



**Department of
Cannabis Control**
CALIFORNIA

Gavin Newsom

Governor

Nicole Elliott

Director

December 29, 2025

VIA EMAIL ONLY

Shield Management Group, LLC
dba West Coast Cure
Douglas Francis, Owner
Jerett Wasserman, Owner
Logan Wasserman, Owner
logan@wcc.com

Craig S. Wasserman, Esq.
legal@wcc.com

Re: Shield Management Group, LLC dba West Coast Cure
Case Nos. DCC24-0000261-INV & DCCC24-0000262-INV
OAH Case Nos. 2025020647 & 2025020650
Order Adopting Stipulated Settlement as Final Decision

Dear Messrs. Francis and Wasserman:

Pursuant to section 11415.60 of the Government Code, attached please find a copy of the Department of Cannabis Control's Order Adopting Stipulated Settlement as the Final Decision in the above-referenced matter involving Shield Management Group, LLC dba West Coast Cure.

The Department's Order and Final Decision will be effective today, December 29, 2025. Pursuant to this Final Decision and its stipulated settlement, Shield Management Group, LLC has waived any right to reconsideration or appeal in this matter and to receive a copy of the Order and Final Decision via certified, registered, or first-class mail.

Sincerely,

Marc LeForestier
General Counsel

Enclosure

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

11 In the Matter of the Appeals of the Citations) Consolidated Case Nos.
12 Against:) DCC24-0000261-INV and
13 **SHIELD MANAGEMENT GROUP, LLC**) DCC24-0000262-INV
14 **DBA WEST COAST CURE**) OAH Nos. 2025020647 and 2025020650
15 2210 W Gaylord St.)
16 Long Beach, CA 90813)
17 Cannabis Distribution License) **ORDER ADOPTING STIPULATED**
18 No. C11-0000171-LIC;) **SETTLEMENT AS FINAL DECISION**
Cannabis Manufacturer-Type 7 License)
No. DCC-10003818)
19 Respondent.)

20 Pursuant to Government Code section 11415.60, the Department of Cannabis Control
21 hereby adopts the attached Stipulated Settlement as its Final Decision in this matter.

22 This Order and Final Decision shall become effective on December 29, 2025.

23 IT IS SO ORDERED, December 29, 2025.



Marc LeForestier
General Counsel
FOR THE DEPARTMENT OF CANNABIS CONTROL

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

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

18 In the Matter of the Appeals of the Citations
19 Against:

20 Consolidated Case Nos.
21 DCC24-0000261-INV and
22 DCC24-0000262-INV

23 **SHIELD MANAGEMENT GROUP, LLC**
24 **DBA WEST COAST CURE;**
25 **2210 W GAYLORD ST.,**
26 **LONG BEACH, CA 90813**

27 OAH Nos. 2025020647 and 2025020650

28 **Cannabis - Distributor License**
29 **No. C11-0000171-LIC;**
30 **Cannabis - Manufacturer - Type 7 License**
31 **No. DCC-10003818**

32 **STIPULATED SETTLEMENT OF**
33 **CITATIONS AND ORDER**

34 Respondent.

35
36 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
37 entitled proceedings that the following matters are true:

38 **PARTIES**

39 1. Evelyn Schaeffer (Complainant), Deputy Director of the Compliance Division of
40 the Department of Cannabis Control (Department), brought this action solely in her official
41 capacity and is represented in this matter by Rob Bonta, Attorney General of the State of
42 California, by Matthew S. Beasley, Deputy Attorney General.

1 2. Respondent Shield Management Group, LLC dba West Coast Cure (Respondent)
2 is represented in this proceeding by attorney Craig S. Wasserman, whose address is: 12362 Beach
3 Blvd., Ste. 15, Stanton, CA 90680-3955. Respondent is acting in this proceeding through Logan
4 Wasserman who has been designated and authorized by Respondent to enter into this Stipulated
5 Settlement of Citations and Order (Order) on behalf of the Respondent (hereafter “Authorized
6 Representative”).

7 3. On or about May 24, 2019, the Department issued Cannabis - Distributor License
8 No. C11-0000171-LIC to Respondent. The Cannabis - Distributor License was in full force and
9 effect at all times relevant to the charges brought in this matter, and will expire on May 23, 2026,
10 unless renewed.

11 4. On or about August 20, 2019, the Department issued Cannabis - Manufacturer -
12 Type 7 License No. DCC-10003818 to Respondent. The Cannabis - Manufacturer - Type 7
13 License was in full force and effect at all times relevant to the charges brought in this matter, and
14 will expire on August 20, 2026, unless renewed.

JURISDICTION

16 5. Citation Nos. DCC24-0000261-INV and DCC24-0000262-INV (“Citations”) were
17 filed before the Department, were subsequently amended, and are currently pending against
18 Respondent. The amended Citations and all other statutorily required documents were properly
19 served on Respondent on December 27, 2024. Respondent timely filed its requests for formal
20 hearing contesting the Citations.

21 6. A true and correct copy of Citation No. DCC24-0000261-INV is attached as
22 exhibit A and incorporated herein by reference. A true and correct copy of Citation
23 No. DCC24-0000262-INV is attached as exhibit B and incorporated herein by reference.

24 7. Respondent through its Authorized Representative has carefully read, fully
25 discussed with counsel, and understand the charges and allegations in Citation Nos. DCC24-
26 0000261-INV, and DCC24-0000262-INV. Respondent through its Authorized Representative
27 has also carefully read, fully discussed with counsel, and understand the effects of this Stipulated
28 Settlement of Citations and Order.

ADVISEMENT AND WAIVERS

2 8. Respondent through its Authorized Representative is fully aware of its legal rights
3 in this matter, including the right to a hearing on the charges and allegations in the Citations; the
4 right to confront and cross-examine the witnesses against it; the right to present evidence and to
5 testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of
6 witnesses and the production of documents; the right to reconsideration and court review of an
7 adverse decision; and all other rights accorded by the California Administrative Procedure Act
8 and other applicable laws.

9 9. Respondent through its Authorized Representative is fully aware of its legal rights
10 to receive a copy of the Decision and Order via certified, registered, or first-class mail.
11 Respondent agrees to receive a copy of the Decision and Order in this matter via email at the
12 following email address(es): logan@wcc.com and legal@wcc.com.

13 10. Respondent through its Authorized Representative voluntarily, knowingly, and
14 intelligently waive and give up each and every right set forth above.

CULPABILITY

16 11. Respondent agrees that Cannabis - Distributor License No. C11-0000171-LIC and
17 Cannabis - Manufacturer - Type 7 License No. DCC-10003818 are subject to fines and agrees to
18 be bound by the Department's imposition of an administrative fine and probationary terms as set
19 forth in this Order below.

CONTINGENCY

21 12. This stipulation shall be subject to approval by the Department. Respondent
22 understands and agrees that counsel for Complainant and the staff of the Department may
23 communicate directly with the Department regarding this stipulation and settlement, without
24 notice to or participation by Respondent, Authorized Representative, or its counsel. By signing
25 the stipulation, Respondent understands and agrees that it may not withdraw their agreement or
26 seek to rescind the stipulation prior to the time the Department considers and acts upon it. If the
27 Department fails to adopt this stipulation as its Decision and Order, this Order shall be of no force
28 or effect, except for this paragraph, it shall be inadmissible in any legal action between the

1 parties, and the Department shall not be disqualified from further action by having considered this
2 matter.

3 **OTHER MATTERS**

4 13. The parties understand and agree that Portable Document Format (PDF) and
5 facsimile copies of this Stipulated Settlement of Citations and Order, including PDF and facsimile
6 signatures thereto, shall have the same force and effect as the originals.

7 14. This Stipulated Settlement of Citations and Order may be signed in any number of
8 counterparts, each of which is an original and all of which taken together form one single
9 document.

10 15. This Stipulated Settlement of Citations and Order is intended by the parties to be
11 an integrated writing representing the complete, final, and exclusive embodiment of their
12 agreement. It supersedes any and all prior or contemporaneous agreements, understandings,
13 discussions, negotiations, and commitments (written or oral). This Stipulated Settlement of
14 Citations and Order may not be altered, amended, modified, supplemented, or otherwise changed
15 except by a writing executed by an authorized representative of each of the parties.

16 16. In consideration of the foregoing admissions and stipulations, the parties agree that
17 the Department may, without further notice or formal proceeding, issue and enter the following
18 Order:

19 **ORDER**

20 1. **WITHDRAWAL OF APPEALS.** Respondent's appeals of Citation Nos.
21 DCC24-0000261-INV and DCC24-0000262-INV, and requests for administrative hearings, are
22 deemed withdrawn and any further appeals are waived.

23 2. **PAYMENT OF FINE.** Respondent shall pay to the Department an administrative
24 fine in the amount of sixty-two thousand five hundred dollars (\$62,500). The fine payment shall
25 be made in twelve monthly payments of five thousand two hundred and eight dollars and thirty-
26 three cents (\$5,208.33), with first payment due January 15, 2026, and each subsequent payment
27 due on the fifteenth day of each month thereafter.

1 3. **PAYMENT OF COST OF ENFORCEMENT.** Respondent shall pay to the
2 Department costs associated with its investigation and enforcement pursuant to Business and
3 Professions Code section 26031 and California Code of Regulations, title 4, section 17813, in the
4 amount of twenty-one thousand eight hundred and five dollars (\$21,805). The cost payment shall
5 be made in twelve monthly payments of one thousand eight hundred and seventeen dollars and
6 eight cents (\$1,817.08), with first payment due January 15, 2026, and each subsequent payment
7 due on the fifteenth day of each month thereafter.

8 4. The above-referenced payments shall be in the form of cashier's check, money
9 order, personal or business check, and shall be remitted by either of the following methods: (1)
10 the Department of Cannabis Control's cash payment procedures; or, (2) mailed to:

By U.S. Postal Service:
Department of Cannabis Control
Attn: Cashiers
P.O. Box 419106
Ranch Cordova, CA 95741-9106

By FedEx or UPS:
Department of Cannabis Control
Attn: Cashiers
2920 Kilgore Road
Rancho Cordova, CA 95670-9106

18 5. Failure to complete the payments or comply with the above terms of this Order
19 shall constitute a violation pursuant to Business and Professions Code section 26031.5,
20 subdivision (f) and California Code of Regulations, title 4, section 17804, subdivision (c), and
21 subject the Respondent to further administrative action by the Department, including suspension
22 or non-renewal of Respondent's Cannabis - Distributor License No. C11-0000171-LIC, and of
23 Respondent's Cannabis - Manufacturer - Type 7 License No. DCC-10003818, as well as denial of
24 any other license sought.

25 6. Failure to complete the payments or comply with the terms of this Order shall also
26 result in Respondent's immediate obligation and responsibility to pay the full amount of the
27 Department's costs of investigation and enforcement pursuant to Business and Professions Code
28 section 26031 and California Code of Regulations, title 4, section 17813, in the amount of

1 \$43,610, less any partial payments received prior to the failure to complete payments or comply
2 with the terms of this Order and will result in enforcement of the Order in the Superior Court.

3 7. **DECISION BY SETTLEMENT.** This Stipulated Settlement of Citation and
4 Order is a decision by settlement per Government Code section 11415.60.

5 8. **PROBATION TERMS AND CONDITIONS.** Respondent through its
6 Authorized Representative agrees to a one-year probation, as to each of the Cannabis - Distributor
7 License and the Cannabis - Manufacturer – Type 7 License from the effective date of the
8 Decision and Order (the Probation Period) based on the following terms and conditions:

9 A. Within 30 days of the effective date of the Decision and Order, Respondent through
10 its Authorized Representative shall designate one or more persons knowledgeable about the
11 Medicinal Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) and its implementing
12 regulations (California Code of Regulations, title 4, sections 15000 et seq.) to act as the
13 Commercial Cannabis Compliance Coordinator (Compliance Coordinator) during the Probation
14 Period.

15 i. Respondent shall promptly provide the Compliance Coordinator copies of all legal
16 action and written violation advisements, including but not limited to any Notice of
17 Noncompliance, citation, discipline, civil or criminal enforcement action by the
18 Department or any other agency during the Probation Period.

19 ii. The Compliance Coordinator shall manage Respondent's compliance with all
20 applicable laws relating to commercial cannabis activity in California, including but
21 not limited to the MAUCRSA, its implementing regulations, and all applicable local
22 ordinances.

23 iii. The Compliance Coordinator shall maintain a Compliance Program for Respondent's
24 commercial cannabis activities which includes (1) collecting and maintaining copies
25 of all legal action and written violation advisements; (2) assessing Respondent's
26 compliance with applicable laws and regulations relating to commercial cannabis
27 activity; (3) advising Respondent's personnel on compliance with applicable laws and
28

1 regulations relating to commercial cannabis activity in California; and (4) working
2 with Respondent to ensure it corrects any noted deficiencies or violations.

3 B. Any cannabis or cannabis product for which Respondent has received notice of a
4 sampling or reconciliation violation from the Department shall be destroyed and evidence of its
5 destruction submitted to the Department within 15 days. For purposes of this paragraph, a
6 sampling or reconciliation violation is limited to:

- 7 i. Any cannabis or cannabis product in Respondent's possession that has failed
8 regulatory compliance testing; or
- 9 ii. Any cannabis or cannabis product in Respondent's possession that has been
10 submitted for regulatory compliance testing but for which no video surveillance
11 footage of the sample collection exists.

12 C. Within 30 days from the effective date of the Decision and Order, Respondent shall
13 submit notice to the Department the identity and contact information for its Compliance
14 Coordinator.

15 D. Respondent's Compliance Coordinator shall submit to the Department each quarter,
16 beginning four months from the effective date of the settlement and for the remainder of the
17 Probation Period, a status report for each licensed premises of Respondent describing:

- 18 i. Implementation of the Compliance Program and its findings and results, including,
19 but not limited to, violations, risks, recommendations, and corrective measures
20 adopted relating to product safety, quality controls, video surveillance, reporting, and
21 record keeping, and how it is satisfying the terms of this settlement;
- 22 ii. Any material changes made to the Compliance Program in the preceding quarter;
- 23 iii. Any legal action or written violation advisement and any action taken in response
24 thereto; and
- 25 iv. Any sanction, penalty, or fine imposed or paid by Respondent as a result of any legal
26 action or written violation advisement.

v. A description of corrective action(s) taken by Respondent to address any violation, deficiency, or risk identified by the Compliance Coordinator, and the timeframe in which it was achieved.

4 E. At least once per month, starting 30 days from the effective date of the settlement and
5 during the remainder of the Probation Period, the Compliance Coordinator shall submit to the
6 Department video surveillance footage of all cannabis and cannabis product samples collected
7 from the licensed premises for regulatory compliance testing.

8 F. The Compliance Coordinator must sign each quarterly report under penalty of perjury
9 under the laws of the State of California, and include the following for the reported quarter:

10 i. A statement certifying that video surveillance footage for all months of the reported
11 quarter have been submitted to the Department in accordance with the settlement; and
12 ii. Record of all adjustments made for each monthly reconciliation required by the
13 MAUCRSA and implementing regulations.

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ACCEPTANCE

2 I have carefully read the above Stipulated Settlement of Citations and Order and have fully
3 discussed it with my attorney, Craig S. Wasserman. I understand the stipulation and the effect it
4 will have on my Cannabis - Distributor License and my Cannabis - Manufacturer - Type 7
5 License. I enter into this Stipulated Settlement of Citations and Order voluntarily, knowingly, and
6 intelligently, and agree to be bound by the Decision and Order of the Department of Cannabis
7 Control

9 DATED: December 15, 2025

SHIELD MANAGEMENT GROUP, LLC
By: LOGAN WASSERMAN,
OWNER AND AUTHORIZED REPRESENTATIVE
Respondent

3 I have read and fully discussed with Logan Wasserman, Owner and Authorized
4 Representative of Shield Management Group LLC, the terms and conditions and other matters
5 contained in the above Stipulated Settlement of Citations and Order. I approve its form and
6 content. 

DATED: 12-15-25

CRAIG S. WASSERMAN
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement of Citations and Order is hereby respectfully submitted for consideration by the Department of Cannabis Control.

DATED: 12/15/25

Respectfully submitted,

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

Matthew S. Beasley

MATTHEW S. BEASLEY
Deputy Attorney General
Attorneys for Complainant

SD2024802300
CCS Stipulated Settlement and Disciplinary Order.docx

Exhibit A

Citation No. DCC24-0000261-INV



AMENDED CITATION, FINE and ORDER OF ABATEMENT

Business and Professions Code, § 26031.5

California Code of Regulations, Title 4, §§ 17802-17804

Case Number: DCC24-0000261-INV

Date Issued	December 27, 2024
Issued To	Shield Management Group, LLC, DBA – West Coast Cure
Address of Service	Logan Wasserman, Owner Applicant/Business Owner, on behalf of Shield Management Group, LLC at 5708 OLD VILLAGE RD, YORBA LINDA, Ca, 92887 Doug Francis, Business Owner, on behalf of Shield Management Group, LLC at 49 Discovery Suite 200, Irvine, CA 92603
Method of Service	Certified Mail
License Number	CDPH-10003818

Business and Professions Code section 26031.5 provides the Department of Cannabis Control (Department) the authority to issue a citation, including fines and orders of abatement, to a licensee or unlicensed person for any act or omission that violates or has violated any provision of the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) or any regulation adopted pursuant thereto. You are being issued this citation for the following violations of MAUCRSA (Bus. & Prof. Code (BPC) § 26000 et seq.), and the Department's regulations (Cal. Code Regs. (CCR), tit. 4, § 15000 et seq.).

VIOLATION	VIOLATION DATE(S)	AMOUNT OF FINE PER DAY	TOTAL AMOUNT OF FINE FOR VIOLATION
1. California Code of Regulations, title 4, section §15044, subdivision (h), pursuant to subdivision (l)	November 21, 2023, to December 8, 2023 (17 days)	\$2,500	\$42,500

2. California Code of Regulations, title 4, section §15044, subdivision (d), subsection (1)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
3. California Code of Regulations, title 4, section §15044, subdivision (d), subsection (1), pursuant to subdivision (l)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
4. California Code of Regulations, title 4, section §15027, subdivision (a)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
			Total: \$1,422,500

Violation 1. Failure to Keep Video Surveillance Records for 90 Days (Shield's Manufacturing License Subject to Discipline for Shield's Distribution License's Violation)

CCR, title 4, section 15044, subdivision (d)(1) states that areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises shall be recorded on the video surveillance system. Pursuant to CCR, title 4, section 15044, subdivision (l), if multiple licensed premises are contained within the same building or on the same parcel of land, a single video surveillance system covering the entire building or parcel of land may be used by all of the licensees if all licensees have immediate access to the surveillance records to produce them pursuant to subsection (i). **Subdivision (l) also states that all licensees sharing a video surveillance system shall be held responsible and subject to discipline for any violations of the video surveillance requirements.**

Shield's distribution licensed (C11-0000171-LIC) premises and Shield's manufacturing licensed (CDPH-10003818) premises share the same building and parcel of land located at 2210 W Gaylord St, Long Beach, CA, 90813. Shield's distribution license and manufacturing license share the same video surveillance system which covers areas both inside and outside their building. Video



surveillance system records are accessible from a room on the premises labeled “Shared Surveillance Monitoring & Surveillance System Storage” on Shield’s premises diagram. This room is accessible from a hallway shared by Shield’s distribution license and manufacturing license. This hallway is designated as a “Shared Hallway” on Sheild’s premises diagram.

On February 21, 2024, Department staff conducted an inspection at Shield Management Group, LLC’s (Shield) distribution licensed premises. During this inspection, Department staff requested to check the video surveillance records and storage on the distribution license premises. Department staff met with Shield’s security manager, John Richardson (Richardson) in the “Shared Surveillance Monitoring & Surveillance System Storage” room, as designated on Shield’s premises diagram. When Department staff requested to see ninety (90) days’ worth of video surveillance and retention (90 days prior being November 21, 2023), Richardson was only able to show video surveillance recordings dating back to December 8, 2023, which is only seventy-three (73) days’ worth of video surveillance retention.

Shield’s distribution license failed to comply with the Department’s regulations and violated CCR, title 4, section 15044, subdivision (h) by failing to keep video surveillance recordings for a minimum of 90 calendar days. **Shield’s manufacturing license is subject to discipline based on Shield’s distribution license’s violation, pursuant to CCR, title 4, section 15044, subdivision (l).**

Violation 2. Failure to Record Cannabis Storage Areas on Video Surveillance System (Shield Manufacturing License Violation)

CCR, title 4, section 15044, subdivision (d)(1) states that areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises shall be recorded on the video surveillance system.

On February 21, 2024, Department staff conducted a regulatory compliance inspection at Shield’s manufacturing licensed premises. Manufacturing manager Robert Rodgers (Rodgers) showed Department staff a set of five (5) Conex boxes. Three (3) of the Conex boxes were yellow in color, two (2) were white, they sat side by side on the back/east side of the manufacturing facility parking lot. Rodgers stated the Conex boxes were used for cannabis product storage and utilized by both the distribution and manufacturing licenses. Rodgers was asked by Department staff to clarify which Conex boxes were used by Shield’s manufacturing, as there were several on the license’s address. Rodgers explained that the five (5) Conex boxes on the east/back side of the address parking lot were specifically used for storage of fresh frozen cannabis and packaged cannabis and cannabis products for Shield’s manufacturing license. The Conex boxes were not listed on the Licensee’s



premises diagram provided to the Department. Additionally, Department staff interviewed Product Operations Manager Jamie Prock (Prock), who stated that the video surveillance system in the Conex boxes had been non-operational for approximately eight (8) months. During the period of nonoperation Shield did not attempt to fix their video surveillance system inside the Conex containers being used for inventory storage.

On February 21, 2024, Department staff observed that C1D1 booth, a storage room used for storing bulk flower for the manufacturing license, was missing a camera. During a prior walkthrough of the C1D1 booth, Department staff had observed that C1D1 booth had been storing bulk cannabis flower.

Shield's manufacturing license failed to comply with the Department's regulations and violated CCR, title 4, section 15044, subdivision (d)(1) by failing to record cannabis storage areas on its video surveillance system.

Violation 3. Failure to Record Cannabis Storage Areas on Video Surveillance System (Shield's Manufacturing License Subject to Discipline for Shield's Distribution License's Violation)

CCR, title 4, section 15044, subdivision (d)(1) states that areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises shall be recorded on the video surveillance system. Pursuant to CCR, title 4, section 15044, subdivision (l), if multiple licensed premises are contained within the same building or on the same parcel of land, a single video surveillance system covering the entire building or parcel of land may be used by all of the licensees if all licensees have immediate access to the surveillance records to produce them pursuant to subsection (i). **Subdivision (l) also states that all licensees sharing a video surveillance system shall be held responsible and subject to discipline for any violations of the video surveillance requirements.**

Shield's distribution licensed premises and Shield's manufacturing licensed premises share the same building and parcel of land located at 2210 W Gaylord St, Long Beach, CA, 90813. Shield's distribution license and manufacturing license share the same video surveillance system which covers areas both inside and outside their building. Video surveillance system records are accessible from a room on the premises labeled "Shared Surveillance Monitoring & Surveillance System Storage" on Shield's premises diagram. This room is accessible from a hallway shared by Shield's distribution license and manufacturing license. This hallway is designated as a "Shared Hallway" on Sheild's premises diagram.



On February 21, 2024, Department staff conducted an inspection at Shield's distribution licensed premises and met with Shield's Fulfillment Supervisor, Gui Coelho (Coelho). Department staff asked Coelho to take them to the areas where they stored Shield's inventory for the distribution license. Coelho stated that most of their inventory was being held in Conex containers located in the parking lot. Coelho then led Department staff to the back/east parking lot where some of these Conex containers were located. Department staff saw five Conex containers in the back/east parking lot. None of the Conex containers in the back/east parking lot were shown on Shield's distribution premises diagram. Coelho opened the Conex containers and Department staff found that four of the containers contained cannabis and cannabis products for both their distribution and manufacturing licenses.

Department staff also saw that none of Shield distribution's Conex containers that held cannabis or cannabis products appeared to have functional video surveillance cameras; one of the containers had a video surveillance camera with unconnected wires and the other two containers did not have any cameras. When asked about the lack of functional surveillance cameras in these Conex containers Coelho stated that none of the cameras had been working since he began his employment with Shield approximately six (6) months ago.

Coelho then led Department staff to the front/west parking lot which had seven additional Conex containers and opened each of them. Department staff saw that three of these Conex containers were being utilized to store cannabis and cannabis products and the other Conex containers were being used as general supply storage. None of these Conex containers had any video surveillance cameras. During the inspection, Department staff spoke with employees of Shield to discuss how the distribution license video recorded testing sample collection for regulatory compliance testing. Manufacturing Manager, Robert Rodgers (Rodgers) stated that all sample collection took place in the Conex containers that stored cannabis in the back/east parking lot. Rodgers confirmed that these Conex containers lacked video surveillance and was aware and acknowledged that Shield could not properly capture the required testing sample collection video footage via surveillance cameras.

Department staff also spoke with Product Operations Manager, Jamie Prock (Prock) who confirmed that all testing sample collection for the distribution license was completed in the Conex containers. Prock acknowledged the lack of surveillance cameras in the Conex containers. Prock stated that Shield employees would sometimes record testing sample collection video via their cell phone, but Prock did not supply any footage to substantiate this claim.



Shield's distribution license failed to comply with the Department's regulations and violated CCR, title 4, section 15044, subdivision (d)(1) by failing to record areas that contained cannabis or cannabis products on the distribution premises. **Shield's manufacturing license is subject to discipline based on Shield's distribution license's violation, pursuant to CCR, title 4, section 15044, subdivision (l).**

Violation 4. Modification of the Premises Without Prior Written Approval (Shield Manufacturing License Violation)

CCR, title 4, section 15027, subdivision (a) provides that a licensee shall not, without prior written approval of the Department, make any physical change, alteration, or modification of the licensed premises that materially or substantially alters the licensed premises or the use of the licensed premises from the premises diagram originally filed with the licensee application. Additionally, a licensee whose licensed premises is materially or substantially changed, modified, or altered is responsible for filing a request for premises modification with the Department.

Per CCR, title 4, section 15027, subdivision (e), subsections (2) and (3) provides that a material or substantial change, alteration, or modification to a licensed distribution, retail or testing laboratory premises that require prior approval from the Department include, but are not limited to: (2) any physical change that would require the installation of additional video surveillance cameras or a change in the video surveillance system to meet the requirements of 15044, or alarm systems to meet the requirements of section 15047, and: (3) any physical change that would require a building permit, zoning change, or other approval from the applicable local jurisdiction.

On February 21, 2024, Department staff conducted an inspection at Shield's manufacturing license premises. During this inspection, Department staff discovered that Shield's manufacturing license was storing cannabis and cannabis products in Conex containers located in Shield's parking lots. (See facts in Violation 2 above.)

Department staff reviewed Shield manufacturing's uploaded and approved premises diagram and observed that none of these Conex containers were listed or identified as storage on the premises diagram.

Additionally, in a later interview, Department staff interviewed Rodgers and Prock, and both of them admitted to utilizing these Conex containers for cannabis and cannabis product storage. Furthermore, Rodgers stated that they have been utilizing these Conex containers for cannabis and



cannabis product storage for under one year, as Rodgers stated they have local authority approval until December 2024. However, Department staff later verified with the City of Long Beach's Business Licensing Supervisor/Cannabis Inspector Lori Voss (Voss), that Shield "has not received a modification of premises application ... to allow for storage containers." Voss goes on to further state "if they [Shield] were to have storage containers on this property, that are being used to store cannabis in, they would be in violation."

On February 28, 2024, Shield attempted to update their premises diagram with the Department's licensing division. Mat Dillion (Dillion) emailed an updated premises diagram to licensingchange@cannabis.ca.gov on this date in an attempt to have the Conex containers added onto their premises diagram for storage purposes. However, on March 11, 2024, Shield's request for a premises modification was denied due to "local jurisdiction verification received for the premises Not in Compliant.

Shield's manufacturing license failed to comply with the Department's regulations and violated CCR, title 4, section 15027, subdivision (a) by modifying its premises without the Department's prior written approval.

ADMINISTRATIVE FINE ASSESSED

Pursuant to Business and Professions Code section 26031.5, the Department may assess a fine not to exceed five thousand dollars (\$5,000) per violation by a licensee or thirty thousand dollars (\$30,000) per violation by an unlicensed person. Each day of violation shall constitute a separate violation.

The full amount of the fine must be paid within thirty (30) days of the date of service of this citation, unless the citation is contested. To ensure the payment is credited, indicate on your payment the case number provided at the top of this citation. Payment shall be made by cashier's check, payable to the Department of Cannabis Control and submitted to:

U.S. Postal Service	FedEx or USPS
Department of Cannabis Control Compliance Division PO Box 419106 Rancho Cordova, CA 95741 Attention: Payments	Department of Cannabis Control Compliance Division 2920 Kilgore Road Rancho Cordova, CA 95670 Attention: Payments



Failure to pay the full amount of the administrative fine within thirty (30) days from the date of service of the citation, unless you appeal the citation, is a separate violation and may result in additional action by the Department. Licenses shall not be renewed or granted if fines are not paid and unpaid fines will be added to license renewal fees.

ORDER OF ABATEMENT

Pursuant to Business and Professions Code section 26031.5, a citation may include an order of abatement and fix a reasonable time for abatement of the violation. You are ordered to:

1. Immediately cease and desist from violating California Code of Regulations, title 4, section 15044, subdivision (d), subsection (1)
2. Immediately cease and desist from violating California Code of Regulations, title 4, section 15027, subdivision (a).

You must abate the violation and provide evidence of abatement to the Department within the time period specified in the order of abatement. Failure to abate the violation(s) within the time allowed, unless the violation is being appealed, shall constitute a separate violation and may result in denial of an application for licensure or renewal of a license, disciplinary action, or further administrative or civil proceedings. If you are unable to complete the correction within the time provided because of conditions beyond your control after the exercise of reasonable diligence, you may request an extension of time in which to correct the violation. The request shall be made in writing and submitted to the Department, at Jeffrey.Routsong@cannabis.ca.gov within the time set forth for abatement. The time to abate or correct may be extended for good cause.

APPEALING THE CITATION

To appeal the citation, you may request an informal conference with the Department, or request a formal hearing to contest the citation before an Administrative Law Judge, or both. Requests must be submitted in writing in accordance with the timeframes specified below or the right to a hearing is waived. If a hearing is not requested, payment of a fine will not constitute an admission of the violation charged.

INFORMAL CONFERENCE

You may request an informal conference with the Department regarding the acts or omissions found in the citation in accordance with CCR, title 4, section 17803. During an informal conference, you



may present evidence supporting an adjustment to the citation and/or fine(s). The Department may affirm, modify, or dismiss the citation, including any fines assessed or orders of abatement issued. The informal conference may also resolve any matters relating to the citation through a settlement agreement.

To request an informal conference, your request must be in writing and submitted to the Department at Jeffrey.Routsong@cannabis.ca.gov, within 15 calendar days from service of this citation. The informal conference may be conducted by telephone, through a virtual platform, or in person, at the Department's Headquarters, located at 2920 Kilgore Road, Rancho Cordova, California 95670. The informal conference will be held within 15 calendar days from receipt of the written request by the Department.

Requesting an informal conference does not stay or toll the running of the 30-day period for you to request a formal hearing to contest the citation before an Administrative Law Judge. You should request an informal conference as soon as possible if you would like to allow time to hold the conference prior to the deadline for contesting the citation as the time to contest a citation does not stop if you request an informal conference.

At the conclusion of the informal conference, a written decision stating the reasons for the decision will be mailed to you within 15 calendar days from the date of the informal conference, which shall be deemed a final order. If the citation is dismissed, any request for a formal hearing shall be deemed withdrawn. If the citation is affirmed or modified, you may either withdraw the request for a formal hearing or proceed with the hearing. If the citation is modified, the original citation shall be considered withdrawn and a new citation issued. A request for a formal hearing on the new citation must be submitted to the Department in writing within 30 calendar days of issuance of the new citation.

CONTESTING THE CITATION

You have a right to contest the finding of a violation before an Administrative Law Judge by requesting a formal hearing. To request a formal hearing, your request must be in writing and submitted to the Department within 30 calendar days from service of the citation. If a request is not received by the Department within 30 calendar days, the right to a hearing is waived, and the citation becomes final and not subject to review by any court. The hearing shall be held pursuant to the Administrative Procedure Act (Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code). Written requests for a hearing to contest the finding of a violation must be emailed to appeals@cannabis.ca.gov or submitted in hard copy by mail or delivery to:



Issued To: Shield Management Group, LLC
License/Case No: CDPH-10003818/DCC24-0000261-INV
Issued By: Evelyn Schaeffer
Date: December 27, 2024
Page 10 of 10

U.S. Postal Service	FedEx or USPS
Department of Cannabis Control Legal Affairs Division PO Box 419106 Rancho Cordova, CA 95741	Department of Cannabis Control Legal Affairs Division 2920 Kilgore Road Rancho Cordova, CA 95670

The Department may seek recovery of the reasonable costs of investigation and enforcement pursuant to Business and Profession Code section 26031.1 at the formal hearing on the citation.

If you have any questions regarding this citation or the appeals process, please contact Jeffrey Routsong at Jeffrey.Routsong@cannabis.ca.gov or (831) 206-2661.

Date: December 27, 2024

Evelyn Schaeffer
Deputy Director
Compliance Division
Department of Cannabis Control

By:

Evelyn Schaeffer

Evelyn Schaeffer
Deputy Director
Compliance Division
Department of Cannabis Control



Department of
Cannabis Control
CALIFORNIA

Citation
Form DCC-8107 | Revision Date: 07.19.2022

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

Case Name: **In the Matter of the Appeal of Citation Issued Against Shield Management Group, LLC dba West Coast Cure**

Case No.: **DCC24-0000261-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. 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 December 30, 2024, I served the attached **AMENDED CITATION, FINE AND ORDER OF ABATEMENT** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **AMENDED CITATION, FINE AND ORDER OF ABATEMENT** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, addressed as follows:

Logan Wasserman
Shield Management Group, LLC
12362 Beach Blvd., Suite 15
Stanton, CA, 90680
Respondent

Logan Wasserman
Shield Management Group, LLC
43 Discovery, Suite 200
Irvine, CA 92603
Respondent

Certified Article Number

9414 7266 9904 2226 4386 48

SENDER'S RECORD

Certified Article Number

9414 7266 9904 2226 4386 31

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 December 30, 2024, at Los Angeles, California.

Michelle Sandoval
Declarant

Michelle Sandoval
Signature

Exhibit B

Citation No. DCC24-0000262-INV



AMENDED CITATION, FINE and ORDER OF ABATEMENT

Business and Professions Code, § 26031.5

California Code of Regulations, Title 4, §§ 17802-17804

Case Number: DCC24-0000262-INV

Date Issued	December 27, 2024
Issued To	Shield Management Group, LLC, DBA - West Coast Cure
Address of Service	Logan Wasserman, Owner Applicant/Business Owner, on behalf of Shield Management Group, LLC at 12362 Beach Blvd. Suite 15, Stanton, Ca, 90680 Logan Wasserman, Owner Applicant/Business Owner, on behalf of Shield Management Group, LLC at 43 Discovery, Suite 200, Irvine, CA 92603
Method of Service	Certified Mail
License Number	C11-0000171-LIC

Business and Professions Code section 26031.5 provides the Department of Cannabis Control (Department) the authority to issue a citation, including fines and orders of abatement, to a licensee or unlicensed person for any act or omission that violates or has violated any provision of the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) or any regulation adopted pursuant thereto. You are being issued this citation for the following violations of MAUCRSA (Bus. & Prof. Code (BPC) § 26000 et seq.), and the Department's regulations (Cal. Code Regs. (CCR), tit. 4, § 15000 et seq.).

VIOLATION	VIOLATION DATE(S)	AMOUNT OF FINE PER DAY	TOTAL AMOUNT OF FINE FOR VIOLATION
1. California Code of Regulations, title 4, section §15044, subdivision (h)	November 21, 2023, to December 8, 2023 (17 days)	\$2,500	\$42,500

2. California Code of Regulations, title 4, section §15044, subdivision (d), subsection (1)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
3. California Code of Regulations, title 4, section §15044, subdivision (d), subsection (1), pursuant to subdivision (l)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
4. California Code of Regulations, title 4, section §15027, subdivision (a)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
5. California Code of Regulations, title 4, section §15305, subdivision (c)	August 21, 2023, to February 21, 2024 (184 days)	\$2,500	\$460,000
		Total: \$1,882,500	

Violation 1. Failure to Keep Video Surveillance Records for 90 Days (Shield Distribution License Violation)

CCR, title 4, section 15044, subdivision (h) states that a licensee shall keep surveillance recordings for a minimum of 90 calendar days.

On February 21, 2024, Department staff conducted an inspection at Shield Management Group, LLC's (Shield) distribution licensed (C11-0000171-LIC) premises. During this inspection, Department staff requested to check the video surveillance records and storage on the licensed premises. Department staff met with Shield's security manager, John Richardson (Richardson) in the "Shared Surveillance Monitoring & Surveillance System Storage" room, as designated on Shield's premises diagram. When Department staff requested to see ninety (90) days' worth of video surveillance and retention (90



days prior being November 21, 2023), Richardson was only able to show video surveillance recordings dating back to December 8, 2023, which is only seventy-three (73) days' worth of video surveillance retention.

Shield's distribution license failed to comply with the Department's regulations and violated CCR, title 4, section 15044, subdivision (h) by failing to keep video surveillance recordings for a minimum of 90 calendar days.

Violation 2. Failure to Record Cannabis Storage Areas on Video Surveillance System (Shield Distribution License Violation)

CCR, title 4, section 15044, subdivision (d)(1) states that areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises shall be recorded on the video surveillance system.

On February 21, 2024, Department staff conducted an inspection at Shield's distribution licensed premises and met with Shield's Fulfillment Supervisor, Gui Coelho (Coelho). Department staff asked Coelho to take them to the areas where they stored Shield's inventory for the distribution license. Coelho stated that most of their inventory was being held in Conex containers located in the parking lot. Coelho then led Department staff to the back/east parking lot where some of these Conex containers were located. Department staff saw five Conex containers in the back/east parking lot. None of the Conex containers in the back/east parking lot were shown on Shield's distribution premises diagram. Coelho opened the Conex containers and Department staff found that four of the containers contained cannabis and cannabis products for both their distribution and manufacturing licenses.

Department staff also saw that none of the Conex containers that held cannabis or cannabis products appeared to have functional video surveillance cameras; one of the containers had a video surveillance camera with unconnected wires and the other three containers did not have any cameras. When asked about the lack of functional surveillance cameras in these Conex containers Coelho stated that none of the cameras had been working since, he began his employment with Shield approximately six (6) months ago.

Coelho then led Department staff to the front/west parking lot which had seven additional Conex containers and opened each of them. Department staff saw that three of these Conex containers were being utilized to store cannabis and cannabis products and the other Conex containers were



being used as general supply storage. None of these Conex containers had any video surveillance cameras. During the inspection, Department staff spoke with employees of Shield to discuss how the distribution license video recorded testing sample collection for regulatory compliance testing.

Manufacturing Manager, Robert Rodgers (Rodgers) stated that all sample collection took place in the Conex containers that stored cannabis in the back/east parking lot. Rodgers confirmed that these Conex containers lacked video surveillance and was aware and acknowledged that Shield could not properly capture the required testing sample collection video footage via surveillance cameras.

Department staff also spoke with Product Operations Manager, Jamie Prock (Prock) who confirmed that all testing sample collection for the distribution license was completed in the Conex containers. Prock acknowledged the lack of surveillance cameras in the Conex containers. Prock stated that Shield employees would sometimes record testing sample collection video via their cell phone, but Prock did not supply any footage to substantiate this claim.

Shield's distribution license failed to comply with the Department's regulations and violated CCR, title 4, section 15044, subdivision (d)(1) by failing to record cannabis storage areas on their video surveillance system.

Violation 3. Failure to Record Cannabis Storage Areas on Video Surveillance System (Shield's Distribution License Subject to Discipline for Shield Manufacturer License's Violation)

CCR, title 4, section 15044, subdivision (d)(1) states that areas where cannabis or cannabis products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises shall be recorded on the video surveillance system. Pursuant to CCR, title 4, section 15044, subdivision (l), if multiple licensed premises are contained within the same building or on the same parcel of land, a single video surveillance system covering the entire building or parcel of land may be used by all of the licensees if all licensees have immediate access to the surveillance records to produce them pursuant to subsection (i). **Subdivision (l) also states that all licensees sharing a video surveillance system shall be held responsible and subject to discipline for any violations of the video surveillance requirements.**

Shield's distribution licensed premises and Shield's manufacturing licensed (CDPH-10003818) premises share the same building and parcel of land located at 2210 W Gaylord St, Long Beach, CA, 90813. Shield's distribution license and manufacturing license share the same video



surveillance system which covers areas both inside and outside their building. Video surveillance system records are accessible from a room on the premises labeled “Shared Surveillance Monitoring & Surveillance System Storage” on Shield’s premises diagram. This room is accessible from a hallway shared by Shield’s distribution license and manufacturing license. This hallway is designated as a “Shared Hallway” on Sheild’s premises diagram.

On February 21, 2024, Department staff conducted a regulatory compliance inspection at Shield’s manufacturing license. Manufacturing Manager Robert Rodgers (Rodgers) showed Department staff a set of five (5) Conex boxes. Three (3) of the Conex boxes were yellow in color, two (2) were white, they sat side by side on the back/east side of the manufacturing facility parking lot. Rodgers stated the Conex boxes were used for cannabis product storage and utilized by both the distribution and manufacturing licenses. Rodgers was asked by Department staff to clarify which Conex boxes were used by Shield’s manufacturing, as there were several on the license’s address. Rodgers explained that the five (5) Conex boxes on the east/back side of the address parking lot were specifically used for storage of fresh frozen cannabis and packaged cannabis and cannabis products for Shield’s manufacturing license. The Conex boxes were not listed on the Licensee’s premises diagram provided to the Department. Additionally, Department staff interviewed Product Operations Manager, Jamie Prock (Prock), who stated that the video surveillance system in the Conex boxes had been non-operational for approximately eight (8) months. During the period of nonoperation Shield did not attempt to fix their video surveillance system inside the Conex containers being used for inventory storage.

On February 21, 2024, Department staff observed that C1D1 booth, a storage room used for storing bulk flower for the manufacturing license, was missing a camera. During a prior walkthrough of the C1D1 booth, Department staff had observed that C1D1 booth had been storing bulk cannabis flower.

Shield’s manufacturing license failed to comply with the Department’s regulations and violated CCR, title 4, section 15044, subdivision (d)(1) by failing to record area that contained cannabis or cannabis productions on the manufacturing premises. **Shield’s distribution license is subject to discipline based on Shield’s manufacturing license’s violation pursuant to CCR, title 4, section 15044, subdivision (l).**

Violation 4. Modification of the Premises Without Prior Written Approval (Shield Distribution License Violation)



CCR, title 4, section 15027, subdivision (a) provides that a licensee shall not, without prior written approval of the Department, make any physical change, alteration, or modification of the licensed premises that materially or substantially alters the licensed premises or the use of the licensed premises from the premises diagram originally filed with the licensee application. Additionally, a licensee whose licensed premises is materially or substantially changed, modified, or altered is responsible for filing a request for premises modification with the Department.

Per CCR, title 4, section 15027, subdivision (e)(2) and (3) provides that a material or substantial change, alteration, or modification to a licensed distribution, retail or testing laboratory premises that require prior approval from the Department include, but are not limited to: (2) any physical change that would require the installation of additional video surveillance cameras or a change in the video surveillance system to meet the requirements of 15044, or alarm systems to meet the requirements of section 15047, and: (3) any physical change that would require a building permit, zoning change, or other approval from the applicable local jurisdiction.

On February 21, 2024, Department staff conducted an inspection at Shield's distribution licensed premises. During this inspection, Department staff discovered that Shield was storing cannabis and cannabis products in Conex containers located in Shield's parking lots. (See facts in Violation 2 above.)

Department staff reviewed Shield's uploaded and approved premises diagram and observed that none of these Conex containers were listed or identified as storage on the premises diagram.

Additionally, in a later interview, Department staff interviewed Rodgers and Prock, and both of them admitted to utilizing these Conex containers for cannabis and cannabis product storage. Furthermore, Rodgers stated that they have been utilizing these Conex containers for cannabis and cannabis product storage for under one year, as Rodgers stated they have local authority approval until December 2024. However, Department staff later verified with the City of Long Beach's Business Licensing Supervisor/Cannabis Inspector Lori Voss (Voss), that Shield "has not received a modification of premises application ... to allow for storage containers." Voss goes on to further state "if they [Shield] were to have storage containers on this property, that are being used to store cannabis in, they would be in violation."

On February 28, 2024, Shield attempted to update their premises diagram with the Department's licensing division. Mat Dillion (Dillion) emailed an updated premises diagram to licensingchange@cannabis.ca.gov on this date in an attempt to have the Conex containers added



onto their premises diagram for storage purposes. However, on March 11, 2024, Shield's request for a premises modification was denied due to "local jurisdiction verification received for the premises Not in Compliant."

Shield's distribution license failed to comply with the Department's regulations and violated CCR, title 4, section 15027, subdivision (a) by modifying its premises without the Department's prior written approval.

Violation 5. Failure to Video Record Sampling of Cannabis or Cannabis Product for Regulatory Compliance Testing (Shield Distribution License Violation)

CCR, title 4, section 15305, subdivision (c) states that the sampling of cannabis or cannabis goods shall be videorecorded with the batch number stated verbally or in writing on the video at the beginning of that video, and a visible time and date indication on the video recording footage. Furthermore, video recordings shall be maintained for 90 calendar days by the licensed distributor.

On February 21, 2024, Department staff conducted an inspection at Shield's distribution license and met with Shield's Fulfillment Supervisor, Gui Coelho (Coelho). Department staff also spoke with Product Operations Manager, Jamie Prock (Prock), who confirmed that all testing sample collection for the distribution license was completed in the Conex containers that had no functional video surveillance cameras. Prock acknowledged the lack of surveillance cameras in the Conex containers. These Conex containers did not have operational video surveillance cameras for at least six months prior to the inspection. (See facts in Violation 2.) Prock stated that Shield employees would sometimes record testing sample collection video via their cell phone, but Prock did not supply any footage to substantiate this claim.

On February 23, 2024, Department staff sent an email to owner Logan Wasserman (Wasserman) requesting video surveillance footage for ten (10) recent manifests of cannabis being sent for regulatory compliance testing in order to review their sample collection procedures. On March 6, 2024, Wasserman supplied the requested video surveillance footage to Department staff as requested. On March 12, 2024, Department staff reviewed all uploaded video surveillance footage and observed zero (0) of them contained direct surveillance footage reflecting the batch number that was readable or stated verbally and observed none of them contained video surveillance footage of the testing laboratory staff/technician obtaining the representative sample for regulatory compliance testing. Additionally, as addressed in Violation 1, Shield is not maintaining video surveillance footage for the required 90 calendar days.



Shield's distribution license failed to comply with the Department's regulations and violated CCR, title 4, section 15305, subdivision (c) by failing to video record sampling of cannabis and cannabis product for regulatory compliance testing.

ADMINISTRATIVE FINE ASSESSED

Pursuant to Business and Professions Code section 26031.5, the Department may assess a fine not to exceed five thousand dollars (\$5,000) per violation by a licensee or thirty thousand dollars (\$30,000) per violation by an unlicensed person. Each day of violation shall constitute a separate violation.

The full amount of the fine must be paid within thirty (30) days of the date of service of this citation, unless the citation is contested. To ensure the payment is credited, indicate on your payment the case number provided at the top of this citation. Payment shall be made by cashier's check, payable to the Department of Cannabis Control and submitted to:

U.S. Postal Service	FedEx or USPS
Department of Cannabis Control Compliance Division PO Box 419106 Rancho Cordova, CA 95741 Attention: Payments	Department of Cannabis Control Compliance Division 2920 Kilgore Road Rancho Cordova, CA 95670 Attention: Payments

Failure to pay the full amount of the administrative fine within thirty (30) days from the date of service of the citation, unless you appeal the citation, is a separate violation and may result in additional action by the Department. Licenses shall not be renewed or granted if fines are not paid, and unpaid fines will be added to license renewal fees.

ORDER OF ABATEMENT

Pursuant to Business and Professions Code section 26031.5, a citation may include an order of abatement and fix a reasonable time for abatement of the violation. You are ordered to:

1. Immediately cease and desist from violating California Code of Regulations, title 4, section 15044, subdivision (h).
2. Immediately cease and desist from violating California Code of Regulations, title 4, section 15044, subdivision (d), subsection (1).



3. Immediately cease and desist from violating California Code of Regulations, title 4, section 15027, subdivision (a).
4. Immediately cease and desist from violating California Code of Regulations, title 4, section 15305, subdivision (c).

You must abate the violation and provide evidence of abatement to the Department within the time period specified in the order of abatement. Failure to abate the violation(s) within the time allowed, unless the violation is being appealed, shall constitute a separate violation and may result in denial of an application for licensure or renewal of a license, disciplinary action, or further administrative or civil proceedings. If you are unable to complete the correction within the time provided because of conditions beyond your control after the exercise of reasonable diligence, you may request an extension of time in which to correct the violation. The request shall be made in writing and submitted to the Department, at Guadalupe.sanchez@cannabis.ca.gov within the time set forth for abatement. The time to abate or correct may be extended for good cause.

APPEALING THE CITATION

To appeal the citation, you may request an informal conference with the Department, or request a formal hearing to contest the citation before an Administrative Law Judge, or both. Requests must be submitted in writing in accordance with the timeframes specified below or the right to a hearing is waived. If a hearing is not requested, payment of a fine will not constitute an admission of the violation charged.

INFORMAL CONFERENCE

You may request an informal conference with the Department regarding the acts or omissions found in the citation in accordance with CCR, title 4, section 17803. During an informal conference, you may present evidence supporting an adjustment to the citation and/or fine(s). The Department may affirm, modify, or dismiss the citation, including any fines assessed or orders of abatement issued. The informal conference may also resolve any matters relating to the citation through a settlement agreement.

To request an informal conference, your request must be in writing and submitted to the Department at Guadalupe.sanchez@cannabis.ca.gov, within 15 calendar days from service of this citation. The informal conference may be conducted by telephone, through a virtual platform, or in person, at the Department's Headquarters, located at 2920 Kilgore Road, Rancho Cordova, California 95670. The informal conference will be held within 15 calendar days from receipt of the written request by the Department.



Requesting an informal conference does not stay or toll the running of the 30-day period for you to request a formal hearing to contest the citation before an Administrative Law Judge. You should request an informal conference as soon as possible if you would like to allow time to hold the conference prior to the deadline for contesting the citation as the time to contest a citation does not stop if you request an informal conference.

At the conclusion of the informal conference, a written decision stating the reasons for the decision will be mailed to you within 15 calendar days from the date of the informal conference, which shall be deemed a final order. If the citation is dismissed, any request for a formal hearing shall be deemed withdrawn. If the citation is affirmed or modified, you may either withdraw the request for a formal hearing or proceed with the hearing. If the citation is modified, the original citation shall be considered withdrawn and a new citation issued. A request for a formal hearing on the new citation must be submitted to the Department in writing within 30 calendar days of issuance of the new citation.

CONTESTING THE CITATION

You have a right to contest the finding of a violation before an Administrative Law Judge by requesting a formal hearing. To request a formal hearing, your request must be in writing and submitted to the Department within 30 calendar days from service of the citation. If a request is not received by the Department within 30 calendar days, the right to a hearing is waived, and the citation becomes final and not subject to review by any court. The hearing shall be held pursuant to the Administrative Procedure Act (Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code). Written requests for a hearing to contest the finding of a violation must be emailed to appeals@cannabis.ca.gov or submitted in hard copy by mail or delivery to:

U.S. Postal Service	FedEx or USPS
Department of Cannabis Control Legal Affairs Division PO Box 419106 Rancho Cordova, CA 95741	Department of Cannabis Control Legal Affairs Division 2920 Kilgore Road Rancho Cordova, CA 95670

The Department may seek recovery of the reasonable costs of investigation and enforcement pursuant to Business and Profession Code section 26031.1 at the formal hearing on the citation.



Issued To: Shield Management Group, LLC
License/Case No: C11-0000171-LIC/DCC24-0000262-INV
Issued By: Evelyn Schaeffer
Date: December 27, 2024
Page 11 of 11

If you have any questions regarding this citation or the appeals process, please contact Guadalupe Sanchez at Guadalupe.sanchez@cannabis.ca.gov or (916) 956-7907.

Date: December 27, 2024

Evelyn Schaeffer
Deputy Director
Compliance Division
Department of Cannabis Control

By: Evelyn Schaeffer
Evelyn Schaeffer
Deputy Director
Compliance Division
Department of Cannabis Control



Department of
Cannabis Control
CALIFORNIA

Citation
Form DCC-8107 | Revision Date: 07.19.2022

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

Case Name: **In the Matter of the Appeal of Citation Issued Against Shield Management Group, LLC dba West Coast Cure**

Case No.: **DCC24-0000262-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. 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 December 30, 2024, I served the attached **AMENDED CITATION, FINE AND ORDER OF ABATEMENT** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **AMENDED CITATION, FINE AND ORDER OF ABATEMENT** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, addressed as follows:

Logan Wasserman
Shield Management Group, LLC
12362 Beach Blvd., Suite 15
Stanton, CA, 90680
Respondent

Logan Wasserman
Shield Management Group, LLC
43 Discovery, Suite 200
Irvine, CA 92603
Respondent

Certified Article Number

9414 7266 9904 2226 4386 62

SENDER'S RECORD

Certified Article Number

9414 7266 9904 2226 4386 55

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 December 30, 2024, at Los Angeles, California.

Michelle Sandoval
Declarant

Michelle Sandoval
Signature

PROOF OF SERVICE

Case Name: In the Matter of the Appeals of the Citations Against: Shield Management Group, LLC
dba West Coast Cure
DCC Case Nos. DCC24-0000261-INV & DCCC24-0000262-INV
OAH Case Nos. 2025020647 & 2025020650
License Nos: C11-0000171-LIC, Commercial-Distributor; DCC-10003818, Manufacturer-Type 7

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 December 29, 2025, I served the within documents:

ORDER ADOPTING STIPULATED SETTLEMENT AS FINAL DECISION

- 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.

Shield Management Group, LLC
dba West Coast Cure
Douglas Francis, Owner
Jerett Wasserman, Owner
Logan Wasserman, Owner
logan@wcc.com

Craig S. Wasserman, Esq.
Respondent's Attorney
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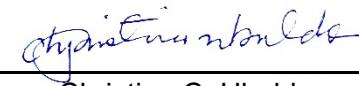
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I am familiar with the Department's business practices for collecting and transmitting mail through the United States Postal Service. In accordance with those practices, correspondence placed in the Department's internal mail collection system is, 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 December 29, 2025, at Rancho Cordova, California.



Christina C. Ubaldo