

**STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION
JOHN O. PASTORE CENTER, BLDG. 68-1
1511 PONTIAC AVENUE
CRANSTON, RHODE ISLAND 02920**

IN THE MATTER OF :
 :
ORGANIC BEES, LLC, : **DBR No. 21OCR007**
 :
RESPONDENT. :
 :

CONSENT AGREEMENT

The Department of Business Regulation, Office of Cannabis Regulation (“Department”) and Organic Bees, LLC (“Respondent”) (collectively “the Parties”) hereby consent and agree that:

1. The Respondent is licensed as Medical Marijuana Cultivator (Class B) No. CV0058 (“License”), which was preliminarily approved September 15, 2017 and issued May 21, 2018, for the cultivation facility located at [REDACTED], Pawtucket, RI (“Facility”).
2. Respondent’s Application, dated April 19, 2017, was signed by David Ferrante and included an executed “Form 2” of the same date (the “2017 Form 2”). Form 2 is a disclosure form that the Department requires each applicant to submit to disclose all of applicant’s/licensee’s owners, key persons, controlling parties and other interest holders as required under the Regulations.¹ The 2017 Form 2 disclosed the following interest holders and information as it relates to each interest holder listed, his title, and his “Effective Own. % in Applicant”:

David Ferrante	COO/Cultivation	49.5%
Clifford Bedar	Director	25.25%
Vinicius Cordos	Director	25.25%
Evan U. Ritter	Lead Grower	0%

¹ The 2017 Form 2, “*Disclosure of Owners, Investors, Managers and Controlling Parties,*” *Part I: Ownership Structure*”, Instructions for this *Part I* were as follows: “List all persons and/or entities with any ownership interest, and all officers and directors or members/managers, whether they have ownership interest or not and anyone with managing or operational control of the cultivator license or licensed facility (collectively, “Key Persons”). If an entity (corporation, partnership, LLC, etc.) has interest, list all persons associated with such entity, their ownership in the entity, and their effective ownership in the license. List all parent holding or other intermediary business interest. Attach a separate sheet if necessary.”

3. Respondent's 2017 Form 2, Part I and Part II² disclosed no other persons or entities as owners, key persons, controlling parties or interest holders.
4. Respondent's Application also included the *Operating Agreement of Organic Bees, LLC*, provided to the Department on September 13, 2017, executed by and between "The Company - Organic Bees, LLC – David Ferrante, Manager," and "The Member – David Ferrante, Member." Respondent's *Articles of Organization* filed April 10, 2017 with the Rhode Island Secretary of State's Office state that Respondent's owner David Ferrante ("Ferrante") is the entity Manager.
5. Except as set forth in the 2017 Form 2, Respondent disclosed no other owners, key persons, controlling parties or interest holders in its Application including the 2017 Form 2.
6. On or about June 11, 2018, one of Respondent's disclosed owners David Ferrante ("Ferrante") was arrested by the Pawtucket police for possession of approximately forty-nine (49) plants and over two (2) pounds of usable marijuana at his home; Ferrante was ultimately charged with Manufacturing/Delivery/Possession of Marijuana 1-5kg, to which he pled nolo contendere and received a Deferred Sentence on January 5, 2021.
7. On June 21, 2018, Respondent sent the Department a letter ("Letter"), informing the Department of Mr. Ferrante's anticipated divestiture from the Respondent entity, signed by Respondent's two other disclosed owners Vinicius Cordos ("Cordos") and Clifford Bedar ("Bedar").
8. On January 24, 2019, Respondent's Counsel Lisa S. Holley ("Respondent's Counsel") sent various documents to DBR, including three (3) *Assignment Agreements*, each dated January 1, 2018³, purporting to transfer from Ferrante, Cordos and Bedar, 4,900, 773, and 773 shares of the Respondent entity respectively, to Michael Lemoi ("Lemoi"); the e-mail stated "This is the final official step in divesting David Ferrante from the company. They have added Micheal Lemoi to the corporate structure, to replace Ferrante. Lemoi currently has a registration card for Organic Bees, but will need to change to a 'Key Person' as of this time. I will be submitting a New Form 2 and an official letter today." [sic]
9. On or about January 30, 2019, the Respondent submitted to the Department an updated Form 2 ("2019 Form 2.0"), signed and dated that same day by Richard G. Tiberi

² Instructions for this Part II were as follows: "Who, besides the owners and other Key Persons listed in this application (including persons, firms, partnerships, corporations, limited liability companies, trusts), will loan or give money, inventory furniture or equipment to or for use in this business, or hold a security interest therein; or who will receive money or profits from this business. Attach a separate sheet if necessary."

³ This date appears to be a scrivener's error; it should have been January 1, **2019**; Ferrante was arrested in June of 2018 and his arrest was the reason for the divestiture.

(“Tiberi”). The 2019 Form 2.0 identified the following individual interest holders and their ownership interests in Part I⁴, Section A⁵:

Clifford Bedar	25%
Vinicius Cordos	25%
Michael Lemoi	50%

The following other individual interest holder(s), their title(s), and their role(s) in the Respondent entity were disclosed in Part I, Section C⁶ of the 2019 Form 2.0:

Richard G. Tiberi General Manager

Respondent’s 2019 Form 2.0 disclosed no other persons or entities as owners, key persons, controlling parties or other interest holders.

10. On May 21, 2019, Respondent submitted to the Department Respondent’s *Renewal Application for Medical Marijuana Cultivator License* (“2019 Renewal”), which included an updated Form 2 (“2019 Form 2.1”) signed by Vinicius Cordos and dated May 15, 2019. The 2019 Form 2.1 identified the following individual interest holders and their ownership interests in Part I⁷, Section A:

Clifford Bedar	25%
Vinicius Cordos	25%
Michael Lemoi	50%

The following other individual interest holder(s), their title(s), and their role(s) in the Respondent entity were disclosed in Part I, Section C:

⁴ The instructions for this Part I: Owners and Key Persons were as follows: “List **(A.)** all persons and/or entities with any ownership interest, and **(B.)** all officers and directors or members/managers, **(C.)** all persons with managing or operational control with respect to the cultivator license, operations or licensed facility whether they have ownership interest or not, and **(D.) all other persons with any financial interest whether they have ownership interest or not** (collectively, “Key Persons”). If an entity (corporation, partnership LLC, etc.) has interest, list all persons associated with such entity, their ownership or other interest in the entity, and their effective ownership in the license. List all parent, holding or other intermediary business interest. Attach a separate sheet if necessary.”

⁵ The instructions for Section A were as follows: “A. List all persons with any ownership interest in the applicant (including corporation stockholders, LLC members; and partners if a partnership); If any such person is another entity, list all persons with any ownership in or control of that entity.” [Changes from the previous version in bold type.]

⁶ The instructions for Section C were as follows: “List all persons (other than persons already listed in Section A or B above) who have managing or operational control with respect to the applicant, any other entities described in Section A, the cultivator license, operations and/or licensed facility (whether they have an ownership interest or not); if any such person is another entity, list all persons with any ownership in or control of that entity.”

⁷ The instructions for this Part I: Owners and Key Persons were as follows: “List **(A.)** all persons and/or entities with any ownership interest, and **(B.)** all officers and directors or members/managers, **(C.)** all persons with managing or operational control with respect to the cultivator license, operations or licensed facility whether they have ownership interest or not, and **(D.) all other persons with any financial interest whether they have ownership interest or not** (collectively, “Key Persons”). If an entity (corporation, partnership LLC, etc.) has interest, list all persons associated with such entity, their ownership or other interest in the entity, and their effective ownership in the license. List all parent, holding or other intermediary business interest. Attach a separate sheet if necessary.”

Richard Tiberi General Manager/Manager
Evan Ritter Lead Grower/Lead Grower

Respondent’s 2019 Form 2.1 disclosed no other persons or entities as owners, key persons, controlling parties or other interest holders including Part I, Section B⁸, Part II⁹, and Part I, Section D¹⁰ which listed “N/A”.

11. The 2019 Renewal was granted by the Department, with the License dated May 21, 2019, and an expiration of May 21, 2020.

12. On May 20, 2020, Respondent submitted to the Department Respondent’s *Renewal Application for Medical Marijuana Cultivator License* (“2020 Renewal”), which included an updated Form 2 (“2020 Form 2”), that identified the following individuals and their ownership interests in Part I, Section 1 (and in an attached organizational chart):

Vinicius Cordos 25%
Clifford Bedar 25%
Michael H. Lemoi 50%

13. The 2020 Form 2, Part I, Sections 2, 4, 5 and Part II¹¹ did not identify any individuals, but Part I, Section 3, disclosed the following other individual interest holders, their titles and the description of their duties (among other information):

Samuel Cordos Facility Manager/Manages Cultivation Facility
Dorian Ferreira Dir. Of Operations/Oversees All Growing Operations

Respondent’s 2020 Form 2 disclosed no other persons or entities as owners, key persons, controlling parties or other interest holders.

⁸ The instructions for this Section B were as follows: “List all Directors, Officers, and Managers of the Applicant and any other entities described in Section A.”

⁹ The instructions for this Part II were as follows: “**Whom** besides the owners and other Key Persons listed in this application (including persons, firms, partnerships, corporations, limited liability companies, trusts), will loan, give **or otherwise provide** money, **property interests**, equipment, inventory, furniture, **licensing or other proprietary rights to or use in this business**, or hold a security interest therein, or who will receive money, profits, **proprietary rights or other interests** from this business. Attach a separate sheet if necessary. **If any such person is an entity list all persons with any ownership in or control of that entity.**” [Changes from the previous version in bold type.]

¹⁰ The instructions for this Section D were as follows: “List all persons (other than persons already listed in Section A, B or C above) who have any financial interest with respect to the applicant any other entities described in Section A or C, the cultivator license, operations and/or licensed facility (whether they have an ownership interest or not); if any such person is another entity, list all persons with any ownership in or control of that entity.”

¹¹ The 2020 Form 2, Part III, instructions were: “**Who**, besides the owners and other **Interest Holders** listed in this **Form 2** (including persons, firms, partnerships, corporations, limited liability companies, trusts), will loan, give or otherwise provide money, property interests, equipment, inventory, furniture, licensing or other proprietary rights to or for use in this business, or hold a security interest therein; or who will receive money, profits, proprietary rights or other interests from this business. Attach a separate sheet if necessary. If any such person is an entity list all persons with any ownership in or control of that entity.” [Changes from the previous version in bold.]

14. The 2020 Form 2 was signed by Cordos and dated May 18, 2020, under the following statement:

“The undersigned, after due inquiry, further certifies to the Department that, except for the license that is the subject of this Form 2 and except as permitted under R.I. Gen. Laws § 21-28.6-12(b)(10), no “interest holder” disclosed herein is an “interest holder” with respect to any other license issued by, or license application made to, the Department as to a “marijuana establishment licensee” as defined in R.I. Gen. Laws § 21-28.6-3(17).

The undersigned hereby acknowledges and agrees that the applicant/licensee has a continuing obligation to disclose any changes and shall provide written notice to the Department within thirty (30) days of any change of the persons/entities/interest holders described and the certifications made in this Form 2 and that each such notice shall include an updated Form 2.

Under penalty of perjury, I hereby declare and verify that all statements on and information submitted with this Form 2 are complete, true, correct and accurate.”

15. The Department granted the 2020 Renewal, with an expiration date of May 21, 2021.
16. On or about August 11, 2020, the Department received from Raymond R. Jenkins III (“Jenkins”) an application which designated him as an “Employee” for work at Respondent’s licensed facility, which was signed and dated August 7, 2020 under the penalty of perjury, and which the Department approved with an expiration date of August 11, 2020.
17. On September 3, 2020, Dorian Ferreira was arrested and charged with Possession of Marijuana with Intent to Distribute, Possession of a Controlled Substance (Honey Butane Oil), two counts of Possession of a Firearm while in Commission of a Crime of Violence (distributing narcotics), and Controlled Substance Conspiracy; the Department issued an Order to Show Cause to Mr. Ferreira regarding the substance of that arrest, DBR No. 20MM12.
18. On September 4, 2020, Respondent’s Counsel informed the Department that Dorian Ferreira “was arrested for having an amount of cannabis in excess of his patient limits. Vince Cordos, the owner of OBs, has asked that I let DBR know of the arrest and also asked that I advise you that he does not have any ownership interest in the cultivation, though he is listed on the Form 2 as Director of Growing Operations.”
19. On September 8, 2020, Respondent’s Counsel communicated via e-mail to the Department that “Due to the arrest of Dorian Ferreira, Organic Bees would like to make an offer of employment to Emily Warner for the position of “Production Manager” or similar grow management. I am advised that they are in the process of getting the application documentation together to submit to OCR;” the same information was

- transmitted in a letter dated September 11, 2020 from Vinicius Cordos to the DBR Associate Director.
20. By letter dated October 5, 2020, the Department approved Respondent's request to appoint Emily Warner as Respondent's Production Manager.
 21. On October 14, 2020, Emily Warner was arrested and charged with Possession with Intent to Deliver Marijuana, Possession of Marijuana in Excess of 5kg, and Conspiracy to violate the Controlled Substances Act, ultimately resulting in indictment P1-2021-0168BG.
 22. On October 14, 2020, Respondent's Counsel informed the Department that Emily Warner had "been arrested by the RI State Police for a marijuana related crime," and that "Ms. Warner will have no further employment or involvement with Organic Bees. The owners, Mr. Cordos and Mr. Bedar, along with Mr. Sam Cordos will be moving quickly to find a suitable replacement for Ms. Warner."
 23. On November 9, 2020, Respondent's Counsel e-mailed a letter dated October 29, 2020 from Vinicius Cordos to DBR Associate Director, Respondent informed the Department that Ms. Warner "has been relieved of her duties as Director of Operations due to her arrest," and "We have promoted a long-standing employee, Antonio Conca, to the position of Facility Operations manager, pending OCR approval. Mr. Conca has been with Organic Bees since the business started and is a respected and valued employee." The Department has not approved Respondent's request with regard to Mr. Conca.
 24. On or about January 13 and 14, 2021, Respondent's Counsel informed the Department by e-mail that Cordos had informed her that the Rhode Island State Police ("RISP") had "raided Organic Bees," the cameras were shut off, and that Jenkins "has not been a staff member of Organic Bees for several months. He is no longer affiliated with Organic Bees and has no access to the property."
 25. During a phone conversation on January 14, 2021, Respondent's Counsel informed the DBR Associate Director that Michael Lemoi's counsel had been working on a redemption agreement with respect to Mr. Lemoi turning in his shares. Later that day, Respondent's Counsel sent the DBR Associate Director an e-mail stating "I do not have the redemption agreement from Attorney Celeste." However, Respondent's Counsel included in the e-mail a letter signed and dated October 23, 2020, from Michael Lemoi to Vince Cordos ("Letter"), with the following statement: "This letter is to confirm that I, Michael Lemoi, Jr. have assigned all of my membership interests in Organic Bees LLC ("Company") to the Company, and no longer hold any interest, effective this date." Respondent did not provide prospective notice of this divestiture to the Department.
 26. On or about January 25, 2021, Respondent's Counsel provided OCR with the Letter, Respondent's *Assignment of Ownership Interest* document, signed and dated by Michael Lemoi on September 29, 2020 and purporting to convey his three thousand

two-hundred and twenty-three units of membership back to the Respondent, and Respondent's updated *Operating Agreement*, listing Cordos and Bedar as each having a fifty-percent (50%) investment interest in Respondent.

Undisclosed Interest Holders, Key Persons, and/or Individuals with Managing Control

27. On or about February 10, 2021, the RISP supplied the Department with certain information relative to the execution of a search warrant, which resulted in the seizure and search of a cellular telephone belonging to Raymond R. Jenkins III, a.k.a. "Scarface" ("Jenkins") of 32 Niverville Street, Johnston, Rhode Island, and ultimately a Cellebrite forensic report extracting the data on said seized cellular telephone. Among the thousands of pages of text messages, e-mails, and pictures extracted from Jenkins' phone and detailed in the Cellebrite report are the following verbatim group text communications and summaries:

A) *Ray Jenkins (cellphone owner), John Conti, Dave Bees, and Scorp.*

- i. These text messages begin on July 18, 2017 from "Dave Bees" to the group with the message: "they are sending the background checks to the DBR today. For myself and Evan."
- ii. On December 26, 2017, the group exchanges texts regarding the buying of digital currency called PacCoin.
- iii. On January 9, 2018 Scorp texts the group: "Coins are purchased, need to wire money Friday morning, please get money to me by Thursday night." Conti replies: "Ok." Scorp then texts: "we were given an extra 15 million shares as a gift, which was very nice of him, we all get an extra 3 million." Conti replies "Nice, already making a profit. [Thumbs up emoji.]" On January 11, 2018, Scorp texts "encryption complete. Now we just wait." In response, Conti writes: "Tommy, see me today and I will give you a check this morning or this afternoon. I'll make it out to you or whoever you want." Scorp replies: "Need cash to wire," and Conti says "Ok I'll go to bank and cash check for you." About four hours later Conti texts "Just went to the bank you can come anytime you want. I'm at work all day until at least 6:00." On January 13, 2018, Jenkins texts: "Ray confirming receipt of the money. I jus[t] sent you 30mil more PACs. I wanted to make sure you got a real good deal on this. You should have 90 mil total now" and "Just received that from Vince" and "Very nice of him." Scorp relies "nice will check main computer when I go back," there are several emoji based text exchanges and then four minutes after Scorp's last text he says "for the love of everyone involved I will offer you 5 million to walk away and take your name off everything. You know in the end if s not going to finish good." Two hours and sixteen minutes later, after texts discussing setting up an in-person meeting, Scorp texts: "ok here goes. All those who invested 1000. Get 11.1% which is 4.995 million shares, the extra 45 million

shares will be divided equally, 9 million each, bringing total for \$1000.00 invested 13,995 million shares.”

- iv. There are many group texts between January 9, 2018 and May 8, 2018. The subjects of these text messages include but are not limited to: setting up times and places for in-person meetings, casual and friendly banter, construction of the Facility, purchasing carbon monoxide detectors, scheduling and preparing for the State Fire Marshal inspection, invoice documentation, DBR’s requirements and inspections, and obtaining the Facility’s Certificate of Occupancy from the City of Pawtucket.
- v. On May 8, 2018, Jenkins sends the following text to the group: “Are the funds cleared.” Dave Bees responds: “No I have not received any funding.” Jenkins responds “I thought Vince was sending it.” Dave Bees replies: “According to him last week he was sending it I have not receive anything the last time I spoke with him was Friday he said he was working on it and he would get it out to me.” Jenkins responds: “K” and “Stay on it with him.” Dave Bees replies: “Just had a text from Cliff just now said it’ll be cleared tomorrow.” Jenkins replies “K” and “How much?” Dave Bees says “Vince just called me he said the money would be there tomorrow a hundred k.” Jenkins states “Brings it to 740.” Dave Bees replies: “7flat.” Jenkins states: “U said 640 last meeting U needed 150 to make 790.” Dave Bees then replies: “No they have issued 600,000 to me.” A discussion regarding carbon monoxide detectors and the accountant ensue and then Scorp sends the following text to the group: “we have 3 bills to pay with that. License 35,000. Lights 35,000. J lot??? Going to need operating money.”
- vi. On May 21, 2018¹², Jenkins sends the following text to the group: “License is READY. From Lisa.” Dave Bees responds, “I am heading there now.” On the same day at 6:58 p.m. Dave Bees sends a picture of the signed Organic Bees CV0058 License to the group. John Conti responds: “Finally!!!! Yes!!!!”
- vii. On May 22, 2018, Jenkins texts “Guys I’m going back and forth w Vince.. he saying we are 150,000 over budget” and then “Does anyone have the original cost sheets.” Dave Bees replies: “I do I will send it” and Jenkins replies “K.” One minute later Dave Bees sends a text with the first page of a document entitled “Summary of Proposed Terms for Vinicius Cordos, Cliffard Bedar & Anthony Rosciti \$657,700 Investment February 24, 2017” and on letterhead stating “CORDOS Fund Raise.” Jenkins replies: “It’s raining I can’t read it yet.” Conti replies: “\$657,700 original investment. \$150,00[0] over budget takes us to \$807,700.” Conti says “We didn’t spend \$807,700” and then “Or did we?” After Jenkins states the need to meet, Dave Bees states: “We did not we are at 700,000.00.” Later in the thread, Scorp states: “Original amount of 657 was to include everything including operation cost.” Conti replies at 12:35 p.m. with a

¹² See ¶ 1.

photo of the cost estimates contained in the “Summary of Proposed Terms for Vinicius Cordos, Cliffard Bedar & Anthony Rosciti \$657,700 Investment February 24, 2017.”

- viii. On May 22, 2018 at 1:55 p.m., John Conti (“Conti”) texts the group: “Cliff asked about additional funds during our meeting at Lisa’s with Anthony present and we said they are the investors and they will be responsible for additional funds. We can work out the terms when needed and their investment will be paid back first. Does anyone else remember the conversation. We were all present.”
- ix. On May 29, 2018, Dave Bees texted the group: “Just wanted to give everybody a heads up I just got a call from Vince and Cliff they are flying in on Thursday would like to come to the facility Vince stated he was going to bring additional funding with him for the account.” And a little while later from Jenkins: “Did he mention any condition on the money” and “Or the amount.”
- x. On June 4, 2018, Jenkins texts about negotiating with Summit, whether Anthony cut a deal with Slater, and when the group will be able to transfer plants into the Facility.
- xi. On June 11, 2018, when Jenkins texts that “Pawtucket police are at the building.” Scorpio replies: “why they there,” and Dave Bees replies: “My other building,” “I’m in trouble here,” and “Have tags but I’m over.” Dave Bees also texts the group, in response to Jenkins suggestion to call security, “No need it’s my other building my person grow,” and again “Have tags but I’m over.” The last text on the thread is from John Conti to the group on June 11, 2018 at 7:17 p.m.: “If Lisa can save this license it’s a miracle.”
- xii. Upon information and belief, “Scorp” as the contact in Jenkins’ phone is Thomas Scorpio III. Mr. Scorpio’s offices are located at 570 Wellington Ave. in Cranston, which is the location of AAA Mobile Warehousing. Both the address on Wellington Ave. and the name “AAA” are used in the text messages to arrange in person meetings. Additionally, Thomas Scorpio III is the Vice-President and Secretary of AAA Mobile Warehousing¹³ as represented in the *2021 Annual Report for the Corporation* filed by JT Associates, Inc.
- xiii. Upon information and belief, “Dave Bees” as the contact in Jenkins’ phone is David Ferrante, initial part owner of Respondent who was arrested on June 11, 2018, which is outlined in ¶ 6, and referred to by “Dave Bees” in the group text message on June 11, 2018 as described in ¶ 26(A)(xi).
- xiv. Upon information and belief, the individual identified as “Anthony” at various dates and times in the text chain, and who is identified as “Anthonyr” in Jenkins’ phone as an Microsoft Outlook Contact (a “Contact”), is Anthony Rosciti Sr.,

¹³ A *Fictitious Name Statement* was filed with the Office of the Secretary of State for this name on January 7, 2011; the legal name of the business is JT Associates, Inc.

who is referred to in the original Cordos Term Sheet dated February 23, 2017 and sent by John Conti and Ferrante via text message on May 22, 2018, described in ¶ 26(A)(vii), and who was a signatory to a Settlement Agreement with the United States of America as a Member/Manager of the Rosciti Construction Company, LLC on December 15, 2016.

- xv. Upon information and belief, the individual identified as “John Conti” in Jenkins’ phone as a Contact is John Conti, Senior Deputy Chief of Staff for the General Assembly, as reported by the *State of Rhode Island Transparency Portal*.¹⁴
- xvi. Upon information and belief, the individual identified as “Lisa Holley” in Jenkins’ phone as a Contact, and “Lisa” and/or “the lawyer” in ¶ 26(A)(vi),(viii), (xi), and ¶ 26(B)(ii), (iii), (vi), and (xxv) is Respondent’s Counsel Lisa S. Holley, whose office is located at 536 Atwells Ave., Providence.

B) *Ray Jenkins and Vince Cordos.*

- i. On March 22, 2017, Jenkins texts Vince Cordos (“Cordos”): “Vince..its Raymond...I forgot to mention it’s also zoned agricultural which is most considered in Rhode Island.” Cordos replied: “Thanks Raymond.”
- ii. On March 24, 2017, Jenkins texts Cordos: “Vince...its Raymond...the lawyer is putting together the application together this week...Lisa doesn’t seem to think there are any negative issues with our application.” Cordos replies “Ok TY for heads up.”
- iii. On April 13, 2017, Cordos texts Jenkins: “Ray What is the business address of RI RRC. I am addressing the letter to David Ferrante correct? He is the president of RI RRC.” Jenkins responds “Lisa will know Vince.”
- iv. On January 9, 2018, Cordos texts Jenkins: “Are you next to a computer” and “Want to send a test transfer 1st.” Jenkins replies: “My guy is” and “go ahead.” Cordos replies: “2 min” and Jenkins replies: “just came through 2,500 shares.” Vince replies with a snipped image of a wire transaction number between Jenkins and Vince Cordos in the amount of nine thousand dollars (\$9,000) and Jenkins states: “It’s workin.” Cordos then states: “Good coming now 9k.” Jenkins replies: “Thanks my friend...I appreciate this Vince,” and “I’ll wire you 9k Friday when I’m home Vince.” Cordos then texts with IMG_4583 and “Since you are part of the family, I sent a Christmas Bonus,” “I sent 60 Mil,” and “Did U get it?” Jenkins replies “Got it..you I encrypt the wallet. [sic]” Cordos responds: “yes.” and “Then you have to open it.” Jenkins replies: “My friend...THANK YOU!!!!!!” Cordos then texts: “You received it?” and “You are welcome.”
- v. On January 13, 2018, Cordos texts Jenkins: “Ray confirming receipt of money. I just sent you 30mil more PACs. I wanted to make sure you got a real good deal

¹⁴ www.transparency.ri.gov/payroll/.

on this. You should have 90 Mil total now.” Jenkins responds: “Vince, my friend,, I don’t know how to thank you!!!!!!”

- vi. On June 12, 2018 Jenkins texts Cordos: “In light of current situation we need to move to divest David immediately from the DBR license. Lisa will communicate with DBR if you direct her to do so. This is Raymond..... sooner she receives your e-mail the faster it can be accomplished.....” Cordos responds: “Ray I heard, and I am saddened by the horrible news. I am out in CA for a funeral returning on Wednesday. However, Cliff is on it and communicating with Lisa as we speak. Thanks for the update.” Jenkins replies: “I send my regards to your lose.... We are absolutely fine and I have everything under control and in proper Order.... We will not miss a beat my friend....my word!!!!!! Raymond.” Cordos then states: “Is anybody bailing out David?” Jenkins replies: “Yes” and “When I see the lawyer I’ll know what’s up??? However,, we are moving forward smoothly and I can’t see any major issues going forward.”
- vii. On September 24, 2018, Cordos texts Jenkins: “We are meeting with Chris and Anthony then have to make a run to the bank since we are short and need to deposit more funds for Operations.”
- viii. The report reveals no texts between Jenkins and Cordos between September 24, 2018 and May 19, 2019.
- ix. On June 3, 2019, Jenkins texts Cordos: “Vince, Raymond,, I’m no longer in this partnership I’m turning my shares over to Dave... Vince, this was my deal and I’ve been nothing but honest and loyal to you...however the same has not been reciprocated to John and I...I can go into detail but John has already done a year ago.... Whatever is going with you and Dave over there isn’t what I intended for my dearest friend Anthony when I approached him and myself and John included..... I want nothing to do with what is going on there not my plan and mostly my style.... I hope you and Dave’s plan goes as you plan and you do well.....I’m no longer involved..... god bless.... FYI I thank you the opportunity hopefully it ends the way you intend.... Raymond.” Cordos responds with information regarding getting Dave in to do emergency electrical work, the dehumidifiers, and plant mildew. Jenkins responds with: “Vince,, I had the answer a year ago my oldest and most trustworthy friend John Conti walk and left his shares on the table.... You refuse to listen to anyone but Dave....The favor I called in for you getting Dorian and you never had the respect or decency to call me or Lisa... Vince huge mistake on your part what I have invested in this project you will never know....” Several texts from Jenkins follow regarding dishonor and the project and then he texts: “Vince,, Dorian is known as a top grower in the state with a reputation that follows... even if he wasn’t he’s not a scumbag like we have there now.... Your still not listening to what and why this project is failing.”

- x. On June 5, 2019, Jenkins texted Cordos: “That email should have set off gigantic alarms and they should have conducted an audit then and there and the fraud would have been exposed and we could have fixed everything. They would be paid back in full and we would have made a almost a million dollars profit. At 100 per month it’s 1.8 million. At 200 per month it’s 3.6 million. From John” and “This morning” and attaches a photograph of an email between Jenkins and Organic Bees' former accountant Greg Porcaro. Cordos responds: “Ray I respect you and your team. I am always willing to listen, and there is always a process. Let’s talk on Friday.”
- xi. On June 7, 2019, Jenkins texts Cordos “Did the elevator guy contact you?” Cordos responds “Not yet,” and Jenkins states: “K.”
- xii. On June 11, 2019, Jenkins texts: “What’s up” and Cordos responds: “Ray I talked to Cliff and he is on board with our plan to bring Dorian in” and “Sam, my brother will be back there in RI by Thursday night.” Jenkins responds “Awesome I’ll call u later.”
- xiii. On June 13, 2019, Jenkins texts: “What can I do for Sam?? What does he need?” Cordos replies: “Nothing yet! He is in Providence running around to get his clearance” and “Just finished with his fingerprints and will be submitting all info to DBR,” then “TODAY.” Jenkins replies: “I don’t want him being left on his own.” Cordos replies: “He is not! He has your contact info and Anthony’s!”
- xiv. On June 18, 2019, Jenkins texts: “U still want to meet with john at the state house?” and Cordos replies: “Sure if he has time.” Jenkins then texts “Your call” and Cordos replies: “I am in.” Jenkins then texts: “K” and “I’ll tell him 12ish.” Cordos then texts at 11:27 a.m.: “We are here at the hotel.” Jenkins texts: “K.” Cordos responds with: “We can meet you there if you like” and “Send us the address.” Jenkins then texts: “I’m two min.” Cordos responds “Ok.” At 11:34 am Jenkins texts “Hrrr” [sic], Cordos responds with “We are in Sams truck upfront” and Jenkins replies with “Here.”
- xv. On June 21, 2019, Jenkins texts Cordos: “What’s up??? Have you and Dorian finalize the deal yet? As soon as that happens I can get moving on getting him in with Sam if that’s the direction our group is going... I spoke with Mike yesterday and we are both on the same page as well.... Keep me posted.” Cordos replies: “Mike Lemoi” and Jenkins responds: “Yes.” Cordos then texts: “Yes, we will have a contract out for him today.” Jenkins responds: “Awesome bro.” Cordos replies “By EOB” and Jenkins states: “Mike agreed with my game plan as well with you.” Cordos replies: “I met and talked to him and Anthony” and “They are onboard.”
- xvi. On January 20, 2020, Jenkins and Cordos text regarding the power shut off by the landlord, Richard. Jenkins texts: “Stop paying the rent and we have them

confessing he shut it down,” and “He’s totally responsible for our loses,” and then later “Turn the tables on him we have a bad lease anyway!!!!!!!!!!”

- xvii. On January 25, 2020 “I was in RI last week and met with Mike and Anthony. I got the blessings from both to email you documents showing that Anthony is no longer associated with Organic Bees” and “I will email you those docs Monday morning.” Jenkins responds: “I spoke w Anthony a few weeks back as well.” Cordos replies: “He said to go ahead and move forward.” Jenkins texts “I was Judy checking in with you” and “We are still a team!!!! It just has to look this way... he’s enemies w them...” Cordos responds “Awesome.” Jenkins replies “Stay in touch” and Cordos texts: “We have quiet a bit of product we can sell now” and “Let’s do this.” Jenkins replies: “I got us!!!!”
- xviii. On February 15, 2020, Cordos texts: “Good morning. I hope all is well. Do you have an update on Slater Center sales pick up?” Jenkins texts: “I’m on it Vince their meeting early this week...” Cordos states: “Sounds positive” and Jenkins replies: “I’ll make call now n see if anything happened.” Later in the day, Jenkins texts: “My guy has a corporate meeting set up for Thursday morning. He is very optimistic. If so we will be doing business ASAP.”
- xix. On February 24, 2020, Cordos texts: “Ray Happy Monday. I hope you had a great and productive weekend. Any news on the buyers?” Jenkins replies: “I’ll have answer by tomorrow...however,, I’m pretty confident we will be ok!!! My was awesome and I hope yours was as well [high five emoji][high five emoji]” and then “My friend,, it’s a go” and then “[high five emoji].” Cordos responds: “Awesome” and “When are they picking up?” Jenkins replies: “Their contacting Dorian later today....I’ll know more then.”
- xx. On March 18, 2020, Jenkins texts in response to Cordos’ reference to paying bills, “We have over 30k coming next week from slater.” Cordos responds with “Awesome” to which Jenkins replies “We will healthy within 4-6 weeks bro.”
- xxi. On March 19, 2020, Jenkins texts Cordos: “I spoke with Lois and I texted Dorian to see when I can go by today to get some printouts of what Lois updated. Also, Lois would like you to speak with Vince so he can give her the ok to meet with you and I going forward. From John...john is going to come help me and Lois run the office along with Sam..... you will be beyond pleased and have a pleasure having john back bro..... at no cost just his own interest...”
- xxii. On April 8, 2020, Jenkins texts: “Checking in,, hope you and your loved ones are safe and well...we are making much progress for the good even under these times with OB... stay well and safe I’m available always Vince.”
- xxiii. On May 5, 2020 Jenkins texts Cordos regarding who is handling the renewal.
- xxiv. On July 17, 2020 Jenkins texts: “Slater picked up everything again” and then “58k.”

- xxv. On September 3, 2020, Jenkins texts: “Vince I know heard the bad news... I have the place under total control ... Lisa has me approved to work here 10 hours a week and I’m approved with and have my card from DBR... I have the head cultivator from slater working here as well.... Place can’t be in better shape... I GOT YOU and ANTHONY!!!!!!!!!!!!” and “And yes I have Dorian as well as I know you care too.”
 - xxvi. On September 10, 2020, Jenkins texts: “Vince at some point I think we need to communicate.... I’m there hands on full time I left my job to cover this ...¹⁵” Later, Jenkins texts: “It will be regularly extremely soon if you work w me!!!! Emily is god sent!!!!!!!!” Cordos texts later: “Great job for stepping in and bringing Sales and Emily on board.” Jenkins texts later: “We are not in trouble Emily is our savior.”
 - xxvii. September 17, 2020 is the last date there are text messages between Jenkins and Cordos and they concern pick up of current and future product.
 - xxviii. Upon information and belief, “Emily” as referred to by Jenkins in his text messages and is Emily Warner, of 88 Governors Hill, West Warwick, RI, former employee at Organic Bees, whose arrest is described herein at ¶ 21.
 - xxix. Upon information and belief, “Lois” as referred to in Jenkins’ e-mails, texts messages and cellular phone contact entry for “Lois Hayes” is Lois M. Hayes, registered agent for L M Hayes, LLC, 4A Spyglass Cir., Hope Valley, RI according to the *Articles of Organization* filed with the RI Secretary of State’s Office (“SOS”) on March 26, 2018. The 2019 Annual Report for L M Hayes, LLC filed with the SOS on September 20, 2019 states that the character of its business is “Human resources and general business consulting and services for small businesses,” and states the owner is Lois M. Hayes. The 2020 Annual Report for L M Hayes, LLC filed with the SOS on October 8, 2020 changes Lois M. Hayes’ title to “Owner/Manager.”
- C) *Ray Jenkins and Paul Larisa*. Texts between Jenkins and Paul Larisa (“Larisa”) begin on December 17, 2019, and discuss meeting in person multiple times, the sale of marijuana and trim, pick-up dates and times, assistance on locating trimmers, and payment arrangements.
- i. On March 30, 2020, Jenkins states: “I’m just try[ing] to keep my investors comfortable so Vince doesn’t abandon me...”
 - ii. On November 9, 2020, Jenkins states: “Room 4 has seeds which 11,400 (25 lbs) And I have 50lbs of trim. Whatever you can do is appreciated bro..”

¹⁵ This ellipsis represents more content of the text that was not replicated here. All other consecutive periods are replicated exactly as in the associated text message.

- iii. On November 24, 2020, Jenkins states: “You think it would be a good move for Gerry to purchase it? You guys have all the knowledge to fix it and plus it’s potential works for everyone. Larisa replies: “That would be fantastic, but can’t can only have 1.” Jenkins states: “Ways around that” and “I’m sure he can come up with straw buyers¹⁶” and “Btw, if you can pick up whatever works for you to get some monies there it would help my negotiation’s [sic].”
- iv. Upon information and belief, the individual referred to in Jenkins’ texts as “Paul” and as a Contact in Jenkins’ phone as “Paul Larisa”, is Paul Larisa, the Director, Processing Operations – Manager of the Thomas C. Slater Compassion Center (“Slater”).
28. Also found in Jenkins’ phone were e-mail strings between him, via the address [REDACTED], Vince Cordos at [REDACTED], Clifford Bedar at [REDACTED], and Sammy Cordos at [REDACTED], wherein on October 26, 2020, Jenkins writes: “Vince I’m not able to purchase OB for your 1 million so my offer is three to get you your 1 million which my group can purchase up to 30 percent on top of the 38 already owned @ 10,000 per share which is beyond fear [sic] and reasonable since the shares of OB stand next to zero today. I need to know where you stand Vince so I know where my group stands before my meeting? RAYMOND.” On the same day, Vince replies, including: “However we are willing to sell you the 30% for \$500,000 or sell 100% to you and we would walk away for \$ 750k. We will take a \$250k loss. Do you have somebody to be on the license? Otherwise we will fold the entire company and write off all the losses.”
29. On or about February 10, 2021, the RISP also provided DBR with information obtained by search warrant from the Respondent’s accountant, Greg Porcaro, including but not limited to: (1) a bill for legal services in the amount of five thousand three-hundred and eighteen dollars and seventy-five cents (\$5,318.75) from Duffy and Sweeney, LLC, dated February 25, 2019 and addressed to “Organic Bees Raymond Jenkins David Ferrante” for services on January 2, 2019, January 4, 2019 and January 22, 2019; (2) a check record in the amount of five thousand three-hundred and eighteen dollars and seventy-five cents (\$5,318.75) paid on March 6, 2019 by Organic Bees to “Duffy & Sweeney”; and (3) a document titled “Summary of Proposed Terms for Vinicius Cordos, Clifford Bedar & Anthony Rosciti \$657,700 Investment February 24, 2017,” signed by Vinicius Cordos and Clifford Bedar. The document appears to be the same document referred to by Jenkins, John Conti, Thomas Scorpio, and David Ferrante and exchanged via text message on May 22, 2018 and described in ¶ 27(A)(vii).
30. Another item obtained via search warrant from Porcaro and provided to DBR in connection with ¶ 29 was a white binder containing Respondent’s medical marijuana

¹⁶ According to Lexico, a “straw buyer” is: “A person who buys something on behalf of another person in order to circumvent legal restrictions or enable fraud.” (www.lexico.com/definition/straw_buyer; “Oxford English and Spanish Online Dictionary, Thesaurus, and Spanish to English Translator”.)

transportation manifests and sales receipts, including: (1) a manifest dated February 28, 2020, documenting the sale and transfer of eight thousand one-hundred and seventy-two (8,172) grams of marijuana to Slater¹⁷; (2) a manifest dated March 13, 2020, documenting the sale and transfer of twenty-eight thousand seven-hundred and ninety-four (28,794) grams of marijuana to the Slater¹⁸; and (3) a manifest dated July 17, 2020, documenting the sale and transfer of twenty-six thousand seven-hundred and forty (26,740) grams of marijuana to Slater¹⁹ (the associated purchase order states twenty-six thousand nine-hundred and eleven (26, 911) grams of marijuana was initially purchased).

Criminal Convictions

31. On September 25, 2006, Raymond Jenkins pled nolo contendere in Providence County Superior Court to counts 1, 2, 3, 5 and 8 of P1-2006-1173A, *State v. Raymond Jenkins*; R.I.C.O, Conspiracy to Commit R.I.C.O, Organized Crime Gambling, Bookmaking – 2nd Offense, and Possession with Intent to Deliver a Schedule III/IV Controlled Substance, respectively. Jenkins received a total of ten (10) years suspended, with thirty (30) months to serve, and the remainder suspended with probation.
32. On February 23, 2012, Jenkins pled guilty in the U.S. District Court for the District of Rhode Island to one count of conspiracy to violate the Hobbs Act²⁰ by participating in extortion. Jenkins was sentenced to thirty-seven (37) months in prison.

Untagged Marijuana Product

33. On January 13, 2021, OCR’s Senior Economic and Policy Analyst (“Senior Analyst”) conducted an inspection of Respondent’s Facility. Out of six (6) rooms inspected, all plants and product were labelled, with the exception of the two rooms where inventory was stored. In Inventory Room #1, the Senior Analyst found a mini refrigerator where the following untagged items were stored: six (6) small mason jars filled with sift or kief; two (2) large mason jars filled with sift or kief; four (4) plastic cups filled with sift or kief; six (6) small plastic containers of seeds. In Inventory Room #2, the Senior Analyst found one bag of marijuana trim that was not labelled.
34. On April 16, 2021, based on the totality of the FOREGOING, the Department issued an Order to Show Cause (“OSC”) detailing its sufficient cause to pursue an administrative action against the Respondent because Respondent had failed since its initial application and through and including its renewals and to the present to disclose in its Application and continuing Form 2 disclosures all interest holders and/or key persons in the Respondent applicant/licensee including all persons having ownership interests and/or managerial and operational control, including but not limited to

¹⁷ See ¶ 26(B)(xix).

¹⁸ See ¶ 26(B)(xix).

¹⁹ See ¶ 26(B)(xxiv).

²⁰ Second Superseding Indictment, Criminal No. 11-004-02S.

- Raymond Jenkins, Anthony Rosciti Sr., Thomas Scorpio III and John Conti; that Respondent failed to comply with its obligation to continually update, amend and correct information submitted to the Department including its continued and ongoing omission of interest holders and/or key persons including but not limited to Raymond Jenkins, Anthony Rosciti Sr., Thomas Scorpio III and John Conti, in its Form 2 filings with the Department, including the 2019 and 2020 Renewals all in violation of the Former Regulations §§ 1.5(D)(2) and (D)(2)(f), and the Regulations §§ 1.3(E)(5), (H)(2), (J)(2) and §§ 1.13(C)(2)(a) and (o).
35. The OSC also detailed the Department’s position that to the extent that Raymond Jenkins is an interest holder in and/or key person for Respondent, Respondent and Jenkins each failed to notify the Department of his disqualifying convictions, all in violation of R.I. Gen. Laws § 21-28.6-16(k) and (l), the Regulations § 1.13(C)(2)(a),(b),(c),(f),(g),(h) and (o).
 36. And lastly, the OSC specified it was the Department’s position that Respondent possessed untagged marijuana product in the form of unlabeled marijuana Keif and trim on January 13, 2021, in violation R.I. Gen. Laws § 21-28.6-15 and the Regulations, § 1.6.1(A) and (B).
 37. On April 15, 2021, as a result of the RISP investigation into Respondent described in ¶ 27, Jenkins was arraigned on three criminal charges: Perjury, Giving a False Document to DBR, and Conspiracy to Commit Giving a False Document to DBR.
 38. Respondent submitted its Application for Renewal of its Medical Marijuana Cultivator License on May 20, 2021 (“Renewal”). Because the remedy the Department sought in the OSC was License revocation and denial of Respondent’s License Renewal, the Department did not deposit and instead returned the bank check in the amount of twenty-thousand dollars (\$20,000.00) that Respondent submitted with the Renewal; the Department does not dispute the timeliness of the Renewal.
 39. On July 29, 2021, Jenkins pled nolo contendere to one count of Perjury for making a false material declaration on a medical marijuana cultivator application to DBR; that he was a trimmer in Respondent’s operation when he was really an owner. Jenkins received a two (2) year suspended sentence with probation for his plea.
 40. The Parties have conducted Pre-Hearing and Status Conferences with the Hearing Officer in this matter and have engaged in discovery to the extent that each side has issued and received information pursuant to a request for production of documents.
 41. In an effort to affect a timely and amicable resolution of the issues raised in this Consent Agreement without an administrative hearing with its attendant time and costs, the Department and the Respondent enter into this Consent Agreement solely for the purpose of avoiding the burdens, expenses and risks of litigation. The Parties agree to resolve this matter based upon the satisfaction of the following terms and conditions:

- a. Respondent neither admits nor denies the Department's allegations in ¶¶ 2-33 of this Consent Agreement, but acknowledges and agrees that if such allegations were presented at a hearing on the matter without proof to the contrary the Department would have demonstrated sufficient evidence to overcome its burden of proof on the violations of Law and Regulations as heretofore described in ¶¶ 34, 35 and 36;
- b. Subject to compliance with all terms and conditions of this Agreement, Respondent shall have thirty (30) days from its execution, until March 21, 2022, to offer to and complete sale(s) of Inventory (as hereinafter defined) to Rhode Island licensed compassion centers pursuant to § 21-28.6-16(e) and subject to compliance with the requirements of the Regulations §§ 1.6.1-1.6.8, 1.6.10, and 1.6.13-1.6.16. Any Inventory remaining unsold as of 3:00 p.m. on March 21, 2022, shall be destroyed by Respondent under the supervision of the Department's designated inspection personnel. For purposes hereof, "Inventory" shall mean and refer to the existing medical marijuana inventory detailed in that certain inventory certificate dated of even date herewith executed by Respondent and Respondent's counsel and approved by the Department;
- c. Respondent and the Department acknowledge and agree that the License may only be used for the limited purpose described in ¶41(b) and for no other purpose and that the proceeds from any sale of Inventory described in ¶41(b) will be exclusively used to repay the *Unsecured Convertible Promissory Note* dated January 1, 2020 issued by Respondent to Cordos Development & Associates LLC. The undersigned signatories executing this Agreement on behalf of Respondent hereby represent and warrant to the Department that Cordos and Bedar are the sole managers, members and persons holding ownership and financial interests in Cordos Development & Associates LLC;
- d. Respondent acknowledges and agrees that upon the execution of this Consent Agreement the License Renewal is withdrawn and that such withdrawal is irrevocable;
- e. Respondent acknowledges and agrees that pursuant to R.I. Gen. Laws § 42-35-14(b) and consistent with Respondent's withdrawal of the License Renewal, the License, including the limited purpose for which it may be utilized as described in ¶41(b), will immediately expire and be of no further force and effect at 5:00 p.m. March 21, 2022;
- f. In connection with ¶ 41(e), Respondent forever relinquishes any and all claims, rights, immunities and/or privileges associated with the possession of its License and/or License Renewal, the only exception to which is that Respondent shall retain the limited ability to offer for sale the Inventory pursuant to ¶41(b); and
- g. Concurrent with the execution of this Consent Agreement, Respondent acknowledges and agrees that any and all Registry Identification Cards associated

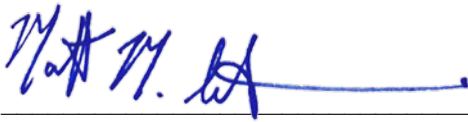
with the License are null and void pursuant to Regulations § 1.4(H)(3) and shall be returned to OCR within ten (10) days of the execution of this Consent Agreement, the only exception to which will be the Registry Identification Cards belonging to Sandra Grenga and Mike Wilson, which shall be effective only until March 21, 2022 and which shall be returned to OCR on or before March 21, 2022.

42. The parties hereby consent and agree that this Consent Agreement and its terms represent the final determination of this matter only as it pertains to Vinicius Cordos and Clifford Bedar as the current and only corporate owners, managers and members of Organic Bees, LLC and Organic Bees, LLC the entity as so constituted. The resolution of this matter with this Consent Agreement does not in any way limit the Department's ability to pursue this or any other administrative action against other persons, entities including any other individual(s) mentioned in this Consent Agreement for violations of the Law and/or Regulation heretofore alleged in the corresponding Order.
43. *Waiver of Hearing and Appeal.* By agreeing to resolve this matter through the execution of this Consent Agreement, Respondent knowingly and voluntarily waives any right to an administrative hearing and waives any right to pursue an appeal to the Superior Court under the Rhode Island Administrative Procedures Act, R.I. Gen. Laws § 42-35-1, *et seq.*
44. *Enforcement.* If the Respondent fails to comply with any term or condition of this Consent Agreement within any applicable time period set forth herein, the Respondent will be in violation hereunder and the Department shall be entitled to immediately take enforcement or other action in accordance with applicable law.
45. *Compliance; Laws.* Compliance with the terms of this Consent Agreement does not relieve the Respondent of any obligation to comply with other applicable laws or regulations administered by or through the Department or any other governmental agency.

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Signature Page

For the Department



Signature

Date: 02/18/2022

Title: Chief, Office of Cannabis Regulation
Rhode Island Department of Business Regulation

For the Respondent

Vinicius Cordos:



Signature

Date: 2/16/2022

Name: Vinicius Cordos
Manager/Member of Organic Bees,
LLC

Clifford Bedar:

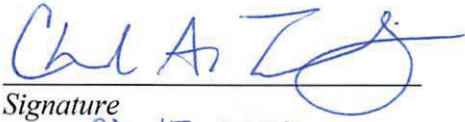


Signature

Date: 2/16/2022

Name: Clifford Bedar, Esq.
Manager/Member of Organic Bees,
LLC

Attorney for Organic Bees, LLC in
DBR No. 21OCR007:

A handwritten signature in blue ink, appearing to read "Charles Tamuleviz", written over a horizontal line.

Signature

Date: 02-17-2022

Name: Charles Tamuleviz, Esq.