



May 26, 2026

VIA EMAIL ONLY

Osminog, LLC dba Rosebud Delivery and
Top Shelf Express
Addison Wong, DRP/Owner
addisonlwong@gmail.com
info@rosebuddelivery.com

Antonio Zamora, Owner
Osminog, LLC dba Rosebud Delivery and
Top Shelf Express
chronmeds831@gmail.com

Re: Osminog, LLC dba Rosebud Delivery and Top Shelf Express
Case No. DCC25-0002257-INV
Order Adopting Stipulated Settlement and Order as Final Decision

Dear Messrs. Wong and Zamora:

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 Osminog, LLC dba Rosebud Delivery and Top Shelf Express.

The Department's Order and Final Decision will be effective today, May 26, 2026. Pursuant to this Final Decision and its stipulated settlement, Osminog, 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:

**OSMINOG, LLC DBA ROSEBUD
DELIVERY AND TOP SHELF EXPRESS;
ADDISON WONG, DRP/OWNER;
ANTONIO ZAMORA, OWNER**

300 Pendleton Way #310
Oakland, CA 94621

Cannabis Retailer Non-Storefront License
No. C9-0000255-LIC

Respondent.


CASE NO. DCC25-0002257-INV

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

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

This Order and Final Decision shall become effective on May 26, 2026.

IT IS SO ORDERED, May 26, 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
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6 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC25-0002257-INV

12 **OSMINOG, LLC DBA ROSEBUD**
13 **DELIVERY AND TOP SHELF EXPRESS;**
14 **ADDISON WONG, DRP/OWNER**
15 **300 PENDLETON WAY #310**
16 **OAKLAND, CA 94621**

STIPULATED SETTLEMENT FOR
REVOCAION OF LICENSE AND
ORDER

17 **Cannabis Retailer - Nonstorefront License**
No. C9-0000255-LIC

Respondent.

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

20 **PARTIES**

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

25 2. Respondent Osminog, LLC dba Rosebud Delivery and Top Shelf Express
26 (Respondent) is representing themselves in this proceeding and has chosen not to exercise its right
27 to be represented by counsel. Respondent is acting in this proceeding through Addison Wong,
28 Designated Responsible Party and an Owner, and he has been designated and authorized by

1 Osminog LLC to enter into this agreement on behalf of the Osminog LLC (hereafter “Authorized
2 Representative”)

3 3. On or about August 13, 2019, the Department issued Cannabis Retailer -
4 Nonstorefront License No. C9-0000255-LIC to Respondent. The Cannabis Retailer -
5 Nonstorefront License was in full force and effect at all times relevant to the charges brought in
6 Accusation No. DCC25-0002257-INV, and will expire on August 12, 2026, unless renewed.

7 **JURISDICTION**

8 4. Accusation No. DCC25-0002257-INV was filed before the Department, and is
9 currently pending against Respondent. The Accusation and all other statutorily required
10 documents were properly served on Respondent on December 10, 2025. Respondent timely filed
11 its Notice of Defense contesting the Accusation.

12 5. A true and correct copy of Accusation No. DCC25-0002257-INV is attached as
13 Exhibit A and incorporated herein by reference.

14 **ADVISEMENT AND WAIVERS**

15 6. Respondent through its Authorized Representative has carefully read, and
16 understands the charges and allegations in Accusation No. DCC25-0002257-INV. Respondent
17 through its Authorized Representative has also carefully read, and understands the effects of this
18 Stipulated Settlement and Disciplinary Order.

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

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

1 agrees to receive a copy of the Decision and Order in this matter via email at the following email
2 address: addisonlwong@gmail.com.

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

5 **CULPABILITY**

6 10. Respondent through its Authorized Representative admits the truth of each and every
7 charge and allegation in Accusation No. DCC25-0002257-INV.

8 11. Respondent through its Authorized Representative agrees that its Cannabis Retailer -
9 Nonstorefront License is subject to discipline and they agree to be bound by the Department
10 imposition of discipline as set forth in the Disciplinary Order below.

11 **CONTINGENCY**


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

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

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

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

4
5 DATED: 05/16/26


OSMINOG, LLC DBA ROSEBUD DELIVERY AND
TOP SHELF EXPRESS; ADDISON WONG,
OWNER/AUTHORIZED REPRESENTATIVE
Respondent

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9 **ENDORSEMENT**

10 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
11 submitted for consideration by the Department of Cannabis Control.

12
13 DATED: 05/16/26

Respectfully submitted,

14 ROB BONTA
Attorney General of California



15
16
17 HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

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21 SA2025803937

Exhibit A

Accusation No. DCC25-0002257-INV

1 ROB BONTA
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3 State Bar No. 198769
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E-mail: Harinder.Kapur@doj.ca.gov
6 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC25-0002257-INV

12 **OSMINOG, LLC DBA ROSEBUD**
13 **DELIVERY AND TOP SHELF EXPRESS;**
14 **ADDISON WONG, OWNER**
15 **ANTONIO ZAMORA, OWNER**
16 **300 PENDLETON WAY #310**
17 **OAKLAND, CA 94621**

ACCUSATION

18 **Cannabis Retailer - Nonstorefront License**
19 **No. C9-0000255-LIC**

Respondent.

20 Complainant alleges:

21 **PARTIES**

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

24 2. On or about August 13, 2019, the Department issued Cannabis Retailer -
25 Nonstorefront License No. C9-0000255-LIC to Osminog, LLC dba Rosebud Delivery and Top
26 Shelf Express; with Addison Wong (Owner Wong) and Antonio Zamora (Owner Zamora),
27 Owners. The Cannabis Retailer - Nonstorefront License was in full force and effect at all times
28 relevant to the charges brought herein and will expire on August 12, 2026, unless renewed.

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 December 2, 2025, and was effective the same day at 5:00 p.m. The EDO suspended
5 Respondent’s license and ordered Respondent to cease all commercial cannabis activity. The
6 time to initiate adjudicative proceedings is within 10 days after the issuance or effective date of
7 the EDO, or in this case by or on December 12, 2025.

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
27 consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of
28 Marijuana Act.

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 12. Section 26038 of the Code, in pertinent part, states:

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

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

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

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

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

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

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

26 ...

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

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

...

14. Section 26160 of the Code, in pertinent part, states:

...

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

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

3 (f) If a licensee, or an agent or employee of a licensee, fails to maintain or
4 provide the records required pursuant to this section, the licensee shall be subject to a
citation and fine of up to thirty thousand dollars (\$30,000) per individual violation.

5 **REGULATORY PROVISIONS**

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

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

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

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

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

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

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

19 16. Title 4 of the California Code of Regulations, section 15002, in pertinent part, states:

20 . . .

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

22 . . .

23 (22) Proof of a surety bond of at least \$5,000 payable to the State of California for
24 each licensed premises. . .

25 17. Title 4 of the California Code of Regulations, section 15003, states:

26 (a) An applicant for a commercial cannabis license or a licensee shall disclose
27 all owners of the commercial cannabis business. An owner of the commercial
cannabis business includes all of the following:

1 (1) A person with an aggregate ownership interest of 20 percent or more in the
2 commercial cannabis business, unless the interest is solely a security, lien, or
3 encumbrance. For purposes of this section, "aggregate" means the total ownership
4 interest held by a single person through any combination of individually held
5 ownership interests in a commercial cannabis business and ownership interests in an
6 entity that has an ownership interest in the same commercial cannabis business. For
7 example, a person who owns 10 percent of the stock in a commercial cannabis
8 business as an individual shareholder and 100 percent of the stock in an entity that
9 owns 10 percent of the stock in the same commercial cannabis business has a 20
10 percent aggregate ownership interest in the commercial cannabis business.

11 (2) An individual who manages, directs, or controls the operations of the
12 commercial cannabis business, including but not limited to:

13 (A) A member of the board of directors of a nonprofit.

14 (B) A general partner of a commercial cannabis business that is organized as a
15 partnership.

16 (C) A non-member manager or managing member of a commercial cannabis
17 business that is organized as a limited liability company.

18 (D) The trustee(s) and all persons who have control of the trust and/or the
19 commercial cannabis business that is held in trust.

20 (E) The chief executive officer, president or their equivalent, or an officer,
21 director, vice president, general manager or their equivalent.

22 (b) If the commercial cannabis business is owned in whole or in part by an
23 entity and the entity includes individuals who manage, direct, or control the
24 operations of the commercial cannabis business, as described in subsection (a)(2)(E),
25 those individuals shall also be disclosed as owners.

26 (c) If available evidence indicates that an individual qualifies as an owner, the
27 Department may notify the applicant or licensee that they must either disclose the
28 individual as an owner and submit the information required by section 15002 or
demonstrate that the individual does not qualify as an owner.

18. Title 4 of the California Code of Regulations, section 15004, states:

(a) An applicant for a commercial cannabis license or a licensee shall disclose
all financial interest holders. A financial interest holder of the commercial cannabis
business includes all of the following, except as provided in subsection (b):

(1) A person with an aggregate ownership interest of less than 20 percent.

(2) A person providing a loan to the commercial cannabis business.

(3) A person entitled to receive 10 percent or more of the profits of the
commercial cannabis business, including:

(A) An employee who has entered into a profit share plan with the commercial
cannabis business.

(B) A landlord who has entered into a lease agreement with the commercial

1 cannabis business for a share of the profits.

2 (C) A consultant who is providing services to the commercial cannabis business
3 for a share of the profits.

4 (D) A person acting as an agent, such as an accountant or attorney, for the
5 commercial cannabis business for a share of the profits.

6 (E) A broker who is engaging in activities for the commercial cannabis business
7 for a share of the profits.

8 (F) A salesperson who earns a commission.

9 (G) A person who has entered into an intellectual property licensing agreement
10 for a share of the profits.

11 (b) Financial interest holders do not include any of the following:

12 (1) A bank or financial institution whose interest constitutes a loan;

13 (2) Persons whose only financial interest in the commercial cannabis business is
14 through an interest in a diversified mutual fund, blind trust, or similar instrument;

15 (3) Persons whose only financial interest is a security interest, lien, or
16 encumbrance on property that will be used by the commercial cannabis business; and

17 (4) Persons who hold a share of stock that is less than 10 percent of the total
18 shares in a publicly traded or privately held company.

19 19. Title 4 of the California Code of Regulations, section 15037, states:

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

24 (1) Financial records including, but not limited to, bank statements, sales
25 invoices, receipts, tax records, and all records required by the California Department
26 of Tax and Fee Administration (formerly Board of Equalization) under title 18,
27 California Code of Regulations, sections 1698 and 4901.

28 (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.

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

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

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

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

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

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

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

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

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

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

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

26 (2) Limited-access areas;

27 (3) Security rooms;

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

(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).

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

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

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

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

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

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

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

27 21. Title 4 of the California Code of Regulations, section 15047, states:

28 (a) A licensee shall maintain an alarm system as defined in Business and Professions
Code section 7590.1 (c) at 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) A licensee shall ensure a licensed alarm company operator or one or more of its
registered alarm agents installs, maintains, monitors, and responds to the alarm system.

(c) Upon request, a licensee shall make available to the Department all information
related to the alarm system, monitoring, and alarm activity.

(d) If multiple licensed premises are contained within the same building or parcel of
land, a single alarm system covering the entire building or parcel of land may be used by all
of the licensees if all licensees have access to and are able to provide the information
under subsection (c). All licensees shall be held responsible and subject to discipline for
any violations of the alarm system requirements.

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

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

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

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

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

12 23. Title 4 of the California Code of Regulations, section 15048.1, states:

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

14 (1) Designate track and trace system users, as needed, and require the system
15 users to be trained in the proper and lawful use of the track and trace system before
16 the users are permitted to access the track and trace system;

17 (2) Maintain an accurate and complete list of all of the licensee's track and trace
18 system users, including full names and usernames, and update the list immediately
19 when changes occur;

20 (3) Remove a user from the licensee's track and trace system account when that
21 individual is no longer authorized to represent the licensee;

22 (4) Correct any data entry errors within three (3) calendar days of discovery of
23 the error;

24 (5) Tag and enter all inventory in the track and trace system as required by
25 section 15049;

26 (6) Monitor all system notifications and resolve all issues identified. The
27 notification shall not be dismissed by an account manager before resolution of the
28 issue(s) identified in the notification;

(7) Notify the Department of any loss of access to the track and trace system
that exceeds 72 hours; and

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

24. 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.

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

3 (1) Receipt of cannabis or cannabis products.

4 (2) Rejection of transferred cannabis or cannabis products.

5 (3) Manufacturing of cannabis or cannabis products.

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

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

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

10 (7) Laboratory testing, including testing results.

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

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

13 (1) The type of cannabis or cannabis products.

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

15 (3) The date of activity.

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

17 (5) The brand name of the cannabis goods.

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

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

21 (B) The reason for destruction or disposal; and

22 (C) The method of disposal.

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

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

26 25. Title 4 of the California Code of Regulations, section 15051, states:

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

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

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

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

8 COST RECOVERY

9 26. Section 26031.1 of the Code states:

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

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

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

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

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

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

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

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

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

3 **FACTUAL ALLEGATIONS**

4 27. On or about October 23, 2025, Department staff conducted a review of Respondent's
5 California Cannabis Track and Trace (CCTT) account and reporting activity. The review showed
6 Respondent had renewed its license annually but had not reported any retail sales in its CCTT
7 account since September 22, 2022. Respondent had reported accepting incoming transfers of
8 cannabis goods through August 1, 2022, after which the next time Respondent reported accepting
9 an incoming transfer was on February 27, 2025. From February 27, 2025, through October 23,
10 2025, Respondent reported accepting one-hundred and seventeen (117) incoming transfers,
11 containing 4,430 packages of cannabis goods in its CCTT account. Between September 10, 2025,
12 and October 23, 2025, Respondent made negative adjustments to 4,605 cannabis packages, by
13 reporting various forms of product damage, poor or incorrect quantity, and indicating that most of
14 the adjusted units had been wasted thereby removing a total of 420,945 individual units of
15 cannabis goods from its active inventory and bringing its active cannabis inventory to zero.

16 28. On October 23, 2025, Department staff attempted to conduct an unannounced
17 regulatory compliance inspection at Respondent's licensed premises. Department staff contacted
18 and spoke with Owner Zamora on the telephone. Owner Zamora indicated that he lives out of the
19 area and was not actively involved in the Respondent's day to day business operations. Owner
20 Zamora indicated that Department staff should speak with Owner Wong. Department staff then
21 spoke with Owner Wong who stated that he was away from the premises and was not planning on
22 being there that day. Owner Wong further stated that Respondent is not currently engaged in the
23 sale of cannabis goods. When asked if any cannabis or cannabis goods were stored inside of
24 Respondent's licensed premises, Owner Wong stated that there was cannabis goods currently
25 stored inside the licensed premises. Department staff and Owner Wong scheduled a regulatory
26 compliance inspection for October 30, 2025.

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1 29. On or about October 27, 2025, Respondent removed five previously authorized users
2 from its CCTT account, including the user account responsible for reporting the negative
3 inventory adjustments in 2025.

4 30. On October 30, 2025, Department staff conducted a regulatory compliance inspection
5 of Respondent's premises. Owner Wong explained that he purchased a 50% ownership share of
6 Respondent in 2024. Owner Wong stated that the formal sale documents indicated that he
7 purchased his ownership interest from Owner Zamora, however he actually purchased his 50%
8 share from J.M.G. Owner Wong further stated that he paid \$25,000 for the 50% share, and that
9 although Owner Zamora appeared in the official ownership documents submitted to the
10 Department, Owner Zamora does not participate in Respondent's business operations. Owner
11 Wong revealed that J.M.G. owns the other 50% share of Respondent and makes business
12 operation decisions. Department staff asked Owner Wong for paperwork showing that J.M.G.
13 was an owner, but Owner Wong stated he did not have documentation.

14 31. During the regulatory compliance inspection, Department staff located 3 shelves
15 which contained 135 cannabis packages, consisting of several hundred individual units of
16 cannabis goods. None of the 135 packages were listed in Respondent's CCTT account inventory.
17 Owner Wong was unable to explain why the cannabis goods were not reported in Respondent's
18 CCTT account inventory. Owner Wong further stated that he had not conducted an inventory
19 reconciliation since purchasing his 50% ownership interest of Respondent in 2024, and neither
20 had he logged into Respondent's CCTT account for several months. Owner Wong acknowledged
21 that he had not conducted a full review of Respondent's CCTT activity and was unaware of the
22 full extent of the transfer and inventory adjustments being made.

23 32. Owner Wong was asked for the records to substantiate the source and transfer of the
24 more than 420,000 units of cannabis goods that had been reported wasted in 2025. Owner Wong
25 did not have any records. Owner Wong further claimed that none of cannabis goods had actually
26 been transferred to Respondent's premises. Owner Wong claimed that J.M.G. had likely diverted
27 the cannabis to the illegal market.

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1 33. Department staff requested video surveillance system recordings from Owner Wong.
2 Owner Wong indicated that the video surveillance system was non-operational. When asked
3 whether Respondent had an active premises security alarm system. Owner Wong stated the alarm
4 system was not operational. Owner Wong further stated to that to his knowledge both systems
5 had not been operational since 2024.

6 34. Department staff requested to see Respondent’s valid commercial business insurance
7 policy, including a surety bond. Owner Wong replied that Respondent did not have a current
8 policy because he “didn’t know he needed one,” or words to that effect.

9 35. On October 30, 2025, Respondent was issued an Initial Notice of Embargo for the
10 135 cannabis packages that were not listed in its CCTT account inventory.

11 36. On or about October 31, 2025, Department staff requested the following information
12 from Respondent: a detailed description of when, how and from whom Owner Wong came to
13 acquire his 50% share of Respondent, a list of all current owners and interested parties, a list of
14 all persons who have access to Respondent’s CCTT account, detailed information about all
15 cannabis goods accepted into Respondent’s inventory since February 27, 2025, a description of
16 all reported inventory adjustments and the status of the security and video surveillance systems, a
17 copy of Respondent’s business liability insurance policy, employment records for any persons
18 currently working for Respondent, and a copy of the current lease for Respondent’s licensed
19 premises. Respondent was issued a Supplemental Notice of Embargo directing Respondent to
20 submit a written plan by November 11, 2025, describing how it would address the issues that
21 resulted in the embargo.

22 37. On or about November 3, 2025, Owner Wong submitted the following information to
23 the Department about Respondent: details of his purchase of an ownership interest; current
24 ownership structure; CCTT account access information; status of products and non-compliant
25 activity; inventory discrepancies; and surveillance and security system issues.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 (Cannabis Activity Between Licensees)

3 38. Respondent is subject to disciplinary action under Code sections 26030, subdivision
4 (a), and 26053, subdivision (a), and California Code of Regulations, title 4, section 15000.1,
5 subdivision (a), in that Respondent engaged in commercial cannabis activity with unlicensed
6 persons as more particularly alleged in paragraphs 27 through 37, above, which are hereby
7 incorporated by reference and realleged as if fully set forth herein.

8 **SECOND CAUSE FOR DISCIPLINE**

9 (Owners Financial Interest)

10 39. Respondent is further subject to disciplinary action under Code section 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15003 and 15004, in
12 that Respondent failed to disclose all owners with a financial interest in Respondent as more
13 particularly alleged in paragraphs 27 through 37, above, which are hereby incorporated by
14 reference and realleged as if fully set forth herein.

15 **THIRD CAUSE FOR DISCIPLINE**

16 (General Record Retention Requirements)

17 40. Respondent is further subject to disciplinary action under Code section 26030,
18 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15037, in that
19 Respondent failed to retain records as more particularly alleged in paragraphs 27 through 37,
20 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

21 **FOURTH CAUSE FOR DISCIPLINE**

22 (Track and Trace Requirements)

23 41. Respondent is further subject to disciplinary action under Code section 26030,
24 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, 15049,
25 subdivision (b), and 15051, in that Respondent failed to comply with track and track requirements
26 as more particularly alleged in paragraphs 27 through 37, above, which are hereby incorporated
27 by reference and realleged as if fully set forth herein.

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1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Video Surveillance System)

3 42. Respondent is further subject to disciplinary action under Code section 26030,
4 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15044, subdivisions
5 (b), (d), (h), and (i), in that Respondent for failed to maintain a video surveillance system as
6 required as more particularly alleged in paragraph 33, above, which is hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **SIXTH CAUSE FOR DISCIPLINE**

9 (Alarm System)

10 43. Respondent is further subject to disciplinary action under Code section 26030,
11 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15047, in that
12 Respondent failed to maintain an alarm system as more particularly alleged in paragraph 33,
13 above, which is hereby incorporated by reference and realleged as if fully set forth herein.

14 **SEVENTH CAUSE FOR DISCIPLINE**

15 (Responsibilities of the Designated Account Manager)

16 44. Respondent is further subject to disciplinary action under Code section 26030,
17 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15048.1, subdivisions
18 (a)(2) and (a)(3), in that Respondent failed to maintain an accurate and complete list of all users
19 and remove unauthorized users from its track and trace system account as more particularly
20 alleged in paragraphs 29 and 31, above, which are hereby incorporated by reference and realleged
21 as if fully set forth herein.

22 **EIGHTH CAUSE FOR DISCIPLINE**

23 (Surety Bond)

24 45. Respondent is further subject to disciplinary action under Code section 26030,
25 subdivisions (a) and (c), and California Code of Regulations, title 4, section 15002, subdivision
26 (c)(22), in that Respondent failed to maintain a surety bond as more particularly alleged in
27 paragraph 34, above, which is hereby incorporated by reference and realleged as if fully set forth
28 herein.

1 **CAUSE FOR FINE**

2 46. Respondent is subject to civil fine under Code section 26038 for aiding and abetting
3 illegal commercial cannabis activity as more particularly alleged in paragraphs 27 through 37,
4 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

5 **PRAYER**

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

9 1. Revoking or suspending outright or suspending with terms and conditions or fining or
10 any combination thereof, the Cannabis Retailer - Nonstorefront License Number C9-0000255-
11 LIC, issued to Respondent Osminog, LLC dba Rosebud Delivery and Top Shelf Express; with
12 Addison Wong and Antonio Zamora, Owner;

13 2. Ordering Respondent Osminog, LLC dba Rosebud Delivery and Top Shelf Express;
14 with Addison Wong and Antonio Zamora, Owners, to pay the Department of Cannabis Control
15 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and
16 Professions Code section 26031.1;

17 3. Ordering the destruction of cannabis and cannabis goods in the possession of
18 Respondent Osminog, LLC dba Rosebud Delivery and Top Shelf Express; with Addison Wong,
19 and Antonio Zamora, Owners, at Respondent's expense, if revocation of Cannabis Retailer -
20 Nonstorefront License Number C9-0000255-LIC is ordered, pursuant to California Code of
21 Regulations, title 4, section 15024.1, subdivision (a); and

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

23
24 DATED: December 9, 2025 _____

Evelyn Schaeffer

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

28 SA2025803937

PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: Osminog, LLC dba Rosebud Delivery and Top Shelf Express
DCC Case No. DCC25-0002257-INV
License No. C9-0000255-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 26, 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.

Osminog, LLC dba Rosebud Delivery
and Top Shelf Express
Addison Wong, DRP/Owner
addisonlwong@gmail.com
info@rosebuddelivery.com

Antonio Zamora, Owner
Osminog, LLC dba Rosebud Delivery
and Top Shelf Express
chronmeds831@gmail.com

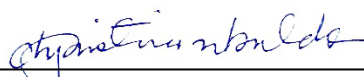
Evelyn Schaeffer
Deputy Director
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Department of Cannabis Control
Evelyn.Schaeffer@cannabis.ca.gov

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 26, 2026, at Rancho Cordova, California.



Christina C. Ubaldo