

DOCKET NO.

RETURN DATE:	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT	:	JUDICIAL DISTRICT
<i>Plaintiff</i>	:	OF HARTFORD
	:	
V.	:	
	:	
CODY ROBERTS	:	
and JOSEPH R. ACCETTULLO,	:	
(dba HIGH BAZAAR)	:	
<i>Defendants</i>	:	JANUARY 19, 2024

**APPLICATION FOR *EX PARTE* TEMPORARY INJUNCTION**

Pursuant to Connecticut General Statutes §§ 42-110m and 52-471 et seq., Plaintiff, the State of Connecticut (“Plaintiff” or the “State”) represented by William Tong, Attorney General, at the request of Bryan Cafferelli, the Commissioner of Consumer Protection, hereby makes application for an immediate *Ex Parte* Temporary Injunction from the Defendants, Cody Roberts, Joseph R. Accettullo, and their affiliates, subsidiaries, and related entities including but not limited to HighBazaar (collectively, the “Defendants”).

**I. BACKGROUND**

1. Since at least January 30, 2022, the Defendants have organized, advertised, and promoted a series of events called HighBazaar that involve the sale of cannabis to the public without holding a license as a cannabis establishment from the Department of Consumer Protection, in violation of the Responsible and Equitable Regulation of Adult-Use Cannabis Act (hereinafter “RERACA”), Conn. Gen. Stat. § 21a-420 *et seq.* and the Connecticut Unfair Trade Practices Act (hereinafter “CUTPA”), Conn. Gen. Stat. § 42-110a, *et seq.*

Such conduct represents a substantial public safety risk to Connecticut consumers.

2. The Defendants rent space at various locations in Hamden, CT, and charge vendors a fee to sell various cannabis products, without a license to sell cannabis, to Connecticut consumers at events the Defendants advertise and promote on social media sites and the online ticketing platform Eventbrite.
3. The HighBazaar events have continued despite a January 4, 2024, letter from the Attorney General advising the Defendants that the events may violate Connecticut law. *See Ribeiro Affidavit, Exhibit E.*
4. The Defendants' acts and practices as alleged in paragraph 3 violate the following public policies: the public policy prohibiting the unlicensed sale of cannabis, as embodied by RERACA, and the public policy requiring cannabis products adhere to the strict safety standards as embodied by RERACA and the Adult-Use Cannabis Policies and Procedures (hereinafter, the "Cannabis Policies and Procedures"), §§ 21a-421j-1 through 21a-421j-40.
5. The Defendants' course of wrongful conduct as alleged herein is unethical, immoral, oppressive, and unscrupulous.
6. The Defendants' course of wrongful conduct as alleged herein caused substantial injury to consumers and others, which could not have been reasonably avoided and which produced no countervailing benefits.
7. The Defendants' acts and practices as alleged herein therefore constitute deceptive or unfair acts or practices in violation of Conn. Gen. Stat. § 42-110b(a).

8. As a result of Defendants' actions, Connecticut consumers have been harmed by the Defendants' organizing and operating illicit, unlicensed cannabis markets in blatant violation of RERACA and the Cannabis Policies and Procedures promulgated thereunder.
9. The Defendants' continuing acts and practices of knowingly organizing and operating an illicit, unlicensed cannabis market in violation of Conn. Gen. Stat. § 21a-420 *et seq.*, the Cannabis Policies and Procedures promulgated thereunder, and CUTPA, raise concerns that the Defendants will continue to cause further harm.

## II. **TEMPORARY INJUNCTION**

1. The potential for consumer harm in this case is real, as evidenced by the affidavit of the Connecticut Office of the Attorney General's Legal Investigator ("the Investigator") that based on the facts set forth, these cannabis products are being sold outside of the regulated market, are untested, and are sold in a space that is not age gated. See Caylee Ribeiro's Affidavit.
2. Connecticut consumers are put at substantial risk by the Defendants' continuing conduct in knowingly organizing and operating an illicit, unlicensed cannabis market in violation of CUTPA, the public policies set forth in RERACA, and the Cannabis Policies and Procedures promulgated thereunder which necessitates the granting of this Application for an *Ex Parte* Temporary Injunction.
3. The State is seeking to protect the public health of Connecticut consumers by preventing the Defendants from engaging in conduct violative of CUTPA.

4. The affidavit attached clearly shows that irreparable loss or damage will result to the State before the matter can be heard on notice and annexed hereto and made a part hereof.

**III. NOTICE TO INTERESTED PARTIES**

Pursuant to Connecticut Practice Book § 4-5, Plaintiff represents that, on January 18, 2024, the undersigned caused to be hand delivered to the Defendants copies of these papers for this Application for *Ex Parte* Temporary Injunction with the date, time, and place at which the Plaintiff would be presenting this Application to the Court. See Exhibit 1. The marshal confirmed on that same date, via email, that the papers were delivered to the Defendants. See Exhibit 2. Furthermore, as indicated in the attached screenshot, the Defendants represented in a posting on social media that the event scheduled for Sunday, January 21, would be cancelled, presumably in response to their receipt of the papers. See Exhibit 3.

WHEREFORE, due to the circumstances presented in this case, namely the Defendants' continuing conduct in knowingly organizing and operating an illicit, unlicensed cannabis market in violation of CUTPA, the public policies set forth in RERACA, and the Cannabis Policies and Procedures promulgated thereunder, the State respectfully requests that the Court issue an *Ex Parte* Temporary Injunction in substantially the form attached hereto.

Respectfully submitted,

PLAINTIFF  
STATE OF CONNECTICUT

WILLIAM TONG  
ATTORNEY GENERAL

/s/ Jonathan J. Blake, Juris No. 426816

Jonathan J. Blake, Juris No. 426816

Addison S. Keilty, Juris No. 444782

Michael Nunes, Juris No. 444379

Assistant Attorneys General

Office of the Attorney General

165 Capitol Avenue

Hartford, CT 06106

Phone: 860-808-5400

Fax: 808-808-5593

[Addison.Keilty@ct.gov](mailto:Addison.Keilty@ct.gov)

[Michael.Nunes@ct.gov](mailto:Michael.Nunes@ct.gov)

[Jonathan.Blake@ct.gov](mailto:Jonathan.Blake@ct.gov)

# EXHIBIT 1



OFFICE OF THE ATTORNEY GENERAL  
CONNECTICUT

JONATHAN J. BLAKE  
ASSISTANT ATTORNEY GENERAL

Phone: +1 860-808-5400

January 18, 2024

**By Select Delivery Method**

CODY ROBERTS  
10 Tibbets Road  
Seymour, CT 06483-2221

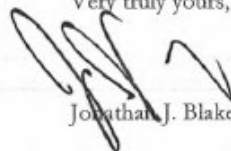
JOSEPH R. ACCETTULLO  
70 Clover Circle  
Hamden, CT 06514-2602

Re: *State of Connecticut v. Cody Roberts and Joseph Accettullo*

Dear Mr. Roberts and Mr. Accettullo:

I am writing pursuant to Section 4-5 of the Practice Book to notify you that the Attorney General intends to file the attached application for an immediate temporary injunction tomorrow morning, January 19, 2024, at 11:00 a.m. in the Hartford Superior Court, 95 Washington Street, Hartford, Connecticut, against you personally for violations as set forth in the attached Complaint.

Very truly yours,



Jonathan J. Blake

165 Capitol Avenue  
Hartford, Connecticut 06106

*An Affirmative Action/Equal Opportunity Employer*

# EXHIBIT 2



## FW: High Bazaar Application for TI.pdf



Blake, Jonathan

To ● Keilty, Addison; ● Nunes, Michael



9:26 AM

**From:** Brian Mezick <[statemarshal@mezick.com](mailto:statemarshal@mezick.com)>

**Sent:** Thursday, January 18, 2024 7:45 PM

**To:** Viera, Diana <[Diana.Viera@ct.gov](mailto:Diana.Viera@ct.gov)>

**Cc:** Blake, Jonathan <[Jonathan.Blake@ct.gov](mailto:Jonathan.Blake@ct.gov)>

**Subject:** Re: High Bazaar Application for TI.pdf

You don't often get email from [statemarshal@mezick.com](mailto:statemarshal@mezick.com). [Learn why this is important](#)

**EXTERNAL EMAIL:** This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Diana- these were served this evening. I had to ask the other marshal in my office, Madison Beggs to serve this. He will email you a return of service tomorrow morning.

Was not a fun last minute service. Everything is iced over tonight and Beggs got stuck in the defendants driveway in Seymour for an hour and as they pushed his car out in the dark!!

Get [Outlook for iOS](#)

# EXHIBIT 3



highbazaar.ct 6h



Tong decided to rob patients access of quality affordable medicine to force them to go to his homies at the shitty dispensaries this state has to offer!!

Sorry but this weekend is cancelled feel free to tell him why your mad!

SECRET L

**HIGH BAZAAR VS TONG**

**SUN JAN 21**

MAIN EVENT!  
15 ROUNDS!  
WATCH LIVE!  
THIS WILL NOT BE TELEVISED!

**BE RINGSIDE FOR THE GREATEST FIGHT IN HISTORY**

The poster features a colorful, abstract background with a yellow figure in the center. The text is arranged in a dynamic, overlapping layout with various fonts and colors.



highbazaar.ct 7h  
From Create Mode >



Better yet!!! Stay Tuned for the  
Next Meet up where we can  
Organize and Vote this dude and  
his cronies Out Of Office!!!!

DOCKET NO.	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT	:	JUDICIAL DISTRICT
<i>Plaintiff</i>	:	AT HARTFORD
	:	
V.	:	
	:	
CODY ROBERTS	:	
and JOSEPH R. ACCETTULLO	:	
(dba HIGH BAZAAR),	:	
<i>Defendants</i>	:	January 19, 2024

**(PROPOSED) ORDER OF EX PARTE TEMPORARY INJUNCTION**

The Plaintiff's Application for *Ex Parte* Temporary Injunction having been presented to the Court, and having examined the Plaintiff's Complaint, Application, and supporting Affidavit, the Court hereby enters the following ORDER against the Defendants, Cody Roberts and Joseph R. Accettullo, and their affiliates, subsidiaries, and related entities including but not limited to HighBazaar (collectively, the "Defendants"):

**Temporary Injunction**

1. Pursuant to General Statutes § 52-471 *et seq.*, the Defendants, as well as their representatives, agents, employees, and all other persons acting in concert with or on behalf of them, are hereby restrained by this Court, until the date of any show cause hearing on this Application, and such time thereafter as the Court shall Order, from directly or indirectly:
  - a. Violating CUTPA;
  - b. Violating any provision of RERACA or the Cannabis Policies and Procedures promulgated thereunder;

- c. Organizing, operating, promoting, or advertising events where the unlicensed sale of cannabis occurs;
- d. Representing to the public, either orally or in writing, that the operation of any such events organized or operated by the Defendants are legal pursuant to RERACA or any other federal or state laws; and
- e. Taking any action that would undermine the implementation of any part of this Order.

**SO ORDERED**

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Date

---

Judge of the Superior Court

DOCKET NO

SUPERIOR COURT

STATE OF CONNECTICUT  
*Plaintiff*

JUDICIAL DISTRICT  
AT HARTFORD

V

CODY ROBERTS  
and JOSEPH R ACCETTULLO  
(dba HIGH BAZAAR),  
*Defendants*

January 19, 2024

**SUMMONS**

TO ANY PROPER OFFICER

BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to summon the Defendants, JOSEPH R ACCETTULLO, 70 Clover Cir , Hamden, CT 06514-2602 and CODY ROBERTS, 10 Tibbets Road, Seymour, CT 06483-2221, to appear before the Superior Court for the Judicial District of Hartford, 95 Washington Street Hartford, CT 06103, at the place and time specified in the accompanying Order to Show Cause, then and there to show cause why the temporary injunction should not be continued against them as prayed for in the accompanying verified Complaint, Application for Ex Parte Temporary Injunction and as set forth in the accompanying Order of Temporary Injunction, and proceedings thereon, by serving in a manner provided by statute for the service of process a true and attested copy of this Writ and the accompanying verified Complaint, Application for Ex Parte Temporary Injunction, Affidavit of Legal Investigator Caylee Ribeiro, Order of Temporary Injunction, and Order to Show Cause and proceedings had thereon, on the defendants on or before \_\_\_\_\_, 2024

HEREOF FAIL NOT, BUT DUE SERVICE AND RETURN MAKE

Dated at Hartford, Connecticut this 19 day of January, 2024

A handwritten signature in black ink, consisting of several stylized, overlapping loops and curves, positioned above a horizontal line.

---

Jonathan J. Blake  
Commissioner of the Superior Court



DOCKET NO

SUPERIOR COURT

STATE OF CONNECTICUT  
*Plaintiff*

JUDICIAL DISTRICT  
AT HARTFORD

V

CODY ROBERTS  
and JOSEPH R ACCETTULLO  
(dba HIGH BAZAAR),  
*Defendants*

January 19, 2024

**ORDER TO SHOW CAUSE**

WHEREAS, the foregoing Application for Temporary Injunction, duly verified, has been presented to the Court and

WHEREAS, an Order granting the Temporary Injunction *ex parte* has been issued by the Court, and directing the Defendants, Cody Roberts, and Joseph R Accettullo, and their affiliates, subsidiaries, and related entities including but not limited to HighBazaar (collectively, the "Defendants) to show cause why a Temporary Injunction should not continue as ordered by the Court,

NOW THEREFORE, it is ORDERED that the Defendants be summoned to appear before the Superior Court for the Judicial District of Hartford in

\_\_\_\_\_ at 95 Washington Street, Hartford, Connecticut, on the \_\_\_\_ day of \_\_\_\_\_, 2024, at \_\_\_\_\_, then and there to show cause why a Temporary Injunction should not continue

Service to be made upon the Defendants on or before the \_\_\_\_ day of \_\_\_\_\_, 2024

\_\_\_\_\_

Date

\_\_\_\_\_

Clerk/Judge

DOCKET NO

SUPERIOR COURT

STATE OF CONNECTICUT  
*Plaintiff*

JUDICIAL DISTRICT  
AT HARTFORD

v

JOSEPH ACCE TULLO and  
CODY ROBERTS,  
(hba HIGHBAZAAR)  
*Defendants*

JANUARY 19, 2024

**AFFIDAVIT OF LEGAL INVESTIGATOR CAYLEE RIBEIRO IN SUPPORT OF EX  
PARTE TEMPORARY INJUNCTION**

STATE OF CONNECTICUT            )  
  ) ss Hartford  
COUNTY OF HARTFORD            )  
  )  
**AFFIDAVIT**

**CAYLEE RIBEIRO**, Legal Investigator for the State of Connecticut, Office of the Attorney General, the undersigned, does hereby depose and swear

- 1 I am over eighteen years of age
- 2 I believe in the obligations of an oath
- 3 As part of the duties of my employment, I am responsible for investigating potentially unfair or deceptive trade practices by businesses and individuals within the State of Connecticut
- 4 Previous to being employed by the State of Connecticut I had been employed as a police officer as well as a police sergeant for a total of 10 years

- 5 During the course of my duties, I have had occasion to investigate and become acquainted with the following events and subsequent actions of the defendants Joseph Accettullo and Cody Roberts (the "Defendants")
- 6 Since approximately 2021, the Defendants have organized, advertised, and promoted a series of events under the names "HighBazaar" or "High Bazaar" (hereinafter referred to as "HighBazaar") that involve the sale of which was represented to be cannabis to the public without holding a license as a cannabis establishment from the Connecticut Department of Consumer Protection, in violation of the Responsible and Equitable Regulation of Adult-Use Cannabis ("RERACA"), Conn Gen Stat § 21a-420, *et seq*
- 7 As detailed below, the Defendants rent space at various locations in Hamden, CT, and charge vendors a fee to sell what was represented to be various cannabis products at events they advertise and promote on social media and the ticketing platform Eventbrite These events have continued despite a letter from the Attorney General advising the Defendants that the events may violate Connecticut law
- 8 I first became aware of the Defendants when our agency received consumer complaints regarding the HighBazaar events
- 9 On January 30, 2022, I made an unannounced visit to a HighBazaar event located at 295 Treadwell Street, Hamden I was not asked for identification or otherwise asked to verify my age before I entered Inside the facility I observed individuals sitting on couches smoking, and through my law

enforcement training I determined from the odor that the individuals were smoking cannabis

10 In a second room, I observed five vendors selling various products purporting to be cannabis, including flower (or "buds"), baked goods, and gummies. The vendors displayed the flower in mason jars identifying the various flavors and strains of what the vendors purported to be cannabis. Based on my training and experience I was able to determine the flower offered for sale by vendors was cannabis. I also observed scales that were used to weigh the cannabis flower offered for purchase.

11 I purchased a package of gummy bears from a vendor calling itself Truu Tree, for a "donation" of \$15.00. This item was labelled "True Tree #81, Gummy 400 mg, 40mg per pc." I purchased another product, a "rice crispy treat" from a business calling itself Cutthroats. The donation was \$10.00. There was no label on this item. Photographs of these items are attached hereto as Exhibit A.

12 Several of the products I observed purported to contain in excess of 100 mg of THC per package.

13 On or about February 10, 2022, I learned that a court had entered a temporary ex parte injunction ordering defendant Accettullo to cease operating a cannabis bazaar at the property located at 18 Crest Way, Hamden. See judicial docket, *Masi v Accettullo, et al*, docket number NNH CV22-5052795S docket entry 100.33. The court entered a subsequent order prohibiting Accettullo from holding any events at either 18 Crest Way or 295

Treadwell Street without obtaining approvals from various Town of Hamden officials *Id* , docket entry nos 123 00 and 123 10

- 14 In or about February 2022, I observed on Instagram several advertisements for HighBazaar events to take place in February 2022. Photographs of these advertisements are attached hereto as Exhibit B.
- 15 On or about February 12, 2022, I made another unannounced visit to a HighBazaar event located at 295 Treadwell Street, Hamden, CT. Before entering the HighBazaar event, I observed approximately 100 individuals waiting to enter. I observed six security guards outside the HighBazaar event, and I was asked to provide identification, and one of the security guards used a wand to check that I was not carrying a weapon before entering.
- 16 I observed about sixty vendors inside the HighBazaar event. All vendors were selling what was represented as cannabis flower, cannabis-infused baked goods, and other cannabis-infused edibles. I observed scales that were used to weigh the flower. Based on my training and experience I was able to determine the flower offered for sale by vendors was cannabis. All purchases of cannabis were based on "donations" ranging from \$10 to \$40 per item. Cannabis flower was being sold for donations between \$28 to \$100 an ounce. The flower, represented to be cannabis, was displayed in mason jars identifying the strain and flavor of the cannabis flower.
- 17 Many vendors were giving away free samples of edibles purporting to contain THC. I observed vendors selling items purporting to contain THC in the form of lollipops, gummy bears, nerd ropes, gummy worms, cookies, and rice.

crispy treats I observed one vendor selling candy bars with the following labels M&M, Sour Patch Kids, Crunch Bars, and images pulled from the cartoon movie Space Jam, all purporting to contain THC

- 18 In or about October 2023, I learned that the Defendants were again organizing, advertising, and promoting HighBazaar events, this time located at the Masonic Temple Lodge located at 3732 Whitney Avenue, Hamden
- 19 I took a screenshot of an advertisement on Instagram promoting an event on November 8, 2023, advertised as "Humpday Shakedown " A copy of the screenshot is attached hereto as Exhibit C
- 20 On November 8, 2023, I made an unannounced visit to the HighBazaar event I obtained a ticket to the event, free of charge, from the event ticketing site Eventbrite I obtained a ticket without verifying my age as over 21 and when I showed up at the event, I was not required to show identification to verify my age
- 21 There were approximately 14-16 vendors offering for sale gummies that were purported to contain THC and vendors also displayed mason jars filled with a green, leafy substance that vendors purported to be cannabis flower Based on my training and experience I was able to determine the flower offered for sale by vendors was cannabis I observed vendors using scales to weigh the flower and packing supplies I purchased what a vendor named Creamery Station purported to be an eighth of an ounce of cannabis and two packages of THC gummies from a vendor called The Glue Factory Delivery Service A

photograph of the THC gummies from my November 8, 2023, visit is attached hereto as Exhibit D

22 On November 20, 2023, I transmitted one eighth of an ounce of cannabis that I purchased at the HighBazaar on November 8, 2023, to the Connecticut Agricultural Experiment Station to test the THC level of the product. The analysis of the product was completed on January 3, 2024. The test results, attached as Exhibit E, reveal the product far exceeded a total THC level of 3 percent on a dry weight basis, which would classify the products as cannabis under Conn. Gen. Stat. § 21a-420(3).

23 The Defendants do not hold a cannabis establishment license with the Department of Consumer Protection that would permit them to legally offer cannabis for sale as part of the adult-use cannabis marketplace.

24 The Defendants' conduct, therefore, violates Conn. Gen. Stat. § 21a-420c, which provides that no person may sell or offer cannabis to a consumer without holding the appropriate cannabis establishment license from the Department of Consumer Protection.

25 On January 4, 2024, Attorney General William Tong sent the Defendants a letter requesting that the Defendants immediately cease advertising, promoting, and organizing HighBazaar events that allow for the unlicensed sale of cannabis to consumers. A copy of the letter is attached hereto as Exhibit F.

26 Although the Defendants posted a message on social media that they would cancel their next HighBazaar event due to the Attorney General's letter, I



learned that they relocated the High Bazaar events to another space, a strip mall located at 3417 Whitney Avenue, Hamden, CT

27 On January 13, 2024, I made an unannounced visit to 3417 Whitney Avenue, Hamden for another HighBazaar event See Exhibit H

28 As was the case previously, I obtained a ticket free of charge from the Eventbrite ticketing platform A security guard checked my person for weapons and asked for my identification at the door Mr Accettullo, whom I recognized from previous visits, asked me to sign in on a sheet of paper on a clipboard asking for my name, email address, and phone number Mr Accettullo asked that I be discrete with my purchases obtained from the HighBazaar event when I left the building

29 I observed approximately ten different vendors selling gummies purported to contain THC, hashish, along with a green flaky substance

30 All ten vendors indicated that the vendors were selling different strains of cannabis flower, among other THC products Based on my training and experience I was able to determine the flower offered for sale by vendors was cannabis All vendors at the HighBazaar event were equipped with a scale and packaging supplies I also observed vendors displaying the cannabis flower in separate mason jars One vendor was displaying cannabis flower in stainless steel pots

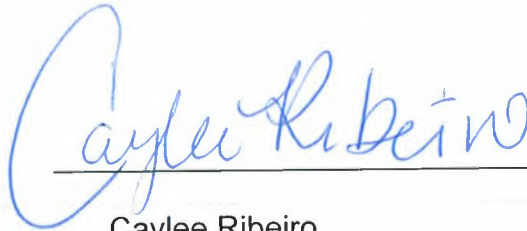
31 I purchased an eighth of an ounce of cannabis from a vendor by the name of The Glue Co The vendor placed the cannabis flower in a clear zip lock bag and the vendor then wrote the word "Berry Snow" On the zip lock bag The

product was then placed in a brown paper bag. The purchase was \$35.00.

Once I purchased the product, I left the premises.

32. On or about January 16, 2024, I printed a screenshot advertising a HighBazaar event scheduled for Sunday, January 22, 2024. The advertisement does not disclose the location of the event. A copy of the screenshots are attached hereto as Exhibit G.

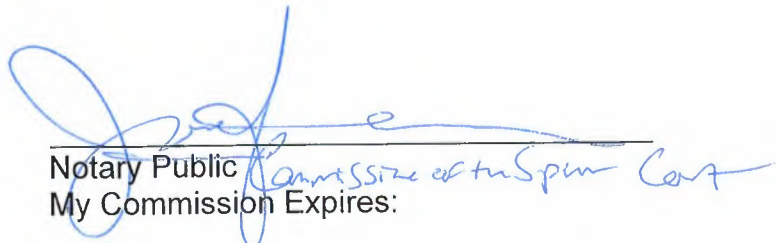
Further, deponent sayeth not.



Caylee Ribeiro  
Legal Investigator,  
Office of the Attorney General

STATE OF CONNECTICUT            )  
  ) ss: Hartford  
COUNTY OF HARTFORD         )

Before me personally appeared Caylee Ribeiro, Legal Investigator, State of Connecticut Office of the Attorney General, who made oath to the truth of the allegations in this Affidavit. Subscribed and sworn to before me, this 18<sup>th</sup> day of January, 2024.



Notary Public  
My Commission Expires:

# EXHIBIT A



# EXHIBIT B

11:09

5G+



HIGHBAZAAR.CT  
Posts



highbazaar.ct



99 likes  
View all 7 comments  
February 14, 2022



highbazaar.ct





11:09

5G+

HIGHBAZAAR.CT  
Posts



47 likes

View 1 comment

February 12, 2022



highbazaar.ct





highbazaar.ct



98 likes

highbazaar.ct 21 Years or Older

Veterans and Medical Patients Always Free... more

View all 12 comments

February 15, 2022



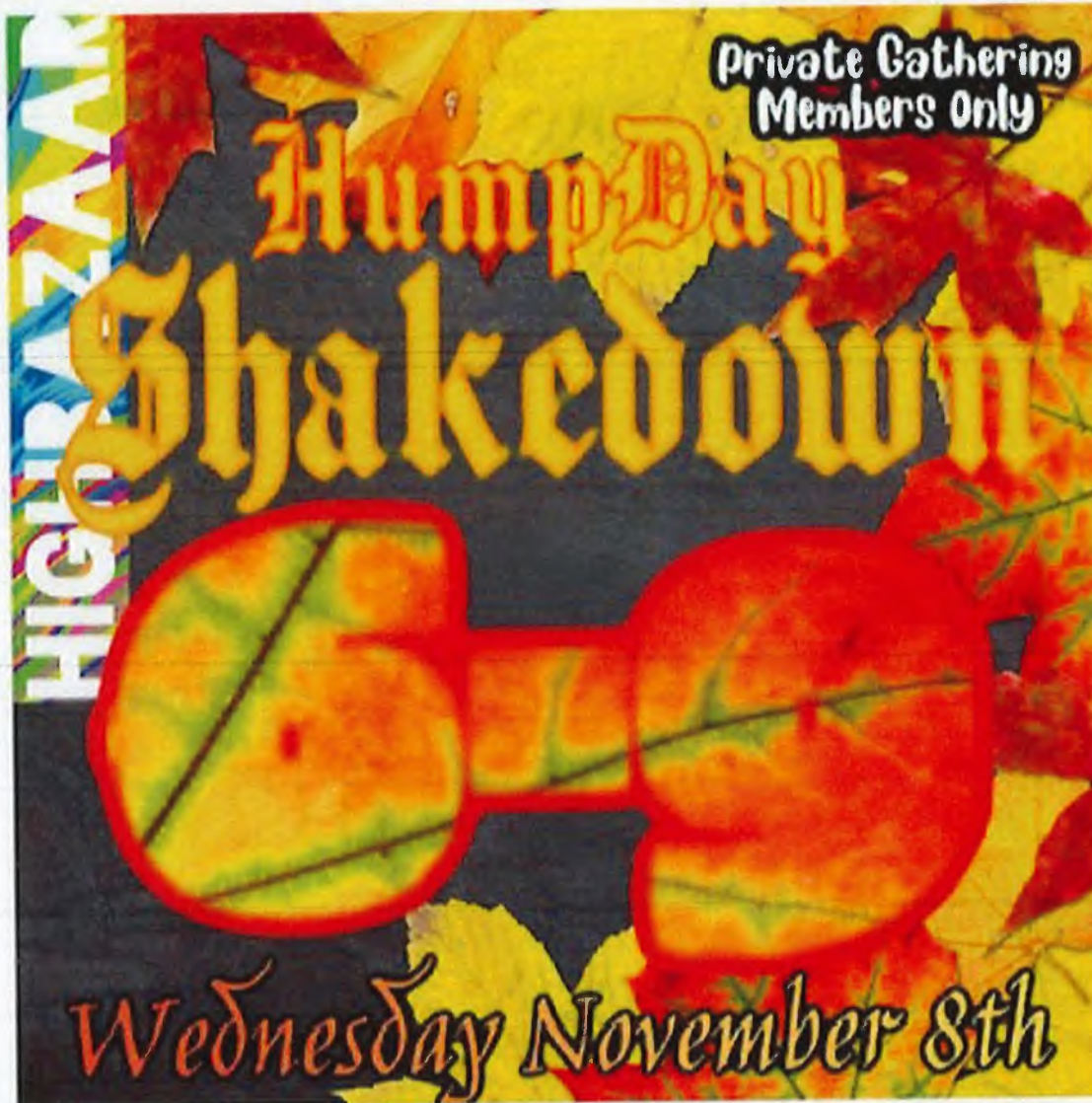
highbazaar.ct







# EXHIBIT C

## HighBazaar Present's "Humpday Shakedown"



 3 x Tickets  
Order total: Free

 Wednesday, November 8, 2023 from 6:00 PM to 9:00 PM (ET)  
Add to [Google](#) · [Outlook](#) · [iCal](#) · [Yahoo](#)

 3732 Whitney Avenue  
3732 Whitney Avenue  
Hamden, CT 06518

# EXHIBIT D



# EXHIBIT E





The Connecticut Agricultural Experiment Station

Title: Test Report#23.8081

Department of Analytical Chemistry

123 Huntington Street

New Haven, Connecticut 06511

(Data provided by customer are indicated in *italic font*)

Final Report to: *Department of Consumer Protection*

Agency Division: *Drug Control Division*

Sample was delivered by: *Thomas Baron*

Sample Received : 20-Nov-23

Analysis Completed : 03-Jan-24

Sample Number: *8421*

Sample Type: *Adult Use Marijuana*

Description: *Apples to Oranges (sativa) flower #1*

*Business: Caylee Ribeiro (CT State's Attorney General's Office)  
165 Capitol Ave, Hartford*

*CT 06106*

*The sample consisted of dried flower.*

Analysis Requirement : *Cannabinoids*

Test Method: GC-FID

Results:

Analyte Found	Amount	Unit	Comment
Total delta-9 THC	= 15.6	%	
Total CBD	< 0.1	%	

Sample Number: 8421

The sample exceeds 0.3% THC on a dry weight basis.

01/03/2024

Christian (Chris) O. Dimlpa  
Head and Chief Scientist, Department of Analytical Chemistry  
(Report is not valid unless signed, and report issued date is next to signature)

Signature indicates end of sample 8421 report.

The results listed in this report pertain only to the samples as provided to the lab by the customer.

# EXHIBIT F



OFFICE OF THE ATTORNEY GENERAL  
CONNECTICUT

WILLIAM TONG  
ATTORNEY GENERAL

January 4, 2024

**By Certified Mail**

Joseph R. Accettullo  
Cody Roberts  
J&C Productions LLC  
295 Treadwell Street  
Hamden, Connecticut 06514

Re: *HighBazaar Cannabis Events*

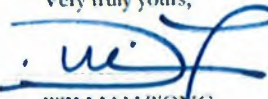
Dear Misters Accettullo and Roberts:

Our Office has become aware that you are involved in organizing recurring, unlicensed cannabis markets under the name HighBazaar held at the Masonic Temple Day Spring Lodge in Hamden, Connecticut. It appears that these events involve the illegal marketing and sale of cannabis outside of the regulated market and that the events are accessible to individuals under the age of 21. These events appear to violate the Connecticut Unfair Trade Practices Act ("CUTPA"), General Statutes § 42-110a, *et seq.*, the Responsible and Equitable Regulation of Adult-Use Cannabis Act, General Statutes § 21a-420, *et seq.*, and/or other applicable laws and regulations.

We request that you cease holding these events immediately. If you do not do so, our office will explore all legal options. Please provide a response to this letter to Assistant Attorney General Jon Blake at [jonathan.blake@ct.gov](mailto:jonathan.blake@ct.gov).

Thank you for your prompt attention.

Very truly yours,



WILLIAM TONG

165 Capitol Avenue  
Hartford, Connecticut 06106

*An Affirmative Action/Equal Opportunity Employer*



# EXHIBIT G

8:26



highbazaar.ct



**SECRET LOCATION IN HAMDEN - NO NEWS ALLOWED!!**

**HIGH BAZAAR VS TONG**

COLLECTING FOOD DONATIONS FOR THE ALICE CENTER FOOD BANK

**SUN JAN 21**

**MAIN EVENT!  
15 ROUNDS!  
DRUG WAR 2.0!  
THIS WILL NOT BE TELEVISED!**

**BE RINGSIDE FOR THE GREATEST FIGHT IN HISTORY**



258 likes

highbazaar.ct Get ready a Nutmeg showdown for the Ages! AG Tong, throwing corporate Russian... more

View all 17 comments

4:59



highbazaar.ct 2h



RETURN OF THE  
HIGHBAZAAR

JANUARY 21ST

Send message



# EXHIBIT H



driphausct

**Mini**  
**Saturday**  
**5-8PM 420/710/BAZAAR VIBES**  
**SATURDAY JANUARY 13TH**  
**21+ MEMBERS ONLY**

@driphausct and @supportyourlocal710

DOCKET NUMBER

RETURN DATE FEBRUARY 13, 2024

STATE OF CONNECTICUT,  
Plaintiff

SUPERIOR COURT

v

JUDICIAL DISTRICT  
OF HARTFORD

JOSEPH R ACCELTULLO,  
and CODY ROBERTS,  
(dba HIGH BAZAAR)  
Defendants

JANUARY 19, 2024

## **COMPLAINT**

### **I. INTRODUCTION**

1 This is an action pursuant to the Connecticut Unfair Trade Practices Act ("CUTPA"), Chapter 735a of the Connecticut General Statutes (Conn Gen Stat. § 42-110m), which alleges unfair or deceptive acts and practices that violate Conn Gen Stat § 42-110b. This action seeks to secure injunctive relief against the defendants, to obtain relief as is necessary to redress injury to consumers resulting from the defendants' violations of law, to obtain appropriate equitable relief, for civil penalties, and other appropriate relief.

### **II. PARTIES**

2 The Plaintiff is the State of Connecticut, represented by William Tong, Attorney General of the State of Connecticut, acting at the request of Bryan Cafferelli, the Commissioner of Consumer Protection, pursuant to Conn Gen Stat § 42-110m(a).

3 The defendant Joseph R Accettullo resides at 70 Clover Cir , Hamden, CT 06514-2602, and has organized, advertised, and promoted a series of events under



the names "HighBazaar" or "High Bazaar" (hereinafter referred to as "HighBazaar") At all relevant times hereto and upon information and belief, Joseph R Accettullo directed, controlled, and/or participated in the acts and practices of the HighBazaar, including the acts and practices set forth herein

4 The defendant Cody Roberts resides at 10 Tibbets Rd , Seymour, CT 06483-2221, and has organized, advertised, and promoted a series of events under the names "HighBazaar" or "High Bazaar" (hereinafter referred to as "HighBazaar") At all relevant times hereto and upon information and belief, Cody Roberts directed, controlled, and/or participated in the acts and practices of the HighBazaar, including the acts and practices set forth herein

5 Whenever reference is made in this complaint to any act or practice of Joseph R Accettullo, Cody Roberts, and HighBazaar (collectively referred to herein as the "Defendants"), such allegation shall be deemed to mean that the principals, officers, directors, employees, agents, and representatives of the Defendants did, or authorized, such act or practice, on behalf of the Defendants while actively engaged in the scope of their duties

### **III. JURISDICTION**

6 The Defendants have engaged in the conduct described below in the State of Connecticut This Court has jurisdiction over this matter pursuant to CUTPA

### **IV. VENUE**

7 Venue is proper in the Superior Court for the judicial district of Hartford

pursuant to Conn Gen Stat § 42-110d

## V. FACTUAL ALLEGATIONS

### A. The Responsible and Equitable Regulation of Adult-Use Cannabis Act ("RERACA")

8 In 2021, Connecticut enacted the Responsible and Equitable Regulation of Adult-Use Cannabis Act ("RERACA"), Public Act 21-1, as amended by Public Act 23-79, Conn Gen Stat § 21a-420 *et seq*, creating a legal, regulated market for the sale of adult-use cannabis

9 The Department of Consumer Protection (the "Department") maintains jurisdiction over the adult-use cannabis market and issues licenses to cannabis establishments, as defined by Conn Gen Stat § 21a-420(4)

10 Under RERACA, only cannabis establishments licensed by the Department are permitted to sell cannabis products RERACA prohibits any person from acting as a retailer or representing that such person is a retailer unless such person has obtained a license from the Department Conn Gen Stat § 21a-420r(a)

11 Among other things, RERACA defines products as cannabis if the product exceeds 0.3 percent total THC on a dry weight basis Conn Gen Stat § 21a-420(3), Conn Gen Stat § 21a-240(29)

12 Pursuant to their authority under Conn Gen Stat § 21a-421k to establish policies and procedures to protect the public health and safety under RERACA, the Department Commissioner issued extensive record-keeping, inventory control,



advertising, packaging, and testing and safety standards governing the operations of producers, cultivators, product manufacturers, food and beverage manufacturers, and product packagers with respect to adult-use cannabis. See Adult-Use Cannabis Policies and Procedures (hereinafter, the "Cannabis Policies and Procedures"), §§ 21a-421j-1 through 21a-421j-40

13 The Cannabis Policies and Procedures require, *inter alia*, laboratory testing of cannabis products to ensure that the products do not contain harmful adulterants, such as heavy metals, pesticides, and biological contaminants. See § 21a-421j-30

14 The Cannabis Policies and Procedures include the following packaging requirements

- a The standard serving of an edible cannabis product shall contain not more than five milligrams of total THC,
- b Each single standardized serving of an edible cannabis product in a multiple-serving package shall be physically demarcated and readily separable in a way that enables a reasonable person to easily determine
  - i how much of the edible cannabis product constitutes a single standardized serving, and
  - ii the maximum possible amount of total THC contained in the entire package, provided that if such demarcation and separation is impracticable, then the entire package shall contain not more than five milligrams of total THC,
- c A multiple-serving package of an edible cannabis product shall contain not more than one hundred milligrams of total THC,
- d Packaging shall be child-resistant, tamper-resistant and light-resistant,

- e Packaging for cannabis intended for multiple-serving use shall be resealable in such a manner that is continuously child-resistant and preserves the integrity its contents,
- f Packaging shall be entirely and uniformly white, and shall not incorporate any information, print, embossing, debossing, graphic or hidden feature, other than labeling required,
- g Packaging shall not be visually similar to (A) any commercially similar product that does not contain cannabis, or (B) packaging used for any good that is marketed to an audience reasonably expected to be under twenty-one years of age § 21a-421j-32

15 The Cannabis Policies and Procedures also require that cannabis products contain the following on their labels

- a A unique identifier generated by the Cannabis Analytic Tracking System,
- b The following warning statement outlined by a red box **“This product is not FDA- approved, may be intoxicating, cause long-term physical and mental health problems, and have delayed side effects. It is illegal to operate a vehicle or machinery under the influence of cannabis. Keep away from children.”** and at least one of the following warning statements
  - i Warning Frequent and prolonged use of cannabis can contribute to mental health problems over time, including anxiety, depression, stunted brain development and impaired memory,
  - ii Warning Consumption while pregnant or breastfeeding may be harmful,
  - iii Warning Cannabis has intoxicating effects and may be habit forming and addictive,
  - iv Warning Consuming more than the recommended amount may result in adverse effects requiring medical attention,

- c. The following unobscured graphics, each in a size not less than one-half inch by one-half inch, which graphics shall not be used for any purpose other than as contemplated herein:



- d. The following symbol issued by the department that indicates the package is not safe or legal for individuals under twenty-one years of age;



- e. A cannabis package may be labeled with a picture of the cannabis, such picture shall (1) clearly depict the size, shape and color of the cannabis, (2) not to obscure or overlap with any information required by section 21a-421j-33 of these Policies and Procedures, and (3) not exceed twenty-five per cent of the surface of the cannabis package; and
- f. No label shall appeal to persons under the age of twenty-one.

§ 21a-421j-33.

16. RERACA prohibits cannabis establishments from advertising cannabis or cannabis products in a manner that appeals to individuals under twenty-one years of age.

See Conn. Gen. Stat. § 21a-421 bb(b).

17. The purpose of these requirements and prohibitions is to: ensure that cannabis sold through the regulated market is safe; provide accurate disclosures to Connecticut consumers concerning the ingredients, effects, and risks of consuming

cannabis, provide accurate information to Connecticut consumers regarding the THC levels of the cannabis products they may purchase, and prevent the marketing, advertising, and sale of cannabis to minors

**B. Defendants' Course of Conduct**

18 Since at least January 30, 2022, the Defendants have organized, advertised, and promoted a series of events called HighBazaar that involve the sale of which the Defendants represent to be cannabis to the public without holding a license as a cannabis establishment from the Department, in violation of RERACA

19 The Defendants rent space at various locations in Hamden, CT, and charge vendors a fee to sell what the Defendants represent to be various cannabis products at events they advertise and promote on social media sites and the ticketing platform Eventbrite

20 The HighBazaar events have continued despite a January 4, 2024, letter from the Attorney General advising the Defendants that the events may violate Connecticut law *See Ribeiro Affidavit Exhibit F*

21 As a result of consumer complaints to the Connecticut Attorney General's Office concerning HighBazaar events, on January 30, 2022, a legal investigator from the Connecticut Attorney General's Office (the "Investigator") made an unannounced visit to a HighBazaar event located at 295 Treadwell Street, Hamden, CT, and purchased what Defendants represented to be cannabis products

22 On the aforementioned date, the Defendants did not ask for the

Investigator's identification or otherwise request verification of the Investigator's age before entering the HighBazaar event, nor did the Investigator observe the Defendants requesting identification from any other individuals entering the venue

23 On the aforementioned date, the Investigator observed approximately five vendors within the HighBazaar event offering for sale products purporting to be cannabis. All vendors were equipped with a scale and packaging supplies. None of the vendors had packaging for its purchased cannabis consistent with the packaging requirements under RERACA and the Cannabis Policies and Procedures promulgated thereunder.

24 On February 10, 2022, the Investigator made another unannounced visit to a HighBazaar event located at 295 Treadwell Street, Hamden, CT, and purchased what Defendants represented to be cannabis products.

25 On the aforementioned date, the Investigator observed approximately sixty (60) vendors within the HighBazaar event offering for sale products purporting to be cannabis including, but not limited to lollipops, gummy bears, nerd ropes, gummy worms, cookies, and rice crispy treats.

26 The Investigator then registered for another HighBazaar event to take place on November 8, 2023. The Investigator obtained a free ticket on the event ticketing website, Eventbrite. The Investigator obtained a ticket to the event without verifying that the Investigator was at least 21 years old.

27 On November 8, 2023, the Investigator made a third unannounced visit to a HighBazaar event located at 3732 Whitney Avenue, Hamden, CT. The Investigator was

not asked to show identification or otherwise verify the Investigator's age before entering the HighBazaar event, nor did the Investigator observe the Defendants requesting identification from any other individuals entering the venue

28 On the aforementioned date, the Investigator purchased cannabis products

29 On the aforementioned date, the Defendants did not ask for the Investigator's identification or otherwise ask to verify the Investigator's age before purchasing the purported cannabis products or at any time while at the HighBazaar event

30 On the aforementioned date, the Investigator observed 14-16 vendors within the HighBazaar event offering for sale products purporting to be cannabis. All vendors were equipped with a scale and packaging supplies.

31 On November 20, 2023, the Investigator transmitted an eighth of an ounce of cannabis that the Investigator purchased at the HighBazaar event on November 8, 2023, to the Connecticut Agricultural Experiment Station to test the THC level of the product.

32 On January 3, 2024, the Connecticut Agricultural Experiment Station completed the analysis of the product, revealing the product purported to be cannabis purchased at the HighBazaar event on November 8, 2023, far exceeded a total THC level of 3 percent on a dry weight basis, classifying the product as cannabis under Conn. Gen. Stat. § 21a-420(3).

33 On January 4, 2024, Attorney General William Tong sent the Defendants a letter requesting that they immediately cease advertising, promoting, and organizing

HighBazaar events that allow for the unlicensed sale of cannabis to consumers. See *Ribeiro Affidavit, Exhibit F*

34 Through a social media posting, the Investigator became aware of another HighBazaar event scheduled for January 13, 2024. The Investigator again obtained a ticket on the event ticketing website, Eventbrite. The Investigator obtained a ticket to the event without verifying that the Investigator was at least 21 years old.

35 On January 13, 2024, the Investigator made a fourth unannounced visit to a HighBazaar event, this time located at 3417 Whitney Avenue, Hamden, CT, and purchased what Defendants represented to be cannabis products.

36 On the aforementioned date, the Defendants checked the Investigator's identification before entering. Upon entry, defendant Accettullo asked that the Investigator be discrete with the Investigator's purchases when leaving the building.

37 On the aforementioned date, the Investigator observed approximately ten vendors within the HighBazaar event offering for sale products purporting to be cannabis. All vendors were equipped with a scale and packaging supplies. None of the vendors had packaging for purchased cannabis consistent with the packaging requirements under RERACA and the Cannabis Policies and Procedures promulgated thereunder.

38 Since the aforementioned date, the Investigator has observed numerous advertisements for HighBazaar events on both social media platforms and Eventbrite. The advertisements since at least January 4, 2024, did not disclose the addresses of the HighBazaar events, only that these events were also to be held in Hamden, CT.

39 On or about January 16, 2024, the Investigator observed an advertisement for a HighBazaar event on a social media website scheduled for January 22, 2024. The advertisement did not disclose the location of the event.

40 Under Connecticut law, cannabis may only be sold by cannabis establishments that hold a retailer, hybrid retailer or dispensary facility cannabis establishment license (collectively, a "Retail Licensee") with the Department of Consumer Protection. Conn. Gen. Stat. § 21a-420c(a).

41 The Defendants do not hold any form of cannabis establishment license.

42 Under Connecticut law, a Retail Licensee may only obtain cannabis from a licensed cultivator, micro-cultivator, producer, product packager, food and beverage manufacturer, product manufacturer or transporter.

43 Upon information and belief, the Defendants did not or do not obtain the purported cannabis that is offered for sale at their HighBazaar events from a licensed cultivator, micro-cultivator, producer, product packager, food and beverage manufacturer, product manufacturer or transporter.

44 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that is not packaged in containers that are child-resistant, tamper-resistant, and light-resistant and are not resealable in such a manner that is continuously child-resistant and preserves the integrity of their contents.

45 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that is not contained in packaging that is entirely



and uniformly white, and such packaging contains print and graphics on their labels in violation of Connecticut law

46 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that did not contain the mandatory warning statement regarding the intoxicating effects of cannabis and potentially unhealthy side effects

47 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that did not contain the unique graphic required under the Cannabis Policies and Procedures advising consumers that the products contain THC and that did not contain the unique graphic required under the Cannabis Policies and Procedures warning consumers that the products are not safe or legal for individuals under the age of twenty-one

48 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events with advertising on its packaging that exceeded the maximum amount of total THC permissible under Connecticut law

49 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that was not cultivated or produced in facilities licensed by the Department of Consumer Protection and in a manner consistent with RERACA and the Cannabis Policies and Procedures promulgated thereunder

50 The Investigator purchased what Defendants represented to be cannabis at the Defendants' HighBazaar events that was not laboratory tested in accordance with

RERACA and the Cannabis Policies and Procedures promulgated thereunder

## **VI. CAUSES OF ACTION**

### **COUNT I – Unfair Trade Practices in Violation of CUTPA**

51 The allegations contained in paragraphs 1-50 are incorporated by reference as if they were set out herein

52 In connection with the Defendants' advertising, promoting, organizing, and operation of HighBazaar events, the Defendants acts and practices violate the public policy set forth in Conn Gen Stat. § 21a-420c(a), prohibiting any person other than a retailer, hybrid retailer, micro-cultivator, or delivery service licensed by the Department of Consumer Protection from selling or offering for sale cannabis to a consumer

53 The Defendants' acts and practices further violate the public policy set forth in RERACA and the Cannabis Policies and Procedures promulgated thereunder to, among other things (1) require cannabis products sold in Connecticut to be manufactured in facilities that meet strict safety standards, (2) require cannabis products to be laboratory tested for potentially harmful adulterants, (3) mandate maximum THC levels per serving size and per package to promote safe adult-use cannabis consumption, (4) mandate strict packaging and labeling to provide important information to consumers about the product, and (5) ensure that the products are not being marketed to individuals under the age of twenty-one

54 The Defendants' acts and practices as alleged herein are unethical, immoral, oppressive, and unscrupulous The Defendants' acts and practices as alleged

herein are unethical, immoral, oppressive, and unscrupulous and represent a substantial public safety risk to Connecticut consumers

55 The Defendants' acts and practices as alleged herein have caused substantial harm to Connecticut consumers inasmuch as they offered for sale cannabis that often meet, or exceed, the total THC levels of products offered for sale in the legal, adult-use cannabis market and which can cause the same, or greater, intoxicating effect as products offered for sale in the legal, adult-use cannabis market, but which do not meet appropriate health and safety standards, as set forth in RERACA and the Cannabis Policies and Procedures promulgated thereunder, and such products have the potential to adversely affect the health of Connecticut consumers and promote cannabis products to individuals under the age of twenty-one

56 The Defendants' acts and practices as alleged herein therefore constitute unfair acts or practices in violation of Conn Gen Stat § 42-110b(a)

**COUNT II - Willfulness**

57 The allegations contained in paragraphs 1-56 are incorporated by reference as if they were set out herein

58 The Defendants engaged in the aforementioned unfair trade acts or practices alleged herein when they knew, or should have known, that their conduct was unfair or deceptive in violation of Conn Gen Stat § 42-110b(a)

**VII. PRAYER FOR RELIEF**

Wherefore, the State prays for the following relief

1 Pursuant to Conn Gen Stat § 42-110m(a), that the Court issue a temporary and permanent injunction prohibiting the defendants Joseph R Accettullo and Cody Roberts, dba HighBazaar, and each of them, from violating CUTPA

2 Pursuant to Conn Gen Stat § 42-110m(a), that the Court issue a temporary and permanent injunction prohibiting the defendants Joseph R Accettullo and Cody Roberts, dba HighBazaar, and each of them, from organizing, operating, promoting, or advertising events where the unlicensed sale of cannabis occurs

3 An order pursuant to Conn Gen Stat § 42-110o(b) directing the Defendants to pay civil penalties for each willful violation of Conn Gen Stat. § 42-110b

4 An order pursuant to Conn Gen Stat § 42-110m(a), directing the Defendants to disgorge all gains achieved in whole or in part through the unfair acts or practices complained of herein

5 An order pursuant to Conn Gen Stat § 42-110m(a) directing the Defendants to pay restitution

6 An award of attorneys' fees, pursuant to Conn Gen Stat § 42-110m(a)

7 Costs of suit

8 Such other and further relief as the Court deems appropriate

DATED this January \_\_, 2024

Respectfully submitted,

PLAINTIFF  
STATE OF CONNECTICUT

WILLIAM TONG  
ATTORNEY GENERAL

/s/ Jonathon J Blake (juris no 426816)

Michael Nunes, Juris No 444379  
Addison S Kelty, Juris No 444782  
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**VERIFICATION**

STATE OF CONNECTICUT     )  
  ): ss.         Hartford, CT         January 18, 2024  
COUNTY OF HARTFORD     )

Personally appeared before me, Caylee Ribeiro, of the Office of the Attorney General, the subscriber, made the oath to the truth of the matters contained in the aforesaid Complaint.

  
\_\_\_\_\_  
Caylee Ribeiro

Subscribed and sworn to before me this 18<sup>th</sup> day of January, 2024.

  
\_\_\_\_\_  
Jonathan J. Blake  
Commissioner of the Superior Court

**III. NOTICE TO INTERESTED PARTIES**

Pursuant to Connecticut Practice Book § 4-5, Plaintiff represents that, on January 18, 2024, the undersigned caused to be hand delivered to the Defendants copies of these papers for this Application for *Ex Parte* Temporary Injunction with the date, time, and place at which the Plaintiff would be presenting this Application to the Court. See Exhibit 1. The marshal confirmed on that same date, via email, that the papers were delivered to the Defendants. See Exhibit 2. Furthermore, as indicated in the attached screenshot, the Defendants represented in a posting on social media that the event scheduled for Sunday, January 21, would be cancelled, presumably in response to their receipt of the papers. See Exhibit 3.

WHEREFORE, due to the circumstances presented in this case, namely the Defendants' continuing conduct in knowingly organizing and operating an illicit, unlicensed cannabis market in violation of CUTPA, the public policies set forth in RERACA, and the Cannabis Policies and Procedures promulgated thereunder, the State respectfully requests that the Court issue an *Ex Parte* Temporary Injunction in substantially the form attached hereto.

Respectfully submitted,

PLAINTIFF  
STATE OF CONNECTICUT

WILLIAM TONG  
ATTORNEY GENERAL

/s/ Jonathan J. Blake, Juris No. 426816

Jonathan J. Blake, Juris No. 426816

Addison S. Keilty, Juris No. 444782

Michael Nunes, Juris No. 444379

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[Michael.Nunes@ct.gov](mailto:Michael.Nunes@ct.gov)

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# EXHIBIT 1



OFFICE OF THE ATTORNEY GENERAL  
CONNECTICUT

JONATHAN J. BLAKE  
ASSISTANT ATTORNEY GENERAL

Phone: +1 860-808-5400

January 18, 2024

**By Select Delivery Method**

CODY ROBERTS  
10 Tibbets Road  
Seymour, CT 06483-2221

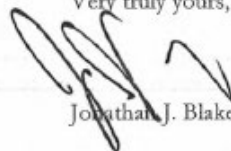
JOSEPH R. ACCETTULLO  
70 Clover Circle  
Hamden, CT 06514-2602

Re: *State of Connecticut v. Cody Roberts and Joseph Accettullo*

Dear Mr. Roberts and Mr. Accettullo:

I am writing pursuant to Section 4-5 of the Practice Book to notify you that the Attorney General intends to file the attached application for an immediate temporary injunction tomorrow morning, January 19, 2024, at 11:00 a.m. in the Hartford Superior Court, 95 Washington Street, Hartford, Connecticut, against you personally for violations as set forth in the attached Complaint.

Very truly yours,



Jonathan J. Blake

165 Capitol Avenue  
Hartford, Connecticut 06106

*An Affirmative Action/Equal Opportunity Employer*

# EXHIBIT 2

## FW: High Bazaar Application for TI.pdf



Blake, Jonathan

To ● Keilty, Addison; ● Nunes, Michael



9:26 AM

**From:** Brian Mezick <[statemarshal@mezick.com](mailto:statemarshal@mezick.com)>

**Sent:** Thursday, January 18, 2024 7:45 PM

**To:** Viera, Diana <[Diana.Viera@ct.gov](mailto:Diana.Viera@ct.gov)>

**Cc:** Blake, Jonathan <[Jonathan.Blake@ct.gov](mailto:Jonathan.Blake@ct.gov)>

**Subject:** Re: High Bazaar Application for TI.pdf

You don't often get email from [statemarshal@mezick.com](mailto:statemarshal@mezick.com). [Learn why this is important](#)

**EXTERNAL EMAIL:** This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Diana- these were served this evening. I had to ask the other marshal in my office, Madison Beggs to serve this. He will email you a return of service tomorrow morning.

Was not a fun last minute service. Everything is iced over tonight and Beggs got stuck in the defendants driveway in Seymour for an hour and as they pushed his car out in the dark!!

Get [Outlook for iOS](#)

# EXHIBIT 3



highbazaar.ct 6h



Tong decided to rob patients access of quality affordable medicine to force them to go to his homies at the shitty dispensaries this state has to offer!!

Sorry but this weekend is cancelled feel free to tell him why your mad!

SECRET L

**HIGH BAZAAR VS TONG**

**SUN JAN 21**

MAIN EVENT!  
15 ROUNDS!  
WATCH LIVE!  
THIS WILL NOT BE TELEVISED!

**BE RINGSIDE FOR THE GREATEST FIGHT IN HISTORY**

The poster features a colorful, abstract background with a yellow figure in the center. The text is arranged in a dynamic, overlapping layout. At the top left, it says 'SECRET L'. The main title 'HIGH BAZAAR VS TONG' is written in large, bold, white letters on a red, angular banner. Below this, the date 'SUN JAN 21' is displayed in large black letters. To the right, the event details are listed: 'MAIN EVENT!', '15 ROUNDS!', 'WATCH LIVE!', and 'THIS WILL NOT BE TELEVISED!'. At the bottom, a red banner contains the slogan 'BE RINGSIDE FOR THE GREATEST FIGHT IN HISTORY'.



highbazaar.ct 7h  
From Create Mode >



Better yet!!! Stay Tuned for the  
Next Meet up where we can  
Organize and Vote this dude and  
his cronies Out Of Office!!!!