

EXHIBIT A

**STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION**

CIVIL INVESTIGATIVE DEMAND

TO: KING SMOKERS LLC
204 Main Street
Portland, CT 06480

BY AUTHORITY OF THE STATE OF CONNECTICUT, and more particularly, pursuant to the Connecticut Unfair Trade Practices Act ("CUTPA"), Chapter 735a of the Connecticut General Statutes, and the authority granted the Commissioner of Consumer Protection for the State of Connecticut by virtue of Section 42-110d of the Connecticut General Statutes, **King Smokers LLC** (the "Respondent"), is hereby commanded to present to the Commissioner, UNDER OATH, by delivering to the Department of Consumer Protection, c/o Allison C Frisbee, Assistant Attorney General, Office of the Connecticut Attorney General, 165 Capitol Avenue, Hartford, Connecticut, 06106, Allison.Frisbee@ct.gov on or before **5:00 in the afternoon of April 30, 2026**, answers to Interrogatories and Documentary material in connection with an investigation into the offer and sale of cannabis without a license, which may constitute unfair or deceptive acts or practices in violation of the provisions of CUTPA. The Respondent is notified not to destroy, discard, alter in any manner, or transfer from its possession, any Documentary material requested or identified in any of the Respondent's responses to the interrogatories and Document requests herein below

I. DEFINITIONS

This Civil Investigative Demand ("CID") shall be read and interpreted in accordance with the definitions set forth below

A The terms "You," "Your," "King Smokers LLC" or "King Smokers" and "Respondent" include King Smokers LLC, its predecessors, successors, assigns, owners, parent companies, holding companies, divisions, affiliates, subsidiaries, groups, partnerships and joint ventures, as well as directors, members, officers, agents, employees, attorneys, or any other Persons acting on behalf of or under the direction, authorization, or control of King Smokers LLC

B The term "King Smokers" means the retail business bearing that name and located at 204 Main Street A, Portland, CT

C The term "All" means all or any, and "Any" means all or any

D The term "Communication" includes, but is not limited to, any conversation, discussion, letter, memorandum, meeting, note, e-mail, voicemail, text message, instant message, chat message, social media post, and any other transmittal of information, whether transmitted in writing, orally, electronically or by any other means, the metadata of any electronic Communication such as e-mail, all notes pertaining to any of the aforesaid, and any Document that abstracts, digests, summarizes, transcribes or records any Communication

E The term "Describe" or "Description" means to state with specificity all facts, including but not limited in time, comprising, or pertaining to such fact, thing, condition, action, or event, and to identify all individuals involved in such fact, thing, action, or event.

F The term "Document" means all Communications, as well as Computer Files and written, recorded, and graphic materials of every kind in Your possession, custody or control, wherever located, including without limitation information stored on social media accounts like

Twitter or Facebook and Documents contained in Collaborative Work Environments and other Document databases, handwritten notes or annotations made on a Document, drafts of a Document, handwritten, typewritten, printed, recorded or graphic matter, however produced or reproduced, and any mechanical, magnetic or electronic recording of any voice, sound, image or data, or materials on or in any Computer System or Computer Storage, in its original or native format (including any metadata) A draft or non-identical copy is a separate Document within the meaning of this term, whether due to a difference in custodian, marginalia, metadata, attachments affixed thereto, or otherwise The term "Document" shall also include all Documents that are necessary to interpret, translate, decode or understand any other Document requested

G The term "Identify" means

1 In the case of a natural Person name, current employer, business address, telephone number, email, and title or position,

2 In the case of a Person other than a natural person name, principal address, telephone number and a natural person who can be contacted for information relating to the identified non-natural person,

3 In the case of a Document, the title of the Document, the author, the title or position of the addressee, the type of Document, the date it was prepared, and the number of pages it comprises, and

4 In the case of a non-written Communication, the date of the Communication, the type of Communication (telephone conversation, number etc), the place where the Communication took place, the identity of the Person who made the Communication, the identity of each Person who received the Communication and each Person present when it was made, and the subject matter discussed

H The term “Including” means including but not limited to

I The term “Person” means any individual, corporation, partnership, limited liability company, limited partnership, trust, business trust, association, joint stock company, joint venture, pool, syndicate, “group” as defined in Section 13(d)(3) of the Securities Exchange Act of 1934 as amended, sole proprietorship, unincorporated organization, or any other form of entity

J The term “Relating To” means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, pertaining to, reflecting to, or stating

K The term “Relevant Period” means, unless otherwise noted, January 1, 2024 to the present

L “THC” has the same meaning as set forth in Conn. Gen Stat § 21a-240(59)

M. “THC Product” means Any product (*i e* , edibles, flower, vape cartridges, oils, tinctures, etc) that contains, or purports to contain, on its label or packaging, THC in any form, including, but not limited to, THCA, THCO, HHC, delta-8, delta-9, or delta-10, at a THC level greater than 0.3% on a dry weight basis or by volume, or that depicts a marijuana leaf on the label or packaging, or that purports on its label or packaging to contain THC that exceeds five milligrams on a per-container basis

II. INSTRUCTIONS

The response to this CID shall be submitted in the following manner

A *Except where otherwise expressly indicated, this CID covers the period from January 1, 2024, through the present (the "Relevant Period").* Any interrogatory or request for production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.

B This is a continuing request for information If, after making its initial response, Respondent obtains, discovers, formulates, or otherwise becomes aware of any further information that is responsive to any one or more of these interrogatories or Document requests, Respondent is required to supplement its response(s) and furnish such information as soon as such information becomes available

C For the purposes of reading, interpreting, or construing the scope of the interrogatories and Document requests, the terms used shall be given their most expansive and inclusive interpretation.

D Unless instructed otherwise, each interrogatory and Document request shall be construed independently and not by reference to any other interrogatory or Document request for the purpose of limitation.

E Documents provided shall be complete and, unless privileged, shall be un-redacted, produced as maintained in the ordinary course of business in the company's files (*e g* , Documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form, attachments produced following the parent e-mail) You may submit photocopies (with color photocopies where necessary to interpret the Document), in lieu of original Documents, provided that such copies are true, correct, and complete copies of the original Documents

F Documents should be produced as they are maintained in the normal course of business and should be labeled or organized in accordance with the requests to which they are responsive

G Each page of each Document submitted shall contain a unique identifying number that also contains a uniform alphabetic prefix identifying You All boxes, folders or media

containing submitted Documents and ESI shall be marked with Your name and the name(s) of the person(s) whose files are contained in that box or folder

H Before producing any Documents, you must contact Assistant Attorney General Allison C Frisbee at Allison.Frisbee@ct.gov to arrange a meeting or conference call with the company's personnel who are familiar with the particular ESI and the applications in which it is stored, to explain to OAG representatives the manner in which the ESI is stored, and the types of information that are available in the application. OAG representatives must approve the format and production method for ESI in advance. If responsive ESI resides in databases or applications, the company representative must be prepared to discuss queries or reports that can be run in order to furnish the responsive ESI. Electronic productions must be scanned for and free of viruses. The OAG will return any infected media for replacement, which may affect the timing of the Company's compliance with this Demand.

I Each document should be produced only once. If you plan to produce Documents and ESI that were previously produced, the current production must be de-duplicated. Please supply an index detailing the Document ID or Bates number for the current production along with every other Document ID or Bates number assigned to all Documents in relation to other productions. Produce deposition, proceeding, and trial transcripts in condensed or minuscule form, with a word index, and electronically on CD or DVD. The electronic version of the transcripts should be in Live notes PTF (Portable Transcript Format), PCF (Portable Case Format), or Plain Text format.

J If You are unable to answer or respond fully to any interrogatory or Document request, after exercising due diligence to secure information necessary to answer or respond to the fullest extent possible (a) answer or respond to the extent possible, (b) specify the reason for Your

inability to answer or respond in full, and (c) set forth the efforts You made to obtain the requested information

K Your Document retention policy should be suspended to prevent the destruction of any Documents that may be relevant to the Department of Consumer Protection's investigation as described in this CID

L Documents to be produced include all Documents in Your possession, custody, or control, wherever located, including Documents in the possession, custody or control of Your directors, officers, employees, representatives, or agents Without limitation on the term "control," a Document is deemed to be in Your control if You have the right to secure that Document or a copy thereof from another person.

M If You cannot supply precise information, state Your best estimate or approximation (including Your best approximation of date by reference to other events, when necessary), and designate the response as an estimate or approximation.

N If You contend that any interrogatory or Document demanded by this CID is privileged in whole or in part, file with Your response to this CID a statement in writing and under oath and in such statement (1) identify each such interrogatory or Document, (2) state its general subject matter, and (3) state in detail the basis for each claim of privilege made with respect to it If a claim of privilege is made to only a part of a Document, then in addition to the statement required herein, produce a copy of such Document from which the alleged privileged portion has been redacted, describing the redacted portion and basis for the redaction

REQUESTS FOR INFORMATION AND DOCUMENTS

In accordance with the requirements set forth in the “Definitions” and “Instructions,” You are specifically required to respond to the following within the time frame set forth above

INTERROGATORY NO. 1: Identify the individual or individuals providing the responses to this CID, Including name, job title and responsibilities

ANSWER:

INTERROGATORY NO. 2: Describe Your corporate and organizational structure, Including Identifying any parent companies, holding companies, affiliates and subsidiaries during the Relevant Period

ANSWER

INTERROGATORY NO. 3: Identify All Your business’s owners, officers executives, senior managers, directors, investors, and/or lenders and provide a copy of Your organizational chart, if any For each individual identified, provide his or her position within or Related To Your business, business address, telephone number and email address

ANSWER

INTERROGATORY NO. 4: Identify the date on which each owner identified in response to Interrogatory No 3 obtained an ownership share of King Smokers, the individual(s) from whom each owner obtained such a share and the remuneration paid for each such share

ANSWER:

INTERROGATORY NO. 5: Identify the date on which each investor identified in response to Interrogatory No 3 became an investor of King Smokers, the individual(s) through which the investor made the investment, and the amount invested in King Smokers

ANSWER:

INTERROGATORY NO. 6: Identify the date on which each lender identified in response to Interrogatory No 3 lent money to King Smokers, the individual(s) through which the lender lent money, and the amount of money each lender lent to King Smokers

ANSWER:

INTERROGATORY NO. 7: Describe in detail Brkat Hamad Ali's responsibilities in managing and operating Smoker's Corner LLC and Identify Any income Brkat Hamad Ali derived from King Smokers

ANSWER:

INTERROGATORY NO. 8: Describe in detail Alfareed Consulting's responsibilities and relationship with King Smokers LLC and Identify the Person(s) acting on behalf of Alfareed Consulting Relating to King Smokers and any payments made to Alfareed Consulting and/or income Alfareed Consulting derived from King Smokers

ANSWER:

INTERROGATORY NO. 9: Identify All Person(s) involved in

- a The management and operation of King Smokers LLC,
- b The filing of King Smokers LLC's Annual Report(s) to the Secretary of the State of Connecticut; and
- c The filing of Any King Smokers LLC's application(s) for any license and/or registrations King Smoker LLC holds in Connecticut

ANSWER:

INTERROGATORY NO. 10: For each person identified in response to Interrogatory No 9, Describe in detail each Person(s)'s responsibilities and relationship with King Smokers LLC

ANSWER:

INTERROGATORY NO. 11: Identify All physical addresses, post office boxes, telephone numbers, web addresses, and email addresses from which You conduct business or have conducted business in or from Connecticut, Including addresses where You store inventory

ANSWER:

INTERROGATORY NO. 12: Identify All websites that You have used in any manner to operate Your business(es) or advertise any of Your goods and services to Connecticut Consumers

ANSWER:

INTERROGATORY NO. 13: Identify All licenses and registrations You hold in Connecticut and Identify the date(s) You obtained such licenses and/or registrations

ANSWER:

INTERROGATORY NO. 14: Identify All employees, including their names, addresses, phone numbers and email addresses, who worked at Your business location(s) in Connecticut during the Relevant Period

ANSWER:

INTERROGATORY NO. 15: Identify All independent contractors, including their names, addresses, phone numbers and email addresses, who worked at Your business location(s) in Connecticut during the Relevant Period

ANSWER:

INTERROGATORY NO. 16: Identify the name and title of All employee(s), former employee(s), or independent contractors whose duties include purchasing products that are offered for sale at Your business location(s) during the Relevant Period

ANSWER:

INTERROGATORY NO. 17: Identify the name and title of All employee(s), former employee(s), or independent contractors whose duties include purchasing THC Product(s) that are offered for sale at Your business location(s) during the Relevant Period

ANSWER:

INTERROGATORY NO. 18: Identify the name and title of All employee(s), former employee(s), or independent contractors whose duties include storing, selling, or otherwise

handling THC Product(s) which have been or are being sold by You over the Relevant Period.

ANSWER:

INTERROGATORY NO. 19: Describe any due diligence You conducted to ensure that the THC Products You purchased or sold contained total THC levels lower than 3 percent on a dry weight basis or were otherwise legal to sell in Connecticut without a cannabis establishment license issued by the Connecticut Department of Consumer Protection

ANSWER:

INTERROGATORY NO. 20 Identify the landlord(s) of the premises located at 204 Main Street, Portland, CT, where King Smokers operates

ANSWER:

INTERROGATORY NO. 21 Identify Any sublessees of the premises located at 204 Main Street, Portland, CT, where King Smokers operates

ANSWER:

REQUEST FOR PRODUCTION NO. 1: Produce All Documents and/or Communications identified in response to any Interrogatory

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce All Documents and/or Communications Related To the purchase of any products that are offered for sale at Your business location(s)

during the Relevant Period, Including correspondence, billing statements, invoices, ledgers, And receipts

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce All Documents and/or Communications Related To the sale of any products that are offered for sale at Your business location(s) during the Relevant Period, Including correspondence, billing statements, invoices, ledgers, And receipts

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Produce All Documents and/or Communications Related to the purchase of any THC Product(s) that are offered for sale at Your business location(s) during the Relevant Period, Including correspondence, billing statements, invoices, receipts, And Certificates of Analysis or other Documents purporting to show the THC level of All THC Products You purchased

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Produce All Documents and/or Communications Related To the sale of any THC Product(s) that are offered for sale at Your business location(s) during the Relevant Period, Including correspondence, billing statements, invoices, receipts, And Certificates of Analysis or other Documents purporting to show the THC level of All THC Products You sold.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Produce All Documents and/or Communications Relating To King Smokers' tenancy at 204 Main Street, Portland, CT, Including any leases, subleases or rent agreements.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: Produce All federal and state tax returns filed by King Smokers LLC during the Relevant Period.

RESPONSE:

HEREOF FAIL NOT UNDER PENALTY OF LAW.

Dated at Hartford, Connecticut, this 27th day of March, 2026.



BRYAN CAFFERELLI
COMMISSIONER OF CONSUMER PROTECTION