



May 12, 2026

VIA EMAIL ONLY

Vampa Oil, LLC  
Patrick Kalashyan, DRP/Owner  
patrick@goldengaminggroup.com

Lisa Selan, Esq.  
Selan Law Firm  
lisa@selanlaw.com

Re: Vampa Oil, LLC - Case No. DCC26-0000297-INV  
Order Adopting Stipulated Settlement and Order as Final Decision

Dear Mr. Kalashyan and Ms. Selan:

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

The Department's Order and Final Decision will be effective today, May 12, 2026. Pursuant to this Final Decision and its stipulated settlement, Vampa Oil, LLC has waived any right to reconsideration or appeal in this matter and to receive a copy of the Decision and Order via certified, registered, or first-class mail.

Sincerely,

Douglas Smurr  
Assistant General Counsel

Enclosure

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

In the Matter of the Accusation Against:	)	CASE NO. DCC26-0000297-INV
	)	
<b>VAMPA OIL, LLC;</b> <b>PATRICK KALASHYAN, DRP/OWNER;</b> <b>OGANES SUDZHIAN, OWNER</b>	)	<b>ORDER ADOPTING STIPULATED          SETTLEMENT AND ORDER AS          FINAL DECISION</b>
	)	
3412 & 3416 Emery St. Los Angeles, CA 90023	)	
	)	
Cannabis Distributor License No. C11-0000602-LIC	)	
	)	
Cannabis Distributor License No. C11-0002030-LIC	)	
	)	
Cannabis Manufacturer-Type 6 License No. DCC-10003597	)	
	)	
Cannabis Manufacturer-Type N License No. DCC-10005103	)	
	)	
Respondent.	)	

Pursuant to Government Code section 11415.60, the Department of Cannabis Control hereby adopts the attached Stipulated Settlement For Revocation of Licenses and Order as its Final Decision in this matter.

This Order and Final Decision shall become effective on May 12, 2026.

IT IS SO ORDERED, May 12, 2026.

Douglas Smurr  
Assistant General Counsel  
FOR THE DEPARTMENT OF CANNABIS CONTROL

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

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

10 In the Matter of the Accusation Against:  
11 **VAMPA OIL, LLC**  
**PATRICK KALASHYAN, DRP/OWNER**  
12 **3412 & 3416 Emery St.**  
**Los Angeles, CA 90023**  
13 **Cannabis Distributor License**  
14 **No. C11-0000602-LIC**  
15 **Cannabis Distributor License**  
16 **No. C11-0002030-LIC**  
17 **Cannabis Manufacturer - Type 6 License**  
**No. DCC-10003597**  
18 **Cannabis Manufacturer - Type N License**  
**No. DCC-10005103**

Case No. DCC26-0000297-INV

**STIPULATED SETTLEMENT FOR  
REVOCATION OF LICENSES AND  
ORDER**

19 Respondent.  
20

21  
22 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
23 entitled proceedings that the following matters are true:

24 **PARTIES**

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



**ADVISEMENT AND WAIVERS**

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2 9. Respondent, through its Authorized Representative, has carefully read, fully  
3 discussed with counsel, and understands the charges and allegations in Accusation  
4 No. DCC26-0000297-INV. Respondent, through its Authorized Representative, has also  
5 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
6 Settlement for Revocation of Licenses and Order.

7 10. Respondent, through its Authorized Representative, is fully aware of its legal rights in  
8 this matter, including the right to a hearing on the charges and allegations in the Accusation; the  
9 right to confront and cross-examine the witnesses against them; the right to present evidence and  
10 to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of  
11 witnesses and the production of documents; the right to reconsideration and court review of an  
12 adverse decision; and all other rights accorded by the California Administrative Procedure Act  
13 and other applicable laws.

14 11. Respondent, through its Authorized Representative, is fully aware of its legal rights to  
15 receive a copy of the Decision and Order via certified, registered, or first-class mail. Respondent  
16 agrees to receive a copy of the Decision and Order in this matter via email at the following email  
17 addresses: [lisa@selanlaw.com](mailto:lisa@selanlaw.com).

18 12. Respondent, through its Authorized Representative, voluntarily, knowingly, and  
19 intelligently waives and gives up each and every right set forth above.

**CULPABILITY**

20  
21 13. Respondent through its Authorized Representative admits the truth of each and every  
22 charge and allegation in Accusation No. DCC26-0000297-INV.

23 14. Respondent, through its Authorized Representative, agrees that Cannabis Distributor  
24 License No. C11-0000602-LIC, Cannabis Distributor License No. C11-0002030-LIC, Cannabis  
25 Manufacturer - Type 6 License No. DCC-10003597, and Cannabis Manufacturer - Type N  
26 License No. DCC-10005103 are each separately subject to revocation and agrees to be bound by  
27 the Department's imposition of discipline as set forth in the Decision and Order below.

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1 otherwise changed except by a writing executed by an authorized representative of each of the  
2 parties.

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

6 **DISCIPLINARY ORDER**

7 **1. WITHDRAWAL OF APPEAL.** Respondent's appeal of Accusation  
8 No. DCC26-0000297-INV and request for administrative hearing are deemed withdrawn and any  
9 further appeal is waived.

10 **2. LICENSE REVOCATIONS.** Respondent's Cannabis Distributor License  
11 No. C11-0000602-LIC, Cannabis Distributor License No. C11-0002030-LIC, Cannabis  
12 Manufacturer - Type 6 License No. DCC-10003597, and Cannabis Manufacturer - Type N  
13 License No. DCC-10005103 are each revoked as of the effective date of the Decision and Order.  
14 The revocation of Respondent's Cannabis Distributor License No. C11-0000602-LIC, Cannabis  
15 Distributor License No. C11-0002030-LIC, Cannabis Manufacturer - Type 6 License No. DCC-  
16 10003597, and Cannabis Manufacturer - Type N License No. DCC-10005103 shall constitute the  
17 imposition of discipline against Respondent. This stipulation constitutes a record of the discipline  
18 and shall become a part of Respondent's license history with the Department.

19 **3. PAYMENT OF FINE.** Respondent and DRP/Owner Patrick Kalashyan shall pay  
20 the Department an administrative fine in the amount of thirty-two thousand dollars (\$32,000)  
21 regarding the causes for discipline set forth in Accusation No. DCC26-0000297-INV. Payment  
22 of the administrative fine will be automatically suspended until such time as either Respondent or  
23 DRP/Owner Patrick Kalashyan apply for reinstatement of any of the revoked licenses or apply for  
24 a new commercial cannabis license or an ownership interest in a new commercial cannabis  
25 license with the Department. Respondent or DRP/Owner Patrick Kalashyan shall pay to the  
26 Department the administrative fine within (15) days of applying for reinstatement of any of the  
27 revoked licenses, or for a new commercial cannabis license, or for ownership interest in a  
28 commercial cannabis license with the Department.

1           **4. PAYMENT OF COSTS OF ENFORCEMENT.** Respondent and DRP/Owner  
 2 Patrick Kalashyan shall pay the Department’s costs of enforcement for Case  
 3 No. DCC26-0000297-INV, in the amount of thirty-three thousand six hundred sixty-one dollars  
 4 and seventy-five (\$33,661.75). Payment of the costs of enforcement will be automatically  
 5 suspended until such time as either Respondent or DRP/Owner Patrick Kalashyan apply for  
 6 reinstatement of any of the revoked licenses or applies for a new commercial cannabis license or  
 7 an ownership interest in a new commercial cannabis license with the Department. Respondent or  
 8 DRP/Owner Patrick Kalashyan shall pay to the Department the costs of enforcement within (15)  
 9 days of applying for reinstatement of any of the revoked licenses, or for a new commercial  
 10 cannabis license, or for ownership interest in a commercial cannabis license with the Department.

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

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

By FedEx or UPS:  
 Department of Cannabis Control  
 Attn: Cashiers  
 2920 Kilgore Road  
 Rancho Cordova, CA 95670-9106

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

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**ACCEPTANCE**

I have carefully read the above Stipulated Settlement for Revocation of License and Order and have fully discussed it with my attorney, Lisa Selan. I understand the stipulation and the effect it will have on my Cannabis Distributor License No. C11-0000602-LIC, Cannabis Distributor License No. C11-0002030-LIC, Cannabis Manufacturer - Type 6 License No. DCC-10003597, and Cannabis Manufacturer - Type N License No. DCC-10005103. I enter into this Stipulated Settlement for Revocation of Licenses and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department of Cannabis Control.

DATED: 4/22/2026

DocuSigned by:

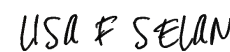


VAMPA OIL, LLC,  
PATRICK KALASHYAN,  
DRP/OWNER/AUTHORIZED REPRESENTATIVE  
*Respondent*

I have read and fully discussed with Respondent Vampa Oil, LLC, and its Authorized Representative, the terms and conditions and other matters contained in the above Stipulated Settlement for Revocation of Licenses and Order. I approve its form and content.

DATED: 4/22/2026

DocuSigned by:



LISA SELAN  
SELAN LAW FIRM  
*Attorney for Respondent*

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**ENDORSEMENT**

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

DATED: April 22, 2026

Respectfully submitted,

ROB BONTA  
Attorney General of California



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

LA2026800968

**Exhibit A**

**Accusation No. DCC26-0000297-INV**

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

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

10  
 11 In the Matter of the Accusation Against:

Case No. DCC26-0000297-INV

12 **VAMPA OIL, LLC**  
**PATRICK KALASHYAN, DRP/OWNER**  
 13 **3412 & 3416 Emery St.**  
**Los Angeles, CA 90023**

**ACCUSATION**

14 **Cannabis Distributor License**  
 15 **No. C11-0000602-LIC**

16 **Cannabis Distributor License**  
 17 **No. C11-0002030-LIC**

18 **Cannabis Manufacturer - Type 6 License**  
 19 **No. DCC-10003597**

20 **Cannabis Manufacturer - Type N License**  
 21 **No. DCC-10005103**

Respondent.

22 **PARTIES**

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

26 2. On or about July 1, 2019, the Department issued Cannabis Distributor License  
 27 No. C11-0000602-LIC (License 0602) to Vampa Oil LLC (Respondent) with Patrick Kalashyan,  
 28 Designated Responsible Party and Owner (DRP/Owner Kalashyan). The Cannabis Distributor

1 License was in full force and effect at all times relevant to the charges brought herein and will  
2 expire on June 30, 2026, unless renewed.

3 3. On or about August 5, 2025, the Department issued Cannabis Distributor License  
4 No. C11-0002030-LIC (License 2030) to Respondent with DRP/Owner Kalashyan. The  
5 Cannabis Distributor License was in full force and effect at all times relevant to the charges  
6 brought herein and will expire on August 5, 2026, unless renewed.

7 4. On or about July 1, 2019, the Department issued Cannabis Manufacturer - Type 6  
8 License No. DCC-10003597 (License 3597) to Respondent with DRP/Owner Kalashyan,  
9 DRP/Owner. The Cannabis Manufacturer - Type 6 License was in full force and effect at all  
10 times relevant to the charges brought herein and will expire on July 1, 2026, unless renewed.

11 5. On or about September 9, 2025, the Department issued Cannabis Manufacturer -  
12 Type N License No. DCC-10005103 (License 5103) to Respondent with DRP/Owner Kalashyan.  
13 The Cannabis Manufacturer - Type N License was in full force and effect at all times relevant to  
14 the charges brought herein and will expire on September 9, 2026, unless renewed.

15 **PROCEDURAL HISTORY**

16 6. The Department issued an Emergency Decision and Order (EDO), pursuant to  
17 California Code of Regulations, title 4, section 17815, that was served on Respondent on March  
18 24, 2026, and was effective the same day at 5:00 p.m. The EDO suspended Respondent's  
19 licenses and ordered Respondent to cease all commercial cannabis activity. The time to initiate  
20 adjudicative proceedings is within 10 days after the issuance or effective date of the EDO, or in  
21 this case by or on April 3, 2026.

22 **JURISDICTION**

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

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1           8.    Section 26010 of the Code states:

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

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

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

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

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

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

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

20           12.   Section 26031 of the Code states:

21                   (a) The department may suspend, revoke, place on probation with terms and  
22                   conditions, or otherwise discipline licenses issued by the department and fine a  
23                   licensee, after proper notice and hearing to the licensee, except as provided in Section  
24                   26031.01, if the licensee is found to have committed any of the acts or omissions  
25                   constituting grounds for disciplinary action. The disciplinary proceedings under this  
26                   chapter shall be conducted in accordance with Chapter 5 (commencing with Section  
27                   11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director  
28                   shall have all the powers granted therein.

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

                  (c) The department may take disciplinary action against a licensee for any  
                  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  
                  engaged in commercial cannabis activity.

                  (d) The suspension or expiration of a license issued by the department, or its  
                  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,

1 during any period in which it may be renewed, restored, reissued, or reinstated,  
2 deprive the department of its authority to institute or continue a disciplinary  
3 proceeding against the licensee upon any ground provided by law or to enter an order  
4 suspending or revoking the license or otherwise taking disciplinary action against the  
5 licensee on any such ground.

6 13. Section 26034 of the Code states:

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

15 **STATUTORY PROVISIONS**

16 14. Section 26030 of the Code states, in part:

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

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

21 ...

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

24 ...

25 15. Section 26039.3 of the Code states, in part:

26 (a) If the department finds or has probable cause to believe that cannabis or a  
27 cannabis product is adulterated or misbranded within the meaning of this division, or the  
28 sale of the cannabis or cannabis product would be in violation of this division, the  
department shall affix to the cannabis or cannabis product, or component thereof, a tag or  
other appropriate marking. The department shall give notice that the cannabis or cannabis  
product is, or is suspected of being, adulterated or misbranded, or the sale of the cannabis or  
cannabis product would be in violation of this division and has been embargoed and that the  
cannabis or cannabis product shall not be removed or disposed of by sale or otherwise until  
permission for removal or disposal is given by the department or a court.

(b) (1) It is unlawful to remove, sell, or dispose of embargoed cannabis or an  
embargoed cannabis product without written permission of the department or a court. The  
removal, sale, or disposal of each item of embargoed cannabis or cannabis product without  
written permission of the department constitutes a violation of this subdivision. A violation  
of this subdivision is subject to a citation and fine of not more than ten thousand dollars  
(\$10,000). . .

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- 16. Section 26039.5 of the Code states, in part:
  - (a) Cannabis or a cannabis product is misbranded if it is any of the following:
    - ...
    - (3) Its labeling is false or misleading in any particular.
    - (4) Its labeling or packaging does not conform to the requirements of Section 26120 or any other labeling or packaging requirement established pursuant to this division.
  - (b) It is unlawful to cultivate, process, manufacture, sell, deliver, hold, or offer for sale cannabis or a cannabis product that is misbranded.
  - (c) It is unlawful to misbrand cannabis or a cannabis product.
  - (d) It is unlawful to receive in commerce cannabis or a cannabis product that is misbranded or to distribute, deliver, or offer for delivery any such cannabis or cannabis product.

17. Section 26070.2 of the Code states, in part:  
 A person shall not sell, offer, or provide a product in the state that is any of the following:

- ...
- (e) A cannabis product manufactured outside the licensed market.

**REGULATORY PROVISIONS**

- 18. Title 4 of the California Code of Regulations, section 15000.3, states, in part:
  - ...
  - (d) Licensees shall ensure that the Department has immediate access to their licensed premises. If the Department is denied access to a licensee's premises for any reason, the licensee shall be held responsible and subject to discipline. If the Department is denied access to one licensee's premises because of another licensee's refusal to grant access when the only access to one licensed premises is through another licensed premises, all licensees shall be held responsible and subject to discipline.
  - ...

- 19. Title 4 of the California Code of Regulations, section 15037, states:
  - (a) Licensees must keep and maintain records in connection with the licensed commercial cannabis business. Records must be kept for at least seven years from the date of creation, unless a shorter time is specified. Records include, but are not limited to:
    - (1) Financial records including, but not limited to, bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration (formerly Board of Equalization) under title 18, California Code of Regulations, sections 1698 and 4901.

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(2) Personnel records, including each employee's full name, Social Security number or individual taxpayer identification number, date employment begins, and date of termination of employment, if applicable.

(3) Training records including, but not limited to, the content of the training provided and the names of the employees who received the training.

(4) Contracts regarding commercial cannabis activity.

(5) Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity.

(6) All other documents prepared or executed by an owner or their employees or assignees in connection with the licensed commercial cannabis business.

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

(b) Records must be kept in a manner that allows the records to be produced for the Department in either hard-copy or electronic form.

(c) Records must be legible and accurate. No person may intentionally misrepresent or falsify records.

(d) Records must be stored in a secured area where the records are protected from debris, moisture, contamination, hazardous waste, and theft.

20. Title 4 of the California Code of Regulations, section 15044, states:

(a) Each licensed premises shall have a digital video surveillance system with a minimum camera resolution of 1280 x 720 pixels on the licensed premises. This requirement does not apply to a licensed premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness premises.

(b) The video surveillance system shall at all times be able to effectively and clearly record images of the area under surveillance.

(c) Each camera shall be permanently mounted and in a fixed location. Each camera shall be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises, and allows for the clear and certain identification of any person and activities in all areas required to be filmed under subsection (d).

(d) Areas that shall be recorded on the video surveillance system include the following:

(1) Areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises;

(2) Limited-access areas;

(3) Security rooms;

(4) Areas storing a surveillance-system storage device with at least one camera recording the access points to the secured surveillance recording area; and

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(5) Entrances and exits to the licensed premises, which shall be recorded from both indoor and outdoor vantage points.

(e) Licensed retailers and licensed microbusinesses authorized to engage in retail sales shall also record point-of-sale areas and areas where cannabis goods are displayed for sale on the video surveillance system. At each point-of-sale location, camera placement must allow for the recording of the facial features of any person purchasing or selling cannabis goods, or any person in the retail area, with sufficient clarity to determine identity.

(f) Cameras shall record continuously 24 hours per day and at a minimum of 15 frames per second (FPS).

(g) The physical media or storage device on which surveillance recordings are stored shall be secured in a manner to protect the recording from tampering or theft.

(h) Surveillance recordings shall be kept for a minimum of 90 calendar days.

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

(j) Recorded images shall clearly and accurately display the time and date. Time is to be measured in accordance with the standards issued by the United States National Institute of Standards and Technology. The displayed date and time shall not cover the view of recorded images in a manner that prevents the ready identification of any person or activity in the captured image.

(k) The video surveillance system shall be equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the video surveillance system or video surveillance-system storage device.

(l) If multiple licensed premises are contained within the same building or on the same parcel of land, a single video surveillance system covering the entire building or parcel of land may be used by all of the licensees if all licensees have immediate access to the surveillance recordings to produce them pursuant to subsection (i). All licensees sharing a video surveillance system shall be held responsible and subject to discipline for any violations of the video surveillance requirements.

(m) Notwithstanding subsection (a), a licensed distributor transport only licensee engaged in self-distribution whose premises is on the same parcel of land as their licensed cultivation premises shall not be required to comply with the provisions of this section.

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

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

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

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

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

22. Title 4 of the California Code of Regulations, section 15048.5, states in part:

...

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

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

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

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

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

- (1) Receipt of cannabis or cannabis products.
- (2) Rejection of transferred cannabis or cannabis products.
- (3) Manufacturing of cannabis or cannabis products.
- (4) Use of cannabis or cannabis product for internal quality control testing or product research and development.
- (5) Destruction or disposal of cannabis or cannabis products.
- (6) Packaging or repackaging of cannabis or cannabis products, except that cultivation licensees shall comply with section 15049.1(b)(5).
- (7) Laboratory testing, including testing results.
- (8) Sale or donation of cannabis or cannabis products.

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

- 3 (1) The type of cannabis or cannabis products.  
4 (2) The weight, volume, or count of the cannabis or cannabis products.  
5 (3) The date of activity.  
6 (4) The UID assigned to the cannabis or cannabis products.  
7 (5) The brand name of the cannabis goods.

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

- 10 (A) The name of the employee performing the destruction or disposal;  
11 (B) The reason for destruction or disposal; and  
12 (C) The method of disposal.

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

16 (e) If a licensee rejects a partial shipment of cannabis goods pursuant to section  
17 15052.1(b), the licensee shall record the partial rejection in the track and trace system.

18 24. Title 4 of the California Code of Regulations, section 15309, states:

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

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

- 24 (1) The batch is being held in storage for another licensee;  
25 (2) The batch is awaiting sampling for regulatory compliance testing;  
26 (3) The batch has been sampled and is awaiting regulatory compliance testing results;  
27 (4) The batch has passed regulatory compliance testing;  
28 (5) The batch has failed regulatory compliance testing and is awaiting approval for  
remediation;

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

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

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

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

- (1) Regulatory compliance testing and sampling;
- (2) Sale of cannabis or cannabis products to a licensee;
- (3) Destruction or disposal of cannabis or cannabis products; and
- (4) Any other activity, as required pursuant to this division, or by the Department.

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

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

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

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

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

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

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

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

26. Title 4 of the California Code of Regulations, section 17213, states:

(a) A licensed manufacturer shall implement and maintain the following manufacturing procedures that ensure cannabis product quality:

(1) A product quality plan, as described in section 17214;

(2) Master manufacturing protocols, as described in section 17215, for each unique formulation of cannabis product manufactured to ensure only intended components are included and that the cannabis product is packaged and labeled in accordance with product specifications and this division; and

1 (3) Batch production records, as described in section 17216, to document the  
2 production process and, if needed, to verify that the established procedures, including the  
preventive measures and master manufacturing protocol, were implemented correctly.

3 (b) All manufacturing records and procedures shall be in writing and are subject to  
4 inspection by the Department, its inspectors and agents.

5 27. Title 4 of the California Code of Regulations, section 17214, states:

6 (a) A licensed manufacturer shall establish and implement a written product quality  
7 plan for each type of product manufactured at the premises. The product quality plan shall  
8 address the hazards associated with the premises or the manufacturing process that, if  
not properly mitigated, may cause the product to be adulterated or misbranded, or may  
cause the product to fail laboratory testing or quality assurance review.

9 (b) To create the product quality plan, the licensed manufacturer shall conduct a  
10 comprehensive assessment of the overall manufacturing process, as follows:

11 (1) Identify each step from component intake through transfer of product from the  
premises;

12 (2) Evaluate the potential risks associated with each step;

13 (3) Identify the preventive measures that shall be taken to mitigate the potential risks  
14 identified;

15 (4) Identify the methods to evaluate and monitor the effectiveness of the preventive  
measures; and

16 (5) Identify any action to take if a preventive measure was unsuccessful.

17 (c) The licensed manufacturer shall evaluate the following potential risks to cannabis  
18 product quality that could be introduced during manufacturing operations:

19 (1) Biological hazards, including microbiological hazards;

20 (2) Chemical hazards, including radiological hazards, pesticide contamination,  
solvent or other residue, natural toxins, decomposition, or allergens;

21 (3) Physical hazards, such as stone, glass, metal fragments, hair, or insects; and (4)  
22 Process failures that may lead to product contamination, allergen cross-contact,  
packaging errors, labeling errors, or other errors affecting cannabis product quality.

23 (d) The licensed manufacturer shall identify and implement the preventive measure(s)  
24 necessary to mitigate each potential risk identified pursuant to subsection (c). Examples  
of preventive measures include, but are not limited to:

25 (1) Cleaning and sanitizing of equipment and utensils to mitigate against risk of  
26 microbiological hazards;

27 (2) Conducting in-house testing of raw cannabis to mitigate against the risk of  
pesticide contamination;

28 (3) Establishing an allergen control program to ensure that allergen cross-contact does

1 not occur between product types; and

2 (4) Implementing procedures to ensure homogeneity of cannabinoids into a cannabis  
3 product to mitigate against the risk of a non-homogeneous product.

4 (e) The licensed manufacturer shall identify and implement methods to evaluate and  
5 monitor the effectiveness of the preventive measures in mitigating the potential risks  
6 identified in subsection (c). Methods for evaluation and monitoring of preventive  
7 measures include, but are not limited to, the following:

8 (1) Review of test results conducted to determine contamination such as pesticide  
9 residue;

10 (2) Maintaining and reviewing cleaning, sanitizing, or maintenance logs to verify  
11 such actions have been taken;

12 (3) Conducting environmental testing to determine if equipment or utensils are  
13 contaminated with pathogens; and

14 (4) Monitoring the temperature of raw materials that need to be held below 41  
15 degrees Fahrenheit to prevent microbial contamination.

16 (f) The licensed manufacturer shall identify actions to be taken if the evaluation and  
17 monitoring of the preventive measure indicates that a risk was not properly mitigated.  
18 The corrective action shall be specific to the type of product under evaluation and the  
19 specific risk to be mitigated. Examples of corrective actions include, but are not limited to:

20 (1) Destruction of product components or finished cannabis product;

21 (2) Further manufacturing of cannabis extract to remove impurities; and

22 (g) The licensed manufacturer shall maintain the product quality plans and  
23 documentation of preventive measures, monitoring results, and corrective actions and  
24 make the records available to the Department upon the Department's request, including  
25 during the Department's onsite inspection of the premises. Nothing in this chapter  
26 requires the disclosure of product quality plans other than to the Department and its  
27 inspectors and agents. The licensed manufacturer may consider the product quality plan  
28 subject to trade secret protection.

(3) Reworking the unfinished product to further homogenize the cannabinoids.

28. Title 4 of the California Code of Regulations, section 17215, states:

(a) A licensed manufacturer shall establish and follow a written master manufacturing  
protocol for each unique formulation of cannabis product manufactured, and for each  
batch size, in order to mitigate the potential for adulteration through incorporation of  
incorrect amounts of cannabinoids, unintended ingredients, or hazards identified in the  
product quality plan; the potential for misbranding through incorporation of ingredients  
not identified on the label or mislabeling of the product; and to ensure uniformity in  
finished batches and across all batches produced.

(b) The master manufacturing protocol shall include:

(1) The name and intended cannabinoid concentration(s) of the cannabis product to be

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manufactured;

(2) A complete list of components to be used;

(3) The weight or measure of each component to be used. The master manufacturing protocol for any given product may include the ability to adjust the weight or measure of cannabinoid-containing ingredients in order to account for the variability of cannabinoid content in harvest batches;

(4) The identity and weight or measure of each ingredient that will be declared on the ingredients list of the cannabis product;

(5) The expected yield of the finished cannabis product, based upon the quantity of components or packaging to be used in the absence of any loss or error in actual production, and the maximum and minimum percentages of expected yield beyond which a deviation investigation of a batch will be necessary, material review will be conducted, and a decision on the disposition of the product will be made;

(6) A description of packaging and a representative label, or a cross-reference to the physical location of the actual or representative label;

(7) The expected number of packages and labels to be used, if the cannabis product will leave the manufacturing premises in final form and packaged and labeled as it will be sold at retail;

(8) Written instructions for each point, step, or stage in the manufacturing process; and

(9) Written instructions for any action to mitigate risk(s) identified in the product quality plan.

(c) Master manufacturing protocols shall be in writing and made available to the Department upon request.

(d) Nothing in this chapter requires disclosure of the master manufacturing protocol to any person other than the individuals conducting activities that utilize the protocol or to the Department and its inspectors and agents. The licensee may consider the master manufacturing protocol subject to trade secret protection.

29. Title 4 of the California Code of Regulations, section 17216, states:

(a) A licensed manufacturer shall prepare a written batch production record every time a batch of a cannabis product is manufactured or a batch of cannabis or cannabis product is remediated. The batch production record shall accurately follow the appropriate master manufacturing protocol, and each step of the protocol shall be performed in the production of the batch.

(b) The batch production record shall document all the following information about each batch at the time the batch is produced or remediated:

(1) The licensee number or premises address of the facility at which the production occurred;

(2) The date each step of the master manufacturing protocol was performed and the

- 1 initials of the employee performing each step;
- 2 (3) The identity and weight or measure of each component used in production of the  
3 batch;
- 4 (4) The specific equipment and processing lines used in producing or remediating the  
5 batch;
- 6 (5) A statement of the actual yield and the percentage difference from expected yield  
7 at appropriate phases of manufacturing as identified in the master manufacturing protocol;
- 8 (6) If the product quality plan identifies any monitoring needed to ensure product  
9 safety, the results of the monitoring action performed;
- 10 (7) An actual or representative label or other identification of the label to be used for  
11 the cannabis product;
- 12 (8) The actual quantity of the packages and labels used, and the difference from the  
13 expected quantity to be used, if the cannabis product will leave the manufacturing  
14 premises as a final form cannabis good;
- 15 (9) Documentation that quality control personnel:
- 16 (A) Reviewed the batch production record;
- 17 (B) Reviewed all required monitoring operation(s); and
- 18 (C) Either approved and released, or rejected, the finished cannabis product,  
19 including any remediated, repackaged or relabeled cannabis product;
- 20 (10) Documentation, at the time of performance, of any investigation identified in the  
21 product quality plan or master manufacturing protocol, including deviations from the  
22 expected yield or package and label count; and
- 23 (11) The UID and the batch or lot number of the finished batch of cannabis product  
24 and the UIDs of all cannabis or cannabis products used in the batch.
- 25 (c) The batch production record shall:
- 26 (1) Contain the actual values and observations obtained during monitoring and, as  
27 appropriate, during verification activities;
- 28 (2) Be accurate, indelible, and legible;
- (3) Be created concurrently with performance of the activity documented; and
- (4) Be as detailed as necessary to provide a history of work performed.
30. Title 4 of the California Code of Regulations, section 17218, states:
- (a) A licensed manufacturer shall establish and implement a written inventory control plan capable of tracking the location and disposition of all cannabis and cannabis products at the licensed premises.

1 (b) A licensed manufacturer shall reconcile the on-hand inventory of cannabis and  
2 cannabis products at the licensed premises with the records in the track and trace  
system at least once every thirty (30) calendar days.

3 (c) If a licensed manufacturer finds a discrepancy between the on-hand inventory and  
4 the track and trace system, the licensee shall conduct an audit.

5 (d) If the inventory reconciliation conducted pursuant to subsection (b) or the audit  
6 conducted pursuant to subsection (c) reveals a discrepancy that is significant pursuant to  
7 section 15034, the licensed manufacturer shall notify the Department within 24 hours of  
the discovery. The result of inventory reconciliation and any audit shall be retained in the  
licensed manufacturer's records and shall be made available to the Department upon  
request.

8 (e) The licensed manufacturer shall maintain sales invoices and receipts for all  
9 batches of cannabis and cannabis products received at and transferred from its licensed  
premises. The licensed manufacturer shall prepare a sales invoice or receipt that meets  
10 the requirements of Business and Professions Code section 26161 prior to each sale or  
transport of cannabis products from the premises.

11 31. Title 4 of the California Code of Regulations, section 17800, states:

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

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

15 (2) Inspect and test any vehicle or equipment possessed by, in control of, or used by a  
licensee or their agents and employees for the purpose of conducting commercial  
16 cannabis activity.

17 (3) Test any cannabis goods or cannabis-related materials or products possessed by,  
18 in control of, or used by a licensee or their agents and employees for the purpose of  
conducting commercial cannabis activity.

19 (4) Copy any materials, books, or records of any licensee or their agents and  
employees.

20 (b) Failure to cooperate with and participate in any Department investigation pending  
21 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 guaranteed by  
22 the Fifth Amendment to the Constitution of the United States, or any other constitutional or  
statutory privileges. This subsection shall not be construed to require a licensee to  
23 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 other matters within an  
unreasonable period of time in light of the time constraints of the licensee's business.  
24 Any constitutional or statutory privilege exercised by the licensee shall not be used  
against the licensee in a regulatory or disciplinary proceeding against the licensee.

25 (c) Prior notice of an inspection, investigation, review, or audit is not required.

26 (d) Any inspection, investigation, review, or audit of a licensed premises shall be  
27 conducted anytime the licensee is exercising privileges under the license, or as  
otherwise agreed to by the Department and the licensee or its agents, employees, or  
28 representatives.

1 (e) If the licensed premises is not accessible because access is only available by going  
2 through another licensed premises and the licensee occupying the other licensed  
3 premises denies the Department access, the licensees shall both be held responsible  
and subject to discipline.

4 **COST RECOVERY**

5 32. Section 26031.1 of the Code states:

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

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

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

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

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

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

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

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

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

**FACTUAL ALLEGATIONS**

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2 33. On December 19, 2025, Department staff attempted to conduct an unannounced  
3 regulatory compliance inspection of Respondent’s License 5103 premises. Department staff  
4 knocked on the door but no one answered, however shortly after someone exiting through the  
5 same door. Department staff spoke with Oganesh Sudzhyan (Owner Sudzhyan). who stated that  
6 he was out of town and would see about arranging access to the licensed premises.<sup>1</sup> After some  
7 time, Owner Sudzhyan called Department staff and told them that an employee would open the  
8 gate for them. Department staff were met by A.H. who opened the gate to the parking and  
9 outside area of License 5103’s licensed premises. A.H. told Department staff that he did not have  
10 a key to the building which housed License 5103’s licensed premises. Department staff saw an  
11 open door and noted that according the premises diagram on file, it was door leading into  
12 Respondent’s License 2030’s licensed premises. Department staff entered and saw that the space  
13 was being used as a break area and for storage, but there was no cannabis located there.  
14 Department staff called Owner Sudzhyan again to ask about access to the License 5103 licensed  
15 premises, and he stated there was no one available to provide the Department with access.

16 34. On December 19, 2025, Department staff conducted a regulatory compliance  
17 inspection of Respondent’s License 0602 premises, and were accompanied by Respondent’s  
18 employee, G.G. Respondent’s CCTT account showed that License 3597 had received 6 packages  
19 of cannabis trim or flower, totaling of 2,622.55 pounds, on August 6, 2025, which was still in  
20 stock; and also had three packages of distillate, totaling 201 liters of distillate in stock, at the  
21 licensed premises. Department staff could not locate the 2,622.55 pounds of cannabis leaf or  
22 flower on the licensed premises. G.G. did not know whether there was any cannabis trim or  
23 flower at the licensed premises. Department staff located a total of 61 liters of distillate and three  
24 stainless steel cooking pots containing in-process cannabis concentrate. G.G. could not provide  
25 tracking information, such as shipping manifests, for the 61 liters of distillate or batch production

26 <sup>1</sup> Owners, as defined by Business and Professions Code section 26001, subdivision (av), for  
27 Respondent’s Licenses are Patrick Kalashyan and Oganesh Sudzhyan.

1 records for the concentrate in the cooking pots. The 61 liters of distillate and 3 pots of in-process  
2 cannabis extract were embargoed and eventually reportedly voluntarily destroyed by Respondent  
3 on January 16, 2026.

4 35. On December 26, 2025, Department staff requested records, including Manufacturing  
5 Procedures, Product Quality Plans (PQPs), Master Manufacturing Protocols (MMPs), and Batch  
6 Production Records (BPRs), and video surveillance footage for Respondent's licensed premises  
7 for License 3597 and License 5103.

8 36. On December 29, 2025, Respondent submitted PQPs, MMPs, and BPRs for vape  
9 cartridges, infused pre-rolls, and bulk distillate. The submitted documents were insufficient for  
10 the following reasons:

- 11 A. The PQPs were insufficient in that Respondent had not conducted a comprehensive  
12 assessment of the overall manufacturing process to identify each production step and  
13 identify risks associated with each step, identify preventative measure to mitigate the  
14 risks identified, identify monitoring methods for preventative measures, or identify  
15 actions to take if preventative measures are unsuccessful. Additionally, the PQPs did  
16 not evaluate biological hazards, chemical hazards, physical hazards, or process failures.
- 17 B. While Respondent submitted BPRs for different batches of manufactured products, the  
18 BPRs provided were deficient in that they did not document the date that each step of  
19 the master manufacturing protocol was performed, the initials of the employee  
20 performing each step, the identity and weight or measure of each component used in the  
21 batch, the specific equipment or processing lines used in producing the batch, a  
22 statement of yield and percent different from expected yield at various phases of  
23 manufacturing, monitoring methods specified in the product quality plan, an actual or  
24 representative label to be used for the cannabis product, the actual quantity of packages  
25 and labels used and the difference from the expected quantity to be used, documentation  
26 of quality control review, or the UIDs of any cannabis or cannabis products used in the  
27 manufacture of a batch.

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1 Finally, Respondent informed Department staff that the video surveillance system  
2 experienced a hardware-related retention failure affecting the availability of footage for the  
3 requested period and that the surveillance footage was not available. Respondent submitted a  
4 repair invoice dated December 7, 2025, which stated that the equipment had malfunctioned due to  
5 the accumulation of dust on the device.

6 37. A subsequent review of Respondent's CCTT account activity showed the following  
7 for License 3597:

- 8 A. On January 5, 2026, Respondent's License 3597 removed 4 liters of distillate from  
9 distillate batch 235 and combined the 4 liters with 19 liters from batch 211 to create  
10 batch 259. Batch 259 was then transferred to Respondent's License 5103, repackaged  
11 as batch 232 and transferred to another licensee.
- 12 B. On January 7, 2026, Respondent's License 3597 transferred 117 liters of cannabis  
13 extract to Respondent's License 5103. The extract was repackaged to create twenty  
14 (20) different packages of bulk oil on January 15, 2026, which was reportedly used to  
15 produce 39,000 vape cartridge units, which were later sent for regulatory compliance  
16 testing by Respondent's License 2030.
- 17 C. On January 7, 2026, Respondent's License 3597 used 2,622.55 pounds of shake or  
18 flower in its inventory to create 40,710 grams of "Crude Oil-Bulk." The same day,  
19 Respondent used 40,710 grams of Crude Oil-Bulk to create a new package.
- 20 D. On January 16, 2026, batch 235, where the original 4 liters was taken from on January  
21 5, 2026, was adjusted down by 61 liters by License 3597, with a note indicating that the  
22 batch was destroyed due to embargo. In addition, the 40,710 grams of Crude Oil-Bulk  
23 created on January 7, 2026, was adjusted down by 40,710 grams by License 3597, with  
24 a note indicating that it was destroyed pursuant to embargo.
- 25 E. On January 26, 2026, Respondent's License 3597 transferred approximately 75.8 liters  
26 of cannabis distillate to another licensee.
- 27 F. As of February 2, 2026, 17,210 grams of the Crude Oil-Bulk remained in Respondent's  
28 License 3597 inventory.

1           38. On February 10, 2026, Department staff conducted a review of Respondent’s License  
 2 2030, License 0602, License 5103, and License 3597. Respondent’s California Cannabis Track  
 3 and Trace (CCTT) account showed employees A.P., D.T., and O.S. as primary CCTT account  
 4 users. Collectively, Respondent’s licenses held ninety (90) active packages in its CCTT account  
 5 inventory.

6           39. On February 12, 2026, Department staff went to Respondent’s licensed premises for  
 7 License 0602 and License 3597 to conduct a regulatory compliance inspection, and was given  
 8 access to the licensed premises by Respondent’s employee, G.G. Department staff confirmed that  
 9 there was no cannabis located at the licensed premises and the facility appeared to be non-  
 10 operational.

11           40. Department staff then went to Respondent’s licensed premises for License 2030 and  
 12 License 5103 to conduct a regulatory compliance inspection, and was given access to the licensed  
 13 premises by Respondent’s employee, G.G. Upon entering the facility, G.G. stated that the  
 14 licensed premises had recently begun operating, and that Respondent had submitted a premises  
 15 modification request to the Department due to recent flooding and damage to the premises from  
 16 rain.

17           41. Department staff began the inspection in the distribution area where they located  
 18 twenty-four (24) tote bags and nineteen (19) boxes containing bulk, unpackaged, cannabis infused  
 19 gummies in several flavors. Some of the containers were labeled with strain names or flavors as  
 20 well as counts or net weights. Several of the containers of gummies did not have any labels or  
 21 identifiers. The cannabis gummies were being stored in the section of the licensed premises  
 22 identified as the packaging and labeling area on the premises diagram on file with the  
 23 Department. When asked for the production batch records, manifests or UID tags for the  
 24 gummies, G.G. stated that the gummies were made onsite in the last two days and therefore, there  
 25 were no tags for the gummies. G.G. also stated that Respondent was behind on recording  
 26 transactions in its CCTT account. There was no equipment onsite that would indicate that the  
 27 cannabis gummies were manufactured on Respondent’s licensed premises.

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**SECOND CAUSE FOR DISCIPLINE**

(All Licenses: Use of Harvest Batch Name and Package Tags)

46. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15048.5, subdivisions (b) and (c), in that Respondent failed to tag, label, and record all information about batches and packages as required and as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**THIRD CAUSE FOR DISCIPLINE**

(All Licenses: Track and Trace Reporting)

47. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15049, in that Respondent failed to record all cannabis activity for its licenses in its CCTT account as required and as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**FOURTH CAUSE FOR DISCIPLINE**

(Distributor Licenses 0602 and 2030: Inventory Accounting)

48. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 3, section 15309, in that Respondent failed to account for all inventory as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**FIFTH CAUSE FOR DISCIPLINE**

(Distributor Licenses 0602 and 2030: Records and Shipping Manifest)

49. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15037 and 15314, in that Respondent failed to generate or maintain shipping manifests through its CCTT account as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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**FIFTH CAUSE FOR DISCIPLINE**

(Manufacturer Licenses: Procedures, Plans, Protocols, and Records )

50. Respondent is subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 17213, 17214, 17215, 17216, and 17218, in that Respondent failed to maintain proper manufacturing procedures, plans, protocols, and records as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**SIXTH CAUSE FOR DISCIPLINE**

(Manufacturer Licenses: Misbranded Cannabis Product)

51. Respondent is further subject to disciplinary action under Code sections 26030, subdivision (a), 26039.3, and 26070.2, subdivision (e), in that Respondent manufactured misbranded cannabis product from embargoed cannabis and had possession of misbranded cannabis from an unknown source as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**SEVENTH CAUSE FOR DISCIPLINE**

(All Licenses: Video Surveillance System)

52. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15044, in that Respondent failed to maintain a video surveillance system that was able to effectively and clearly record images of the area under surveillance at all times and failed to provide video surveillance footage for its licensed premises for a period of 90 days when requested as more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**EIGHTH CAUSE FOR DISCIPLINE**

(All Licenses: Right of Access)

53. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d), and 17800 in that Respondent failed to provide the Department with full and immediate

1 access to all licensed premises and Respondent failed to provide the Department with records as  
2 more particularly alleged in paragraphs 33 through 44, above, which are hereby incorporated by  
3 reference and realleged as if fully set forth herein.

4 **PRAYER**

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

8 1. Revoking or suspending outright or suspending with terms and conditions or fining or  
9 any combination thereof, the Cannabis Distributor License Number C11-0000602-LIC, issued to  
10 Respondent Vampa Oil LLC with Patrick Kalashyan, DRP/Owner;

11 2. Revoking or suspending outright or suspending with terms and conditions or fining or  
12 any combination thereof, the Cannabis Distributor License Number C11-0002030-LIC, issued to  
13 Respondent Vampa Oil LLC with Patrick Kalashyan, DRP/Owner;

14 3. Revoking or suspending outright or suspending with terms and conditions or fining or  
15 any combination thereof, the Cannabis Manufacturer - Type 6 License Number DCC-10003597,  
16 issued to Respondent Vampa Oil LLC with Patrick Kalashyan, DRP/Owner;

17 4. Revoking or suspending outright or suspending with terms and conditions or fining or  
18 any combination thereof, the Cannabis Manufacturer - Type N License Number DCC-10005103,  
19 issued to Respondent Vampa Oil LLC with Patrick Kalashyan, DRP/Owner;

20 5. Ordering Respondent Vampa Oil LLC with Patrick Kalashyan, DRP/Owner to pay  
21 the Department of Cannabis Control the reasonable costs of the investigation and enforcement of  
22 this case, pursuant to Business and Professions Code section 26031.1;

23 6. Ordering the destruction of cannabis and cannabis goods in the possession of Vampa  
24 Oil LLC with Patrick Kalashyan, DRP/Owner at Respondent's expense, if revocation of Cannabis  
25 Distributor License Number C11-0000602-LIC is ordered, pursuant to California Code of  
26 Regulations, title 4, section 15024.1, subdivision (a); and

27 7. Ordering the destruction of cannabis and cannabis goods in the possession of Vampa  
28 Oil LLC with Patrick Kalashyan, DRP/Owner at Respondent's expense, if revocation of Cannabis

1 Distributor License Number C11-0002030-LIC is ordered, pursuant to California Code of  
2 Regulations, title 4, section 15024.1, subdivision (a); and

3 8. Ordering the destruction of cannabis and cannabis goods in the possession of Vampa  
4 Oil LLC with Patrick Kalashyan, DRP/Owner at Respondent's expense, if revocation of Cannabis  
5 Manufacturer - Type 6 License Number DCC-10003597 is ordered, pursuant to California Code  
6 of Regulations, title 4, section 15024.1, subdivision (a); and

7 9. Ordering the destruction of cannabis and cannabis goods in the possession of Vampa  
8 Oil LLC with Patraick Kalashyan, DRP/Owner at Respondent's expense, if revocation of  
9 Cannabis Manufacturer - Type N License Number DCC-10005103 is ordered, pursuant to  
10 California Code of Regulations, title 4, section 15024.1, subdivision (a); and

11 10. Taking such other and further action as deemed necessary and proper.

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13 DATED: 4/1/2026

Zarha Ruiz, REHS Digitally signed by Zarha Ruiz,  
REHS  
Date: 2026.04.01 11:42:11 -07'00'

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

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## PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: Vampa Oil, LLC  
DCC Case No. DCC26-0000297-INV  
License Nos. C11-0000602-LIC, Distributor; C11-0002030-LIC, Distributor; DCC-10003597,  
Manufacturer-Type 6; DCC-10005103, Manufacturer-Type N

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 12, 2026, I served the within documents:

### ORDER ADOPTING STIPULATED SETTLEMENT AND ORDER AS FINAL DECISION

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

Vampa Oil, LLC  
Patrick Kalashyan, DRP/Owner  
patrick@goldengaminggroup.com

Lisa Selan, Esq.  
Selan Law Firm  
lisa@selanlaw.com

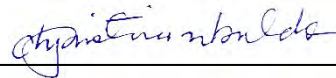
Evelyn Schaeffer  
Deputy Director  
Compliance Division  
Department of Cannabis Control  
Evelyn.Schaeffer@cannabis.ca.gov

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

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

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

Executed on May 12, 2026, at Rancho Cordova, California.



Christina C. Ubaldo