



Department of
Cannabis Control
CALIFORNIA

Office of the General Counsel
2920 Kilgore Road
Rancho Cordova, CA 95670

May 23, 2025

VIA EMAIL & CERTIFIED MAIL

ESTD LLC, dba FIG & THISTLE APOTHECARY
Nguey Gong Lay, Managing Member
429 Gough Street
San Francisco, CA 94102
ngueylay@msn.com

Jaimie Mak, Esq.
The Meridian Law Firm, PC
4 Embarcadero Ctr., Ste. 1400
San Francisco, CA 94111
jmak@meridianfirm.com

Re: The Citation Against: ESTD LLC, dba FIG & THISTLE APOTHECARY
Case No. DCC24-0000190-INV
Order Adopting Stipulated Settlement and Order as Final Decision

Dear Messrs. Lay and Mak:

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

According to the Order of the Final Decision, Respondent shall make two separate payments: (1) an administrative fine payment of \$10,000.00; and (2) a payment for costs of \$4,291.75.

The Department's Final Decision and Order will be effective on June 26, 2025. Pursuant to this Final Decision and its stipulated settlement, ESTD LLC has waived any right to reconsideration or appeal in this matter.

Sincerely,

Douglas Smurr
Assistant General Counsel
info@cannabis.ca.gov
www.cannabis.ca.gov

1
2
3
4
5
6
7
8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **OF THE STATE OF CALIFORNIA**

11 In the Matter of the Citation Against:) CASE NO. DCC24-0000190-INV
12)
13 ESTD LLC, dba FIG & THISTLE) **ORDER ADOPTING STIPULATED**
14 APOTHECARY; Nguey Gong Lay,) **SETTLEMENT AND ORDER AS FINAL**
15 Managing Member) **DECISION**
16 313 Ivy Street.)
17 San Francisco, CA 94102)
18)
19 Retailer License No. C10-0001172-LIC)
20)
21 Respondent.)
22)
23)
24)
25)
26)
27)
28)

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

31 This Order and Final Decision shall become effective on June 26, 2025.

32 IT IS SO ORDERED, May 23, 2025.

33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

Douglas Smurr
Assistant General Counsel
FOR THE DEPARTMENT OF CANNABIS CONTROL

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
600 West Broadway, Suite 1800
4 San Diego, CA 92101
P.O. Box 85266
5 San Diego, CA 92186-5266
Telephone: (619) 738-9407
6 Facsimile: (619) 645-2061
E-mail: Harinder.Kapur@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Appeal of Citation Issued
Against:

13 **ESTD LLC, DBA FIG & THISTLE**
14 **APOTHECARY; NGUEY GONG LAY,**
15 **MANAGING MEMBER**
16 **313 Ivy Street**
17 **San Francisco, CA 94102**

18 **Retailer License No. C10-0001172-LIC**

19 Respondent.

Case No. DCC24-0000190-INV

**STIPULATED SETTLEMENT OF
CITATION 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) was the Deputy Director of the Compliance Division of
24 the Department of Cannabis Control (Department). He brought the above-referenced action
25 solely in his official capacity but has since left the Department. Evelyn Schaeffer is now the
26 Deputy Director of the Compliance Division of the Department and now the Complainant in her
27 official capacity in this matter, and is represented in this matter by Rob Bonta, Attorney General
28 of the State of California, by Harinder Kapur, Senior Assistant Attorney General.

2. Respondent ESTD LLC, dba Fig & Thistle Apothecary (Respondent) is represented in this proceeding by attorney Jaimie Mak, whose address is: 4 Embarcadero Center, Suite 1400, San Francisco, CA 94111. Respondent is acting in this proceeding through Nguoy Gong Lay, Managing Member, and he has been designated and authorized by Respondent to enter into this agreement on its behalf (hereafter "Authorized Representative").

3. On or about August 9, 2022, the Department issued Retailer License No. C10-0001172-LIC to Respondent. The Retailer License was in full force and effect at all times relevant to the violations in Citation No. DCC24-0000190-INV and was surrendered on December 2, 2024.

JURISDICTION

4. Citation No. DCC24-0000190-INV was filed before the Department and is currently pending against Respondent. The Citation and all other statutorily required documents were properly served on Respondent on January 30, 2024. Respondent timely filed its appeal of the Citation.

5. A true and correct copy of Citation No. DCC24-0000190-INV is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent and its current owners of record and members have carefully read, fully discussed with counsel, and understand the violations found in Citation No. DCC24-0000190-INV. Respondent and its current owners of record and members have also carefully read, fully discussed with counsel, and understand the effects of this Stipulated Settlement of Citation and Order.

7. Respondent and its current owners of record and members are fully aware of their legal rights in this matter, including the right to a hearing on the findings in the Citation; the right to confront and cross-examine the witnesses against them; the right to present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an

adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent and its current owners of record and members voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent understands and agrees that the findings in Citation No. DCC24-0000190-INV, if proven at a hearing, constitute cause for imposing an administrative fine against Respondent.

10. For the purpose of resolving the Citation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the findings in the Citation, and that Respondent and its current owners of record and members hereby gives up the right to contest those findings.

11. Respondent agrees that it is subject to fines and agrees to be bound by the Department's imposition of an administrative fine as set forth in the Order below.

CONTINGENCY

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

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

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

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

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

ORDER

1. **WITHDRAWAL OF APPEAL.** Respondent's appeal of Citation No. DCC24-0000190-INV and request for administrative hearing is deemed withdrawn and any further appeal is waived.

2. **PAYMENT OF FINE.** Respondent shall pay to the Department an administrative fine in the amount of ten-thousand dollars (\$10,000.00) within 30 days of the effective date of the Order.

3. **PAYMENT OF COSTS OF ENFORCEMENT.** Respondent shall pay to the Department costs associated with its investigation and enforcement pursuant to Business and Professions Code sections 26031.5 in the amount of four thousand two hundred and ninety-one dollars and seventy-five cents (\$4,291.75) within 30 days of the effective date of the Order.

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

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

6 By FedEx or UPS:
7 Department of Cannabis Control
8 Attn: Cashiers
9 2920 Kilgore Road
10 Rancho Cordova, CA 95670-6157

11 5. Failure to complete the payments or comply with the above terms of this Order shall
12 result in an automatic forty-five (45) day summary suspension of Respondent's Retailer License
13 No. C10-0001503-LIC, and Respondent waives any right to appeal the summary suspension or
14 request a hearing in the matter.

15 **ACCEPTANCE**

16 I have carefully read the above Stipulated Settlement of Citation and Order and have fully
17 discussed it with my attorney, Jaimie Mak. I understand the stipulation and the effect it will have
18 on my Retailer License, number C10-0001503-LIC. I enter into this Stipulated Settlement of
19 Citation and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
20 Decision and Order of the Department of Cannabis Control.

21 DATED: MAY 12 2025

22 
23 ESTD LLC, DBA FIG & THISTLE APOTHECARY;
24 NGUEY GONG LAY, Managing Member/Authorized
25 Representative
26 Respondent
27
28

1 I have read and fully discussed with Respondent ESTD LLC, dba Fig & Thistle
2 Apothecary; Nguey Gong Lay, Managing Member, the terms and conditions and other matters
3 contained in the above Stipulated Settlement of Citation and Order. I approve its form and
4 content.

5
6 DATED: May 12, 2025



JAIME MAK
Attorney for Respondent

8
9 **ENDORSEMENT**

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

12 DATED: May 14, 2025

Respectfully submitted,

14 ROB BONTA
Attorney General of California



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

Exhibit A

Citation No. DCC24-0000190-INV



CITATION, FINE and ORDER OF ABATEMENT
Business and Professions Code, § 26031.5
California Code of Regulations, Title 4, §§ 17802-17804

Case Number: [DCC24-0000190-INV]

Date Issued	January 30, 2024
Issued To	ESTD, LLC Nguey Lay, Managing Member Michael Hall, Member
Address of Service	313 IVY ST, SAN FRANCISCO, CA 94102
Date and Method of Service	Certified Mail
License Number	C10-0001172-LIC

Business and Professions Code section 26031.5 provides the Department of Cannabis Control (Department) the statutory authority to issue a citation, including fines and orders of abatement, to a licensee or unlicensed person for any act or omission that violates or has violated any provision of the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) or any regulation adopted pursuant thereto. You are being issued this citation for the following violations of MAUCRSA (Bus. & Prof. Code (BPC), § 26000 et seq.) and the Department's regulations. (Cal. Code Regs. (CCR), tit. 4, § 15000 et seq.)

VIOLATION	VIOLATION DATE(S)	AMOUNT OF FINE PER VIOLATION	TOTAL AMOUNT OF FINE FOR VIOLATION
1. Business and Professions Code section 26039.3; California Code of Regulations, title 4, section 17801.5, subdivision (g)	November 11, 14, 18, 24 & 26, 2023.	\$10,000	\$80,000

Violation 1.

CCR, title 4, section 17801.5, subdivision (g) prohibits a licensee or product owner from removing from embargo, selling, or disposing of any cannabis or cannabis products under embargo without written permission of the Department or a court. Each item removed, sold, or disposed of without written permission of the Department or a court constitutes a separate violation of the MAUCRSA.

On November 9, 2023, the Department placed cannabis products under embargo pursuant to BPC section 26039.3. The basis for placing these items under embargo was that the Department found or had probable cause to believe the cannabis or cannabis products were adulterated or the sale of the embargoed items would violate the MAUCRSA.

The Department issued an initial notice of embargo to ESTD, LLC (Licensee) on November 9, 2023, by email indicating that "SHARK BITE – PACIFIC CHEMISTRY" Pre-Rolls from METRC Batch No. 1A406030000465D000001314 were under embargo and could not be sold, disposed of, or removed without written permission from the Department or a court.

On January 26, 2024, Department staff conducted a review of Licensee's California Cannabis Track and Trace (CCTT) account, which reflected that Licensee had sold the embargoed product on November 11, 14, 18, 24 & 26, 2023. Eight (8) total transactions were conducted. The Department did not authorize or approve Licensee to sell or dispose of the embargoed items, nor to remove the embargoed items from embargo. As a result, the Licensee failed to comply with the Department's November 9, 2023, embargo and violated the requirements of BPC section 26039.3 and CCR, title 4, section 17801.5, subdivision (g).

ADMINISTRATIVE FINE ASSESSED

Pursuant to Business and Professions Code section 26031.5, the Department may assess a fine not to exceed five thousand dollars (\$5,000) per violation by a licensee or thirty thousand dollars (\$30,000) per violation by an unlicensed person. Each day of violation shall constitute a separate violation.

Additionally, pursuant to Business and Professions Code section 26039.3, 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) per violation. Each transaction shall constitute a separate violation.

The full amount of the fine must be paid within thirty (30) days of the date of service of this citation, unless the citation is contested. To ensure the payment is credited, indicate on your payment the case number provided at the top of this citation. Payment made by check, money order or cashier's check may be made payable to "DCC" or "California Department of Cannabis Control." Payment shall be made by one of the following methods:

In person: at one of our office locations with exact cash, cashier's check, money order, or a personal or business check

- To schedule an in-person payment appointment, email us:
payments@cannabis.ca.gov
- Or call us at: 1-844-61-CA-DCC (1-844-612-2322)

By mail: cashier's check, money order, personal or business check

- U.S. Postal Service: PO Box 419106, Rancho Cordova, CA 95741
- FedEx or UPS: 2920 Kilgore Road, Rancho Cordova, CA 95670

Failure to pay the full amount of the administrative fine within thirty (30) days from the date of service of the citation, unless you appeal the citation, is a separate violation and may result in additional action by the Department. Licenses shall not be renewed or granted if fines are not paid and unpaid fines will be added to license renewal fees.

In the instant matter, an administrative fine(s) in the total amount of \$80,000 is assessed against ESTD, LLC in accordance with Business and Professions Code section 26031.5.

ORDER OF ABATEMENT

Pursuant to Business and Professions Code section 26031.5, a citation may include an order of abatement and fix a reasonable time for abatement of the violation. You are ordered to:

1. Immediately cease and desist from violating California Code of Regulations, title 4, section 17801.5, subdivision (g). The Licensee shall comply with the Department's November 9, 2023 embargo by terminating any further sale or disposal of the embargoed items without prior Department approval.

You must abate the violation(s) and provide evidence of abatement to the Department no later than February 20, 2024. Failure to abate the violation(s) within the time allowed, unless the violation is being appealed, shall constitute a separate violation and may result in denial of an application for licensure or renewal of a license, disciplinary action, or further administrative or civil proceedings. If you are unable to complete the correction within the time provided because of conditions beyond your control after the exercise of reasonable diligence, you may request an extension of time in which to correct the violation. The request shall be made in writing and submitted to the Department, at denis.rakitskiy@cannabis.ca.gov within the time set forth for abatement. The time to abate or correct may be extended for good cause.

APPEALING THE CITATION

To appeal the citation, you may request an informal conference with the Department, or request a formal hearing to contest the citation before an Administrative Law Judge, or both. Requests must be submitted in writing in accordance with the timeframes specified below or the right to a hearing is waived. If a hearing is not requested, payment of a fine will not constitute an admission of the violation charged.

INFORMAL CONFERENCE

You may request an informal conference with the Department regarding the acts or omissions found in the citation in accordance with California Code of Regulations, title 4, section 17803, subdivision (b). During an informal conference, you may present evidence supporting an adjustment to the citation and/or fine(s). The Department may affirm, modify, or dismiss the citation, including any fines assessed or orders of abatement issued. The informal conference may also resolve any matters relating to the citation through a settlement agreement.

To request an informal conference, your request must be in writing and submitted to the Department at denis.rakitskiy@cannabis.ca.gov, within 15 calendar days from service of this citation. The informal conference may be conducted by telephone, through a virtual platform, or in person, at the Department's Headquarters, located at 2920 Kilgore Road, Rancho Cordova, California 95670. The informal conference will be held within 15 calendar days from receipt of the written request by the Department.

Requesting an informal conference does not stay or toll the running of the 30-day period for you to request a formal hearing to contest the citation before an Administrative Law Judge. You should request an informal conference as soon as possible if you would like to allow time to hold the

conference prior to the deadline for contesting the citation as the time to contest a citation does not stop if you request an informal conference.

At the conclusion of the informal conference, a written decision stating the reasons for the decision will be mailed to you within 15 calendar days from the date of the informal conference, which shall be deemed a final order. If the citation is dismissed, any request for a formal hearing shall be deemed withdrawn. If the citation is affirmed or modified, you may either withdraw the request for a formal hearing or proceed with the hearing. If the citation is modified, the original citation shall be considered withdrawn and a new citation issued. A request for a formal hearing on the new citation must be submitted to the Department in writing within 30 calendar days of issuance of the new citation.

CONTESTING THE CITATION

You have a right to contest the finding of a violation before an Administrative Law Judge by requesting a formal hearing. To request a formal hearing, your request must be in writing and submitted to the Department within 30 calendar days from service of the citation. If a request is not received by the Department within 30 calendar days, the right to a hearing is waived, and the citation becomes a final order of the Department and is not subject to review by any court. The hearing shall be held pursuant to the Administrative Procedure Act (Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code). Written requests for a hearing to contest the finding of a violation must be emailed to appeals@cannabis.ca.gov or submitted in hard copy by mail or delivery to:

U.S. Postal Service	FedEx or UPS
Department of Cannabis Control Legal Affairs Division PO Box 419106 Rancho Cordova, CA 95741	Department of Cannabis Control Legal Affairs Division 2920 Kilgore Road Rancho Cordova, CA 95670

The Department may seek recovery of the reasonable costs of investigation and enforcement pursuant to Business and Professions Code section 26031.1 at the formal hearing on the citation or as part of any stipulated settlement.

Issued To: ESTD, LLC
License/Case No: C10-0001172-LIC / DCC24-0000190-INV
Issued By: Jose Mendez
Date: January 30, 2024
Page 6 of 6

If you have any questions regarding this citation or the appeals process, please contact Denis Rakitskiy at denis.rakitskiy@cannabis.ca.gov.

Date: January 30, 2024

By: Mendez,
Jose@Cannabis
Jose Mendez
Branch Chief
Compliance

Digitally signed by Mendez,
Jose@Cannabis
Date: 2024.01.30 11:36:54 -08'00'



Proof of Service

(Citation Assessing Fines and Order to Abate and Pay Costs, Bus. & Prof. Code (BPC) § 26000 et seq.)

I, the undersigned, declare that at the time of service I was at least 18 years of age and not a party to this action or matter. I am employed by the California Department of Cannabis Control, with headquarters located at 2920 Kilgore Road, Rancho Cordova, California 95670.

On the date listed below, I served the following document(s):

Citation Assessing Fines and Order to Abate and Pay Costs dated 1/30/24 to the person(s) listed below as follows:

Nguey Lay, Michael Hall on behalf of ESTD LLC (DCC24-0000190-LIC) at 313 IVY ST SAN FRANCISCO, CA 94102

The documents were served by the following means:

☒ BY UNITED STATES MAIL: I enclosed the documents in a sealed envelope or package, addressed to the person(s) as listed above and (*specify one*).

☐ DIRECT DEPOSIT: I deposited it with the United States Postal Service, with postage fully prepaid.

☒ CERTIFIED MAIL: I placed it for collection and mailing, return receipt requested, Certified Receipt Number: 7020-2450-0000-6585-1041 following the Department of Cannabis Controls' ordinary business practices.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at 2920 Kilgore Road, Rancho Cordova, California 95670.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 1/30/24 in Rancho Cordova, California.

Adger,
Joshua@Cannabis

Digitally signed by Adger,
Joshua@Cannabis
Date: 2024.01.30 13:17:50 -08'00'

Office Technician
Compliance Division



USPS TRACKING#



SAN FRANCISCO CA 940

2 FEB 2024 PM 3 L

9590 9402 7578 2098 0130 02

United States
Postal Service

* Sender: Please print your name, address, and ZIP+4® in this box*

Department of Cannabis Control
Attn: Compliance Division
2920 Kilgore Rd
Rancho Cordova, CA 95670First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Nguey Lay/michael Hall
313 Ivy St., San Francisco, CA 94102

9590 9402 7578 2098 0130 02

2. Article Number (Manufacturer's Number)
7020 2450 0000 6585 1041

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

2-2

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Delivery Restricted Delivery
- ☐ Signature Confirmation Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

(over \$500)
all Restricted Delivery

Domestic Return Receipt

PS Form 3811, July 2020 PSN 7530-02-000-9053

PROOF OF SERVICE

Case Name: In the Matter of Citation Against: ESTD LLC, dba FIG & THISTLE APOTHECARY
DCC Case No. DCC24-0000190-INV
License Number: C10-0001172-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 May 23, 2025, I served the within documents:

ORDER ADOPTING STIPULATED SETTLEMENT AND ORDER AS FINAL DECISION

- ☒ VIA ELECTRONIC TRANSMISSION. Pursuant to CCP § 1010.6, on this date, 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 Respondent listed below.
- ☒ Service via certified mail to be completed upon the following business day.

Jaimie Mak, Esq.
4 Embarcadero Ctr., Suite 1400
San Francisco, CA 94111-4164
jmak@meridianfirm.com

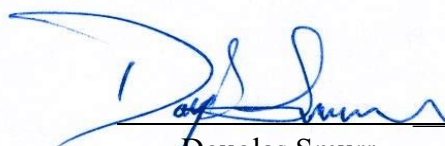
Nguey Gong Lay
Managing Member, ESTD LLC
429 Gough Street
San Francisco, CA 94102
ngueylay@msn.com

Harinder Kapur (email only)
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 May 23, 2025, at Rancho Cordova, California.



Douglas Smurr