



**Department of  
Cannabis Control**  
CALIFORNIA

**Gavin Newsom**

Governor

**Nicole Elliott**

Director

July 30, 2025

**VIA EMAIL AND CERTIFIED MAIL**

MK Health Alliance, LLC  
Brandon Mullins, Owner  
4401 San Leandro St., Unit #27  
Oakland, CA 94601

Brandon Mullins  
115-C Arnold Dr.  
Martinez, CA 94553  
brandoncolemullins@gmail.com

Re: MK Health Alliance, LLC - Case No. DCC25-0000138  
Default Decision and Order

Dear MK Health Alliance, LLC, and Mr. Mullins:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent MK Health Alliance, LLC, in default and therefore will proceed as described in the attached Default Decision and Order.

Be advised that Government Code section 11520, subdivision (c), provides that Respondent may serve a written motion requesting that the Decision be vacated upon stating the ground relied on within seven (7) days after service of the Decision. The Department in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

Barring such a timely motion, the attached Default Decision and Order involving MK Health Alliance, LLC, will become effective on August 29, 2025.

Sincerely,



Douglas Smurr  
Assistant General Counsel

Enclosure

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

## In the Matter of the Accusation Against:

Case No. DCC25-0000138

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

## DEFAULT DECISION AND ORDER

## **Cannabis Retailer Non-Storefront License No. C9-0000115-LIC**

[Gov. Code, §11520]

## Respondent.

## **FINDINGS OF FACT**

1. On or about June 19, 2025, Complainant Evelyn Schaeffer, in her official capacity as the Deputy Director of the Compliance Division of the Department of Cannabis Control, filed Accusation No. DCC25-0000138 against MK Health Alliance LLC (Respondent) with Brandon Mullins as Owner (Owner). (A copy of the Accusation is attached as Exhibit A.)

2. On or about June 20, 2019, the Department of Cannabis Control (Department) issued Cannabis Retailer Non-Storefront License No. C9-0000115-LIC to Respondent. The Cannabis Retailer Non-Storefront License was in full force and effect at all times relevant to the charges brought in Accusation No. DCC25-0000138 and expired on July 10, 2025. This lapse in licensure, however, pursuant to Business and Professions Code section 26031, subdivision (d),

1 does not deprive the Department of its authority to institute or continue this disciplinary  
2 proceeding.

3       3. On or about June 23, 2025, Respondent was served by Certified and First Class Mail  
4 copies of the Accusation No. DCC25-0000138, Statement to Respondent, Notice of Defense,  
5 Request for Discovery and Discovery Statutes (Government Code sections 11507.5, 11507.6, and  
6 11507.7) at Respondent's address of record which, pursuant to California Code of Regulations,  
7 title 4, section 15002, is required to be reported and maintained with the Department.  
8 Respondent's address of record was and is: 4401 San Leandro Street, Unit #27, Oakland, CA  
9 94601.

10     4. Service of the Accusation was effective as a matter of law under the provisions of  
11 Government Code section 11505(c) and/or Business and Professions Code section 124.

12     5. Government Code section 11506(c) states, in pertinent part:

13               (c) The respondent shall be entitled to a hearing on the merits if the respondent  
14 files a notice of defense . . . and the notice shall be deemed a specific denial of all  
15 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense  
16 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its  
17 discretion may nevertheless grant a hearing.

18     6. The Department takes official notice of its records and the fact that Respondent failed  
19 to file a Notice of Defense within 15 days after service upon them of the Accusation, and  
20 therefore waived its right to a hearing on the merits of Accusation No. DCC25-0000138.

21     7. California Government Code section 11520(a) states, in pertinent part:

22               (a) If the respondent either fails to file a notice of defense . . . or to appear at  
23 the hearing, the agency may take action based upon the respondent's express  
24 admissions or upon other evidence and affidavits may be used as evidence without  
25 any notice to respondent . . .

26     8. Pursuant to its authority under Government Code section 11520, the Department finds  
27 Respondent is in default. The Department will take action without further hearing and, based on  
28 the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this  
matter, finds that the charges and allegations in Accusation No. DCC25-0000138, are separately  
and severally, found to be true and correct by clear and convincing evidence.

9. The Department finds that the actual costs for Investigation and Enforcement are \$16,225.73 as of July 23, 2025.

## **DETERMINATION OF ISSUES**

1. Based on the foregoing findings of fact, Respondent MK Health Alliance LLC, with Brandon Mullins as Owner, has subjected its Cannabis Retailer Non-Storefront License No. C9-0000115-LIC to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Department of Cannabis Control is authorized to revoke Respondent's Cannabis Retailer Non-Storefront License based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

- a. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15415, subdivision (a), [Delivery of cannabis goods by a non-employee].
- b. Violation of Business and Professions Code section 26055, subdivision (c), [Unauthorized alteration of the licensed premises].
- c. Violation of Business and Professions Code section 26140 and Title 4 of the California Code of Regulations, section 15400, subdivisions (a) through (c), [Premises access to persons under 21 years of age].
- d. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1), [Failure to reconcile on-hand inventory at least once every 30 days].
- e. Violation of Business and Professions Code section 26160, subdivisions (a) through (d), and Title 4 of the California Code of Regulations, section 15037, subdivisions (a)(1), (a)(2), (a)(6), (a)(7), and (b), [Failure to comply with record retention requirements].

- f. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15418, subdivision (g), [Failure to provide required documentation regarding delivered cannabis goods].
- g. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15424, subdivisions (a) and (c), [Failure to account for all of its inventory and provide corresponding records to the Department upon request].
- h. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15047.2, subdivisions (b) and (c), [Failure to record accurate and complete data into the CCTT system].
- i. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 17801, [Failure to correct violations stated in a Notice to Comply].
- j. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15417, subdivisions (a) and (d), [Delivery vehicle requirements].
- k. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15042, subdivisions (b) through (d), [Failure to restrict access of a licensed premises to employees and authorized individuals; failure to escort non-employees within the licensed premises].

## **ORDER**

IT IS SO ORDERED that Cannabis Retailer Non-Storefront License No. C9-0000115-LIC, issued to Respondent MK Health Alliance LLC, with Brandon Mullins as Owner, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within

seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on August 29, 2025.

It is SO ORDERED, July 30, 2025.

**Douglas Smurr  
Assistant General Counsel  
FOR THE DEPARTMENT OF CANNABIS CONTROL**

Default Decision and ORDER - LIC.docx  
DOJ Matter ID: LA2025801705

**Attachment:**  
**Exhibit A: Accusation**

# Exhibit A

## Accusation

(MK HEALTH ALLIANCE LLC; BRANDON MULLINS, OWNER)

ROB BONTA  
Attorney General of California  
GREGORY M. CRIBBS  
Supervising Deputy Attorney General  
MATTHEW S. BEASLEY  
Deputy Attorney General  
State Bar No. 288070  
300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
Telephone: (213) 269-6705  
Facsimile: (916) 731-2126  
E-mail: Matthew.Beasley@doj.ca.gov  
*Attorneys for Complainant*

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

**In the Matter of the Accusation Against:**

Case No. DCC25-0000138

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

## ACCUSATION

**Cannabis Retailer Non-Storefront License  
No. C9-0000115-LIC**

## Respondent.

## PARTIES

1. Evelyn Schaeffer (Complainant) brings this Accusation solely in her official capacity as the Deputy Director of the Compliance Division of the Department of Cannabis Control (Department).

2. On or about June 20, 2019, the Department issued Cannabis Retailer Non-Storefront License C9-0000115-LIC to MK Health Alliance LLC (Respondent) with Brandon Mullins as Owner (Owner Mullins). The Cannabis Retailer Non-Storefront License was in full force and effect at all times relevant to the charges brought herein and will expire on June 19, 2025, unless renewed.

## **PROCEDURAL HISTORY**

3. On June 9, 2025, an Administrative Law Judge with the Office of Administrative Hearings, presiding by delegation of the Department, issued an interim order, pursuant to Business and Professions Code section 494, subdivision (h), suspending Cannabis Retailer Non-Storefront License C9-0000115-LIC. The interim order will remain in effect, pending a full determination whether Respondent has violated the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), or upon further order by the Department in this matter.

## **JURISDICTION**

3. This Accusation is brought before the Director of the Department, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 26010 of the Code states:

There is in the Business, Consumer Services, and Housing Agency, the Department of Cannabis Control under the supervision and control of a director. The director shall administer and enforce the provisions of this division related to the department.

5. Section 26010.5, subdivision (d), of the Code states:

The department has the power, duty, purpose, responsibility, and jurisdiction to regulate commercial cannabis activity as provided in this division.

6. Section 26012, subdivision (a), of the Code states:

It being a matter of statewide concern, except as otherwise authorized in this division, the department shall have the sole authority to create, issue, deny, renew, discipline, condition, suspend, or revoke licenses for commercial cannabis activity.

7. Section 26013, subdivision (a), of the Code states:

The department shall make and prescribe reasonable rules and regulations as may be necessary to implement, administer, and enforce its duties under this division in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code. Those rules and regulations shall be consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of Marijuana Act.

三

11

1       8. Section 26031 of the Code states:

2           (a) The department may suspend, revoke, place on probation with terms and  
3           conditions, or otherwise discipline licenses issued by the department and fine a  
4           licensee, after proper notice and hearing to the licensee, except as provided in Section  
5           26031.01, if the licensee is found to have committed any of the acts or omissions  
6           constituting grounds for disciplinary action. The disciplinary proceedings under this  
7           chapter shall be conducted in accordance with Chapter 5 (commencing with Section  
8           11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director  
9           shall have all the powers granted therein.

10           ...

11           (c) The department may take disciplinary action against a licensee for any  
12           violation of this division when the violation was committed by the licensee's officers,  
13           directors, owners, agents, or employees while acting on behalf of the licensee or  
14           engaged in commercial cannabis activity.

15           (d) The suspension or expiration of a license issued by the department, or its  
16           suspension, forfeiture, or cancellation by order of the department or by order of a  
17           court of law, or its surrender without the written consent of the department, shall not,  
18           during any period in which it may be renewed, restored, reissued, or reinstated,  
19           deprive the department of its authority to institute or continue a disciplinary  
20           proceeding against the licensee upon any ground provided by law or to enter an order  
21           suspending or revoking the license or otherwise taking disciplinary action against the  
22           licensee on any such ground.

23       9. Section 26034 of the Code states:

24           All accusations against licensees shall be filed by the department within five  
25           years after the performance of the act or omission alleged as the ground for  
26           disciplinary action; provided, however, that the foregoing provision shall not  
27           constitute a defense to an accusation alleging fraud or misrepresentation as a ground  
28           for disciplinary action. The cause for disciplinary action in that case shall not be  
29           deemed to have accrued until discovery, by the department, of the facts constituting  
30           the fraud or misrepresentation, and, in that case, the accusation shall be filed within  
31           five years after that discovery.

32           **STATUTORY PROVISIONS**

33       10. Section 26030 of the Code states:

34           Grounds for disciplinary action include, but are not limited to, all of the  
35           following:

36           (a) Failure to comply with the provisions of this division or any rule or  
37           regulation adopted pursuant to this division.

38           ...

39           (c) Any other grounds contained in regulations adopted by the department  
40           pursuant to this division....

11. Section 26055 of the Code states, in pertinent part:

2       ...

3       (c) A licensee shall not change or alter the premises in a manner which  
4       materially or substantially alters the premises, the usage of the premises, or the mode  
5       or character of business operation conducted from the premises, from the plan  
6       contained in the diagram on file with the application, unless and until written  
7       approval by the department has been obtained. For purposes of this section, material  
8       or substantial physical changes of the premises, or in the usage of the premises, shall  
9       include, but not be limited to, a substantial increase or decrease in the total area of the  
10       licensed premises previously diagrammed, or any other physical modification  
11       resulting in substantial change in the mode or character of business operation....

12. Section 26140 of the Code provides, in pertinent part, that an A-licensee shall not  
13       allow any person under 21 years of age on its premises.<sup>1</sup>

14. Section 26160 of the Code states:

15       (a) A licensee shall keep accurate records of commercial cannabis activity.

16       (b) All records related to commercial cannabis activity as defined by the  
17       department shall be maintained for a minimum of seven years.

18       (c) The department may examine the records of a licensee and inspect the  
19       premises of a licensee as the department, or a state or local agency, deems necessary  
20       to perform its duties under this division. All inspections and examinations of records  
21       shall be conducted during standard business hours of the licensed facility or at any  
22       other reasonable time. Licensees shall provide and deliver records to the department  
23       upon request.

24       (d) Licensees shall keep records identified by the department on the premises of  
25       the location licensed. The department may make any examination of the records of  
26       any licensee. Licensees shall also provide and deliver copies of documents to the  
27       department upon request....

## 28       REGULATORY PROVISIONS

29. Title 4 of the California Code of Regulations, section 15037, states:

30       (a) Licensees must keep and maintain records in connection with the licensed  
31       commercial cannabis business. Records must be kept for at least seven years from the  
32       date of creation, unless a shorter time is specified. Records include, but are not  
33       limited to:

34       (1) Financial records including, but not limited to, bank statements, sales

35       <sup>1</sup> An “‘A-licensee’ means any person holding a license under this division for cannabis or  
36       cannabis products that are intended for adults who are 21 years of age and older and who do not  
37       possess a physician’s recommendation, or are intended for use on, or consumption by, animals.”  
38       (Bus. & Prof. Code, § 26001, subd. (b).)

1 invoices, receipts, tax records, and all records required by the California Department  
2 of Tax and Fee Administration (formerly Board of Equalization) under title 18,  
3 California Code of Regulations, sections 1698 and 4901.

4 (2) Personnel records, including each employee's full name, Social Security  
5 number or individual taxpayer identification number, date employment begins, and  
6 date of termination of employment, if applicable.

7 ...

8 (6) All other documents prepared or executed by an owner or their  
9 employees or assignees in connection with the licensed commercial cannabis  
10 business.

11 (7) Records required by the Act or this division.

12 (b) Records must be kept in a manner that allows the records to be produced for  
13 the Department in either hard-copy or electronic form....

14 15. Title 4 of the California Code of Regulations, section 15042, states, in pertinent part:

16 ...

17 (b) Licensees shall ensure that only employees of the licensee and other  
18 authorized individuals access the licensed premises.

19 (c) For the purpose of this section, "authorized individuals" include outside  
20 vendors, contractors, or other individuals conducting business that requires access to  
21 the licensed premises.

22 (d) An individual who enters the licensed premises and is not employed by the  
23 licensee shall be escorted by an employee of the licensee at all times while within the  
24 licensed premises....

25 16. Title 4 of the California Code of Regulations, section 15044, states, in pertinent part:

26 (a) Each licensed premises shall have a digital video surveillance system with a  
27 minimum camera resolution of 1280 x 720 pixels on the licensed premises. This  
28 requirement does not apply to a licensed premises authorized exclusively for  
cultivation activities or the cultivation area of a licensed microbusiness premises.

...  
\\\\

(i) Surveillance recordings are subject to inspection by the Department and  
shall be kept in a manner that allows the Department to view and obtain copies of the  
recordings at the licensed premises immediately upon request. The licensee shall also  
send or otherwise provide copies of the recordings to the Department upon request  
within the time specified by the Department....

\\\\

\\\\

\\\\

1           17. Title 4 of the California Code of Regulations, section 15047.2, states, in pertinent  
2           part:

3           ...

4           (b) All commercial cannabis activity shall be accurately recorded in the track  
5           and trace system.

6           (c) A licensee is responsible for the accuracy and completeness of all data and  
7           information entered into the track and trace system. The licensee is responsible for all  
8           actions taken by the designated account manager or other account users while  
9           performing track and trace activities....

10          18. Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1) states:

11          (a) The license shall review the information recorded in the track and trace  
12           system at least once every 30 calendar days to ensure its accuracy, including, at a  
13           minimum:

14          (1) Reconciling on-hand inventory of cannabis and cannabis product with  
15           the records in the track and trace system....

16          19. Title 4 of the California Code of Regulations, section 15400, states:

17          (a) Access to the licensed premises of a retailer with only an A-designation  
18           shall be limited to individuals who are at least 21 years of age.

19          (b) Access to the licensed premises of a retailer with only an M-designation  
20           shall be limited to individuals who are at least 18 years of age and have a valid  
21           physician's recommendation for medicinal cannabis, and individuals who are at least  
22           21 years of age.

23          (c) Access to the licensed premises of a retailer with both an A- designation and  
24           an M- designation may include persons identified in subsections (a) and (b) of this  
25           section.

26          20. Title 4 of the California Code of Regulations, section 15415, states, in pertinent part:

27          (a) All deliveries of cannabis goods shall be performed by a delivery employee  
28           who is directly employed by a licensed retailer....

29          21. Title 4 of the California Code of Regulations, section 15417, states:

30          (a) A licensed retailer's delivery employee, carrying cannabis goods for  
31           delivery, shall only travel in an enclosed motor vehicle. Any vehicle used in the  
32           delivery of cannabis goods shall be operated by a delivery employee of the licensee.  
33           A vehicle used in the delivery of cannabis goods shall not have any marking or other  
34           indications on the exterior of the vehicle that may indicate that the delivery employee  
35           is carrying cannabis goods for delivery. Only the licensee or an employee of the  
36           retailer licensee for whom delivery is being performed shall be in the delivery  
37           vehicle.

1           ...

2           (d) A vehicle used for the delivery of cannabis goods shall be outfitted with a  
3           dedicated Global Positioning System (GPS) device for identifying the geographic  
4           location of the delivery vehicle and recording a history of all locations traveled to by  
5           the delivery employee while engaged in delivery. A dedicated GPS device must be  
6           owned by the licensee and used for delivery only. The device shall be either  
7           permanently or temporarily affixed to the delivery vehicle and shall remain active and  
8           inside of the delivery vehicle at all times during delivery. At all times, the licensed  
9           retailer shall be able to identify the geographic location of all delivery vehicles that  
10          are making deliveries for the licensed retailer and document the history of all  
11          locations traveled to by a delivery employee while engaged in delivery. A licensed  
12          retailer shall provide this information to the Department upon request. The history of  
13          all locations traveled to by a delivery employee while engaging in delivery shall be  
14          maintained by the licensee for a minimum of 90 days....

15          22. Title 4 of the California Code of Regulations, section 15418, subdivision (g), states:

16           10          (g) Immediately upon request by the Department or any law enforcement  
17           officer, the licensed retailer's delivery employee shall provide:

18           11          (1) The delivery inventory ledgers from the time the licensed retailer's  
19           delivery employee left the licensed premises up to the time of the request;

20           13          (2) All delivery request receipts for cannabis goods carried by the delivery  
21           employee, in the delivery vehicle, or any deliveries that have already been made to  
22           customers; and

23           15          (3) The log of all stops from the time the licensed retailer's delivery  
24           employee left the licensed premises up to the time of the request.

25          23. Title 4 of the California Code of Regulations, section 15424, states:

26           18          (a) A licensed retailer shall be able to account for all of its inventory.

27           19          ...

28           20          (c) The result of inventory reconciliation shall be retained in the licensed  
29           retailer's records and shall be made available to the Department upon request....

30          22. Title 4 of the California Code of Regulations, section 17801, states:

31           23          (a) The Department may issue a Notice to Comply to a licensee for violation(s)  
32           of the Act or this division discovered during an investigation or audit or observed  
33           during an inspection.

34           25          (b) The Notice to Comply shall be in writing and describe the nature and facts  
35           of each violation, including a reference to the statute or regulation violated, and may  
36           indicate the manner in which the licensee must correct the violation(s) to achieve  
37           compliance.

38           28          (c) The Department may serve the Notice to Comply personally, by email, or by  
39           mail to the licensee or an employee, agent, or person delegated by the licensee to

1 accept notice.

2 (d) The licensee shall sign and return the Notice to Comply and describe how  
3 compliance was achieved within 30 calendar days after the date of personal service or  
4 the date of emailing or mailing of the notice or a different date specified by the  
5 Department. The Department may also require the licensee to provide a plan for  
6 review and approval by the Department on a case-by-case basis.

5 (e) Failure to correct the violation(s) in the Notice to Comply may result in  
6 disciplinary action.

## 7 **COST RECOVERY**

8 25. Section 26031.1 of the Code states:

9 (a) Except as otherwise provided by law, in an order issued in resolution of a  
10 disciplinary proceeding before the department, the administrative law judge, upon  
11 request, may direct a licensee found to have committed a violation to pay a sum not to  
12 exceed the reasonable costs of the investigation and enforcement of the case.

13 (b) A certified copy of the actual costs, or a good faith estimate of costs where  
14 actual costs are not available, signed by the department or its designated  
15 representative shall be *prima facie* evidence of reasonable costs of investigation and  
16 prosecution of the case. The costs shall include the amount of investigative and  
17 enforcement costs up to the date of the hearing, including, but not limited to, charges  
18 imposed by the Attorney General.

19 (c) The administrative law judge shall make a proposed finding of the amount  
20 of reasonable costs of investigation and prosecution of the case when requested  
21 pursuant to subdivision (a). The finding of the administrative law judge with regard to  
22 costs shall not be reviewable by the department to increase the cost award. The  
23 department may reduce or eliminate the cost award, or remand to the administrative  
24 law judge if the proposed decision fails to make a finding on costs requested pursuant  
25 to subdivision (a).

19 (d) If an order for recovery of costs is made and timely payment is not made as  
20 directed in the department's decision, the department may enforce the order for  
21 repayment in any appropriate court. This right of enforcement shall be in addition to  
22 any other rights the department may have as to any licensee to pay costs.

23 (e) In any action for recovery of costs, proof of the department's decision shall  
24 be conclusive proof of the validity of the order of payment and the terms for payment.

25 (f)(1) Except as provided in paragraph (2), the department shall not renew or  
26 reinstate the license of any licensee who has failed to pay all of the costs ordered  
27 under this section.

25 (2) Notwithstanding paragraph (1), the department may, in its discretion,  
26 conditionally renew or reinstate for a maximum of one year the license of any  
27 licensee who demonstrates financial hardship and who enters into a formal agreement  
with the department to reimburse the department within that one-year period for the  
unpaid costs.

28 (g) All costs recovered under this section shall be considered a reimbursement

1 for costs incurred and shall be deposited into the Cannabis Control Fund to be  
2 available upon appropriation by the Legislature.

3 (h) Nothing in this section shall preclude the department from including the  
4 recovery of the costs of investigation and enforcement of a case in any stipulated  
5 settlement.

6 **FACTUAL ALLEGATIONS**

7 26. On January 15, 2025, Department investigators performed a regulatory compliance  
8 inspection at Respondent's licensed premises. When Department investigators announced  
9 themselves, they were greeted by Owner Mullins. Owner Mullins told investigators that his wife  
10 and daughter were inside the premises, and that he needed a minute. Shortly thereafter, an adult  
woman and a small child, who investigators estimated looked approximately two years old,  
walked out the front door of the premises.

11 27. Department investigators then entered the premises and discovered evidence that  
12 Owner Mullins' wife and daughter had been living there. In addition, Owner Mullins admitted  
13 that his family had been "staying" at the premises.

14 28. Department investigators also discovered that Respondent had made unapproved  
15 modifications to the physical layout of the licensed premises.

16 29. Respondent's CCTT records reported that, at the time of the inspection, Respondent  
17 had 4,952 cannabis packages at the premises. However, during the inspection Department  
18 investigators found that Respondent only had approximately 200 cannabis packages at the  
19 premises.

20 30. Department investigators asked Owner Mullins if he had reconciled Respondent's  
21 physical inventory with inventory being reported to CCTT and Owner Mullins admitted that  
22 Respondent did not reconcile the physical inventory with that reported in CCTT.

23 31. Department investigators also asked Owner Mullins if Respondent was recording  
24 customer sales in Respondent's CCTT account and Owner Mullins admitted that he was not. In  
25 addition, after requested by investigators, Respondent was unable to provide the Department with  
26 a log of customer sales, retailer delivery ledgers, sales delivery manifests, or receipts of sales.

27 32. During the inspection, Department investigators also discovered that Respondent's  
28 wife, and a man that Owner Mullins identified as his friend "Ricky," made deliveries for

1 Respondent. However, neither Owner Mullins' wife, nor Ricky, are employees of Respondent,  
2 and Respondent did not have employee records for either.

3       33. Department investigators requested access to the licensed premises' video  
4 surveillance system footage, but Owner Mullins stated that he lost the key to the surveillance  
5 system lock box and did not have access to the surveillance footage or the surveillance system.  
6 Instead, he was utilizing a Ring camera system. Ring surveillance footage reviewed by  
7 Department investigators showed Ricky was at the licensed premises alone, fulfilling orders, and  
8 staying overnight at the licensed premises since the end of October 2024, the entire length of time  
9 the Ring video surveillance camera retained historical recordings. Department investigators also  
10 observed, via the Ring video surveillance camera, that Owner Mullins, his wife, and the child  
11 were staying overnight at Respondent's licensed premises.

12       34. On January 17, 2025, Department investigators emailed Owner Mullins regarding a  
13 request for global positioning system (GPS) history of delivery vehicles, sales records, delivery  
14 ledgers and delivery manifests, delivery drivers' employment records, and video surveillance  
15 footage for the 90-days preceding the January 15, 2025, inspection. Owner Mullins was  
16 instructed to submit the requested documentation by January 21, 2025.

17       35. In addition, the Department emailed Owner Mullins on January 17, 2025, a Notice to  
18 Comply (NTC) to Respondent for violations observed during the January 15, 2025, inspection of  
19 the licensed premises. The NTC instructed Respondent to submit the requested records and  
20 provide a corrective plan, if needed, no later than January 21, 2025.

21       36. On January 21, 2025, the Department received an email response from Owner  
22 Mullins which included incomplete or insufficient sales records and GPS data. The sales records  
23 provided by Owner Mullins did not reflect the Unique Identifier (UID) numbers or product  
24 descriptions for the sold items or the actual time of deliveries. The GPS data provided inadequate  
25 information to determine the location of completed cannabis sales. The Department requested,  
26 but did not receive, the delivery ledgers and manifests, delivery drivers' employee records, or the  
27 video surveillance footage for the 90-day period preceding the inspection.

37. To date, Owner Mullins has neither complied with the NTC's requirements, nor produced the remaining records or video surveillance footage requested on January 17, 2025.

## **FIRST CAUSE FOR DISCIPLINE**

## (Delivery of Cannabis Goods by a Non-Employee)

38. Respondent is subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15415, subdivision (a), requiring that all deliveries of cannabis goods be performed by a delivery employee who is directly employed by a licensed retailer, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **SECOND CAUSE FOR DISCIPLINE**

**(Unauthorized Alteration of the Licensed Premises)**

39. Respondent is further subject to disciplinary action under Code section 26055, subdivision (c), for its material or substantial alteration of the licensed premises without written approval from the Department, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

### **THIRD CAUSE FOR DISCIPLINE**

(Premises Access to Persons Under 21 Years of Age)

40. Respondent is further subject to disciplinary action under Code section 26140 and Title 4 of the California Code of Regulations, section 15400, subdivisions (a) through (c), for providing access to the licensed premises to individuals who were not at least 21 years of age, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **FOURTH CAUSE FOR DISCIPLINE**

(Reconcile Inventory At Least Once Every 30 Days)

41. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1), requiring licensees to reconcile on-hand inventory

1 of cannabis and cannabis product with the records in the CCTT system at least once every 30  
2 days, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
3 incorporated by reference and realleged as if fully set forth herein.

4 **FIFTH CAUSE FOR DISCIPLINE**

5 (Record Retention Requirements)

6 42. Respondent is further subject to disciplinary action under Code section 26160,  
7 subdivisions (a) through (d), and Title 4 of the California Code of Regulations, section 15037,  
8 subdivisions (a)(1), (a)(2), (a)(6), (a)(7), and (b), for noncompliance with record retention  
9 requirements, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
10 incorporated by reference and realleged as if fully set forth herein.

11 **SIXTH CAUSE FOR DISCIPLINE**

12 (Documentation Regarding Cannabis Goods Carried During Delivery)

13 43. Respondent is further subject to disciplinary action under Code section 26030,  
14 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
15 Regulations, section 15418, subdivision (g), requiring a licensee to provide certain documentation  
16 regarding cannabis goods delivered during delivery, as more particularly alleged in paragraphs 26  
17 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth  
18 herein.

19 **SEVENTH CAUSE FOR DISCIPLINE**

20 (Inventory Reconciliation)

21 44. Respondent is further subject to disciplinary action under Code section 26030,  
22 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
23 Regulations, section 15424, subdivisions (a) and (c), requiring a licensed retailer to be able to  
24 account for all of its inventory and provide corresponding records to the Department upon  
25 request, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
26 incorporated by reference and realleged as if fully set forth herein.

27 \\\

28 \\\

## **EIGHTH CAUSE FOR DISCIPLINE**

### (Inaccurate/Incomplete Recording of Data into CCTT System)

3       45. Respondent is further subject to disciplinary action under Code section 26030,  
4 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
5 Regulations, section 15047.2, subdivisions (b) and (c), requiring a licensee to record accurate and  
6 complete data into the CCTT system, as more particularly alleged in paragraphs 26 through 37,  
7 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **NINTH CAUSE FOR DISCIPLINE**

**(Respond to Notice to Comply)**

10       46. Respondent is further subject to disciplinary action under Code section 26030,  
11 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
12 Regulations, section 17801, requiring a licensee to correct the violations stated in a Notice to  
13 Comply, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
14 incorporated by reference and realleged as if fully set forth herein.

## **TENTH CAUSE FOR DISCIPLINE**

### (Delivery Vehicle Requirements)

17       47. Respondent is further subject to disciplinary action under Code section 26030,  
18 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
19 Regulations, section 15417, subdivisions (a) and (d), requiring a delivery employee of the  
20 licensee, or the licensee, to operate the vehicle used for the delivery of cannabis goods, and,  
21 requiring a licensed retailer to utilize a dedicated GPS device in its delivery vehicle, and to  
22 maintain a history of all locations traveled to by a delivery employee to while engaging in  
23 delivery for at least 90 days, as more particularly alleged in paragraphs 26 through 37, above,  
24 which are hereby incorporated by reference and realleged as if fully set forth herein.

## **ELEVENTH CAUSE FOR DISCIPLINE**

### (Premises Access Requirements)

27       48. Respondent is further subject to disciplinary action under Code section 26030,  
28 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of

Regulations, section 15042, subdivisions (b) through (d), restricting access of a licensed premises to its employees and authorized individuals and requiring non-employees to be escorted at all times by the licensee while within the licensed premises, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director of the Department issue a decision:

1. Revoking or suspending with terms and conditions and fining, the Cannabis Retailer Non-Storefront License Number C9-0000115-LIC, issued to MK Health Alliance LLC;

2. Ordering Respondent MK Health Alliance LLC to pay the Department the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1;

3. Ordering the destruction of cannabis and cannabis goods in the possession of Respondent MK Health Alliance LLC at Respondent's expense, if revocation of Cannabis Retailer Non-Storefront License Number C9-0000115-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

4 Taking such other and further action as deemed necessary and proper

DATED: June 19, 2025

Evelyn Schaeffer

EVELYN SCHAEFFER  
Deputy Director of the Compliance  
Division  
Department of Cannabis Control  
State of California  
*Complainant*

LA2025801705  
CCS Accusation.docx

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

**Cannabis Retailer Non-Storefront  
License No. C9-0000115-LIC**

Case No. DCC25-0000138

**DEFAULT DECISION INVESTIGATORY  
EVIDENCE PACKET**

[Gov. Code §11520]

Respondent.

The Default Decision Investigatory Evidence Packet in support of the Default Decision and Order in the above-entitled matter consists of the following.

**Exhibit 1:** Pleadings offered for jurisdictional purposes: Accusation No. DCC25-0000138, statement to respondent, notice of defense (two blank copies), request for discovery, discovery statutes (government code sections 11507.5, 11507.6 and 11507.7), proof of service;

**Exhibit 2:** License History Certification for MK Health Alliance LLC; Brandon Mullins, Owner Cannabis Retailer Non-Storefront License No. C9-0000115-LIC;

**Exhibit 3:** Certification of Costs by Department for Investigation and Enforcement in Case No. DCC25-0000138 dated July 23, 2025;

**Exhibit 4:** Certification of Costs by California Department of Justice for Prosecution in Case No. DCC25-0000138 dated July 24, 2025; and

**Exhibit 5:** Investigative Report (without attachments) [Case No. DCC24-0000138].

Dated: July 24, 2025

Respectfully submitted,

ROB BONTA  
Attorney General of California  
GREGORY M. CRIBBS  
Supervising Deputy Attorney General

*Matthew S. Beasley*

MATTHEW S. BEASLEY  
Deputy Attorney General  
*Attorneys for Complainant*

# Exhibit 1

Accusation No. DCC25-0000138  
Statement to Respondent  
Notice of Defense  
Request for Discovery  
Discovery Statutes, Proof of Service

1 ROB BONTA  
2 Attorney General of California  
3 GREGORY M. CRIBBS  
4 Supervising Deputy Attorney General  
5 MATTHEW S. BEASLEY  
6 Deputy Attorney General  
7 State Bar No. 288070  
8 300 So. Spring Street, Suite 1702  
9 Los Angeles, CA 90013  
10 Telephone: (213) 269-6705  
11 Facsimile: (916) 731-2126  
12 E-mail: Matthew.Beasley@doj.ca.gov  
13 *Attorneys for Complainant*

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**BEFORE THE**  
**DEPARTMENT OF CANNABIS CONTROL**  
**STATE OF CALIFORNIA**

In the Matter of the Accusation Against:  
**MK HEALTH ALLIANCE LLC;**  
**BRANDON MULLINS, OWNER**  
**4401 San Leandro Street, Unit #27**  
**Oakland, CA 94601**  
**Cannabis Retailer Non-Storefront License**  
**No. C9-0000115-LIC**

Case No. DCC25-0000138

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

Respondent.

TO RESPONDENT:

Enclosed is a copy of the Accusation that has been filed with the Department of Cannabis Control (Department), and which is hereby served on you.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the Department, represented by Deputy Attorney General Matthew S. Beasley, within fifteen (15) days after a copy of the Accusation was personally served on you or mailed to you, you will be deemed to have waived your right to a hearing in this matter and the Department may proceed upon the Accusation without a hearing and may take action thereon as provided by law.

///

///

1        The request for hearing may be made by delivering or mailing one of the enclosed forms  
2 entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in  
3 section 11506 of the Government Code, to

4  
5        **Matthew S. Beasley**  
6        **Deputy Attorney General**  
7        **300 South Spring Street, Suite 1702**  
8        **Los Angeles, CA 90013**  
9        **Email: [Matthew.Beasley@doj.ca.gov](mailto:Matthew.Beasley@doj.ca.gov)**

10      You may, but need not, be represented by counsel at any or all stages of these proceedings.

11      The enclosed Notice of Defense, if signed and filed with the Department, shall be deemed a  
12 specific denial of all parts of the Accusation, but you will not be permitted to raise any objection  
13 to the form of the Accusation unless you file a further Notice of Defense as provided in section  
14 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

15      If you file any Notice of Defense within the time permitted, a hearing will be held on the  
16 charges made in the Accusation.

17      The hearing may be postponed for good cause. If you have good cause, you are obliged to  
18 notify the Office of Administrative Hearings, 1515 Clay Street, Suite 206, Oakland, CA 94612,  
19 within ten (10) working days after you discover the good cause. Failure to notify the Office of  
20 Administrative Hearings within ten (10) days will deprive you of a postponement.

21      Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

22      If you desire the names and addresses of witnesses or an opportunity to inspect and copy  
23 the items mentioned in section 11507.6 of the Government Code in the possession, custody or  
24 control of the Department you may send a Request for Discovery to the above designated Deputy  
25 Attorney General.

26      **NOTICE REGARDING STIPULATED SETTLEMENTS**

27      It may be possible to avoid the time, expense and uncertainties involved in an  
28 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated  
settlement is a binding written agreement between you and the government regarding the matters

1 charged and the discipline to be imposed. Such a stipulation would have to be approved by the  
2 Department of Cannabis Control but, once approved, it would be incorporated into a final order.

3 Any stipulation must be consistent with the Department's established disciplinary  
4 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the  
5 Department's Disciplinary Guidelines will be provided to you on your written request to the state  
6 agency bringing this action.

7 If you are interested in pursuing this alternative to a formal administrative hearing, or if you  
8 have any questions, you or your attorney should contact Deputy Attorney General Matthew S.  
9 Beasley at the earliest opportunity.

10  
11 Dated: June 23, 2025

ROB BONTA  
Attorney General of California  
GREGORY M. CRIBBS  
Supervising Deputy Attorney General

*Matthew S. Beasley*

MATTHEW S. BEASLEY  
Deputy Attorney General  
*Attorneys for Complainant*

17  
18 LA2025801705  
19 67701180.docx  
20  
21  
22  
23  
24  
25  
26  
27  
28

1      ROB BONTA  
2      Attorney General of California  
3      GREGORY M. CRIBBS  
4      Supervising Deputy Attorney General  
5      MATTHEW S. BEASLEY  
6      Deputy Attorney General  
7      State Bar No. 288070  
8           300 So. Spring Street, Suite 1702  
9           Los Angeles, CA 90013  
10      Telephone: (213) 269-6705  
11      Facsimile: (916) 731-2126  
12      E-mail: Matthew.Beasley@doj.ca.gov  
13      *Attorneys for Complainant*

14  
15      **BEFORE THE**  
16      **DEPARTMENT OF CANNABIS CONTROL**  
17      **STATE OF CALIFORNIA**

18      In the Matter of the Accusation Against:

19      Case No. DCC25-0000138

20      **MK HEALTH ALLIANCE LLC;**  
21      **BRANDON MULLINS, OWNER**  
22      **4401 San Leandro Street, Unit #27**  
23      **Oakland, CA 94601**

24      **ACCUSATION**

25      **Cannabis Retailer Non-Storefront License**  
26      **No. C9-0000115-LIC**

27           Respondent.

28      **PARTIES**

29      1. Evelyn Schaeffer (Complainant) brings this Accusation solely in her official capacity  
30      as the Deputy Director of the Compliance Division of the Department of Cannabis Control  
31      (Department).

32      2. On or about June 20, 2019, the Department issued Cannabis Retailer Non-Storefront  
33      License C9-0000115-LIC to MK Health Alliance LLC (Respondent) with Brandon Mullins as  
34      Owner (Owner Mullins). The Cannabis Retailer Non-Storefront License was in full force and  
35      effect at all times relevant to the charges brought herein and will expire on June 19, 2025, unless  
36      renewed.

## **PROCEDURAL HISTORY**

3. On June 9, 2025, an Administrative Law Judge with the Office of Administrative Hearings, presiding by delegation of the Department, issued an interim order, pursuant to Business and Professions Code section 494, subdivision (h), suspending Cannabis Retailer Non-Storefront License C9-0000115-LIC. The interim order will remain in effect, pending a full determination whether Respondent has violated the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), or upon further order by the Department in this matter.

## **JURISDICTION**

3. This Accusation is brought before the Director of the Department, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 26010 of the Code states:

There is in the Business, Consumer Services, and Housing Agency, the Department of Cannabis Control under the supervision and control of a director. The director shall administer and enforce the provisions of this division related to the department.

5. Section 26010.5, subdivision (d), of the Code states:

The department has the power, duty, purpose, responsibility, and jurisdiction to regulate commercial cannabis activity as provided in this division.

6. Section 26012, subdivision (a), of the Code states:

It being a matter of statewide concern, except as otherwise authorized in this division, the department shall have the sole authority to create, issue, deny, renew, discipline, condition, suspend, or revoke licenses for commercial cannabis activity.

7. Section 26013, subdivision (a), of the Code states:

The department shall make and prescribe reasonable rules and regulations as may be necessary to implement, administer, and enforce its duties under this division in accordance with Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code. Those rules and regulations shall be consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of Marijuana Act.

11

11

1       8. Section 26031 of the Code states:

2           (a) The department may suspend, revoke, place on probation with terms and  
3           conditions, or otherwise discipline licenses issued by the department and fine a  
4           licensee, after proper notice and hearing to the licensee, except as provided in Section  
5           26031.01, if the licensee is found to have committed any of the acts or omissions  
6           constituting grounds for disciplinary action. The disciplinary proceedings under this  
7           chapter shall be conducted in accordance with Chapter 5 (commencing with Section  
8           11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director  
9           shall have all the powers granted therein.

10           ...

11           (c) The department may take disciplinary action against a licensee for any  
12           violation of this division when the violation was committed by the licensee's officers,  
13           directors, owners, agents, or employees while acting on behalf of the licensee or  
14           engaged in commercial cannabis activity.

15           (d) The suspension or expiration of a license issued by the department, or its  
16           suspension, forfeiture, or cancellation by order of the department or by order of a  
17           court of law, or its surrender without the written consent of the department, shall not,  
18           during any period in which it may be renewed, restored, reissued, or reinstated,  
19           deprive the department of its authority to institute or continue a disciplinary  
20           proceeding against the licensee upon any ground provided by law or to enter an order  
21           suspending or revoking the license or otherwise taking disciplinary action against the  
22           licensee on any such ground.

23       9. Section 26034 of the Code states:

24           All accusations against licensees shall be filed by the department within five  
25           years after the performance of the act or omission alleged as the ground for  
26           disciplinary action; provided, however, that the foregoing provision shall not  
27           constitute a defense to an accusation alleging fraud or misrepresentation as a ground  
28           for disciplinary action. The cause for disciplinary action in that case shall not be  
29           deemed to have accrued until discovery, by the department, of the facts constituting  
30           the fraud or misrepresentation, and, in that case, the accusation shall be filed within  
31           five years after that discovery.

32           **STATUTORY PROVISIONS**

33       10. Section 26030 of the Code states:

34           Grounds for disciplinary action include, but are not limited to, all of the  
35           following:

36           (a) Failure to comply with the provisions of this division or any rule or  
37           regulation adopted pursuant to this division.

38           ...

39           (c) Any other grounds contained in regulations adopted by the department  
40           pursuant to this division....

11. Section 26055 of the Code states, in pertinent part:

2       ...

3       (c) A licensee shall not change or alter the premises in a manner which  
4       materially or substantially alters the premises, the usage of the premises, or the mode  
5       or character of business operation conducted from the premises, from the plan  
6       contained in the diagram on file with the application, unless and until written  
7       approval by the department has been obtained. For purposes of this section, material  
8       or substantial physical changes of the premises, or in the usage of the premises, shall  
9       include, but not be limited to, a substantial increase or decrease in the total area of the  
10       licensed premises previously diagrammed, or any other physical modification  
11       resulting in substantial change in the mode or character of business operation....

12. Section 26140 of the Code provides, in pertinent part, that an A-licensee shall not  
13       allow any person under 21 years of age on its premises.<sup>1</sup>

14. Section 26160 of the Code states:

15       (a) A licensee shall keep accurate records of commercial cannabis activity.

16       (b) All records related to commercial cannabis activity as defined by the  
17       department shall be maintained for a minimum of seven years.

18       (c) The department may examine the records of a licensee and inspect the  
19       premises of a licensee as the department, or a state or local agency, deems necessary  
20       to perform its duties under this division. All inspections and examinations of records  
21       shall be conducted during standard business hours of the licensed facility or at any  
22       other reasonable time. Licensees shall provide and deliver records to the department  
23       upon request.

24       (d) Licensees shall keep records identified by the department on the premises of  
25       the location licensed. The department may make any examination of the records of  
26       any licensee. Licensees shall also provide and deliver copies of documents to the  
27       department upon request....

## 28       REGULATORY PROVISIONS

29. Title 4 of the California Code of Regulations, section 15037, states:

30       (a) Licensees must keep and maintain records in connection with the licensed  
31       commercial cannabis business. Records must be kept for at least seven years from the  
32       date of creation, unless a shorter time is specified. Records include, but are not  
33       limited to:

34       (1) Financial records including, but not limited to, bank statements, sales

35       <sup>1</sup> An “‘A-licensee’ means any person holding a license under this division for cannabis or  
36       cannabis products that are intended for adults who are 21 years of age and older and who do not  
37       possess a physician’s recommendation, or are intended for use on, or consumption by, animals.”  
38       (Bus. & Prof. Code, § 26001, subd. (b).)

1 invoices, receipts, tax records, and all records required by the California Department  
2 of Tax and Fee Administration (formerly Board of Equalization) under title 18,  
3 California Code of Regulations, sections 1698 and 4901.

4 (2) Personnel records, including each employee's full name, Social Security  
5 number or individual taxpayer identification number, date employment begins, and  
6 date of termination of employment, if applicable.

7 ...

8 (6) All other documents prepared or executed by an owner or their  
9 employees or assignees in connection with the licensed commercial cannabis  
10 business.

11 (7) Records required by the Act or this division.

12 (b) Records must be kept in a manner that allows the records to be produced for  
13 the Department in either hard-copy or electronic form....

14 15. Title 4 of the California Code of Regulations, section 15042, states, in pertinent part:

16 ...

17 (b) Licensees shall ensure that only employees of the licensee and other  
18 authorized individuals access the licensed premises.

19 (c) For the purpose of this section, "authorized individuals" include outside  
20 vendors, contractors, or other individuals conducting business that requires access to  
21 the licensed premises.

22 (d) An individual who enters the licensed premises and is not employed by the  
23 licensee shall be escorted by an employee of the licensee at all times while within the  
24 licensed premises....

25 16. Title 4 of the California Code of Regulations, section 15044, states, in pertinent part:

26 (a) Each licensed premises shall have a digital video surveillance system with a  
27 minimum camera resolution of 1280 x 720 pixels on the licensed premises. This  
28 requirement does not apply to a licensed premises authorized exclusively for  
cultivation activities or the cultivation area of a licensed microbusiness premises.

...  
\\\\

(i) Surveillance recordings are subject to inspection by the Department and  
shall be kept in a manner that allows the Department to view and obtain copies of the  
recordings at the licensed premises immediately upon request. The licensee shall also  
send or otherwise provide copies of the recordings to the Department upon request  
within the time specified by the Department....

\\\\

\\\\

\\\\

1           17. Title 4 of the California Code of Regulations, section 15047.2, states, in pertinent  
2           part:

3           ...

4           (b) All commercial cannabis activity shall be accurately recorded in the track  
5           and trace system.

6           (c) A licensee is responsible for the accuracy and completeness of all data and  
7           information entered into the track and trace system. The licensee is responsible for all  
8           actions taken by the designated account manager or other account users while  
9           performing track and trace activities....

10          18. Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1) states:

11          (a) The license shall review the information recorded in the track and trace  
12           system at least once every 30 calendar days to ensure its accuracy, including, at a  
13           minimum:

14          (1) Reconciling on-hand inventory of cannabis and cannabis product with  
15           the records in the track and trace system....

16          19. Title 4 of the California Code of Regulations, section 15400, states:

17          (a) Access to the licensed premises of a retailer with only an A-designation  
18           shall be limited to individuals who are at least 21 years of age.

19          (b) Access to the licensed premises of a retailer with only an M-designation  
20           shall be limited to individuals who are at least 18 years of age and have a valid  
21           physician's recommendation for medicinal cannabis, and individuals who are at least  
22           21 years of age.

23          (c) Access to the licensed premises of a retailer with both an A- designation and  
24           an M- designation may include persons identified in subsections (a) and (b) of this  
25           section.

26          20. Title 4 of the California Code of Regulations, section 15415, states, in pertinent part:

27          (a) All deliveries of cannabis goods shall be performed by a delivery employee  
28           who is directly employed by a licensed retailer....

29          21. Title 4 of the California Code of Regulations, section 15417, states:

30          (a) A licensed retailer's delivery employee, carrying cannabis goods for  
31           delivery, shall only travel in an enclosed motor vehicle. Any vehicle used in the  
32           delivery of cannabis goods shall be operated by a delivery employee of the licensee.  
33           A vehicle used in the delivery of cannabis goods shall not have any marking or other  
34           indications on the exterior of the vehicle that may indicate that the delivery employee  
35           is carrying cannabis goods for delivery. Only the licensee or an employee of the  
36           retailer licensee for whom delivery is being performed shall be in the delivery  
37           vehicle.

1           ...

2           (d) A vehicle used for the delivery of cannabis goods shall be outfitted with a  
3           dedicated Global Positioning System (GPS) device for identifying the geographic  
4           location of the delivery vehicle and recording a history of all locations traveled to by  
5           the delivery employee while engaged in delivery. A dedicated GPS device must be  
6           owned by the licensee and used for delivery only. The device shall be either  
7           permanently or temporarily affixed to the delivery vehicle and shall remain active and  
8           inside of the delivery vehicle at all times during delivery. At all times, the licensed  
9           retailer shall be able to identify the geographic location of all delivery vehicles that  
10          are making deliveries for the licensed retailer and document the history of all  
11          locations traveled to by a delivery employee while engaged in delivery. A licensed  
12          retailer shall provide this information to the Department upon request. The history of  
13          all locations traveled to by a delivery employee while engaging in delivery shall be  
14          maintained by the licensee for a minimum of 90 days....

15          22. Title 4 of the California Code of Regulations, section 15418, subdivision (g), states:

16           10          (g) Immediately upon request by the Department or any law enforcement  
17           officer, the licensed retailer's delivery employee shall provide:

18           11          (1) The delivery inventory ledgers from the time the licensed retailer's  
19           delivery employee left the licensed premises up to the time of the request;

20           13          (2) All delivery request receipts for cannabis goods carried by the delivery  
21           employee, in the delivery vehicle, or any deliveries that have already been made to  
22           customers; and

23           15          (3) The log of all stops from the time the licensed retailer's delivery  
24           employee left the licensed premises up to the time of the request.

25          23. Title 4 of the California Code of Regulations, section 15424, states:

26           18          (a) A licensed retailer shall be able to account for all of its inventory.

27           19          ...

28           20          (c) The result of inventory reconciliation shall be retained in the licensed  
29           retailer's records and shall be made available to the Department upon request....

30          22. Title 4 of the California Code of Regulations, section 17801, states:

31           23          (a) The Department may issue a Notice to Comply to a licensee for violation(s)  
32           of the Act or this division discovered during an investigation or audit or observed  
33           during an inspection.

34           25          (b) The Notice to Comply shall be in writing and describe the nature and facts  
35           of each violation, including a reference to the statute or regulation violated, and may  
36           indicate the manner in which the licensee must correct the violation(s) to achieve  
37           compliance.

38           28          (c) The Department may serve the Notice to Comply personally, by email, or by  
39           mail to the licensee or an employee, agent, or person delegated by the licensee to

1 accept notice.

2 (d) The licensee shall sign and return the Notice to Comply and describe how  
3 compliance was achieved within 30 calendar days after the date of personal service or  
4 the date of emailing or mailing of the notice or a different date specified by the  
5 Department. The Department may also require the licensee to provide a plan for  
6 review and approval by the Department on a case-by-case basis.

5 (e) Failure to correct the violation(s) in the Notice to Comply may result in  
6 disciplinary action.

## 7 **COST RECOVERY**

8 25. Section 26031.1 of the Code states:

9 (a) Except as otherwise provided by law, in an order issued in resolution of a  
10 disciplinary proceeding before the department, the administrative law judge, upon  
11 request, may direct a licensee found to have committed a violation to pay a sum not to  
12 exceed the reasonable costs of the investigation and enforcement of the case.

13 (b) A certified copy of the actual costs, or a good faith estimate of costs where  
14 actual costs are not available, signed by the department or its designated  
15 representative shall be *prima facie* evidence of reasonable costs of investigation and  
16 prosecution of the case. The costs shall include the amount of investigative and  
17 enforcement costs up to the date of the hearing, including, but not limited to, charges  
18 imposed by the Attorney General.

19 (c) The administrative law judge shall make a proposed finding of the amount  
20 of reasonable costs of investigation and prosecution of the case when requested  
21 pursuant to subdivision (a). The finding of the administrative law judge with regard to  
22 costs shall not be reviewable by the department to increase the cost award. The  
23 department may reduce or eliminate the cost award, or remand to the administrative  
24 law judge if the proposed decision fails to make a finding on costs requested pursuant  
25 to subdivision (a).

19 (d) If an order for recovery of costs is made and timely payment is not made as  
20 directed in the department's decision, the department may enforce the order for  
21 repayment in any appropriate court. This right of enforcement shall be in addition to  
22 any other rights the department may have as to any licensee to pay costs.

23 (e) In any action for recovery of costs, proof of the department's decision shall  
24 be conclusive proof of the validity of the order of payment and the terms for payment.

25 (f)(1) Except as provided in paragraph (2), the department shall not renew or  
26 reinstate the license of any licensee who has failed to pay all of the costs ordered  
27 under this section.

25 (2) Notwithstanding paragraph (1), the department may, in its discretion,  
26 conditionally renew or reinstate for a maximum of one year the license of any  
27 licensee who demonstrates financial hardship and who enters into a formal agreement  
with the department to reimburse the department within that one-year period for the  
unpaid costs.

28 (g) All costs recovered under this section shall be considered a reimbursement

1 for costs incurred and shall be deposited into the Cannabis Control Fund to be  
2 available upon appropriation by the Legislature.

3 (h) Nothing in this section shall preclude the department from including the  
4 recovery of the costs of investigation and enforcement of a case in any stipulated  
5 settlement.

6 **FACTUAL ALLEGATIONS**

7 26. On January 15, 2025, Department investigators performed a regulatory compliance  
8 inspection at Respondent's licensed premises. When Department investigators announced  
9 themselves, they were greeted by Owner Mullins. Owner Mullins told investigators that his wife  
10 and daughter were inside the premises, and that he needed a minute. Shortly thereafter, an adult  
woman and a small child, who investigators estimated looked approximately two years old,  
walked out the front door of the premises.

11 27. Department investigators then entered the premises and discovered evidence that  
12 Owner Mullins' wife and daughter had been living there. In addition, Owner Mullins admitted  
13 that his family had been "staying" at the premises.

14 28. Department investigators also discovered that Respondent had made unapproved  
15 modifications to the physical layout of the licensed premises.

16 29. Respondent's CCTT records reported that, at the time of the inspection, Respondent  
17 had 4,952 cannabis packages at the premises. However, during the inspection Department  
18 investigators found that Respondent only had approximately 200 cannabis packages at the  
19 premises.

20 30. Department investigators asked Owner Mullins if he had reconciled Respondent's  
21 physical inventory with inventory being reported to CCTT and Owner Mullins admitted that  
22 Respondent did not reconcile the physical inventory with that reported in CCTT.

23 31. Department investigators also asked Owner Mullins if Respondent was recording  
24 customer sales in Respondent's CCTT account and Owner Mullins admitted that he was not. In  
25 addition, after requested by investigators, Respondent was unable to provide the Department with  
26 a log of customer sales, retailer delivery ledgers, sales delivery manifests, or receipts of sales.

27 32. During the inspection, Department investigators also discovered that Respondent's  
28 wife, and a man that Owner Mullins identified as his friend "Ricky," made deliveries for

1 Respondent. However, neither Owner Mullins' wife, nor Ricky, are employees of Respondent,  
2 and Respondent did not have employee records for either.

3       33. Department investigators requested access to the licensed premises' video  
4 surveillance system footage, but Owner Mullins stated that he lost the key to the surveillance  
5 system lock box and did not have access to the surveillance footage or the surveillance system.  
6 Instead, he was utilizing a Ring camera system. Ring surveillance footage reviewed by  
7 Department investigators showed Ricky was at the licensed premises alone, fulfilling orders, and  
8 staying overnight at the licensed premises since the end of October 2024, the entire length of time  
9 the Ring video surveillance camera retained historical recordings. Department investigators also  
10 observed, via the Ring video surveillance camera, that Owner Mullins, his wife, and the child  
11 were staying overnight at Respondent's licensed premises.

12       34. On January 17, 2025, Department investigators emailed Owner Mullins regarding a  
13 request for global positioning system (GPS) history of delivery vehicles, sales records, delivery  
14 ledgers and delivery manifests, delivery drivers' employment records, and video surveillance  
15 footage for the 90-days preceding the January 15, 2025, inspection. Owner Mullins was  
16 instructed to submit the requested documentation by January 21, 2025.

17       35. In addition, the Department emailed Owner Mullins on January 17, 2025, a Notice to  
18 Comply (NTC) to Respondent for violations observed during the January 15, 2025, inspection of  
19 the licensed premises. The NTC instructed Respondent to submit the requested records and  
20 provide a corrective plan, if needed, no later than January 21, 2025.

21       36. On January 21, 2025, the Department received an email response from Owner  
22 Mullins which included incomplete or insufficient sales records and GPS data. The sales records  
23 provided by Owner Mullins did not reflect the Unique Identifier (UID) numbers or product  
24 descriptions for the sold items or the actual time of deliveries. The GPS data provided inadequate  
25 information to determine the location of completed cannabis sales. The Department requested,  
26 but did not receive, the delivery ledgers and manifests, delivery drivers' employee records, or the  
27 video surveillance footage for the 90-day period preceding the inspection.

37. To date, Owner Mullins has neither complied with the NTC's requirements, nor produced the remaining records or video surveillance footage requested on January 17, 2025.

## **FIRST CAUSE FOR DISCIPLINE**

## (Delivery of Cannabis Goods by a Non-Employee)

38. Respondent is subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15415, subdivision (a), requiring that all deliveries of cannabis goods be performed by a delivery employee who is directly employed by a licensed retailer, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **SECOND CAUSE FOR DISCIPLINE**

**(Unauthorized Alteration of the Licensed Premises)**

39. Respondent is further subject to disciplinary action under Code section 26055, subdivision (c), for its material or substantial alteration of the licensed premises without written approval from the Department, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

### **THIRD CAUSE FOR DISCIPLINE**

(Premises Access to Persons Under 21 Years of Age)

40. Respondent is further subject to disciplinary action under Code section 26140 and Title 4 of the California Code of Regulations, section 15400, subdivisions (a) through (c), for providing access to the licensed premises to individuals who were not at least 21 years of age, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **FOURTH CAUSE FOR DISCIPLINE**

(Reconcile Inventory At Least Once Every 30 Days)

41. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15051, subdivision (a)(1), requiring licensees to reconcile on-hand inventory

1 of cannabis and cannabis product with the records in the CCTT system at least once every 30  
2 days, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
3 incorporated by reference and realleged as if fully set forth herein.

4 **FIFTH CAUSE FOR DISCIPLINE**

5 (Record Retention Requirements)

6 42. Respondent is further subject to disciplinary action under Code section 26160,  
7 subdivisions (a) through (d), and Title 4 of the California Code of Regulations, section 15037,  
8 subdivisions (a)(1), (a)(2), (a)(6), (a)(7), and (b), for noncompliance with record retention  
9 requirements, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
10 incorporated by reference and realleged as if fully set forth herein.

11 **SIXTH CAUSE FOR DISCIPLINE**

12 (Documentation Regarding Cannabis Goods Carried During Delivery)

13 43. Respondent is further subject to disciplinary action under Code section 26030,  
14 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
15 Regulations, section 15418, subdivision (g), requiring a licensee to provide certain documentation  
16 regarding cannabis goods delivered during delivery, as more particularly alleged in paragraphs 26  
17 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth  
18 herein.

19 **SEVENTH CAUSE FOR DISCIPLINE**

20 (Inventory Reconciliation)

21 44. Respondent is further subject to disciplinary action under Code section 26030,  
22 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
23 Regulations, section 15424, subdivisions (a) and (c), requiring a licensed retailer to be able to  
24 account for all of its inventory and provide corresponding records to the Department upon  
25 request, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
26 incorporated by reference and realleged as if fully set forth herein.

27 \\\

28 \\\

## **EIGHTH CAUSE FOR DISCIPLINE**

### (Inaccurate/Incomplete Recording of Data into CCTT System)

3       45. Respondent is further subject to disciplinary action under Code section 26030,  
4 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
5 Regulations, section 15047.2, subdivisions (b) and (c), requiring a licensee to record accurate and  
6 complete data into the CCTT system, as more particularly alleged in paragraphs 26 through 37,  
7 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **NINTH CAUSE FOR DISCIPLINE**

**(Respond to Notice to Comply)**

10       46. Respondent is further subject to disciplinary action under Code section 26030,  
11 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
12 Regulations, section 17801, requiring a licensee to correct the violations stated in a Notice to  
13 Comply, as more particularly alleged in paragraphs 26 through 37, above, which are hereby  
14 incorporated by reference and realleged as if fully set forth herein.

## **TENTH CAUSE FOR DISCIPLINE**

### (Delivery Vehicle Requirements)

17       47. Respondent is further subject to disciplinary action under Code section 26030,  
18 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
19 Regulations, section 15417, subdivisions (a) and (d), requiring a delivery employee of the  
20 licensee, or the licensee, to operate the vehicle used for the delivery of cannabis goods, and,  
21 requiring a licensed retailer to utilize a dedicated GPS device in its delivery vehicle, and to  
22 maintain a history of all locations traveled to by a delivery employee to while engaging in  
23 delivery for at least 90 days, as more particularly alleged in paragraphs 26 through 37, above,  
24 which are hereby incorporated by reference and realleged as if fully set forth herein.

## **ELEVENTH CAUSE FOR DISCIPLINE**

### (Premises Access Requirements)

27       48. Respondent is further subject to disciplinary action under Code section 26030,  
28 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of

Regulations, section 15042, subdivisions (b) through (d), restricting access of a licensed premises to its employees and authorized individuals and requiring non-employees to be escorted at all times by the licensee while within the licensed premises, as more particularly alleged in paragraphs 26 through 37, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director of the Department issue a decision:

1. Revoking or suspending with terms and conditions and fining, the Cannabis Retailer Non-Storefront License Number C9-0000115-LIC, issued to MK Health Alliance LLC;

2. Ordering Respondent MK Health Alliance LLC to pay the Department the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1;

3. Ordering the destruction of cannabis and cannabis goods in the possession of Respondent MK Health Alliance LLC at Respondent's expense, if revocation of Cannabis Retailer Non-Storefront License Number C9-0000115-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

4. Taking such other and further action as deemed necessary and proper.

DATED: June 19, 2025

Evelyn Schaeffer

EVELYN SCHAEFFER  
Deputy Director of the Compliance  
Division  
Department of Cannabis Control  
State of California  
*Complainant*

LA2025801705  
CCS Accusation.docx

ROB BONTA  
Attorney General of California  
GREGORY M. CRIBBS  
Supervising Deputy Attorney General  
MATTHEW S. BEASLEY  
Deputy Attorney General  
State Bar No. 288070  
300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
Telephone: (213) 269-6705  
Facsimile: (916) 731-2126  
E-mail: [Matthew.Beasley@doj.ca.gov](mailto:Matthew.Beasley@doj.ca.gov)  
*Attorneys for Complainant*

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

## In the Matter of the Accusation Against:

Case No. DCC25-0000138

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

## REQUEST FOR DISCOVERY

**Cannabis Retailer Non-Storefront License  
No. C9-0000115-LIC**

## Respondent.

TO RESPONDENT:

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.

PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE  
HEREBY REQUESTED TO:

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and

2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:

1                   a.     A statement of a person, other than the Respondent, named in the  
2 initial administrative pleading, or in any additional pleading, when it is claimed that  
3 the act or omission of the Respondent as to this person is the basis for the  
4 administrative proceeding;

5                   b.     A statement pertaining to the subject matter of the proceeding made  
6 by any party to another party or persons;

7                   c.     Statements of witnesses then proposed to be called by the  
8 Respondent and of other persons having personal knowledge of the acts, omissions or  
9 events which are the basis for the proceeding, not included in (a) or (b) above;

10                  d.     All writings, including but not limited to reports of mental, physical  
11 and blood examinations and things which the Respondent now proposes to offer in  
12 evidence;

13                  e.     Any other writing or thing which is relevant and which would be  
14 admissible in evidence, including but not limited to, any patient or hospital records  
15 pertaining to the persons named in the pleading;

16                  f.     Investigative reports made by or on behalf of the Respondent  
17 pertaining to the subject matter of the proceeding, to the extent that these reports (1)  
18 contain the names and addresses of witnesses or of persons having personal  
19 knowledge of the acts, omissions or events which are the basis for the proceeding, or  
20 (2) reflect matters perceived by the investigator in the course of his or her  
21 investigation, or (3) contain or include by attachment any statement or writing  
22 described in (a) to (e), inclusive, or summary thereof.

23                  IN ADDITION, if cost recovery is requested in the pleading prayer, provide all writings  
24 which will support any objection which may be made by the Respondent, to Respondent's  
25 payment of investigation and enforcement costs to the Board.

26                  For the purpose of this Request for Discovery, "statements" include written statements by  
27 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical

1 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or  
2 summaries of these oral statements.

3 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery  
4 should be deemed to authorize the inspection or copying of any writing or thing which is  
5 privileged from disclosure by law or otherwise made confidential or protected as attorney's work  
6 product.

7 Your response to this Request for Discovery should be directed to the undersigned attorney  
8 for the Complainant at the address on the first page of this Request for Discovery within 30 days  
9 after service of the Accusation.

10 Failure without substantial justification to comply with this Request for Discovery may  
11 subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the  
12 Government Code.

14 Dated: June 23, 2025

15 ROB BONTA  
16 Attorney General of California  
17 GREGORY M. CRIBBS  
18 Supervising Deputy Attorney General

19 *Matthew S. Beasley*

20 MATTHEW S. BEASLEY  
21 Deputy Attorney General  
22 *Attorneys for Complainant*

23 LA2025801705  
24 67701180.docx

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

**Cannabis Retailer Non-Storefront License  
No. C9-0000115-LIC**

Case No. DCC25-0000138

**NOTICE OF DEFENSE**

(Gov. Code §§ 11505 and 11506)

Respondent.

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date: \_\_\_\_\_

Print Your Name: \_\_\_\_\_

Your Signature: \_\_\_\_\_

Respondent's Mailing Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**Check one box:**

I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name: \_\_\_\_\_

Counsel's Mailing Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

**Check box if applicable:**

I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at <https://cannabis.ca.gov.at> [https://www.dca.ca.gov/about\\_us/entities.shtml](https://www.dca.ca.gov/about_us/entities.shtml).

LA2025801705  
67701180.docx

**BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**MK HEALTH ALLIANCE LLC;  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

**Cannabis Retailer Non-Storefront License  
No. C9-0000115-LIC**

Case No. DCC25-0000138

**NOTICE OF DEFENSE**

(Gov. Code §§ 11505 and 11506)

Respondent.

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date: \_\_\_\_\_

Print Your Name: \_\_\_\_\_

Your Signature: \_\_\_\_\_

Respondent's Mailing Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**Check one box:**

I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name: \_\_\_\_\_

Counsel's Mailing Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

**Check box if applicable:**

I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at <https://cannabis.ca.gov.at> [https://www.dca.ca.gov/about\\_us/entities.shtml](https://www.dca.ca.gov/about_us/entities.shtml).

LA2025801705  
67701180.docx

**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7  
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

## **SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

\*\*\*\*\*

**DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL**  
(Separate Mailings)

Case Name: **In the Matter of the Accusation against MK Health Alliance LLC, dba MedicalKush**

Case No.: **DCC25-0000138**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On **June 23, 2025**, I served the attached **STATEMENT TO RESPONDENT; ACCUSATION; NOTICE OF DEFENSE (2 COPIES); REQUEST FOR DISCOVERY; GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **STATEMENT TO RESPONDENT; ACCUSATION; NOTICE OF DEFENSE (2 COPIES); REQUEST FOR DISCOVERY; GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, addressed as follows:

MK Health Alliance LLC  
Brandon Mullins  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601  
*Respondent*

**Certified Article Number**

**9414 7266 9904 2236 9796 05**

**SENDER'S RECORD**

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on **June 23, 2025**, at Los Angeles, California.

Michelle Sandoval  
Declarant

*Michelle Sandoval*  
Signature

## Exhibit 2

License History Certification for Respondent



# Cannabis Retailer Nonstorefront License

## Adult-Use and Medicinal

**Business Name:**  
MK Health Alliance LLC

**License Number:** C9-0000115-LIC  
**License Type:** Retailer Nonstorefront  
(Delivery)

The license authorizes MK Health Alliance LLC to engage in commercial cannabis Retail Nonstorefront (Delivery) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.



**Premises Address:**  
4401 San Leandro ST, UNIT 27  
Oakland, CA 94601

**Valid:** 6/20/2019  
**Expires:** 6/19/2025

Scan to verify this  
license.



Non-Transferable

Post in Public View

# Scan to verify this license.



**Valid:**  
6/20/2019

**Expires:**  
6/19/2025

**License No:**  
C9-0000115-LIC

**Legal Business Name:**  
MK Health Alliance LLC

**Premises Address:**  
4401 San Leandro ST, UNIT 27  
Oakland, CA 94601

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at [Capotcheck.com](http://Capotcheck.com) using license number C9-0000115-LIC.

## Exhibit 3

Certification of Costs by Department for Investigation and Enforcement

**BEFORE THE**  
**DEPARTMENT OF CANNABIS CONTROL**  
**STATE OF CALIFORNIA**

## In the Matter of the Accusation Against:

Case No. DCC25-0000138

**MK HEALTH ALLICANCE LLC DBA  
MEDICAL KUSH  
BRANDON MULLINS, OWNER  
4401 San Leandro Street, Unit #27  
Oakland, CA 94601**

# DECLARATION OF TRAVIS WHITE IN SUPPORT OF REQUEST TO RECOVER INVESTIGATION AND ENFORCEMENT COSTS

**Cannabis Retailer Non-Storefront License  
No. C9-0000115-LIC**

## Respondent.

I, Travis White, declare and certify as follows:

1. I am employed as a Supervising Special Investigator (SSI) I within the Investigative Services Branch (ISB) of the Compliance Division of the Department of Cannabis Control (Department). I have personal knowledge of the facts stated herein, and, if called upon to testify, I could and would testify competently to those facts.

2. I have been designated as the Department representative to certify the costs of investigation in this case pursuant to Business and Professions Code section 26031.1. I make this certification in my official capacity as an SSI I and as a public employee pursuant to Evidence Code section 664.

3. In addition to myself, the following list of Supervising or Special Investigators were assigned to the investigation of this case, which was opened by the Department's Compliance Division on or about January 15, 2025: Jose Barajas, SSI II, Traci Lucchesi, SI, and Matthew McLean, SI.

4. In my official capacity as an SSI I, I review the costs incurred by the Department's ISB in its enforcement of the laws and regulations under the Department's jurisdiction and certify that these costs were incurred by the Department. I am familiar with the time reporting

1 system of the Department's Compliance Division for the reasonable and necessary investigative  
2 work performed on a particular case. It is the duty of supervising special investigators to keep  
3 track of the time spent and to report that time in the Department's case management system at  
4 or near the time of the tasks performed.

5 5. The summary of investigative and enforcement activities entitled MK Health Alliance  
6 - Certification of Cost Recovery was obtained from the Department's case management system  
7 and includes the details of tasks performed by Supervising and or Special Investigators as  
8 maintained in the Department's case management system. The costs related to investigative  
9 and enforcement activity include field time, research and report writing, meetings, and use of  
10 state vehicles. I hereby certify that the MK Health Alliance - Certification of Cost Recovery,  
11 attached hereto and herein incorporated by reference is a true and correct copy of the  
12 investigative and enforcement activity for this case. The summary of investigative and  
13 enforcement activity encompasses the total hours spent by the Department's ISB through July  
14 22, 2025. The summary of investigative and enforcement activities does not include tasks  
15 performed after this date.

16 6. I certify, pursuant to the provisions of the Business and Professions Code section  
17 26031.1, that to the best of my knowledge the costs of investigative and enforcement services  
18 set forth in this declaration are correct and were necessarily incurred in this case. The total  
19 hours of investigative and enforcement activities by all assigned supervising or special  
20 investigators and rates applicable to the above-entitled case are as follows:

21 a) Field Time:

22 Rate per hour: \$101.00 multiplied by 48 hours = \$4,848.00

23 b) Research and Report Writing:

24 Rate per hour: \$101.00 multiplied by 29.5 hours = \$2,979.50

25 c) Meetings:

26 Rate per hour: \$101.00 multiplied by 15 hours = \$1,515.00

27 d) Use of State Vehicles:

28 1 vehicle at \$.58 per mile multiplied by 606 miles = \$351.48

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct and that this declaration was executed in Sacramento County  
3 on July 23, 2025.

4 White,  
5 Travis@Cannabis

6 Digitally signed by White,  
7 Travis@Cannabis  
8 Date: 2025.07.23 16:42:55 -07'00'

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TRAVIS WHITE  
*Declarant*

	A	B	C	D	E	F	G	H
1	Last Name	First Name	Hourly Rate	Field Time	Research and Report	Meetings	Total Hours	Total Expense
2	Lead SI, Lucchesi	Traci	\$101.00	16	25.5	7.5	49	\$4,949.00
3	Supervising Special Investigator I, White	Travis	\$101.00	16	4	6.5	26.5	\$2,676.50
4	SI, McLean	Matt	\$101.00	16	0	1	17	\$1,717.00
5					0	0	0	\$0.00
6	<b>Total Personnel Services</b>							<b>\$9,342.50</b>
7								
8	<b>Total Personnel Services and Operating Expense</b>							<b>\$9,693.98</b>
9								
10								
11	<b>Operating Expense</b>	Count	Miles	<b>@.58 per mile</b>				
12	State Vehicles	1	606	\$351.48				
13	U-Haul Rental			\$0.00				
14	U-Haul Gas			\$0.00				
15	<b>Total Operating Expense</b>			<b>\$351.48</b>				

## Exhibit 4

Certification of Costs by California Department of Justice for Prosecution

1 ROB BONTA  
2 Attorney General of California  
3 GREGORY M. CRIBBS  
4 Supervising Deputy Attorney General  
5 MATTHEW S. BEASLEY  
6 Deputy Attorney General  
7 State Bar No. 288070  
8 300 So. Spring Street, Suite 1702  
9 Los Angeles, CA 90013  
10 Telephone: (213) 269-6705  
11 Facsimile: (916) 731-2126  
12 E-mail: Matthew.Beasley@doj.ca.gov  
13 *Attorneys for Complainant*

14  
15 **BEFORE THE  
DEPARTMENT OF CANNABIS CONTROL  
STATE OF CALIFORNIA**

16 In the Matter of the Accusation Against:

17 Case No. DCC25-0000138

18 **MK HEALTH ALLIANCE LLC;  
19 BRANDON MULLINS, OWNER**

20 **CERTIFICATION OF  
21 PROSECUTION COSTS:  
22 DECLARATION OF MATTHEW S.  
23 BEASLEY**

24 Respondent.

25 Business and Professions Code section  
26 26031.1]

27 I, MATTHEW S. BEASLEY, hereby declare and certify as follows:

28 1. I am a Deputy Attorney General employed by the California Department of Justice  
1. I am a Deputy Attorney General employed by the California Department of Justice  
2. I am assigned to the Cannabis Control Section in  
3. I have been designated as the representative to certify the costs  
4. of prosecution by DOJ and incurred by the Department of Cannabis Control in this case. I make  
5. this certification in my official capacity and as an officer of the court and as a public employee  
6. pursuant to Evidence Code section 664.

7. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance  
8. Division of the Department of Cannabis Control, in this action. I was assigned to handle this case  
9. on or about May 22, 2025.

10. Our Office's computerized case management system reflects that the following  
11. persons have also performed tasks related to this matter: Matthew S. Beasley, Deputy Attorney  
12.

1 General, Gregory M. Cribbs, Supervising Deputy Attorney General, and Helen Koh, Senior Legal  
2 Analyst.

3 4. I am familiar with the time recording and billing practices of DOJ and the procedure  
4 for charging the client agency for the reasonable and necessary work performed on a particular  
5 case. It is the duty of the time keeping employees to keep track of the time spent and to report  
6 that time in DOJ's computerized case management system at or near the time of the tasks  
7 performed.

8 5. On July 24, 2025, I requested a billing summary for this case from the Accounting  
9 Department of the DOJ. In response, on July 24, 2025, I received a document entitled "Matter  
10 Time Activity by Professional Type." I hereby certify that the Matter Time Activity by  
11 Professional Type, attached hereto as Exhibit A, and herein incorporated by reference, is a true  
12 and correct copy of the billing summary for this matter that I received from the Accounting  
13 Department. The summary includes the billing costs incurred by me, as well as other  
14 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the  
15 amount of time billed for the activity, and the billing rate by professional type. The billing  
16 summary is comprehensive of the charges by the Office to the Department of Cannabis Control  
17 through July 24, 2025. It does not include billing for tasks performed after July 24, 2025.

18 6. Based upon the time reported through July 24, 2025, as set forth in Exhibit A, DOJ  
19 has billed the Department of Cannabis Control \$6,531.75 for the time spent working on the  
20 above-entitled case.

21 7. To the best of my knowledge the items of cost set forth in this certification are correct  
22 and were necessarily incurred in this case.

23 I certify under penalty of perjury under the laws of the State of California that the foregoing  
24 is true and correct.

25 Executed on July 24, 2025.

26 */s/ Matthew S. Beasley*  
27 

---

MATTHEW S. BEASLEY  
28 Deputy Attorney General  
Declarant

## **Exhibit A**



## Matter Time Activity By Professional Type

As of Jul 24, 2025

Matter ID: LA2025801705

Date Opened: 05/22/2025

Description: MK Health Alliance LLC (ACC)

Professional Type: Attorney

Fiscal Year: 2025

Professional: Matthew S. Beasley

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605683406	7/7/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
605685696	7/8/25	CV-CCS:290	02668	Analysis/Strategy	0.25	\$228.00	\$57.00		
605686928	7/9/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
605691904	7/11/25	CV-CCS:290	02668	Other Submission/Motion/Appearance	0.25	\$228.00	\$57.00		
605691958	7/14/25	CV-CCS:290	02668	Case Management	0.50	\$228.00	\$114.00		
605696292	7/15/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
605699309	7/17/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
605703431	7/18/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
605705934	7/21/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
605709339	7/23/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
Matthew S. Beasley Totals:					2.75		\$627.00		
2025 Totals:					2.75		\$627.00		

Fiscal Year: 2024

Professional: Gregory M. Cribbs

605626068	6/2/25	CV-CCS:290	02668	Supervisory Review	1.75	\$228.00	\$399.00		6/30/25
605628370	6/3/25	CV-CCS:290	02668	Supervisory Review	0.50	\$228.00	\$114.00		6/30/25
605638152	6/10/25	CV-CCS:290	02668	Supervisory Review	0.50	\$228.00	\$114.00		6/30/25
Gregory M. Cribbs Totals:					2.75		\$627.00		

Professional: Matthew S. Beasley

605617803	5/29/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		5/31/25
605620419	5/30/25	CV-CCS:290	02668	Pleading Preparation	1.00	\$228.00	\$228.00		5/31/25
605631264	6/4/25	CV-CCS:290	02668	Pleading Preparation	1.00	\$228.00	\$228.00		6/30/25
605638379	6/10/25	CV-CCS:290	02668	Penal Code 23/ISO	0.75	\$228.00	\$171.00		6/30/25
605640308	6/10/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$228.00	\$171.00		6/30/25
605648253	6/16/25	CV-CCS:290	02668	Client Communication	0.50	\$228.00	\$114.00		6/30/25



## Matter Time Activity By Professional Type

As of Jul 24, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605655028	6/18/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		6/30/25
605655059	6/19/25	CV-CCS:290	02668	Pleading Preparation	0.25	\$228.00	\$57.00		6/30/25
605657812	6/20/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		6/30/25
605660621	6/23/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		6/30/25
605662065	6/23/25	CV-CCS:290	02668	Pleading Preparation	0.25	\$228.00	\$57.00		6/30/25
605665685	6/25/25	CV-CCS:290	02668	Research	0.25	\$228.00	\$57.00		6/30/25
605666052	6/25/25	CV-CCS:290	02668	Document Analysis	0.25	\$228.00	\$57.00		6/30/25
605673917	6/30/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		6/30/25
Matthew S. Beasley Totals:					7.50		\$1,710.00		
2024 Totals:					10.25		\$2,337.00		
Attorney Totals:					13.00		\$2,964.00		



## Matter Time Activity By Professional Type

As of Jul 24, 2025

Matter ID: LA2025801705

Date Opened: 05/22/2025

Description: MK Health Alliance LLC (ACC)

Professional Type: Paralegal

Fiscal Year: 2025

Professional: Helen Koh

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803202399	7/14/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$213.00	\$319.50		
803213809	7/24/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$213.00	\$106.50		
				Helen Koh Totals:	2.00		\$426.00		
				2025 Totals:	2.00		\$426.00		

Fiscal Year: 2024

Professional: Helen Koh

803145693	5/22/25	CV-CCS:290	02668	Case Management	0.75	\$213.00	\$159.75		5/31/25
803145924	5/22/25	CV-CCS:290	02668	Pleading Preparation	3.25	\$213.00	\$692.25		5/31/25
803147491	5/23/25	CV-CCS:290	02668	Pleading Preparation	5.00	\$213.00	\$1,065.00		5/31/25
803149983	5/27/25	CV-CCS:290	02668	Pleading Preparation	2.25	\$213.00	\$479.25		5/31/25
803150953	5/28/25	CV-CCS:290	02668	Pleading Preparation	3.50	\$213.00	\$745.50		5/31/25
				Helen Koh Totals:	14.75		\$3,141.75		
				2024 Totals:	14.75		\$3,141.75		
				Paralegal Totals:	16.75		\$3,567.75		
				LA2025801705 Totals:	29.75		\$6,531.75		

# Exhibit 5

Investigative Report (without attachments)  
DCC Case No. DCC25-0000138

**INVESTIGATION REPORT**
**Department of  
Cannabis Control**  
CALIFORNIA
**CASE INFORMATION**

Case Number <b>DCC25-0000138</b>	Date Received
License Number <b>C9-0000115-LIC</b>	Legal Business Name of Licensee or Unlicensed Party <b>MK Health Alliance LLC</b>
DBA <b>MedicalKush</b>	Premises Address <b>4401 San Leandro Street, Unit #27, Oakland, CA 94601</b>
Business Phone Number <b>(510) 621-9676</b>	Author's Name <b>Special Investigator, Traci Lucchesi</b>
Date of Incident <b>January 15, 2025</b>	Location of Incident <b>N/A</b>

**DESIGNATED RESPONSIBLE PARTY (OWNER) OR UNLICENSED PERSON(S)**

Name (First, Middle, Last) <b>Brandon Mullins</b>	Title <b>Owner/Primary Contact</b>
Address (include street, city, state, and zip code) <b>4401 San Leandro Street, Unit #27, Oakland, CA 94601</b>	
E-mail Address <a href="mailto:brandoncolemullins@gmail.com">brandoncolemullins@gmail.com</a> and <a href="mailto:brandon@medicalkush.org">brandon@medicalkush.org</a>	Phone Number <b>(925) 322-0009</b>
Miscellaneous Information  MK Health Alliance LLC, dba MedicalKush websites: <a href="http://www.medicalkush.org">www.medicalkush.org</a> and <a href="http://www.cannabismarijuanadelivery.com">www.cannabismarijuanadelivery.com</a>	

**SUMMARY**

On January 15, 2025, I, Department of Cannabis Control (Department) Special Investigator (SI) Traci Lucchesi (Lucchesi), SI Matthew McLean (McLean), and Supervising Special Investigator I (SSI I) Travis White (White), conducted an unannounced regulatory compliance inspection of the licensed premises for MK Health Alliance LLC (MK Health) dba: MedicalKush, C9-0000115-LIC, a licensed Retailer Non-Storefront, located at 4401 San Leandro Street, Unit #27, Oakland, CA 94601.

At the time of inspection, MK Health's California Cannabis Track and Trace (CCTT) account showed the licensee should have 4,952 active cannabis packages in its possession. Department staff did not observe 4,952 cannabis packages.

Department staff discovered the physical layout of the licensed premises does not match the premises diagram submitted to the Department by the licensee.

Department staff discovered individuals who are not employees of MK Health being allowed full access to the licensed premises without an escort by the licensee. The individuals are being allowed to fulfill MK Health cannabis orders and perform customer deliveries. Additionally, the individuals are being allowed to stay overnight at the licensed premises, including the owner's daughter who is a minor, approximately two years of age.

The online website for MedicalKush does not have age verification.

MK Health is not maintaining records of customer sales in its CCTT account. Additionally, sufficient records were not provided to the Department for review following the receipt of a Notice to Comply, dated January 17, 2025.



## INVESTIGATION REPORT

MK Health failed to provide sufficient historical records of the GPS delivery driver for review following the receipt of a Notice to Comply, dated January 17, 2025.

MK Health did not provide Department staff with video surveillance footage for review during the inspection or following the receipt of a Notice to Comply, dated January 17, 2025.

### BACKGROUND

MK Health's Cannabis – Retailer Non-Storefront (delivery) license, C9-0000115-LIC is active. The license was issued to MK Health on 6/20/2019 and will expire on 6/19/2025. Department licensing records show Brandon Mullins (Mullins) is the sole owner applicant and primary contact for MK Health (**Attachment A**).

Prior to my inspection of MK Health, I performed an online search and discovered two websites advertising the MK Health license Retailer Non-Storefront license number, C9-0000115-LIC.

Websites: [www.medicalkush.org](http://www.medicalkush.org) and [www.cannabismarijuanadelivery.com](http://www.cannabismarijuanadelivery.com)

### CASE NARRATIVE

On January 15, 2025, at approximately 1436 hours, I, Department of Cannabis Control (Department) Special Investigator (SI) Traci Lucchesi (Lucchesi), Supervising Special Investigator I (SSI I) Travis White (White), and SI Matthew McLean (McLean) conducted an unannounced regulatory compliance inspection of the licensed premises for MK Health Alliance LLC (MK Health), dba: MedicalKush, C9-0000115-LIC, a licensed Retail Non-Storefront located at 4401 San Leandro Street, Unit #27, Oakland.

Upon arrival at MK Health's licensed premises, SSI I White and I reviewed MK Health's C9-0000115-LIC California Cannabis Track and Trace (CCTT) account and discovered MK Health should have been in possession of 4,952 active cannabis packages, which consist of the following cannabis and cannabis product (**Attachment B**):

CCTT METRC Category	Total	Measurement Type
Capsule (weight – each)	1,111	each
Edible (volume – each)	724	each
Edible (weight – each)	30,106	each
Extract (weight – each)	3,369	each
Flower	21,916.5	gram
Flower (packaged – each)	3,182	each
Flower (packaged eighth - each)	24,758	each
Flower (packaged gram - each)	1,920	each
Flower (packaged half ounce - each)	281	each
Flower (packaged quarter - each)	1,032	each
Infused Butter/Oil (weight – each)	12	each
Other concentrate (volume – each)	12	each
Other concentrate (weight - each)	1,576	each
Pre-Roll Flower	10,415	each
Pre-Roll Infused	4,645	each
Pre-Roll Leaf	1,359	each
Shake (packaged half ounce – each)	32	each
Tincture (volume – each)	2,223	each
Tincture (weight – each)	1	each
Topical (volume – each)	349	each



## INVESTIGATION REPORT

Topical (weight – each)	345	each
Vape Cartridge (volume – each)	2,480	each
Vape Cartridge (weight – each)	9,953	each

Further review of the MK Health's CCTT account showed the license did not show any record of customer sales, METRC Retailer Delivery Ledgers or METRC Sales Delivery Manifests, since January 8, 2020, (**Attachment C**).

On location at the front door of the licensed premises, I was met by an individual who identified himself as Brandon Mullins (Mullins). Department licensing records show Mullins is the sole owner applicant and primary contact for MK Health. I introduced myself to Mullins using my state issued credentials and informed Mullins that I will be performing a regulatory compliance inspection of the premises.

Mullins informed me that he was in the process of moving from Bakersfield to Oakland and his wife and daughter were inside the premises and he needed a minute. I waited outside of the licensed premises and shortly thereafter, an adult female and small child exited through the front door. The child appeared to be approximately 2 years old. At that time, Mullins provided inside access of the premises to Department staff.

Upon entry, I walked through the entire licensed premises, I discovered the physical layout of the licensed premise did not match the premise diagram submitted to the Department by the licensee (**Attachment D**). I asked Mullins if two internal walls and a door of a room identified on the premises diagram as "Receiving Room", had been removed from the original premise, creating a larger Administrative and Common/Office area. Mullins replied by saying, "Yes."

While on site, I reviewed Department licensing records and discovered Mullins did not submit a Form DCC-LIC-027 for the modification of the MK Health licensed premises. I informed Mullins that the Department regulation requires licensees to request for approval of a physical change by submitting the Licensee Notification and Request Form DCC-LIC-027 to the Department.

Throughout the premises, I discovered a cot, bunk bed, bedding, clothes, a baby doll, toddler shoes, child's cup, makeshift shower system, cooking station, and refrigerator full of food (**Attachment E**). I asked Mullins if he was living at the licensed premises. In summary, Mullins said his family was temporarily staying at the licensed premises during his family's move from Bakersfield to Oakland. Mullins said he received the key to his family's new apartment that day and the family would no longer be staying at the licensed premises.

During the walk-through of the entire licensed premises, I did not find the estimated 4,952 active cannabis packages. I asked Mullins if he was storing cannabis packages in a location that I had not inspected. Mullins replied by saying, "No. Everything is stored inside the caged area." I asked Mullins if he was reconciling the physical inventory to the inventory being recorded in MK Health's CCTT account. Mullins said that he was not.

Prior to my inspection of MK Health, I performed an online search and discovered two websites advertising the MK Health license Retailer Non-Storefront license number, C9-0000115-LIC. The websites are [www.medicalkush.org](http://www.medicalkush.org) and [www.cannabismarijuandalivery.com](http://www.cannabismarijuandalivery.com). I observed hard copies of MedicalKush customer orders and cannabis goods on a table (**Attachment F**). I inventoried the cannabis goods and discovered that they matched the product description and quantity printed on each customer order sheet. I asked Mullins if he was fulfilling online orders from the MedicalKush website [www.medicalkush.org](http://www.medicalkush.org) or [www.cannabismarijuandalivery.com](http://www.cannabismarijuandalivery.com)? Mullins replied by saying, "Yes. I was just getting ready to deliver those orders on the table."

I asked Mullins if he was recording customer sales in MK Health's CCTT account. Mullins replied by saying that he uses a point-of-sale system called "Magento" to track sales. I asked Mullins to provide me with a log of customer sales, retailer delivery ledgers and sales delivery manifests or receipt of sales. Mullins could not



## INVESTIGATION REPORT

provide the requested records. I informed Mullins that per Department regulation, the licensee is responsible for maintaining records in connection with MK Health's commercial cannabis business. I further stated to Mullins that the records must be kept in a manner that allows the records to be produced for Department staff to inspect. Mullins acknowledged that he was not recording the information in MK Health's CCTT account.

During the inspection I asked Mullins to show me MK Health's website. When the website appeared on his desktop monitor, it did not ask for verification of age (**Attachment G**). I asked Mullins if he was aware that Department regulation requires that it use age affirmation to verify if the individual is 21 years of age or older. Mullins initially said that age verification on the website was not required, and the regulation was a "grey area". SI McLean and SSI I White read the California Code Regulation, title 4, code section 15041. Age Verification in Advertising to Mullins. Mullins continued to disagree with the requirement to add age verification and said he would not be adding the age verification to the MK Health websites because "it messed with the online search algorithms." SSI I White attempted to further explain the purpose of the regulation, but Mullins did not change his stance on the discussion. To date, the MK Health websites do not contain an age verification process.

I observed a monitor, which displayed a vehicle tracking system named "Tookan." I asked Mullins to provide me with access to view MK Health's delivery drivers and their location. Mullins stated that he was the only driver. The Tookan system displayed the driver's name, the customer address, if the task had been completed, assigned, or delayed, and a map (**Attachment H**).

While looking at customer order requests in the Tookan system, I observed two additional driver names with what appeared to be identification photographs other than Mullins. The drivers were identified in Tookan with the photographs as "Auel" and "Ricky". I asked if Auel and Ricky were employed by MK Health. Mullins said they were not. I asked Mullins if Auel and Ricky were making deliveries for MK Health. Mullins replied by saying, "sometimes", in contradiction to Mullins previous statement that he was the only driver. Mullins further stated that Auel was his wife, and Ricky was a long-time friend who Mullins was helping out because Ricky did not have a job." I asked Mullins how Ricky was being paid and how much. Mullins said that he wasn't paying Ricky, Ricky was helping him out. I asked Mullins to provide me with employee records for Auel and Ricky. Mullins said he did not have them.

During the inspection, I asked Mullins to provide me with access to review the premises video surveillance system footage. Mullins said he lost the key to the surveillance system lock box and was unable to provide access to MK Health's dedicated video surveillance system and produce historical surveillance footage for inspection. The video surveillance system was displaying live footage of the premises on an overhead monitor and appeared operational. Mullins said he had a secondary video surveillance system through a "Ring" camera system.

I reviewed the Ring video surveillance footage and observed an individual that appeared to be one of the drivers from the Toocan system, earlier identified as Ricky, at the licensed premises by himself, fulfilling orders, and staying overnight at the licensed premises. I asked for the identification of the individual, which Mullins stated was Ricky. Additionally, Mullins, Auel, and the child were observed staying overnight at MK Health's licensed premises (**Attachment I**). I asked Mullins if Ricky lived at the licensed premises. Mullins said Ricky did not live there. However, in my review of the video surveillance, I discovered Ricky was staying at the licensed premises every night since approximately the end of October 2024, the length of time the Ring video surveillance camera retained historical recordings.

At approximately 1645 hours, SSI I White, SI McLean and I left the licensed premises.

On January 17, 2025, I emailed Mullins twice, regarding a request for records and video surveillance footage to [brandoncole.mullins@gmail.com](mailto:brandoncole.mullins@gmail.com) and [brandon@medicalkush.org](mailto:brandon@medicalkush.org), the contact email listed in Department licensing records. The deadline to respond provided within both emails was January 21, 2025. One of the emails included a Notice to Comply (**Attachment J**).



## INVESTIGATION REPORT

On January 21, 2025, I received a response to the DCC records request from Mullins. I reviewed the response and in summary, I discovered that the documents submitted by Mullins either had insufficient information or did not include all of the requested records or video surveillance footage (**Attachment K**).

Documents I requested that were provided with incomplete or insufficient information include:

- Record of sales on point-of-sale system (Magento) from January 1, 2020, to January 15, 2025, (**Attachment L**):
  - Records do not show UID numbers for the product sold or a description of the product
  - Records show sales created after regulatory hours but do not show the actual time of deliveries
- GPS history of delivery vehicle(s) from January 8, 2025, to January 15, 2025, (**Attachment M**):
  - GPS data does not provide adequate information to determine the location of completed cannabis sales

Documents and records I requested but did not receive include:

- METRC Retailer Delivery Ledger from January 1, 2020, to January 15, 2020
- METRC Sales Delivery Manifest from January 1, 2020, to January 15, 2020
- Employee records for delivery driver(s) as listed on Tookan, "Ricky" and "Auel" All video surveillance footage for the past 90-days as of inspection date on January 15, 2025

As of the date of this report, Mullins has not produced the remaining records or video surveillance footage requested on January 17, 2025.

Additionally, within Mullins' emailed response on January 21, 2025, he stated the interface from his point-of-sale system to METRC has been corrected as of January 20, 2025. On January 30, 2025, I researched MK Health's CCTT account and discovered Sales Receipts show records as of January 21, 2025 (**Attachment N**). However, MK Health failed to document the additional required vehicle, driver, and delivery details in its CCTT Account as required to be recorded in a CCTT Sales Delivery Manifests.

I converted the point-of-sale data Mullins provided (**see Attachment L**) into a Microsoft Excel file with the help of SSI I White. I combined and compared the reported number of cannabis items sold to the number of cannabis items in MK Health's CCTT packages report (**see Attachment B**). I discovered there are 18,055 units unaccounted for, less the estimated two hundred units observed at the licensed premises during the inspection on January 15, 2025, (**Attachment O**). The details of the cannabis packages and items are broken down as follows:

Packaged Units of Each	99,641
Packaged Units of Flower	6,009
Total Units	105,650

Total Units Recorded As Sold	87,595
------------------------------	--------

Total Units Recorded in CCTT	105,650
Total Units Recorded As Sold	87,595
Units Unaccounted For	18,055

### WITNESS LIST

#### Witness #1

- Name: Travis White
- Title/Position: Supervising Special Investigator I
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670



## INVESTIGATION REPORT

- Phone: (916) 693-3044
- E-mail: travis.white@cannabis.ca.gov

### Witness #2

- Name: Traci Lucchesi
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (916) 539-8307
- E-mail: traci.lucchesi@cannabis.ca.gov

### Witness #3

- Name: Matthew McLean
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (916) 223-7121
- E-mail: matthew.mclean@cannabis.ca.gov
- Miscellaneous information: Assisted with investigation

### Witness #4

- Name: Brandon Mullins
- Title/Position: Owner of MK Health Alliance LLC
- Address: 4401 San Leandro Street, Unit #27, Oakland, CA 94601
- Phone: (925) 322-0009
- E-mail: brandoncolemullins@gmail.com
- Miscellaneous information:

PREPARER	
Name	Title
Traci Lucchesi	Special Investigator
Signature	Date
April 8, 2025	
REVIEWER	
Name	Title
Travis White	Supervising Special Investigator I
Signature	Date

### LIST OF ATTACHMENTS

- Contact Summary and Active License Verification
- 1.15.25 METRC Package Report
- Recorded Customer Sales in METRC
- Premises diagram
- Pictures of personal items used for staying overnight at the premises
- MedicalKush customer orders
- MedicalKush website, no age verification
- Vehicle tracking system
- Ring camera system pictures
- 1.17.25 Request for Records Email & NTC
- Response to Records Request



## INVESTIGATION REPORT

- L. Point of Sale Data from Licensee
- M. Vehicle GPS History from Licensee
- N. Sales Receipts 1.21.25 to 1.30.25
- O. Units Unaccounted For

## PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: MK Health Alliance, LLC  
DCC Case No. DCC25-0000138  
License Number: C9-0000115-LIC

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Department of Cannabis Control, 2920 Kilgore Road, Rancho Cordova, CA 95670. On July 30, 2025, I served the within documents:

### NOTICE OF DEFAULT DECISION AND ORDER

- VIA ELECTRONIC TRANSMISSION. Pursuant to CCP § 1010.6, I caused the document(s) to be sent to the person(s) at the Email address(es) listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- VIA CERTIFIED MAIL by placing the envelope for collection and mailing following our ordinary business practices for collecting and transmitting mail through the United States Postal Service to the individual(s) or entity(ies) listed below.
  - Service via certified mail to be completed upon the following business day.

MK Health Alliance, LLC  
Brandon Mullins, Owner  
4401 San Leandro St., Unit #27  
Oakland, CA 94601  
Certified Mail No. 7022 1670 0001 3411 3523

Brandon Mullins  
115-C Arnold Dr.  
Martinez, CA 94553  
Certified Mail No. 7022 1670 0001 3411 3530  
brandoncolemullins@gmail.com

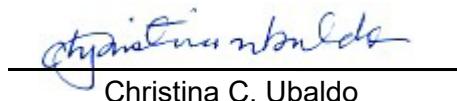
Evelyn Schaeffer (email only)  
Deputy Director  
Compliance Division  
Department of Cannabis Control  
Evelyn.Schaeffer@cannabis.ca.gov

Matthew S. Beasley (email only)  
Deputy Attorney General  
Cannabis Control Section  
Office of Attorney General  
Matthew.Beasley@doj.ca.gov

I am familiar with the Department's business practices for collecting and transmitting mail through the United States Postal Service. In accordance with those practices, correspondence placed in the Department's internal mail collection system is, in the ordinary course of business, deposited in the United States Postal Service, with postage paid, on the same day.

I declare under penalty of perjury under the laws of the State of California, and the United States of America, that the above is true and correct.

Executed on July 30, 2025, at Rancho Cordova, California.



---

Christina C. Ubaldo