



**Department of  
Cannabis Control**  
CALIFORNIA

**Gavin Newsom**

Governor

**Nicole Elliott**

Director

September 11, 2025

**VIA EMAIL AND CERTIFIED MAIL**

Pacific Shield Vertical, Inc.  
Kenneth Corben, Owner  
1443 Anaheim St.  
Long Beach, CA 90813  
Ken@pacificshielddistribution.com

Kenneth Corben  
1445 W Anaheim St.  
Long Beach, CA 90813  
Ken.d3d@gmail.com

Re: Pacific Shield Vertical, Inc.- Case No. DCC25-0000322-INV  
Default Decision and Order

Dear Mr. Corben:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent Pacific Shield Vertical, Inc., 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 Pacific Shield Vertical, Inc., will become effective on October 13, 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. DCC25-0000322-INV

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN, OWNER  
1443 W. Anaheim Street  
Long Beach, CA 90813**

## **DEFAULT DECISION AND ORDER**

**Cannabis - Distributor License  
No. C11-0001142-LIC**

[Gov. Code, §11520]

### Respondent.

## **FINDINGS OF FACT**

1. On or about July 11, 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. DCC25-0000322-INV against Pacific Shield Vertical Inc.; Kenneth Corben, Owner (Respondent) before the Department of Cannabis Control. (Accusation attached as Exhibit 1.)

2. On or about January 18, 2020, the Department of Cannabis Control (Department) issued Cannabis - Distributor License No. C11-0001142-LIC to Respondent. The Cannabis - Distributor License was in full force and effect at all times relevant to the charges brought in

1 Accusation No. DCC25-0000322-INV. The Cannabis - Distributor License expires on January  
2 17, 2026, unless renewed.

3 3. On or about July 11, 2025, Respondent was served by Certified Mail and First Class  
4 Mail copies of the Accusation No. DCC25-0000322-INV, Statement to Respondent, Notice of  
5 Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5,  
6 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of  
7 Regulations, title 4, section 15002, is required to be reported and maintained with the  
8 Department. Respondent's address of record was and is: 1443 W. Anaheim Street, Long Beach,  
9 CA 90813.

10 4. Service of the Accusation was effective as a matter of law under the provisions of  
11 Government Code section 11505, subdivision (c) and/or Business and Professions Code section  
12 124.

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

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

17 6. The Department takes official notice of its records and the fact that Respondent failed  
18 to file a Notice of Defense within 15 days after service upon them of the Accusation, and  
19 therefore waived its right to a hearing on the merits of Accusation No. DCC25-0000322-INV.

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

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

24 8. Pursuant to its authority under Government Code section 11520, the Department finds  
25 Respondent is in default. The Department will take action without further hearing and, based on  
26 the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this  
27 matter, finds that the charges and allegations in Accusation No. DCC25-0000322-INV, are  
28 separately and severally, found to be true and correct by clear and convincing evidence.

9. The Department finds that the actual costs for Enforcement and Prosecution are \$20,495.91 as of September 4, 2025.

## **DETERMINATION OF ISSUES**

1. Based on the foregoing findings of fact, Respondent Pacific Shield Vertical Inc., with Kenneth Corben as Owner, has subjected its Cannabis - Distributor License No. C11-0001142-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 - Distributor 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 15000.3, subdivision (d), and 17800, subdivision (a) [Failure to Provide Department Access to Licensed Premises];
- b. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and 26160, subdivisions (a) through (e), and Title 4 of the California Code of Regulations, section 15037, subdivision (a), 15044, subdivision (i), 15047.2, and 15312, subdivision (a) [Failure to Maintain Accurate Records and Provide Records for Inspection];
- c. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and Title 4 of the California Code of Regulations, section 15311, subdivision (a), and 15313, subdivision (b) [Failure to Employ Drivers and Utilizing Unowned or Leased Delivery Vehicles];
- d. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and 26110, subdivision (g), and Title 4 of the California Code of Regulations, section 15306, subdivision (c) [Transported Cannabis Goods That Have Not Been Submitted to, nor Passed Regulatory Compliance Testing, to Other Licensed Distributors];
- e. Violation of Business and Professions Code section 26030, subdivisions (a) and (c), and 26110, subdivision (g), Title 4 of the California Code of Regulations, 15307.2,

1 subdivision (a) [Respondent Received Cannabis Goods That Have Not Been  
2 Submitted for, Nor Have Undergone Regulatory Compliance Testing].

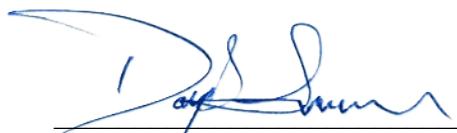
3 **ORDER**

4 IT IS SO ORDERED that Cannabis - Distributor License No. C11-0001142-LIC, issued  
5 to Respondent Pacific Shield Vertical Inc., with Kenneth Corben as Owner, is revoked.

6 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a  
7 written motion requesting that the Decision be vacated and stating the grounds relied on within  
8 seven (7) days after service of the Decision on Respondent. The agency in its discretion may  
9 vacated the Decision and grant a hearing on a showing of good cause, as defined in the statute.

10 This Decision shall become effective on October 13, 2025.

11 It is SO ORDERED, September 11, 2025.

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13

14 Douglas Smurr  
15 Assistant General Counsel  
16 FOR THE DEPARTMENT OF CANNABIS CONTROL

17 Default Decision and ORDER - LIC.docx  
18 DOJ Matter ID: LA2025802197

19 Attachment:  
20 Exhibit A: Accusation

# Exhibit A

## Accusation

1 ROB BONTA  
2 Attorney General of California  
3 HARINDER K. KAPUR  
4 Senior Assistant Attorney General  
5 State Bar No. 198769  
6 600 West Broadway, Suite 1800  
7 San Diego, CA 92101  
8 Telephone: (619) 738-9407  
9 Facsimile: (916) 732-7920  
10 E-mail: Harinder.Kapur@doj.ca.gov  
11 *Attorneys for Complainant*

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

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

Case No. DCC25-0000322-INV

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN, OWNER  
1443 W. Anaheim Street  
Long Beach, CA 90813**

## ACCUSATION

**Cannabis - Distributor License  
No. C11-0001142-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 January 18, 2020, the Department issued Cannabis - Distributor License No. C11-0001142-LIC to Pacific Shield Vertical Inc. (Respondent), with Kenneth Corben as Owner (Owner Corben). The Cannabis - Distributor License was in full force and effect at all times relevant to the charges brought herein, and will expire on January 17, 2026, unless renewed.

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## **PROCEDURAL HISTORY**

3. The Department issued an Emergency Decision and Order (EDO), pursuant to California Code of Regulations, title 4, section 17815 that was served on Respondent on July 3, 2025, and was effective the same day at 10:00 a.m. The EDO suspended Respondent's license and ordered Respondent to cease all commercial cannabis activity. The time to initiate adjudicative proceedings is within 10 days after issuance of the EDO, or by or on July 13, 2025.

## **JURISDICTION**

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

5. 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.

6. 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.

7. 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.

8. 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.

1           9. 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           (b) The department may suspend or revoke a license when a local agency has  
11           notified the department that a licensee within its jurisdiction is in violation of state  
12           rules and regulations relating to commercial cannabis activities, and the department,  
13           through an investigation, has determined that the violation is grounds for suspension  
14           or revocation of the license.

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

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

27           10. Section 26034 of the Code states:

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

## 29           STATUTORY PROVISIONS

30           11. Section 26030 of the Code states:

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

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

35           ...

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

• • •

12. Section 26110 of the Code states, in pertinent part:

(g) After testing, all cannabis and cannabis products fit for sale may be transported only from the distributor's premises to the premises of another licensed distributor for further distribution, or to a licensed retailer, microbusiness, or nonprofit for retail sale.

13. Section 26160 of the Code states:

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

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

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

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

(e) A licensee, or its agent or employee, that refuses, impedes, obstructs, or interferes with an inspection of the premises or records of the licensee pursuant to this section, has engaged in a violation of this division.

(f) If a licensee, or an agent or employee of a licensee, fails to maintain or provide the records required pursuant to this section, the licensee shall be subject to a citation and fine of up to thirty thousand dollars (\$30,000) per individual violation.

## REGULATORY PROVISIONS

14. Title 4 of the California Code of Regulations, section 15000.3, states in part:

(d) Licensees shall ensure that the Department has immediate access to their licensed premises. If the Department is denied access to a licensee's premises for any reason, the licensee shall be held responsible and subject to discipline. If the Department is denied access to one licensee's premises because of another licensee's refusal to grant access when the only access to one licensed premises is through another licensed premises, all licensees shall be held responsible and subject to discipline.

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

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

5 (1) Financial records including, but not limited to, bank statements, sales  
6 invoices, receipts, tax records, and all records required by the California Department  
7 of Tax and Fee Administration (formerly Board of Equalization) under title 18,  
8 California Code of Regulations, sections 1698 and 4901.

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

12 (3) Training records including, but not limited to, the content of the training  
13 provided and the names of the employees who received the training.

14 (4) Contracts regarding commercial cannabis activity.

15 (5) Permits, licenses, and other local authorizations to conduct the licensee's  
16 commercial cannabis activity.

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

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

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

22 (c) Records must be legible and accurate. No person may intentionally  
23 misrepresent or falsify records.

24 (d) Records must be stored in a secured area where the records are protected  
25 from debris, moisture, contamination, hazardous waste, and theft.

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

27 (i) Surveillance recordings are subject to inspection by the Department and shall be  
28 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.

17. Title 4 of the California Code of Regulations, section 15047.2, states:

18 (a) A licensee shall create and maintain an account within the track and trace  
19 system prior to engaging in any commercial cannabis activity.

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

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

(d) A person shall not intentionally misrepresent or falsify information entered into the track and trace system.

18. Title 4 of the California Code of Regulations, section 15306, states in part:

(c) When a batch passes regulatory compliance testing, the cannabis or cannabis products may be transported to one or more licensed retailers, licensed distributors, or licensed microbusinesses authorized to conduct distribution or retail. A copy of the certificate of analysis for regulatory compliance testing shall be provided to all licensed distributors receiving the batch for purposes of quality assurance review under section 15307. A copy of the certificate of analysis shall also be provided to the licensee who produced the batch. The copies of the certificate of analysis required by this subsection may be provided electronically.

19. Title 4 of the California Code of Regulations, section 15307.2, states in part:

(a) Cannabis goods that have undergone and passed regulatory compliance testing and have an accompanying certificate of analysis may be transferred to one or more licensed distributors.

20. Title 4 of the California Code of Regulations, section 15311, states in part:

The following requirements apply when transporting cannabis and cannabis products between licensees or licensed premises:

(a) Transportation shall only be conducted by persons holding a distributor license under the Act, or employees of those persons. All vehicles and trailers used for transportation shall be owned or leased, in accordance with the Vehicle Code, by the licensee. The licensee is not required to be the sole owner or lessor of the vehicle or trailer and all owners and lessors may use the vehicle for non-commercial cannabis activity.

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21. Title 4 of the California Code of Regulations, section 15312, states:

(a) Upon request, the licensed distributor shall provide the Department with a copy of the certificate of ownership or registration card issued by the California Department of Motor Vehicles, the year, make, model, license plate number, and Vehicle Identification Number in writing, and proof of insurance for any vehicle or trailer used to transport cannabis or cannabis products.

22. Title 4 of the California Code of Regulations, section 15313, states in part:

• • •

(b) Only a licensee, an employee of the licensed distributor, or security personnel who meets the requirements of section 15045 shall be in a vehicle while transporting cannabis or cannabis products.

1           23. Title 4 of the California Code of Regulations, section 17800, states:

2           (a) The Department and its authorized representatives, for purposes of  
3           inspection, investigation, review, or audit, shall have full and immediate access to:

4           (1) Enter any premises licensed by the Department.

5           (2) Inspect and test any vehicle or equipment possessed by, in control of, or  
6           used by a licensee or their agents and employees for the purpose of conducting  
7           commercial cannabis activity.

8           (3) Test any cannabis goods or cannabis-related materials or products possessed  
9           by, in control of, or used by a licensee or their agents and employees for the purpose  
10           of conducting commercial cannabis activity.

11           (4) Copy any materials, books, or records of any licensee or their agents and  
12           employees.

13           (b) Failure to cooperate with and participate in any Department investigation  
14           pending against the licensee may result in a licensing violation subject to discipline.  
15           This subsection shall not be construed to deprive a licensee of any privilege  
16           guaranteed by the Fifth Amendment to the Constitution of the United States, or any  
17           other constitutional or statutory privileges. This subsection shall not be construed to  
18           require a licensee to cooperate with a request that would require the licensee to waive  
19           any constitutional or statutory privilege or to comply with a request for information or  
20           other matters within an unreasonable period of time in light of the time constraints of  
21           the licensee's business. Any constitutional or statutory privilege exercised by the  
22           licensee shall not be used against the licensee in a regulatory or disciplinary  
23           proceeding against the licensee.

24           (c) Prior notice of an inspection, investigation, review, or audit is not required.

25           (d) Any inspection, investigation, review, or audit of a licensed premises shall  
26           be conducted anytime the licensee is exercising privileges under the license, or as  
27           otherwise agreed to by the Department and the licensee or its agents, employees, or  
28           representatives.

29           (e) If the licensed premises is not accessible because access is only available by  
30           going through another licensed premises and the licensee occupying the other  
31           licensed premises denies the Department access, the licensees shall both be held  
32           responsible and subject to discipline.

## **COST RECOVERY**

33           24. Section 26031.1 of the Code states:

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

38           (b) A certified copy of the actual costs, or a good faith estimate of costs where  
39           actual costs are not available, signed by the department or its designated  
40           representative shall be *prima facie* evidence of reasonable costs of investigation and  
41           prosecution of the case. The costs shall include the amount of investigative and

1 enforcement costs up to the date of the hearing, including, but not limited to, charges  
2 imposed by the Attorney General.

3 (c) The administrative law judge shall make a proposed finding of the amount  
4 of reasonable costs of investigation and prosecution of the case when requested  
5 pursuant to subdivision (a). The finding of the administrative law judge with regard to  
6 costs shall not be reviewable by the department to increase the cost award. The  
7 department may reduce or eliminate the cost award, or remand to the administrative  
8 law judge if the proposed decision fails to make a finding on costs requested pursuant  
9 to subdivision (a).

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

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

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

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

24 (g) All costs recovered under this section shall be considered a reimbursement  
25 for costs incurred and shall be deposited into the Cannabis Control Fund to be  
available upon appropriation by the Legislature.

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

28 **FACTUAL ALLEGATIONS**

29 25. On or about February 12, 2025, Department staff went to Respondent's licensed  
30 premises during normal business hours to conduct an unannounced regulatory compliance  
31 inspection. At that time, Respondent's California Cannabis Track and Trace account reflected  
32 that there should be 12,602 cannabis packages, totaling 854,517 packaged cannabis items and  
33 96,334 pounds of bulk cannabis, physically present at the licensed premises. The licensed  
34 premises was locked, and no one responded when Department staff knocked on both the front and  
35 back door entrances. Department staff attempted to contact Owner Corben via telephone and text  
36

1 message, but he did not respond. After waiting approximately 45 minutes, Department staff left  
2 Respondent's licensed premises.

3 26. Later that day, after having received no response from Owner Corben, a Notice to  
4 Comply (NTC) was sent to Owner Corben requesting the following: access to the licensed  
5 premises, video surveillance footage of all exterior and interior cameras from January 1, 2025  
6 through February 12, 2025, and business records showing all outbound transfer invoices licensee  
7 "LBAS", all inbound transfer invoices to Respondent from January 1, 2025, to February 12, 2025,  
8 employee records for all individuals employed by Respondent from January 1, 2024, to February  
9 12, 2025, and all transport vehicle registration(s) and proof of insurance for all vehicles used by  
10 Respondent.

11 27. On or about February 13, 2025, Respondent submitted four separate emails  
12 responding to the NTC. Respondent provided 33 transfer invoices from Respondent to licensee  
13 "LBAS" and California Department of Motor Vehicles (DMV) registration for a 2011 Ford E350,  
14 which Owner Corben stated was not operating and a DMV registration for a 2003 Ford F-150.  
15 The vehicles were not registered to Respondent, or any other person associated with Respondent.  
16 Respondent stated that it had no employees from January 1, 2025, to January 10, 2025, and  
17 needed additional time to ascertain employee information for the period covering January 11,  
18 2025, to February 12, 2025. Respondent did not provide inbound transfer invoices. In addition,  
19 Respondent did not provide a date and time for Department staff to conduct a regulatory  
20 compliance inspection but stated "winter business hours are not full time."

21 28. A review of the transfer manifests submitted by Respondent showed that Respondent  
22 failed to submit invoices for transfer manifests 0007610205 and 0008154397; and the quantity on  
23 invoice 01032024-001 (Quantity: 6) and the quantity recorded on the correlating manifest  
24 0006328871 (Quantity: 2541 g) did not match.

25 29. On or about February 13, 2025, Department staff reviewed CCTT account  
26 information for Respondent and saw that from January 1, 2025, to February 12, 2025, Respondent  
27 accepted 212 inbound shipping manifests listing itself as the transporter. The transfer manifests  
28 recorded that the transfers were performed by 112 distinct drivers using 124 distinct vehicles.

1           30. On or about February 14, 2025, Department staff reviewed Respondent's CCTT  
2 account and noted that Respondent began creating outbound transfer manifests on February 12,  
3 2025, exclusively to "HBC" a licensed distributor. The review showed that on or about February  
4 12, 2025, Respondent created 36 manifests to "HBC" recording the transfer of approximately  
5 96,000 lbs. of cannabis flower, leaf, kief, or shake; and 852,000 units of packaged cannabis  
6 concentrates, extracts, vape cartridges, pre-rolls, flower, edibles, tinctures, and topicals. Of the  
7 units transferred, 288,478 units were transferred without completion of regulatory compliance  
8 testing. The 36 transfer manifests generated on February 12, 2025, indicated a single driver,  
9 "HF" and a single vehicle, conducting the transfers for Respondent. All the transfer manifests  
10 were created by Respondent and accepted by "HBC" between 6:13 p.m. and 6:59 p.m. on  
11 February 12, 2025.

12           31. Respondent's CCTT account review also showed that between February 13, 2025,  
13 and February 14, 2025, Respondent generated three transfer manifests transferring an additional  
14 612 packages. A review of 39 total transfers in CCTT between Respondent and "HBC" showed  
15 that the outbound transfer manifests were created by CCTT User ID Name(s), "EA" or "PC" both  
16 listed as Respondent's employees in the CCTT system, but not reported as employees by Owner  
17 Corben.

18           32. On or about March 5, 2025, Department staff conducted a regulatory compliance  
19 inspection of "HBC's" licensed premises and found no cannabis or cannabis products present.  
20 "HBC" staff denied receiving any cannabis or cannabis products from Respondent or knowledge  
21 of where the cannabis or cannabis products that had been accepted in the "HBC" CCTT account  
22 were located.

23           33. Also, on or about March 5, 2025, Department staff went to Respondent's licensed  
24 premises during normal business hours to conduct a regulatory compliance inspection, however  
25 the building was locked. Department staff called Owner Corben and left a voicemail message  
26 and sent a text message to Owner Corben requesting access to the licensed premises. After  
27 waiting and receiving no response from Owner Corben, Department staff left the licensed  
28 premises.

34. On or about March 27, 2025, Department staff reviewed Respondent's CCTT account. From the available information, between February 12, 2025, through March 27, 2025, Respondent had created a total of 791 manifests, listing 332 distinct transport drivers and 402 distinct transport vehicles.

35. On or about May 22, 2025, Department staff reviewed Respondent's active cannabis inventory in its CCTT account and generated a package report from its CCTT account which showed 28,727 active cannabis packages in Respondent's inventory accounting for 1,268,127 cannabis products and 231,858 pounds of bulk cannabis. Of the active packages, 634,877 cannabis products and 225,864 pounds of cannabis had not undergone regulatory compliance testing. In addition to the untested cannabis and cannabis products, 8,938 items had failed regulatory compliance testing and there had been no remediation plan submitted to the Department.

36. To date, Respondent has not provided the Department with access to its licensed premises, and has not provided requested video surveillance footage, and other outstanding records

## **FIRST CAUSE FOR DISCIPLINE**

### (Premises Requirement)

37. Respondent is subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d), and 17800, subdivision (a), for failing to provide the Department with access to the licensed premises as more particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **SECOND CAUSE FOR DISCIPLINE**

(Records: General Requirements, Inspection, Maintenance)

38. Respondent is further subject to disciplinary action under Code sections 26030, subdivisions (a) and (c), and 26160, subdivisions (a) through (e), and California Code of Regulations, title 4, sections 15037, subdivision (a), 15044, subdivision (i), 15047.2, and 15312, subdivision (a) for failing to maintain accurate records and provide records for inspection to the

1      Department as more particularly alleged in paragraphs 25 through 36, above, which are hereby  
2      incorporated by reference and realleged as if fully set forth herein.

3      **THIRD CAUSE FOR DISCIPLINE**

4      (Requirements for Transportation of Cannabis)

5      39. Respondent is further subject to disciplinary action under Code section 26030,  
6      subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15311, subdivision  
7      (a), and 15313, subdivision (b), in that Respondent reported no employees and one operational  
8      vehicle for its business, however, between January and March 2025, utilized 332 separate  
9      transport drivers and 402 different vehicles for cannabis transportation as more particularly  
10     alleged in paragraphs 25 through 36, above, which are hereby incorporated by reference and  
11     realleged as if fully set forth herein.

12     **FOURTH CAUSE FOR DISCIPLINE**

13     (Transportation and Regulatory Compliance Testing)

14     40. Respondent is further subject to disciplinary action under Code sections 26030,  
15     subdivisions (a) and (c), and 26110, subdivision (g), and California Code of Regulations, title 4,  
16     section 15306, subdivision (c), in that Respondent transported cannabis goods that had not been  
17     submitted for or passed regulatory compliance testing to other licensed distributors as more  
18     particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by  
19     reference and realleged as if fully set forth herein.

20     **FIFTH CAUSE FOR DISCIPLINE**

21     (Licensed Distributor to Licensed Distributor Transfers)

22     41. Respondent is further subject to disciplinary action under Code section 26030,  
23     subdivisions (a) and (c), and 26110, subdivision (g), and California Code of Regulations, title 4,  
24     section 15307.2, subdivision (a), in that Respondent received from another licensed distributor  
25     cannabis goods that had not been submitted for or passed regulatory compliance testing as more  
26     particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by  
27     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 issue a decision:

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Distributor License Number C11-0001142-LIC, issued to Respondent Pacific Shield Vertical Inc. with Kenneth Corben, Owner;

2. Ordering Respondent Pacific Shield Vertical Inc. with Kenneth Corben, Owner to pay the Department of Cannabis Control 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 Pacific Shield Vertical Inc. with Kenneth Corben, at Respondent's expense if revocation of Cannabis - Distributor License Number C11-00011421-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: July 11, 2025

Evelyn Schaeffer

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

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

In the Matter of the Accusation Against:

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN, OWNER  
1443 W. Anaheim Street  
Long Beach, CA 90813**

**Cannabis - Distributor License  
No. C11-0001142-LIC**

Respondent.

Case No. DCC25-0000322-INV

**DEFAULT DECISION INVESTIGATORY  
EVIDENCE PACKET**

[Gov. Code §11520]

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. DCC25-0000322-INV, statement to respondent, notice of defense (two blank copies), request for discovery, discovery statutes (government code sections 11507.5, 11507.6 and 11507.7), proofs of service;

**Exhibit 2:** License History Certification for Pacific Shield Vertical Inc.; Kenneth Corben, Owner Cannabis - Distributor License No. C11-0001142-LIC;

**Exhibit 3:** Certification of Costs by Department for Investigation and Enforcement in Case No. DCC25-0000322-INV dated August 13, 2025;

**Exhibit 4:** Certification of Costs by California Department of Justice for Prosecution in Case No. DCC25-0000322-INV dated September 4, 2025;

**Exhibit 5:** Return Receipts from the United States Postal Service; and

**Exhibit 6:** Investigative Report (without attachments) [Case No. DCC25-0000322-INV].

Dated: September 4, 2025

Respectfully submitted,

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

*Michael Duong*

MICHAEL DUONG  
Deputy Attorney General  
*Attorneys for Complainant*

# Exhibit 1

Accusation No. DCC25-0000322-INV  
Statement to Respondent  
Notice of Defense  
Request for Discovery  
Discovery Statutes, Proofs of Service

1 ROB BONTA  
2 Attorney General of California  
3 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 State Bar No. 198769  
6 600 West Broadway, Suite 1800  
4 San Diego, CA 92101  
Telephone: (619) 738-9407  
5 Facsimile: (916) 732-7920  
E-mail: Harinder.Kapur@doj.ca.gov  
6 *Attorneys for Complainant*

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

10

11 In the Matter of the Accusation Against:

Case No. DCC25-0000322-INV

12 **PACIFIC SHIELD VERTICAL INC.;**  
**KENNETH CORBEN, OWNER**

**STATEMENT TO RESPONDENT**

13 [Gov. Code §§ 11504, 11505(b)]

14 Respondent.

15 TO RESPONDENT:

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

18 Unless a written request for a hearing signed by you or on your behalf is delivered or  
19 mailed to the Department, represented by Senior Assistant Attorney General Harinder K. Kapur,  
20 within fifteen (15) days after a copy of the Accusation was personally served on you or mailed to  
21 you, you will be deemed to have waived your right to a hearing in this matter and the Department  
22 may proceed upon the Accusation without a hearing and may take action thereon as provided by  
23 law.

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

27 ///

28 ///

**Harinder K. Kapur  
Senior Assistant Attorney General  
600 West Broadway, Suite 1800  
San Diego, CA 92101**

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

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

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

The hearing may be postponed for good cause. If you have good cause, you are obliged to notify the Office of Administrative Hearings, 320 West Fourth Street, Suite 630, Los Angeles, CA 90013, within ten (10) working days after you discover the good cause. Failure to notify the Office of Administrative Hearings within ten (10) days will deprive you of a postponement.

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

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

## **NOTICE REGARDING STIPULATED SETTLEMENTS**

It may be possible to avoid the time, expense and uncertainties involved in an 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 charged and the discipline to be imposed. Such a stipulation would have to be approved by the Department of Cannabis Control but once approved, it would be incorporated into a final order.

Any stipulation must be consistent with the Department's established disciplinary guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the

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1 Department's Disciplinary Guidelines will be provided to you on your written request to the state  
2 agency bringing this action.

3 If you are interested in pursuing this alternative to a formal administrative hearing, or if you  
4 have any questions, you or your attorney should contact Senior Assistant Attorney General  
5 Harinder K. Kapur at the earliest opportunity.

6  
7 Dated: July 11, 2025

ROB BONTA  
Attorney General of California

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10   
11 HARI  
12 NDER K. KAPUR  
13 Senior Assistant Attorney General  
14 Attorneys for Complainant

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ROB BONTA  
Attorney General of California  
HARINDER K. KAPUR  
Senior Assistant Attorney General  
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Facsimile: (916) 732-7920  
E-mail: Harinder.Kapur@doj.ca.gov  
*Attorneys for Complainant*

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

## In the Matter of the Accusation Against:

Case No. DCC25-0000322-INV

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN, OWNER  
1443 W. Anaheim Street  
Long Beach, CA 90813**

## ACCUSATION

**Cannabis - Distributor License  
No. C11-0001142-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 January 18, 2020, the Department issued Cannabis - Distributor License No. C11-0001142-LIC to Pacific Shield Vertical Inc. (Respondent), with Kenneth Corben as Owner (Owner Corben). The Cannabis - Distributor License was in full force and effect at all times relevant to the charges brought herein, and will expire on January 17, 2026, unless renewed.

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## **PROCEDURAL HISTORY**

3. The Department issued an Emergency Decision and Order (EDO), pursuant to California Code of Regulations, title 4, section 17815 that was served on Respondent on July 3, 2025, and was effective the same day at 10:00 a.m. The EDO suspended Respondent's license and ordered Respondent to cease all commercial cannabis activity. The time to initiate adjudicative proceedings is within 10 days after issuance of the EDO, or by or on July 13, 2025.

## **JURISDICTION**

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

5. 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.

6. 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.

7. 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.

8. 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.

1           9. 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           (b) The department may suspend or revoke a license when a local agency has  
11           notified the department that a licensee within its jurisdiction is in violation of state  
12           rules and regulations relating to commercial cannabis activities, and the department,  
13           through an investigation, has determined that the violation is grounds for suspension  
14           or revocation of the license.

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

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

27           10. Section 26034 of the Code states:

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

## 29           STATUTORY PROVISIONS

30           11. Section 26030 of the Code states:

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

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

35           ...

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

• • •

12. Section 26110 of the Code states, in pertinent part:

(g) After testing, all cannabis and cannabis products fit for sale may be transported only from the distributor's premises to the premises of another licensed distributor for further distribution, or to a licensed retailer, microbusiness, or nonprofit for retail sale.

13. Section 26160 of the Code states:

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

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

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

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

(e) A licensee, or its agent or employee, that refuses, impedes, obstructs, or interferes with an inspection of the premises or records of the licensee pursuant to this section, has engaged in a violation of this division.

(f) If a licensee, or an agent or employee of a licensee, fails to maintain or provide the records required pursuant to this section, the licensee shall be subject to a citation and fine of up to thirty thousand dollars (\$30,000) per individual violation.

## **REGULATORY PROVISIONS**

14. Title 4 of the California Code of Regulations, section 15000.3, states in part:

(d) Licensees shall ensure that the Department has immediate access to their licensed premises. If the Department is denied access to a licensee's premises for any reason, the licensee shall be held responsible and subject to discipline. If the Department is denied access to one licensee's premises because of another licensee's refusal to grant access when the only access to one licensed premises is through another licensed premises, all licensees shall be held responsible and subject to discipline.

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

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

5 (1) Financial records including, but not limited to, bank statements, sales  
6 invoices, receipts, tax records, and all records required by the California Department  
7 of Tax and Fee Administration (formerly Board of Equalization) under title 18,  
8 California Code of Regulations, sections 1698 and 4901.

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

12 (3) Training records including, but not limited to, the content of the training  
13 provided and the names of the employees who received the training.

14 (4) Contracts regarding commercial cannabis activity.

15 (5) Permits, licenses, and other local authorizations to conduct the licensee's  
16 commercial cannabis activity.

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

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

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

22 (c) Records must be legible and accurate. No person may intentionally  
23 misrepresent or falsify records.

24 (d) Records must be stored in a secured area where the records are protected  
25 from debris, moisture, contamination, hazardous waste, and theft.

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

27 (i) Surveillance recordings are subject to inspection by the Department and shall be  
28 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.

17. Title 4 of the California Code of Regulations, section 15047.2, states:

18 (a) A licensee shall create and maintain an account within the track and trace  
19 system prior to engaging in any commercial cannabis activity.

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

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

(d) A person shall not intentionally misrepresent or falsify information entered into the track and trace system.

18. Title 4 of the California Code of Regulations, section 15306, states in part:

(c) When a batch passes regulatory compliance testing, the cannabis or cannabis products may be transported to one or more licensed retailers, licensed distributors, or licensed microbusinesses authorized to conduct distribution or retail. A copy of the certificate of analysis for regulatory compliance testing shall be provided to all licensed distributors receiving the batch for purposes of quality assurance review under section 15307. A copy of the certificate of analysis shall also be provided to the licensee who produced the batch. The copies of the certificate of analysis required by this subsection may be provided electronically.

19. Title 4 of the California Code of Regulations, section 15307.2, states in part:

(a) Cannabis goods that have undergone and passed regulatory compliance testing and have an accompanying certificate of analysis may be transferred to one or more licensed distributors.

20. Title 4 of the California Code of Regulations, section 15311, states in part:

The following requirements apply when transporting cannabis and cannabis products between licensees or licensed premises:

(a) Transportation shall only be conducted by persons holding a distributor license under the Act, or employees of those persons. All vehicles and trailers used for transportation shall be owned or leased, in accordance with the Vehicle Code, by the licensee. The licensee is not required to be the sole owner or lessor of the vehicle or trailer and all owners and lessors may use the vehicle for non-commercial cannabis activity.

3

21. Title 4 of the California Code of Regulations, section 15312, states:

(a) Upon request, the licensed distributor shall provide the Department with a copy of the certificate of ownership or registration card issued by the California Department of Motor Vehicles, the year, make, model, license plate number, and Vehicle Identification Number in writing, and proof of insurance for any vehicle or trailer used to transport cannabis or cannabis products.

22. Title 4 of the California Code of Regulations, section 15313, states in part:

• • •

(b) Only a licensee, an employee of the licensed distributor, or security personnel who meets the requirements of section 15045 shall be in a vehicle while transporting cannabis or cannabis products.

1           23. Title 4 of the California Code of Regulations, section 17800, states:

2           (a) The Department and its authorized representatives, for purposes of  
3           inspection, investigation, review, or audit, shall have full and immediate access to:

4           (1) Enter any premises licensed by the Department.

5           (2) Inspect and test any vehicle or equipment possessed by, in control of, or  
6           used by a licensee or their agents and employees for the purpose of conducting  
7           commercial cannabis activity.

8           (3) Test any cannabis goods or cannabis-related materials or products possessed  
9           by, in control of, or used by a licensee or their agents and employees for the purpose  
10           of conducting commercial cannabis activity.

11           (4) Copy any materials, books, or records of any licensee or their agents and  
12           employees.

13           (b) Failure to cooperate with and participate in any Department investigation  
14           pending against the licensee may result in a licensing violation subject to discipline.  
15           This subsection shall not be construed to deprive a licensee of any privilege  
16           guaranteed by the Fifth Amendment to the Constitution of the United States, or any  
17           other constitutional or statutory privileges. This subsection shall not be construed to  
18           require a licensee to cooperate with a request that would require the licensee to waive  
19           any constitutional or statutory privilege or to comply with a request for information or  
20           other matters within an unreasonable period of time in light of the time constraints of  
21           the licensee's business. Any constitutional or statutory privilege exercised by the  
22           licensee shall not be used against the licensee in a regulatory or disciplinary  
23           proceeding against the licensee.

24           (c) Prior notice of an inspection, investigation, review, or audit is not required.

25           (d) Any inspection, investigation, review, or audit of a licensed premises shall  
26           be conducted anytime the licensee is exercising privileges under the license, or as  
27           otherwise agreed to by the Department and the licensee or its agents, employees, or  
28           representatives.

29           (e) If the licensed premises is not accessible because access is only available by  
30           going through another licensed premises and the licensee occupying the other  
31           licensed premises denies the Department access, the licensees shall both be held  
32           responsible and subject to discipline.

## **COST RECOVERY**

33           24. Section 26031.1 of the Code states:

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

38           (b) A certified copy of the actual costs, or a good faith estimate of costs where  
39           actual costs are not available, signed by the department or its designated  
40           representative shall be *prima facie* evidence of reasonable costs of investigation and  
41           prosecution of the case. The costs shall include the amount of investigative and

1 enforcement costs up to the date of the hearing, including, but not limited to, charges  
2 imposed by the Attorney General.

3 (c) The administrative law judge shall make a proposed finding of the amount  
4 of reasonable costs of investigation and prosecution of the case when requested  
5 pursuant to subdivision (a). The finding of the administrative law judge with regard to  
6 costs shall not be reviewable by the department to increase the cost award. The  
7 department may reduce or eliminate the cost award, or remand to the administrative  
8 law judge if the proposed decision fails to make a finding on costs requested pursuant  
9 to subdivision (a).

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

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

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

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

24 (g) All costs recovered under this section shall be considered a reimbursement  
25 for costs incurred and shall be deposited into the Cannabis Control Fund to be  
available upon appropriation by the Legislature.

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

28 **FACTUAL ALLEGATIONS**

29 25. On or about February 12, 2025, Department staff went to Respondent's licensed  
30 premises during normal business hours to conduct an unannounced regulatory compliance  
31 inspection. At that time, Respondent's California Cannabis Track and Trace account reflected  
32 that there should be 12,602 cannabis packages, totaling 854,517 packaged cannabis items and  
33 96,334 pounds of bulk cannabis, physically present at the licensed premises. The licensed  
34 premises was locked, and no one responded when Department staff knocked on both the front and  
35 back door entrances. Department staff attempted to contact Owner Corben via telephone and text  
36

1 message, but he did not respond. After waiting approximately 45 minutes, Department staff left  
2 Respondent's licensed premises.

3 26. Later that day, after having received no response from Owner Corben, a Notice to  
4 Comply (NTC) was sent to Owner Corben requesting the following: access to the licensed  
5 premises, video surveillance footage of all exterior and interior cameras from January 1, 2025  
6 through February 12, 2025, and business records showing all outbound transfer invoices licensee  
7 "LBAS", all inbound transfer invoices to Respondent from January 1, 2025, to February 12, 2025,  
8 employee records for all individuals employed by Respondent from January 1, 2024, to February  
9 12, 2025, and all transport vehicle registration(s) and proof of insurance for all vehicles used by  
10 Respondent.

11 27. On or about February 13, 2025, Respondent submitted four separate emails  
12 responding to the NTC. Respondent provided 33 transfer invoices from Respondent to licensee  
13 "LBAS" and California Department of Motor Vehicles (DMV) registration for a 2011 Ford E350,  
14 which Owner Corben stated was not operating and a DMV registration for a 2003 Ford F-150.  
15 The vehicles were not registered to Respondent, or any other person associated with Respondent.  
16 Respondent stated that it had no employees from January 1, 2025, to January 10, 2025, and  
17 needed additional time to ascertain employee information for the period covering January 11,  
18 2025, to February 12, 2025. Respondent did not provide inbound transfer invoices. In addition,  
19 Respondent did not provide a date and time for Department staff to conduct a regulatory  
20 compliance inspection but stated "winter business hours are not full time."

21 28. A review of the transfer manifests submitted by Respondent showed that Respondent  
22 failed to submit invoices for transfer manifests 0007610205 and 0008154397; and the quantity on  
23 invoice 01032024-001 (Quantity: 6) and the quantity recorded on the correlating manifest  
24 0006328871 (Quantity: 2541 g) did not match.

25 29. On or about February 13, 2025, Department staff reviewed CCTT account  
26 information for Respondent and saw that from January 1, 2025, to February 12, 2025, Respondent  
27 accepted 212 inbound shipping manifests listing itself as the transporter. The transfer manifests  
28 recorded that the transfers were performed by 112 distinct drivers using 124 distinct vehicles.

1           30. On or about February 14, 2025, Department staff reviewed Respondent's CCTT  
2 account and noted that Respondent began creating outbound transfer manifests on February 12,  
3 2025, exclusively to "HBC" a licensed distributor. The review showed that on or about February  
4 12, 2025, Respondent created 36 manifests to "HBC" recording the transfer of approximately  
5 96,000 lbs. of cannabis flower, leaf, kief, or shake; and 852,000 units of packaged cannabis  
6 concentrates, extracts, vape cartridges, pre-rolls, flower, edibles, tinctures, and topicals. Of the  
7 units transferred, 288,478 units were transferred without completion of regulatory compliance  
8 testing. The 36 transfer manifests generated on February 12, 2025, indicated a single driver,  
9 "HF" and a single vehicle, conducting the transfers for Respondent. All the transfer manifests  
10 were created by Respondent and accepted by "HBC" between 6:13 p.m. and 6:59 p.m. on  
11 February 12, 2025.

12           31. Respondent's CCTT account review also showed that between February 13, 2025,  
13 and February 14, 2025, Respondent generated three transfer manifests transferring an additional  
14 612 packages. A review of 39 total transfers in CCTT between Respondent and "HBC" showed  
15 that the outbound transfer manifests were created by CCTT User ID Name(s), "EA" or "PC" both  
16 listed as Respondent's employees in the CCTT system, but not reported as employees by Owner  
17 Corben.

18           32. On or about March 5, 2025, Department staff conducted a regulatory compliance  
19 inspection of "HBC's" licensed premises and found no cannabis or cannabis products present.  
20 "HBC" staff denied receiving any cannabis or cannabis products from Respondent or knowledge  
21 of where the cannabis or cannabis products that had been accepted in the "HBC" CCTT account  
22 were located.

23           33. Also, on or about March 5, 2025, Department staff went to Respondent's licensed  
24 premises during normal business hours to conduct a regulatory compliance inspection, however  
25 the building was locked. Department staff called Owner Corben and left a voicemail message  
26 and sent a text message to Owner Corben requesting access to the licensed premises. After  
27 waiting and receiving no response from Owner Corben, Department staff left the licensed  
28 premises.

34. On or about March 27, 2025, Department staff reviewed Respondent's CCTT account. From the available information, between February 12, 2025, through March 27, 2025, Respondent had created a total of 791 manifests, listing 332 distinct transport drivers and 402 distinct transport vehicles.

35. On or about May 22, 2025, Department staff reviewed Respondent's active cannabis inventory in its CCTT account and generated a package report from its CCTT account which showed 28,727 active cannabis packages in Respondent's inventory accounting for 1,268,127 cannabis products and 231,858 pounds of bulk cannabis. Of the active packages, 634,877 cannabis products and 225,864 pounds of cannabis had not undergone regulatory compliance testing. In addition to the untested cannabis and cannabis products, 8,938 items had failed regulatory compliance testing and there had been no remediation plan submitted to the Department.

36. To date, Respondent has not provided the Department with access to its licensed premises, and has not provided requested video surveillance footage, and other outstanding records

## **FIRST CAUSE FOR DISCIPLINE**

### (Premises Requirement)

37. Respondent is subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d), and 17800, subdivision (a), for failing to provide the Department with access to the licensed premises as more particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

## **SECOND CAUSE FOR DISCIPLINE**

(Records: General Requirements, Inspection, Maintenance)

38. Respondent is further subject to disciplinary action under Code sections 26030, subdivisions (a) and (c), and 26160, subdivisions (a) through (e), and California Code of Regulations, title 4, sections 15037, subdivision (a), 15044, subdivision (i), 15047.2, and 15312, subdivision (a) for failing to maintain accurate records and provide records for inspection to the

1      Department as more particularly alleged in paragraphs 25 through 36, above, which are hereby  
2      incorporated by reference and realleged as if fully set forth herein.

3      **THIRD CAUSE FOR DISCIPLINE**

4      (Requirements for Transportation of Cannabis)

5      39. Respondent is further subject to disciplinary action under Code section 26030,  
6      subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15311, subdivision  
7      (a), and 15313, subdivision (b), in that Respondent reported no employees and one operational  
8      vehicle for its business, however, between January and March 2025, utilized 332 separate  
9      transport drivers and 402 different vehicles for cannabis transportation as more particularly  
10     alleged in paragraphs 25 through 36, above, which are hereby incorporated by reference and  
11     realleged as if fully set forth herein.

12     **FOURTH CAUSE FOR DISCIPLINE**

13     (Transportation and Regulatory Compliance Testing)

14     40. Respondent is further subject to disciplinary action under Code sections 26030,  
15     subdivisions (a) and (c), and 26110, subdivision (g), and California Code of Regulations, title 4,  
16     section 15306, subdivision (c), in that Respondent transported cannabis goods that had not been  
17     submitted for or passed regulatory compliance testing to other licensed distributors as more  
18     particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by  
19     reference and realleged as if fully set forth herein.

20     **FIFTH CAUSE FOR DISCIPLINE**

21     (Licensed Distributor to Licensed Distributor Transfers)

22     41. Respondent is further subject to disciplinary action under Code section 26030,  
23     subdivisions (a) and (c), and 26110, subdivision (g), and California Code of Regulations, title 4,  
24     section 15307.2, subdivision (a), in that Respondent received from another licensed distributor  
25     cannabis goods that had not been submitted for or passed regulatory compliance testing as more  
26     particularly alleged in paragraphs 25 through 36, above, which are hereby incorporated by  
27     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 issue a decision:

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Distributor License Number C11-0001142-LIC, issued to Respondent Pacific Shield Vertical Inc. with Kenneth Corben, Owner;

2. Ordering Respondent Pacific Shield Vertical Inc. with Kenneth Corben, Owner to pay the Department of Cannabis Control 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 Pacific Shield Vertical Inc. with Kenneth Corben, at Respondent's expense if revocation of Cannabis - Distributor License Number C11-00011421-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: July 11, 2025

Evelyn Schaeffer

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

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CCS Accusation.docx

1 ROB BONTA  
2 Attorney General of California  
3 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 State Bar No. 198769  
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San Diego, CA 92101  
5 Telephone: (619) 738-9407  
Facsimile: (916) 732-7920  
E-mail: Harinder.Kapur@doj.ca.gov  
6 *Attorneys for Complainant*

7

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

10

11 In the Matter of the Accusation Against:

Case No. DCC25-0000322-INV

12 **PACIFIC SHIELD VERTICAL INC.;**  
**KENNETH CORBEN, OWNER**

**REQUEST FOR DISCOVERY**

13 Respondent.

14

15 TO RESPONDENT:

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

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

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

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

26 a. A statement of a person, other than the Respondent, named in the  
27 initial administrative pleading, or in any additional pleading, when it is claimed that

28 ///

1 the act or omission of the Respondent as to this person is the basis for the  
2 administrative proceeding;

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

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

8 d. All writings and things which the Respondent now proposes to  
9 offer in evidence;

10 e. Any other writing or thing which is relevant, and which would be  
11 admissible in evidence pertaining to the persons named in the pleading;

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

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

22 For the purpose of this Request for Discovery, "statements" include written statements by  
23 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical  
24 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or  
25 summaries of these oral statements.

26 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery  
27 should be deemed to authorize the inspection or copying of any writing or thing which is

28 ///

1      privileged from disclosure by law or otherwise made confidential or protected as attorney's work  
2      product.

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

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

9      Dated: July 11, 2025

10     ROB BONTA  
11     Attorney General of California

12     *Harinder Kapur*

13     HARINDER K. KAPUR  
14     Senior Assistant Attorney General  
15     *Attorneys for Complainant*

16     LA2025802197  
17     85236449.docx

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

In the Matter of the Accusation Against:

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN AS OWNER,**

Respondent.

Case No. DCC25-0000322-INV

**NOTICE OF DEFENSE**

(Gov. Code §§ 11505 and 11506)

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>.

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

In the Matter of the Accusation Against:

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KENNETH CORBEN AS OWNER,**

Respondent.

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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.

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**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 E-MAIL, CERTIFIED MAIL**  
**AND FIRST CLASS MAIL**  
(Separate Mailings)

Case Name: **In the Matter of the Accusation against Pacific Shield Vertical Inc**

Case No.: **DCC25-0000322-INV**

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. My business address is: 600 West Broadway, Suite 1800, San Diego, CA 92101. My electronic service address is Mary.Kretsch@doj.ca.gov. 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 July 11, 2025, I served the attached **STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 copies); and 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; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 copies); and 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 600 West Broadway, Suite 1800, San Diego, CA 92101, addressed as follows:

Kenneth Corben  
Pacific Shield Vertical Inc.  
1443 W. Anaheim Street  
Long Beach, CA 90813

**Email addresses:**

ken@pacificshielddistribution.com  
ken.d3d@gmail.com

**Certified Article Number**

**9414 7266 9904 2237 9024 59**

**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 July 11, 2025, at San Diego, California.

M. Kretsch  
Declarant

  
Signature

## Exhibit 2

License History Certification for Respondent



## Cannabis Distributor License Adult-Use and Medicinal

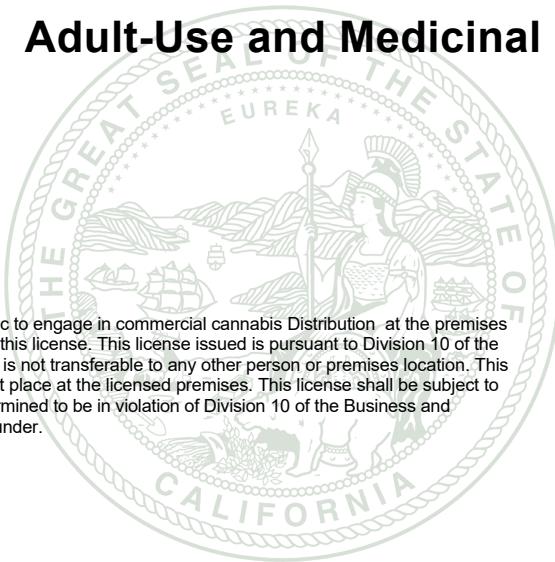
**Business Name:**  
Pacific Shield Vertical Inc

Pacific Shield Vertical Inc

**License Number:** C11-0001142-LIC

**License Type:** Distributor

The license authorizes Pacific Shield Vertical Inc to engage in commercial cannabis Distribution 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:**  
1443 W ANAHEIM ST  
LONG BEACH, CA 90813

**Valid:** 1/18/2020  
**Expires:** 1/17/2026

Scan to verify this  
license.



Non-Transferable

Post in Public View

# Scan to verify this license.



**Valid:**  
1/18/2020

**Expires:**  
1/17/2026

**License No:**  
C11-0001142-LIC

**Legal Business Name:**  
Pacific Shield Vertical Inc  
Pacific Shield Vertical Inc

**Premises Address:**  
1443 W ANAHEIM ST  
LONG BEACH, CA 90813

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 [search.cannabis.ca.gov](http://search.cannabis.ca.gov) using license number C11-0001142-LIC.



Department of  
Cannabis Control  
CALIFORNIA

## 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. DCC25-0000322-INV

**PACIFIC SHIELD VERTICAL INC.;  
KENNETH CORBEN, OWNER  
1443 W. Anaheim Street  
Long Beach, CA 90813**

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

**Cannabis - Distributor License  
No. C11-0001142-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) and have personal knowledge of the facts stated herein.

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 February 12, 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 system of the Department's Compliance Division for the reasonable and necessary investigative

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

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

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

20       a) Field Time:

21               Rate per hour: \$101.00 multiplied by 29 hours = \$2,919

22       b) Research and Report Writing:

23               Rate per hour: \$101.00 multiplied by 115 hours = \$11,615

24       c) Meetings:

25               Rate per hour: \$101.00 multiplied by 20 hours = \$2,020

26       d) Use of State Vehicles:

27               2 vehicles at \$.58 per mile multiplied by 552 miles = \$320.16

28       I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct and that this declaration was executed in Sacramento County  
2 on August 13, 2025.

3 White,

4 Travis@Cannabis

5 Digitally signed by White,  
6 Travis@Cannabis  
7 Date: 2025.08.13 10:57:40 -07'00'  
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9 TRAVIS WHITE  
10 *Declarant*

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Last Name	First Name	Hourly Rate	Field Time	Research and Report	Meetings	Total Hours	Total Expense
Lead SI, Lucchesi	Traci	\$101.00		12.5	95	5	112.5 \$11,362.50
SI, McLean	Matthew	\$101.00		2	0	0	2 \$202.00
Supervising SI I, White	Travis	\$101.00		2	20	15	37 \$3,737.00
SI, Wallis	Carlos	\$101.00		12.5	0	0	12.5 \$1,262.50
<b>Total Personnel Services</b>							<b>\$16,564.00</b>

<b>Total Personnel Services and Operating Expense</b>	<b>\$16,884.16</b>
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Operating Expense	Count	Miles	@.58 per mile
State Vehicles	2	552	\$320.16
U-Haul Rental			\$0.00
U-Haul Gas			\$0.00
<b>Total Operating Expense</b>			<b>\$320.16</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 MICHAEL DUONG  
6 Deputy Attorney General  
7 State Bar No. 327666  
8 1300 I Street, Suite 125  
9 Sacramento, CA 95814  
10 Telephone: (916) 210-6807  
11 Facsimile: (916) 327-8643  
12 E-mail: Michael.Duong@doj.ca.gov  
13 *Attorneys for Complainant*

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

In the Matter of the Accusation Against:

Case No. DCC25-0000322-INV

**PACIFIC SHIELD VERTICAL INC.;**  
**KENNETH CORBEN, OWNER**

**CERTIFICATION OF**  
**PROSECUTION COSTS:**  
**DECLARATION OF MICHAEL DUONG**

Respondent.

[Business and Professions Code section  
26031.1]

I, MICHAEL DUONG, hereby declare and certify as follows:

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

2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance Division of the Department of Cannabis Control, in this action. I was assigned to handle this case on or about August 6, 2025.

1       3. Our Office's computerized case management system reflects that the following persons have  
2 also performed tasks related to this matter: Harinder Kapur, Senior Assistant Attorney General;  
3 Gregory Cribbs, Senior Deputy Attorney General; Helen Koh, Senior Legal Analyst; and Michael  
4 Duong, Deputy Attorney General.

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

10       5. On September 4, 2025, I requested a billing summary for this case from the  
11 Accounting Department of the DOJ. In response, on September 4, 2025, I received a document  
12 entitled "Matter Time Activity by Professional Type." I hereby certify that the Matter Time  
13 Activity by Professional Type, attached hereto as Exhibit A, and herein incorporated by  
14 reference, is a true and correct copy of the billing summary for this matter that I received from the  
15 Accounting Department. The summary includes the billing costs incurred by me, as well as other  
16 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the  
17 amount of time billed for the activity, and the billing rate by professional type. The billing  
18 summary is comprehensive of the charges by the Office to the Department of Cannabis Control  
19 through September 4, 2025.

20       6. Based upon the time reported through September 4, 2025, as set forth in Exhibit A,  
21 DOJ has billed the Department of Cannabis Control \$3,621.75 for the time spent working on the  
22 above-entitled case.

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

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

5           Executed on 9/4/25, in the City of Sacramento, California.

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7           \_\_\_\_\_  
8           MICHAEL DUONG  
9           Deputy Attorney General  
10           Declarant

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Declaration of Costs.docx

## **Exhibit A**



## Cost of Suit Summary

As of Sep 4, 2025

MatterID: LA2025802197	Date Opened: Jul 3, 2025	Total Legal Costs: \$3,621.75
Description: Pacific Shield Vertical Inc. (EDO/ACC)		Cost of Suit: \$0.00
		Grand Total: \$3,621.75

*Totals include WIP time.*

Rate	Hrs Wrkd	Amount
<b>Matter Time Activity Summary</b>		
<b>Attorney</b>		
2025-2026		
\$228.00	14.25	\$3,249.00
Total For:	2025-2026	\$3,249.00
Total for:	Attorney	\$3,249.00
<b>Paralegal</b>		
2025-2026		
\$213.00	1.75	\$372.75
Total For:	2025-2026	\$372.75
Total for:	Paralegal	\$372.75
<b>Total Legal Costs</b>		\$3,621.75

Entry No	Journal Date	Vendor #	Vendor	Schedule	Reference	Amount
<b>Cost of Suit</b>						
* Denotes soft costs which are not included in totals.						



## Matter Time Activity By Professional Type

As of Sep 4, 2025

Matter ID: LA2025802197

Date Opened: 07/03/2025

Description: Pacific Shield Vertical Inc. (EDO/ACC)

Professional Type: Attorney

Fiscal Year: 2025

Professional: Gregory M. Cribbs

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605683065	7/7/25	CV-CCS:290	02668	Supervisory Review	1.25	\$228.00	\$285.00		7/31/25
605746308	8/14/25	CV-CCS:290	02668	Supervisory Review	0.75	\$228.00	\$171.00		
Gregory M. Cribbs Totals:					2.00		\$456.00		

Professional: Harinder K. Kapur

803193828	7/3/25	CV-CCS:290	02668	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		7/31/25
803194197	7/3/25	CV-CCS:290	02668	Pleading Preparation	1.25	\$228.00	\$285.00		7/31/25
950401786	7/7/25	CV-CCS:290	02668	Pleading Preparation	3.50	\$228.00	\$798.00		7/31/25
803198401	7/10/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$228.00	\$171.00		7/31/25
Harinder K. Kapur Totals:					6.25		\$1,425.00		

Professional: Michael Duong

307781866	8/13/25	CV-CCS:290	02668	Pleading Preparation	2.50	\$228.00	\$570.00		
307784586	8/14/25	CV-CCS:290	02668	Pleading Preparation	2.25	\$228.00	\$513.00		
307786696	8/15/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
307787171	8/15/25	CV-CCS:290	02668	Client Communication	0.75	\$228.00	\$171.00		
307787624	8/15/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
Michael Duong Totals:					6.00		\$1,368.00		
2025 Totals:					14.25		\$3,249.00		
Attorney Totals:					14.25		\$3,249.00		



## Matter Time Activity By Professional Type

As of Sep 4, 2025

Matter ID: LA2025802197

Date Opened: 07/03/2025

Description: Pacific Shield Vertical Inc. (EDO/ACC)

Professional Type: Paralegal

Fiscal Year: 2025

Professional: Helen Koh

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803193809	7/3/25	CV-CCS:290	02668	Case Management	1.25	\$213.00	\$266.25		7/31/25
803198421	7/10/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$213.00	\$106.50		7/31/25
				Helen Koh Totals:	1.75		\$372.75		
				2025 Totals:	1.75		\$372.75		
				Paralegal Totals:	1.75		\$372.75		
				LA2025802197 Totals:	16.00		\$3,621.75		

# Exhibit 5

Return Receipts from the United States Postal Service

**U.S. Postal Service®  
CERTIFIED MAIL® RECEIPT**

*Domestic Mail Only*

**USPS® ARTICLE NUMBER**

9414 7266 9904 2237 9024 59

Certified Mail Fee      \$

Return Rec



k

Postage      9590 9266 9904 2237 9024 52

Total Postage and Fees      \$

Sent to:

Kenneth Corben  
Pacific Shield Vertical Inc.  
1443 W. Anaheim Street  
Long Beach, CA 90813

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**Reference Information**

Harinder H. Kapur

LA2025802197

ONE WAY  
RETURN RECEIPT REQUESTED  
USPS® MAIL CARRIER  
DETACH ALONG PERFORATION

Return Receipt (Form 3811) Barcode



9590 9266 9904 2237 9024 52

1. Article Addressed to:  
Kenneth Corben  
Pacific Shield Vertical Inc.  
1443 W. Anaheim Street  
Long Beach, CA 90813

2. Certified Mail (Form 3800) Article Number

9414 7266 9904 2237 9024 59

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

3. Service Type:

Certified Mail

Reference Information

LA2025802197/Corben/Acc Pkt  
Harinder H. Kapur

PS Form 3811, Facsimile, July 2015

Domestic Return Receipt

Thank you for using Return Receipt Service

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

Harinder H. Kapur  
Office of the Attorney General  
600 West Broadway, Suite 1800  
San Diego, CA 92101

CERTIFIED MAIL



9414 7266 9904 2237 9024 59



Kenneth Corben  
Pacific Shield Vertical Inc.

NIXIE 910 7E 18CU 7207/16/25

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 92101337550 2347N197175-01039

# Exhibit 6

Investigative Report (without attachments) [Case No. DCC25-0000322-INV]

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

Case Number <b>DCC25-0000322-INV</b>	Date Received
License Number <b>C11-0001142-LIC</b>	Legal Business Name of Licensee or Unlicensed Party <b>Pacific Shield Vertical Inc.</b>
DBA	Premises Address <b>1443 W. Anaheim Street, Long Beach, CA 90813</b>
Business Phone Number <b>(562) 270-4285</b>	Author's Name <b>Traci Lucchesi</b>
Date of Incident <b>February 12, 2025</b>	Location of Incident <b>1443 W. Anaheim Street, Long Beach, CA 90813</b>

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

Name (First, Middle, Last) <b>Kenneth Corben</b>	Title <b>Owner Applicant</b>
Address (include street, city, state, and zip code) <b>1443 W. Anaheim Street, Long Beach, CA 90813</b>	
E-mail Address <b>lbccompliance@outlook.com</b>	Phone Number <b>(562) 270-4285</b>
Miscellaneous Information <b>///</b>	

**SUMMARY**

On February 12, 2025, and March 5, 2025, I, Department of Cannabis Control (Department) Special Investigator (SI) Traci Lucchesi along with SI Carlos Wallis (Wallis), arrived at the licensed premises for Pacific Shield Vertical Inc., (Pacific Shield) located at 1443 W. Anaheim Street, Long Beach, CA 90813. The Pacific Shield premises contains a distribution license, number C11-0001142-LIC. I attempted to conduct a regulatory compliance inspection but was not provided with access to the premises. I attempted to contact Pacific Shield's owner, Kenneth Corben (Corben), but Corben was not responsive, despite recent activity in the licensee's California Cannabis Track and Trace (CCTT) account.

On March 5, 2025, Supervising Special Investigator I (SSI I) Travis White (White) and SI Matthew McLean (McLean) returned to Pacific Shield's licensed premises. SSI I White and SI McLean attempted to conduct an inspection but were not provided with access to the premises. I attempted to contact Corben, but Corben continued to be non-responsive despite recent activity in the CCTT account.

Pacific Shield failed to provide the Department with immediate access to inspect the licensed premises, failed to ensure all commercial cannabis activities were accurately recorded in the METRC CCTT database, failed to ensure accuracy of cannabis quantities recorded on invoices and the correlating manifests, failed to ensure all drivers transporting cannabis packages were employees of the licensee, failed to ensure all vehicles used to transport cannabis packages for the licensee were either owned or leased by the licensee, and failed to provide records requested by the Department.



## BACKGROUND

Pacific Shield's Cannabis Distribution license (C11-0001142-LIC) is active. The license was issued to Pacific Shield on January 18, 2020, and will expire on January 17, 2026. Department licensing records show Kenneth Corben is the sole owner and owner applicant. David Vasquez is listed as a Primary Contact. In addition, according to Secretary of State records, Eleazar Alvarado (Alvarado) is Pacific Vertical's Chief Executive Officer, Chief Financial Officer, and Secretary since at least January 14, 2025, and on January 13, 2025, submitted an owner application to the Department. CCTT records also show that Alvarado has been a CCTT account user for Pacific Vertical since January 16, 2025 (**Attachment A**).

On February 12, 2025, after my attempted inspection, Pacific Shield's CCTT account reported a transfer of approximately 14,000 packages to another cannabis distributor licensee, Humming Byrd Consulting LLC (C11-0001520-LIC). Since the reported February 12, 2025, transfers, Pacific Shield's active cannabis package inventory has again increased. As of March 5, 2025, Pacific Shield's CCTT account reports the licensee has over an estimated 6,000 active cannabis packages.

On March 5, 2025, SSI White and SI McLean performed an inspection of both of Humming Byrd Consulting LLC's, active cannabis licenses (C11-0001520-LIC and CCL20-0003097) located at 615 and 615-633 E, 61<sup>st</sup> Street, Los Angeles, CA 90001 respectively. Both of Humming Byrd Consulting LLC's licensed premises did not have any cannabis onsite. The Humming Byrd Consulting LLC owner, Jami Burrows, reported that Humming Byrd Consulting, LLC did not receive the reported 14,000 cannabis package transfers.

## CASE NARRATIVE

On February 12, 2025, at approximately 1056 hours, SI Wallis and I arrived at the licensed premises for Pacific Shield located at 1443 W Anaheim Street, Long Beach, CA 90813 to conduct an unannounced inspection.

Upon arrival at Pacific Shield's licensed premises, I reviewed the licensee's CCTT account and generated a package report directly from the CCTT system. I reviewed Pacific Shield's CCTT account and the generated report. I discovered 12,602 cannabis packages were active and should have been physically present in the licensed premises. The active cannabis packages account for the following amounts of cannabis and cannabis products totaling 854,517 packaged cannabis items and 96,334 lbs. of bulk cannabis (**Attachment B**):

Item Type	Amount
Capsule (weight – each)	230
Edible (volume – each)	2,056
Edible (weight – each)	95,321
Extract (volume – each)	7,086
Extract (weight – each)	189,829
Flower (lbs.)	40,771
Flower (packaged – each)	3,619
Flower (packaged eighth – each)	166,495
Flower (packaged gram – each)	200
Flower (packaged half ounce –	4,510



## INVESTIGATION REPORT

each)	
Flower (packaged ounce – each)	1,516
Flower (packaged quarter – each)	1,096
Fresh Cannabis Plant (lbs.)	439
Kief (lbs.)	35
Leaf (lbs.)	16,361
Other Concentrate (volume – each)	36
Other Concentrate (weight – each)	39,392
Pre-Roll Flower	20,356
Pre-Roll Infused	113,212
Pre-Roll Leaf	803
Shake (lbs.)	38,738
Shake (packaged ounce – each)	105
Tincture (volume – each)	50
Topical (weight – each)	96
Vape Cartridge (volume – each)	35,697
Vape Cartridge (weight – each)	172,812

I knocked on the front secured gate of the facility and after waiting several minutes without a response, I walked away and around to the back door located at the rear of the licensed premises, which allowed public access from an alley driveway. I knocked on the back door and continued to receive no answer.

Approximately 10 minutes later, at 1106 hours, I called (562) 270-4285, the contact telephone number listed in Department licensing records for Corben, Pacific Shield's owner. I left a voicemail message requesting contact. Corben did not respond to my voicemail.

Approximately four minutes later, at 1110 hours, I sent a text message to Corben at (562) 270-4285, requesting contact. Corben did not respond to the text message.

SI Wallis and I continued to wait outside the licensed premises, and we did not see anyone arrive at or leave the licensed premises. Approximately 43 minutes later, at 1153 hours, we had not received a response from Corben and departed from the licensed premises.

Approximately 8 hours later, at 1957 hours, I still had not received a response from Corben, and I emailed a Notice to Comply (NTC) to Pacific Shield at [lbccompliance@outlook.com](mailto:lbccompliance@outlook.com) and [ken@pacificshielddistribution.com](mailto:ken@pacificshielddistribution.com), the contact emails listed in Department licensing records for Corben (**Attachment C**).

The NTC notified Corben of my attempt to perform an inspection at the licensed premises of Pacific Shield, C11-0001142-LIC, located at 1443 W. Anaheim Street, Long Beach, CA 90813. In the NTC, I requested immediate access to the Pacific Shield licensed premises, video surveillance footage of all exterior and interior cameras of Pacific Shield's licensed premises from January 1, 2025, to February 12, 2025, and the following business records:

- All outbound transfer invoices to LB Anaheim Street LLC;
- All inbound transfer invoices to Pacific Shield from January 1, 2025, to February 12, 2025;



## INVESTIGATION REPORT

- Employee records for all individuals employed by Pacific Shield from January 1, 2024, to February 12, 2025; and
- All transport vehicle registration(s) and proof of insurance for all vehicles used by Pacific Shield.

On February 13, 2025, I received four emails from [LBCcompliance@outlook.com](mailto:LBCcompliance@outlook.com) from an individual representing himself as Kenneth Corben in response to the NTC issued to Pacific Shield. The four email responses to the NTC contained the following, in summary:

- In response to the request for outbound transfer invoices, Corben submitted 33 transfer invoices from Pacific Shield to licensed cannabis manufacturer LB Anaheim Street, LLC (CDPH-10003420) (**Attachment D**)
- In response to the request for invoices for Pacific Shield's inbound transfers, Corben stated he requires more time to submit the inbound transfer invoices (**Attachment E**). As of the date of this report I have not received the requested records.
- In response to the request for employee records, Corben reported that he did not have any employees from January 1, 2024, to January 10, 2025. Additionally, he needed more time to ask, "new management" if there were new individuals employed from January 10, 2025, to February 12, 2025 (**Attachment F**). As of the date of this report I have not received the requested employee records or a response from Corben identifying any employees from the "new management".
- In response to the requested transport vehicles used by Pacific Shield, Corben submitted a California Department of Motor Vehicles (DMV) registration for a 2011 Ford E350, which he stated was not operating and a DMV registration for a 2003 Ford F-150. The vehicles were not registered to Pacific Shield or any other person associated with Pacific Shield in Department licensing records (**Attachment G**).
- In response to the request for access to the Pacific Shield licensed premises, Corben responded within the NTC, stating, "winter business hours are not full time" (**Attachment H**). Corben did not provide a date and time for Department staff to complete an inspection. As of the date of this report Corben has not scheduled an appointment with the Department.

I further reviewed the invoices Corben submitted on February 13, 2025 (**see Attachment D**). I discovered the following, in summary:

- Corben did not submit invoices for transfer manifests 0007610205 and 0008154397 for Departmental review (**Attachment I**).
- The quantity on invoice 01032024-001 (Quantity: 6) and the quantity recorded on the correlating manifest 0006328871 (Quantity: 2541 g) do not match (**Attachment J**). The distributor shall only transport cannabis and cannabis products listed on the sales invoice or receipt and must be listed on a corresponding transfer manifest.

On February 13, 2025, I reviewed CCTT Records for Pacific Shield and discovered, from January 1, 2025, to February 12, 2025, Pacific Shield accepted 212 inbound shipping manifests listing Pacific Shield as the



## INVESTIGATION REPORT

transporter. I generated a report using TABLEAU, a data analytics software utilized by the Department to extract CCTT data and compiled the data on Pacific Shield's shipping manifests for that timeframe into a searchable document (**Attachment K**). I discovered. The transfer manifests recorded that the transfers were performed by 112 distinct drivers and 124 distinct vehicles. The transport of cannabis can only be performed by an employee directly employed by the licensee and using a vehicle owned or leased by the licensee. Corben reported that Pacific Shield does not have any employees and only uses two different transport vehicles (**see Attachments F and G**).

On February 14, 2025, I reviewed Pacific Shield's CCTT account and discovered Pacific Shield began creating outbound transfer manifests on February 12, 2025, exclusively to Humming Byrd Consulting LLC's distribution premises (C11-0001520-LIC) despite Corben failing to respond to my request for access. I discovered a significant decrease in packages following my attempted inspection. The transfers reduced Pacific Shield's active package count from approximately 12,602 to 34 through a total of 39 outbound transfer manifests conducted between February 12, 2025, and February 14, 2025.

I reviewed the CCTT transfer details for the transfers from Pacific Shield to Humming Byrd Consulting LLC. I discovered that on February 12, 2025, the date of my attempted inspection, Pacific Shield created 36 manifests to Humming Byrd Consulting LLC (**Attachment L**). I generated a report of the manifest's content from the CCTT system. I discovered Pacific Shield created transfer manifests recording the transfer of approximately 96,000 lbs. of cannabis flower, leaf, kief, or shake; and 852,000 units of packaged cannabis concentrates, extracts, vape cartridges, pre-rolls, flower, edibles, tinctures, and topicals (**Attachment M**).

In review of the cannabis products, I discovered that 288,478 units were transferred by Pacific Shield to Humming Byrd Consulting LLC without previous completion of regulatory compliance testing as required by regulation. Because these products were not tested by the originating distribution license, any proceeding regulatory compliance testing would be inappropriately conducted and would not be representative of the entirety of the cannabis product batch. The safety of cannabis products cannot be verified and the cannabis products cannot legally move forward in the licensed cannabis marketplace or be sold at retail.

Additionally, between February 13, 2025, and February 14, 2025, Pacific Shield generated an additional three transfer manifests transferring an additional 612 packages (**Attachment N**). I reviewed the 39 total transfers in CCTT between Pacific Shield and Humming Byrd Consulting LLC in detail and discovered that the outbound transfer manifests were created by CCTT User ID Name(s), Eleazar Alvarado ([pacshield.metrc@gmail.com](mailto:pacshield.metrc@gmail.com)) or Patty Coleman ([pcoleman42090@gmail.com](mailto:pcoleman42090@gmail.com)) both listed as employees of Pacific Shield in the CCTT system, as seen for example on the CCTT screenshots for manifest numbers 0008378615 and 0008385952 (**Attachment O**). Corben did not previously report Eleazar Alvarado and Patty Coleman as employees of Pacific Shield.

The 36 transfer manifests generated on February 12, 2025, show a single driver, Hector Flores (Flores) and a single vehicle, Mercedes Benz Sprinter (license plate #12379C1) conducting the transfers for Pacific Shield, and that the 36 transfers were completed in approximately 46 minutes. The transfer manifests were all created by Pacific Shield and accepted by Humming Byrd Consulting LLC between 6:13 PM and 6:59 PM.

The distance between the licensed premises of Pacific Shield, located at 1443 W. Anaheim Street, Long Beach, CA 90813 and the destination licensed premises of Humming Byrd Consulting LLC, located at 615



## INVESTIGATION REPORT

E 61<sup>st</sup> Street, Los Angeles, CA 90001 is an estimated 18 miles, 30 minutes of one-way travel time, according to Google Maps, [www.google.com/maps](http://www.google.com/maps) (**Attachment P**).

In my training and experience, I have witnessed the transport of large volumes and weights of cannabis and cannabis product. In my experience, 20-25 pounds of dry cannabis occupies approximately 4 cubic feet of space. The transport vehicle on the shipping manifests between Pacific Shield and Humming Byrd is identified as a Mercedes Benz Sprinter. The Mercedes Benz Sprinter in its largest configuration has a listed cargo capacity of 533 cubic feet (**Attachment Q**). In an ideal loading scenario with all available cargo space utilized, the largest configuration Mercedes Benz Sprinter would be capable of transporting 2,665 pounds of cannabis in a single load.

The transfers between Pacific Shield and Humming Byrd accounted for the transfer of approximately 96,000 pounds of cannabis which would require 36 round trips between the two premises. The drive time between Pacific Shield and Humming Byrd would take the transport driver approximately 36 hours. This time does not factor in additional traffic or time to load and unload the vehicle at each premises. Additionally, this estimate does not factor in the additional transfer of the 852,000 units of packaged cannabis concentrates, extracts, vape cartridges, pre-rolls, flower, edibles, tinctures, and topicals. The times recorded in CCTT for completing the transfer of cannabis packages between Pacific Shield And Humming Byrd are an impossibility.

I know from my training and experience, when an inspection is attempted, a cannabis licensee engaging in diversion of cannabis and cannabis products or other illicit behavior may falsely report the transfer of cannabis packages out of the licensee's CCTT account to avoid detection of a large amount of missing cannabis or cannabis products from the physical inventory that should be located on the licensed premises.

On March 5, 2025, at approximately 14:00 hours. SSI White and SI McLean called me and reported that they were performing an inspection of both Humming Byrd Consulting LLC, active cannabis licenses (C11-0001520-LIC and CCL20-0003097) located at 615 and 615-633 E, 61<sup>st</sup> Street, Los Angeles, CA 90001. Both of Humming Byrd Consulting LLC's licensed premises did not have any cannabis onsite. SI McLean reported that the Humming Byrd Consulting LLC's licensed premises did not contain any cannabis or cannabis products. Additionally, SI Mclean reported that he spoke to Humming Byrd Consulting LLC's owner, Jami Burrows, and asked if Humming Byrd Consulting LLC, had received any transfers from Pacific Shield on or about February 13, 2025. Burrows stated Humming Byrd Consulting did not physically receive any transfers from Pacific Shield despite transfers being accepted into their CCTT account. SSI I White and SI Mclean reportedly asked Burrows if she knew where the physical product was located. Burrows said that she did not know where the product was located.

On March 5, 2025, at approximately 1530 hours, Department SSI I White and SI McLean called me on Microsoft Teams to inform me that they were at the Pacific Shield licensed premises attempting to conduct an inspection on my behalf. SSI I White and SI McLean showed me the exterior of a building I knew to be the licensed premises of Pacific Shield. SSI I White and SI Mclean informed me they knocked on the doors of the Pacific Shield premises, but did not receive an answer.

Upon the arrival of SSI I White and SI McLean at Pacific Shield's licensed premises, I generated a package report for Pacific Shield directly from the CCTT system. I reviewed Pacific Shield's CCTT account and discovered the licensee had approximately 6,643 active packages, representing 400,530 cannabis products and 43,140 pounds of bulk cannabis, which should have been located in Pacific Shield's licensed



## INVESTIGATION REPORT

premises. The active cannabis packages accounted for the following approximate amounts of cannabis and cannabis products (**Attachment R**):

Item Type	Amount
Capsule (weight – each)	17
Edible (weight – each)	12,455
Extract (volume – each)	1,307.2
Extract (weight – each)	35,893.21
Flower (lbs.)	28,317
Flower (packaged – each)	3,401
Flower (packaged eighth – each)	173,452
Flower (packaged gram – each)	99
Flower (packaged half ounce – each)	2,556
Flower (packaged ounce – each)	322
Flower (packaged quarter – each)	36
Fresh Cannabis Plant (lbs.)	342.9
Leaf (lbs.)	8,093.5
Other Concentrate (weight – each)	2,652
Pre-Roll Flower	19,474
Pre-Roll Infused	109,716
Pre-Roll Leaf	622
Shake (lbs.)	6,386.1
Tincture (volume – each)	210
Topical (weight – each)	108
Vape Cartridge (volume – each)	925
Vape Cartridge (weight – each)	37,285

Approximately 12 minutes later, at 1542 hours, I called (562) 270-4285, the contact telephone number listed in Department licensing records for Pacific Shield's owner, Corben. I left a voicemail message notifying Corben that Department staff was attempting to conduct a second regulatory compliance inspection at the licensed premises and was requesting contact and access to the premises. Corben did not respond to the voicemail.

Approximately 3 minutes later at 1545 hours, I sent a text to Corben at (562) 270-4285, requesting contact. Corben did not respond to the text message.

SI McLean and SSI I White remained on a Microsoft Teams call with me and continued to wait outside the licensed premises and did not see anyone arrive at or leave the licensed premises. Approximately 20 minutes later, at 1550 hours, I had not received a response from Corben. I notified SI McLean and SSI I White, and they departed from the licensed premises.

On March 27, 2025, I reviewed Pacific Shield's active cannabis inventory in its CCTT account. I generated a report directly from the CCTT system. Pacific Shield's CCTT account shows 12,827 active cannabis packages which represent 630,495 cannabis products and 94,827 pounds of bulk cannabis (**Attachment S**), which accounts for the following amounts of cannabis and cannabis products:



## INVESTIGATION REPORT

Item Type	Amount
Capsule (weight - each)	89
Edible (weight - each)	17,067
Extract (volume - each)	3,595
Extract (weight - each)	156,854
Flower (lbs.)	58,124
Flower (packaged - each)	4,362
Flower (packaged eighth - each)	188,582
Flower (packaged gram - each)	139
Flower (packaged half ounce - each)	2,913
Flower (packaged ounce - each)	418
Flower (packaged quarter - each)	44
Fresh Cannabis Plant	527
Infused Butter/Oil (weight - each)	18
Leaf (lbs.)	20,701
Other Concentrate (weight - each)	15,815
Pre-Roll Flower	19,241
Pre-Roll Infused	146,848
Pre-Roll Leaf	719
Shake (lbs.)	15,472
Tincture	350
Topical (volume - each)	120
Topical (weight - each)	174
Vape Cartridge (volume - each)	1,389
Vape Cartridge (weight - each)	71,756

On March 27, 2025, I generated a detailed report of the transfer manifests listed in CCTT associated with Pacific Shield using Tableau. I reviewed the details of all shipping manifests received by Pacific Shield, and accepted by Pacific Shield, with Pacific Shield listed as the manifest transporter, from the day following my attempted inspection on February 12, 2025, to March 27, 2025. There was a total of 791 manifests. I discovered the manifests list 332 unique transport drivers and approximately 402 vehicles used for the transports (**Attachment T**).

As of the date of this report, I have not been provided with access to the Pacific Shield licensed premises, I have not received requested video surveillance footage, and I have not received the remaining records requested in the NTC sent on February 12, 2025.

On May 22, 2025, I reviewed Pacific Shield's active cannabis inventory in its CCTT account. I generated a report directly from the CCTT system. Pacific Shield's CCTT account shows 28,727 active cannabis packages accounting for 1,268,127 packaged cannabis products and 231,858 pounds of bulk cannabis (**Attachment U**). The following shows the specific cannabis and cannabis products active in Pacific Shield's CCTT account:

Item Type	Amount
Capsule (weight - each)	101
Clone – Tissue Culture	1
Edible (weight - each)	53,106



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Extract (volume - each)	3,894
Extract (weight - each)	490,427
Flower (lbs.)	157,160
Flower (packaged - each)	1,047
Flower (packaged eighth - each)	207,331
Flower (packaged gram - each)	139
Flower (packaged half ounce - each)	5,146
Flower (packaged ounce - each)	939
Flower (packaged quarter - each)	468
Fresh Cannabis Plant (lbs)	1,616
Infused Butter/Oil (weight - each)	19
Kief (gr)	42
Leaf (lbs.)	42,759
Other Concentrate (volume – each)	910
Other Concentrate (weight - each)	53,996
Pre-Roll Flower	32,986
Pre-Roll Infused	228,892
Pre-Roll Leaf	914
Shake (lbs.)	30,323
Shake (packaged half ounce – each)	274
Shake (packaged ounce – each)	35
Tincture	684
Topical (volume - each)	142
Topical (weight - each)	256
Vape Cartridge (volume - each)	17,108
Vape Cartridge (weight - each)	164,310

In review of the active cannabis packages, I discovered 634,877 cannabis products and 225,864 pounds of cannabis did not receive regulatory compliance testing. The following shows the specific cannabis and cannabis products that have not received regulatory compliance testing:

Item Type	Amount
Clone – Tissue Culture	1
Edible (weight - each)	53,106
Extract (volume - each)	3,851
Extract (weight - each)	443,439
Flower (lbs.)	154,725
Flower (packaged - each)	692
Flower (packaged eighth - each)	3,030
Fresh Cannabis Plant (lbs)	1,616
Infused Butter/Oil (weight - each)	19
Kief (gr)	42
Leaf (lbs.)	42,697
Other Concentrate (volume – each)	910
Other Concentrate (weight - each)	43,677
Pre-Roll Flower	14,159



## INVESTIGATION REPORT

Pre-Roll Infused	44,557
Shake (lbs.)	26,826
Shake (packaged half ounce – each)	274
Shake (packaged ounce – each)	35
Vape Cartridge (volume - each)	17,108
Vape Cartridge (weight - each)	10,020

In addition to the untested cannabis and cannabis products, I discovered 8,938 items failed regulatory compliance testing. I reviewed Department records and did not find a remediation plan submitted to the department from Pacific Shield. The following shows the specific cannabis and cannabis products that have failed regulatory compliance testing:

Pre-Roll Flower	3,277
Vape Cartridge (weight - each)	5,661

In review of the cannabis products, I discovered that many of the cannabis products were transferred to Pacific Shield from other licensed cannabis distributors without previous completion of regulatory compliance testing as required by regulation. Because these products were not tested by the originating distribution license, any proceeding regulatory compliance testing would be inappropriately conducted and would not be representative of the entirety of the cannabis product batch. The safety of cannabis products cannot be verified and the cannabis products cannot legally move forward in the licensed cannabis marketplace or be sold at retail.

### WITNESS LIST

#### Witness #1

- Name: Traci Lucchesi
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (279) 217-3583
- E-mail:traci.lucchesi@cannabis.ca.gov
- Miscellaneous information: Lead investigator

#### Witness #2

- Name: Carlos Wallis
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (844) 612-2322
- E-mail:carlos.wallis@cannabis.ca.gov
- Miscellaneous information: Assisted with investigation

#### Witness #3

- Name: Kenneth Corben
- Title/Position: Licensee
- Address: 1443 W. Anaheim Street, Long Beach, CA 90813
- Phone: (562) 270-4285



## INVESTIGATION REPORT

- E-mail:lbccompliance@outlook.com
- Miscellaneous information: licensee

### Witness #4

- Name: Travis White
- Title/Position: Supervising Special Investigator I
- Address: 2920 Kilgore Road, Rancho Cordova, CA 95670
- Phone: (916) 693-3044
- E-mail:travis.white@cannabis.ca.gov
- Miscellaneous information: Supervised and assisted in investigation

### Witness #5

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

PREPARER	
Name Traci Lucchesi	Title Special Investigator
Signature Traci Lucchesi	Digitally signed by Traci Lucchesi Date: 2025.07.01 17:11:35 -07'00'
REVIEWER	
Name Travis White	Title Supervising Special Investigator I
Signature White, Travis@cannabis	Digitally signed by White, Travis@cannabis Date: 2025.07.01 17:16:08 -07'00'

## LIST OF ATTACHMENTS

- A. Active License and Contact Summary
- B. 2/12/2025 METRC Package Report
- C. 2/12/2025 Notice to Comply
- D. Email - Invoices to LB Anaheim Street, LLC
- E. Email – Requires More Time for Inbound Transfer Invoices
- F. Email – No Employee Records
- G. NTC Response – Vehicle Information
- H. NTC No Attempt to Schedule Inspection
- I. Manifests Missing Invoices
- J. Invoice & Manifest Quantities Do Not Match
- K. 1/1/2025 – 2/12/2025 Manifests with Transporter Detail
- L. 2/12/2025 (36) Transfer Manifests PSV to Humming Byrd
- M. Recorded Transfers Totaling 96,000 lbs. of Cannabis
- N. (3) Transfer Manifests 2.13.25 – 2.14.25
- O. Examples of CCTT User and Driver Name
- P. Google Maps Show 30 Minute Travel Time
- Q. Mercedes Benz Sprinter
- R. 3/5/2025 METRC Package Report
- S. 3/27/2025 Pacific Shield CCTT Package Report



## INVESTIGATION REPORT

T. 2/13/2025 – 3/27/2025 Pacific Shield Driver & Vehicle Details  
U. 5/22/25 METRC Package Report

## PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: Pacific Shield Vertical, Inc.  
DCC Case No. DCC25-0000322-INV  
License Number: C11-0001142-LIC, Distributor

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 September 11, 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.

Pacific Shield Vertical, Inc.  
Kenneth Corben, Owner  
1443 Anaheim St.  
Long Beach, CA 90813  
Certified Mail No. 7022 1670 0001 3411 3691  
Ken@pacificshielddistribution.com

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

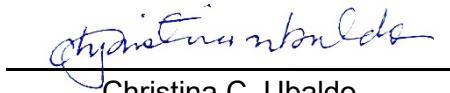
Kenneth Corben  
1445 W Anaheim St.  
Long Beach, CA 90813  
Certified Mail No. 7022 1670 0001 3411 3707  
Ken.d3d@gmail.com

Harinder K. Kapur (email only)  
Senior Assistant Attorney General  
Cannabis Control Section  
Office of the Attorney General  
Harinder.Kapur@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 September 11, 2025, at Rancho Cordova, California.

  
Christina C. Ubaldo