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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 S.S.L INVESTMENTS, LLC, a
15 California limited liability company,

16 *Plaintiff,*

17 v.

18 ASHA OROSKAR, an individual;
19 ANIL OROSKAR, an individual;
20 PRIYANKA SHARMA, an individual;
21 PULAK SHARMA, an individual;
22 GREGORY ROCKLIN, an individual;
23 OROCHEM TECHNOLOGIES, INC.,
24 an Illinois corporation; KAZMIRA,
25 LLC; a Delaware limited liability
26 company; and DOES 1 through 10,
27 inclusive,

28 *Defendants.*

Case No.:

COMPLAINT FOR DAMAGES

- 1. RICO (18 U.S.C. §1962(c))
- 2. Conspiracy to Violate RICO (18 U.S.C. §1962(d))
- 3. Fraud (Intentional Misrepresentation)
- 4. Fraudulent Concealment
- 5. Unlawful Business Practices (Cal. Bus. & Prof. Code §§ 17200 *et seq.*)
- 6. False Advertising (Cal. Bus. & Prof. Code §§ 17500 *et seq.*)

JURY TRIAL DEMANDED

ROSEN ✦ SABA, LLP
2301 Rosecrans Avenue, Suite 3180, El Segundo, CA 90245

1 **TO THIS HONORABLE COURT AND ALL INTERESTED PARTIES:**

2 Plaintiff S.S.L INVESTMENTS, LLC (“SSL”) alleges the following claims
3 against Defendants ASHA OROSKAR; ANIL OROSKAR; PRIYANKA SHARMA;
4 PULAK SHARMA; GREGORY ROCKLIN; OROCHEM TECHNOLOGIES, INC.;
5 and KAZMIRA, LLC (collectively “Defendants”) as follows:

6
7 **THE PARTIES**

8 1. Plaintiff S.S.L INVESTMENTS, LLC is a California limited liability
9 company. During the relevant time period, SSL’s principal place of business was
10 located at 9419 Mason Avenue, Chatsworth, California 91311. SSL’s current address
11 is 10700 San Monica Blvd, Suite 203, Los Angeles, CA 90025. SSL is and was
12 member managed by Michael Yedidsion, Pedram Salimpour, H. Troy Farahmand,
13 and Bob Kashani, each of whom are domiciled in California.

14 2. Defendant OROCHEM TECHNOLOGIES, INC. (“Orochem”) is a
15 corporation organized under the laws of Illinois with its principal place of business
16 at 340 Shuman Boulevard, Naperville, Illinois 60563. Orochem represents that it is
17 a “leading provider for specialty purification technologies” and “a global expert in
18 chromatography, including Simulated Moving Bed (“SMB”) chromatography.” On
19 information and belief, Orochem is a private company that is wholly owned by Asha
20 Oroskar and Anil Oroskar.

21 3. Defendant ASHA OROSKAR is an individual who is domiciled in
22 Naperville, Illinois. At all relevant times, she was the principal, President, and Chief
23 Executive Officer of Orochem.

24 4. Defendant ANIL OROSKAR is an individual who is domiciled in
25 Naperville, Illinois. At all relevant times, he was the principal and Chief Technology
26 Officer of Orochem.

27 5. Plaintiff KAZMIRA, LLC (“Kazmira”) is currently a Delaware limited
28 liability company with its principal place of business at 34501 E. Quincy Ave.,

1 Building 35, Watkins, Colorado, 80137. In January 2017, Kazmira was formed by
2 Anil Oroskar, Asha Oroskar, and Orochem as a Colorado limited liability company
3 with its principal place of business is located at 34501 E. Quincy Ave., Building 35,
4 Watkins, Colorado 80137. In May 2020, Kazmira registered as a Delaware limited
5 liability company. On information and belief, Kazmira is a private company that is
6 owned by Asha Oroskar and Anil Oroskar, and is a subsidiary, partner, and/or
7 licensee of Orochem. Kazmira uses Orochem's chromatography equipment to make
8 cannabidiol oil that is derived from hemp. Kazmira's co-Chief Executive Officers
9 are Defendants Priyanka Sharma and Pulak Sharma, who are the children of Asha
10 Oroskar and Anil Oroskar. The land on which Kazmira's facility is located is owned
11 by APPoGee Kazmira, LLC, a real estate holding company with the sole purpose of
12 holding title to the property. The only members of APPoGee Kazmira, LLC are Asha
13 Oroskar and Anil Oroskar.

14 6. Defendant PRIYANKA SHARMA is an individual who is domiciled in
15 Denver, Colorado. Mrs. Sharma is the daughter of Defendants Anil Oroskar and
16 Asha Oroskar, and the wife of Defendant Pulka Sharma. At all relevant times, she
17 was the co-CEO of Kazmira.

18 7. Defendant PULAK SHARMA is an individual who is domiciled in
19 Denver, Colorado. Mr. Sharma is the son-in law of Defendants Anil Oroskar and
20 Asha Oroskar, and the husband of Defendant Priyanka Sharma. At all relevant times,
21 he was the co-CEO of Kazmira.

22 8. Defendant GREGORY ROCKLIN is an individual who is domiciled in
23 Atherton, California. At all relevant times, he was the business development agent
24 for Defendants Asha Oroskar, Anil Oroskar, Priyanka Sharma, Pulak Sharma,
25 Orochem, and Kazmira.

26 9. The true names and capacities, whether individual, corporate, associate,
27 or otherwise, of the defendants named herein as DOES 1 to 10, are unknown to
28 Plaintiff at this time and therefore said defendants are being sued by such fictitious

1 names. The full extent of the facts linking such fictitiously sued Defendants is
2 unknown to Plaintiff. Plaintiff is informed and believes and based thereon allege that
3 each of the defendants designated herein as a DOE was, and is legally responsible in
4 some manner or means for the events and happenings referred to herein and
5 proximately caused damage to Plaintiff, either through their own conduct or the
6 conduct of their agents, servants, or employees, or due to their ownership,
7 supervision, and/or management of the employees, agents, entities, and/or
8 instrumentalities that caused said damages, or in some other manner or means that is
9 presently unknown to Plaintiff. Plaintiff will hereafter seek leave of the Court to
10 amend this Complaint to show the fictitiously sued defendants' true names and
11 capacities, after the same have been ascertained.

12 10. At all times mentioned herein, each of the Defendants was the agent,
13 principal, partner, alter-ego, joint venturer, employee, and/or authorized
14 representative of every other Defendant and, in doing the things hereinafter alleged,
15 was acting within the course and scope of such agency, service, and representation
16 and directed, aided and abetted, authorized, and/or ratified each and every act and
17 conduct hereinafter alleged.

18 11. Plaintiff is informed and believes, and based thereon alleges, that the
19 business affairs of Orochem, Asha Oroskar and Anil Oroskar are, and at all times
20 relevant were, so mixed and intermingled that they cannot reasonably be segregated,
21 and are in inextricable confusion such that a unity of interest and ownership existed,
22 including the comingling of assets and the use of Asha Oroskar and Anil Oroskar
23 personal telephone, cellular phone, computers, computer software, portable
24 electronic devices, email accounts, bank accounts, and other personal devices and/or
25 accounts in carrying out the actions alleged herein as and/or on behalf of Orochem.
26 Orochem is, and at all times relevant hereto was, used by Defendants Asha Oroskar
27 and Anil Oroskar as a shell and conduit for the conduct of certain of their affairs and
28 is, and was, the alter ego of Defendants Anil Oroskar and Asha Oroskar. The

1 recognition of the separate existence of Orochem would be unfair and would not
2 promote justice, in that it would permit Asha Oroskar and Anil Oroskar to wrongfully
3 insulate themselves from liability to Plaintiff. Accordingly, Defendant Orochem
4 constitutes the alter ego of Asha Oroskar and Anil Oroskar, and the fiction of its
5 separate existence should be disregarded.

6 12. Plaintiff is informed and believes, and based thereon alleges, that the
7 business affairs of Kazmira, Orochem, Anil Oroskar, Asha Oroskar, Priyanka
8 Sharma, and Pulak Sharma are, and at all times relevant were, so mixed and
9 intermingled that they cannot reasonably be segregated, and are in inextricable
10 confusion such that a unity of interest and ownership existed, including the
11 comingling of assets and the use of Orochem, Anil Oroskar, Asha Oroskar, Priyanka
12 Sharma, Pulak Sharma's personal telephone, cellular phone, computers, computer
13 software, portable electronic devices, email accounts, bank accounts, and other
14 personal devices and/or accounts in carrying out the actions alleged herein as and/or
15 on behalf of Kazmira. Kazmira is, and at all times relevant hereto was, used by
16 Defendants Orochem, Anil Oroskar, Asha Oroskar, Priyanka Sharma, Pulak Sharma
17 as a shell and conduit for the conduct of certain of their affairs and is, and was, the
18 alter ego of Defendants Orochem, Anil Oroskar, Asha Oroskar, Priyanka Sharma,
19 Pulak Sharma. The recognition of the separate existence of Kazmira would be unfair
20 and would not promote justice, in that it would permit Orochem, Anil Oroskar, Asha
21 Oroskar, Priyanka Sharma, Pulak Sharma to wrongfully insulate themselves from
22 liability to Plaintiff. Accordingly, Defendant Kazmira constitutes the alter ego of
23 Orochem, Anil Oroskar, Asha Oroskar, Priyanka Sharma, Pulak Sharma, and the
24 fiction of its separate existence should be disregarded.

25 26 **JURISDICTION AND VENUE**

27 13. The Court has jurisdiction over the subject matter of this action under
28 28 U.S.C. §§1331 and 1338 in that this action arises under the laws of the United

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