

RETURN DATE: JULY 29, 2025	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT,	:	JUDICIAL DISTRICT
Plaintiff	:	OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
MICHAEL TEDESCO,	:	
MAKECTBETTER, LLC, and	:	
ZAFIR IQBAL,	:	
Defendants	:	JULY 3, 2025

VERIFIED COMPLAINT

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.

2. 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 ("Department" or "DCP") pursuant to Conn. Gen. Stat. § 42-110m(a).

3. Defendant Michael Tedesco ("Tedesco") resides at 317 Weeping Willow Lane, Fairfield, CT 06825, and is a principal of the defendant MAKECTBETTER, LLC.

4. Defendant MAKECTBETTER, LLC is or was a limited liability corporation registered in the State of Connecticut. MAKECTBETTER, LLC is listed as having forfeit its business registration with the Connecticut Secretary of State's Office as of August

20, 2024. At all relevant times hereto and upon information and belief, Tedesco directed, controlled, and/or participated in the acts and practices of MAKECTBETTER, LLC, including the acts and practices set forth herein, and purported to act on its behalf.

5. Defendant Zafir Iqbal ("Iqbal") resides at 1319 Old Colchester Road, Oakdale, CT.

6. Whenever reference is made in this complaint to any act or practice of 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.

JURISDICTION AND VENUE

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

8. Venue is proper in the Superior Court for the judicial district of Hartford pursuant to Conn. Gen. Stat. § 42-110d.

FACTUAL ALLEGATIONS

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

9. 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.

10. 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).

11. 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).

b. Defendants' Course of Conduct

12. Since at least January 2024, Defendants have represented to Connecticut retailers that they can obtain a cannabis establishment license from the Department on the retailer's behalf, for a significant fee, that would allow them to sell cannabis in their retail establishments.

13. On information and belief, Defendants have falsely claimed that they are connected with a "pilot program" in Connecticut that authorizes them to secure an exclusive license to sell cannabis for one interested business in each Connecticut town.

14. Defendants have also falsely claimed that they are affiliated with specific licensed Connecticut cannabis cultivators who will supply cannabis for sale after the business obtains the license.

15. These claims are fabrications: there is no such program; Defendants do not have, and have never had, the authority to obtain cannabis establishment licenses from the Department on behalf of retailers, nor have they had any reasonable basis to believe, or to represent to others, that they had such authority; and Defendants do not have any relevant relationship with genuinely licensed Connecticut cannabis establishments.

16. Defendants have provided multiple Connecticut retailers with forged documents purporting to be Department-issued cannabis establishment licenses after

collecting fees ranging between approximately twenty-five thousand dollars (\$25,000) and thirty thousand five hundred dollars (\$30,500) from such retailers, which fees Defendants split among themselves.

17. Further, Defendants have impersonated State officials in their scheme. The fabricated licenses purport to be issued on behalf of the Department and approved by Associate Attorney General Sandra Arenas, an official with the Connecticut Attorney General's Office.

18. No one with the Office of the Attorney General, including Associate Attorney General Arenas, is involved with approving or issuing cannabis licenses for the Department. No one with the Office of the Attorney General knew that Tedesco was using Associate Attorney General Arenas' name or consented to such use.

19. Even more egregiously, Defendants created an email account falsely purporting to belong to Associate Attorney General Arenas, to which Defendants maintained access and from which they sent emails purportedly on behalf of the State in furtherance of their scheme.

20. Defendants' scheme appears widespread. On information and belief, Defendant Iqbal claimed as of late 2024 or early 2025 that Defendants had entered into agreements with approximately 35 businesses to obtain these fraudulent cannabis licenses.

21. Thirty-five may be a conservative number: on information and belief, at a similar point in time, Defendant Tedesco boasted that seventy (70) businesses had entered into agreements to obtain cannabis licenses from Defendants.

22. Defendants have sold or attempted to sell fake cannabis licenses in towns across the state using this scheme.

23. The following examples are representative of Defendants' scheme:

Grab 'N Go Mart and New Milly Smoke Shop

24. In or about January 2024, Defendant Iqbal introduced Tedesco to Ali Azhar, owner of two convenience stores, Grab 'N Go Mart LLC, in New Haven and New Milly Smoke Shop in New Milford. Tedesco told Azhar that he knew many people with high positions "at the State" and that he was authorized to sell five cannabis establishment licenses that the State was offering.

25. Tedesco provided Azhar with a contract in which Defendants agreed to obtain for Azhar's businesses Adult-Use Cannabis Hybrid Retailer licenses for \$25,000 per store, which would allow Azhar to purchase up to 100 units of cannabis per month to sell in his stores. The contract was later updated to allow Azhar to purchase up to 250 units of cannabis for his stores and was updated once more to allow him to purchase 500 units per month.

26. On or about January 25, 2024, Azhar provided Tedesco a check payable to "MAKECTBETTER" in the amount of \$25,000, with the memo line "License Flower" for the Grab 'N Go store.

27. On or about March 3, 2024, Tedesco also provided to Azhar a letter on DCP letterhead, purportedly from Sandra Arenas, Associate Attorney General, indicating that Grab 'N Go Mart LLC was approved to distribute "Legal Cannabis" in the State starting on May 1, 2024. See Exhibit A hereto.

28. The letter Tedesco provided to Azhar is a forgery.

29. The letter referenced in paragraph 24 was accompanied by a document purporting to be an Adult-Use Cannabis Hybrid Retailer license issued by DCP for Grab

'N Go Mart LLC. See Exhibit B hereto.

30. In truth and in fact, the document is a forgery of a DCP cannabis establishment license.

31. On or about January 26, 2024, Azhar provided a second check to Tedesco made out to "MAKECTBETTER" in the amount of \$25,000 with the memo line "License Flower." This check was for a purported cannabis establishment license for Azhar's other shop, New Milly Smoke Shop.

32. Tedesco presented Azhar with a document purporting to be an Adult-Use Cannabis Hybrid Retailer license issued by DCP for New Milly Smoke Shop, LLC. See Exhibit C hereto. In truth and in fact, the document is a forgery of a DCP cannabis establishment license.

Happy Puff, LLC

33. Beginning on or about June 2024, Defendant Iqbal entered into a partnership with Fouzia Qamar, of Manchester, to open a retail cannabis dispensary called Happy Puff, LLC, at 352 Main Street in Manchester.

34. Defendant Iqbal represented that he would be able to contribute to Happy Puff, LLC by helping the business obtain a Connecticut hybrid retailer license.

35. Unbeknownst to Qamar, Defendant Iqbal had no ability or intention to obtain a legitimate hybrid retailer license and lured Qamar into business on false pretenses.

36. Defendant Iqbal represented that Defendant Tedesco would assist Happy Puff LLC in obtaining the license for a total of \$30,500, which would include a \$10,000 payment ostensibly to the State, a \$10,000 payment to Defendant Tedesco, a \$5,000 payment to Iqbal, a \$5,000 payment for marijuana products, and \$500 for a scanner.

37. Defendant Iqbal paid, or caused to be paid, these amounts to Tedesco

using Happy Puff, LLC corporate funds.

38. Defendants Iqbal and Tedesco represented to Happy Puff, LLC that Defendant Tedesco was an agent of a certain licensed cannabis distributor; had obtained cannabis licenses for other clients in the past; had connections with key personnel at the State of Connecticut that would be helpful in obtaining a cannabis license; and that it was certain Tedesco could obtain the hybrid retailer license for Happy Puff, LLC.

39. All of these statements were lies.

40. Defendant Iqbal provided a forged cannabis license for Happy Puff LLC and a forged cannabis ID card for Qamar.

41. Both forged licenses contained the license number CHPL001754, a fictitious number.

CAUSES OF ACTION

COUNT I – Deceptive Practices Under CUTPA

42. The allegations contained in paragraphs 1-41 are incorporated by reference as if they were set forth herein.

43. Defendants represented to consumers, directly or indirectly, expressly or by implication, that they could facilitate obtaining a cannabis establishment license from DCP for consumers operating retail stores in exchange for a fee.

44. In truth and in fact, the Defendants did not have the authority to obtain cannabis establishment licenses for consumers and forged documents to make it appear as if the Defendants had obtained such licenses.

45. Defendants' acts and practices, as described herein, were likely to mislead consumers acting reasonably under the circumstances into believing that Defendants were authorized to obtain licenses from DCP to permit them to sell cannabis in their retail

stores.

46. Defendants' representations that they would be able to obtain, or assist in obtaining, official Connecticut cannabis establishment licenses, were material to consumers' decisions about whether to engage in a transaction with Defendants and pay Defendants the fees demanded.

47. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of Conn. Gen. Stat. § 42-110b(a).

COUNT II – Willfulness (as to Deceptive Practices)

48. The allegations contained in paragraphs 1-47 are incorporated by reference as if they were set out herein.

49. The Defendants engaged in the aforementioned deceptive 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).

COUNT III – Per Se CUTPA Violations Under Regs. Conn. State Agencies § 42-110b-18

50. The allegations contained in paragraphs 1-41 are incorporated by reference as if they were set forth herein.

51. Section 42-110b-18 of the Regulations of Connecticut State Agencies provides, in part, that it shall be an unfair or deceptive practice to misrepresent "the sponsorship, endorsement, approval, or certification of merchandise or services," and to "misrepresent the affiliation, connection or association of any merchandise, services, or business establishment." See Regs. Conn. State Agencies § 42-110b-18 (c) and (d).

52. Defendants' acts and practices violate § 42-110b-18(c) and (d) and constitute per se violations of CUTPA because Defendants misrepresented an

endorsement, certification, and affiliation with the Department of Consumer Protection and the Office of the Attorney General in the following ways: they misrepresented that they had the authority to obtain a cannabis establishment license for consumers; they provided consumers with a forged document purporting to be a DCP-issued cannabis establishment license; and they provided consumers with a forged document on DCP letterhead purporting to be from an employee of the Attorney General's Office.

53. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of Conn. Gen. Stat. § 42-110b(a).

COUNT IV – Willfulness (as to Per Se CUTPA Violations Under Reg. State Agencies § 42-110b-18)

54. The allegations contained in paragraphs 1-41 and 50-53 are incorporated by reference as if they were set out herein.

55. 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).

COUNT V – Unfair Practices Under CUTPA

56. The allegations contained in paragraphs 1-41 are incorporated by reference as if they were set forth herein.

57. Defendants' course of conduct violates the public policy of this State, including as set forth in Conn. Gen. Stat. § 53a-119, which prohibits the obtaining of property under false pretenses or false promises.

58. Defendants' course of conduct as alleged herein was unethical, immoral, oppressive, and unscrupulous.

59. Defendants' course of conduct as alleged herein caused substantial harm

to consumers that paid them substantial amounts of money for forged and bogus cannabis establishment licenses.

60. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of Conn. Gen. Stat. § 42-110b(a).

COUNT VI – Willfulness (as to Unfair Practices Under CUTPA)

61. The allegations contained in paragraphs 1-41 and 56-60 are incorporated by reference as if they were set out herein.

62. 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).

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 ordering Defendants not to engage in, and to cease engaging in, any business or activity that falsely purports to assist consumers in obtaining a cannabis establishment license from the Department of Consumer Protection, specifically including but not limited to falsely using any name, title, mark, graphic, address, or any other feature of, or falsely implying any endorsement from, connection with, or approval by, any office or officer of the State of Connecticut.
2. Pursuant to Conn. Gen. Stat. § 42-110m(a), that the Court issue a temporary and permanent injunction as to Defendants against violating the Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110a *et seq.* in connection with marketing, advertising, offer, sale, and any other aspect of trade or commerce related to the sale of cannabis in this State.
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 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 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.

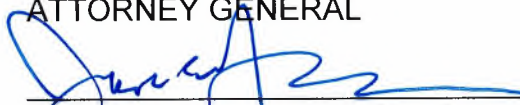
The State certifies that the amount in demand is greater than fifteen thousand dollars (\$15,000), exclusive of interests and costs.

DATED this July 3, 2025.

Respectfully submitted,

PLAINTIFF
STATE OF CONNECTICUT

WILLIAM TONG
ATTORNEY GENERAL

A handwritten signature in blue ink, appearing to be "Joseph E. Gasser", is written over a horizontal line.

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VERIFICATION

STATE OF CONNECTICUT)

) ss.

Hartford, CT


July 3 2025

COUNTY OF HARTFORD)

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


Caylee Silva

Subscribed and sworn to before me this 3rd day of July, 2025.



Rebecca Quinn

Commissioner of the Superior Court

EXHIBIT A



CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION

March 3, 2024

Business ALEI
1293531

GRAB 'N GO MART LLC
784 CHAPEL STREET
NEW HAVEN, CT, 06510

Dear Business owner:

You are approved to distribute Legal Cannibals in the State of Connecticut starting May 1, 2024

You will receive your licenses two weeks before your legal start date.



SANDRA ARENAS

Associate Attorney General / Chief of the Division of Consumer and Constituent Affairs

Office of the Attorney General



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www.ct.gov/DCP |  facebook.com/ctdcp |  [@ctdcp](https://twitter.com/ctdcp)

EXHIBIT B

STATE OF CONNECTICUT • DEPARTMENT OF CONSUMER PROTECTION

Be it known that

GRAB N GO Mart , LLC
784 Chapel Street,
New Haven, CT 06510

has satisfied the qualification required by law and hereby registered as a

Adult-Use Cannabis Hybrid Retailer

Registration # CHRL 00110111

Effective: 05/02/2024

Expiration: 05/02/2029

Barry L. Geller
Barry L. Geller, Commissioner

Do not display before effective date

Exhibit C

