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BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ZANNA USA, LLC;** **DAN KOHANARIEH, DRP/OWNER,** Respondent.	Case No. DCC26-0000009-INV **STATEMENT TO RESPONDENT** [Gov. Code §§ 11504, 11505(b)]

TO RESPONDENT:

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

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

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

Anna Nguyen
Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004

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

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

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

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

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

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

NOTICE REGARDING STIPULATED SETTLEMENTS

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

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

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

If you are interested in pursuing this alternative to a formal administrative hearing, or if you have any questions, you or your attorney should contact Deputy Attorney General Anna Nguyen at the earliest opportunity.

Dated: April 27, 2026

ROB BONTA
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BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA

In the Matter of the Accusation Against**:** **ZANNA USA, LLC;** **DAN KOHANARIEH, DRP/OWNER** **17337 Muskrat Ave, Unit #6** **Adelanto, CA 92301** **Cannabis - Cultivation Medium Indoor** **License No. CCL19-0003299** **Cannabis - Distributor** **License No. C11-0000743-LIC** Respondent.	Case No. DCC26-0000009-INV **ACCUSATION**

Complainant alleges:

PARTIES

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

2. On or about October 31, 2019, the Department issued Cannabis - Cultivation Medium Indoor License No. CCL19-0003299 (Cultivation License) to Zanna USA, LLC (Respondent) with Dan Kohanarieh, Designated Responsible Party and (DRP/Owner Kohanarieh). The

Cannabis - Cultivation Medium Indoor License was in full force and effect at all times relevant to the charges brought herein and will expire on February 28, 2027, unless renewed.

3. On or about July 10, 2019, the Department issued Cannabis - Distributor License No. C11-0000743-LIC (Distributor License) to Respondent with DRP/Owner Kohanarieh. The Cannabis - Distributor License was in full force and effect at all times relevant to the charges brought herein and will expire on July 9, 2026, unless renewed.

JURISDICTION

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

5. 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.

6. 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.

7. 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.

8. 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. Those rules and regulations shall be consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of Marijuana Act.

9. Section 26031 of the Code states:

> (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.

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

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

(d) The suspension or expiration of a license issued by the department, or its suspension, forfeiture, or cancellation by order of the department or by order of a court of law, or its surrender without the written consent of the department, shall not, 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 proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.

10. 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

11. Section 26030 of the Code states, in part:

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 the department pursuant to this division.

…

12. Section 26039.3 of the Code states, in part:

…

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

…

13. Section 26039.5 of the Code states in part:

…

(b) It is unlawful to cultivate, process, manufacture, sell, deliver, hold, or offer for sale cannabis or a cannabis product that is misbranded.

…

(d) It is unlawful to receive in commerce cannabis or a cannabis product that is misbranded or to distribute, deliver, or offer for delivery any such cannabis or cannabis product.

14. Section 26039.6 of the Code states, in part:

…

(c) It is unlawful to adulterate cannabis or a cannabis product.

(d) It is unlawful to receive in commerce cannabis or a cannabis product that is adulterated or to distribute, deliver, or proffer for delivery any such cannabis or cannabis product.

REGULATORY PROVISIONS

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

…

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

16. Title 4 of the California Code of Regulations, section 15000.7, states in part:

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

17. Title 4 of the California Code of Regulations, section 15027, states in part:

(a) A licensee shall not, without the prior written approval of the Department, make a physical change, alteration, or modification of the licensed premises that materially or substantially alters the licensed premises or the use of the licensed premises from the premises diagram originally filed with the license application. A licensee whose licensed premises is to be materially or substantially changed, modified, or altered is responsible for filing a request for premises modification with the Department.

…

18. Title 4 of the California Code of Regulations, section 15302, states, in part:

(a) A licensed distributor shall ensure that all batches of cannabis or cannabis products are stored separately and distinctly from other batches of cannabis or cannabis products on the licensed distributor's premises.

…

19. Title 4 of the California Code of Regulations, section 15305, states, in part:

…

(c) The sampling shall be video-recorded with the batch number stated verbally or in writing on the video at the beginning of the video and a visible time and date indication on the video recording footage. The video recordings shall be maintained for 90 calendar days by the licensed distributor.

…

20. Title 4 of the California Code of Regulations, section 16307, states in part:

(a) Licensed cultivators shall comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation.…

21. Title 4 of the California Code of Regulations, section 16310, states in part:

(a) The licensed cultivator shall develop a pest management plan that includes:

(1) The product name and active ingredient(s) of all pesticides to be applied to cannabis; …

COST RECOVERY

22. Section 26031.1 of the Code states:

(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.

(b) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the department or its designated

representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

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

(d) If an order for recovery of costs is made and timely payment is not made as 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.

(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

Prior Notices Issued to Respondent

23. On December 18, 2024, the Department issued a Notice to Comply (NTC) to Respondent's Cultivation License for (1) failing to accurately maintain an accurate Pest Management Plan (PMP), (2) failing to properly tag immature plant lots, (3) failing to keep immature plant lots separate and distinct from other immature plant lots, and (4) failing to properly reconcile its inventory. In addition, a prior NTC was issued on December 18, 2023, to Respondent's Cultivation License for two violations including (1) failing to adhere to its

approved licensed premises diagram, and (2) failing to follow its approved PMP by using a pesticide that was not listed, nor documented, on their PMP.

24. On December 19, 2024, the Department issued a NTC to Respondent's Distributor License for (1) failing to follow testing samples regulations and "cherry picking" the cannabis for the laboratory, (2) having inaccurate date and time stamps on surveillance video footage, (3) failing to ensure that trade samples provided to employees were tested and received a passing Certificate of Analysis (COA), (4) failing to store all inventory within the designated licensed premises, (5) failing to properly tag all cannabis flower with a California Cannabis Track and Trace (CCTT) unique identifier (UID), and (6) failing to submit a request to alter its licensed premises. A prior NTC was also issued on March 18, 2022, for four violations that were identical to violations (4)-(6) listed above, and an additional violation of failing to perform record reconciliations.

Current Violations

25. On January 8, 2026, Department staff conducted an unannounced inspection at Respondent's licensed premises. Department staff met with distribution manager, N.F. (Manager N.F.), who shared that Chief Compliance Officer R.K. (CCO R.K.) and DRP/Owner Kohanarieh[1] had been contacted and were on their way to the licensed premises. Manager N.F. accompanied Department staff as they began inspection of Respondent's licensed premises.

26. Upon entering the Distributor License designated area, Department staff noted that this area was different from Respondent's most recent, and approved, premises diagram. Manager N.F. stated that due to a lack of space, Respondent had relocated the Distributor License area within the licensed premises. Department staff also observed freezers labeled "Distribution Freezer" located in a hallway, but the placement of these freezers was also not accurately documented on Respondent's most recent, and approved, premises diagram. Manager N.F. explained that, due to a lack of space, Respondent had relocated these freezers from the Distributor License area within the licensed premises. Although Department staff requested that

[1] Owners, as defined by Business and Professions Code section 26001, subdivision (av), associated with Respondent are DRP/Owner Kohanarieh, Ebrahim Jebreel, Limor Amrani, Qudsia Sadiq, and Roya Imanoel.

Respondent provide an updated, and approved, licensed premises diagram, Respondent provided only the same inaccurate premises diagram that was previously approved and associated with Respondent's licensed premises.

27. While still in the Distributor License area, Department staff observed that Respondent was storing cannabis product that failed regulatory compliance testing in the same boxes and totes with cannabis product that passed regulatory compliance testing, with no clear distinction between the two. Manager N.F. confirmed that Respondent could not differentiate between cannabis products identified either as test-passed or test-submitted due to cannabis products being mixed/combined prior to separation and identification. Manager N.F. then stated that a recently submitted batch of cannabis flower had failed regulatory compliance testing. However, when Department staff asked Manager N.F. to locate that batch, Manager N.F. was unable to due to the lack of proper separation and identification of the cannabis products stored in the same boxes and totes.

28. Department staff assisted Manager N.F., by utilizing the CCTT tags UID in Respondent's CCTT account, which led to the discovery of ten (10) batches of cannabis flower that had failed regulatory compliance testing (failed batch), but were found stored together with other test-passed, test-submitted, and untested cannabis and cannabis products. Department staff advised Manager N.F. that the failed batch must be placed under quarantine. Manager N.F. then separated and labeled the failed batch with quarantine signs. When Department staff asked if a remediation plan had been submitted by Respondent for the failed batch, Manager N.F. stated he was unsure whether a remediation plan had been submitted. Department staff then conducted a CCTT account search of the failed batch and their associated COA, which revealed it failed for Category I Pesticide Analyte Dichlorvos (DDVP)[2].

[2] DDVP or dichlorvos is an insecticide used for fumigation, a method of pest control that completely fills an area with gaseous pesticides to suffocate the pests within. It is registered for use in California and US EPA has established tolerances on several agricultural commodities. Dichlorvos affects the body by inhibiting the breakdown of acetylcholine, a chemical responsible for nerve transmission within the body, causing a prolonged stimulation of nerves and muscles. Human exposure can occur through ingestion, inhalation, and dermal contact. Acute toxicity symptoms may include headache, drowsiness, confusion, restlessness, aching eyes, small pupils, sweating, tearing, gritting of teeth, nausea, abdominal cramping, diarrhea, vomiting, muscle

(continued…)

29. During the inspection of the cultivation and manufacturing areas of the premises, Department staff observed Respondent's employees trimming cannabis flower in the designated manufacturing area even though the cannabis flower belonged to the Cultivation License in the CCTT system. In the cultivation irrigation area, there was a marked pesticide storage cabinet that contained multiple pesticides, including Pylon TR aerosol cans that contain chlorfenapyr[3], a Category I Pesticide Insecticide. The pesticide storage cabinet also had a leaking container with an unknown substance and an unlabeled spray bottle.

30. When CCO R.K. and DRP/Owner Kohanarieh arrived, Department staff went to the main office area to interview CCO R.K. and the head of cultivation, A.G. During this interview, CCO R.K. and A.G. admitted to using "Hot Shot" pesticide strips (pesticide strips) that contained DDVP in the grow room approximately two months before the failed batch failed regulatory compliance testing. CCO R.K. and A.G. stated that they were unaware that the pesticide strips contained DDVP and therefore did not accurately record the use of pesticide in Respondent's pesticide logs as required. CCO R.K. and A.G. confirmed that the pesticide strips were disposed of after Respondent received the failed batch's test results. CCO R.K. and DRP/Owner Kohanarieh further stated that the pesticide strips were placed above the canopy, and near the fans.

31. Regarding the Pylon TR aerosol cans found in the pesticide storage cabinet, CCO R.K. and A.G. stated that those were delivered to the licensed premises by "construction workers"

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tremors and weakness, chest tightness, wheezing, a bluish discoloration of the skin as a result of lack of oxygen in the blood, convulsions, paralysis, coma, and death if exposed to high enough quantities. When heated to high temperatures, dichlorvos emits toxic gases and vapors including carbon and phosphorus oxides, hydrogen chloride, and phosgene, which are hazardous when inhaled (Department of Pesticide Regulation Memorandum to Jaqueline Campion, Deputy Director, Policy & Research, Department of Cannabis Control, December 18, 2024).

[3] Chlorfenapyr is a pro-insecticide which becomes activated once it enters the target pest. It is used on fruiting vegetables and ornamentals in greenhouses, in residential sites, and in medical sites for bed bug treatment. Currently, it is registered for use in California and US EPA has established tolerances for several agricultural commodities. Chlorfenapyr works by disrupting the energy production in insects but little is known how it causes toxicity to humans. Exposure to chlorfenapyr can occur through ingestion, inhalation, and dermal contact. It can be irritating to the eyes. When heated to high temperatures, chlorfenapyr emits toxic vapors of hydrogen chloride, hydrogen fluoride, hydrogen bromide gases, and carbon and nitrogen oxides which are hazardous when inhaled (Department of Pesticide Regulation Memorandum to Jaqueline Campion, Deputy Director, Policy & Research, Department of Cannabis Control, December 18, 2024).

and were not used at the licensed premises nor on Respondent's cannabis plants. They were unable to identify the "construction workers" when asked. Department staff then requested to review Respondent's integrated PMP, County Operator Identification Number card, pesticide applicator certificate, written pesticide list, and pesticide application records. The review confirmed that Respondent did not disclose the use of the following pesticides: DDVP, and Pylon TR or chlorfenapyr.

32. Department staff returned to the cultivation irrigation area to take photographs of the pesticide storage cabinet and saw that the Pylon TR aerosol cans were missing. Department staff returned to the main office to inform CCO R.K. and DRP/Owner Kohanarieh of their discovery, and A.G. stated that the Pylon TR aerosol cans were moved because they were incorrectly stored in the pesticide storage cabinet. A.G. then called an unknown individual regarding the location of the missing Pylon TR aerosol cans and, in turn told Department staff that they were stored behind a large box of fertilizer. Department staff asked DRP/Owner Kohanarieh to show them surveillance footage of the cultivation irrigation area for the past hour, which he did, and it showed A.G. entering the cultivation irrigation area at 11:06 a.m., removing the Pylon TR aerosol cans, and placing them behind the large box of fertilizer.

33. Based on this information, Department staff determined that there was probable cause to believe that the cannabis products stored at Respondent's Distributor Licensed area, and all plants stored at Respondent's Cultivation License area, were adulterated and therefore, would be embargoed. Department staff then explained the embargo process to DRP/Owner Kohanarieh and concluded the inspection.

34. On January 9, 2026, the Initial Embargo Notice (IEN) for Respondent's Cultivation License and Distributor License areas of the licensed premises were emailed to DRP/Owner Kohanarieh, to be signed. On January 12, 2026, DRP/Owner Kohanarieh signed and emailed the IEN to Department staff.

35. On January 13, 2026, Department staff emailed DRP/Owner Kohanarieh requesting video surveillance footage of the sample pickup for the failed batch. The email included a list of the item names along with their corresponding UID tags. On January 14, 2026, Respondent

provided video surveillance footage, but it did not cover the entire sampling event, nor did it show which testing laboratory employee entered the sampling area.

36. On January 15, 2026, Department staff reviewed photographs taken of Respondent's pesticide storage cabinet from January 8, 2026, and identified an additional jug of fungicide called "Reset." Respondent did not disclose the use of Reset (or Pylon TR aerosol cans) in its pest and disease control plan and/or its PMP. Reset is a prohibited pesticide to use on cannabis plants according to the California Department of Pesticide Regulation (DPR).

37. On January 15, 2026, Department staff emailed a Supplemental Notice of Embargo (SNE) to Respondent for its Cultivation License and Distributor License, which required a response by or on January 22, 2026. Later that same day, Department staff reviewed Respondent's updated pest and disease control plan and PMP. Department staff identified seven (7) pesticides disclosed in Respondent's plans[4] that are prohibited for use on cannabis in California per the DPR[5]: Double Nickle LC, Green Cleaner, BotaniGard ES, Azera, M-Pede, Suffoil-X, and Milstop.

38. On January 16, 2026, Department staff received an email that included a remediation plan from Respondent regarding the SNE. Department staff determined that the remediation plan did not address the issues that led to issuance of the IEN.

39. Department staff contacted S.M., the San Bernardino County Deputy Agricultural Commissioner (County Agricultural Commissioner), to inquire whether Respondent (1) ever met with the County Agricultural Commissioner, (2) obtained an Operator Identification Number (OIN), (3) obtained a Site Identification Number (SIN), and (4) whether the County Agricultural Commissioner's Office or District Attorney has considered any enforcement action related to the use of pesticide strips or Pylon TR aerosol cans.

[4] Respondent submitted a PMP on December 6, 2023, which disclosed the use of six (6) pesticides that were prohibited for use by DPR (Grandevo WDG, M-Pede, BotaniGard 22WP, SuffOil X, MilStop and Venerate).

[5] *See* https://www.cdpr.ca.gov/cac-letter/list-of-products-legal-to-use-on-cannabis/

40. On January 20, 2026, the County Agricultural Commissioner stated that Respondent holds an OIN 3642015 that expired on December 31, 2025, and a SIN 45985107, for Respondent's licensed premises.

41. On January 21, 2026, Department staff emailed a Notice of Embargo Determination (NED) to Respondent for its Cultivation License and Distributor License. The NED required Respondent to submit its destruction plan by January 28, 2026. On January 22, 2026, Respondent responded to the NED acknowledging that the remediation plan was not sufficient, asking the Department to reconsider its decision, and provided additional corrective actions to Respondent's previously submitted remediation plan.

42. On January 22, 2026, Department staff reviewed Respondent's updated remediation plan, and determined that it was insufficient to properly address the embargo issues, and therefore, the NED issued on January 21, 2026, remained in effect. Moreover, Respondent's updated remediation plan revealed that it conducted whole-plant testing and sampling of embargoed cannabis without receiving prior approval from the Department. The Department had previously denied Respondent's request to move or remove embargoed cannabis with the limited exception of allowing Respondent to trim on January 15, 2026, to address a potential fire hazard without the removal of certain cannabis. Therefore, the Department requested that Respondent immediately provide all records related to the testing and sampling of embargoed cannabis, including video surveillance footage, invoices, COAs, and chain-of-custody logs, by 5:00 p.m. on January 23, 2026. Respondent was also ordered not to move, remove, or sample embargoed cannabis, and to strictly comply with activities previously authorized by the Department.

43. On January 23, 2026, Respondent informed Department staff that there was no responsive record to the Department's request as Respondent did not move, remove, nor test any cannabis – as the whole-plant testing and sampling was only included as part of its remediation plan, and Respondent requested the immediate commencement of condemnation proceedings.

44. On January 26, 2026, Respondent requested an extension to submit a destruction plan, and on January 27, 2026, Department staff granted Respondent an extension to submit its destruction plan by 5:00 p.m. on February 2, 2026.

45. On January 28, 2026, Department staff followed up with DRP/Owner Kohanarieh regarding the January 13, 2026 request for complete video surveillance footage of the sample pickup for the failed batch. Department staff reminded DRP/Owner Kohanarieh that the video surveillance footage needed to include the entire sampling event and associated activities, including all commercial cannabis rooms and the testing laboratory employee entering and exiting the licensed premises.

46. On February 3, 2026, after the revised deadline had already passed, Respondent submitted a destruction plan on behalf of its Cultivation License that only included four (4) line items out of the forty-eight (48) line items identified in the SNE.

47. On February 4, 2026, Department staff received updated video surveillance footage from DRP/Owner Kohanarieh that showed a testing laboratory employee taking samples from each tote, weighing out each sample, placing samples into a Ziploc bag, labeling each Ziploc bag with a marker, and placing the Ziploc bags into a black rolling case. After each sample was taken, the testing laboratory employee removed the samples from the black rolling case and applied CCTT tags UID to each one. The testing laboratory employee did not state the batch numbers verbally or show them in writing on camera as required.

48. On February 18, 2026, Department staff arrived at Respondent's licensed premises to witness the Voluntary Condemnation and Destruction (VC&D) of four (4) line items from the SNE. When Department staff inspected the remaining embargoed cannabis flower in Respondent's Cultivation License area, they discovered that the embargoed cannabis plants in flower rooms 3, 5, and 11, had been cut down and hung to dry. Although Respondent had submitted a prior written request on February 10, 2026, to harvest those three (3) rooms, their request was denied on February 13, 2026. During an interview with Respondent's Chief Operating Officer S.L. (COO S.L.), they stated that the harvesting was done due to mold concerns and that Respondent believed that mitigation efforts were permitted. COO S.L. confirmed that the harvesting of flower rooms 3, 5, and 11 occurred between January 16 and January 20, 2026.

49. On February 19, 2026, Department staff was notified by its Remediation and Recalls Unit that two (2) additional batches of packaged cannabis flower cultivated by Respondent had

tested positive for DDVP and Pyrethrins insecticide. The COA for the first batch[6] initiated a package trace of the source UID[7] which identified six (6) additional cannabis strains that were cultivated and harvested on the same date and at the same location as the first batch. The COA for the second batch[8] initiated a package trace of the source UID[9] which identified five (5) different strains that were cultivated and harvested on the same date and at the same location as the second batch.

50. On February 20, 2026, the Department denied Respondent's written request, dated February 19, 2026, to harvest plants that were under embargo.

51. On February 25, 2026, the Agricultural Commissioner informed Department staff that an inspection was conducted of Respondent's licensed premises and it was determined that Respondent did not (1) accurately and timely report its use of pesticide in violation of California Code of Regulations, title 3, section 6622, (2) have proper storage of personal protective equipment (PPE) in violation of California Code of Regulations, title 3, sections 6626 and 6627, (3) accurately record initial and annual handler training in violation of California Code of Regulations, title 3, section 6724 and (4) assure field worker training in violation of California Code of Regulations, title 3, section 6764.

52. The Agricultural Commissioner also issued to Respondent an inspection report and violation notice that included the following required corrective actions: Respondent must (1) report all pesticide applications to the county commissioner by the 10th day of the month following the application, (2) clean PPE must be stored separately from personal clothing in a clean, pesticide-free, designated area when not in use, (3) document initial and annual required training for pesticide handlers; records must include the training date, content covered, job assignment, training materials used, employer name, trainer name, and be verified by the employee's printed name and signature, and (4) ensure employees working in treated fields must

[6] Whoopi & Maya Flower 3.5g Gas Face #7.

[7] UID 1A40603000095A3000003914.

[8] Whoopi & Maya Flower 3.5g Grape Crush.

[9] UID 1A40603000095A3000003912.

receive training within the past 12 months, in a language or manner they understand, before beginning work in the treated area.

53. On April 1, 2026, Department staff conducted an inspection of the previously embargoed cannabis pursuant to Respondent's approved request from March 24, 2026, to VC&D eighteen (18) line items from the SNE. While at the licensed premises, Department staff observed Respondent was using an area designated as "harvest storage" on its approved premises diagram to house clones and immature cannabis plants. When Department staff asked, CCO S.L. explained that since the "mother/clone room" was under embargo, Respondent had decided to use the harvest storage area until the embargo was lifted. CCO S.L. confirmed that Respondent did not submit a request to the Department to modify its premises diagram nor did they receive approval from the Department to operate outside of their already approved premises diagram.

54. COO S.L. stated that Respondent purchased the clones and immature plants from a nursery because its mother plants were under embargo. A review of one of the manifests (Manifest #0010360546) for a receipt of 500 immature plants revealed that they were purchased from a licensee that does not hold a nursery license. Department staff explained to DRP/Owner Kohanarieh and COO S.L. that since the 500 immature plants did not come from a nursery licensee, they could either be placed under embargo, or they could be subject to VC&D. Respondent chose to proceed with a VC&D. Respondent then conducted the VC&D of the 500 immature plants in addition to the eighteen (18) line items from the SNE under Department staff's supervision.

FIRST CAUSE FOR DISCIPLINE

(Breach of Embargo)

55. Respondent is subject to disciplinary action under Code sections 26030, subdivisions (a) and (c), and 26039.3, subdivision (b)(1), in that Respondent breached the terms of the embargo, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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SECOND CAUSE FOR DISCIPLINE

(Misbranded Cannabis)

56. Respondent is further subject to disciplinary action under Code sections 26030, subdivisions (a) and (c), and 26039.5, subdivisions (b) and (d), in that Respondent received in commerce cannabis that is misbranded, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

THIRD CAUSE FOR DISCIPLINE

(Adulterated Cannabis)

57. Respondent is subject to disciplinary action under Code sections 26030, subdivisions (a) and (c), and 26039.6, subdivision (d), in that Respondent received in commerce cannabis that is adulterated, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE

(Unauthorized Licensed Commercial Cannabis Activity)

58. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15000.1 subdivision (c), in that Respondent conducted commercial cannabis activities beyond what was authorized by the license, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FIFTH CAUSE FOR DISCIPLINE

(Storage of Cannabis Inventory)

59. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15000.7, subdivision (a), in that Respondent failed to ensure that all cannabis was stored within the licensed premises, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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/ / /

SIXTH CAUSE FOR DISCIPLINE

(Modification of Licensed Premises)

60. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15027, subdivision (a), in that Respondent failed to obtain prior written approval of the Department prior to making a physical change to the licensed premises, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

SEVENTH CAUSE FOR DISCIPLINE

(Storage of Cannabis or Cannabis Products for Testing)

61. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15302, subdivision (a), in that Respondent failed to ensure that all batches of cannabis or cannabis products were stored separately and distinctly from other batches of cannabis, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

EIGHTH CAUSE FOR DISCIPLINE

(Testing Sample)

62. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 15305, subdivision (c), in that Respondent failed to ensure that sampling event was video recorded with the batch number stated verbally or in writing, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

NINTH CAUSE FOR DISCIPLINE

(Pesticide Use)

63. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 16307, subdivision (a), in that Respondent failed to comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation, as more particularly alleged in paragraphs

25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

TENTH CAUSE FOR DISCIPLINE

(Pest Management Plan)

64. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, section 16310, subdivisions (a)(1), in that Respondent failed to maintain a pest management plan that includes the product name(s) and active ingredient(s) of all pesticides to be applied to cannabis, as more particularly alleged in paragraphs 25 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

PRAYER

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

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Cultivation Medium Indoor License Number CCL19-0003299, issued to Respondent Zanna USA, LLC, with Dan Kohanarieh, Designated Responsible Party and Owner;

2. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis Distributor License Number C11-0000743-LIC, issued to Respondent Zanna USA, LLC, with Dan Kohanarieh, Designated Responsible Party and Owner;

3. Ordering Respondent Zanna USA, LLC, with Dan Kohanarieh, Designated Responsible Party and Owner, to pay the Department of Cannabis Control the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1;

4. Ordering the destruction of cannabis and cannabis goods in the possession of Zanna USA, LLC, with Dan Kohanarieh, Designated Responsible Party and Owner, at Respondent's expense, if revocation of Cannabis - Cultivation Medium Indoor License Number CCL19-

0003299 is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

5. Ordering the destruction of cannabis and cannabis goods in the possession of Zanna USA, LLC, with Dan Kohanarieh, Designated Responsible Party and Owner, at Respondent's expense, if revocation of Cannabis - Distributor License Number C11-0000743-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

6. Taking such other and further action as deemed necessary and proper.

DATED: May 15, 2026

Evelyn Schaeffer

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

SD2026800506

ROB BONTA
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GREGORY M. CRIBBS
Supervising Deputy Attorney General
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Facsimile: (415) 703-1107
E-mail: Anna.Nguyen@doj.ca.gov
Attorneys for Complainant

BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA

In the Matter of the Accusation Against: ZANNA USA, LLC; DAN KOHANARIEH, DRP/OWNER, Respondent.	Case No. DCC26-0000009-INV **REQUEST FOR DISCOVERY**

TO RESPONDENT:

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

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

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and

2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:

a. A statement of a person, other than the Respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that

the act or omission of the Respondent as to this person is the basis for the administrative proceeding;

b. A statement pertaining to the subject matter of the proceeding made by any party to another party or persons;

c. Statements of witnesses then proposed to be called by the Respondent and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

d. All writings and things which the Respondent now proposes to offer in evidence;

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

f. Investigative reports made by or on behalf of the Respondent pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

IN ADDITION, if cost recovery is requested in the pleading prayer, provide all writings which will support any objection which may be made by the Respondent, to Respondent's payment of investigation and enforcement costs to the Board.

For the purpose of this Request for Discovery, "statements" include written statements by the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery should be deemed to authorize the inspection or copying of any writing or thing which is

privileged from disclosure by law or otherwise made confidential or protected as attorney's work product.

Your response to this Request for Discovery should be directed to the undersigned attorney for the Complainant at the address on the first page of this Request for Discovery within 30 days after service of the Accusation.

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

Dated: April 27, 2026

ROB BONTA
Attorney General of California
GREGORY M. CRIBBS
Supervising Deputy Attorney General

Anna Nguyen

ANNA NGUYEN
Deputy Attorney General
Attorneys for Complainant

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BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ZANNA USA, LLC;** **DAN KOHANARIEH, DRP/OWNER,** Respondent.	Case No. DCC26-0000009-INV **NOTICE OF DEFENSE** (Gov. Code §§ 11505 and 11506)

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

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

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

Date: _____
Print Your Name: _____
Your Signature: _____
Respondent's Mailing Address: _____
_____
Phone: _____
E-mail _____

Check one box:

☐ I am represented by counsel, whose name, address and telephone number appear below:
Counsel's Name _____
Counsel's Mailing Address _____
_____
Phone: _____
E-mail: _____

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

Check box if applicable:

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

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

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BEFORE THE
DEPARTMENT OF CANNABIS CONTROL
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ZANNA USA, LLC;** **DAN KOHANARIEH, DRP/OWNER,** Respondent.	Case No. DCC26-0000009-INV **NOTICE OF DEFENSE** (Gov. Code §§ 11505 and 11506)

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

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

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

Date: _____
Print Your Name: _____
Your Signature: _____
Respondent's Mailing Address: _____
_____
Phone: _____
E-mail _____

Check one box:

☐ I am represented by counsel, whose name, address and telephone number appear below:
Counsel's Name _____
Counsel's Mailing Address _____
_____
Phone: _____
E-mail: _____

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

Check box if applicable:

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

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

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COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505

SECTION 11507.5: Exclusivity of discovery provisions

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

SECTION 11507.6: Request for discovery

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports, which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

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DECLARATION OF SERVICE BY E-MAIL and U.S. MAIL

Case Name: **In the Matter of the Accusation against Zanna USA, Inc. and Zanna USA, LLC**

No.: **DCC26-0000009-INV**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. My business address is: 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004. My electronic service address is Robert.Caoile@doj.ca.gov. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On May 18, 2026, I served the attached STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 Copies); and GOVERNMENT CODE SECTION 11507.5, 11507.6 and 11507.7 by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 Copies); and GOVERNMENT CODE SECTION 11507.5, 11507.6 and 11507.7 was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Zanna USA LLC
17337 Muskrat Ave, Unit #6
Adelanto, CA 92301

Dan Kohanarieh, DRP/Owner
6748 Saturn St,
Los Angeles, CA 90035

Orly Kohanarieh, Agent for Service
9301 Wilshire Boulevard, #602
Beverly Hills, California 90210

Email: dan.k@zannausa.com

Email: ykatchko@kvklawyers.com

I declare under penalty of perjury under the laws of the State of California and the United States

of America the foregoing is true and correct and that this declaration was executed on May 18, 2026, at San Francisco, California.

R. Caoile	***/s/ R. Caoile***
Declarant	Signature

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