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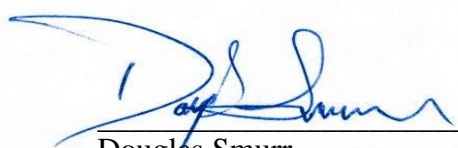
**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
OF THE STATE OF CALIFORNIA**

In the Matter of the Accusation Against: ) CASE NO. DCC23-0005064-COMP  
)  
) **ORDER ADOPTING STIPULATED**  
) **SETTLEMENT AS FINAL DECISION**  
)  
SABZI HILL, INC.; )  
RAMI KASHANI, OWNER )  
10019 YUCCA RD # 9965 )  
ADELANTO, CA 92301-2242 )  
)  
Cannabis - Distributor License )  
No. C11-0001513-LIC )  
)  
)  
Respondent. )

The Department of Cannabis Control hereby adopts the attached Stipulated Settlement and Order, as its Final Decision in this matter.

This Order shall become effective on September 27, 2024.

IT IS SO ORDERED, August 28, 2024.

  
\_\_\_\_\_  
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  
JOSHUA B. EISENBERG  
4 Supervising Deputy Attorney General  
State Bar No. 279323  
5 1300 I Street, Suite 125  
P.O. Box 944255  
6 Sacramento, CA 94244-2550  
Telephone: (916) 210-6115  
7 Facsimile: (916) 327-8643  
*Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **SABZI HILL, INC.;**  
14 **RAMI KASHANI, OWNER**  
15 **10019 YUCCA RD # 9965**  
**ADELANTO, CA 92301-2242**

16 **Cannabis - Distributor License**  
17 **No. C11-0001513-LIC**

18 Respondent.

Case No. DCC23-0005064-COMP

**STIPULATED SETTLEMENT AND  
ORDER**

19  
20  
21 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
22 entitled proceedings that the following matters are true:

23 **PARTIES**

24 1. Jeff Merriman (Complainant) was the Deputy Director of the Compliance Division of  
25 the Department of Cannabis Control (Department). He brought the above-referenced action  
26 solely in his official capacity but has since left the Department. Nadalie Meadows-Martin, Acting  
27 Branch Chief of the Investigative Services Branch, in her official capacity, is now the  
28

1 Complainant in this matter and is represented in this matter by Rob Bonta, Attorney General of  
2 the State of California, by Harinder K. Kapur, Senior Assistant Attorney General.

3 2. Respondent Sabzi Hill, Inc.; Rami Kashani, Owner (Respondent) is represented in  
4 this proceeding by attorney Tatyana Brenner, Esq., Katchko, Vitiello & Karikomi, PC, whose  
5 address is: 11835 W. Olympic Boulevard, Suite 860E, East Tower, Los Angeles, CA 90064

6 3. On or about April 8, 2022, the Department issued Cannabis - Distributor License  
7 No. C11-0001513-LIC to Respondent. The Cannabis - Distributor License was in full force and  
8 effect at all times relevant to the charges brought in Accusation No. DCC23-0005064-COMP, and  
9 will expire on April 8, 2025, unless renewed.

### 10 **JURISDICTION**

11 4. Accusation No. DCC23-0005064-COMP was filed before the Department, and is  
12 currently pending against Respondent. The Accusation and all other statutorily required  
13 documents were properly served on Respondent on October 12, 2023.

14 5. Having received no Notice of Defense contesting the Accusation, the Department  
15 proceeded with a Default Decision and Order on May 21, 2024, which was adopted by the  
16 Director, or her designee, as the Decision and Order with an effective date of June 20, 2024.

17 6. On or about June 5, 2024, the Default Decision and Order was vacated following a  
18 request from Respondent.

19 7. A copy of Accusation No. DCC23-0005064-COMP is attached hereto as Exhibit A,  
20 and incorporated herein by reference.

### 21 **ADVISEMENT AND WAIVERS**

22 8. Respondent has carefully read, fully discussed with counsel, and understands the  
23 charges and allegations in Accusation No. DCC23-0005064-COMP. Respondent has also  
24 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
25 Settlement and Order.

26 9. Respondent is fully aware of its legal rights in this matter, including the right to a  
27 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine  
28 the witnesses against them; the right to present evidence and to testify on its own behalf; the right

1 to the issuance of subpoenas to compel the attendance of witnesses and the production of  
2 documents; the right to reconsideration and court review of an adverse decision; and all other  
3 rights accorded by the California Administrative Procedure Act and other applicable laws.

4 10. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
5 every right set forth above.

6 **CULPABILITY**

7 11. Respondent admits the truth of each and every charge and allegation in Accusation  
8 No. DCC23-0005064-COMP.

9 12. Respondent agrees that its Cannabis - Distributor License is subject to discipline and  
10 agrees to be bound by the Department's imposition of discipline as set forth in the Order below.

11 **CONTINGENCY**

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

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

25 15. In consideration of the foregoing admissions and stipulations, the parties agree that  
26 the Department may, without further notice or formal proceeding, issue and enter the following  
27 Order:  
28

**ORDER**

1  
2           1.       Respondent's appeal of Accusation No. DCC23-0005064-COMP and request for  
3 administrative hearing is deemed withdrawn and any further appeal is waived.

4           2.       Respondent shall pay an administrative fine in the amount of three thousand  
5 dollars (\$3,000.00) within 30 days of the effective date of the Decision and Order.

6           3.       Respondent shall pay to the Department costs associated with its investigation and  
7 enforcement pursuant to Business and Professions Code section 26031 and California Code of  
8 Regulations, title 4, section 17813, in the amount of \$ 2,716.25 within 30 days of the effective  
9 date of the Decision and Order.

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

13           By U.S. Postal Service:

Department of Cannabis Control  
Attn: Cashiers  
P.O. Box 419106  
Rancho Cordova, CA 95741-9106

16           By FedEx or UPS:

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

19  
20           Failure to complete the payment or comply with the above terms of this order shall  
21 result in suspension or non-renewal of Respondent's Distributor License No. C11-0001513-LIC  
22 and denial of any other license sought, as the DCC deems appropriate. Failure to complete the  
23 payment or comply with the terms of this Order shall result in enforcement of the Order in the  
24 Superior Court.

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**ACCEPTANCE**

I have carefully read the above Stipulated Settlement and Order and have fully discussed it with my attorney, Tatyana Brenner, Esq. I understand the stipulation and the effect it will have on my Cannabis - Distributor License No. C11-0001513-LIC. I enter into this Stipulated Settlement and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department of Cannabis Control.

DATED: 07/11/2024

  
\_\_\_\_\_  
SABZI HILL, INC.; RAMI KASHANI, OWNER  
*Respondent*

I have read and fully discussed with Respondent Sabzi Hill, Inc.; Rami Kashani, Owner the terms and conditions and other matters contained in the above Stipulated Settlement and Order. I approve its form and content.

DATED: July 11, 2024

  
\_\_\_\_\_  
TATYANA BRENNER, Esq.  
*Attorney for Respondent*

**ENDORSEMENT**

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

DATED: July 11, 2024

Respectfully submitted,

ROB BONTA  
Attorney General of California



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

LA2023802737

**Exhibit A**

**Accusation No. DCC23-0005064-COMP**

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 JOSHUA B. EISENBERG  
Supervising Deputy Attorney General  
4 State Bar No. 279323  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-6115  
Facsimile: (916) 327-8643  
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:

Case No. DCC23-0005064-COMP

13 **SABZI HILL, INC.**  
**Rami Kashani, Owner**  
14 **10019 Yucca Road # 9965**  
15 **Adelanto, CA 92301**

**ACCUSATION**

16 **License Number C11-0001513-LIC**

17 Respondent.

18  
19 **PARTIES**

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 April 8, 2022, the Department issued Adult-Use Distributor License  
24 Number C11-0001513-LIC to Sabzi Hill, Inc. (Respondent) with Rami Kashani as Owner. On or  
25 about April 8, 2023, the Adult-Use Distributor License Number C11-0001513-LIC was renewed.  
26 The Adult-Use Distributor License was in full force and effect at all times relevant to the charges  
27 brought herein and will expire on April 8, 2024, unless renewed.  
28



**JURISDICTION**

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 state:

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 9. Section 26034 of the Code states:

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

10 **STATUTORY PROVISIONS**

11 10. Section 26030 of the Code states:

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

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

16 ...

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

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

22 **REGULATORY PROVISIONS**

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

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

28 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  
enforcement costs up to the date of the hearing, including, but not limited to, charges  
imposed by the Attorney General.

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

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

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

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

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

26 (g) All costs recovered under this section shall be considered a reimbursement  
27 for costs incurred and shall be deposited into the Cannabis Control Fund to be  
28 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 April 8, 2022, the Department issued Adult-Use Distributor License  
Number C11-0001513-LIC to Sabzi Hill, Inc. (Respondent) with Rami Kashani 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 April 18, 2022.




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2. Ordering Respondent Sabzi Hill, Inc. (Respondent) with Rami Kashani 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: October 9, 2023

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

**PROOF OF SERVICE**

Case Name: In the Matter of the Accusation Against: SABZI HILL, INC.  
DCC Case No. DCC23-0005064-COMP  
License Number: C11-0001513-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 28, 2024, I served the within documents:

**ORDER ADOPTING STIPULATED SETTLEMENT AS FINAL DECISION**

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

Tatyana Brenner, Esq.  
Katchko, Vitiello & Karikomi, PC  
11835 W. Olympic Boulevard, Suite 860E, East Tower  
Los Angeles, CA 90064  
E-Mail: tb@kvklawyers.com

Harinder Kapur  
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 28, 2024, at Rancho Cordova, California.



---

Lillian Quynn