapur, Senior Assistant Attorney General.

25 2. Respondent Social Market Inc, (Respondent), and Gene Brezeale and David Doyle,  
26 Owners, are represented in this proceeding by attorney Christopher M. Glew, Esq., whose address  
27 is: Glew & Kim LLP, 1851 East First Street, Suite 840, Santa Ana, CA 92705. Respondent is  
28

1 acting in this proceeding through Gene Brezeala, and he has been designated and authorized by  
2 Respondent to enter into this agreement on its behalf (Authorized Representative).

3 3. On or about September 18, 2023, the Department issued Cannabis Distribution  
4 License No. C11-0001883-LIC to Respondent. The Cannabis Distribution License will expire on  
5 September 17, 2026, unless renewed.

### 6 **JURISDICTION**

7 4. Accusation No. DCC25-0002246-INV was filed before the Department, and is  
8 currently pending against Respondent. The Accusation and all other statutorily required  
9 documents were properly served on Respondent on November 17, 2025. Respondent timely filed  
10 its Notice of Defense contesting the Accusation.

11 5. A true and correct copy of Accusation No. DCC25-0002246-INV is attached as  
12 Exhibit A and incorporated herein by reference.

### 13 **ADVISEMENT AND WAIVERS**

14 6. Respondent through its Authorized Representative has carefully read, fully discussed  
15 with counsel, and understands the charges and allegations in Accusation No.  
16 DCC25-0002246-INV. Respondent through its Authorized Representative has also carefully  
17 read, fully discussed with counsel, and understands the effects of this Stipulated Settlement for  
18 Revocation of License and Disciplinary Order.

19 7. Respondent through its Authorized Representative is fully aware of its legal rights in  
20 this matter, including the right to a hearing on the charges and allegations in the Accusation; the  
21 right to confront and cross-examine the witnesses against it; the right to present evidence and  
22 testimony on its own behalf; the right to the issuance of subpoenas to compel the attendance of  
23 witnesses and the production of documents; the right to reconsideration and court review of an  
24 adverse decision; and all other rights accorded by the California Administrative Procedure Act  
25 and other applicable laws.

26 8. Respondent through its Authorized Representative fully aware of its legal rights to  
27 receive a copy of the Decision and Order via certified, registered, or first-class mail. Respondent  
28

1 through its Authorized Representative agrees to receive a copy of the Decision and Order in this  
2 matter via email at the following email addresses: glewlaw@gmail.com.

3 9. Respondent through its Authorized Representative voluntarily, knowingly, and  
4 intelligently waives and gives up each and every right set forth above.

### 5 **CULPABILITY**

6 10. Respondent through its Authorized Representative admits the truth of each and every  
7 charge and allegation in Accusation No. DCC25-0002246-INV.

8 11. Respondent through its Authorized Representative agrees that its Cannabis  
9 Distribution License is subject to discipline and it agrees to be bound by the Department's  
10 imposition of discipline as set forth in the Disciplinary Order below.

### 11 **CONTINGENCY**

12 12. This stipulation shall be subject to approval by the Department. Respondent through  
13 its Authorized Representative understands and agrees that counsel for Complainant and the staff  
14 of the Department may communicate directly with the Department regarding this stipulation and  
15 settlement, without notice to or participation by Respondent or its counsel. By signing the  
16 stipulation, Respondent through its Authorized Representative understands and agrees that it may  
17 not withdraw its agreement or seek to rescind the stipulation prior to the time the Department  
18 considers and acts upon it. If the Department fails to adopt this stipulation as its Decision and  
19 Order, the Stipulated Settlement for Revocation of License and Disciplinary Order shall be of no  
20 force or effect, except for this paragraph, it shall be inadmissible in any legal action between the  
21 parties, and the Department shall not be disqualified from further action by having considered this  
22 matter.

23 13. The parties understand and agree that Portable Document Format (PDF) and facsimile  
24 copies of this Stipulated Settlement for Revocation of License and Disciplinary Order, including  
25 PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

26 14. This Stipulated Settlement for Revocation of License and Disciplinary Order may be  
27 signed in any number of counterparts, each of which is an original and all of which taken together  
28 form one single document.

15. This Stipulated Settlement for Revocation of License and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement for Revocation of License and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

16. In consideration of the foregoing admissions and stipulations, the parties agree that the Department may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

## DISCIPLINARY ORDER

**1. WITHDRAWAL OF APPEAL.** Respondent's appeal of Accusation No. DCC25-0002246-INV and request for administrative hearing is deemed withdrawn and any further appeal is waived.

**2. LICENSE REVOCATION.** Respondent's Cannabis Distribution License No. C11-0001883-LIC is revoked as of the effective date of the Decision and Order. The revocation of Respondent's Cannabis Distribution License shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Department. Respondent shall lose all rights and privileges as a Cannabis Distributor in California as of the effective date of the Department's Decision and Order.

**3. PAYMENT OF FINES.** Respondent or Gene Brezeale, Owner, or David Doyle, Owner, shall be responsible for payment to the Department of an administrative fine in the amount of ten thousand (\$10,000.00) as against Cannabis Distribution License No. C11-0001883-LIC. Payment of the administrative fine will be automatically suspended until such time as either Respondent or Gene Brezeale, Owner, or David Doyle, Owner, applies for reinstatement of the revoked license or apply for a new commercial cannabis license or an ownership interest in a commercial cannabis license with the Department. Respondent or Gene

1 Brezeale, Owner, or David Doyle, Owner, shall pay to the Department the administrative fine  
2 within (15) days of applying for reinstatement of the license, or for a new commercial cannabis  
3 license, or for ownership interest in a commercial cannabis license with the Department.

4 **4. PAYMENT OF COSTS OF ENFORCEMENT.** If Respondent or Gene Brezeale,  
5 Owne, or David Doyle, Owner, apply for reinstatement of this license or apply for a new  
6 commercial cannabis license or new ownership interest in any commercial cannabis license  
7 Respondent or Gene Brezeale, Owner, or David Doyle, Owner, shall pay the Department's cost of  
8 enforcement for Case No. DCC25-0002246-INV, in the amount of eight thousand seven hundred  
9 forty-two dollars (\$8,742.00) prior to issuance of a new or reinstated license.

10 5. The above referenced payments, in the form of cashier's check, money order,  
11 personal or business check, shall be made as two separate payments and remitted by either of the  
12 following methods: (1) the Department of Cannabis Control's cash payment procedures; or (2)  
13 mailed to:

14 By U.S. Postal Service:  
Department of Cannabis Control  
Attn: Cashiers  
15 P.O. Box 419106  
Ranch Cordova, CA 95741-9106  
16

17 By FedEx or UPS:  
Department of Cannabis Control  
Attn: Cashiers  
18 2920 Kilgore Road  
19 Rancho Cordova, CA 95670-6157


20 6. Failure to complete the payments or comply with the above terms of this Order shall  
21 result in the denial of ownership interest and/or denial of any other license sought, as the  
22 Department deems appropriate. Failure to complete the payments or comply with the terms of  
23 this Order shall also result in enforcement of the Order as to either Respondent and/or the  
24 respective Designated Responsible Party or Owner in the Superior Court.

25 **ACCEPTANCE**

26 I have carefully read the above Stipulated Settlement for Revocation of License and  
27 Disciplinary Order and have fully discussed it with my attorney, Christopher M. Glew, Esq. I  
28 understand the stipulation and the effect it will have on my Cannabis Distribution License. I enter


1 into this Stipulated Settlement for Revocation of License and Disciplinary Order voluntarily.  
2 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department  
3 of Cannabis Control.

4  
5 DATED: 12/17/25

  
SOCIAL MARKETING  
GENE BREZEALE, Authorized Representative  
Respondent

8 I have read and fully discussed with Respondent Social Market Inc, and its Authorized  
9 Representative the terms and conditions and other matters contained in the above Stipulated  
10 Settlement for Revocation of License and Disciplinary Order. I approve its form and content.

11  
12 DATED: 12/17/25

  
CHRISTOPHER M. GLEW, ESQ.  
Attorney for Respondent

14  
15 **ENDORSEMENT**

16 The foregoing Stipulated Settlement for Revocation of License and Disciplinary Order is  
17 hereby respectfully submitted for consideration by the Department of Cannabis Control.

18  
19 DATED: \_\_\_\_\_

Respectfully submitted.

20 ROB BONTA  
Attorney General of California

21  
22 HARINDER K. KAPUR  
23 Senior Assistant Attorney General  
24 Attorneys for Complainant  
25  
26



1 into this Stipulated Settlement for Revocation of License and Disciplinary Order voluntarily,  
2 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department  
3 of Cannabis Control.

4  
5 DATED: \_\_\_\_\_

SOCIAL MARKET INC  
GENE BREZEALE, Authorized Representative  
*Respondent*

8 I have read and fully discussed with Respondent Social Market Inc, and its Authorized  
9 Representative the terms and conditions and other matters contained in the above Stipulated  
10 Settlement for Revocation of License and Disciplinary Order. I approve its form and content.

11  
12 DATED: \_\_\_\_\_

CHRISTOPHER M. GLEW, ESQ.  
*Attorney for Respondent*

14  
15 **ENDORSEMENT**

16 The foregoing Stipulated Settlement for Revocation of License and Disciplinary Order is  
17 hereby respectfully submitted for consideration by the Department of Cannabis Control.

18  
19 DATED: December 17, 2025

Respectfully submitted,

20 ROB BONTA  
Attorney General of California

21 *Harinder Kapur*

22 HARINDER K. KAPUR  
23 Senior Assistant Attorney General  
24 *Attorneys for Complainant*

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26  
27 LA2025803712  
CCS Stipulated Settlement and Disciplinary Order.docx

**Exhibit A**

**Accusation No. DCC25-0002246-INV**

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 State Bar No. 198769  
600 West Broadway, Suite 1800  
4 San Diego, CA 92101  
Telephone: (619) 738-9407  
5 Facsimile: (916) 732-7920  
E-mail: Harinder.Kapur@doj.ca.gov  
6 *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. DCC25-0002246-INV

12 **SOCIAL MARKET INC**  
13 **GENE BREZEALE AND DAVID DOYLE,**  
**OWNERS**  
14 **3220 Pendleton Ave., W**  
**Santa Ana, CA 92704**

**ACCUSATION**

15 **Cannabis Distribution License**  
16 **No. C11-0001883-LIC**

Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

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

23 2. On or about September 18, 2023, the Department issued Cannabis Distribution  
24 License C11-0001883-LIC to Social Market Inc (Respondent) with Gene Brezeale (Owner  
25 Brezeale) and David Doyle, Owners. The Cannabis Distribution License was in full force and  
26 effect at all times relevant to the charges brought herein and will expire on September 17, 2026,  
27 unless renewed.

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

3 ...

4 12. Section 26038 of the Code state in pertinent part:

5 (a) (1) A person engaging in commercial cannabis activity without a license as  
6 required by this division shall be subject to civil penalties of up to three times the amount of  
7 the license fee for each violation. Each day of operation shall constitute a separate violation  
8 of this section.

9 (2) (A) A person aiding and abetting unlicensed commercial cannabis activity shall be  
10 subject to civil penalties of up to three times the amount of the license fee for each  
11 violation, but in no case shall the penalty exceed thirty thousand dollars (\$30,000) for each  
12 violation. Each day of operation of unlicensed commercial cannabis activity that a person is  
13 found to have aided and abetted shall constitute a separate violation of this section.

14 (B) For the purposes of this section, in order to prove that a person aided and abetted  
15 an unlicensed cannabis activity, all of the following shall be demonstrated:

16 (i) The person was an owner, officer, controlling shareholder, or in a similar  
17 position of authority allowing them to make command or control decisions regarding  
18 the operations and management of the unlicensed cannabis activity or the property in  
19 which the activity is taking place.

20 (ii) The person had actual knowledge that the cannabis activity was unlicensed  
21 and that the cannabis activity required a license.

22 (iii) The person provided substantial assistance or encouragement to the  
23 unlicensed cannabis activity.

24 (iv) The person's conduct was a substantial factor in furthering the unlicensed  
25 cannabis activity.

26 13. Section 26053 of the Code, in pertinent part, states

27 (a) All commercial cannabis activity shall be conducted between licensees,  
28 except as otherwise provided in this division.

(b)(1) A person that holds a state testing laboratory license under this division is  
prohibited from licensure for any other activity, except testing, as authorized under  
this division. A person that holds a state testing laboratory license shall not employ an  
individual who is also employed by any other licensee that does not hold a state  
testing laboratory license.

...

(d) Each applicant or licensee shall apply for, and if approved, shall obtain, a  
separate license for each location where it engages in commercial cannabis activity.

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14. Section 26070 of the Code state:

...

(b) The department shall establish minimum security and transportation safety requirements for the commercial distribution and delivery of cannabis and cannabis products. Except as provided in subdivision (d) of Section 26110, the transportation of cannabis and cannabis products shall only be conducted by licensed persons authorized to engage in distribution under this division or employees of those persons. Transportation safety standards established by the department shall include, but not be limited to, minimum standards governing the types of vehicles in which cannabis and cannabis products may be distributed and delivered and minimum qualifications for persons eligible to operate such vehicles.

....

(e) Prior to transporting cannabis or cannabis products, a licensed distributor shall do both of the following:

(1) Complete an electronic shipping manifest as prescribed by the department. The shipping manifest shall include the unique identifier, pursuant to Section 26067, issued by the department for the cannabis product.

(2) Securely transmit the manifest to the department and the licensee that will receive the cannabis product.

(f) During transportation, the licensed distributor shall maintain a physical copy of the shipping manifest and make it available upon request to agents of the department and law enforcement officers.

(g) The licensee receiving the shipment shall maintain each electronic shipping manifest and shall make it available upon request to the department and any law enforcement officers.

(h) Upon receipt of the transported shipment, the licensee receiving the shipment shall submit to the department a record verifying receipt of the shipment and the details of the shipment.

(i) Transporting, or arranging for or facilitating the transport of, cannabis or cannabis products in violation of this chapter is grounds for disciplinary action against the license.

...

15. Section 26080 of the Code states:

(a) Except as provided in Chapter 25 (commencing with Section 26300), this division does not authorize or permit a licensee to transport or distribute, or cause to be transported or distributed, cannabis or cannabis products outside the state.

(b) A local jurisdiction shall not prevent transportation of cannabis or cannabis products on public roads by a licensee transporting cannabis or cannabis products in compliance with this division.

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**REGULATORY PROVISIONS**

16. Title 4 of the California Code of Regulations, section 15000.1, states:

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

(b) Commercial cannabis activity shall only be conducted between licensees. Licensed retailers and licensed microbusinesses authorized to engage in retail sales may conduct commercial cannabis activity with customers or nonprofits in accordance with this division.

(c) The licensee shall only conduct commercial cannabis activities authorized by the license and on the premises licensed for the activity.

(d) All transfers of cannabis and cannabis product shall be conducted by a licensed distributor.

(e) Licenses shall not be transferrable or assignable to another person or premises, except as provided in section 26050.2 of the Business and Professions Code. In the event of the sale or other transfer of the commercial cannabis business, changes in ownership shall be made in accordance with section 15023.

(f) Applicants and licensees shall use their legal business name on all documents related to commercial cannabis activity.

17. Title 4 of the California Code of Regulations, section 15042, states:

...

(f) A licensee shall not receive consideration or compensation for permitting an individual to enter the licensed premises.

18. Title 4 of the California Code of Regulations, section 15047.2, states:

(a) A licensee shall create and maintain an account within the track and trace system prior to engaging in any commercial cannabis activity.

(b) All commercial cannabis activity shall be accurately recorded in the track and trace system.

(c) A licensee is responsible for the accuracy and completeness of all data and information entered into the track and trace system. The licensee is responsible for all actions taken by the designated account manager or other account users while performing track and trace activities.

(d) A person shall not intentionally misrepresent or falsify information entered into the track and trace system.

19. Title 4 of the California Code of Regulations, section 15048.5, states:

(a) Harvested plants that are hanging, drying, or curing shall be assigned a unique harvest batch name, which shall be recorded in the track and trace system and placed within clear view of an individual standing next to the batch. The assigned harvest batch



name shall match what is in the track and trace system and the harvest batch name next to the batch shall be the same.

(b) Each harvest batch and manufactured cannabis batch shall be assigned a package tag and recorded in the track and trace system. For each harvest batch, the package tag shall be assigned and recorded in the track and trace system no later than the time at which any part of that harvest batch has finished undergoing any applicable drying, curing, grading, and trimming.

(c) For all cannabis and cannabis products held in a container, the package tag shall be affixed to the container holding the cannabis or cannabis products. If cannabis or cannabis products are held in multiple containers, the package tag shall be affixed to one of the containers and the other containers shall be labeled with the applicable UID number. Each unit within the container shall be labeled with the applicable UID number. All containers with the same UID number shall be placed contiguous to one another to facilitate identification by the Department.

20. Title 4 of the California Code of Regulations, section 15049, states:

(a) All cannabis and cannabis products on the licensed premises shall be assigned a plant or package tag, as applicable, except for harvested plants that are being dried, cured, graded, or trimmed, as specified in this division, and recorded in the track and trace system.

(b) Each of the following activities shall be recorded in the track and trace system within 24 hours of occurrence:

(1) Receipt of cannabis or cannabis products.

(2) Rejection of transferred cannabis or cannabis products.

(3) Manufacturing of cannabis or cannabis products.

(4) Use of cannabis or cannabis product for internal quality control testing or product research and development.

(5) Destruction or disposal of cannabis or cannabis products.

(6) Packaging or repackaging of cannabis or cannabis products, except that cultivation licensees shall comply with section 15049.1(b)(5).

(7) Laboratory testing, including testing results.

(8) Sale or donation of cannabis or cannabis products.

(c) The following information shall be recorded in the track and trace system for each activity entered pursuant to subsection (b):

(1) The type of cannabis or cannabis products.

(2) The weight, volume, or count of the cannabis or cannabis products.

(3) The date of activity.

(4) The UID assigned to the cannabis or cannabis products.

(5) The brand name of the cannabis goods.

(6) If cannabis or cannabis products are being destroyed or disposed of, the licensee shall record the following information in the notes section:

(A) The name of the employee performing the destruction or disposal;

(B) The reason for destruction or disposal; and

(C) The method of disposal.

(d) If a package adjustment is used to adjust the quantity of cannabis or cannabis products in the track and trace system, the licensee shall include a description explaining the reason for adjustment.

(e) If a licensee rejects a partial shipment of cannabis goods pursuant to section 15052.1(b), the licensee shall record the partial rejection in the track and trace system.

21. Title 4 of the California Code of Regulations, section 15049.1, states:

(a) The licensee shall record the following cultivation activities in the track and trace system within three (3) calendar days of occurrence:

(1) Planting of an immature lot;

(2) Moving immature plants to a designated canopy area, flowering of an individual plant, or application of a plant tag to an immature plant, in accordance with section 15048.4;

(3) Destruction or disposal of an immature or mature plant; and

(4) Harvesting of a mature plant, or portion thereof.

(b) The following information shall be reported in the track and trace system for each harvest batch:

(1) The wet weight of each harvest batch, which shall be obtained by the licensee immediately after harvest;

(2) The weight of cannabis waste associated with each harvested plant;

(3) The unique name of the harvest batch; and

(4) The initiating date of the harvest. For purposes of this section, the “initiating date” of the harvest is the month, day, and year the first mature cannabis plants in the harvest batch were cut, picked, or removed from the soil or other growing media.

(c) After the entire harvest batch has been dried, trimmed, cured, and packaged, the licensee shall indicate in the track and trace system that the harvest is finished.

///

1           22. Title 4 of the California Code of Regulations, section 15049.2, states, in part:

2           (a) A licensee shall prepare a shipping manifest through the track and trace  
3 system prior to transferring cannabis and cannabis products off of a licensed  
4 premises. The following information shall be recorded on the shipping manifest by  
5 the licensee initiating the transfer:

6           ...

7           (b) The distributor who transports the cannabis or cannabis product shall record  
8 the following additional information on the shipping manifest:

9           ...

10          (c) Upon pick-up or receipt of cannabis and cannabis products for transport,  
11 storage, or inventory, a licensee shall ensure that the cannabis or cannabis products  
12 received are as described in the shipping manifest. The licensee shall record  
13 acceptance or receipt, and acknowledgment of the cannabis or cannabis products in  
14 the track and trace system.

15          (d) If there are any discrepancies between type or quantity of cannabis or  
16 cannabis products specified in the shipping manifest and the type or quantity received  
17 by the licensee, the licensee shall reject the shipment.

18           23. Title 4 of the California Code of Regulations, section 15051, states:

19           (a) The license shall review the information recorded in the track and trace system at  
20 least once every 30 calendar days to ensure its accuracy, including, at a minimum:

21           (1) Reconciling on-hand inventory of cannabis and cannabis product with the records  
22 in the track and trace system; and

23           (2) Reviewing the licensee's authorized users and removing any users who are no  
24 longer authorized to enter information into the track and trace system.

25           (b) If a licensee finds a discrepancy between the on-hand inventory and the track and  
26 trace system, the licensee shall conduct an audit and notify the Department in writing if  
27 the discrepancy is significant as defined in section 15034.

28           24. Title 4 of the California Code of Regulations, section 15303, states:

          (a) A licensed distributor may package, repack, label, and relabel cannabis  
in the form of dried flower, including pre-rolls, for retail sale. All packages of  
cannabis in the form of dried flower, including pre-rolls, shall comply with the  
requirements in chapter 11.

          (b) A licensed distributor shall not process cannabis, but may roll pre-rolls that  
consist exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls shall  
be rolled, packaged, and labeled prior to regulatory compliance testing.

          (c) Licensed distributors may label and relabel a package containing  
manufactured cannabis or cannabis products with the amount of cannabinoids and  
terpenoids based on regulatory compliance testing results.

1 25. Title 4 of the California Code of Regulations, section 15309, states:

2 (a) A licensed distributor shall be able to account for all inventory and provide that  
3 information to the Department upon request.

4 (b) To account for inventory, a licensed distributor shall ensure all batches of  
5 cannabis or cannabis products are stored in accordance with section 15302 and shall be able  
6 to provide the Department with the status of the batch as follows:

7 (1) The batch is being held in storage for another licensee;

8 (2) The batch is awaiting sampling for regulatory compliance testing;

9 (3) The batch has been sampled and is awaiting regulatory compliance testing results;

10 (4) The batch has passed regulatory compliance testing;

11 (5) The batch has failed regulatory compliance testing and is awaiting approval for  
12 remediation;

13 (6) The batch has failed regulatory compliance testing and is awaiting destruction;  
14 and

15 (7) The batch is being stored or held for any other lawful purpose under the Act or  
16 this division.

17 26. Title 4 of the California Code of Regulations, section 15311, states:

18 The following requirements apply when transporting cannabis and cannabis products  
19 between licensees or licensed premises:

20 (a) Transportation shall only be conducted by persons holding a distributor  
21 license under the Act, or employees of those persons. All vehicles and trailers used  
22 for transportation shall be owned or leased, in accordance with the Vehicle Code, by  
23 the licensee. The licensee is not required to be the sole owner or lessor of the vehicle  
24 or trailer and all owners and lessors may use the vehicle for non-commercial cannabis  
25 activity.

26 (b) Prior to transporting any cannabis and cannabis products, the licensed  
27 distributor shall have a completed sales invoice or receipt that meets the requirements  
28 of Business and Professions Code section 26161. The licensed distributor shall only  
transport cannabis and cannabis products listed on the sales invoice or receipt. The  
sales invoice or receipt may not be altered or changed once transport begins.

...

(f) Cannabis and cannabis products shall only be transported inside of a vehicle  
or trailer and shall not be visible or identifiable from outside of the vehicle or trailer.

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1 27. Title 4 of the California Code of Regulations, section 15314, states:

2 (a) Prior to transporting cannabis or cannabis products, a licensed distributor shall  
3 generate a shipping manifest through the track and trace system for the following  
activities:

4 (1) Regulatory compliance testing and sampling;

5 (2) Sale of cannabis or cannabis products to a licensee;

6 (3) Destruction or disposal of cannabis or cannabis products; and

7 (4) Any other activity, as required pursuant to this division, or by the Department.

8 (b) The licensed distributor shall transmit the shipping manifest to the Department  
9 and the licensee that will receive the cannabis or cannabis products prior to transporting the  
cannabis or cannabis products.

10 (c) The licensed distributor shall ensure and verify that the cannabis or cannabis  
11 products being taken into possession for transport at the originating licensed premises  
are as described and accurately reflected in the shipping manifest. For purposes of this  
12 section, the licensed distributor may verify that the cannabis or cannabis products are  
accurately reflected in the shipping manifest by confirming that the number of boxes of  
13 cannabis or cannabis products, type of cannabis or cannabis products, weight and/or  
units of cannabis or cannabis products matches the label on the boxes containing the  
14 cannabis or cannabis products.

15 (1) The licensed distributor shall not take into possession or transport:

16 (A) Any cannabis or cannabis products that are not on the shipping manifest; or

17 (B) Any cannabis or cannabis products that are less than or greater than the  
amount reflected on the shipping manifest.

18 (2) The licensed distributor is responsible for any discrepancies between the shipping  
19 manifest and the cannabis or cannabis products in its possession during transport, and  
subject to any enforcement or disciplinary action related to such discrepancy.

20 (3) A licensed distributor shall not void or change a shipping manifest after departing  
21 from the originating licensed premises.

22 (d) A shipping manifest shall accompany every transport of cannabis or cannabis  
products.

23 28. Title 4 of the California Code of Regulations, section 17401, states:

24 (a) Cannabis products shall not be transferred to a licensed distributor, or  
25 microbusiness authorized to engage in distribution, for regulatory compliance testing unless  
the cannabis products are in their final form and packaged and labeled for retail sale.

26 (b) Notwithstanding subsection (a), a product label may exclude labeling of  
27 cannabinoid content if the cannabinoid content is to be added to the label at the distribution  
premises after issuance of a Certificate of Analysis in accordance with section 17407.

## **COST RECOVERY**

29. 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.

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**FACTUAL ALLEGATIONS**

30. On or about October 22, 2025, Department staff conducted an unannounced inspection at Respondent's licensed premises.

31. Department staff reviewed Respondent's California Cannabis Track and Track (CCTT) account which showed that Respondent's current inventory on the premises consisted of approximately 10,656 pounds of cannabis flower and leaf and approximately 3,000 cannabis pre-rolls. None of the cannabis or cannabis products in Respondent's inventory were recorded as having undergone regulatory compliance testing, and neither had Respondent entered a transfer of cannabis or cannabis product to a licensed cannabis testing laboratory in its CCTT account. The last recorded transfer of cannabis and cannabis products from Respondent's premises had occurred on October 14, 2025.

32. When Department staff arrived at Respondent's premises, Owner Brezeale opened the door and initially informed Department staff that there were customers inside and Department staff would need to return. Eventually, Department staff was given permission to enter Respondent's premises. Upon entering the premises, Department staff observed a black and white Range Rover leaving the premises through a roll-up door. Owner Brezeale stated that the other owner was leaving and would not be returning.

33. Respondent maintained cannabis and cannabis products in three storage areas: two caged areas and an open area referred to as "the loading bay." One of the caged areas contained cannabis flower stored in cardboard boxes and plastic totes. The other caged area contained plastic totes and individual "turkey bags" containing approximately one pound of cannabis each. In the loading bay there were numerous plastic totes containing cannabis flower packaged in similar one-pound bags.

34. Department staff reviewed Respondent's video surveillance that was date-stamped October 20, 2025. The video surveillance showed a white Toyota Tacoma enter the roll-up door of Respondent's premises timestamped at approximately 11:51 hours. The Toyota Tacoma parked in the loading bay and then an individual removed several boxes from the back of the Toyota Tacoma and placed them on a table before removing approximately 30 one-pound style

1 turkey bags of cannabis flower from the boxes. Then another individual placed three different  
2 one-pound style bags of cannabis flower in a separate box and the box was then placed in the  
3 Toyota Tacoma. The Toyota Tacoma departed Respondent's premises through the roll-up door.  
4 The approximately 30 bags remained at Respondent's premises. Department staff asked Owner  
5 Brezeale for the transfer manifest for the incoming and outgoing cannabis flower from the  
6 observed transfer. Owner Brezeale was unable to provide any documentation for the transfer.

7 35. Department staff reviewed the sign-in log kept by Respondent at the front entry desk.  
8 The sign-in log consisted of only the first names of individuals. There was no license name or  
9 number of the employer listed for the individuals signing in, and the reason for the visits were  
10 listed as "meeting", "research and development", "flower", or "shopping."

11 36. Department staff conducted an audit of the cannabis and cannabis products physically  
12 stored at Respondent's premises. During the audit, an unidentified employee entered the caged  
13 area which held cardboard boxes containing one-pound bags of cannabis flower. Department  
14 staff observed the employee removing paperwork from the boxes and placing the paperwork in  
15 the pocket of his sweatshirt. When asked to hand over the paperwork that had been removed, the  
16 employee denied having any paperwork. Department staff directed Owner Brezeale to have the  
17 employee return the paperwork. The employee who had taken the paperwork from the boxes  
18 returned and gave Owner Brezeale everything that he claimed he had removed from the boxes.  
19 The documents consisted of several Certificates of Analysis (COA) from "Food & Safety  
20 Analytical Lab" (not a licensed cannabis testing lab), and a copy of a packing slip for a shipment  
21 to an address in Charlotte, North Carolina.<sup>1 2</sup>

22 37. While auditing the cannabis products in Respondent's inventory, Department staff  
23 opened a box in the caged area, found that it contained cannabis flower and paperwork which  
24 included a United Parcel Service (UPS) packing slip that listed an address for delivery to a  
25 business in Charlotte, North Carolina. The box also contained a piece of paper which stated,  
26 "Attention UPS employees. This package does not contain marijuana. This is a UPS approved

27 <sup>1</sup> Cannabis is legal in North Carolina for a limited medicinal use for certain conditions.  
28 The adult-use of cannabis is not legal in North Carolina.

<sup>2</sup> The interstate sale and distribution of cannabis is illegal. See 21 U.S.C. § 801 et seq



low THC hemp shipment.” The paper had a printed signature designating the signer as Owner Brezeale and his contact information. Another piece of paper in the box appeared to be a California Department of Food and Agriculture license to purchase California farm products. Included in the box was a COA issued by Food & Environment Safety Analytical Lab. The COA results showed that the cannabis flower in the package contained 0.11% Delta 9-THC which would qualify it as hemp under federal law. When asked, Owner Brezeale stated that the cannabis flower in the box was transferred on a CCTT manifest from a Department-licensed cannabis cultivator, as well as several other licensed cannabis cultivators. Owner Brezeale did not state that the product in the box was hemp.

38. The cannabis flower in the cardboard boxes did not contain any CCTT unique identifier information (UID). Owner Brezeale was asked to identify the cannabis cultivators that produced the cannabis flower in each box and apply their name to the exterior so that Department staff could later trace the cannabis to a licensed source. Owner Brezeale and an unnamed employee proceeded to affix adhesive notes with the names of the licensed cannabis cultivators alleged as the source of the cannabis flower to the boxes.

39. Department staff opened another cardboard box that contained cannabis flower packaged in one-pound bags along with a packing slip which stated the order was to be delivered to a business in Houston, Texas.<sup>3</sup> Owner Brezeale stated that the cannabis flower in the box originated from licensed cannabis cultivators.

40. In another box, Department staff discovered bags of cannabis flower along with both empty and filled retail packaging which described the cannabis flower as hemp derived flower with low Delta 9-THC. Department staff discovered paperwork which consisted of packing slips that had recipients listed as “Indian Reservation” and an address in Ralston, Nebraska,<sup>4</sup> along with numerous additional COAs from a testing laboratory.

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<sup>3</sup> Cannabis is legal in Texas for a limited medicinal use. The adult-use of cannabis is not legal in Texas.

<sup>4</sup> Cannabis is legal in Nebraska for a limited medicinal use. The adult-use of cannabis is not legal in Nebraska.

1           41. Department staff located several boxes of unlabeled cannabis pre-rolls packaged in  
2 plastic tubes and a bag of unlabeled white powder which Owner Brezeale claimed was THC-A  
3 powder.<sup>5</sup> The cannabis pre-rolls and THC-A powder had no identifying information that would  
4 allow Department staff to verify the cannabis pre-rolls or THC-A powder were derived from a  
5 licensed source. As a distributor, Respondent should not have possessed bulk manufactured  
6 cannabis products such as THC-A powder.

7           42. The audit of Respondent's premises showed there were approximately 159 packages  
8 of cannabis and cannabis pre-rolls that were not labeled with CCTT UID labeling information,  
9 and that could not be sourced to a licensee or Respondent's premises. The total weight of the  
10 unsourced cannabis and cannabis pre-rolls located in Respondent's premises was approximately  
11 2,498 pounds.

12           43. Department staff found approximately 50 packages of cannabis flower with UID  
13 numbers which exceeded Respondent's physical inventory as recorded in its CCTT account. The  
14 total weight of the cannabis flower recorded in the CCTT system for the 50 packages found on  
15 the licensed premises was approximately 454 pounds. The total physical weight of all the  
16 packages labeled with the same 50 UID numbers found on the licensed premises during the  
17 inspection was 899 pounds, which is a weight surplus of 445 pounds in excess of the quantity  
18 documented in the licensee's CCTT account for those 50 UIDs.

19           44. Department staff also found approximately 106 packages where the weight of the  
20 physical cannabis inventory in Respondent's physical inventory was less than what was recorded  
21 in its CCTT account. The total weight recorded in the CCTT system for the 106 packages with a  
22 weight deficit was approximately 2,407 pounds. Department staff calculated approximately 911  
23 pounds of actual cannabis in the premises labeled with UIDs matching those 106 packages. The  
24 total difference of reported weight versus actual weight was a deficit of approximately 1,496  
25 pounds.

26           45. Department staff discovered approximately 384 packages of cannabis and cannabis  
27 products that were not located at Respondent's premises or could not be identified by a CCTT

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28           <sup>5</sup> THC-A powder, also known as THC-A crystalline, is a refined cannabis extract.

1 UID tag. Owner Brezeale was not able to identify those missing packages in the physical  
2 inventory stored Respondent's premises and could not account for their whereabouts. The total  
3 recorded weight of the missing cannabis product was approximately 7,032 pounds.

4 46. According to Respondent's CCTT account there should have been approximately  
5 10,656 pounds of physical cannabis in its licensed premises. After weighing the cannabis and  
6 cannabis products stored at Respondent's premises, Department staff determined that Respondent  
7 was missing approximately 6,348 pounds of physical inventory. The total weight of the physical  
8 cannabis located in the licensed premises, including the weight of cannabis that could not be  
9 sourced and the physical weight of cannabis packages that exceeded their weight reported in  
10 CCTT was approximately 4,308 pounds.

### 11 **FIRST CAUSE FOR DISCIPLINE**

12 (Conduct Cannabis Activity Between Licensee)

13 47. Respondent is subject to disciplinary action under Code sections 26030, subdivision  
14 (a), and 26053, subdivision (a), in that Respondent engaged in commercial cannabis activity with  
15 unlicensed businesses as more particularly alleged in paragraphs 31 through 46, above, which are  
16 hereby incorporated by reference and realleged as if fully set forth herein.

### 17 **SECOND CAUSE FOR DISCIPLINE**

18 (General Requirements: Distributors)

19 48. Respondent is further subject to disciplinary action under Code sections 26030,  
20 subdivisions (a) and (c), and 26070, subdivisions (b), (e), (f), (g), (h), and (i), and California Code  
21 of Regulations, title 4, sections 15000.1, subdivisions (b) and (d), and 15311, subdivisions (a),  
22 (b), and (f), in that Respondent failed to maintain the minimum requirements of a cannabis  
23 distribution licensee as more particularly alleged in paragraphs 31 through 46, above, which are  
24 hereby incorporated by reference and realleged as if fully set forth herein.

### 25 **THIRD CAUSE FOR DISCIPLINE**

26 (Transportation and Distribution of Cannabis Outside of the State)

27 49. Respondent is further subject to disciplinary action under Code sections 26030,  
28 subdivision (a), and 26080 in that Respondent transported or distributed, or caused to be

1 transported or distributed cannabis or cannabis products outside the state as more particularly  
2 alleged in paragraphs 36 through 40, above, which are hereby incorporated by reference and  
3 realleged as if fully set forth herein.

4 **FOURTH CAUSE FOR DISCIPLINE**

5 (Accurate Records)

6 50. Respondent is further subject to disciplinary action under Code section 26030,  
7 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15049.1, 15051,  
8 15309, and 15314, in that Respondent failed to maintain accurate records of its cannabis  
9 inventory in its California Cannabis Track and Trace account as more particularly alleged in  
10 paragraphs 31 through 46, above, which are hereby incorporated by reference and realleged as if  
11 fully set forth herein.

12 **FIFTH CAUSE FOR DISCIPLINE**

13 (General Requirements: Transfers of Cannabis)

14 51. Respondent is further subject to disciplinary action under Code section 26030,  
15 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15047.2, 15049,  
16 15049.2, and 15314, in that Respondent failed to properly record the receipt and transport of  
17 cannabis in the California Cannabis Track and Trace account as more particularly alleged in  
18 paragraphs 31 through 46, above, which are hereby incorporated by reference and realleged as if  
19 fully set forth herein.

20 **SIXTH CAUSE FOR DISCIPLINE**

21 (General Requirements: Tags and Inventory Accounting)

22 52. Respondent is further subject to disciplinary action under Code section 26030,  
23 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, 15048.5,  
24 and 15309 in that Respondent failed to properly label cannabis and cannabis pre-rolls with  
25 California Cannabis Track and Trace Unique Identifier tags as more particularly alleged in  
26 paragraphs 28, 42, 43, and 44, above, which are hereby incorporated by reference and realleged  
27 as if fully set forth herein.

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1 **SEVENTH CAUSE FOR DISCIPLINE**

2 (Premises Access Requirements)

3 53. Respondent is further subject to disciplinary action under Code section 26030,  
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15042, subdivision  
5 (e), in that Respondent failed to properly document the individuals accessing the licensed  
6 premises as more particularly alleged in paragraph 35, above, which are hereby incorporated by  
7 reference and realleged as if fully set forth herein.

8 **EIGHTH CAUSE FOR DISCIPLINE**

9 (Cannabis Products)

10 54. Respondent is further subject to disciplinary action under Code section 26030,  
11 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15303 and 17401,  
12 in that Respondent possessed bulk cannabis product which was not in its final form as more  
13 particularly alleged in paragraph 41, above, which are hereby incorporated by reference and  
14 realleged as if fully set forth herein.

15 **CAUSE FOR FINE**

16 55. Respondent is subject to civil fine under Code section 26038 for aiding and abetting  
17 illegal commercial cannabis activity as more particularly alleged in paragraphs 31 through 46,  
18 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

19 **PRAYER**

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

23 1. Revoking or suspending outright or suspending with terms and conditions or fining or  
24 any combination thereof, Cannabis Distribution License Number C11-0001883-LIC, issued to  
25 Respondent Social Market Inc with Gene Brezeale and David Doyle, Owners;

26 2. Ordering Respondent Social Market Inc with Gene Brezeale and David Doyle,  
27 Owners, to pay the Department of Cannabis Control the reasonable costs of the investigation and  
28 enforcement of this case, pursuant to Business and Professions Code section 26031.1;

3. Ordering the destruction of cannabis and cannabis goods in the possession of Social Market Inc with Gene Brezeale and David Doyle, Owners, at Respondent's expense, if revocation of Cannabis Distribution License Number C11-0001883-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

DATED: \_\_\_\_\_

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

LA2025803712

## PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: Social Market Inc  
DCC Case No. DCC25-0002246-INV  
License Number: C11-0001883-LIC, Commercial-Distributor

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 29, 2025, I served the within documents:

### ORDER ADOPTING STIPULATED SETTLEMENT AS FINAL DECISION

- ☒ 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.

Christopher M. Glew, Esq.  
Respondent's Attorney  
glewlaw@gmail.com

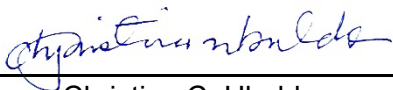
Evelyn Schaeffer  
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Compliance Division  
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Evelyn.Schaeffer@cannabis.ca.gov

Harinder K. Kapur  
Senior Assistant Attorney General  
Cannabis Control Section  
Office of Attorney General  
Harinder.Kapur@doj.ca.gov

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 29, 2025, at Rancho Cordova, California.

  
\_\_\_\_\_  
Christina C. Ubaldo