



Department of
Cannabis Control
CALIFORNIA

Gavin Newsom
Governor

Clint Kellum
Director

May 8, 2026

VIA EMAIL AND CERTIFIED MAIL

LACC, LLC
DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
Alfred Abramian, DRP/Owner
1316 S. Los Angeles St., Ste. B
Los Angeles, CA 90015
alfredthegood@gmail.com

Alfred Abramian, DRP/Owner
LACC, LLC
DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
10031 Mason Ave.
Chatsworth, CA 91311
alfredthegood@gmail.com

Vartan Karagezyan, Owner
LACC, LLC
DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
8010 Hollywood Way, #215
Sun Valley, CA 91352
vitokmed@gmail.com

Re: LACC, LLC DBA Weedyy and LA Cannabis Club; FBN CCG Delivery
Case No. DCC26-0000102-INV
Default Decision and Order

Dear Messrs. Abramian and Karagezyan:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent LACC, LLC DBA Weedyy and LA Cannabis Club in default and therefore will proceed as described in the attached Default Decision and Order.

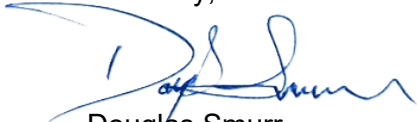
Be advised that Government Code section 11520, subdivision (c), provides that Respondent may serve a written motion requesting that the Decision be vacated upon stating the ground relied on within seven (7) days after service of the Decision. Respondent may address any written motion to the Department 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 timely motion, the attached Default Decision and Order involving LACC, LLC will become effective on June 8, 2026.

Sincerely,



Douglas Smurr
Assistant General Counsel

Enclosure

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In the Matter of the Accusation Against:

**LACC, LLC;
ALFRED ABRAMIAN, DRP/OWNER
1316 S. Los Angeles Street, Suite B
Los Angeles, CA 90015**

**Cannabis Retailer - Non-Storefront License
No. C9-0000683-LIC**

Respondent.

Case No. DCC26-0000102-INV

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about March 4, 2026, Complainant Evelyn Schaeffer, in her official capacity as the Deputy Director of the Compliance Division of the Department of Cannabis Control, filed Accusation No. DCC26-0000102-INV against LACC, LLC, with Alfred Abramian as Designated Responsible Party and Owner (Respondent) before the Department of Cannabis Control.

(Accusation is attached as Exhibit A.)

2. On or about January 6, 2023, the Department of Cannabis Control (Department) issued Cannabis Retailer - Non-Storefront License No. C9-0000683-LIC to Respondent. The Cannabis Retailer - Non-Storefront License was in full force and effect at all times relevant to the charges brought in Accusation No. DCC26-0000102-INV and will expire on January 6, 2027, unless renewed.

1 3. On or about March 5, 2026, Respondent was served by Certified and First Class Mail
2 copies of the Accusation No. DCC26-0000102-INV, Statement to Respondent, Notice of
3 Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5,
4 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of
5 Regulations, title 4, section 15002, is required to be reported and maintained with the
6 Department. Respondent's address of record was and is: 1316 S. Los Angeles Street, Suite B
7 Los Angeles, CA 90015.

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

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

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

16 6. The Department takes official notice of its records and the fact that Respondent failed
17 to file a Notice of Defense within 15 days after service upon them of the Accusation, and
18 therefore waived its right to a hearing on the merits of Accusation No. DCC26-0000102-INV.

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

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

24 8. Pursuant to its authority under Government Code section 11520, the Department finds
25 Respondent is in default. The Department will take action without further hearing and, based on
26 the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this
27 matter, finds that the charges and allegations in Accusation No. DCC26-0000102-INV, are
28 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
\$20,750.57 as of April 20, 2026.

DETERMINATION OF ISSUES

1
2 1. Based on the foregoing findings of fact, Respondent LACC, LLC with Alfred
3 Abramian as Designated Responsible Party and Owner has subjected its Cannabis Retailer - Non-
4 Storefront License No. C9-0000683-LIC to discipline.

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

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

10 a. Violation of Business and Professions Code section 26030, subdivisions (a) and
11 (c), and California Code of Regulations, title 4, sections 15000.1 subdivision (c), and
12 15000.7, subdivision (a) [Conducting commercial cannabis activities beyond the
13 premises licensed for the activity and failed to store all cannabis and cannabis
14 products solely within the licensed premises.]

15 b. Violation of Business and Professions Code section 26030, subdivisions (a) and
16 (c), and California Code of Regulations, title 4, sections 15000.1 subdivision (c), and
17 15414, subdivisions (a) and (d) [Conducting conducted commercial cannabis
18 activities beyond what was authorized by the license.]

19 c. Violation of Business and Professions Code section 26030, subdivisions (a) and
20 (c), and California Code of Regulations, title 4, sections 15047.2, subdivisions (b)
21 and (d), 15049, subdivisions (b)(1) and (b)(8), and 15049.3, subdivisions (a) through
22 (c) [Failure to comply with CCTT Reporting requirements.]

23 d. Violation of Business and Professions Code section 26030, subdivisions (a)
24 and (c), and California Code of Regulations, title 4, sections 15048.1, subdivision
25 (a)(8), 15051, subdivision (a)(1), 15423, and 15424, subdivisions (a) through (c)
26 [Failure to comply with cannabis inventory reconciliation requirements.]

- 1 e. Violation of Business and Professions Code section 26030, subdivisions (a)
2 and (c), and California Code of Regulations, title 4, section 15415 [Failure to provide
3 evidence of compliance with delivery employee requirements.]
- 4 f. Violation of Business and Professions Code section 26030, subdivisions (a) and
5 (c), and California Code of Regulations, title 4, section 15415.1, subdivision
6 (b)(3) [Failure to ensure that a third-party technology service provider did not use the
7 Licensee's license number.]
- 8 g. Violation of Business and Professions Code section 26030, subdivisions (a) and
9 (c), and California Code of Regulations, title 4, section 15416, subdivision (a)
10 [Failure to ensure deliveries were only made to physical addresses.]
- 11 h. Violation of Business and Professions Code section 26030, subdivisions (a) and
12 (c), and California Code of Regulations, title 4, section 15417, subdivision (d)
13 [Failure to outfit its delivery vehicle with a dedicated Global Positioning System
14 (GPS) device that recorded a history of all locations traveled to by the delivery
15 employee while engaged in delivery.]
- 16 i. Violation of Business and Professions Code section 26030, subdivisions (a) and
17 (c), and California Code of Regulations, title 4, sections 15418, subdivisions (d)
18 through (f), and 15420 [Failure to ensure that delivery employees had a delivery
19 inventory ledger before leaving the licensed premises, maintained a log of all stops,
20 received a delivery request receipt prior to arrival at any delivery location, and
21 prepared delivery request receipts for each delivery of cannabis goods.]
- 22 j. Violation of Business and Professions Code sections 26030, subdivisions (a)
23 and (c), and California Code of Regulations, title 4, section 17800, subdivision (b)
24 [Failure to cooperate with, and participate in, a Department investigation against the
25 Licenses.]
- 26 k. Violation of Business and Professions Code sections 26030, subdivision (f)
27 [Conducting commercial cannabis deliveries in the City of Ventura without local
28 authorization.]

Exhibit A

Accusation

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**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10
11 In the Matter of the Accusation Against:

Case No. DCC26-0000102-INV

12 **LACC, LLC dba CCG DELIVERY;**
13 **ALFRED ABRAMIAN, DRP/OWNER**
14 **1316 S. Los Angeles Street, Suite B**
15 **Los Angeles, CA 90015**

ACCUSATION

16 **Cannabis - Retailer Non-Storefront License**
17 **No. C9-0000683-LIC**

Respondent.

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. On or about January 6, 2023, the Department issued Cannabis - Retailer Non-
23 Storefront License C9-0000683-LIC to LACC, LLC (Respondent) with Alfred Abramian,
24 Designated Responsible Party and Owner (Owner Abramian). The Cannabis Retailer Non-
25 Storefront License was in full force and effect at all times relevant to the charges brought herein
26 and will expire on January 6, 2027, unless renewed.

27 ///

28 ///

1 **PROCEDURAL HISTORY**

2 3. The Department issued an Emergency Decision and Order (EDO), pursuant to
3 California Code of Regulations, title 4, section 17815, that was served on Respondent on
4 February 23, 2026, and was effective the same day at 5:00 p.m. The EDO suspended
5 Respondent’s retailer non-storefront license and ordered Respondent to cease all commercial
6 cannabis activity. The time to initiate adjudicative proceedings is within 10 days after the
7 issuance or effective date of the EDO, or in this case by or on March 5, 2026.

8 **JURISDICTION**

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

12 5. Section 26010 of the Code states:

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

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

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

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

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

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

23 The department shall make and prescribe reasonable rules and regulations as
24 may be necessary to implement, administer, and enforce its duties under this division
25 in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of
26 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.

27 ///

28 ///

1 9. Section 26031 of the Code states:

2 (a) The department may suspend, revoke, place on probation with terms and
3 conditions, or otherwise discipline licenses issued by the department and fine a
4 licensee, after proper notice and hearing to the licensee, except as provided in Section
5 26031.01, if the licensee is found to have committed any of the acts or omissions
6 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.

7 (b) The department may suspend or revoke a license when a local agency has
8 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.

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

12 (d) The suspension or expiration of a license issued by the department, or its
13 suspension, forfeiture, or cancellation by order of the department or by order of a
court of law, or its surrender without the written consent of the department, shall not,
14 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
15 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
16 licensee on any such ground.

17 10. Section 26034 of the Code states:

18 All accusations against licensees shall be filed by the department within five
19 years after the performance of the act or omission alleged as the ground for
disciplinary action; provided, however, that the foregoing provision shall not
20 constitute a defense to an accusation alleging fraud or misrepresentation as a ground
for disciplinary action. The cause for disciplinary action in that case shall not be
21 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
22 five years after that discovery.

23 **STATUTORY PROVISIONS**

24 11. Section 26030 of the Code states:

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

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

28 ...

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

3 ...

4 (f) Failure to comply with the requirement of a local ordinance regulating
5 commercial cannabis activity....

6 **REGULATORY PROVISIONS**

7 12. Title 4 of the California Code of Regulations, section 15000.1, subdivision (c), states:

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

10 13. Title 4 of the California Code of Regulations, section 15000.7, subdivision (a), states:

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

13 14. Title 4 of the California Code of Regulations, section 15023, subdivision (c), states:

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

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

...

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

...

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

...

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

1 16. Title 4 of the California Code of Regulations, section 15048.1, subdivision (a)(8),
2 states:

3 (a) A licensee and their designated account manager(s) shall:

4 ...
5 (8) Reconcile the inventory of cannabis and cannabis products on the licensed
6 premises with the track and trace system database at least once every thirty (30)
7 calendar days.

8 17. Title 4 of the California Code of Regulations, section 15049, states, in pertinent part:

9 ...

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

12 (1) Receipt of cannabis or cannabis products.

13 ...

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

15 18. Title 4 of the California Code of Regulations, section 15049.3, states:

16 (a) A licensed retailer conducting delivery of cannabis goods shall create a
17 delivery inventory ledger in the track and trace system and record the information
18 required under subsections (b)(1) through (7) prior to the delivery employee leaving
19 the licensed retail premises for each delivery trip. A delivery trip begins when the
20 delivery employee leaves the licensed retail premises to conduct delivery of cannabis
21 goods.

22 (b) The delivery inventory ledger shall include the following information:

23 (1) The delivery inventory ledger number generated by the track and trace
24 system and assigned to the specific delivery trip.

25 (2) The name and license number of the licensed retailer.

26 (3) The delivery employee's name, employee ID, and driver's license number.

27 (4) The delivery vehicle's make, model, and license plate number.

28 (5) The item name and category of each cannabis good to be carried on the
delivery trip, the UID(s) assigned to those cannabis goods, and the number of units
associated with each UID on the delivery inventory ledger.

(6) The UID(s) of any cannabis goods ordered by customers and processed by
the licensed retailer prior to the delivery employee leaving the licensed retail
premises.

(7) The date and time the delivery employee begins the delivery trip.

1 (c) For each delivery of cannabis goods, the following information shall be
2 recorded within the track and trace system by the end of the calendar day on which
the delivery was completed:

3 (1) The date and time the delivery was completed. A delivery is completed at
4 the time the cannabis goods are physically provided to the customer.

5 (2) Whether the customer is an adult-use customer, medicinal cannabis patient,
or patient's primary caregiver.

6 (3) The UID and quantity of each cannabis good delivered.

7 (4) The purchase price of each cannabis good delivered.

8 (5) The city, county, and zip code in which the delivery was completed.

9 19. Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1),
10 states:

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

13 (1) Reconciling on-hand inventory of cannabis and cannabis product with the
14 records in the track and trace system...

15 20. Title 4 of the California Code of Regulations, section 15414, subdivision (a), states:

16 (a) A non-storefront retailer licensee shall be authorized to conduct retail sales
17 exclusively by delivery as defined in Business and Professions Code section
26001(o).

18 21. Title 4 of the California Code of Regulations, section 15415, states:

19 (a) All deliveries of cannabis goods shall be performed by a delivery employee
20 who is directly employed by a licensed retailer.

21 (b) Each delivery employee of a licensed retailer shall be at least 21 years of
age.

22 (c) All deliveries of cannabis goods shall be made in person. A delivery of
23 cannabis goods shall not be made through the use of an unstaffed vehicle.

24 (d) Deliveries of cannabis goods shall be received by customers only during the
hours of operation established by section 15403. Delivery employees shall return to
25 the licensed premises after making their last delivery of the day if they have any
unsold cannabis goods to return to the premises.

26 (e) During the process of delivery, the licensed retailer's delivery employee may
27 not engage in any activities except for cannabis goods delivery and necessary rest,
fuel, or vehicle repair stops.

28 (f) A delivery employee of a licensed retailer shall, during deliveries, carry a

1 copy of the retailer's current license, a copy of the QR Code certificate issued by the
2 Department, which complies with section 15039, subsection (d), the employee's
3 government-issued identification, and an identification badge provided by the
4 employer pursuant to section 15043. A delivery employee shall provide a copy of the
5 retail license, a copy of the QR Code certificate, and their employee identification
6 badge to a delivery customer upon request.

7 (g) Prior to providing cannabis goods to a delivery customer, a delivery
8 employee shall confirm the identity and age of the delivery customer as required by
9 section 15404 and ensure that all cannabis goods sold comply with requirements of
10 section 15413.

11 (h) A licensed retailer shall maintain an accurate list of the retailer's delivery
12 employees and shall provide the list to the Department upon request.

13 22. Title 4 of the California Code of Regulations, section 15415.1, subdivision (b)(3),
14 states:

15 ...

16 (b) Notwithstanding subsection (a) of this section, a licensed retailer or licensed
17 microbusiness may contract with a service that provides a technology platform to
18 facilitate the sale and delivery of cannabis goods, in accordance with all of the
19 following:

20 ...

21 (3) The licensed retailer or licensed microbusiness shall not advertise or market
22 cannabis goods in conjunction with the technology platform service provider, outside
23 of the technology platform, and shall ensure that the technology platform service
24 provider does not use the licensed retailer's or licensed microbusiness's license
25 number or legal business name on any advertisement or marketing that primarily
26 promotes the services of the technology platform....

27 23. Title 4 of the California Code of Regulations, section 15416, subdivision (a), states:

28 (a) A delivery employee may only deliver cannabis goods to a physical address
in California.

29 24. Title 4 of the California Code of Regulations, section 15417, subdivision (d), states:

30 ...

31 (d) A vehicle used for the delivery of cannabis goods shall be outfitted with a
32 dedicated Global Positioning System (GPS) device for identifying the geographic
33 location of the delivery vehicle and recording a history of all locations traveled to by
34 the delivery employee while engaged in delivery. A dedicated GPS device must be
35 owned by the licensee and used for delivery only. The device shall be either
36 permanently or temporarily affixed to the delivery vehicle and shall remain active and
37 inside of the delivery vehicle at all times during delivery. At all times, the licensed
38 retailer shall be able to identify the geographic location of all delivery vehicles that
are making deliveries for the licensed retailer and document the history of all

1 locations traveled to by a delivery employee while engaged in delivery. A licensed
2 retailer shall provide this information to the Department upon request. The history of
3 all locations traveled to by a delivery employee while engaging in delivery shall be
4 maintained by the licensee for a minimum of 90 days....

5
6 25. Title 4 of the California Code of Regulations, section 15418, states, in pertinent part:

7 ...

8 (d) Before leaving the licensed premises, the licensed retailer's delivery
9 employee must have a delivery inventory ledger of all cannabis goods provided to the
10 licensed retailer's delivery employee. The contents of the delivery inventory ledger
11 must comply with the requirements of section 15049.3. During the delivery trip, as
12 defined in section 15049.3, the delivery employee shall maintain the delivery
13 inventory ledger in hard copy or electronically, the latter of which may be an
14 electronic copy maintained in the track and trace system. The delivery inventory
15 ledger must be updated after each completed delivery to reflect the remaining
16 inventory carried by the delivery employee. The delivery inventory ledger must
17 otherwise be updated in accordance with the requirements of section 15049.3, and
18 then entered into the track and trace system no later than the end of the calendar day
19 on which the delivery trip occurred.

20 (e) The licensed retailer's delivery employee shall maintain a log that includes
21 all stops from the time the licensed retailer's delivery employee leaves the licensed
22 premises to the time that the licensed retailer's delivery employee returns to the
23 licensed premises, and the reason for each stop. The log shall be turned in to the
24 licensed retailer when the licensed retailer's delivery employee returns to the licensed
25 premises. The licensed retailer must maintain the log as a commercial cannabis
26 activity record as required by this division. The log may be maintained electronically.

27 (f) Prior to arrival at any delivery location, the licensed retailer must have
28 received a delivery request from the customer and provided the delivery request
receipt to the licensed retailer's delivery employee electronically or in hard copy. The
delivery request receipt provided to the licensed retailer's delivery employee shall
contain all of the information required in section 15420, except for the date and time
the delivery was made, and the signature of the customer.

29 26. Title 4 of the California Code of Regulations, section 15420, states:

30 (a) The delivery request receipt shall contain the following:

31 (1) The legal business name and license number of the licensed retailer;

32 (2) The first name and employee number of the licensed retailer's delivery
33 employee who delivered the order;

34 (3) The first name and employee number of the licensed retailer's employee
35 who prepared the order for delivery;

36 (4) The first name of the customer and a licensed retailer-assigned customer
37 number for the person who requested the delivery;

38 (5) The date and time the delivery request was made;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(6) The delivery address;

(7) A detailed description of all cannabis goods requested for delivery. The description shall include the weight, volume, or any other accurate measure of the amount of all cannabis goods requested;

(8) The total amount paid for the delivery, including any taxes or fees, the cost of the cannabis goods, and any other charges related to the delivery; and

(9) Upon delivery, the date and time the delivery was made, and the handwritten or electronic signature of the customer who received the delivery.

(b) At the time of the delivery, the delivery employee of the retailer shall provide the customer who placed the order with a hard or electronic copy of the delivery request receipt. The delivery employee shall retain a hard or electronic copy of the signed delivery request receipt for the licensed retailer's records.

(c) For the purposes of this section, an employee number is a distinct number assigned by a licensed retailer to an employee that would allow the licensed retailer to identify the employee in documents or records using the employee number rather than the employee's full name. A licensed retailer shall be able to identify the employee associated with each employee number upon request from the Department.

(d) For the purposes of this section, a customer number is a distinct number assigned by a licensed retailer to a customer that would allow the licensed retailer to identify the customer in documents or records using the customer number rather than the customer's full name. A licensed retailer shall be able to identify the customer associated with each customer number upon request from the Department.

27. Title 4 of the California Code of Regulations, section 15423, states:

A licensed retailer shall maintain an accurate record of its inventory. A licensed retailer shall provide the Department with the record of inventory immediately upon request. A licensed retailer shall keep a record of the following information for all cannabis goods the licensed retailer has in its inventory:

(a) A description of each item such that the cannabis goods can easily be identified;

(b) An accurate measurement of the quantity of the item;

(c) The date and time the cannabis goods were received by the licensed retailer;

(d) The sell-by or expiration date provided on the package of cannabis goods, if any;

(e) The name and license number of the licensed distributor or licensed microbusiness that transported the cannabis goods to the licensed retailer; and

(f) The price the licensed retailer paid for the cannabis goods, including taxes, delivery costs, and any other costs.

///

1 28. Title 4 of the California Code of Regulations, section 15424, states, in pertinent part:

2 (a) A licensed retailer shall be able to account for all of its inventory.

3 (b) In conducting an inventory reconciliation, a licensed retailer shall verify that
4 the licensed retailer's physical inventory is consistent with the licensed retailer's
records pertaining to inventory.

5 (c) The result of inventory reconciliation shall be retained in the licensed
6 retailer's records and shall be made available to the Department upon request....

7 29. Title 4 of the California Code of Regulations, section 17800, subdivision (b), states:

8 ...

9 (b) Failure to cooperate with and participate in any Department investigation
10 pending against the licensee may result in a licensing violation subject to discipline.
This subsection shall not be construed to deprive a licensee of any privilege
11 guaranteed by the Fifth Amendment to the Constitution of the United States, or any
other constitutional or statutory privileges. This subsection shall not be construed to
12 require a licensee to cooperate with a request that would require the licensee to waive
any constitutional or statutory privilege or to comply with a request for information or
13 other matters within an unreasonable period of time in light of the time constraints of
the licensee's business. Any constitutional or statutory privilege exercised by the
14 licensee shall not be used against the licensee in a regulatory or disciplinary
proceeding against the licensee....

15 **COST RECOVERY**

16 30. Section 26031.1 of the Code states:

17 (a) Except as otherwise provided by law, in an order issued in resolution of a
18 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
19 exceed the reasonable costs of the investigation and enforcement of the case.

20 (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
21 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
22 enforcement costs up to the date of the hearing, including, but not limited to, charges
imposed by the Attorney General.

23 (c) The administrative law judge shall make a proposed finding of the amount
24 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
25 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
26 law judge if the proposed decision fails to make a finding on costs requested pursuant
to subdivision (a).

27 ///

28 ///

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

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

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

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

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

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

21 **FACTUAL ALLEGATIONS**

22 31. On January 27, 2026, Department staff conducted an unannounced compliance
23 inspection at Respondent's licensed premises, located at 1316 S. Los Angeles Street, Suite B, Los
24 Angeles, California, 90015 (licensed premises). Upon arrival, Department staff called
25 Respondent's owners,¹ who did not answer the call(s). Department staff left a voicemail message
26 for Owner Abramian, but could not do so for Owner Karagezyan, whose voicemail mailbox was
27 full. Department staff then called the business number for Respondent, which had a prerecorded
28 message system, and left a voicemail message.

32. Shortly after leaving a voicemail message, Department staff received a call back from
an individual who identified himself as "W.J.R.," and who explained that Owner Abramian
forwarded to him the Department staff's message, and that he was the new "owner" of the license

¹ Owners, as defined by Business and Professions Code section 26001, subdivision (av), associated with Respondent are Alfred Abramian (Owner Abramian) and Vartan Karagezyan (Owner Karageyan).

1 and there were no employees at the licensed premises at that time. W.J.R. agreed to meet
2 Department staff at the licensed premises.

3 33. While waiting for W.J.R. to arrive, Department staff reviewed the Department's
4 licensing system but found no official notification from Respondent (DCC Form-027) listing
5 W.J.R. as an owner of Respondent. Instead, Owner Abramian submitted a Fictitious Business
6 Name (FBN) change, including 35 additional Doing Business As (DBA) names. In response to
7 that submission, the Department advised Owner Abramian that a license could only have one
8 DBA, but could have multiple FBNs. In response, Owner Abramian stated that he wanted to
9 update Respondent's DBA to "Weedyy" and with "CCG Delivery" as the only additional FBN.
10 Department staff conducted an online search for the name Weedyy and discovered a website for
11 cannabis delivery in the Los Angeles area. The Weedyy website listed hyperlinks to multiple
12 dispensary names, including several of Respondent's purported DBAs such as "Kushfly," "Juana
13 Shoppe," and "Queen B'z Delivery," which when clicked, directed Department staff to the
14 businesses' corresponding websites. Department staff discovered that Respondent's license
15 number, C9-0000683-LIC, was also displayed on the linked websites. Each website was
16 advertising cannabis goods that were not recorded in Respondent's California Cannabis Track
17 and Trace (CCTT) account.

18 34. While further searching the Department's licensing records, Department staff
19 discovered a notice from the City of Ventura Code Enforcement had been issued to Respondent
20 on May 20, 2025, which stated that Respondent was in violation of conducting cannabis
21 deliveries in the City of Ventura without local authorization.

22 35. Department staff searched Respondent's CCTT account and discovered that
23 Respondent had not created any retail ledgers or delivery sales manifests since 2024, but between
24 January 8, 2026, and January 26, 2026, Respondent had recorded 75 separate in-person sales
25 receipts, comprised of 273 individual items, for a recorded sales total of \$4,702.41. Department
26 staff further discovered that in 2025, Respondent received 36 incoming transfers of cannabis
27 goods comprised of 394 distinct UUIDs (Unique Identifiers) for a total of 5,431 units, equaling
28 \$38,427.77. However, per Respondent's CCTT account, Respondent only reported one in-person

1 sale in 2025, which occurred on March 5, 2025, for a total of \$11.00. For 2026, Department staff
2 discovered that between January 5, 2026, and January 26, 2026, Respondent received 11
3 incoming transfers, comprised of 140 distinct Unique Identifier tags (UIDs) totaling 2,578 units,
4 and recorded a wholesale price totaling \$13,616.31. A non-storefront retailer like Respondent
5 may not make in-person sales and may only make delivery sales to physical addresses.

6 36. After continued review of Respondent's CCTT account, Department staff determined
7 that Respondent had 555 active packages reported in its inventory, meaning there were 555
8 distinct UIDs that were not finished nor discontinued, and had a quantity of over 0. This equaled
9 a total of 7,736 individual units in Respondent's CCTT inventory that should have been present
10 on the licensed premises.

11 37. Once W.J.R. arrived at the licensed premises, Department staff were escorted inside,
12 they immediately discovered that the only on-site inventory comprised of 20 cannabis vape
13 cartridges, which had UID tags correlating with incoming manifest transfer number ending in 318
14 (UID 318), and which was received 4 days earlier, on January 23, 2026. Department staff could
15 not locate the remaining, and missing, 7,716 units of cannabis and cannabis products at the
16 licensed premises. When Department staff asked W.J.R. where the missing cannabis goods were
17 located, he replied that "they all had been sold." When asked where the sales had been recorded,
18 W.J.R. replied that he believed that the point-of-sale system was not recording sales. When
19 Department staff questioned W.J.R. about the inconsistency, as they had reviewed Respondent's
20 CCTT account and discovered that there were approximately 75 sales recorded in January 2026,
21 W.J.R. replied that they did have recorded sales recorded, because they had a small number of
22 customers who were still placing orders. Department staff then asked W.J.R. if he had access to
23 Respondent's CCTT account and he replied that he did not have his own account. In addition to
24 the previously identified 20 vape cartridges, Department staff discovered a stack of UID 318 tags
25 that were listed on manifest 0010187318, but did not have associated cannabis goods with them.
26 When Department staff inquired why, W.J.R. replied that "they had been given away as samples
27 to customers." Department staff then asked if those customers had been charged for the samples,
28

1 and W.J.R. replied that the customers were charged 1 cent, but he was unable to provide any
2 receipts showing those charges had been recorded.

3 38. When Department staff asked W.J. R. to show them video of delivery drivers packing
4 up deliveries, he was unable to find any footage of drivers packing orders as requested, but stated
5 he could find them if he had more time.

6 39. Department staff then asked W.J.R. where the money from the deliveries was located,
7 and he initially replied that it “was deposited in the bank.” When Department staff further
8 inquired that some of the sales recorded had occurred at 9:11 p.m. and 9:12 p.m. the evening
9 prior, W.J.R. then changed his reply and stated that “the driver still had the money.” W.J.R. also
10 stated that the delivery driver also still had the “driver kit,” which included a dedicated GPS
11 device, but the GPS was only able to provide real-time GPS data, and he could not pull any data
12 from previous days.

13 40. Ultimately, W.J.R. was not able to account for the missing 7,716 individual cannabis
14 units, provide any delivery logs or sales receipts for the deliveries, or provide any records of
15 inventory reconciliation.

16 41. When Department staff asked about Weedyy, W.J.R. replied that Weedyy was a
17 consultant that Respondent had hired. When asked about why other business names, previously
18 confirmed by Owner Abramian to have been removed, still appeared on the Weedyy website,
19 W.J.R. stated that Respondent had issued cease-and-desist letters to all other FBNs and DBAs and
20 that he was “not sure why the licensee number” for Respondent was on the Weedyy website.
21 Department staff then asked why, if Weedyy was a consultant, was Respondent using the Weedyy
22 DBA, and W.J.R. was unable to answer. Department staff then informed W.J.R that it would be
23 requesting business records from Respondent and ended the inspection.

24 42. On January 28, 2026, Department staff issued a formal business records request to
25 Respondent asking for, among other things, (1) surveillance recordings from January 8, 2026, to
26 January 27, 2026, (2) all previous correspondence between Respondent and the Department; (3)
27 all cease-and-desist notices sent by Respondent to any DBA or FBN associated with Respondent;
28 (4) all contracts with any consultant businesses; (5) all contracts between Respondent and any

1 DBA or associated business from January 1, 2023, to present; (6) employment records associated
2 with Respondent's licensed premises since January 1, 2023, (7) records of reconciliation from
3 January 1, 2023, to present, (8) all bank deposits from January 1, 2023, to present, (9) driver
4 receipts from all deliveries from January 1, 2023, to present, (10) delivery vehicle GPS dates
5 from October 30, 2023, or 90 days prior to the request, (11) sales records from January 1, 2023, to
6 present, and (12) any and all Standard Operating Procedures.

7 43. As of February 5, 2026, Respondent has provided some of the requested records, but
8 not all. Notably, surveillance recordings for most of the requested dates are incomplete and the
9 sales receipts appear not to be plausible and/or authentic. Specifically, Department staff
10 attempted to call several of the phone numbers recorded for delivery customers; three were out of
11 service, two were wrong numbers, and one was a prerecorded line for an unnamed travel agency.
12 Additionally, all the email addresses recorded for delivery customers followed the same
13 "user#####@gmail.com" format, for example user8074@gmail.com, user6758@gmail.com,
14 user8944@gmail.com, etc. Finally, Department staff researched several of the physical addresses
15 listed for delivery sales on Google Maps and Landvision, and none of the addresses were
16 legitimate physical addresses to which cannabis products are permitted to be delivered.

17 **FIRST CAUSE FOR DISCIPLINE**

18 (Conducting Cannabis Activity and Storage of Inventory Within the Licensed Premises)

19 44. Respondent is subject to disciplinary action under Code section 26030, subdivisions
20 (a) and (c), and California Code of Regulations, title 4, sections 15000.1 subdivision (c), and
21 15000.7, subdivision (a), in that Respondent conducted commercial cannabis activities beyond
22 the premises licensed for the activity and failed to store all cannabis and cannabis products solely
23 within the licensed premises, as more particularly alleged in paragraphs 31 through 43, above,
24 which are hereby incorporated by reference and realleged as if fully set forth herein.

25 **SECOND CAUSE FOR DISCIPLINE**

26 (Unauthorized Licensed Commercial Cannabis Activity)

27 45. Respondent is further subject to disciplinary action under Code sections 26030,
28 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.1 subdivision

1 (c), and 15414, subdivisions (a) and (d), in that Respondent conducted commercial cannabis
2 activities beyond what was authorized by the license by making in-person sales to customers, as
3 more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
4 reference and realleged as if fully set forth herein.

5 **THIRD CAUSE FOR DISCIPLINE**

6 (CCTT Reporting)

7 46. Respondent is further subject to disciplinary action under Code sections 26030,
8 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2,
9 subdivisions (b) and (d), 15049, subdivisions (b)(1) and (b)(8), and 15049.3, subdivisions (a)
10 through (c), in that Respondent failed to accurately record all commercial cannabis activity in the
11 California Cannabis Track and Trace system (CCTT) by falsifying business records, by recording
12 delivery sales as in-person sales, failed to record receipt of cannabis or cannabis products in
13 CCTT within 24 hours, failed to record sales or donations of cannabis products in CCTT within
14 24 hours, failed to create delivery inventory ledgers prior to delivery employees leaving the
15 licensed premises, and failed to record delivery information in CCTT by the end of the calendar
16 day on which the delivery was completed, as more particularly alleged in paragraphs 31 through
17 43, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

18 **FOURTH CAUSE FOR DISCIPLINE**

19 (Inventory Reconciliation)

20 47. Respondent is further subject to disciplinary action under Code sections 26030,
21 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15048.1, subdivision
22 (a)(8), 15051, subdivision (a)(1), 15423, and 15424, subdivisions (a) through (c), in that
23 Respondent failed to reconcile inventory at least once every 30 days, failed to maintain an
24 accurate record of inventory or provide DCC with such record, failed to account for all inventory,
25 failed to verify that the physical inventory was consistent with the recorded inventory, and failed
26 to retain records of inventory reconciliation and make those records available to the Department,
27 as more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated
28 by reference and realleged as if fully set forth herein.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Delivery Employees)

3 48. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15415, in that
5 Respondent failed to provide evidence of compliance with delivery employee requirements, as
6 more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **SIXTH CAUSE FOR DISCIPLINE**

9 (Deliveries Facilitated by Technology Platforms)

10 49. Respondent is further subject to disciplinary action under Code sections 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15415.1, subdivision
12 (b)(3), in that Respondent failed to ensure that a third-party technology service provider did not
13 use the Licensee's license number, as more particularly alleged in paragraphs 31 through 43,
14 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

15 **SEVENTH CAUSE FOR DISCIPLINE**

16 (Deliveries to Physical Addresses)

17 50. Respondent is further subject to disciplinary action under Code sections 26030,
18 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15416, subdivision
19 (a), in that Respondent failed to ensure deliveries were made only to physical addresses, as more
20 particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
21 reference and realleged as if fully set forth herein.

22 **EIGHTH CAUSE FOR DISCIPLINE**

23 (Delivery Vehicle Requirements)

24 51. Respondent is further subject to disciplinary action under Code sections 26030,
25 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15417, subdivision
26 (d), in that Respondent failed to outfit its delivery vehicle with a dedicated Global Positioning
27 System (GPS) device that recorded a history of all locations traveled to by the delivery employee
28

1 while engaged in delivery, as more particularly alleged in paragraphs 31 through 43, above,
2 which are hereby incorporated by reference and realleged as if fully set forth herein.

3 **NINTH CAUSE FOR DISCIPLINE**

4 (Cannabis Goods Carried During Delivery)

5 52. Respondent is further subject to disciplinary action under Code sections 26030,
6 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15418, subdivisions
7 (d) through (f), and 15420, in that Respondent failed to ensure that delivery employees had a
8 delivery inventory ledger before leaving the licensed premises, maintained a log of all stops,
9 received a delivery request receipt prior to arrival at any delivery location, and prepared delivery
10 request receipts for each delivery of cannabis goods, as more particularly alleged in paragraphs 31
11 through 43, above, which are hereby incorporated by reference and realleged as if fully set forth
12 herein.

13 **TENTH CAUSE FOR DISCIPLINE**

14 (Failure to Cooperate)

15 53. Respondent is further subject to disciplinary action under Code sections 26030,
16 subdivisions (a) and (c), and California Code of Regulations, title 4, section 17800, subdivision
17 (b), in that Respondent failed to cooperate with, and participate in, a Department investigation
18 against the Licensee by providing contradictory, misleading, or false information, as well as
19 fabricated documents such that Licensee's actions actively impeded the investigation, as more
20 particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
21 reference and realleged as if fully set forth herein.

22 **ELEVENTH CAUSE FOR DISCIPLINE**

23 (Local Authorization)

24 54. Respondent is further subject to disciplinary action under Code section 26030,
25 subdivision (f), in that Respondent conducted commercial cannabis deliveries in the City of
26 Ventura without local authorization, as more particularly alleged in paragraphs 31 through 43,
27 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

28 ///

1 **TWELFTH CAUSE FOR DISCIPLINE**

2 (Ownership Change)

3 55. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15023, subdivision
5 (c), in that Respondent failed to comply with the Department’s ownership change requirements,
6 as more particularly alleged in paragraphs 31 through 4, above, which are hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **PRAYER**

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

11 1. Revoking or suspending outright or suspending with terms and conditions or fining or
12 any combination thereof, the Cannabis - Retailer Non-Storefront License Number C9-0000683-
13 LIC, issued to Respondent LACC, LLC with Alfred Abramian, Designated Responsible Party and
14 Owner;

15 2. Ordering Respondent LACC, LLC with Alfred Abramian, Designated Responsible
16 Party and Owner, to pay the Department of Cannabis Control the reasonable costs of the
17 investigation and enforcement of this case, pursuant to Business and Professions Code section
18 26031.1;

19 3. Ordering the destruction of cannabis and cannabis goods in the possession of LACC,
20 LLC with Alfred Abramian, Designated Responsible Party and Owner, at Respondent's expense,
21 if revocation of Cannabis - Retailer Non-Storefront License Number C9-0000683-LIC is ordered,
22 pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

24 DATED: March 4, 2026

Evelyn Schaeffer

25 EVELYN SCHAEFFER
26 Deputy Director of the Compliance
27 Division
28 Department of Cannabis Control
State of California
Complainant

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

In the Matter of the Accusation Against:

**LACC, LLC;
ALFRED ABRAMIAN, DRP/OWNER
1316 S. Los Angeles Street, Suite B
Los Angeles, CA 90015**

**Cannabis Retailer - Non-Storefront License
No. C9-0000683-LIC**

Respondent.

Case No. DCC26-0000102-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. DCC26-0000102-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 LACC, LLC; Alfred Abramian, Designated Responsible Party/Owner Cannabis Retailer - Non-Storefront License No. C9-0000683-LI ;

Exhibit 3: Certification of Costs by Department for Investigation in Case No. DCC26-0000102-INV dated April 14, 2026;

Exhibit 4: Certification of Costs by Department for Enforcement in Case No. DCC26-0000102-INV dated April 20, 2026; and

Exhibit 5: Investigative Report (without attachments) [DCC26-0000102-INV].

Dated: April 20, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California



GREGORY M. CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

Exhibit 1

Accusation No. DCC26-0000102-INV
Statement to Respondent
Notice of Defense
Request for Discovery
Discovery Statutes, Proofs of Service

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**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:
11 **LACC, LLC dba CCG DELIVERY;**
12 **ALFRED ABRAMIAN, DRP/OWNER**
13 Respondent.

Case No. DCC26-0000102-INV
STATEMENT TO RESPONDENT
[Gov. Code §§ 11504, 11505(b)]

14
15 **TO RESPONDENT:**

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

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

24 The request for hearing may be made by delivering or mailing one of the enclosed forms
25 entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in
26 section 11506 of the Government Code, to
27
28

1 **Gregory M. Cribbs**
2 **Supervising Deputy Attorney General**
3 **300 South Spring Street, Suite 1702**
4 **Los Angeles, CA 90013**

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

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

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

12 The hearing may be postponed for good cause. If you have good cause, you are obliged to
13 notify the Office of Administrative Hearings, 320 West Fourth Street, Suite 630, Los Angeles,
14 CA 90013, within ten (10) working days after you discover the good cause. Failure to notify the
15 Office of Administrative Hearings within ten (10) days will deprive you of a postponement.

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

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

21 **NOTICE REGARDING STIPULATED SETTLEMENTS**

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

27 Any stipulation must be consistent with the Department's established disciplinary
28 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the

1 Department's Disciplinary Guidelines will be provided to you on your written request to the state
2 agency bringing this action.

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

6 Dated: March 5 , 2026

ROB BONTA
Attorney General of California
HARINDER K. KAPUR
Senior Assistant Attorney General

Gregory M. Cribbs

GREGORY M. CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27 LA2026800606
85598416.docx

28

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**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10
11 In the Matter of the Accusation Against:

Case No. DCC26-0000102-INV

12 **LACC, LLC dba CCG DELIVERY;**
13 **ALFRED ABRAMIAN, DRP/OWNER**
14 **1316 S. Los Angeles Street, Suite B**
15 **Los Angeles, CA 90015**

ACCUSATION

16 **Cannabis - Retailer Non-Storefront License**
17 **No. C9-0000683-LIC**

Respondent.

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. On or about January 6, 2023, the Department issued Cannabis - Retailer Non-
23 Storefront License C9-0000683-LIC to LACC, LLC (Respondent) with Alfred Abramian,
24 Designated Responsible Party and Owner (Owner Abramian). The Cannabis Retailer Non-
25 Storefront License was in full force and effect at all times relevant to the charges brought herein
26 and will expire on January 6, 2027, unless renewed.

27 ///

28 ///

1 **PROCEDURAL HISTORY**

2 3. The Department issued an Emergency Decision and Order (EDO), pursuant to
3 California Code of Regulations, title 4, section 17815, that was served on Respondent on
4 February 23, 2026, and was effective the same day at 5:00 p.m. The EDO suspended
5 Respondent’s retailer non-storefront license and ordered Respondent to cease all commercial
6 cannabis activity. The time to initiate adjudicative proceedings is within 10 days after the
7 issuance or effective date of the EDO, or in this case by or on March 5, 2026.

8 **JURISDICTION**

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

12 5. Section 26010 of the Code states:

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

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

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

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

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

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

23 The department shall make and prescribe reasonable rules and regulations as
24 may be necessary to implement, administer, and enforce its duties under this division
25 in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of
26 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.

27 ///

28 ///

1 9. Section 26031 of the Code states:

2 (a) The department may suspend, revoke, place on probation with terms and
3 conditions, or otherwise discipline licenses issued by the department and fine a
4 licensee, after proper notice and hearing to the licensee, except as provided in Section
5 26031.01, if the licensee is found to have committed any of the acts or omissions
6 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.

7 (b) The department may suspend or revoke a license when a local agency has
8 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.

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

12 (d) The suspension or expiration of a license issued by the department, or its
13 suspension, forfeiture, or cancellation by order of the department or by order of a
14 court of law, or its surrender without the written consent of the department, shall not,
15 during any period in which it may be renewed, restored, reissued, or reinstated,
16 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.

17 10. Section 26034 of the Code states:

18 All accusations against licensees shall be filed by the department within five
19 years after the performance of the act or omission alleged as the ground for
20 disciplinary action; provided, however, that the foregoing provision shall not
21 constitute a defense to an accusation alleging fraud or misrepresentation as a ground
22 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.

23 **STATUTORY PROVISIONS**

24 11. Section 26030 of the Code states:

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

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

...

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

3 ...

4 (f) Failure to comply with the requirement of a local ordinance regulating
5 commercial cannabis activity....

6 **REGULATORY PROVISIONS**

7 12. Title 4 of the California Code of Regulations, section 15000.1, subdivision (c), states:

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

10 13. Title 4 of the California Code of Regulations, section 15000.7, subdivision (a), states:

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

13 14. Title 4 of the California Code of Regulations, section 15023, subdivision (c), states:

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

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

...
23

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

...
25

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

...
28

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

1 16. Title 4 of the California Code of Regulations, section 15048.1, subdivision (a)(8),
2 states:

3 (a) A licensee and their designated account manager(s) shall:

4 ...
5 (8) Reconcile the inventory of cannabis and cannabis products on the licensed
6 premises with the track and trace system database at least once every thirty (30)
7 calendar days.

8 17. Title 4 of the California Code of Regulations, section 15049, states, in pertinent part:

9 ...

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

12 (1) Receipt of cannabis or cannabis products.

13 ...

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

15 18. Title 4 of the California Code of Regulations, section 15049.3, states:

16 (a) A licensed retailer conducting delivery of cannabis goods shall create a
17 delivery inventory ledger in the track and trace system and record the information
18 required under subsections (b)(1) through (7) prior to the delivery employee leaving
19 the licensed retail premises for each delivery trip. A delivery trip begins when the
20 delivery employee leaves the licensed retail premises to conduct delivery of cannabis
21 goods.

22 (b) The delivery inventory ledger shall include the following information:

23 (1) The delivery inventory ledger number generated by the track and trace
24 system and assigned to the specific delivery trip.

25 (2) The name and license number of the licensed retailer.

26 (3) The delivery employee's name, employee ID, and driver's license number.

27 (4) The delivery vehicle's make, model, and license plate number.

28 (5) The item name and category of each cannabis good to be carried on the
delivery trip, the UID(s) assigned to those cannabis goods, and the number of units
associated with each UID on the delivery inventory ledger.

(6) The UID(s) of any cannabis goods ordered by customers and processed by
the licensed retailer prior to the delivery employee leaving the licensed retail
premises.

(7) The date and time the delivery employee begins the delivery trip.

1 (c) For each delivery of cannabis goods, the following information shall be
2 recorded within the track and trace system by the end of the calendar day on which
the delivery was completed:

3 (1) The date and time the delivery was completed. A delivery is completed at
4 the time the cannabis goods are physically provided to the customer.

5 (2) Whether the customer is an adult-use customer, medicinal cannabis patient,
or patient's primary caregiver.

6 (3) The UID and quantity of each cannabis good delivered.

7 (4) The purchase price of each cannabis good delivered.

8 (5) The city, county, and zip code in which the delivery was completed.

9 19. Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1),
10 states:

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

13 (1) Reconciling on-hand inventory of cannabis and cannabis product with the
14 records in the track and trace system...

15 20. Title 4 of the California Code of Regulations, section 15414, subdivision (a), states:

16 (a) A non-storefront retailer licensee shall be authorized to conduct retail sales
17 exclusively by delivery as defined in Business and Professions Code section
26001(o).

18 21. Title 4 of the California Code of Regulations, section 15415, states:

19 (a) All deliveries of cannabis goods shall be performed by a delivery employee
20 who is directly employed by a licensed retailer.

21 (b) Each delivery employee of a licensed retailer shall be at least 21 years of
age.

22 (c) All deliveries of cannabis goods shall be made in person. A delivery of
23 cannabis goods shall not be made through the use of an unstaffed vehicle.

24 (d) Deliveries of cannabis goods shall be received by customers only during the
hours of operation established by section 15403. Delivery employees shall return to
25 the licensed premises after making their last delivery of the day if they have any
unsold cannabis goods to return to the premises.

26 (e) During the process of delivery, the licensed retailer's delivery employee may
27 not engage in any activities except for cannabis goods delivery and necessary rest,
fuel, or vehicle repair stops.

28 (f) A delivery employee of a licensed retailer shall, during deliveries, carry a

1 copy of the retailer's current license, a copy of the QR Code certificate issued by the
2 Department, which complies with section 15039, subsection (d), the employee's
3 government-issued identification, and an identification badge provided by the
4 employer pursuant to section 15043. A delivery employee shall provide a copy of the
5 retail license, a copy of the QR Code certificate, and their employee identification
6 badge to a delivery customer upon request.

7 (g) Prior to providing cannabis goods to a delivery customer, a delivery
8 employee shall confirm the identity and age of the delivery customer as required by
9 section 15404 and ensure that all cannabis goods sold comply with requirements of
10 section 15413.

11 (h) A licensed retailer shall maintain an accurate list of the retailer's delivery
12 employees and shall provide the list to the Department upon request.

13 22. Title 4 of the California Code of Regulations, section 15415.1, subdivision (b)(3),
14 states:

15 ...

16 (b) Notwithstanding subsection (a) of this section, a licensed retailer or licensed
17 microbusiness may contract with a service that provides a technology platform to
18 facilitate the sale and delivery of cannabis goods, in accordance with all of the
19 following:

20 ...

21 (3) The licensed retailer or licensed microbusiness shall not advertise or market
22 cannabis goods in conjunction with the technology platform service provider, outside
23 of the technology platform, and shall ensure that the technology platform service
24 provider does not use the licensed retailer's or licensed microbusiness's license
25 number or legal business name on any advertisement or marketing that primarily
26 promotes the services of the technology platform....

27 23. Title 4 of the California Code of Regulations, section 15416, subdivision (a), states:

28 (a) A delivery employee may only deliver cannabis goods to a physical address
in California.

29 24. Title 4 of the California Code of Regulations, section 15417, subdivision (d), states:

30 ...

31 (d) A vehicle used for the delivery of cannabis goods shall be outfitted with a
32 dedicated Global Positioning System (GPS) device for identifying the geographic
33 location of the delivery vehicle and recording a history of all locations traveled to by
34 the delivery employee while engaged in delivery. A dedicated GPS device must be
35 owned by the licensee and used for delivery only. The device shall be either
36 permanently or temporarily affixed to the delivery vehicle and shall remain active and
37 inside of the delivery vehicle at all times during delivery. At all times, the licensed
38 retailer shall be able to identify the geographic location of all delivery vehicles that
are making deliveries for the licensed retailer and document the history of all

1 locations traveled to by a delivery employee while engaged in delivery. A licensed
2 retailer shall provide this information to the Department upon request. The history of
3 all locations traveled to by a delivery employee while engaging in delivery shall be
4 maintained by the licensee for a minimum of 90 days....

5
6 25. Title 4 of the California Code of Regulations, section 15418, states, in pertinent part:

7 ...

8 (d) Before leaving the licensed premises, the licensed retailer's delivery
9 employee must have a delivery inventory ledger of all cannabis goods provided to the
10 licensed retailer's delivery employee. The contents of the delivery inventory ledger
11 must comply with the requirements of section 15049.3. During the delivery trip, as
12 defined in section 15049.3, the delivery employee shall maintain the delivery
13 inventory ledger in hard copy or electronically, the latter of which may be an
14 electronic copy maintained in the track and trace system. The delivery inventory
15 ledger must be updated after each completed delivery to reflect the remaining
16 inventory carried by the delivery employee. The delivery inventory ledger must
17 otherwise be updated in accordance with the requirements of section 15049.3, and
18 then entered into the track and trace system no later than the end of the calendar day
19 on which the delivery trip occurred.

20 (e) The licensed retailer's delivery employee shall maintain a log that includes
21 all stops from the time the licensed retailer's delivery employee leaves the licensed
22 premises to the time that the licensed retailer's delivery employee returns to the
23 licensed premises, and the reason for each stop. The log shall be turned in to the
24 licensed retailer when the licensed retailer's delivery employee returns to the licensed
25 premises. The licensed retailer must maintain the log as a commercial cannabis
26 activity record as required by this division. The log may be maintained electronically.

27 (f) Prior to arrival at any delivery location, the licensed retailer must have
28 received a delivery request from the customer and provided the delivery request
receipt to the licensed retailer's delivery employee electronically or in hard copy. The
delivery request receipt provided to the licensed retailer's delivery employee shall
contain all of the information required in section 15420, except for the date and time
the delivery was made, and the signature of the customer.

29 26. Title 4 of the California Code of Regulations, section 15420, states:

30 (a) The delivery request receipt shall contain the following:

31 (1) The legal business name and license number of the licensed retailer;

32 (2) The first name and employee number of the licensed retailer's delivery
33 employee who delivered the order;

34 (3) The first name and employee number of the licensed retailer's employee
35 who prepared the order for delivery;

36 (4) The first name of the customer and a licensed retailer-assigned customer
37 number for the person who requested the delivery;

38 (5) The date and time the delivery request was made;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(6) The delivery address;

(7) A detailed description of all cannabis goods requested for delivery. The description shall include the weight, volume, or any other accurate measure of the amount of all cannabis goods requested;

(8) The total amount paid for the delivery, including any taxes or fees, the cost of the cannabis goods, and any other charges related to the delivery; and

(9) Upon delivery, the date and time the delivery was made, and the handwritten or electronic signature of the customer who received the delivery.

(b) At the time of the delivery, the delivery employee of the retailer shall provide the customer who placed the order with a hard or electronic copy of the delivery request receipt. The delivery employee shall retain a hard or electronic copy of the signed delivery request receipt for the licensed retailer's records.

(c) For the purposes of this section, an employee number is a distinct number assigned by a licensed retailer to an employee that would allow the licensed retailer to identify the employee in documents or records using the employee number rather than the employee's full name. A licensed retailer shall be able to identify the employee associated with each employee number upon request from the Department.

(d) For the purposes of this section, a customer number is a distinct number assigned by a licensed retailer to a customer that would allow the licensed retailer to identify the customer in documents or records using the customer number rather than the customer's full name. A licensed retailer shall be able to identify the customer associated with each customer number upon request from the Department.

27. Title 4 of the California Code of Regulations, section 15423, states:

A licensed retailer shall maintain an accurate record of its inventory. A licensed retailer shall provide the Department with the record of inventory immediately upon request. A licensed retailer shall keep a record of the following information for all cannabis goods the licensed retailer has in its inventory:

(a) A description of each item such that the cannabis goods can easily be identified;

(b) An accurate measurement of the quantity of the item;

(c) The date and time the cannabis goods were received by the licensed retailer;

(d) The sell-by or expiration date provided on the package of cannabis goods, if any;

(e) The name and license number of the licensed distributor or licensed microbusiness that transported the cannabis goods to the licensed retailer; and

(f) The price the licensed retailer paid for the cannabis goods, including taxes, delivery costs, and any other costs.

///

1 28. Title 4 of the California Code of Regulations, section 15424, states, in pertinent part:

2 (a) A licensed retailer shall be able to account for all of its inventory.

3 (b) In conducting an inventory reconciliation, a licensed retailer shall verify that
4 the licensed retailer's physical inventory is consistent with the licensed retailer's
records pertaining to inventory.

5 (c) The result of inventory reconciliation shall be retained in the licensed
6 retailer's records and shall be made available to the Department upon request....

7 29. Title 4 of the California Code of Regulations, section 17800, subdivision (b), states:

8 ...

9 (b) Failure to cooperate with and participate in any Department investigation
10 pending against the licensee may result in a licensing violation subject to discipline.
This subsection shall not be construed to deprive a licensee of any privilege
11 guaranteed by the Fifth Amendment to the Constitution of the United States, or any
other constitutional or statutory privileges. This subsection shall not be construed to
12 require a licensee to cooperate with a request that would require the licensee to waive
any constitutional or statutory privilege or to comply with a request for information or
13 other matters within an unreasonable period of time in light of the time constraints of
the licensee's business. Any constitutional or statutory privilege exercised by the
14 licensee shall not be used against the licensee in a regulatory or disciplinary
proceeding against the licensee....

15 **COST RECOVERY**

16 30. Section 26031.1 of the Code states:

17 (a) Except as otherwise provided by law, in an order issued in resolution of a
18 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
19 exceed the reasonable costs of the investigation and enforcement of the case.

20 (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
21 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
22 enforcement costs up to the date of the hearing, including, but not limited to, charges
imposed by the Attorney General.

23 (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
24 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
25 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
26 to subdivision (a).

27 ///

28 ///

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

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

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

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

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

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

21 **FACTUAL ALLEGATIONS**

22 31. On January 27, 2026, Department staff conducted an unannounced compliance
23 inspection at Respondent's licensed premises, located at 1316 S. Los Angeles Street, Suite B, Los
24 Angeles, California, 90015 (licensed premises). Upon arrival, Department staff called
25 Respondent's owners,¹ who did not answer the call(s). Department staff left a voicemail message
26 for Owner Abramian, but could not do so for Owner Karagezyan, whose voicemail mailbox was
27 full. Department staff then called the business number for Respondent, which had a prerecorded
28 message system, and left a voicemail message.

32. Shortly after leaving a voicemail message, Department staff received a call back from
an individual who identified himself as "W.J.R.," and who explained that Owner Abramian
forwarded to him the Department staff's message, and that he was the new "owner" of the license

¹ Owners, as defined by Business and Professions Code section 26001, subdivision (av), associated with Respondent are Alfred Abramian (Owner Abramian) and Vartan Karagezyan (Owner Karageyan).

1 and there were no employees at the licensed premises at that time. W.J.R. agreed to meet
2 Department staff at the licensed premises.

3 33. While waiting for W.J.R. to arrive, Department staff reviewed the Department's
4 licensing system but found no official notification from Respondent (DCC Form-027) listing
5 W.J.R. as an owner of Respondent. Instead, Owner Abramian submitted a Fictitious Business
6 Name (FBN) change, including 35 additional Doing Business As (DBA) names. In response to
7 that submission, the Department advised Owner Abramian that a license could only have one
8 DBA, but could have multiple FBNs. In response, Owner Abramian stated that he wanted to
9 update Respondent's DBA to "Weedyy" and with "CCG Delivery" as the only additional FBN.
10 Department staff conducted an online search for the name Weedyy and discovered a website for
11 cannabis delivery in the Los Angeles area. The Weedyy website listed hyperlinks to multiple
12 dispensary names, including several of Respondent's purported DBAs such as "Kushfly," "Juana
13 Shoppe," and "Queen B'z Delivery," which when clicked, directed Department staff to the
14 businesses' corresponding websites. Department staff discovered that Respondent's license
15 number, C9-0000683-LIC, was also displayed on the linked websites. Each website was
16 advertising cannabis goods that were not recorded in Respondent's California Cannabis Track
17 and Trace (CCTT) account.

18 34. While further searching the Department's licensing records, Department staff
19 discovered a notice from the City of Ventura Code Enforcement had been issued to Respondent
20 on May 20, 2025, which stated that Respondent was in violation of conducting cannabis
21 deliveries in the City of Ventura without local authorization.

22 35. Department staff searched Respondent's CCTT account and discovered that
23 Respondent had not created any retail ledgers or delivery sales manifests since 2024, but between
24 January 8, 2026, and January 26, 2026, Respondent had recorded 75 separate in-person sales
25 receipts, comprised of 273 individual items, for a recorded sales total of \$4,702.41. Department
26 staff further discovered that in 2025, Respondent received 36 incoming transfers of cannabis
27 goods comprised of 394 distinct UUIDs (Unique Identifiers) for a total of 5,431 units, equaling
28 \$38,427.77. However, per Respondent's CCTT account, Respondent only reported one in-person

1 sale in 2025, which occurred on March 5, 2025, for a total of \$11.00. For 2026, Department staff
2 discovered that between January 5, 2026, and January 26, 2026, Respondent received 11
3 incoming transfers, comprised of 140 distinct Unique Identifier tags (UIDs) totaling 2,578 units,
4 and recorded a wholesale price totaling \$13,616.31. A non-storefront retailer like Respondent
5 may not make in-person sales and may only make delivery sales to physical addresses.

6 36. After continued review of Respondent's CCTT account, Department staff determined
7 that Respondent had 555 active packages reported in its inventory, meaning there were 555
8 distinct UIDs that were not finished nor discontinued, and had a quantity of over 0. This equaled
9 a total of 7,736 individual units in Respondent's CCTT inventory that should have been present
10 on the licensed premises.

11 37. Once W.J.R. arrived at the licensed premises, Department staff were escorted inside,
12 they immediately discovered that the only on-site inventory comprised of 20 cannabis vape
13 cartridges, which had UID tags correlating with incoming manifest transfer number ending in 318
14 (UID 318), and which was received 4 days earlier, on January 23, 2026. Department staff could
15 not locate the remaining, and missing, 7,716 units of cannabis and cannabis products at the
16 licensed premises. When Department staff asked W.J.R. where the missing cannabis goods were
17 located, he replied that "they all had been sold." When asked where the sales had been recorded,
18 W.J.R. replied that he believed that the point-of-sale system was not recording sales. When
19 Department staff questioned W.J.R. about the inconsistency, as they had reviewed Respondent's
20 CCTT account and discovered that there were approximately 75 sales recorded in January 2026,
21 W.J.R. replied that they did have recorded sales recorded, because they had a small number of
22 customers who were still placing orders. Department staff then asked W.J.R. if he had access to
23 Respondent's CCTT account and he replied that he did not have his own account. In addition to
24 the previously identified 20 vape cartridges, Department staff discovered a stack of UID 318 tags
25 that were listed on manifest 0010187318, but did not have associated cannabis goods with them.
26 When Department staff inquired why, W.J.R. replied that "they had been given away as samples
27 to customers." Department staff then asked if those customers had been charged for the samples,
28

1 and W.J.R. replied that the customers were charged 1 cent, but he was unable to provide any
2 receipts showing those charges had been recorded.

3 38. When Department staff asked W.J. R. to show them video of delivery drivers packing
4 up deliveries, he was unable to find any footage of drivers packing orders as requested, but stated
5 he could find them if he had more time.

6 39. Department staff then asked W.J.R. where the money from the deliveries was located,
7 and he initially replied that it “was deposited in the bank.” When Department staff further
8 inquired that some of the sales recorded had occurred at 9:11 p.m. and 9:12 p.m. the evening
9 prior, W.J.R. then changed his reply and stated that “the driver still had the money.” W.J.R. also
10 stated that the delivery driver also still had the “driver kit,” which included a dedicated GPS
11 device, but the GPS was only able to provide real-time GPS data, and he could not pull any data
12 from previous days.

13 40. Ultimately, W.J.R. was not able to account for the missing 7,716 individual cannabis
14 units, provide any delivery logs or sales receipts for the deliveries, or provide any records of
15 inventory reconciliation.

16 41. When Department staff asked about Weedyy, W.J.R. replied that Weedyy was a
17 consultant that Respondent had hired. When asked about why other business names, previously
18 confirmed by Owner Abramian to have been removed, still appeared on the Weedyy website,
19 W.J.R. stated that Respondent had issued cease-and-desist letters to all other FBNs and DBAs and
20 that he was “not sure why the licensee number” for Respondent was on the Weedyy website.
21 Department staff then asked why, if Weedyy was a consultant, was Respondent using the Weedyy
22 DBA, and W.J.R. was unable to answer. Department staff then informed W.J.R that it would be
23 requesting business records from Respondent and ended the inspection.

24 42. On January 28, 2026, Department staff issued a formal business records request to
25 Respondent asking for, among other things, (1) surveillance recordings from January 8, 2026, to
26 January 27, 2026, (2) all previous correspondence between Respondent and the Department; (3)
27 all cease-and-desist notices sent by Respondent to any DBA or FBN associated with Respondent;
28 (4) all contracts with any consultant businesses; (5) all contracts between Respondent and any

1 DBA or associated business from January 1, 2023, to present; (6) employment records associated
2 with Respondent's licensed premises since January 1, 2023, (7) records of reconciliation from
3 January 1, 2023, to present, (8) all bank deposits from January 1, 2023, to present, (9) driver
4 receipts from all deliveries from January 1, 2023, to present, (10) delivery vehicle GPS dates
5 from October 30, 2023, or 90 days prior to the request, (11) sales records from January 1, 2023, to
6 present, and (12) any and all Standard Operating Procedures.

7 43. As of February 5, 2026, Respondent has provided some of the requested records, but
8 not all. Notably, surveillance recordings for most of the requested dates are incomplete and the
9 sales receipts appear not to be plausible and/or authentic. Specifically, Department staff
10 attempted to call several of the phone numbers recorded for delivery customers; three were out of
11 service, two were wrong numbers, and one was a prerecorded line for an unnamed travel agency.
12 Additionally, all the email addresses recorded for delivery customers followed the same
13 "user#####@gmail.com" format, for example user8074@gmail.com, user6758@gmail.com,
14 user8944@gmail.com, etc. Finally, Department staff researched several of the physical addresses
15 listed for delivery sales on Google Maps and Landvision, and none of the addresses were
16 legitimate physical addresses to which cannabis products are permitted to be delivered.

17 **FIRST CAUSE FOR DISCIPLINE**

18 (Conducting Cannabis Activity and Storage of Inventory Within the Licensed Premises)

19 44. Respondent is subject to disciplinary action under Code section 26030, subdivisions
20 (a) and (c), and California Code of Regulations, title 4, sections 15000.1 subdivision (c), and
21 15000.7, subdivision (a), in that Respondent conducted commercial cannabis activities beyond
22 the premises licensed for the activity and failed to store all cannabis and cannabis products solely
23 within the licensed premises, as more particularly alleged in paragraphs 31 through 43, above,
24 which are hereby incorporated by reference and realleged as if fully set forth herein.

25 **SECOND CAUSE FOR DISCIPLINE**

26 (Unauthorized Licensed Commercial Cannabis Activity)

27 45. Respondent is further subject to disciplinary action under Code sections 26030,
28 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.1 subdivision

1 (c), and 15414, subdivisions (a) and (d), in that Respondent conducted commercial cannabis
2 activities beyond what was authorized by the license by making in-person sales to customers, as
3 more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
4 reference and realleged as if fully set forth herein.

5 **THIRD CAUSE FOR DISCIPLINE**

6 (CCTT Reporting)

7 46. Respondent is further subject to disciplinary action under Code sections 26030,
8 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2,
9 subdivisions (b) and (d), 15049, subdivisions (b)(1) and (b)(8), and 15049.3, subdivisions (a)
10 through (c), in that Respondent failed to accurately record all commercial cannabis activity in the
11 California Cannabis Track and Trace system (CCTT) by falsifying business records, by recording
12 delivery sales as in-person sales, failed to record receipt of cannabis or cannabis products in
13 CCTT within 24 hours, failed to record sales or donations of cannabis products in CCTT within
14 24 hours, failed to create delivery inventory ledgers prior to delivery employees leaving the
15 licensed premises, and failed to record delivery information in CCTT by the end of the calendar
16 day on which the delivery was completed, as more particularly alleged in paragraphs 31 through
17 43, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

18 **FOURTH CAUSE FOR DISCIPLINE**

19 (Inventory Reconciliation)

20 47. Respondent is further subject to disciplinary action under Code sections 26030,
21 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15048.1, subdivision
22 (a)(8), 15051, subdivision (a)(1), 15423, and 15424, subdivisions (a) through (c), in that
23 Respondent failed to reconcile inventory at least once every 30 days, failed to maintain an
24 accurate record of inventory or provide DCC with such record, failed to account for all inventory,
25 failed to verify that the physical inventory was consistent with the recorded inventory, and failed
26 to retain records of inventory reconciliation and make those records available to the Department,
27 as more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated
28 by reference and realleged as if fully set forth herein.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Delivery Employees)

3 48. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15415, in that
5 Respondent failed to provide evidence of compliance with delivery employee requirements, as
6 more particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **SIXTH CAUSE FOR DISCIPLINE**

9 (Deliveries Facilitated by Technology Platforms)

10 49. Respondent is further subject to disciplinary action under Code sections 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15415.1, subdivision
12 (b)(3), in that Respondent failed to ensure that a third-party technology service provider did not
13 use the Licensee's license number, as more particularly alleged in paragraphs 31 through 43,
14 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

15 **SEVENTH CAUSE FOR DISCIPLINE**

16 (Deliveries to Physical Addresses)

17 50. Respondent is further subject to disciplinary action under Code sections 26030,
18 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15416, subdivision
19 (a), in that Respondent failed to ensure deliveries were made only to physical addresses, as more
20 particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
21 reference and realleged as if fully set forth herein.

22 **EIGHTH CAUSE FOR DISCIPLINE**

23 (Delivery Vehicle Requirements)

24 51. Respondent is further subject to disciplinary action under Code sections 26030,
25 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15417, subdivision
26 (d), in that Respondent failed to outfit its delivery vehicle with a dedicated Global Positioning
27 System (GPS) device that recorded a history of all locations traveled to by the delivery employee
28

1 while engaged in delivery, as more particularly alleged in paragraphs 31 through 43, above,
2 which are hereby incorporated by reference and realleged as if fully set forth herein.

3 **NINTH CAUSE FOR DISCIPLINE**

4 (Cannabis Goods Carried During Delivery)

5 52. Respondent is further subject to disciplinary action under Code sections 26030,
6 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15418, subdivisions
7 (d) through (f), and 15420, in that Respondent failed to ensure that delivery employees had a
8 delivery inventory ledger before leaving the licensed premises, maintained a log of all stops,
9 received a delivery request receipt prior to arrival at any delivery location, and prepared delivery
10 request receipts for each delivery of cannabis goods, as more particularly alleged in paragraphs 31
11 through 43, above, which are hereby incorporated by reference and realleged as if fully set forth
12 herein.

13 **TENTH CAUSE FOR DISCIPLINE**

14 (Failure to Cooperate)

15 53. Respondent is further subject to disciplinary action under Code sections 26030,
16 subdivisions (a) and (c), and California Code of Regulations, title 4, section 17800, subdivision
17 (b), in that Respondent failed to cooperate with, and participate in, a Department investigation
18 against the Licensee by providing contradictory, misleading, or false information, as well as
19 fabricated documents such that Licensee's actions actively impeded the investigation, as more
20 particularly alleged in paragraphs 31 through 43, above, which are hereby incorporated by
21 reference and realleged as if fully set forth herein.

22 **ELEVENTH CAUSE FOR DISCIPLINE**

23 (Local Authorization)

24 54. Respondent is further subject to disciplinary action under Code section 26030,
25 subdivision (f), in that Respondent conducted commercial cannabis deliveries in the City of
26 Ventura without local authorization, as more particularly alleged in paragraphs 31 through 43,
27 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

28 ///

1 **TWELFTH CAUSE FOR DISCIPLINE**

2 (Ownership Change)

3 55. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15023, subdivision
5 (c), in that Respondent failed to comply with the Department’s ownership change requirements,
6 as more particularly alleged in paragraphs 31 through 4, above, which are hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **PRAYER**

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

11 1. Revoking or suspending outright or suspending with terms and conditions or fining or
12 any combination thereof, the Cannabis - Retailer Non-Storefront License Number C9-0000683-
13 LIC, issued to Respondent LACC, LLC with Alfred Abramian, Designated Responsible Party and
14 Owner;

15 2. Ordering Respondent LACC, LLC with Alfred Abramian, Designated Responsible
16 Party and Owner, to pay the Department of Cannabis Control the reasonable costs of the
17 investigation and enforcement of this case, pursuant to Business and Professions Code section
18 26031.1;

19 3. Ordering the destruction of cannabis and cannabis goods in the possession of LACC,
20 LLC with Alfred Abramian, Designated Responsible Party and Owner, at Respondent's expense,
21 if revocation of Cannabis - Retailer Non-Storefront License Number C9-0000683-LIC is ordered,
22 pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

24 DATED: March 4, 2026

Evelyn Schaeffer

25 EVELYN SCHAEFFER
26 Deputy Director of the Compliance
27 Division
28 Department of Cannabis Control
State of California
Complainant

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**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. DCC26-0000102-INV

11 **LACC, LLC dba CCG DELIVERY;**
12 **ALFRED ABRAMIAN, DRP/OWNER**

REQUEST FOR DISCOVERY

13 Respondent.

14 TO RESPONDENT:

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

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

- 21 1. Provide the names and addresses of witnesses to the extent known to the Respondent,
22 including, but not limited to, those intended to be called to testify at the hearing, and
- 23 2. Provide an opportunity for the Complainant to inspect and make a copy of any of the
24 following in the possession or custody or under control of the Respondent:
 - 25 a. A statement of a person, other than the Respondent, named in the
26 initial administrative pleading, or in any additional pleading, when it is claimed that
27
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 and things which the Respondent now proposes to
9 offer in evidence;

10 e. Any other writing or thing which is relevant and which would be
11 admissible in evidence pertaining to the persons named in the pleading;

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 within 30 days
5 after service of the Accusation.

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

9 Dated: March 5 , 2026

ROB BONTA
Attorney General of California
HARINDER K. KAPUR
Senior Assistant Attorney General

Gregory M. Cribbs

GREGORY M. CRIBBS
Supervising Deputy Attorney General
Attorneys for Complainant

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27 LA2026800606
28 85598416.docx

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

In the Matter of the Accusation Against:

**LACC, LLC dba CCG DELIVERY;
ALFRED ABRAMIAN, DRP/OWNER,**

Respondent.

Case No. DCC26-0000102-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>.

LA2026800606
85598416.docx

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

In the Matter of the Accusation Against:

**LACC, LLC dba CCG DELIVERY;
ALFRED ABRAMIAN, DRP/ OWNER,**

Respondent.

Case No. DCC26-0000102-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>.

LA2026800606
85598416.docx

**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 SERVICE BY
CERTIFIED MAIL, FIRST CLASS MAIL AND EMAIL
(Separate Mailings)

Case Name: **In the Matter of the Accusation Against LACC LLC**

Case No.: **DCC26-0000102-INV**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On March 5, 2026, I served the attached **STATEMENT TO RESPONDENT, ACCUSATION, REQUEST FOR DISCOVERY, NOTICE OF DEFENSE (2 COPIES), AND DISCOVERY STATUTES** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **STATEMENT TO RESPONDENT, ACCUSATION, REQUEST FOR DISCOVERY, NOTICE OF DEFENSE (2 COPIES), AND DISCOVERY STATUTES** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, addressed as follows:

LACC, LLC Alfred Abramian, DRP and Owner 10031 Mason Avenue Chatsworth, CA 91311 alfredthegood@gmail.com	LACC, LLC Vartan Karagezyan, Owner 8010 Hollywood Way, Suite 215 Sun Valley, CA 91352 vitokmed@gmail.com
LACC, LLC Jana A. Cahn, Agent for Service of Process 333 North University Street, Unit 33 Redlands, CA 92374	

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 5, 2026, at Los Angeles, California.

Gail Agcaoili

Declarant

/s/ Gail Agcaoili

Signature

Exhibit 2

License History Certification for Respondent



Cannabis Retailer Nonstorefront License Adult-Use

Business Name:
LACC, LLC

Weedyy

License Number: C9-0000683-LIC
License Type: Retailer Nonstorefront
(Delivery)

The license authorizes LACC, 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.

Premises Address:
1316 S LOS ANGELES ST,
SUITE B
LOS ANGELES, CA 90015

Valid: 1/6/2023
Expires: 1/6/2027

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.



Valid:
1/6/2023

Expires:
1/6/2027

License No:
C9-0000683-LIC

Legal Business Name:
LACC, LLC
Weedy

Premises Address:
1316 S LOS ANGELES ST, SUITE B
LOS ANGELES, CA 90015

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 C9-0000683-LIC.



Department of
Cannabis Control
CALIFORNIA

Exhibit 3

Certification of Costs

1
2
3
4
5
6
7
8
9
10
11

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

In the Matter of the Accusation Against:

**LACC, LLC dba CCG DELIVERY;
ALFRED ABRAMIAN, DRP/OWNER
1316 S. Los Angeles Street, Suite B
Los Angeles, CA 90015**

**Cannabis - Retailer Non-Storefront License
No. C9-0000-683-LIC**

Respondent.

DCC Case No. DCC26-0000102-INV

**DECLARATION OF RUSSELL
POAG REGARDING
INVESTIGATIVE ACTIVITY**

12
13
14
15
16
17
18
19
20
21
22

I, Russell Poag, declare and certify as follows:

1. I am employed as a Special Investigator (SI) 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 a SI and as a public employee pursuant to Evidence Code section 664.
 3. The following list of staff were assigned to the investigation of this case, which was opened by the Department's Compliance Division on or about January 13, 2026: Lead SI Russell Poag, Supervising SI (SSI) Ashtyn Campbell, Environmental Scientist (ES) Jonathon Proskey, and ES Evan Robinson.
 4. In my official capacity as a SI, 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 Department's Compliance Division for the reasonable and necessary investigative work performed on a particular case. It is the duty of SIs and ESs to record the time spent on all
- 23
24
25
26
27
28

1 investigative activities at or near the time the activities are performed.

2 5. The investigative activity summary LACC, LLC Certification of Cost Recovery
3 includes the details of tasks performed by SIs and ESs. The costs related to investigative activity
4 include field time, research and report writing, meetings, and use of state vehicles. I hereby
5 certify that the LACC, LLC Certification of Cost Recovery, attached hereto and herein
6 incorporated by reference is a true and correct copy of the investigative activity for this case. The
7 investigative activity summary encompasses the total hours spent by the Department's ISB
8 through March 2, 2026. The investigative activity summary does not include tasks performed
9 after this date.

10 6. I certify pursuant to the provisions of Business and Professions Code section
11 26031.1 that to the best of my knowledge the costs of investigative services set forth in this
12 declaration are correct and were necessarily incurred in this case. The total hours of investigative
13 activity and rates applicable to the above-entitled case are as follows:

14 a) Field Time:

15 SI Rate per hour: \$101.00 multiplied by 10 hours = \$1,010.00

16 ES Rate per hour: \$114.00 multiplied by 10 hours = \$1,140.00

17 b) Research and Report Writing:

18 SI Rate per hour: \$101.00 multiplied by 97 hours = \$9,797.00

19 ES Rate per hour: \$114.00 multiplied by 10 hours = \$1,140.00

20 c) Use of Rental Vehicles:

21 1 rental vehicle cost = \$303.13

22 d) Airfare:

23 Airfare at \$612.57 per person per flight multiplied by 2 = \$1,225.14

24 e) Lodging:

25 Lodging at \$224.27 per person per night multiplied by 2 = \$448.54


26 f) Per diem expenses:

27 \$68.00 per person per day multiplied by 2 = \$136.00

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in Humboldt County on April 14, 2025.

 Digitally signed by Poag,
Russell@Cannabis
Date: 2026.04.14 12:14:42
-07'00'

Russell Poag
Declarant

	A	B	C	D	E	F	G	H	I
1	Personnel Role/Title	Last Name	First Name	Hourly Rate	Field Time	Research and Report Writing	Meetings	Total Hours	Total Expense
2	Lead SI	Poag	Russell	\$101.00	5	92		97	\$9,797.00
3	SSI I	Campbell	Ashtyn	\$101.00	5	5		10	\$1,010.00
4	Assisting ES	Proskey	Jonathon	\$114.00	5	5		10	\$1,140.00
5	Assisting ES	Robinson	Evan	\$114.00	5	5		10	\$1,140.00
6				Total	20	107	0	127	\$13,087.00
7									
8	Combined Personnel Services and Operating Expense								\$15,199.81
9									
10									
		Operating Expense	Count	Cost per count		Total Operating Expenses			
11									
12		State Vehicle Mileage		\$0.73		\$0.00			
13		Rental Vehicles	1	\$303.13		\$303.13			
14		Rental Vehicle Gas				\$0.00			
15		Flights	2	\$612.57		\$1,225.14			
16		Hotel Nights	2	\$224.27		\$448.54			
17		Per Diem	2	\$68.00		\$136.00			
18					Total	\$2,112.81			

Exhibit 4

Investigative Report (without attachments)

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**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. DCC26-0000102-INV

11
12 **LACC, LLC; ALFRED ABRAMIAN,**
13 **DESIGNATED RESPONSIBLE PARTY**
14 **AND OWNER**

CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF GREGORY M.
CRIBBS

15 One. [Business and Professions Code section
26031.1]

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

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

24 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance
25 Division of the Department of Cannabis Control, in this action. I was assigned to handle this case
26 on or about February 24, 2026.

27 3. Our Office's computerized case management system reflects that the following
28 persons have also performed tasks related to this matter: Gregory Cribbs, Supervising Deputy

1 Attorney General and Helen Koh, Senior Legal Analyst.

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

7 5. On April 20, 2026, I requested a billing summary for this case from the Accounting
8 Department of the DOJ. In response, on April 20, 2026, I received a document entitled "Matter
9 Time Activity by Professional Type." I hereby certify that the Matter Time Activity by
10 Professional Type, attached hereto as Exhibit A, and herein incorporated by reference, is a true
11 and correct copy of the billing summary for this matter that I received from the Accounting
12 Department. The summary includes the billing costs incurred by me, as well as other professionals
13 of the DOJ who worked on the matter; and sets forth the tasks undertaken, the amount of time
14 billed for the activity, and the billing rate by professional type. The billing summary is
15 comprehensive of the charges by the Office to the Department of Cannabis Control through April
16 20, 2026. It does not include billing for tasks performed after April 20, 2026, up to the date of
17 hearing.

18 6. Based upon the time reported through April 20, 2026, as set forth in Exhibit A, DOJ
19 has billed the Department of Cannabis Control \$5,550.76 for the time spent working on the
20 above-entitled case.

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

23
24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

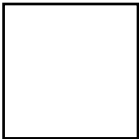
Executed on April 20, 2026, in the City of Los Angeles, California.

Gregory M. Cribbs

GREGORY M. CRIBBS
Supervising Deputy Attorney General
Declarant

LA2026800606
85668506.docx

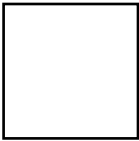
Exhibit A



Matter Time Activity By Professional Type

As of Apr 20, 2026

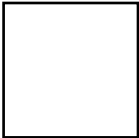
Matter ID: LA2026800606				Date Opened: 02/24/2026					
Description: LACC LLC (EDO/ACC)									
Professional Type: Attorney									
Fiscal Year: 2025									
Professional: Gregory M. Cribbs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
606076890	2/26/26	CV-CCS:290	02668	Case Evaluation/Assessment	1.75	\$228.00	\$399.00		2/28/26
606085436	3/2/26	CV-CCS:290	02668	Pleading Preparation	4.25	\$228.00	\$969.00		3/31/26
606086781	3/3/26	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		3/31/26
606089756	3/4/26	CV-CCS:290	02668	Pleading Preparation	2.25	\$228.00	\$513.00		3/31/26
606101133	3/11/26	CV-CCS:290	02668	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/26
606101136	3/11/26	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		3/31/26
606104473	3/13/26	CV-CCS:290	02668	Communication with Other Party	0.50	\$228.00	\$114.00		3/31/26
606157345	4/13/26	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
606162319	4/15/26	CV-CCS:290	02668	Evidentiary Preparation - Other	0.50	\$228.00	\$114.00		
Gregory M. Cribbs Totals:					11.50		\$2,622.00		
2025 Totals:					11.50		\$2,622.00		
Attorney Totals:					11.50		\$2,622.00		



Matter Time Activity By Professional Type

As of Apr 20, 2026

Matter ID: LA2026800606				Date Opened: 02/24/2026					
Description: LACC LLC (EDO/ACC)									
Professional Type: Paralegal									
Fiscal Year: 2025									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803460713	2/24/26	CV-CCS:290	02668	Case Management	1.50	\$213.00	\$319.50		2/28/26
803461506	2/24/26	CV-CCS:290	02668	Pleading Preparation	3.50	\$213.00	\$745.50		2/28/26
803461934	2/25/26	CV-CCS:290	02668	Pleading Preparation	0.50	\$213.00	\$106.50		2/28/26
803463583	2/26/26	CV-CCS:290	02668	Pleading Preparation	3.75	\$213.00	\$798.75		2/28/26
803469383	3/2/26	CV-CCS:290	02668	Pleading Preparation	2.00	\$213.00	\$426.00		3/31/26
803481205	3/12/26	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		3/31/26
803518622	4/13/26	CV-CCS:290	02668	Contract/Document Preparation	2.00	\$213.00	\$426.00		
803521466	4/14/26	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		
Helen Koh Totals:					13.75		\$2,928.75		
2025 Totals:					13.75		\$2,928.75		
Paralegal Totals:					13.75		\$2,928.75		
LA2026800606 Totals:					25.25		\$5,550.75		



Cost of Suit Summary

As of Apr 20, 2026

MatterID: LA2026800606	Date Opened: Feb 24, 2026	Total Legal Costs:	\$5,550.75
Description: LACC LLC (EDO/ACC)		Cost of Suit:	\$0.00
		Grand Total:	\$5,550.75

Totals include WIP time.

Rate	Hrs Wrkd		Amount
Matter Time Activity Summary			
Attorney			
<i>2025-2026</i>			
\$228.00	11.50		\$2,622.00
	Total For:	2025-2026	\$2,622.00
	Total for:	Attorney	\$2,622.00
Paralegal			
<i>2025-2026</i>			
\$213.00	13.75		\$2,928.75
	Total For:	2025-2026	\$2,928.75
	Total for:	Paralegal	\$2,928.75
Total Legal Costs			\$5,550.75

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

Exhibit 5

Investigative Report (without attachments)

INVESTIGATION REPORT

STATE OF CALIFORNIA



Department of
Cannabis Control
CALIFORNIA



CASE INFORMATION

Case Number DCC26-0000102-INV	Date Received January 13, 2026
License Number C9-0000683-LIC	Legal Business Name of Licensee or Unlicensed Party LACC, LLC
DBA CCG Delivery, Weedyy	Premises Address 1316 S Los Angeles Street, Suite B, Los Angeles, CA 90015
Business Phone Number (818) 625-7854	Author's Name Russell Poag, Special Investigator
Date of Incident January 27, 2026	Location of Incident 1316 S Los Angeles Street, Suite B, Los Angeles, CA 90015

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

Name (First, Middle, Last) Alfred Abramian	Title Designated Responsible Party (DRP)
Address (include street, city, state, and zip code) 1316 S Los Angeles Street, Suite B, Los Angeles, CA 90015	
E-mail Address AlfredTheGood@gmail.com	Phone Number (818) 667-6918

Miscellaneous Information

Vartan Karagezyan is listed as a co-owner in Accela.

Alfred Abramian is also listed as the DRP of AP & K MANAGEMENT LLC, license number C9-0000820-LIC.

SUMMARY

Department of Cannabis Control (DCC) staff conducted an inspection pursuant to a complaint. DCC staff discovered a major discrepancy in reported inventory versus on-hand inventory, as well as evidence of unrecorded sales, a licensee operating outside of their license type, and undisclosed owners, amongst other violations.



BACKGROUND

On January 6, 2023, the DCC issued a Cannabis Retailer Non-storefront License to LACC, LLC, (LACC) doing business as (DBA) LA Cannabis Club license number C9-0000683-LIC. The listed DRP was Alfred Abramian (Abramian) (**ATTACHMENT A**).

On November 21, 2024, Special Investigator (SI) Bryan Hayashida (SI Hayashida) conducted an inspection of LACC, which resulted in a Notice to Comply (NTC) being issued on December 17, 2024 (**ATTACHMENT B**). The NTC was for the following violations: Providing Trade Samples – California Code of Regulations (CCR), title 4, § 15041.4 (i), Premises Access Requirements – § 15042 (a), Premises Access Requirements – § 15042 (e), Video Surveillance System - § 15044 (h), Use of Harvest Batch Name and Package Tags - § 15048.5 (c), Delivery Vehicle Requirements - § 15417 (d), Waste Management – § 17223 (b), and Waste Management - § 17223 (c). On January 17, 2025, LACC provided a written plan and signed Table B documenting how the violations would be corrected (**ATTACHMENT C**). On January 24, 2025, SI Hayashida emailed LACC and confirmed the submitted written plan appeared to adequately address the violations described in the NTC (**ATTACHMENT D**).

From January 20 to August 15, 2025, the DCC received numerous complaints of multiple cannabis delivery businesses on Weedmaps utilizing the LACC license number. These businesses included 420Bird, Golden Leaf, Drakkar, World Class Cannabis, Element, Marrakush, and Fuzzzy Flower. When asked about LACC's affiliation with each of these businesses, Abramian responded "The mentioned Delivery route customer base was acquired to expand our delivery area." Other complaints submitted to the Department also tied LACC's license number to additional cannabis deliveries listed on Weedmaps, such as CannaSky Delivery, Orange Leaf, DNA, Weed Dash, Canna Star, Magic Stick, Canna Cruise, 606 Boys, Asgard, Weed Plug, Weedy, Star Leaf, Zhads Delivery, and Baggy Boys.

On June 15, 2025, the DCC received complaint DCC25-0006572-COMP. The complaint was from The City of Ventura and alleged cannabis deliveries by LACC within the city without local authorization. A copy of the notice issued by the City of Ventura on May 20, 2025, was included with the complaint (**ATTACHMENT E**).

On August 25, 2025, Abramian sent an email to the DCC which contained 12 Form-027s, and a request to add 31 multiple Doing-Business-As (DBA) names (**ATTACHMENT F**). The DBAs listed in the Form-027s were the following:

1. LACC DELIVERY
2. 606 Boys – ETCS, LLC DBA 606 BOYS
3. JuanaShoppe LLC- ETCS, LLC DBA JUANASHOPPE
4. Baggy Boys
5. Loki Management Group, LLC fbn Lo Key Delivery- ETCS, LLC DBA LOKEY DELIVERY
6. ETCS, LLC fbn Good Weed Co
7. ETCS, LLC fbn Kushco Delivers
8. ETCS LLC fbn Magic Buds
9. ETCS LLC fbn Cali Greens Co.
10. Kannabis
11. ETCS LLC fbn Magic Buds, ETCS LLC fbn Cali Greens Co., and Kannabis
12. The Delivery LLC – ETCS, LLC DBA THE DELIVERY
13. General Verde Organics Inc. fbn Green Buddy So Cal – ETCS, LLC DBA GB WHOLESAL
14. ETCS, LLC dba 2 Quick Delivery
15. ETCS LLC dba CCG Delivery
16. ETCS LLC dba Luv & Balance
17. ETCS LLC dba ZAZA Boyz
18. ETCS LLC dba Weed Plug
19. ETCS, LLC dba Lucky Farms Delivery
20. ETCS, LLC dba Treeup
21. JW Brands LLC dba Queen B'z Delivery – ETCS, LLC DBA QUEENB'Z DELIVERY



INVESTIGATION REPORT (continued)

22. ETCS, LLC dba OUI'DBIZZ
23. ETCS LLC dba High Desert Loves Weed
24. Synergy Mental Health LLC dba The Higher Consciousness
25. ETCS INC dba Inland Delivery
26. ETCS LLC, DBA Weed Wizard
27. ETCS LLC dba Exclusive Exotic Kingz
28. ETCS, LLC dba Blue Bird Delivery
29. The Delivery LLC dba CannaLux- ETCS, LLC DBA CANNALUX
30. The Delivery LLC fbn KRVD Services – ETCS, LLC DBA KRVD SERVICES
31. Inland Consulting LLC dba Taste – ETCS, LLC DBA TASTE

On August 27, 2025, DCC staff conducted an inspection of LACC and noted that the on-hand inventory at LACC did not match the inventory recorded in the CCTT account.

On August 27 and August 30, 2025, the DCC received complaints alleging that cannabis delivery business 606 Boys, which was displaying LACC's license number on Weedmaps, was selling contaminated or adulterated cannabis goods, making deliveries outside of permissible business hours, and selling cannabis goods in amounts over the daily purchase limits.

On September 24, 2025, the DCC emailed Abramian that only the following fictitious business name and DBA changes had been approved: new DBA: Weedyy, new fictitious business name: CCG Delivery (**ATTACHMENT G**). The DCC issued an updated license reflecting the approved names (**ATTACHMENT H**).

On September 10, 2025, the DCC received a complaint alleging that another cannabis delivery service, KushFly, was also using the license number of LACC on Weedmaps.

CASE NARRATIVE

On January 13, 2026, I, Special Investigator Russell Poag (SI Poag), was assigned investigation DCC26-0000102-INV. This investigation was pursuant to a complaint which alleged the following: a licensee operating outside of permitted business hours, selling cannabis goods not sourced from the licensed cannabis market, selling adulterated cannabis, and sales of cannabis goods in quantities over the permissible adult-use daily limits.

On January 26, 2026, I conducted an audit of LACC's METRC California Cannabis Track and Trace (CCTT) account, which included reviewing the inventory and transfers, and running a Package Adjustment Report (PAR). A package adjustment is a way for a licensee to manually adjust the quantities on individual items in the CCTT account for various reasons. The PAR will show how often a licensee has adjusted packages within their CCTT account.

During my audit, I discovered that LACC had not created any retail ledgers nor delivery sales manifests since 2024, yet between January 8 and January 26, 2026, LACC had recorded 75 separate in-person sales receipts, comprised of 273 individual items for a recorded sales total of \$4,702.41 (**ATTACHMENT I**). In CCTT, sales receipts like the ones recorded in the CCTT account of LACC are used specifically to record in-person sales. Per DCC regulations, all delivery sales, which are the only type of sales a non-storefront retailer is permitted to conduct, must have a retail ledger and delivery sales manifest recorded in the CCTT account.

While reviewing the CCTT account of LACC, I discovered that in 2025, LACC received 33 incoming transfers, comprised of 394 distinct Unique Identifiers (UIDs) for a total of 5,431 units. A UID means an alphanumeric code or designation used for reference to a specific plant and any cannabis or cannabis product derived or manufactured from that plant. The recorded wholesale price of all incoming manifests received in 2025 was \$38,427.77 (**ATTACHMENT J**). However, the only recorded sale in 2025 was on March 5, 2025, and the sale was comprised of one item with a recorded sales total of \$11 (**ATTACHMENT K**). The singular March 5, 2025, sale was also recorded as a sales receipt, indicating an in-person sale.



INVESTIGATION REPORT (continued)

I discovered that between January 5 and January 27, 2026, LACC received 11 incoming transfers, comprised of 140 distinct UIDs for a total of 2,578 units. The recorded wholesale price of all incoming manifests received from January 5 to January 27, 2026, was \$13,616.31 (**previously referenced ATTACHMENT J**).

Additionally, while reviewing the CCTT account of LACC, I discovered there were 555 active packages, meaning there were 555 distinct UIDs that were not finished nor discontinued, and had a quantity of over 0. This equaled a total of 7,736 individual units (**ATTACHMENT L**). Based on my experience and training, when a retail license has a large number of distinct UIDs or negative quantities, that can indicate that an inventory reconciliation with the licensee's CCTT account is not taking place every 30 calendar days.

On January 27, 2026, DCC Supervising Special Investigator I (SSI I) Ashtyn Campbell (SSI Campbell), Environmental Scientist (ES) Jonathan Proskey (ES Proskey), ES Evan Robinson (ES Robinson), and I, SI Russell Poag (SI Poag), conducted a site visit at LACC, LLC (LACC), C9-0000683-LIC, located at 1316 S Los Angeles Street, Suite B, Los Angeles, California (licensed premises or premises). At the time of the inspection, LACC was licensed to do the following business activities: Retailer Non-storefront. All DCC staff arrived at the premises at approximately 10:45am.

Once at the premises, I called Abramian, the DRP of LACC listed in the DCC licensing system (CLEaR), and there was no answer, so I left a voicemail. I called the other owner, Vartan Karagezyan (Karagezyan), and there was no answer. The mailbox was full, and I was unable to leave a voicemail. I then called the phone number of LACC which was listed in Google. The business line had a prerecorded message which stated, "Thank you for calling LA Cannabis Club, this is your boy Snoop. Leave a message and we'll get right back to you after we hit this blunt." I left a voice mail.

I then received a phone call from an individual identifying themselves as Joe Reed (Reed). Reed stated that Abramian had forwarded him my voice mail. I identified myself and stated I was on site to conduct an inspection. Reed stated he was the new owner of the license, and new owner paperwork had been submitted to DCC around the beginning of January 2026. Reed stated his name was William, but he went by Joe. Reed stated there were no employees on site and the only delivery driver who had keys was in Temecula, several hours away. I then told Reed I needed access the same day. Reed stated he would meet me at the premises, but he was traveling from Palm Springs, approximately an hour and forty minutes away. I told Reed I would meet him at the premises once he arrived.

While waiting for Reed to arrive, I reviewed CLEaR and did not see Reed listed as an owner of LACC, nor did I see a DCC-Form 027 adding Reed as an owner. I then searched the Secretary of State (SOS) Business Search site and discovered on May 1, 2025, William Reed had been added as a CEO to LACC, LLC (**ATTACHMENT M**).

I again searched CLEaR for the most recent DCC-Form-027 submitted to DCC and discovered Abramian had submitted a Fictitious Business name (FBN) change, including adding 35 multiple Doing-Business-As (DBA) names (**previously referenced ATTACHMENT F**). In the correspondence, DCC advised Abramian a license could only have one DBA but in addition could have multiple FBNs. Abramian replied to DCC stating he wanted to update the DBA to 'Weedyy' and 'CCG Delivery' as the only additional FBN. DCC confirmed the remaining 34 DBA names were to be disregarded. Abramian confirmed that was correct (**previously referenced ATTACHMENT G**). Upon searching the name 'Weedyy', I discovered a website for cannabis delivery in the Los Angeles area in the search results. On the Weedyy website multiple dispensary names were listed, including some names that had been on the list of 34 DBAs from the previous email to DCC, including Kushfly, Juana Shoppe, and Queen B'z Delivery. I clicked the business names and was directed to a separate website for each business. I discovered the license number for LACC, C9-0000683-LIC, was displayed on the websites for multiple businesses, including those businesses previously referenced (**ATTACHMENT N**). Based on my review of the product descriptions, each website was advertising cannabis goods not recorded in the CCTT account of LACC.



INVESTIGATION REPORT (continued)

I called the phone number listed for KushFly, and the phone was answered by a person who identified themselves as Alex Ramos (Ramos). I asked Ramos where they were located and he replied West Hollywood. I identified myself and asked if I could speak with the owner and Ramos replied that he did not know who the owner was. I asked if there was a manager I could speak with, and Ramos replied there was not one available. I then asked where all the inventory they delivered was stored, and Ramos ended the call without answering the question.

Additionally, while reviewing documents in CLEaR, I discovered a Notice from the City of Ventura Code Enforcement which had been issued to LACC on May 20, 2025 (**previously referenced ATTACHMENT E**). The notice stated LACC was allegedly in violation of conducting cannabis deliveries in the City of Ventura without local authorization.

Once Reed arrived at the premises, SSI Campbell, ES Proskey, ES Robinson, and I met him at the front entrance.

Once I entered the premises, I discovered the only inventory on site was 20 cannabis vape cartridges, which had UID tags correlating with incoming manifest number 0010187318 received in CCTT on January 23, 2026 (**ATTACHMENT O**). Neither myself, nor any other DCC staff present could locate any additional cannabis or cannabis products on the premises (**ATTACHMENT P**).

I asked Reed where the remaining cannabis goods were located, and he stated they had all been sold. I then asked Reed where these sales had been recorded, because none of cannabis goods received in January 2026 had recorded sales attached to them. Reed stated he believed the point-of-sale system was not recording sales, and I replied there were approximately 75 sales recorded in January 2026. Reed said yes, they did have sales recorded, because they had a small number of pre-existing customers who were still placing orders. I asked Reed if he had access to LACC's CCTT account and Reed replied he did not have his own account. I discovered a physical copy of manifest number 0010187318, which had been signed with a date of January 22, 2026 (**previously referenced ATTACHMENT O**). In addition to the previously referenced 20 vape cartridges, I discovered a stack of 24 UID tags which were listed on manifest 0010187318 but did not have the associated cannabis goods with them. I also discovered 6 UID tags without an accompanying manifest. I conducted a package trace in CCTT and discovered that all 6 UID tags were listed on manifest 0009536633, which had been received by LACC on September 18, 2025. The 6 UID numbers on manifest 0009536633 consisted of a total of 28 individual units. I searched the history of each UID and discovered that 16 individual units were still recorded as active in LACC's CCTT account (**ATTACHMENT Q**). I asked Reed where the 16 items that should have accompanied with the UID tags were, but Reed could not answer my question. I asked Reed where the remaining cannabis goods, a total of 758 unaccounted for items, were at. Reed stated they had been given away as samples to customers. I asked where those samples had been recorded and Reed was not able to provide an answer. I asked Reed if customers had been charged for the samples and Reed stated the customers were charged 1 cent, but he was unable to provide any receipts showing those charges.

I asked Reed to show me video of delivery drivers packing up deliveries and Reed was able to access video from the days that sales were recorded but was unable to find any footage of drivers packing up orders. Reed stated he could find them if he had more time.

I then asked Reed where the money from the deliveries was, and he replied that it was deposited at the bank. I then asked if the money from the five sales recorded on January 26, 2026, between 9:11pm and 9:12pm had been deposited and Reed stated the driver still had the money. Reed also stated the delivery driver still had a "driver kit", which included a dedicated GPS device, but the GPS was only able to provide real-time GPS data, and he could not pull any data from previous days.

Ultimately, Reed was not able to account for the missing 7,716 individual units. Reed was not able to provide any delivery logs or sales receipts for the deliveries. Reed was unable to provide any records of inventory reconciliation.



INVESTIGATION REPORT (continued)

I asked Reed about the DBA 'Weedyy' and Reed stated that Weedyy was a consultant that LACC had hired. I asked Reed why other business names which had been listed in the previously referenced DBA change email appeared on the Weedyy website using LACC's license number. Reed stated that LACC had issued a cease-and-desist to the other DBAs, and he was not sure why the license number for LACC was on the Weedyy website. I then asked Reed why LACC was using the Weedyy DBA, if Weedyy was a consultant. Reed was not able to answer my question.

I then advised Reed that I would be requesting business records from LACC and ended the inspection. Throughout my conversations with Reed, I found his responses to be so contradictory and non-responsive to the extent that I believed he was actively withholding information and lying to me.

All DCC staff left the premises at approximately 3:30pm.

On January 28, 2026, I issued a formal business records request to LACC (**ATTACHMENT R**) and included a hyperlink to a Box link. Box is a web-based file hosting and sharing service that the Department uses when files, such as videos, are requested from licensees. I requested the following:

"Please provide copies of the following documents or records associated with the LACC, LLC (C9-0000683-LIC) license no later than Friday, January 30, 2026:

- Surveillance Recordings
 - All surveillance recordings from 12:00 am on January 25, 2026, to 11:59 pm on January 27, 2026.
 - All surveillance recordings from 12:00 am to 11:59 pm on the following dates and any additional dates that any sales were packed, departed the premises, or were returned to the premises:
 - January 8, 2026
 - January 9, 2026
 - January 10, 2026
 - January 11, 2026
 - January 12, 2026
 - January 13, 2026
 - January 14, 2026
 - January 15, 2026
 - January 16, 2026
 - January 17, 2026
 - January 19, 2026
 - January 20, 2026
 - January 21, 2026
 - January 24, 2026
 - January 25, 2026
 - January 26, 2026
 - All surveillance recordings from 12:00 am to 11:59 pm on the following dates and any additional dates that incoming transfers were delivered or received:
 - January 5, 2026
 - January 6, 2026
 - January 10, 2026
 - January 13, 2026
 - January 21, 2026
 - January 22, 2026
 - January 23, 2026

Please provide copies of the following documents or records associated with the LACC, LLC (C9-0000683-LIC) license no later than Wednesday, February 4, 2026:

- All previous correspondence with representatives of the Department of Cannabis Control.



INVESTIGATION REPORT (continued)

- All Cease-and-Desist notices sent to any DBA of LACC, LLC (C9-0000683-LIC) or other business on behalf of LACC, LLC (C9-0000683-LIC).
- All contracts with any consultant business, including but not limited to the following:
 - CannaSales
 - DopeHR
- All contracts between LACC, LLC (C9-0000683-LIC) and any DBA or associated business from January 1, 2023, to the present, including but not limited to the following:
 - Weedyy
 - CCG Delivery
 - LACC Delivery
 - ETCS, LLC dba 2 Quick Delivery
 - ETCS LLC dba CCG Delivery
 - Gaia's Garden
 - JuanaShoppe LLC
 - ETCS LLC dba Luv & Balance
 - ETCS LLC dba ZAZA Boyz
 - ATOFLAVORZ
 - ETCS LLC dba Weed Plug
 - ETCS, LLC dba Lucky Farms Delivery
 - ETCS, LLC dba Treeup
 - JW Brands LLC dba Queen B'z Delivery
 - Baggy Boys
 - AES Branding LLC fbn The Cut
 - ETCS, LLC dba OUI'DBIZZ
 - ETCS LLC dba High Desert Loves Weed
 - Synergy Mental Health LLC dba The Higher Consciousness
 - KushFly Delivery
 - Loki Management Group, LLC fbn Lo Key Delivery
 - ETCS INC dba Inland Delivery
 - ETCS LLC, DBA Weed Wizard
 - ETCS LLC dba Exclusive Exotic Kingz
 - ETCS, LLC fbn Good Weed Co
 - ETCS LLC fbn Kushco Delivers
 - ETCS LLC fbn Magic Buds
 - ETCS LLC fbn Cali Greens Co.
 - ETCS, LLC dba Blue Bird Delivery
 - Kannabis
 - Weed4Less Inc.
 - The Delivery LLC
 - The Delivery LLC dba CannaLux
 - General Verde Organics Inc. fbn Green Buddy So Cal
 - The Delivery LLC fbn KRVD Services
 - Inland Consulting LLC dba Taste
 - Third Eye Vibez
 - Gas'D
 - Rush Riders Collective
- Provide the following for all individuals employed or associated with the Licensed Premises from January 01, 2023, to the present:
 - Employees full name
 - Employees date of birth
 - Employees date of hire
 - Employees date of termination (if applicable)
- Cal-Osha 30 hr. training certificate for one supervisor and one employee
- Weighmaster certificate



INVESTIGATION REPORT (continued)

- Records of inventory reconciliation from January 01, 2023, to the present.
- All bank deposits from January 01, 2025, to the present.
- Driver receipts from all deliveries from January 01, 2025, to present.
- Delivery vehicle GPS data from October 30, 2025, or 90-days prior to the date of this request
- Sales records from January 01, 2023, to the present.
- SOP's"

On January 30, 2026, I received an email from Abramian (**ATTACHMENT S**). Abramian stated that a transfer of ownership had already been submitted in May 2025, and he would be forwarding records from "DCR" as evidence. I understood "DCR" to mean the Los Angeles Department of Cannabis Regulation (DCR), the local authority for cannabis business licensure in the city of Los Angeles. Abramian continued to reference "DCR" in his email as well as direction from a name I did not recognize as someone working for the DCC, who advised Abramian that ownership changes are done at the time of renewal. Abramian attached three documents; a Purchase Agreement, signed by himself and Reed, which was dated December 2024 (**ATTACHMENT T**), a Release of Liability, signed by himself and Reed, which was dated March 2025 (**ATTACHMENT U**), and a DCC Form 27, to modify LACC's license with the DCC (**ATTACHMENT V**).

On February 2, 2026, I emailed Abramian (**ATTACHMENT W**). I stated the DCC did not have any record of an ownership change submittal for LACC, and advised Abramian of the correct process to submit the DCC-Form-027.

On February 3, 2026, I emailed Abramian (**ATTACHMENT X**). I requested surveillance video recordings for the dates I had previously requested be reuploaded as multiple files, to reduce the file size. I then extended the deadline to provide surveillance video recordings to 5:00 pm on February 6, 2026.

On February 5, 2026, I received a forwarded email from Jana Cahn (Cahn) regarding their correspondence with the DCC regarding a new license application (**ATTACHMENT Y**). I recognized Cahn's name from a business record which was uploaded by LACC on February 4, 2026 (**ATTACHMENT Z**). The record was a Position Offer to Cahn, which stated she was being offered the position of Director of Operations with a start date of January 31, 2026. While reviewing the email Cahn had forwarded to me, I noted that in the email to the DCC, Cahn stated that in May 2025, they submitted an ownership modification to add Cahn as an owner of LACC to DCR. That date was not consistent with the position offer that had been uploaded by LACC.

As of February 5, 2026, LACC had provided some of the requested records, but not all. Video recordings for most dates was incomplete, video for some dates had not been uploaded, and most notably, the sales receipts which LACC provided appeared dubious upon examination (**ATTACHMENT AA**). I attempted to call several of the phone numbers recorded for delivery customers: three were out of service, three were wrong numbers, one was not accepting incoming calls, and one was a prerecorded line for an unnamed travel agency. Additionally, the email addresses recorded for delivery customers were all "user####@gmail.com", for example user8074@gmail, user6758@gmail, user8944@gmail, etc. There were no email addresses listed in a different format or style. I looked up several of the physical addresses listed for delivery sales on Google Maps and Landvision, and none of the addresses were legitimate physical addresses to which cannabis products are permitted to be delivered (**ATTACHMENT BB**).

LACC continued to upload records over the course of several days.

On February 10, 2026, I emailed Abramian (**ATTACHMENT CC**). I advised Abramian several files that had been uploaded were not compatible with my work issued computer. I requested that Abramian re-upload the files in a format that was compatible with Windows operating systems no later than 5:00 pm on February 12, 2026.

LACC continued to upload surveillance videos and business records until February 13, 2026. LACC failed to provide complete video surveillance recordings for January 9, 12, 22, and 25, 2026, previous correspondence with the DCC, contracts between LACC and any other business entity, Cal-OSHA training certificate,



INVESTIGATION REPORT (continued)

weighmaster certificate, records of inventory reconciliation, bank deposits, and GPS data for all delivery vehicles.

While reviewing the documents that had been provided by LACC, I discovered the following:

- None of customer names recorded on the sales receipts for January 2026 initially provided by LACC were recorded on the sales receipts for September to December 2025. If Reed's statement during the inspection that LACC was exclusively selling to pre-existing customers was truthful, then that increases the dubious nature of the sales receipts for January 2026 (**ATTACHMENT DD**).
- A file named "Meadow Org 1569 - Orders - 1_1_26 - 1_31_26", which contained sales records for January 2026 appeared to be exported from the Meadow Point of Sales system (POS) (**ATTACHMENT EE**). The sales receipts recorded on this file contradict and do not match the sales receipts for January 2026 that were initially provided by LACC. The contradictory nature of multiple sets of sales receipts casts further doubt on the provenance and veracity of the records provided by LACC.
- Sales receipts dated from September 17, 2025, to December 31, 2025, were not recorded in the CCTT account of LACC (**ATTACHMENT FF**). The sales receipts for 2025 comprised of 715 individual items for a total of \$134,873.34 (**ATTACHMENT GG**). The sales receipts from 2025 appeared to contradict gross revenue documentation uploaded by Abramian to CLaR on December 22, 2025, which indicated \$0 of sales between July 1, 2025, and September 30, 2025, had been reported to the California Department of Tax and Fee Administration (CDTFA) (**ATTACHMENT HH**).
- Cease and Desist letters to Cannasales, 606 Boyz, and Cannasales/Drakkar/Element were uploaded. The letters were pdf files that stated they had been emailed, but no evidence of email was included. The letters were dated July 14, 2025, June 1, 2025, and July 14, 2025, respectively (**ATTACHMENT II**).
- The Standard Operating Procedures (SOP) provided by LACC (**ATTACHMENT JJ**) included "Comp Log Procedures" on pages 9 and 10. According to the SOP, the "Comp Log" was to track complimentary cannabis goods and stated, "each comp transaction is recorded in the POS system and mirrored in METRC as a zero-dollar transaction." The presence of this section in the SOP and Reed's statement during the inspection about "customer samples" indicates that LACC was providing cannabis goods for no charge to consumers.
- The previously referenced SOP document references "customer facing areas" on pages 5, 6, and 11, including a reference to a "front lobby", "customer lobby", and "public access points". This indicates that portions of LACC's premises were open to the public, despite LACC being a Non-storefront retailer.
- I reviewed video surveillance recordings of multiple dates and discovered the following:
 - I reviewed video for January 5, through January 20, 2025, and did not see any cannabis goods stored in the storage area of the premises.
 - On January 20, 2025, I observed Reed and 4 unknown individuals enter the premises and appear to clean up, organize files, and install office equipment. I observed Reed open the safe in the storage area and remove 3 boxes labeled 'Raw Garden', a cannabis goods brand I recognize from inspections at other licensees. Reed then placed them off camera, in an area that contained a cannabis waste container during my inspection.



INVESTIGATION REPORT (continued)

WITNESS LIST

Witness #1

- Name: Russell Poag
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (279) 220-7228
- E-mail: Russell.Poag@cannabis.ca.gov

Witness #2

- Name: Ashtyn Campbell
- Title/Position: Supervising Special Investigator I
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (916) 584-4117
- E-mail: Ashtyn.Campbell@cannabis.ca.gov

Witness #3

- Name: Jonathon Proskey
- Title/Position: Environmental Scientist
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone:
- E-mail: Jonathon.Proskey@cannabis.ca.gov


Witness #4

- Name: Evan Robinson
- Title/Position: Environmental Scientist
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone:
- E-mail: Evan.Robinson@cannabis.ca.gov

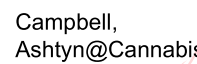
Witness #4

- Name: William "Joe" Reed
- Title/Position:
- Address:
- Phone: 760-275-9090
- E-mail: ThatGuyJoeReed@gmail.com

PREPARER

Name	Russell Poag	Title	Special Investigator
Signature		Digitally signed by Poag, Russell@Cannabis Date: 2026.03.02 15:58:45 -08'00'	

REVIEWER

Name	Ashtyn Campbell	Title	Supervising Special Investigator I
Signature		Digitally signed by Campbell, Ashtyn@Cannabis Date: 2026.03.02 16:08:20 -08'00'	Date 3/2/26

LIST OF ATTACHMENTS

- A DCC License issued 1/6/2023
- B NTC issued 12/17/2024



INVESTIGATION REPORT (continued)

- C LACC NTC corrections 1/17/2025
- D DCC NTC confirmation 1/24/2025
- E 2025.05.20_6572_Notice from City of Ventura
- F 2025.08.25_Email from LA Cannabis Club (LACC) Form DCC LIC 027
- G 2025.09.24_Email to RE LA Cannabis Club (LACC) Form DCC LIC 027
- H Updated LACC license 2025.12.22
- I 2025-2026 Delivery Sales Manifests and Retail Sales
- J Transfer Manifests 2025-2026
- K 2025-2026_All SalesReceipts_C9-0000683-LIC
- L 2026.01.26_Active Packages_C9-0000683-LIC
- M SoS Website Info LACC LLC
- N Weedyy Site DBAs
- O 2026.01.27_Photos Inventory LACC
- P 2026.01.27_Photos Interior LACC
- Q Package Tags and Manifest 0009536633
- R 2026.01.28 Email_Record Rqst
- S 2026.01.30 Email_From Abramian
- T 2026.01.30 Email_laccpurchasedec2024
- U 2026.01.30 Email_Release of Liability
- V 2026.01.30 Email_dcc_lic_027
- W 2026.02.02 Email_To LACC
- X 2026.02.03 Email_To LACC
- Y 2026.02.05 Email_From Cahn
- Z Jana Cahn Offer Letter
- AA January 2026 Sales Receipts - Initial Upload 2026.02.04
- BB January 2026 Address LandVision Screenshot



INVESTIGATION REPORT (continued)

CC 2026.02.10 Email_To LACC

DD 2025 and 2026 Sales Names Alphabetical

EE January 2026 Sales-Different Names_Uploaded 2026.02.12

FF 2025 Sales Receipts - Not in CCTT_uploaded 2026.02.12

GG 2025 Daily Summary Totals - Not in CCTT_uploaded 2026.02.12

HH 2025.12.22_GrossRev_3rdq2025cdtfa

II Cease and Desist Combined

JJ LACC Master SOP (Updated)

PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: LACC, LLC DBA Weedyy and LA Cannabis Club;
FBN CCG Delivery
DCC Case No. DCC26-0000102-INV
License No. C9-0000683-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 May 8, 2026, 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.

LACC, LLC DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
Alfred Abramian, DRP/Owner
1316 S. Los Angeles St., Ste. B
Los Angeles, CA 90015
Certified Mail No. 7022 1670 0001 3411 8061
alfredthegood@gmail.com

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

Alfred Abramian, DRP/Owner
LACC, LLC DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
10031 Mason Ave.
Chatsworth, CA 91311
Certified Mail No. 7022 1670 0001 3411 8078
alfredthegood@gmail.com

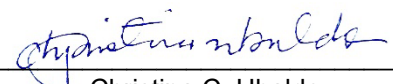
Gregory M. Cribbs (email only)
Supervising Deputy Attorney General
Cannabis Control Section
Office of Attorney General
Gregory.Cribbs@doj.ca.gov

Vartan Karagezian, Owner
LACC, LLC DBA Weedyy and LA Cannabis Club
FBN CCG Delivery
8010 Hollywood Way, #215
Sun Valley, CA 91352
Certified Mail No. 7022 1670 0001 3411 8054
vitokmed@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 May 8, 2026, at Rancho Cordova, California.



Christina C. Ubaldo