

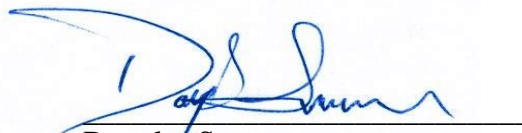
1
2
3 **BEFORE THE**
4 **DEPARTMENT OF CANNABIS CONTROL**
5 **OF THE STATE OF CALIFORNIA**

6 In the Matter of the Accusation Against:) CASE NO. DCC23-0001958-INV
7)
8) **FINAL DECISION**
9 GREEN LIGHT DISTRIBUTION)
10 ASSOCIATES INC.,)
11 Ellie Taj, Owner)
12 8380 Miramar Mall, Ste. 222)
13 San Diego, CA 92121)
14 License Number CII-0001803-LIC)
15 Respondent.)

16 The Department of Cannabis Control (Department) hereby adopts the attached Stipulated
17 Revocation of Licenses and Order as its Final Decision.

18 Pursuant to subsection (a) of Government Code Section 11519 this Decision shall
19 become effective on September 11, 2024.

20
21 IT IS SO ORDERED, August 9, 2024.

22
23 

24 Douglas Smurr
25 Assistant General Counsel
26 FOR THE DEPARTMENT OF
27 CANNABIS CONTROL
28

1 ROB BONTA
Attorney General of California
2 JOSHUA B. EISENBERG
Supervising Deputy Attorney General
3 GREGORY M. CRIBBS
Deputy Attorney General
4 State Bar No. 175642
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6259
6 E-mail: Gregory.Cribbs@doj.ca.gov
Attorneys for Complainant
7

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

11
12 In the Matter of the Accusation Against:
13 **GREEN LIGHT DISTRIBUTION**
14 **ASSOCIATES, INC.,**
15 **Ellie Taj, Owner**
16 **8380 Miramar Mall, STE 222**
San Diego, CA 92121
17 **License Number C11-0001803-LIC**
18 Respondent.
19

Case No. DCC23-0001958-INV

**STIPULATED REVOCATION OF
LICENSE AND ORDER**

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

22 **PARTIES**

23 1. Jeff Merriman (Complainant) is the Deputy Director of the Compliance Division of
24 the Department of Cannabis Control (Department). He brought this action solely in his official
25 capacity and is represented in this matter by Rob Bonta, Attorney General of the State of
26 California, by Gregory M. Cribbs, Deputy Attorney General.
27
28

1 CULPABILITY

2 8. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. DCC23-0001958-INV, agrees that cause exists for discipline, and hereby stipulates to the
4 revocation of its Adult-Use and Medicinal Distributor License Number C11-0001803-LIC.

5 9. Respondent understands that by signing this stipulation, Respondent enables the
6 Department to issue an order revoking its Adult-Use and Medicinal Distributor License Number
7 C11-0001803-LIC without further process.

8 CONTINGENCY

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

18 11. The parties understand and agree that Portable Document Format (PDF) and facsimile
19 copies of this Stipulated Revocation of License and Order, including PDF and facsimile
20 signatures thereto, shall have the same force and effect as the originals.

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

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

4 **ORDER**

5 IT IS HEREBY ORDERED that Adult-Use and Medicinal Distributor License Number
6 C11-0001803-LIC, issued to Respondent Green Light Distribution Associates, Inc. and its owner
7 Ellie Taj, is revoked.

8 1. The revocation of Respondent's Adult-Use and Medicinal Distributor License
9 Number C11-0001803-LIC shall constitute the imposition of discipline against Respondent. This
10 stipulation constitutes a record of the discipline and shall become a part of Respondent's license
11 history with the Department.

12 2. Respondent shall lose all rights and privileges as an Adult-Use and Medicinal
13 Distribution licensee in California as of the effective date of the Department's Decision and
14 Order.

15 3. If Respondent ever files an application for licensure or reinstatement of license in the
16 State of California, the Department shall treat it as a petition for reinstatement. Respondent must
17 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
18 effect at the time the petition is filed, and all of the charges and allegations contained in
19 Accusation No. DCC23-0001958-INV shall be deemed to be true, correct and admitted by
20 Respondent when the Department determines whether to grant or deny the petition.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

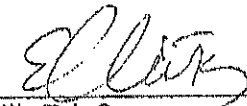
27 ///

28 ///

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

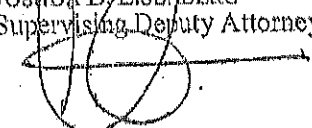
ACCEPTANCE

I have carefully read the above Stipulated Revocation of License and Order. I understand the stipulation and the effect it will have on my Adult-Use and Medicinal Distributor License Number C11-0001803-LIC. I enter into this Stipulated Revocation of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department of Cannabis Control.

DATED: 4-24-24 
Elle Taj, Owner
GREEN LIGHT DISTRIBUTION
ASSOCIATES, INC.
Respondent

ENDORSEMENT

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

DATED: APRIL 22, 2024 Respectfully submitted,
ROB BONTA
Attorney General of California
JOSHUA B. EISENBERG
Supervising Deputy Attorney General

GREGORY M. CRIBBS
Deputy Attorney General
Attorneys for Complainant

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

Exhibit 1

Accusation No. DCC23-0001958-INV

1 ROB BONTA
Attorney General of California
2 JOSHUA B. EISENBERG
Supervising Deputy Attorney General
3 State Bar No. 279323
GREGORY M. CRIBBS
4 Deputy Attorney General
State Bar No. 175642
5 300 S. Spring Street
Los Angeles, CA 90013
6 Telephone: (213) 269-6259
Gregory.Cribbs@doj.ca.gov
7 *Attorneys for Complainant*

8
9 **BEFORE THE**
DEPARTMENT OF CANNABIS CONTROL
10 **OF THE STATE OF CALIFORNIA**
11

12 In the Matter of the Accusation Against:
13 **GREEN LIGHT DISTRIBUTION**
ASSOCIATES, INC.,
14 **Ellie Taj, Owner**
15 **8380 Miramar Mall, STE 222**
San Diego, CA 92121
16 **License Number C11-0001803-LIC**
17 **Respondent.**

Case No. DCC23-0001958-INV
OAH Case No.

ACCUSATION

18 **PARTIES**
19

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

23 2. On or about March 17, 2023, the Department issued Adult-Use and Medicinal
24 Distributor License Number C11-0001803-LIC to Green Light Distribution Associates, Inc.
25 (Respondent) with Ellie Taj as Owner. The Adult-Use and Medicinal Distributor License was in
26 full force and effect at all times relevant to the charges brought herein and will expire on March
27 16, 2024, unless renewed.

28 *///*

JURISDICTION

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

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

4. Section 26010 of the Code states:

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

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

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

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

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

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

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

8. Section 26031 of the Code states, in part:

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

...

(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....

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

9. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

10. Section 26030 of the Code states:

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

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

...

(c) Any other grounds contained in regulations adopted by a licensing authority pursuant to this division.

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

REGULATORY PROVISIONS

11. Title 4 of the California Code of Regulations, section 15000.5 states:

In construing and enforcing the provisions of the Act and the regulations in this division, the act, omission, or failure of an agent, officer, representative, or other person acting for or employed by a licensee, within the scope of their employment or office, shall in every case be deemed the act, omission, or failure of the licensee.

12. Title 4 of the California Code of Regulations, section 15048, states, in pertinent part:

(a) Each applicant or licensee shall identify an owner of the commercial cannabis business as the track and trace system account manager. A licensee may change the account manager by submitting a written request to the Department,

(b) No later than 10 calendar days after license issuance, the designated account manager shall:

...

(3) Complete the credentialing process to establish a login....

1 13. Title 4 of the California Code of Regulations, section 17801 states:

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

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

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

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

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

19 14. Title 4 of the California Code of Regulations, section 17809 states:

20 (a) When an accusation recommending disciplinary action against a licensee
21 has been filed pursuant to Business and Professions Code section 26031, the
22 accusation shall be served on the licensee in accordance with Government Code
23 section 11505.

24 (b) A hearing shall be conducted in accordance with the provisions of chapter 5
25 (commencing with section 11500) of part 1 of division 3 of title 2 of the Government
26 Code to determine if cause exists to take action against the licensee. At the hearing,
27 the Department shall have all of the powers granted by the statutes cited above and by
28 the Business and Professions Code.

(c) If a hearing on an accusation against a licensee results in a finding that the
licensee has committed any of the acts or omissions constituting grounds for
disciplinary action, the Department may order the license revoked, suspended outright
for a specified period of time, or suspended on probationary restriction for a specified
period of time, including terms and conditions of probation the Department considers
appropriate on the basis of its findings, impose a fine, or any combination thereof.
The Department may also issue other lawful orders it considers appropriate on the
basis of its findings.

COST RECOVERY

15. Section 26031.1 of the Code states that:

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

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

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

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

18 (e) In any action for recovery of costs, proof of the department's decision shall
19 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
22 under this section.

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

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

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

FACTUAL ALLEGATIONS

16. On or about March 17, 2023, the Department issued Adult-Use and Medicinal
Distributor License Number C11-0001803-LIC to Green Light Distribution Associates, Inc.
(Respondent) with Ellie Taj as Owner. Respondent was required to identify and designate an
owner of its commercial cannabis business as the track and trace system account manager. The
designated account manager was required to complete the credentialing process to establish a
login within ten (10) calendar days of the license issue date, or by March 27, 2023.

1 17. On April 12, 2023, a Department representative emailed a California Cannabis Track
2 and Trace System (CCTT) Reminder to Owner Ellie Taj's designated email account. In that
3 email, Owner Taj was identified as the account manager for Respondent's Adult-Use and
4 Medicinal Distributor License and was given notice to immediately complete the mandatory
5 credentialing process, complete new user training, and email METRC to request access to the
6 CCTT system. In the April 12, 2023 email, Owner Taj was notified that engaging in commercial
7 cannabis activity prior to completing these requirements may result in disciplinary action against
8 the license.

9 18. On May 9, 2023, Respondent and Owner Taj were served electronically and via U.S.
10 Mail with a Notice to Comply for failure to complete the credentialing process to establish a login
11 for the CCTT System.

12 19. As of the date of filing, Respondent has failed to respond to the Department and/or
13 completed the required credentialing process.

14 **CAUSE FOR DISCIPLINE**

15 (Failure to Complete the Credentialing Process – CCTT System)

16 20. Respondent is subject to disciplinary action under Code section 26030, subdivisions
17 (a) and (e), in that it failed to comply with the provisions of Title 4 of the California Code of
18 Regulations, section 15048, subdivision (b)(3), which requires the designated account manager to
19 complete the credentialing process within ten (10) calendar days after license issuance.
20 Respondent's noncompliance is more particularly alleged in paragraphs 16 through 19, above,
21 which are hereby incorporated by reference and realleged as if fully set forth herein.

22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

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

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director issue a decision;

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Adult-Use and Medicinal Distributor License Number C11-0001803-LIC to Green Light Distribution Associates, Inc. (Respondent) with Ellie Taj as Owner;
2. Ordering Respondent Green Light Distribution Associates, Inc. (Respondent) with Ellie Taj as Owner, to pay the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1; and
3. Taking such other and further action as deemed necessary and proper.

DATED: 01/31/2024

Jeff Merriman

JEFF MERRIMAN
Deputy Director, Compliance Division
Department of Cannabis Control
State of California
Complainant

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

Exhibit 2

Notice of Defense No. DCC23-0001958-INV

BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
OF THE STATE OF CALIFORNIA

In the Matter of the Accusation Against:

GREEN LIGHT DISTRIBUTION
ASSOCIATES, INC.,
Ellie Taj, Owner
8380 Miramar Mall, STE 222
San Diego, CA 92121

License Number CLL-0001803-LIC

Respondent.

Case No. DCC23-0001958-INV

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

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

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

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

Date:

2.28.24

Print Your Name:

Ellie Taj

Your Signature:

Ellie Taj

Respondent's Mailing Address:

8380 Miramar Mall #222

San Diego CA 92121

Phone:

352-361-2344

E-mail:

miramar@aj.com

Check one box:

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

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

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

Check box if applicable:

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

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

SD2023 803432
GREEN LIGHT ACCUSATION PACKET 020124.DOCX

PROOF OF SERVICE

Case Name: GREEN LIGHT DISTRIBUTION ASSOCIATES INC.
DCC Case No. DCC23-0001958-INV
License Number: CII-0001803-LIC

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 August 9, 2024, I served the within documents:

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.
- VIA FIRST CLASS 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 first class mail to be completed upon the following business day.

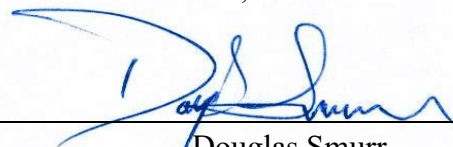
Ellie Taj, Owner
8380 Miramar Mall, Ste. 222
San Diego, CA 92121
Email: Miramarmba@gmail.com

Harinder 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 am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

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 August 9, 2024, at Rancho Cordova, California.



Douglas Smurr