

3. THE AGRICULTURE IMPROVEMENT ACT OF 2018, more commonly known as the 2018 Farm Bill, established hemp as an agricultural commodity and removed hemp as a scheduled substance from the federal CONTROLLED SUBSTANCES ACT. Governor Greg Abbott followed suit, signing Texas House Bill 1325 into law on June 10, 2019, establishing a hemp program in Texas.

4. Crown distributes its hemp-derivative goods across the United States and abroad.

5. To make its hemp-derivative goods, Crown purchases raw hemp material, known as biomass.



6. The biomass is then processed for inclusion into Crown's finished goods.

7. Manufacturers and distributors often enter into agreements with brokers or brokerage firms, companies that locate raw hemp material for purchase by the buyer that hires them.

8. Buyers generally provide quality parameters to the broker, including specified cannabidiol ("CBD") content.

9. CBD is one of over 120 phytocannabinoids, or chemicals, occurring naturally in the hemp plant.

10. This action arises out of Crown's reliance on Defendants' multiple representations that Defendant were capable of locating and providing the desired biomass material to Crown.

Based on Defendants' representations, Crown remitted \$200,000.00 for the purchase of the biomass.

11. Despite Defendants' multiple representations to Crown that material in the amount and quality that Crown desired could be procured, Defendants provided material that did not meet the express quality conditions provided by Crown.

12. Upon shipment to Crown's Dallas facility, Crown rejected the nonconforming material and requested that it be immediately removed from its facilities.

13. Subsequently, Defendants attempted to cure their breach by providing substitute material. The substitute material was also deficient. Crown rejected the substitute material and requested that it immediately be removed from its facilities.

14. Despite multiple demands for return of the \$200,000.00 Crown remitted, Defendants have retained Crown's funds, have not provided the desired hemp plant material, and have failed to remove the rejected materials from Crown's facility. Crown has incurred ongoing fumigation and storage costs for the deficient material.

II. PARTIES

15. Crown Distributing LLC is a Texas limited liability company duly organized in the State of Texas. Crown Distributing's principal place of business is located at 2861 Congressman Lane, Dallas, Texas 75220. Crown Distributing LLC's sole member is Mansoor Alibhai. Mr. Alibhai is a citizen of Texas.

16. Defendant Ice Suppz, LLC is a Nevada limited liability company duly organized in the State of Nevada. Ice Suppz, LLC's principal place of business is located at 2831 St. Rose Parkway Suite 200-400, Henderson, Nevada 89052. It may be served by and through its registered agent, LegalCorp Solutions, LLC, at 2831 St. Rose Parkway Suite 200-400, Henderson, Nevada 89052.

17. Upon information and belief, Defendant Ice Suppz, LLC's sole member is Josh Becker, who is a resident and citizen of Oregon, domiciled and residing in Oregon at 16285 SW 85th Avenue, Suite 107, Portland, Oregon 97224-5421.

18. Defendant Nalpdog LLC is a Nevada limited liability company duly organized in the State of Nevada. Nalpdog's principal place of business is located at 2831 St Rose Parkway Suite 200-400, Henderson, Nevada 89052, and it may be served by and through its registered agent, LegalCorp Solutions, LLC, at 2831 St Rose Parkway Suite 200-400, Henderson, Nevada 89052.

19. Upon information and belief, Defendant Nalpdog LLC's sole member is Ice Suppz, LLC, a Nevada limited liability company duly organized in the State of Nevada, located at 5320 Cameron Street, No. 7, Las Vegas, Nevada 89118.

20. Upon information and belief, Defendant Josh Becker is a citizen of Oregon, domiciled and residing in Oregon at 16285 SW 85th Avenue, Suite 107, Portland, Oregon 97224-5421. Defendant Josh Becker may be served at this listed Oregon address.

III. JURISDICTION AND VENUE

21. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because the parties are diverse and the amount in controversy exceeds \$75,000.

22. This Court has personal jurisdiction over the parties because the acts and omissions of Defendants subject to this Complaint all occurred in Texas or were directed toward Texas.

23. Defendant Ice Suppz offers its brokerage and supplier services to Texas residents.

24. Defendant Josh Becker offers his brokerage services to Texas residents.

25. Defendants Nalpdog and Josh Becker solicited the business of Crown Distributing LLC, located in Dallas, Texas, and Defendant Josh Becker entered into an oral contract with Plaintiff for the sale of tens of thousands of pounds of hemp material to Texas.

26. Becker entered into multiple previous contracts with Plaintiff for the sale of hemp

product to Plaintiff in Texas. And Becker sent numerous large bags of sample material to Crown in Texas to induce Crown into the contract at issue

27. For a period of over six months, Defendants negotiated and communicated with Crown regarding the matters complained of herein.

28. Defendants shipped or caused to be shipped several truckloads of raw hemp material into Texas on multiple occasions.

29. These shipments occurred over a period of several months and were based on numerous repeated negotiations regarding the quality of hemp Defendants delivered to Texas, and all communications were directed to Plaintiff in Texas.

30. Defendants offer for sale and sell hemp materials to Texas residents.

31. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2), as a substantial part of the events giving rise to Plaintiff's claims occurred in Dallas, Texas.

IV. FACTS

32. Crown is a Dallas-based manufacturer and distributor of hemp-derivative goods.

33. Defendant Josh Becker is an individual that brokers transactions for sourcing and purchasing of raw hemp plant material.

34. Defendant Ice Suppz is a brokerage firm/supplier that offers and provides services for sourcing raw hemp plant material.

35. Defendant Nalpdog is an entity that offers and provides services for sourcing and providing raw hemp plant material.

36. Crown hired Josh Becker; however, unbeknownst to Crown at the time, Josh Becker is a member of, owns, and/or is affiliated with multiple entities, such as Ice Suppz and Nalpdog. In determining to contract with Mr. Becker, Mr. Becker represented he was capable of brokering the transaction and providing the desired material in the amount and quantity that Crown



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