



Department of
Cannabis Control
CALIFORNIA

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

July 8, 2025

VIA EMAIL AND CERTIFIED MAIL

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Orang Haghighi, Owner
Santa Ana Main Distro, LLC
1836 South Grand Ave.
Santa Ana, CA 92705
Admin@o-Mina-Distro.Com

Re: SANTA ANA MAIN DISTRO, LLC dba O'MINA DISTRIBUTION, INC.
ORANG HAGHIGHI, OWNER
OAH No. 2025060102
Agency Case No. DCC23-0002236-INV
Order Adopting Proposed Decision as Final Decision

Dear Messrs. Lawrence, Zuber, Haghighi, and Ms. Pareja:

Attached please find a copy of the Department of Cannabis Control's Order Adopting the Proposed Decision of Administrative Law Judge Deena R. Ghaly as the Final Decision in the above-referenced matter.

Pursuant to the Final Decision:

- (1) Cannabis – Distributor License Number C11-0001780-LLC issued to Respondent Santa Ana Main Distro, LLC, Orang Haghighi as Owner, is revoked;
- (2) Respondent's counsel shall promptly coordinate with Department of Cannabis Control's Attorney, Jason Hurtado (Jason.Hurtado@cannabis.ca.gov), for the proper destruction of any cannabis and cannabis goods in Respondent's possession; and

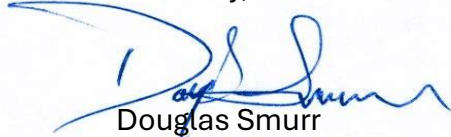
- (3) Respondent Santa Ana Main Distro, LLC, Orang Haghighi as Owner shall pay \$15,865.33 in costs, in the form of a cashier's check, money order, personal or business check, made out to the Department of Cannabis Control and remitted within 30 days by either of the following methods: (a) the Department of Cannabis Control's cash payment procedures; or (b) mailed to:

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

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

The Department's Order and Final Decision is effective today, July 8, 2025.

Sincerely,



Douglas Smurr
Assistant General Counsel

info@cannabis.ca.gov

www.cannabis.ca.gov

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

In the Matter of the Accusation Against:

**SANTA ANA MAIN DISTRO, LLC DBA O'MINA DISTRIBUTION,
INC.; ORANG HAGHIGHI, OWNER,**

Respondent.

Agency Case No. DCC23-0002236-INV

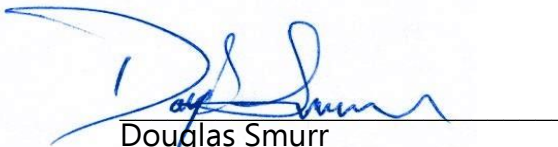
OAH No. 2025060102

FINAL DECISION

Pursuant to Government Code section 11517, subdivision (c)(A), the attached Proposed Decision of Administrative Law Judge Deena R. Ghaly is hereby adopted in its entirety by the Department of Cannabis Control as its Final Decision in the above-entitled matter.

This Decision shall become effective on July 8, 2025.

IT IS SO ORDERED this 8th day of July 2025.


Douglas Smurr
Assistant General Counsel
FOR THE DEPARTMENT OF
CANNABIS CONTROL

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

In the Matter of the Accusation Against:

**ANTA ANA MAIN DISTRO, LLC DBA O'MINA DISTRIBUTION,
INC.; ORANG HAGHIGHI, OWNER,**

Respondent.

Agency Case No. DCC23-0002236-INV

OAH No. 2025060102

PROPOSED DECISION

Administrative Law Judge Deena R. Ghaly, Office of Administrative Hearings (OAH), State of California, heard this matter on June 18 and 19, 2025, by videoconference.

Deputy Attorney General Matthew S. Beasley represented complainant Evelyn Schaeffer, acting in her official capacity as Deputy Director of the Compliance Division of the Department of Cannabis Control (Department). J. Raza Lawrence, Esq., Zuber Lawler LLP, represented Santa Ana Main Distro, LLC, doing business as O'Mina Distribution, Inc.

Documentary evidence and testimony were received. The record closed and the matter was submitted for decision on the second hearing day.

SUMMARY

Complainant seeks to discipline respondent's license based on allegations respondent committed several violations of the Department's regulations. Complainant also seeks to recoup its investigation and prosecution costs. A preponderance of the evidence established the violations alleged. Due to the severity of the violations and statements respondent's owner, Haghighi, made in his defense that are not credible, license revocation is the appropriate disciplinary response. Respondent will also pay cost awards consistent with complainant's request.

FACTUAL FINDINGS

Jurisdiction

1. On January 3, 2023, the Department issued Cannabis – Distributor License C11-0011780-LIC to Santa Ana Main Distro LLC (respondent) with Oran Haghighi as Owner (Haghighi). Respondent's license was in full force and effect at all times relevant to this matter and will expire on January 3, 2026.

2. On May 11, 2025, complainant issued an accusation against respondent alleging four violations of Department regulations: (i) conducting cannabis activity with unlicensed entities; (ii) failing to accurately record commercial cannabis activity; (iii) sharing credentials for accessing the Department's cannabis activity tracking

software; and (iv) recording inaccurate and erroneous information in shipping manifests. Respondent timely filed a Notice of Defense and this matter ensued.

Statutory/Regulatory Scheme

3. Commercial sales of cannabis in California are governed by the Medicinal and Adult Use Cannabis Regulation and Safety Act. (Bus. & Prof. Code, § 26000 et seq.) (the Act.) (Further statutory citations are to the Business and Professions Code unless otherwise designated.) The business is also governed by the Act's implementing regulations (Cal. Code. Regs., tit. 3 (Regulation or Reg.), §8000 et seq.) The Act charges the Department with licensing and regulating commercial cannabis (§ 26010.5, subd. (d)) as well as issuing licenses and disciplining licensees (§ 26012, subd. (a)), among other duties.

4. The Act requires the Department to establish a system to track and trace cannabis from cultivation through the supply chain "from seed to sale." To satisfy this obligation, the Department established the California Cannabis Track-and-Trace System (CCTT) using Metrc software (Metrc). Under the CCTT, licensees and their designees are required to log in to Metrc with a unique identifier and to timely and accurately report required data.

The Department's Investigation

5. On January 14, 2025, Department special investigators Emily Gutierrez (Gutierrez) and Daniel Torres (Torres) inspected respondent's premises. Gutierrez, the lead on the matter, prepared a report and both investigators testified at the hearing. Their findings are as follows:

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- Haghighi spoke to the investigators during the inspection and stated respondent works with both licensed and unlicensed entities. According to Gutierrez, Haghighi stated he charged a flat fee of \$1,000 per month to store, move, or distribute cannabis and does not question the license status of his customers.
- Gutierrez observed boxes labelled Life Cannabis, which, according to Gutierrez, Haghighi explained respondent was storing for the Life Cannabis company. Life Cannabis is not a Department licensee.
- The investigators' inspection included reviewing CCTT data, which reflected data entries made under the initials S.S., the initials of respondent's previous owner, Samantha Solmor. Ms. Solmor continued working with respondent for a few months after Haghighi bought the company but, effective October 1, 2023, relinquished her credentials. The user, S.S., however, continued to be listed in respondent's CCTT data throughout 2024, long after she was no longer affiliated with respondent. Haghighi told Gutierrez all CCTT entries had been input by a respondent employee identified only as Tatiana. Gutierrez did not find a Tatiana listed among the users in respondent's CCTT account.
- In subsequent communications to Haghighi, Gutierrez requested Tatiana's last name but Haghighi did not provide it.
- Respondent's shipping manifests showed multiple consecutive day deliveries made to the same defunct licensee, El Dorado Extracts (El Dorado), at 1080 23rd Avenue, Oakland, California. Gutierrez stated such manifests "raise red flags." Drivers transporting cannabis products must carry paper versions of

the manifests, which are essentially records of cannabis movement, on their person when making deliveries. In the event they are delivering cannabis products to unlicensed entities, carrying fraudulent ones would be essential in case they are stopped enroute.

- The inspectors' review found manifests for three consecutive day deliveries between October 22 through 24, 2024; five consecutive day deliveries from November 5 through 9, 2024; three consecutive days from November 12 through 14, 2024; five consecutive days deliveries from December 3 through 7, 2024; and four consecutive days deliveries from December 10 through 13, 2024. Haghighi told the investigators that Tatiana had prepared all the manifests and that they were not always followed by his driver. Haghighi stated personnel from El Dorado, a regular client, would call to place its order over the phone and therefore there were no written orders.
- The manifests Guttierrez saw at respondent's facility were electronic, not the paper versions the driver would carry and upon which a wet signature could be expected to be found. During the inspection of respondent's facility, Guttierrez asked Haghighi to see the paper versions. Haghighi pulled out individuated folders bearing various entities names but could not locate the one for El Dorado, noting Tatiana was responsible for filing and must have misplaced it.

6. Denis Rakitskiy is a Department special investigator. Rakitskiy investigated El Dorado and testified at the hearing about his findings. The objective of Rakitskiy's investigation was to determine whether large transfers of cannabis purportedly going to El Dorada were in fact arriving there.

7. During his investigation, Rakitskiy attempted to contact individuals associated with El Dorado, including an owner of record, Tarik Page, but Page did not return Rakitskiy's messages. Rakitskiy also visited El Dorado's premises twice in the summer of 2024 and tried, without success, to gain access. Rakitskiy believes the premises was vacated at the time of his visits. The building's property manager confirmed in an email communication to Rakitskiy that El Dorado had not renewed its lease for 1080 23rd Avenue, which ended on July 31, 2024. (Exh. 25.) On September 26, 2024, the property manager let Rakitskiy into El Dorado's suite where Rakitskiy found the place entirely empty. He took photographs showing the empty space. (Exh. 26.)

Respondent's Evidence

8. In written declarations and in his testimony at the hearing, Haghighi provided explanations for the investigators' findings. Regarding his statement about doing business with unlicensed entities, Haghighi stated the quote was taken out of context, that he was referencing agreements he had with branding companies, including Life Cannabis, who wished to come to agreements with retailers to sell cannabis products under the branding companies' names. According to Haghighi, branding companies do not need licenses to add their particular part in the cannabis supply chain. Haghighi did not produce any contracts or other written documents reflecting agreements or scope of work between respondent and branding companies, stating all work orders and agreements were memorialized through discussions over the phone.

9. Haghighi maintained the use of S.S.'s credentials was a simple clerical error. The email address associated with S.S.'s log in information was respondent's general email and Haghighi was hesitant to cease using it as that might mean losing

important correspondence. He also reiterated any mistakes made were the fault of Tatiana, including sharing credentials for accessing the CCTT system. Haghighi maintained he discharged Tatiana from her position once he came to understand the many mistakes she had made. Sylvia Cano Rosales (Cano), respondent's new manager, testified at the hearing and stated she now uses proper credentialing for all of respondent's CCTT's entries into Metrc. Cano also stated all respondent employees now have their own credentials for inputting information into Metrc.

10. Haghighi stated Tatiana also was responsible for creating the manifests and did not always void out ones that were not used, another instance of her incompetence. He stated the driver did not always follow the manifests but had made multiple deliveries to El Dorado, always dropping off cannabis products per its orders.

11. Respondent's driver, Jonathan Gallo, testified he made many deliveries to the El Dorado facility during the October through December, 2024 period, among other times. According to Gallo, until the last delivery sometime in December 2024, there was always someone to take delivery though he stated the hand-off always took place outside El Dorado's facility and he never entered the premises. Gallo further testified that, due to the sensitive nature of his cargo, he drives directly to Oakland and, because he returns with cash payments, directly back to respondent's facility, stopping only for gas and rest breaks.

12. Haghighi produced one paper manifest counterpart to the electronic manifests Gutierrez reviewed reflecting multiple deliveries to El Dorado between October and December 2024. The paper manifest is dated October 17, 2024 with October 18, 2024 as "date of departure/arrival." The signature of the receiver, Tarif Page, is dated October 19, 2024. (Exh. C, p. B195.)

13. To the extent, respondent violated Department regulations, Haghighi argued that there are several factors militating away from revoking respondent's license or otherwise harshly disciplining it. Haghighi noted respondent had no disciplinary history before the current case, and that, except for failing to provide Tatiana's full name to Gutierrez, he cooperated fully with the Department's investigation on respondent's behalf. Haghighi also pointed out he replaced Tatiana with more competent and scrupulous staff, and he has hired a compliance officer, Jenna Rompel (Rompel), to assist him in complying with all relevant laws and regulations. Haghighi offered respondent's contract with Rompel to corroborate his testimony about hiring a compliance officer. (Exh. L.) Haghighi also argued there was no evidence indicating respondent's transgressions had resulted in any health or safety concerns.

Analysis

14. Aside from Haghighi's alleged admission, which Haghighi has disavowed, complainant's evidence establishing respondent did business with unlicensed entities is circumstantial: the manifests indicating deliveries to a defunct licensee who had vacated his facility at the address to which respondent was ostensibly delivering cannabis products; the fact that the manifests reflected an unusual number of deliveries to El Dorado within compressed time periods and Haghighi's admission that the manifests did not reflect the actual dates of deliveries further support a finding that whatever deliveries were made were not made when or to where the manifests reflect. The only reasonable inference from this evidence is that respondent was trying to conceal the actual recipient of its deliveries and the only reasonable inference for why that would be the case is because the recipient is unlicensed.

15. In addition to complainant's evidence, respondent's own evidence is not credible and only further supports a finding that respondent did do business with unlicensed entities. Haghighi's testimony about his comments to Gutierrez being taken out of context and that his only reference to unlicensed businesses was about branding companies is not credible. For one, why reference businesses ancillary to cannabis production and sale as "unlicensed"? If such businesses do not fall within the ambit of the Department's regulatory control, they have no status vis-à-vis the Department. Denoting them as unlicensed can only be understood as Haghighi's attempt to backpedal from his more candid statements to Gutierrez in an unguarded moment. Additionally, Haghighi's testimony about the manifests exhibiting only minor clerical errors is belied by the strong evidence that El Dorado was defunct at times the manifests reflect deliveries to its facilities. Gallo's testimony that he made his deliveries and returned without lengthy stops coupled with the only manifesto bearing a wet signature showing receipt of respondent's product one day after the date of delivery also support a finding that the hard copy manifest is falsified.

16. Circumstantial evidence may carry the burden of establishing a claim and may be as persuasive and convincing as direct evidence. (*People v. Overstock, Inc.* (2017) 12 Cal.App.5th 1064, 1086). There are limitations, however. Circumstantial evidence's inferences must be the logical extension of the evidence. "Speculation and conjecture alone is not substantial evidence." (*Feduniak v. California Coastal Commission* (2007) 148 Cal.App.4th 1346, 1360.) Here, the logical and direct inference to be drawn from complainant's evidence as well as Haghighi's uncredited statements is that respondent did cannabis-related business with unlicensed entities.

17. Respondent's evidence of mitigation and rehabilitation is not strong. While this is respondent's first disciplinary action since licensure under its current

ownership, respondent had only been licensed since January 2023 when Department investigators detected unlawful activity, including misuse and sharing of credentials for inputting information into the CCTT, transactions which are not in dispute. This is a relatively short time and insufficient to establish a reputation as a trustworthy business. Regarding respondent's representation that it was cooperative with the Department's investigation, Haghighi's failure to produce or even fully identify the employee, Tatiana, belies a finding that respondent was truly cooperative. Haghighi initially laid the blame for any wrongdoing on Tatiana. Failing to fully identify her during the Department's investigation raises the possibility that he was using her as a smokescreen rather than providing the transparency a legitimate business dealing with its regulatory agency is expected to show.

18. Finally, respondent's argument that the alleged transgressions do not pose health and safety risks is without merit. Respondent's unreliable and possibly fabricated manifests pose serious health and safety risks as they represent multiple deliveries of cannabis product the Department cannot track. It is this tracking capacity that allows the Department to ensure cannabis products are not delivered to the wrong hands and can be recalled if any reason to do so arises.

Costs

19. The Department seeks an award of \$6,372.58 for investigative costs and \$9,492.75 for enforcement costs, a total of \$15,865.33. These costs are deemed reasonable given the size and scope of the matter.

20. Respondent did not present any evidence regarding its financial status or ability to pay these costs.

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LEGAL CONCLUSIONS

1. Section 26011.5 states: "The protection of the public shall be the highest priority for all licensing authorities in exercising licensing, regulatory, and disciplinary functions under this division. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

2. Pursuant to section 26031, subdivision (a), the Department may revoke or discipline licenses it issued "if the licensee is found to have committed any of the acts or omissions constituting grounds for disciplinary action." Under section 26031, subdivision (c), the Department may take disciplinary action against a licensee for any violation of the Act "when the violation was committed by the licensee's officers, directors, owners, agents or employees while acting on behalf of the license or engaged in commercial cannabis activity."

3. The burden of proof in a licensing disciplinary action is on the party filing the charges in the accusation, in this case, complainant. (Evid. Code, § 500.) Because no other standard of proof is identified in the statutory scheme and the disciplinary action does not involve the discipline of a professional license, the standard of proof is preponderance of the evidence. (Evid. Code, § 115; *Imports Performance v. Department of Consumer Affairs, Bureau of Automotive Repair* (2011) 201 Cal.App.4th 911, 916-918.) The preponderance standard requires "evidence that has more convincing force than that opposed to it." (*People ex. rel. Brown v. Tri-Union Seafoods, LLC* (2009) 171 Cal.App.4th 1549, 1567.)

4. Pursuant to section 26030, grounds for discipline include violations of the Act and its regulations.

5. Pursuant to regulation section 15024.1, subdivision (a), the cannabis or cannabis product owned by a licensee whose license has been terminated may be destroyed.

Causes for Discipline

FIRST CAUSE FOR DISCIPLINE – CONDUCTING CANNABIS ACTIVITIES WITH UNLICENSED ENTITIES

6. Under Regulation section 15000.1, “commercial cannabis activity shall only be conducted between licensees.”

7. As a first cause of discipline, the Department alleged respondent, through the actions of Haghighi, violated Regulation section 15000.1. Specifically, complainant alleged respondent falsified manifestos to reflect he was making deliveries to another Department licensee when, in fact, that licensee, El Dorado, had vacated its premises for at least several months during the period respondent was ostensibly making deliveries to it.

8. As set out in Factual Finding 14 through 16, complainant established respondent did business with unlicensed entities.

SECOND CAUSE FOR DISCIPLINE – FAILURE TO ACCURATELY RECORD CANNABIS ACTIVITY

9. Under Regulation section 15047.2, subdivision (b), “All commercial cannabis activity shall be accurately recorded in the [CCTT].” Under Regulation section 15047.2, subdivision (c), “A licensee is responsible for the accuracy and completeness of all data and information entered into the [CCTT]. The licensee is responsible for all

actions taken by the designated account manager or other account users while performing track and trace activities.

10. As a second cause for discipline, the Department alleged respondent violated Regulation section 15047.2, subdivision (c) by failing to accurately record cannabis activity in the CCTT when it used a former employee's credentials to log in to the tracking system. As set out in Factual Finding 9, Haghighi admitted to this transaction and therefore this cause for discipline was established.

THIRD CAUSE FOR DISCIPLINE – IMPROPER USE AND SHARING OF CCTT CREDENTIALS

11. Under Regulation section 15048, subdivision (c):

The account manager and each user shall utilize a unique login, consisting of a username and password. The account manager and each user shall only access the [CCTT] under their assigned login. No account manager or user shall share their login, username, or password, with an other individual for any reason.

12. Under Regulation section 15048.1:

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

Designate track and trace system users, as needed, and require the system users to be trained in the proper and lawful use of the [CCTT] before the users are permitted to access the [CCTT].

Maintain an accurate and complete list of all of the licensee's [CCTT] system users, including full names and usernames, and update the list immediately when changes occur.

Remove a user from the licensee's [CCTT] account when that individual is no longer authorized to represent the licensee.

13. As a third cause for discipline, the Department alleged violations of Regulations sections 15048, subdivision (c) and 15048.1, subdivision (a)(1) through (3) by allowing a single user, an employee identified only as Tatiana, to input information into the CCTT under the name of respondent's former owner and after that individual was no longer affiliated with respondent.

14. As set out in Factual Finding 9, Haghighi admitted to this transgressions therefore the third cause for discipline was established.

FOURTH CAUSE FOR DISCIPLINE – INACCURATE DISTRIBUTION MANIFEST

15. Regulation section 15049.2 provides in part:

[¶] . . . [¶]

(b) The distributor who transports the cannabis or cannabis product shall record the following additional information on the shipping manifest:

- (1) The actual date and time of departure from the licensed premises; and
- (2) The actual date and time of arrival of each licensed premises.

16. As a fourth cause for discipline, the Department alleged respondent violated regulation section 15049.2 by distributing cannabis on dates and times which did not match those on the associated delivery manifests. As set out in Factual Findings 14 through 16, the evidence established the manifests investigators found reflecting deliveries to El Dorado during the October through December, 2024 period could not have been correct because at that time, El Dorado's business was defunct and it had vacated the premises to which respondent's driver purportedly delivered cannabis product.

Disciplinary Guidelines

17. The Department promulgated the Disciplinary Guidelines for all Commercial Cannabis Licenses (Guidelines), amended July 2022, to promote consistency in disciplinary orders for similar offenses. (See Exh. 6.) Deviation from the Guidelines is appropriate where the facts of the particular case warrant deviation such as where there are mitigating facts. (Reg., § 17814.)

18. The Guidelines categorize violations as Tier 1, 2, or 3, Tier 3 being the most serious. Conducting cannabis activity with non-licensees in violation of Regulation § 15000.1 is a Tier 3 violation. Failure to record all cannabis activity in the CCTT in violation of Regulation § 15047.2, improper use and sharing of CCTT credentials in violation of Regulation sections 15048, subd. (c) and 15048.1, subd. (a) (1)-(3) and distributing cannabis on dates and times different from their associated manifests in violation of Regulation section 15049.2 are Tier 2 violations.

19. The recommended minimum penalty for a Tier 3 violation is stayed revocation with a 45-day suspension, a fine or a combination of suspension and a fine. The maximum recommended penalty is license revocation. The recommended

minimum penalty for a Tier 2 violation is stayed revocation with a 15 to 30-day suspension, a fine or a combination of suspension and a fine. As with Tier 3 violations, the maximum recommended penalty is license revocation.

20. The Guidelines also list the factors to be considered in determining the degree of license discipline. The relevant factors and their application to this case are as follows:

Nature and gravity of the act(s), violations, offenses, or crime(s) under consideration. Respondent's acts, involving essentially circumventing the regulatory requirements for tracking cannabis transport and ensuring cannabis transactions occur only with other licensees, are very serious.

Actual or potential harm to the public or consumers. Because respondent sent out cannabis product into the cannabis supply chain without essential safeguards to track and maintain control over the product, whether there is danger to the public or consumers cannot be determined; however, its actions create potential harm for both.

Prior disciplinary and/or administrative record. Respondent has no history of prior discipline though its relatively short tenure under its current owner gives this factor little weight.

Number and/or variety of current violations. As alleged, respondent's transgressions encompassed violations of multiple regulations.

Evidence of Mitigation and Rehabilitation. Respondent presented evidence of mitigation and rehabilitation, particularly with respect to improving compliance by hiring competent staff and arranging for the services of a compliance officer. However, in light of Haghighi's improbable statements and lack of accountability, these improvements to business systems ring hollow and provide little guarantees that, should respondent be allowed to remain in business, it would adhere to the legal requirements.

(Exhibit 6, pp. A55-A56.)

21. Considering the Guidelines' recommended penalties and the factors for disposition, nothing in the record supports a basis for leniency. Under these circumstances, license revocation is warranted and necessary for the public safety.

Costs

22. Pursuant to section 26031.1, subdivision (a), the ALJ may require a licensee found to have committed a violation to pay the reasonable costs of the case's investigation and prosecution. Pursuant to section 26031.1, subdivision (b), certified cost records "shall be prima facie evidence of reasonable costs of investigation and prosecution of the case."

23. In *Zuckerman v. State Board of Chiropractic Examiners* (2002) 29 Cal.4th 32 (Zuckerman), the California Supreme Court examined a similar statute authorizing cost awards in license disciplinary matters. The Court set out factors to be considered in determining the reasonableness of the costs sought" (i) the licensee's success in

getting the charges dismissed or reducing the severity of the discipline; (ii) the licensee's good faith belief in the merit of its position; (iii) whether the licensee raised a colorable challenge to the proposed discipline; (iv) the licensee's ability to pay; and (v) whether the scope of the investigation was appropriate in light of the alleged misconduct. (*Zuckerman, supra*, 29 Cal.4th at p. 45.)

24. As set out in Factual Finding 19, Complainant requests reimbursement of \$15,865.33 in investigation and enforcement costs. Applying the *Zuckerman* criteria, there is no basis to reduce these cost and thus the full amount is awarded.

ORDER

1. Cannabis – Distributor License Number C11-0001780-LLC issued to respondent Santa Ana Main Distro, LLC, Orang, Haghighi as Owner, is revoked.

2. Respondent is ordered to pay \$15,865.33 in costs under terms and conditions to be determined by the Department.

3. Respondent is ordered to destroy any cannabis and cannabis goods in respondent's possession.

DATE: 07/02/2025

Deena R. Ghaly
Deena R. Ghaly (Jul 2, 2025 11:35 PDT)
DEENA R. GHALY

Administrative Law Judge
Office of Administrative Hearings

PROOF OF SERVICE

Case Name: SANTA ANA MAIN DISTRO, LLC dba O'MINA DISTRIBUTION, INC
OAH Case No. 2025060102; DCC Case No. DCC23-0002236-INV

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 July 8, 2025, I served the within documents:

FINAL DECISION

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

J. Raza Lawrence, Esq.
Carla Pareja Paris, Esq.
Thomas F. Zuber, Esq.
ZUBER LAWLER LLP
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Orang Haghighi, Owner
Santa Ana Main Distro, LLC
1836 South Grand Ave.
Santa Ana, CA 92705
Admin@o-Mina-Distro.Com

Harinder Kapur (email only)
Assistant Attorney General
Cannabis Control Section
Office of Attorney General
Harinder.Kapur@doj.ca.gov

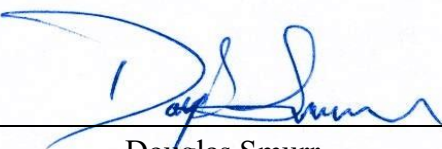
Deena R. Ghaly
Administrative Law Judge
Office of Admin Hearings
320 W. 4th Street, Suite 630
Los Angeles, CA 90013-2350

(First class mail only)

I am familiar with the Department's business practices for collecting and transmitting mail through the United States Postal Service. In accordance with those practices, correspondence placed in the Department's internal mail collection system is, in the ordinary course of business, deposited in the United States Postal Service, with postage paid, on the same day

I declare under penalty of perjury under the laws of the State of California, and the United States of America, that the above is true and correct.

Executed on July 8, 2025, at Rancho Cordova, California.



Douglas Smurr