



Department of
Cannabis Control
CALIFORNIA

Gavin Newsom
Governor

Clint Kellum
Director

May 21, 2026

VIA EMAIL AND CERTIFIED MAIL

LA Green Rush LLC
Daniel Shon, DRP/Owner
700 Flower St., Ste. 29
Los Angeles, CA 90017
lytfounders@gmail.com
lagreenrushllc@gmail.com

Gabriella S. Barnes, Owner
LA Green Rush LLC
1412 S Gerhart Ave.
Commerce, CA 90022
gabysylvia@yahoo.com

Re: LA Green Rush LLC - Case No. DCC25-0001665-INV
Default Decision and Order

Dear Mr. Shon and Ms. Barnes:

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

Be advised that Government Code section 11520, subdivision (c), provides that Respondent may serve a written motion requesting that the Decision be vacated upon stating the ground relied on within seven (7) days after service of the Decision. Respondent may address any written motion to the Department via email at DCCDecisions@cannabis.ca.gov, or by post or courier to:

Department of Cannabis Control
Office of the General Counsel
2920 Kilgore Road
Rancho Cordova, CA 95670

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 LA Green Rush LLC will become effective on June 22, 2026.

Sincerely,

Douglas Smurr
Assistant General Counsel

Enclosure

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

In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

**LA GREEN RUSH LLC;
DANIEL SHON, DRP/OWNER
1412 S. Gerhart Avenue
Commerce, CA 90022**

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

**Cannabis Distributor License
No. C11-0000658-LIC**

**Cannabis Manufacturer - Type P License
No. DCC-10004270**

Respondent.

FINDINGS OF FACT

1. On or about April 6, 2026, Complainant Evelyn Schaeffer, in her official capacity as the Deputy Director of the Compliance Division of the Department of Cannabis Control, filed Accusation No. DCC25-0001665-INV against LA Green Rush LLC (Respondent) with Daniel Shon as Designated Responsible Party and Owner (DRP/Owner) before the Department of Cannabis Control. (Accusation is attached as Exhibit A.)

2. On or about July 3, 2019, the Department of Cannabis Control (Department) issued Cannabis Distributor License No. C11-0000658-LIC to Respondent. The Cannabis Distributor License was in full force and effect at all times relevant to the charges brought in Accusation No. DCC25-0001665-INV and will expire on July 2, 2026, unless renewed.

1 3. On or about July 21, 2025, the Department of Cannabis Control issued Cannabis
2 Manufacturer - Type P License No. DCC-10004270 to Respondent. The Cannabis Manufacturer
3 - Type P License was in full force and effect at all times relevant to the charges brought in
4 Accusation No. DCC25-0001665-INV and will expire on July 21, 2026, unless renewed.

5 4. On or about April 7, 2026, Respondent was served by Certified and First Class Mail
6 copies of the Accusation No. DCC25-0001665-INV, Statement to Respondent, Notice of
7 Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5,
8 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of
9 Regulations, title 4, section 15002, is required to be reported and maintained with the
10 Department. Respondent's address of record was and is: 1412 S. Gerhart Avenue, Commerce,
11 CA 90022.

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

14 6. Government Code section 11506(c) states, in pertinent part:

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

20 7. The Department takes official notice of its records and the fact that Respondent failed
21 to file a Notice of Defense within 15 days after service upon them of the Accusation, and
22 therefore waived its right to a hearing on the merits of Accusation No. DCC25-0001665-INV.

23 8. California Government Code section 11520(a) states, in pertinent part:

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

28 9. Pursuant to its authority under Government Code section 11520, the Department finds
Respondent is in default. The Department will take action without further hearing and, based on
the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this

1 matter, finds that the charges and allegations in Accusation No. DCC25-0001665-INV, are
2 separately and severally, found to be true and correct by clear and convincing evidence.

3 10. The Department finds that the actual costs for Investigation and Enforcement are
4 \$5,743.75 as of May 12, 2026.

5 **DETERMINATION OF ISSUES**

6 1. Based on the foregoing findings of fact, Respondent LA Green Rush LLC has
7 subjected its Cannabis Distributor License No. C11-0000658-LIC and Cannabis Manufacturer -
8 Type P License No. DCC-10004270 to discipline.

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

10 3. The Department of Cannabis Control is authorized to revoke Respondent's Cannabis
11 Distributor and Manufacturer Licenses based upon the following violations alleged in the
12 Accusation which are supported by the evidence contained in the Default Decision Investigatory
13 Evidence Packet in this case:

- 14 a. Violation of Business and Professions Code section 26030, subdivisions (a) and
15 (c), and Title 4 of the California Code of Regulations, sections 15000.3,
16 subdivision (d), and 17800, subdivision (a); [Failure to provide the Department
17 with full and immediate access to the licensed premises]
- 18 b. Violation of Business and Professions Code section 26030, subdivisions (a) and
19 (c), and Title 4 of the California Code of Regulations, sections 17800,
20 subdivision (b), and 17801; [Failure to participate and cooperate in the
21 inspection and investigation and to respond to the Department's inquiries,
22 requests, and Notice to Comply]
- 23 c. Violation of Business and Professions Code section 26030, subdivisions (a) and
24 (c), and Title 4 of the California Code of Regulations, sections 15037,
25 subdivision (a), 15044, subdivision (i), and 15047.2, subdivisions (b) and (d);
26 [Refusal, obstruction, and/or interference with the Department's inspection of
27 its premises and records; failure to accurately record all commercial cannabis
28 activity in the California Cannabis Track and Trace (CCTT) system; failure to

1 provide the Department with records related to its commercial cannabis activity
2 upon request]

3 d. Violation of Business and Professions Code section 26030, subdivisions (a) and
4 (c), and Title 4 of the California Code of Regulations, section 15000.1,
5 subdivision (c); [Failure to conduct only the commercial cannabis activity
6 authorized by its licenses on the licensed premises]

7 e. Violation of Business and Professions Code section 26030, subdivisions (a) and
8 (c), and Title 4 of the California Code of Regulations, section 15000.7; [Failure
9 to store cannabis and cannabis products at the licensed premises after
10 acceptance of inbound transfer manifests after vacating the premises]

11 **ORDER**

12 IT IS SO ORDERED that Cannabis Distributor License No. C11-0000658-LIC and
13 Cannabis Manufacturer - Type P License No. DCC-10004270, issued to Respondent LA Green
14 Rush LLC with Daniel Shon as DRP/Owner, are revoked.

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

19 This Decision shall become effective on June 22, 2026.

20 IT IS SO ORDERED, May 21, 2026.

21 

22 _____
23 Douglas Smurr
24 Assistant General Counsel
25 FOR THE DEPARTMENT OF CANNABIS CONTROL

25 Default Decision and Order - LIC.docx
26 DOJ Matter ID:LA2026800993

26 Attachment:
27 Exhibit A: Accusation

Exhibit A

Accusation

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
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*

7
8 **BEFORE THE**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10
11 In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

12 **LA GREEN RUSH, LLC**
DANIEL SHON, DRP/OWNER
13 **1412 South Gerhart Ave.**
Commerce, CA 90022

ACCUSATION

14 **Cannabis Distributor License**
15 **No. C11-0000658-LIC**

16 **Cannabis Manufacturer – Type P License**
17 **No. DCC-10004270**

18 Respondent.

19 **PARTIES**

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

23 2. On or about July 3, 2019, the Department issued Cannabis - Distributor License
24 No. C11-0000658-LIC to LA Green Rush, LLC (Respondent), with Daniel Shon as Designated
25 Responsible Party and Owner (DRP/Owner Shon). The Cannabis - Distributor License was in
26 full force and effect at all times relevant to the charges brought herein and will expire on July 2,
27 2026, unless renewed.

28 ///

1 Division 3 of Title 2 of the Government Code. Those rules and regulations shall be
2 consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of
3 Marijuana Act.

4 10. Section 26031 of the Code states:

5 (a) The department may suspend, revoke, place on probation with terms and
6 conditions, or otherwise discipline licenses issued by the department and fine a
7 licensee, after proper notice and hearing to the licensee, except as provided in Section
8 26031.01, if the licensee is found to have committed any of the acts or omissions
9 constituting grounds for disciplinary action. The disciplinary proceedings under this
10 chapter shall be conducted in accordance with Chapter 5 (commencing with Section
11 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director
12 shall have all the powers granted therein.

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

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

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

11. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

12. Section 26030 of the Code states:

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

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

3 ...

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

6 ...

7 13. Section 26160 of the Code states:

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

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

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

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

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

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

27 **REGULATORY PROVISIONS**

28 14. Title 4 of the California Code of Regulations, section 15000.1, states in part:

...
29

30 (c) The licensee shall only conduct commercial cannabis activities authorized
31 by the license and on the premises licensed for the activity.

32 ...

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

34 ...

35 (d) Licensees shall ensure that the Department has immediate access to their licensed

1 premises. If the Department is denied access to a licensee's premises for any reason,
2 the licensee shall be held responsible and subject to discipline. If the Department is
3 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.

4 16. Title 4 of the California Code of Regulations, section 15000.7, states, in part:

5 (a) All cannabis and cannabis products must be stored within the licensed
6 premises....

7 17. Title 4 of the California Code of Regulations, section 15037, states in part:

8 (a) Licensees must keep and maintain records in connection with the licensed
9 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
limited to:

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

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

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

17 (4) Contracts regarding commercial cannabis activity.

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

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

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

22 ...

23 18. Title 4 of the California Code of Regulations, section 15044, states, in part:

24 ...

25 (i) Surveillance recordings are subject to inspection by the Department and shall be
26 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
27 provide copies of the recordings to the Department upon request within the time specified
by the Department.

28 ...

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

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

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

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

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

12 20. Title 4 of the California Code of Regulations, section 17800, states in part:

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

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

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

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

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

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

...

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

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

(b) The Notice to Comply shall be in writing and describe the nature and facts

1 of each violation, including a reference to the statute or regulation violated, and may
2 indicate the manner in which the licensee must correct the violation(s) to achieve
compliance.

3 (c) The Department may serve the Notice to Comply personally, by email, or by
4 mail to the licensee or an employee, agent, or person delegated by the licensee to
accept notice.

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

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

10 **COST RECOVERY**

11 22. Section 26031.1 of the Code states:

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

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

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

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

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

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

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

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

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

8 **FACTUAL ALLEGATIONS**

9 23. On August 6, 2025, at approximately 9:30 a.m., Department staff went to
10 Respondent's licensed premises to conduct a regulatory compliance inspection. Department staff
11 reviewed Respondent's California Cannabis Track and Trace (CCTT) account inventory and
12 verified that Respondent had approximately 33,553 units of cannabis and cannabis products and
13 45,767 pounds of cannabis in its Distributor License inventory; and 29.3 liters, 74,547 units, and
14 43,987 grams of cannabis product and 19 pounds of cannabis in its Manufacturer License
15 inventory.¹

16 24. There was no response when Department staff knocked on the doors to the licensed
17 premises. Department staff called the phone number listed on file for DRP/Owner Shon.²
18 DRP/Owner Shon did not answer the phone call, and Department staff left a voicemail message
19 identifying themselves, explaining that they were outside Respondent's licensed premises to
20 perform an inspection, and requesting a call back as soon as possible to arrange access to the
21 licensed premises for the inspection.

22 25. At or about 10:30 a.m., while still outside Respondent's licensed premises,
23 Department staff sent DRP/Owner Shon an email at the email address on file for DRP/Owner
24 Shon and Respondent in the Department's licensing database. A Notice to Comply was sent as an

25
26 ¹ Respondent's CCTT account inventory also showed 919 units of cannabis product and
27 3,243 units of cannabis in its expired Cannabis Retailer Non-Storefront License (C9-0000249-
LIC) inventory. .

28 ² Owners, as defined by Business and Professions Code section 26001, subdivision (av),
for Respondent's Licenses are Daniel Shon and Gabriella Sylvia Barnes.

1 attachment to the email. The Notice to Comply required Respondent to provide Department staff
2 access to the licensed premises for purposes of an inspection by no later than 5:00 p.m. that same
3 day, and to provide business records, including employee records, all inbound and outbound
4 transfer invoices from July 1, 2025 to August 6, 2025, and the continuous video surveillance
5 footage from all interior and exterior cameras at the licensed premises from August 1, 2025 to
6 August 6, 2025, also by 5:00 p.m. Department staff did not receive a response from Respondent
7 or DRP/Owner Shon.

8 26. On September 4, 2025, Department staff reviewed Respondent's CCTT accounts to
9 search for transfers that were scheduled to arrive at Respondent's licensed premises on August 6,
10 2025. According to the entries in Respondent's CCTT accounts, there were sixty-two (62)
11 transfers scheduled to arrive at Respondent's licensed premises on August 6, 2025. The earliest
12 transfer was scheduled to arrive at 7:30 a.m. that day and three transfers were scheduled to arrive
13 before the time that Department staff departed the licensed premises at 10:35 a.m. Department
14 staff further discovered that since the attempted inspection of Respondent's licensed premises on
15 August 6, 2025, there had been approximately 1,588 transfers scheduled to arrive at Respondent's
16 licensed premises with a total of approximately 12,582 packages of cannabis and cannabis goods
17 transferred.

18 27. On March 4, 2026, at approximately 11:15 a.m., Department staff went to
19 Respondent's licensed premises to perform an unannounced regulatory compliance inspection.
20 An individual answered the door and told Department staff that the location was a video and
21 lighting business called "J.L." and there was no cannabis business at the location. Department
22 staff entered the premises and confirmed that the location did not contain any cannabis. The
23 individual told Department staff that the present occupant had purchased and occupied the
24 licensed premises for approximately eight months, or since sometime in July or August 2025.

25 28. On March 24, 2026, Department staff searched Respondent's CCTT accounts for
26 current cannabis inventory for both its licenses. Respondent's Distributor License CCTT account
27 inventory reported approximately 2,374,422 units of cannabis and cannabis products and 625,850
28 pounds of cannabis in inventory. Respondent's Manufacturer License CCTT account inventory

1 reported approximately 1,050,821 units of cannabis product, 102.1 liters of cannabis product,
2 30,865.4 pounds of cannabis product, and 59,887.3 pounds of cannabis in inventory. Of the
3 83,778 cannabis packages recorded in the inventories for both of Respondent's licenses, 51,693
4 packages had never been submitted for regulatory compliance testing.

5 29. On March 25, 2026, Department staff reviewed Respondent's CCTT accounts for all
6 recorded transfers of cannabis and cannabis products received by Respondent from March 4 to
7 25, 2026. During that period there were 1,261 separate transfers recorded as being sent to
8 Respondent's licensed premises. Of those 1,261 transfers, 974 were accepted by Respondent.

9 30. To date, no response has been received from Respondent regarding the NTC issued
10 on August 6, 2025.

11 **FIRST CAUSE FOR DISCIPLINE**

12 (Right of Access)

13 31. Respondent is subject to disciplinary action under Code section 26030, subdivisions
14 (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d), and
15 17800, subdivision (a), in that Respondent failed to provide the Department with full and
16 immediate access to the licensed premises for purposes of conducting a regulatory inspection and
17 to confirm the regulatory testing status and whereabouts of cannabis and cannabis product
18 reported in the Licensee's inventories as more particularly alleged in paragraphs 23 through 30,
19 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

20 **SECOND CAUSE FOR DISCIPLINE**

21 (Cooperation and Notice to Comply)

22 32. Respondent is further subject to disciplinary action under Code section 26030,
23 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 17800, subdivision
24 (b), and 17801, in that Respondent failed to participate and cooperate in the inspection and
25 investigation and to respond to the Department's inquiries, requests, and Notice to Comply as
26 more particularly alleged in paragraphs 23 through 30, above, which are hereby incorporated by
27 reference and realleged as if fully set forth herein.

28 ///

1 **THIRD CAUSE FOR DISCIPLINE**

2 (Accurate Records of Commercial Cannabis Activity)

3 33. Respondent is further subject to disciplinary action under Code sections 26030,
4 subdivisions (a) and (c), and 26160, subdivisions (a) through (e), and California Code of
5 Regulations, title 4, sections 15037, subdivision (a), 15044, subdivision (i), and 15047.2,
6 subdivisions (b) and (d), in that Respondent refused, impeded, obstructed and/or interfered with
7 the Department’s inspection of its premises and records, failed to accurately record all
8 commercial cannabis activity in the California Cannabis Track and Trace (CCTT) system, and
9 failed to provide the Department with records related to its commercial cannabis activity upon
10 request, including video surveillance camera footage, copies of invoices for outbound and
11 inbound transfers, and employee records as more particularly alleged in paragraphs 23 through
12 30, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

13 **FOURTH CAUSE FOR DISCIPLINE**

14 (General Requirements: Cannabis Activity)

15 34. Respondent is further subject to disciplinary action under Code section 26030,
16 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.1, subdivision
17 (c), in that Respondent failed to conduct only the commercial cannabis activity authorized by its
18 licenses on the licensed premises as more particularly alleged in paragraphs 23 through 30, above,
19 which are hereby incorporated by reference and realleged as if fully set forth herein.

20 **FIFTH CAUSE FOR DISCIPLINE**

21 (Storage of Inventory)

22 35. Respondent is further subject to disciplinary action under Code section 26030,
23 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.7, subdivision
24 (a), in that Respondent failed to store cannabis and cannabis products at the licensed premises
25 after acceptance of inbound transfer manifests after vacating the premises as more particularly
26 alleged in paragraphs 23 through 30, above, which are hereby incorporated by reference and
27 realleged as if fully set forth herein.

28 ///

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that the following the hearing, the Director of Department of Cannabis Control 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 C11-0000658-LIC, issued to LA Green Rush, LLC, with DRP/Owner Daniel Shon;

2. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Manufacturer - Type P License Number DCC-10004270, issued to LA Green Rush, LLC, with DRP/Owner Daniel Shon;


3. Ordering LA Green Rush, LLC, with DRP/Owner Daniel Shon 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;

4. Ordering the destruction of cannabis and cannabis goods in the possession of LA Green Rush, LLC, with DRP/Owner Daniel Shon, at Respondent's expense, if revocation of Cannabis - Distributor License Number C11-0000658-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

5. Ordering the destruction of cannabis and cannabis goods in the possession of LA Green Rush, LLC, with DRP/Owner Daniel Shon, at Respondent's expense, if revocation of Cannabis - Manufacturer - Type P License Number DCC-10004270 is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

DATED: 4/6/2026

 for

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

LA2026800993

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

In the Matter of the Accusation Against:

**LA GREEN RUSH LLC;
DANIEL SHON, DRP/OWNER
1412 S. Gerhart Avenue
Commerce, CA 90022**

**Cannabis Distributor License
No. C11-0000658-LIC**

**Cannabis Manufacturer - Type P License
No. DCC-10004270**

Respondent.

Case No. DCC25-0001665-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. DCC25-0001665-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), proof(s) of service;

Exhibit 2: License History Certifications for LA Green Rush LLC Cannabis Distributor License No. C11-0000658-LIC and Cannabis Manufacturer - Type P License No. DCC-10004270;

Exhibit 3: Certification of Costs by Department for Investigation in Case No. DCC25-0001665-INV dated May 12, 2026;

Exhibit 4: Certification of Costs by the Attorney General's Office for Enforcement in Case No. DCC25-0001665-INV dated May 19, 2026;

Exhibit 5: Investigative Report (without attachments) [Case No. DCC25-0001665-INV];

Dated: May 19, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California



HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

Exhibit 1

Accusation No. DCC25-0001665-INV
Statement to Respondent
Notice of Defense
Request for Discovery
Discovery Statutes, Proofs of Service

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

11 **BEFORE THE**
12 **DEPARTMENT OF CANNABIS CONTROL**
13 **STATE OF CALIFORNIA**

14 In the Matter of the Accusation Against:

15 **LA GREEN RUSH, LLC;**
16 **DANIEL SHON, DRP/OWNER**

17 Respondent.

18 Case No. DCC25-0001665-INV

19 **STATEMENT TO RESPONDENT**

20 [Gov. Code §§ 11504, 11505(b)]

21 **TO RESPONDENT:**

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

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

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

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

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

2 The enclosed Notice of Defense, if signed and filed with the Department, shall be deemed a
3 specific denial of all parts of the Accusation, but you will not be permitted to raise any objection
4 to the form of the Accusation unless you file a further Notice of Defense as provided in section
5 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

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

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

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

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

17 **NOTICE REGARDING STIPULATED SETTLEMENTS**

18 It may be possible to avoid the time, expense and uncertainties involved in an
19 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated
20 settlement is a binding written agreement between you and the government regarding the matters
21 charged and the discipline to be imposed. Such a stipulation would have to be approved by the
22 Department of Cannabis Control but, once approved, it would be incorporated into a final order.

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

27 ///

28 ///

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

4 Dated: April 7, 2026

ROB BONTA
Attorney General of California

Harinder Kapur

HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

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11 85650564.docx

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
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*

7
8 **BEFORE THE**
DEPARTMENT OF CANNABIS CONTROL
9 **STATE OF CALIFORNIA**

10
11 In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

12 **LA GREEN RUSH, LLC**
DANIEL SHON, DRP/OWNER
13 **1412 South Gerhart Ave.**
Commerce, CA 90022

ACCUSATION

14 **Cannabis Distributor License**
15 **No. C11-0000658-LIC**

16 **Cannabis Manufacturer – Type P License**
17 **No. DCC-10004270**

18 Respondent.

19 **PARTIES**

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

23 2. On or about July 3, 2019, the Department issued Cannabis - Distributor License
24 No. C11-0000658-LIC to LA Green Rush, LLC (Respondent), with Daniel Shon as Designated
25 Responsible Party and Owner (DRP/Owner Shon). The Cannabis - Distributor License was in
26 full force and effect at all times relevant to the charges brought herein and will expire on July 2,
27 2026, unless renewed.

28 ///

1 Division 3 of Title 2 of the Government Code. Those rules and regulations shall be
2 consistent with the purposes and intent of the Control, Regulate and Tax Adult Use of
3 Marijuana Act.

4 10. Section 26031 of the Code states:

5 (a) The department may suspend, revoke, place on probation with terms and
6 conditions, or otherwise discipline licenses issued by the department and fine a
7 licensee, after proper notice and hearing to the licensee, except as provided in Section
8 26031.01, if the licensee is found to have committed any of the acts or omissions
9 constituting grounds for disciplinary action. The disciplinary proceedings under this
10 chapter shall be conducted in accordance with Chapter 5 (commencing with Section
11 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director
12 shall have all the powers granted therein.

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

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

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

11. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

12. Section 26030 of the Code states:

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

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

3 ...

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

6 ...

7 13. Section 26160 of the Code states:

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

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

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

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

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

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

27 **REGULATORY PROVISIONS**

28 14. Title 4 of the California Code of Regulations, section 15000.1, states in part:

...
29

30 (c) The licensee shall only conduct commercial cannabis activities authorized
31 by the license and on the premises licensed for the activity.

32 ...

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

34 ...

35 (d) Licensees shall ensure that the Department has immediate access to their licensed

1 premises. If the Department is denied access to a licensee's premises for any reason,
2 the licensee shall be held responsible and subject to discipline. If the Department is
3 denied access to one licensee's premises because of another licensee's refusal to grant
4 access when the only access to one licensed premises is through another licensed
5 premises, all licensees shall be held responsible and subject to discipline.

6
7 16. Title 4 of the California Code of Regulations, section 15000.7, states, in part:

8 (a) All cannabis and cannabis products must be stored within the licensed
9 premises....

10
11 17. Title 4 of the California Code of Regulations, section 15037, states in part:

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

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

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

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

25 (4) Contracts regarding commercial cannabis activity.

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

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

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

...

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

...

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

...

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

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

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

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

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

12 20. Title 4 of the California Code of Regulations, section 17800, states in part:

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

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

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

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

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

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

...

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

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

(b) The Notice to Comply shall be in writing and describe the nature and facts

1 of each violation, including a reference to the statute or regulation violated, and may
2 indicate the manner in which the licensee must correct the violation(s) to achieve
compliance.

3 (c) The Department may serve the Notice to Comply personally, by email, or by
4 mail to the licensee or an employee, agent, or person delegated by the licensee to
accept notice.

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

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

10 **COST RECOVERY**

11 22. Section 26031.1 of the Code states:

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

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

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

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

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

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

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

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

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

8 **FACTUAL ALLEGATIONS**

9 23. On August 6, 2025, at approximately 9:30 a.m., Department staff went to
10 Respondent's licensed premises to conduct a regulatory compliance inspection. Department staff
11 reviewed Respondent's California Cannabis Track and Trace (CCTT) account inventory and
12 verified that Respondent had approximately 33,553 units of cannabis and cannabis products and
13 45,767 pounds of cannabis in its Distributor License inventory; and 29.3 liters, 74,547 units, and
14 43,987 grams of cannabis product and 19 pounds of cannabis in its Manufacturer License
15 inventory.¹

16 24. There was no response when Department staff knocked on the doors to the licensed
17 premises. Department staff called the phone number listed on file for DRP/Owner Shon.²
18 DRP/Owner Shon did not answer the phone call, and Department staff left a voicemail message
19 identifying themselves, explaining that they were outside Respondent's licensed premises to
20 perform an inspection, and requesting a call back as soon as possible to arrange access to the
21 licensed premises for the inspection.

22 25. At or about 10:30 a.m., while still outside Respondent's licensed premises,
23 Department staff sent DRP/Owner Shon an email at the email address on file for DRP/Owner
24 Shon and Respondent in the Department's licensing database. A Notice to Comply was sent as an

25
26 ¹ Respondent's CCTT account inventory also showed 919 units of cannabis product and
27 3,243 units of cannabis in its expired Cannabis Retailer Non-Storefront License (C9-0000249-
LIC) inventory. .

28 ² Owners, as defined by Business and Professions Code section 26001, subdivision (av),
for Respondent's Licenses are Daniel Shon and Gabriella Sylvia Barnes.

1 attachment to the email. The Notice to Comply required Respondent to provide Department staff
2 access to the licensed premises for purposes of an inspection by no later than 5:00 p.m. that same
3 day, and to provide business records, including employee records, all inbound and outbound
4 transfer invoices from July 1, 2025 to August 6, 2025, and the continuous video surveillance
5 footage from all interior and exterior cameras at the licensed premises from August 1, 2025 to
6 August 6, 2025, also by 5:00 p.m. Department staff did not receive a response from Respondent
7 or DRP/Owner Shon.

8 26. On September 4, 2025, Department staff reviewed Respondent's CCTT accounts to
9 search for transfers that were scheduled to arrive at Respondent's licensed premises on August 6,
10 2025. According to the entries in Respondent's CCTT accounts, there were sixty-two (62)
11 transfers scheduled to arrive at Respondent's licensed premises on August 6, 2025. The earliest
12 transfer was scheduled to arrive at 7:30 a.m. that day and three transfers were scheduled to arrive
13 before the time that Department staff departed the licensed premises at 10:35 a.m. Department
14 staff further discovered that since the attempted inspection of Respondent's licensed premises on
15 August 6, 2025, there had been approximately 1,588 transfers scheduled to arrive at Respondent's
16 licensed premises with a total of approximately 12,582 packages of cannabis and cannabis goods
17 transferred.

18 27. On March 4, 2026, at approximately 11:15 a.m., Department staff went to
19 Respondent's licensed premises to perform an unannounced regulatory compliance inspection.
20 An individual answered the door and told Department staff that the location was a video and
21 lighting business called "J.L." and there was no cannabis business at the location. Department
22 staff entered the premises and confirmed that the location did not contain any cannabis. The
23 individual told Department staff that the present occupant had purchased and occupied the
24 licensed premises for approximately eight months, or since sometime in July or August 2025.

25 28. On March 24, 2026, Department staff searched Respondent's CCTT accounts for
26 current cannabis inventory for both its licenses. Respondent's Distributor License CCTT account
27 inventory reported approximately 2,374,422 units of cannabis and cannabis products and 625,850
28 pounds of cannabis in inventory. Respondent's Manufacturer License CCTT account inventory

1 reported approximately 1,050,821 units of cannabis product, 102.1 liters of cannabis product,
2 30,865.4 pounds of cannabis product, and 59,887.3 pounds of cannabis in inventory. Of the
3 83,778 cannabis packages recorded in the inventories for both of Respondent's licenses, 51,693
4 packages had never been submitted for regulatory compliance testing.

5 29. On March 25, 2026, Department staff reviewed Respondent's CCTT accounts for all
6 recorded transfers of cannabis and cannabis products received by Respondent from March 4 to
7 25, 2026. During that period there were 1,261 separate transfers recorded as being sent to
8 Respondent's licensed premises. Of those 1,261 transfers, 974 were accepted by Respondent.

9 30. To date, no response has been received from Respondent regarding the NTC issued
10 on August 6, 2025.

11 **FIRST CAUSE FOR DISCIPLINE**

12 (Right of Access)

13 31. Respondent is subject to disciplinary action under Code section 26030, subdivisions
14 (a) and (c), and California Code of Regulations, title 4, sections 15000.3, subdivision (d), and
15 17800, subdivision (a), in that Respondent failed to provide the Department with full and
16 immediate access to the licensed premises for purposes of conducting a regulatory inspection and
17 to confirm the regulatory testing status and whereabouts of cannabis and cannabis product
18 reported in the Licensee's inventories as more particularly alleged in paragraphs 23 through 30,
19 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

20 **SECOND CAUSE FOR DISCIPLINE**

21 (Cooperation and Notice to Comply)

22 32. Respondent is further subject to disciplinary action under Code section 26030,
23 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 17800, subdivision
24 (b), and 17801, in that Respondent failed to participate and cooperate in the inspection and
25 investigation and to respond to the Department's inquiries, requests, and Notice to Comply as
26 more particularly alleged in paragraphs 23 through 30, above, which are hereby incorporated by
27 reference and realleged as if fully set forth herein.

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THIRD CAUSE FOR DISCIPLINE

(Accurate Records of Commercial Cannabis Activity)

33. 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), and 15047.2, subdivisions (b) and (d), in that Respondent refused, impeded, obstructed and/or interfered with the Department’s inspection of its premises and records, failed to accurately record all commercial cannabis activity in the California Cannabis Track and Trace (CCTT) system, and failed to provide the Department with records related to its commercial cannabis activity upon request, including video surveillance camera footage, copies of invoices for outbound and inbound transfers, and employee records as more particularly alleged in paragraphs 23 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE

(General Requirements: Cannabis Activity)

34. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.1, subdivision (c), in that Respondent failed to conduct only the commercial cannabis activity authorized by its licenses on the licensed premises as more particularly alleged in paragraphs 23 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FIFTH CAUSE FOR DISCIPLINE

(Storage of Inventory)

35. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15000.7, subdivision (a), in that Respondent failed to store cannabis and cannabis products at the licensed premises after acceptance of inbound transfer manifests after vacating the premises as more particularly alleged in paragraphs 23 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

///

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that the following the hearing, the Director of Department of Cannabis Control 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 C11-0000658-LIC, issued to LA Green Rush, LLC, with DRP/Owner Daniel Shon;

2. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Manufacturer - Type P License Number DCC-10004270, issued to LA Green Rush, LLC, with DRP/Owner Daniel Shon;


3. Ordering LA Green Rush, LLC, with DRP/Owner Daniel Shon 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;

4. Ordering the destruction of cannabis and cannabis goods in the possession of LA Green Rush, LLC, with DRP/Owner Daniel Shon, at Respondent's expense, if revocation of Cannabis - Distributor License Number C11-0000658-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

5. Ordering the destruction of cannabis and cannabis goods in the possession of LA Green Rush, LLC, with DRP/Owner Daniel Shon, at Respondent's expense, if revocation of Cannabis - Manufacturer - Type P License Number DCC-10004270 is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

DATED: 4/6/2026

 for

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

LA2026800993

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
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*

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

10 In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

11 LA GREEN RUSH, LLC;
12 DANIEL SHON, DRP/ OWNER

REQUEST FOR DISCOVERY

13 Respondent.

14 TO RESPONDENT:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Dated: April 7, 2026

ROB BONTA
Attorney General of California



HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

LA2026800993
85650564.docx

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

In the Matter of the Accusation Against:

**LA GREEN RUSH, LLC;
DANIEL SHON, DRP/OWNER,**

Respondent.

Case No. DCC25-0001665-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>.

LA2026800993
85650564.docx

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

In the Matter of the Accusation Against:

**LA GREEN RUSH, LLC;
DANIEL SHON, DRP/OWNER,**

Respondent.

Case No. DCC25-0001665-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>.

LA2026800993
85650564.docx

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

SECTION 11507.5: Exclusivity of discovery provisions

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

SECTION 11507.6: Request for discovery

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

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

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

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

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

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

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

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

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

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

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

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

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

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

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

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

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

Case Name: **In the Matter of the Accusation Against LA Green Rush, LLC, Daniel Shon,
DRP/Owner**

No.: **DCC25-0001665-INV**

Declaration of Electronic Service

I declare:

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 600 West Broadway, Suite 1800, San Diego, CA 92101, County of San Diego.
3. My electronic service address is Nellia.Amansec@doj.ca.gov.
4. On April 7, 2026, I electronically served the following document[s]:
 - a. **STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 Copies); and GOVERNMENT CODE SECTION 11507.5, 11507.6 and 11507.7**
5. I electronically served the aforementioned document[s] by emailing them to the following individual[s]:

Email: Lytfounders@gmail.com

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on April 7, 2026.

N. Amansec
Declarant



Signature

Declaration of Service by Certified and First Class Mail

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 April 7, 2026, I served the attached **STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 Copies); and GOVERNMENT CODE SECTION 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 SECTION 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:

LA Green Rush, LLC
Daniel Shon, DRP/Owner
1412 South Gerhart Avenue
Commerce, CA 90022

Certified Article Number
9414 7266 9904 2253 2622 61
SENDER'S RECORD

Daniel Shon, DRP/Owner
700 South Flower Street
Los Angeles, CA 90017

Certified Article Number
9414 7266 9904 2253 2622 78
SENDER'S RECORD

Daniel Shon, DRP/Owner
3509 Venice Blvd.
Los Angeles, CA 90019

Certified Article Number
9414 7266 9904 2253 2622 85
SENDER'S RECORD

Gabriella S. Barnes, Agent for Service
1412 South Gerhart Avenue
Commerce, CA 90022

Certified Article Number
9414 7266 9904 2253 2622 54
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 April 7, 2026, at San Diego, California.

A. Bartholomew
Declarant

A. Bartholomew
Signature

Exhibit 2

License History Certifications for Respondent



CANNABIS MANUFACTURER LICENSE

Adult Use and Medicinal

Business Name:

LA Green Rush LLC
LA Green Rush LLC

License Number: DCC-10004270

License Type: Annual AM-Type P: Packaging and Labeling

Premises Address:

1412 S GERHART AVE
COMMERCE, CA 90022

Valid: 7/21/2025

Expires: 7/21/2026

The license authorizes LA Green Rush LLC to engage in commercial cannabis AM-Type P: Packaging and Labeling 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.



Non-Transferable

Post in Public View



Cannabis Distributor License Adult-Use and Medicinal

Business Name:

LA Green Rush LLC

LA Green Rush LLC

License Number: C11-0000658-LIC

License Type: Distributor

The license authorizes LA Green Rush LLC 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:

1412 GERHART AVE S
COMMERCE, CA 90022-4228

Valid: 7/3/2019

Expires: 7/2/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.



Valid:

7/3/2019

Expires:

7/2/2026

License No:

C11-0000658-LIC

Legal Business Name:

LA Green Rush LLC

LA Green Rush LLC

Premises Address:

1412 GERHART AVE S

COMMERCE, CA 90022-4228

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 using license number C11-0000658-LIC.



Department of
Cannabis Control
CALIFORNIA

Exhibit 3

Certification of Investigation Costs

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

6 In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

7 **LA GREEN RUSH, LLC;**
8 **DANIEL SHON, DRP/OWNER**
9 **1412 South Gerhart Ave.**
10 **Commerce, CA 90022**

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

11 **Cannabis Distributor License**
12 **No. C11-0000658-LIC**

13 **Cannabis Manufacturer – Type P License**
14 **No. DCC-10004270**

Respondent.

15 I, Travis White, declare and certify as follows:

16 1. I am employed as a Supervising Special Investigator (SSI) I within the
17 Investigative Services Branch (ISB) of the Compliance Division of the Department of
18 Cannabis Control (Department) and have personal knowledge of the facts stated herein.

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

23 3. In my official capacity as an SSI I, I review the costs incurred by the Department's
24 ISB in its enforcement of the laws and regulations under the Department's jurisdiction and
25 certify that these costs were incurred by the Department. I am familiar with the time reporting
26 system of the Department's Compliance Division for the reasonable and necessary investigative
27 work performed on a particular case. It is the duty of supervising special investigators to keep
28 track of the time spent and to report that time in the Department's case management system at

1 or near the time of the tasks performed.

2 4. In addition to myself, Special Investigator Matthew McLean was assigned to the
3 investigation of this case, which was opened by the Department's Compliance Division on or
4 about August 6, 2025.

5 5. The summary of investigative and enforcement activities entitled LA Green Rush –
6 Investigative and Enforcement Costs was obtained from the Department's case management
7 system and includes the details of tasks performed by Special Investigators as maintained in
8 the Department's case management system. The costs related to investigative and
9 enforcement activity include field time, research and report writing, and meetings. I hereby
10 certify that the LA Green Rush – Investigative and Enforcement Costs summary, attached
11 hereto and herein incorporated by reference is a true and correct copy of the investigative and
12 enforcement activity for this case. The summary of investigative and enforcement activity
13 encompasses the total hours spent by the Department's ISB through April 29, 2026. The
14 summary of investigative and enforcement activities does not include tasks performed after this
15 date.

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

21 a) Field Time:

22 Rate per hour: \$101.00 multiplied by 12 hours = \$1,212.00

23 b) Research, Report Writing and Review:

24 Rate per hour: \$101.00 multiplied by 19 hours = \$1,919.00

25 c) Meetings:

26 Rate per hour: \$101.00 multiplied by 4 hours = \$404.00

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

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foregoing is true and correct and that this declaration was executed in Sacramento County
on May 12, 2026.

White,
Travis@Cannabis

Digitally signed by White,
Travis@Cannabis
Date: 2026.05.12 13:25:34 -0700

TRAVIS WHITE
Declarant

	B	C	D	E	F	G	H	I	J
6	Last Name	First Name	Hourly Rate	Field + Travel Time	Manager Review	Research/Report	Meetings	Total Hours	Total Expense
7	McLean	Matthew	\$101.00	6		15	2	23	\$2,323.00
8	White	Travis	\$101.00	6	4	0	2	12	\$1,212.00
9								0	\$ -
10								0	\$ -
11								0	\$ -
12								0	\$ -
13								0	\$ -
14								0	\$ -
15								0	\$ -
16								0	\$ -
17								0	\$ -
18								0	\$ -
19				12	4	15	4	35	\$ 3,535.00
20									
21	Operating Expenses								
22	Count	Miles	Total Expenses (Rate \$.725/Mi)					Expenses Grand Total	\$ 3,535.00

Exhibit 4

Certification of Enforcement Costs

1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
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*

7
8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. DCC25-0001665-INV

12 **LA GREEN RUSH LLC;**
13 **DANIEL SHON, DRP/OWNER**

CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF HARINDER K.
KAPUR

Business and Professions Code section
26031.1]

14
15 Respondent.

16
17 I, HARINDER K. KAPUR, hereby declare and certify as follows:

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

24 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance
25 Division of the Department of Cannabis Control, in this action. I was assigned to handle this case
26 on or about March 31, 2026.
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1 3. Our Office's computerized case management system reflects that the following
2 persons have also performed tasks related to this matter: Harinder Kapur, Senior Assistant
3 Attorney General; Helen Koh, Senior Legal Analyst.

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

9 5. On May 11, 2026, I requested a billing summary for this case from the Accounting
10 Department of the DOJ. In response, on May 11, 2026, I received a document entitled "Matter
11 Time Activity by Professional Type." I hereby certify that the Matter Time Activity by
12 Professional Type, attached hereto as Exhibit A, and herein incorporated by reference, is a true
13 and correct copy of the billing summary for this matter that I received from the Accounting
14 Department. The summary includes the billing costs incurred by me, as well as other
15 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the
16 amount of time billed for the activity, and the billing rate by professional type. The billing
17 summary is comprehensive of the charges by the Office to the Department of Cannabis Control
18 through May 11, 2026. It does not include billing for tasks performed after May 11, 2026, up to
19 the date of hearing.

20 6. Based upon the time reported through May 11, 2026, as set forth in Exhibit A, DOJ
21 has billed the Department of Cannabis Control \$2,208.75 for the time spent working on the
22 above-entitled case.

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

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

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Executed on May 19, 2026, in the City of San Diego, California.

Harinder Kapur

HARINDER K. KAPUR
Senior Assistant Attorney General
Declarant

LA2026800993
85704359.docx

Exhibit A



Cost of Suit Summary

As of May 11, 2026

MatterID: LA2026800993
 Description: LA Green Rush, LLC (EDO/ACC)

Date Opened: Mar 31, 2026

Total Legal Costs: \$2,208.75
 Cost of Suit: \$0.00
 Grand Total: \$2,208.75

Totals include WIP time.

Rate	Hrs Wrkd	Amount
Matter Time Activity Summary		
Attorney		
2025-2026		
\$228.00	5.25	\$1,197.00
Total For: 2025-2026		\$1,197.00
Total for: Attorney		\$1,197.00
Paralegal		
2025-2026		
\$213.00	4.75	\$1,011.75
Total For: 2025-2026		\$1,011.75
Total for: Paralegal		\$1,011.75
Total Legal Costs		\$2,208.75

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



Matter Time Activity By Professional Type

As of May 11, 2026

Matter ID: LA2026800993				Date Opened: 03/31/2026					
Description: LA Green Rush, LLC (EDO/ACC)									
Professional Type: Attorney									
Fiscal Year: 2025									
Professional: Harinder K. Kapur									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803505283	3/31/26	CV-CCS:290	02668	Case Management	0.75	\$228.00	\$171.00		3/31/26
803505285	3/31/26	CV-CCS:290	02668	Pleading Preparation	2.50	\$228.00	\$570.00		3/31/26
803507780	4/2/26	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		4/30/26
803508549	4/2/26	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		4/30/26
803511181	4/6/26	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		4/30/26
803511182	4/6/26	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		4/30/26
803511184	4/6/26	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		4/30/26
803512033	4/7/26	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		4/30/26
Harinder K. Kapur Totals:					5.25		\$1,197.00		
2025 Totals:					5.25		\$1,197.00		
Attorney Totals:					5.25		\$1,197.00		



Matter Time Activity By Professional Type

As of May 11, 2026

Matter ID: LA2026800993				Date Opened: 03/31/2026					
Description: LA Green Rush, LLC (EDO/ACC)									
Professional Type: Paralegal									
Fiscal Year: 2025									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803505802	4/1/26	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		4/30/26
803506185	4/1/26	CV-CCS:290	02668	Contract/Document Preparation	1.00	\$213.00	\$213.00		4/30/26
803510504	4/6/26	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		4/30/26
803521460	4/14/26	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		4/30/26
803548172	5/5/26	CV-CCS:290	02668	Contract/Document Preparation	2.50	\$213.00	\$532.50		
803554398	5/11/26	CV-CCS:290	02668	Case Management	0.50	\$213.00	\$106.50		
Helen Koh Totals:					4.75		\$1,011.75		
2025 Totals:					4.75		\$1,011.75		
Paralegal Totals:					4.75		\$1,011.75		
LA2026800993 Totals:					10.00		\$2,208.75		

Exhibit 5

Investigative Report (without attachments) (DCC25-0001665-INV)

INVESTIGATION REPORT



Department of Cannabis Control CALIFORNIA



CASE INFORMATION

Table with 2 columns: Case Number, Date Received, License Number, Legal Business Name, DBA, Premises Address, Business Phone Number, Author's Name, Date of Incident, Location of Incident.

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

Table with 2 columns: Name, Title, Address, E-mail Address, Phone Number, Miscellaneous Information.

SUMMARY

On August 6, 2025, at approximately 0930 hours, I, Department of Cannabis Control (Department) Special Investigator (SI) Matthew McLean along with Department Supervising Special Investigator I (SSI I) Travis White (White) arrived at the licensed premises of LA Green Rush LLC (LA Green Rush).

I was not granted access for purposes of performing an inspection of the LA Green Rush licensed premises. I issued a Notice to Comply on August 6, 2025, requiring that the licensee provide access for an inspection.

On March 4, 2026, I was granted access to the licensed premises by an employee of JMAZ Lighting who told me that JMAZ Lighting had occupied the licensed premises for approximately eight months.

BACKGROUND

- C11-0000658-LIC – Annual license expires July 2, 2026
DCC-10004270 – Annual License expires July 21, 2026
C9-0000249-LIC – Annual license expired August 8, 2025

DCC-010 (02/2023)



INVESTIGATION REPORT

CASE NARRATIVE

On August 6, 2025, at approximately 0930 hours, SSI I White and I arrived at the licensed premises of LA Green Rush for its distributor license C11-0000658-LIC, manufacturer license DCC-10004270, and non-storefront retailer license C9-0000249-LIC all located at 1412 South Gerhart Avenue, Commerce, CA 90022.

Upon our arrival at the licensed premises, we parked our vehicle in front of the licensed premises, and I searched the California Cannabis Track and Trace (CCTT) system for the current cannabis inventories for the LA Green Rush licensed distributor (**Attachment A**), manufacturer (**Attachment B**), and non-storefront retailer premises (**Attachment C**). I discovered that the inventory reports recorded the following approximate inventories for the three LA Green Rush licenses:

Distributor	
Packaged Cannabis Edibles	7,529 Units
Packaged Cannabis Extracts	3,523 Units
Bulk Cannabis Flower, Shake, and Trim	45,767 LBS
Packaged Cannabis Flower and Shake	1,865 Units
Packaged Cannabis Pre-rolls	17,289 Units
Packaged Cannabis Vape Cartridges	3,347 Units

Manufacturer	
Bulk Cannabis Extract	29.3 Liters
Bulk Cannabis Extract	74,547 Units
Bulk Cannabis Distillate	39,784 Grams
Bulk Cannabis Flower	19 LBS
Bulk Cannabis Kief	200 Grams
Bulk Cannabis Concentrate	4,003 Grams

Non-storefront Retailer	
Packaged Cannabis Edibles	540 Units
Packaged Cannabis Edibles	69 Units
Packaged Cannabis Flower	2,766 Units
Packaged Cannabis Concentrates	50 Units
Packaged Cannabis Pre-rolls	477 Units
Packaged Cannabis Tinctures	19 Units
Packaged Cannabis Vape Cartridges	241 Units

At approximately 0947 hours, I knocked on the front door and the roll-up door at the front of the licensed premises. I knocked on each door several times and received no response.

At approximately 1012 hours, I attempted to contact LA Green Rush Owner and Designated Responsible Party Daniel Shon (Shon) at (714) 876-5013 which was the number listed for Shon in the Department licensing database (**Attachment D**). Shon was the sole listed contact for LA Green Rush's licenses (Gabriella Barnes was added as an owner on August 12, 2025). Shon did not answer my phone call, and I left a voicemail message identifying myself, and explaining that I was outside the LA Green Rush licensed premises to perform an inspection and requesting a call back as soon as possible to provide access for the inspection.

At approximately 1027 hours, I sent an email to Shon at lytfounders@gmail.com and lagreenrushllc@gmail.com which were the email addresses listed for Shon and LA Green Rush in the Department licensing database. The email had an attached Notice to Comply (**Attachment E**) which required LA Green Rush to provide the following no later than August 6, 2025, at 1700 hours:



INVESTIGATION REPORT

- Provide access to the licensed premises for purposes of a Department inspection.
- Provide all inbound and outbound transfer invoices from July 1, 2025, to August 6, 2025.
- Provide continuous video surveillance footage from all interior and exterior cameras at the licensed premises from August 1, 2025, to August 6, 2025.

At approximately 1035 hours SSI I White and I departed the area of the LA Green Rush licensed premises.

On September 4, 2025, at approximately 1026 hours I used the CCTT system to search the transfers which had been scheduled to arrive at the LA Green Rush licensed premises on August 6, 2025 (**Attachment F**). I discovered that there had been 62 transfers scheduled to arrive at the three Green Rush licenses on August 6, 2025. The earliest transfer was scheduled to arrive at 0730 hours that day and three transfers were scheduled to arrive before the time that SSI I White and I departed the licensed premises.

That same day I further searched the CCTT system and discovered that since my attempted inspection of the LA Green Rush licensed premises on August 6, 2025, there had been approximately 1,588 transfers scheduled to arrive at LA Green Rush's three licensed premises with a total of approximately 12,582 packages of cannabis and cannabis goods transferred. Of those transfers, 1,324 transfers were accepted by LA Green Rush (**Attachment G**). 1,516 of the transfers were sent to the LA Green Rush distributor license, 71 were sent to the LA Green Rush manufacturer license, and 1 was sent to the LA Green Rush non-storefront retailer license.

On March 4, 2026, at approximately 1115 hours, SSI I White and I arrived at the LA Green Rush licensed premises to perform an unannounced inspection. I knocked on the front door of the licensed premises and an individual answered the door who identified himself as Ishamel. I identified myself using my Department issued credentials and informed Ishamel that I was there to inspect LA Green Rush. Ishmael informed me that the licensed premises contained a video and lighting business called JMAZ Lighting and did not contain any cannabis. Ishamel allowed us to enter and during my inspection I discovered that the licensed premises did not contain any cannabis (**Attachment H**).

Ishamel told me that JMAZ Lighting had purchased and occupied the licensed premises for approximately eight months. Ishamel told me I could speak with the owner of JMAZ Lighting, Jason He, if I had any further questions.

At approximately 1130 hours, we departed the licensed premises.

On March 20, 2026, at approximately 1418 hours, I called the owner of JMAZ Lighting, Jason He, at the business phone number listed on the JMAZ Lighting website, detailed as (626) 380-0883 (**Attachment I**). He confirmed that eight months prior, JMAZ Lighting had begun occupying the building at 1412 South Gerhart Avenue, Commerce, CA 90022. He agreed to provide me documentation which would show the date that JMAZ Lighting took over the space.

On March 24, 2026, I searched the CCTT database for the current cannabis inventories of the LA Green Rush distributor (**Attachment J**) and manufacturer (**Attachment K**) licenses. I discovered that LA Green Rush had recorded 83,778 packages of cannabis and cannabis products in their inventory (A cannabis package may contain thousands of individual cannabis products or pounds of bulk cannabis or cannabis concentrates) . Those packages consisted of the following approximate cannabis inventories for its distributor and manufacturer licenses:

Distributor	
Packaged Cannabis Capsules	1,925 Units
Cannabis Clone Cuttings, Tissue Samples and Immature Plants	26,171 Units
Packaged Cannabis Edibles	221,998 Units
Packaged Cannabis Concentrates	197,033 Units
Bulk Cannabis Flower, Shake and Leaf	625,850 Pounds
Packaged Cannabis Flower	252,654 Units



INVESTIGATION REPORT

Packaged Cannabis Pre-rolls	841,779 Units
Packaged Cannabis Vape Cartridges	832,862 Units

Manufacturer	
Packaged Cannabis Edibles	11,294 Units
Packaged Cannabis Concentrates	1,024,063 Units
Bulk Cannabis Concentrate by Volume	102.1 Liters
Bulk Cannabis Concentrate by Weight	30,835.3 Pounds
Bulk Cannabis Flower, Plant, Leaf, and Shake	59,887.3 Pounds
Packaged Cannabis Flower	218 Units
Bulk Cannabis Kief	30.1 Pounds
Packaged Cannabis Pre-rolls	34,051 Units
Packaged Cannabis Vape Cartridges	15,464 Units

Of the 83,778 cannabis packages recorded in the inventory for the LA Green Rush manufacturer and distributor licenses, 51,693 packages had never been submitted for regulatory compliance testing.

On March 25, 2026, I searched the CCTT database for all recorded transfers of cannabis and cannabis products into the LA Green Rush accounts from March 4, 2026 to March 25, 2026 (**Attachment L**). I discovered that during that period there were 1,261 separate transfers recorded as being sent to the LA Green Rush licensed premises. Of those transfers, 974 had been accepted by LA Green Rush.

As of March 25, 2026, I have not received a response from anyone associated with the LA Green Rush licenses regarding the Notice to Comply I issued on August 6, 2025.

LA Green Rush has received a large amount of cannabis and cannabis products which are not physically located in the licensed premises. Additionally, LA Green Rush has not cooperated with the investigation by granting access for an inspection of the licensed premises or responding to the Notice to Comply issued on August 6, 2025. From my training and experience this activity is consistent with a licensee that is engaged in cannabis diversion.

As of April 2, 2026, I have not received any documentation from He related to when JMAZ Lighting began to occupy the LA Green Rush licensed premises.

WITNESS LIST

Witness #1

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

Witness #2

- 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: Assisted with investigation



INVESTIGATION REPORT

Witness #3

- Name: Jason He
- Title/Position: Owner – JMAZ Lighting
- Address: 2422 Lee Avenue, South El Monte, CA 91733
- Phone: (626) 380-0883
- E-mail: jason@jmazlighting.com
- Miscellaneous information: Provided information for investigation

PREPARER	
Name Matthew McLean	Title Special Investigator
Signature McLean, Matthew@Cannabis	Date Digitally signed by McLean, Matthew@Cannabis Date: 2026.04.02 10:21:27 -07'00'

REVIEWER	
Name Travis White	Title Supervising Special Investigator I
Signature	Date

LIST OF ATTACHMENTS

- Attachment A - LA Green Rush Distribution Inventory
- Attachment B - LA Green Rush Non-storefront Retail Inventory
- Attachment C - LA Green Rush Manufacturing Inventory
- Attachment D - Contact Information
- Attachment E - LA Green Rush NTC and Email
- Attachment F - Incoming transfers scheduled for 8.6.2025
- Attachment G - Incoming transfers scheduled from 8.6.25 to 9.4.25
- Attachment H - Photos of licensed premises
- Attachment I - JMAZ Lighting webpage
- Attachment J - Distribution Inventory 3.24.2026
- Attachment K - Manufacturing Inventory 3.24.2026
- Attachment L - Transfers to LA Green Rush for 3.4.2026 to 3.25.2026

PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: LA Green Rush LLC
DCC Case No. DCC25-0001665-INV
License Nos. C11-0000658-LIC, Distributor; DCC-10004270, Manufacturer-Type P

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 May 21, 2026, 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.

LA Green Rush LLC
Daniel Shon, DRP/Owner
700 Flower St., Ste. 29
Los Angeles, CA 90017
Certified Mail No. 7022 1670 0001 3411 8108
lytfounders@gmail.com
lagreenrushllc@gmail.com

Gabriella S. Barnes, Owner
LA Green Rush LLC
1412 S Gerhart Ave.
Commerce, CA 90022
Certified Mail No. 7022 1670 0001 3411 8139
gabysylvia@yahoo.com

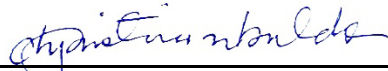
Evelyn Schaeffer (email only)
Deputy Director
Compliance Division
Department of Cannabis Control
Evelyn.Schaeffer@cannabis.ca.gov

Harinder K. Kapur (email only)
Senior Assistant Attorney General
Cannabis Control Section
Office of 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 May 21, 2026, at Rancho Cordova, California.



Christina C. Ubaldo