

COMMONWEALTH OF MASSACHUSETTS
TRIAL COURT OF THE COMMONWEALTH

BERKSHIRE, ss.

SUPERIOR COURT DEPT.
Civil Action No.

LAURA PRATT,
Plaintiff

v.

KERRY RAHEB, RENEE HOUSTON,
& INDICA LLC d/b/a INDICA CANNABIS
Defendants

COMPLAINT

PARTIES

1. Plaintiff Laura Pratt is an individual with an address of 75 Depot Street, Cheshire, Massachusetts ("Plaintiff").
2. Defendant Kerry Raheb is an individual with an address of 1172 Bluestone Road, Bennington, Vermont ("Raheb").
3. Defendant Renee Houston is an individual with an address of 1172 Bluestone Road, Bennington, Vermont ("Houston").
4. Defendant Indica LLC d/b/a Indica Cannabis is Massachusetts limited liability company with a business address of 127 Columbia Street, Adams, Massachusetts ("Indica" and together with Raheb and Houston, the "Defendants").

BACKGROUND

5. Indica is a cannabis dispensary business located in Adams, Massachusetts.
6. Raheb is the owner, founder and chief executive officer of Indica.
7. Houston is the chief operations officer of Indica.
8. On information and belief, Raheb and Houston are married.
9. Raheb and Houston both control, direct, formulate, and determine the financial affairs of Indica.

10. On February 27, 2023 the Plaintiff entered into a written contract with Indica and Raheb for a salary of \$65,000 per year with a \$5,000 guaranteed bonus for the first quarter of Indica's first fiscal year. *See* Employment Contract attached as Exhibit A.
11. The Plaintiff worked for the Indica from January 1, 2023 through June 11, 2023, and from June 22, 2023 to July 20, 2023.
12. The Plaintiff worked full time for Indica as an inventory manager and store manager.
13. Indica and Raheb never paid the Plaintiff the agreed upon salary.
14. At times the Plaintiff worked over 40 hours per week for the Defendants.
15. Between January and April 2023, Plaintiff was given intermittent cash payments totaling \$3,135.
16. Between May 16, 2023 and August 2023, Plaintiff received payroll checks totaling \$2,184.14.
17. Copies of \$1,872.98 worth of these payroll checks are attached hereto as Exhibit B.
18. One of those checks was for \$300, which was cashed by the Plaintiff and given to Raheb at his request.
19. The Plaintiff received no additional wage payments from the Defendants.
20. The Plaintiff is owed her unpaid wages from her work for the Defendants.
21. The Plaintiff filed a wage complaint with the Massachusetts Office of the Attorney General - Fair Labor Division (the "Attorney General"), in which she alleged that the Defendants committed wage violations in connection with Plaintiff's employment with the Defendants.
22. On or about July 26, 2023, pursuant to G.L. c. 149 § 150, the Attorney General assented in writing to the Plaintiff's request to institute a civil action and prosecute the wage complaint on her own behalf.
23. All conditions precedent to this lawsuit have been met.

COUNT I
VIOLATION OF THE MASSACHUSETTS NON PAYMENT OF WAGES STATUTE
(G.L. c. 149 § 148)

24. The Plaintiff restates all previous paragraphs.
25. The Defendants have not paid the Plaintiff pursuant to the requirements of G.L. c. 149

25. Due to the Defendants' actions and inactions, the Plaintiff has suffered damages.

COUNT II
VIOLATION OF THE MASSACHUSETTS MINIMUM WAGE LAW
(G.L. c. 151 § 1)

26. The Plaintiff restates all previous paragraphs.

27. In rendering services to the Defendants, the Plaintiff was not paid according to the requirements of G.L. c. 151 § 1.

28. Due to the Defendants' actions and inactions, the Plaintiff has suffered damages.

JURY TRIAL DEMAND

The Plaintiff demands a trial by jury on all issues and counts so triable.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff moves this Court to grant a Judgment for her against the Defendants and the following relief:

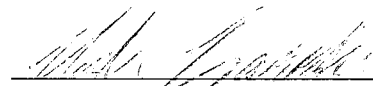
1. Money damages as permitted by law;
2. Treble damages pursuant to G.L., c. 149;
3. Attorney's Fees pursuant to G.L., c. 149;
4. Court costs and interest;
5. Equitable relief; and
6. Such other relief as the Court deems fair and just.

[Signature page to follow]

LAURA PRATT, PLAINTIFF

By her attorneys,

CAMPOLI, MONTELEONE & MOZIAN, P.C.



Matthew Mozian, Esquire (BBO #: 669114)

mmozian@campolilaw.com

Nicholas M. Zaricki, Esquire (BBO #: 709852)

nzaricki@campolilaw.com

27 Willis St., P.O. Box 1384

Pittsfield, MA 01202

(413) 443-6485

Dated: October 17, 2023
Pittsfield, Massachusetts

EXHIBIT A



Compensation Package

Laura Anne Pratt

FULL TIME

As Store Manager & Inventory Manager of INDICA LLC (Adams, MA)

Salary

Year (1) : \$65,000.00 annually

Year (2) : \$85,000.00 annually

Year (3-5): \$105,000.00 annually

*Additional Compensation

Performance Bonus

Year (1): **\$5,000.00** potential per fiscal quarter based on pre-determined sales projections. Fiscal quarter (1) of the Company's Fiscal year (1) is an automatic bonus per agreement. **\$20,000.00 max per fiscal year 1.**

Year (2): **\$5,500.00** potential per fiscal quarter based on pre-determined sales projections. **\$22,000.00 max for fiscal year 2.**

Year (3-5): **\$6,000.00** potential per fiscal quarter based on pre-determined sales projections. **\$24,000.00 max for fiscal years 3-5.**



INDICA
ADAMS, MA

A large, flowing handwritten signature in black ink, appearing to read "Laura Anne Pratt".

Laura Anne Pratt

A handwritten date "2/27/23" in black ink.

Date

A handwritten signature in black ink, appearing to read "Kerry P. Raheb".

Kerry P. Raheb

Owner Indica LLC

A handwritten date "2/27/23" in black ink, with the numbers separated by vertical lines.

Date

EXHIBIT B

05/17/2023 1075 \$420.00

[illegible]

05/17/2023	\$420.00
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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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AMERICA LLC
Pay to the order of Laura Pratt
1077
5/26/23
\$300.00
GFA
1077

05/26/2023 1077 \$300.00

243101066
1077
Dated 05/26/23
Handwritten: 1077

CHECKING / SAVINGS / MONEY MARKET DEPOSIT
BerkshireBank
DATE 5-26-23
NAME Laura Pratt
300.00
ACCOUNT NUMBER [REDACTED]
300.00
45011-12961

05/26/2023 \$300.00

Check # 1077
5/26/23
1077
05/26/23
1077



America's Most Exciting Bank
P.O. Box 1308, Pittsfield, MA 01202

Current Date: September 22, 2023
Account Number: 52880335
Capture Date: July 06, 2023
Item Number: [REDACTED]
Posted Date: July 06, 2023
Amount: 489.95
Record Type: Foreign Item (Not On Us)

INDICA LLC

7/1/23 Date

1139
5383062113

Pay to the Order of Laura Pratt \$ 489.95

Four hundred eighty nine and 95/100 Dollars

GFA
FEDERAL CREDIT UNION
220 PARKER STREET
GARDNER, MASS 01459

For Keyroll

1139

1139

211381066

1139

- Security Features exceed industry standards and include:
- ImageMatch - Matching amount and check number on back (211381066)
 - Mobile Deposit - Mobile Deposit check mark to indicate check has been deposited via mobile device
 - The Security Weave - pattern on back designed to deter fraud
 - Microprint lines printed on front and back
 - The words "ORIGINAL DOCUMENT" across the back
 - Photo Safe Deposit - icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive ink on back (no pen or ballpoint mark)
- Brown stains or colored spots appear on both front and back

☐ CHECK BOX FOR MOBILE/REMOTE DEPOSIT
WRITE NAME OF FINANCIAL INSTITUTION ON LINE ABOVE

ENDORSE HERE
Laura Pratt



America's Most Exciting Bank
P.O. Box 1308, Pittsfield, MA 01202

Current Date: September 22, 2023
Account Number: 52880335
Capture Date: July 10, 2023
Item Number: [REDACTED]
Posted Date: July 10, 2023
Amount: 663.03
Record Type: Foreign Item (Not On Us)

INDICA LLC

1144
53 8306 2113
5
CHECK IMAGE

July 10, 2023
Date

Pay to the Order of Laura Pratt \$ 663.03
Six hundred sixty three and 03/100 Dollars

GFA
FEDERAL CREDIT UNION
200 PARKER STREET
GANDENIA, MASS 01460

For Payroll 6/25-7/1/2023

1144

1 2 1 3 8 3 0 6 6 1 [REDACTED]

2 1 3 8 3 0 6 6 1 [REDACTED]

1144

Security Features exceed industry standards and include:

- ImageMatch - Matching account and check number on front and back
- Microprint - Microprint check with to indicate check has been deposited via mobile device
- Tint Security - Two tint patterns on back designed to deter fraud
- Fingerprint - Fingerprint pattern on front and back
- U.S. Mint - Original DOLLAR NOTE across the back
- Photo Safe Deposit - Icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Faint or ink on back looks pink or has a gray tint
- Faint lines or colored spots appear on both front and back

☐ CHECK BOX FOR MOBILE REMOTE DEPOSIT
WRITE NAME OF FINANCIAL INSTITUTION ON LINE ABOVE

END OF HERE
X
Laura Pratt