
DCC Supplemental Notice of Embargo_ Euphoric Life, Inc. C11-0000305

Euphoric Life <info@euphoriclif.com>

Tue, Jun 17, 2025 at 7:47 PM

To: "Ocegueda, Ruby@Cannabis" <Ruby.Ocegueda@cannabis.ca.gov>, Wendell Bonner <legal@euphoriclif.com>, Nooshin Dalili <nooshin@dalililaw.com>

Dear Ms. Ocegueda,

Thank you for your letter dated June 4, 2025, regarding the Supplemental Notice of Embargo issued for Euphoric Life Inc. (License #C11-0000305-LIC). Please see the following remediation plan to address the issues cited in the notice, submitted in accordance with Business and Professions Code section 26039.3 and 4 CCR § 17801.5(c).

Background Context

On April 4, 2025, our compliance officer informed us of a rare and serious cancer diagnosis and immediately stepped away from her duties. To avoid any accidental errors during this unexpected transition, we halted all edits or movements within METRC until a new compliance officer was onboarded on April 21, 2025.

The new compliance officer immediately implemented a facility-wide SOP focused on preserving the integrity of UID tags in cold storage through a systematic photocopying and reaffixing process. This process was actively underway at the time of the April 29 inspection.

Item Nos. 1–9: Frozen Cannabis Flower and Concentrates (UID Tags Temporarily Removed for Photocopying)

Cited Code(s):

- BPC § 26039.5(a)(4) – Misbranding
- 4 CCR § 17398(c) – UID labeling requirements

Issue Summary:

Department staff observed cannabis flower and unfinished manufactured product stored without visible UID tags.

Response & Remediation Plan:

All products listed in Items 1–9 were already entered in METRC with assigned UID tags prior to the inspection. The tags had been temporarily removed for photocopying as part of the newly implemented SOP and were in the process of being reapplied in an orderly, bay-by-bay manner.

By the time of the inspection, the first half of the facility had been fully re-tagged. Department staff observed and acknowledged the photocopy system and organized process in the first bay. The embargoed inventory was in the final bays, which would have been completed within 2–3 days.

Since the embargo was issued, we have not reapplied tags or handled the affected product. Every other area of the facility is now fully re-tagged, and the photocopied UID system is complete, except for the embargoed freezers, which remain untouched.

Plan:

We request authorization to reapply the photocopied UID tags to the embargoed items (Items 1–9), consistent with their existing METRC assignments.

Timeline: Completion within 48 hours of Department authorization.

Item Nos. 11–16: Woodstock Live Rosin Pre-Rolls – Repackaging Without Authorization

Cited Code(s):

- BPC § 26039.5(a)(4) – Misbranding
- BPC § 26039.5(b) – Prohibited sale of misbranded product

Issue Summary:

Several Woodstock SKUs were repackaged into new containers after COA testing due to label adhesive failure, but without a formal remediation request submitted to the Department.

Response & Remediation Plan:

The affected pre-rolls were tested and passed COA prior to repackaging. The change was made solely to address label adhesive failure, not to alter or obscure product contents. We acknowledge that any post-COA repackaging requires prior Department authorization.

Plan:

We will submit a formal Remediation Request Form for these items (Items 11–16) upon lifting of the embargo. These units remain securely stored and have not been altered since the inspection.

Timeline: Submission within 5 business days of embargo lifting.

Item No. 10: Live Oro Dreamzzz Beverage – Melatonin and Product Classification Issue

Cited Code(s):

- BPC § 26039.5(a)(4) – Misbranding
- BPC § 26039.5(b) – Prohibited sale of misbranded product

Issue Summary:

This product contains melatonin—a non-permissible additive under California cannabis regulations.

Response & Remediation Plan:

We acknowledge the product is non-compliant due to ingredient issues.

Plan:

We will destroy the inventory in accordance with Department protocols once authorized and will document the process as required.

Timeline: Destruction within 10 business days of Department authorization.

Prevention Measures

To prevent recurrence, we have implemented the following measures:

1. Enhanced Training: Our new compliance officer, John Calzada (johnc@euphoriclifecomm.com), has completed additional DCC training modules and will conduct monthly staff compliance reviews.
2. Pre-Authorization Protocol: All repackaging activities, regardless of reason, now require written pre-authorization from the Department prior to execution.
3. Improved Cold Storage SOP: We have revised our cold storage procedures to maintain UID tag visibility at all times, eliminating the need for temporary tag removal.

4. Third-Party Product Review: All third-party manufactured products will undergo internal ingredient and classification review prior to acceptance into inventory.

Conclusion and Request

This embargo was issued during an active, transparent effort to improve internal compliance systems following a sudden leadership transition. No product was adulterated or diverted, and we remain fully cooperative with the Department throughout. We are committed to ensuring full compliance with the Medicinal and Adult-Use Regulation and Safety Act (MAUCRSA) (Bus. & Prof. Code § 26000 et seq.).

We respectfully request:

- Authorization to reapply photocopied UID tags to embargoed items (Items 1–9)
- Lifting of the embargo so that we may submit a remediation request for Woodstock SKUs (Items 11–16)
- Approval to destroy the Live Oro Dreamzzz beverage (Item 10) in accordance with Department protocols

We remain committed to upholding the Department's standards and look forward to resolving this matter promptly.

Sincerely,

Dr. Ahmad R. Rafii

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