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

11 In the Matter of the Accusation Against:

12 **COMMERCE ON DEMAND LLC, DBA**
13 **GOOD TREE;**
14 **RASHAAN M. EVERETT, OWNER**
15 **7121 Telegraph Road**
16 **Montebello, CA 90640**

17 **Retailer Non-Storefront License**
18 **No. C9-0000385-LIC**

19 Respondent.

Case No. DCC24-0000091-INV

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

20 **FINDINGS OF FACT**

21 1. On or about December 27, 2024, Complainant Evelyn Schaeffer, in her official
22 capacity as the Deputy Director of the Compliance Division of the Department of Cannabis
23 Control, filed Accusation No. DCC24-0000091-INV against Commerce on Demand LLC dba
24 Good Tree (Respondent) with Rashaan M. Everett as Owner (Owner) before the Department of
Cannabis Control. (Accusation attached as Exhibit A.)

25 2. On or about November 9, 2020, the Department of Cannabis Control (Department)
26 issued Retailer Non-Storefront License No. C9-0000385-LIC to Respondent. The Retailer Non-
27 Storefront License was in full force and effect at all times relevant to the charges brought in
28 Accusation No. DCC24-0000091-INV and expired on November 9, 2024. The Retailer Non-

1 Storefront License has not been renewed. This lapse in licensure, however, pursuant to Business
2 and Professions Code section 26031, subdivision (d), does not deprive the Department of its
3 authority to institute or continue this disciplinary proceeding.

4 3. On or about January 3, 2025, Respondent was served by Certified and First Class
5 Mail copies of the Accusation No. DCC24-0000091-INV, Statement to Respondent, Notice of
6 Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5,
7 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of
8 Regulations, title 4, section 15002, is required to be reported and maintained with the
9 Department. Respondent's address of record was and is: 7121 Telegraph Road, Montebello, CA
10 90640.

11 4. On or about January 3, 2025, Respondent's Owner was served by Certified and First
12 Class Mail, and email, copies of the Accusation No. DCC24-0000091-INV, Statement to
13 Respondent, Notice of Defense, Request for Discovery and Discovery Statutes (Government
14 Code sections 11507.5, 11507.6, and 11507.7) at a second address on file with the Department,
15 which was and is: 17318 DeGroot Place, Cerritos, CA 90703.

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

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

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

24 7. The Department takes official notice of its records and the fact that Respondent failed
25 to file a Notice of Defense within 15 days after service upon them of the Accusation, and
26 therefore waived its right to a hearing on the merits of Accusation No. DCC24-0000091-INV.

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

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

9. Given the above-mentioned facts and 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 matter, finds that the charges and allegations in Accusation No. DCC24-0000091-INV, are separately and severally, found to be true and correct by a preponderance of the evidence.

10. The Department finds that the actual costs for Enforcement are \$5,741.25 as of March 7, 2025.

DETERMINATION OF ISSUES

11. Based on the foregoing findings of fact, Respondent Commerce on Demand LLC, dba Good Tree has subjected its Retailer Non-Storefront License No. C9-0000385-LIC to discipline.

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

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

- a. Violation of California Code of Regulations, title 4, section 17800, subdivisions (a)-(b); [Failure to Provide Access to the Licensed Premises.]
- b. Violation of Business and Professions Code section 26051.5, subdivision (a) and California Code of Regulations, title 4, section 15002, subdivision (c)(20); [Failure to Provide a Valid Seller's Permit.]
- c. Violation of California Code of Regulations, title 4, section 15044, subdivisions (b) and (f); [Failure to Maintain a Functional Video Surveillance System).]

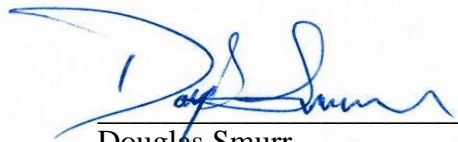
ORDER

IT IS SO ORDERED that Retailer Non-Storefront License No. C9-0000385-LIC, issued to Respondent Commerce on Demand LLC, dba Good Tree, with Rashaan M. Everett as Owner, is revoked.

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

6
7 This Decision shall become effective on April 10, 2025.

8
9 IT IS SO ORDERED, March 11, 2025.

10
11 
12 _____
13 Douglas Smurr
14 Assistant General Counsel
15 FOR THE DEPARTMENT OF
16 CANNABIS CONTROL
17
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20

21 Attachment:
22 Exhibit A: Default Decision Exhibit Packet
23
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25
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27
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Exhibit A

Accusation

1 ROB BONTA
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Harinder.kapur@doj.ca.gov
6 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC24-0000091

12 **COMMERCE ON DEMAND LLC,**
13 **DbA GOOD TREE**
14 **Rashaan Everett, Owner**
15 **7121 Telegraph Road**
16 **Montebello, CA 90640**

ACCUSATION

17 **License Number C9-0000385-LIC**

Respondent.

18
19 **PARTIES**

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

23 2. On or about November 9, 2020, the Department issued Adult-Use and
24 Medicinal Retailer - Non-Storefront License Number C9-0000385-LIC to Commerce on
25 Demand LLC, dba Good Tree (Respondent) with Rashaan Everett as Owner. The Adult-
26 Use and Medicinal Retailer - Non-Storefront License was in full force and effect at all
27 times relevant to the charges brought herein and will expire on November 9, 2024, unless
28 renewed.

JURISDICTION

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

4. Section 26010 of the Code states:

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

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

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

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

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

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

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

8. Section 26015, subdivision (a), of the Code states:

(a) The department may make or cause to be made such investigation as it deems necessary to carry out its duties under this division.

9. Section 26031 of the Code states, in part:

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

1 ...

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

6 ...

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

15 10. Section 26034 of the Code states:

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

24 **STATUTORY PROVISIONS**

25 11. Section 26030 of the Code states:

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

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

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

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

(d) Failure to comply with any state law including, but not limited to,
the payment of taxes as required under the Revenue and Taxation Code,
except as provided for in this division or other California law....

12. Section 26051.5 of the Code states:

(a) An applicant for a state license issued pursuant to this division to
conduct commercial cannabis activity, as defined in Section 26001, shall do all
of the following:

...

(6) Provide the applicant's valid seller's permit number issued pursuant to Part 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation Code or indicate that the applicant is currently applying for a seller's permit....

13. Section 26057 of the Code states:

(a) The department shall deny an application if either the applicant, or the premises for which a state license is applied, do not qualify for licensure under this division.

(b) The department may deny the application for licensure or renewal of a state license if any of the following conditions apply:

...

(8) Failure to obtain and maintain a valid seller's permit required pursuant to Part 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation Code....

14. Section 26160 of the Code states, in pertinent part(s):

...

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

...

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

15. Revenue and Taxation Code section 34014, subdivision (a)(2), states:

(a)(2) On and after January 1, 2023, all cannabis retailers shall obtain a separate cannabis tax permit from the department pursuant to regulations adopted by the department. A fee shall not be charged to any person for issuance of the permit. Any person required to obtain a permit who engages in business as a cannabis retailer without a permit or after a permit has been canceled, suspended, or revoked, and each officer of any corporation that so engages in business, is guilty of a misdemeanor.

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1 **REGULATORY PROVISIONS**

2 16. Title 4 of the California Code of Regulations, section 15000.5 states:

3 In construing and enforcing the provisions of the Act and the regulations
4 in this division, the act, omission, or failure of an agent, officer,
5 representative, or other person acting for or employed by a licensee, within the
scope of their employment or office, shall in every case be deemed the act,
omission, or failure of the licensee.

6 17. Title 4 of the California Code of Regulations, section 15002, states:

7 ...

8 (c) An application must be completed by an owner as defined by section
9 15003. An application for an annual cannabis license includes the following:

10

11 (20) The applicant shall provide a valid seller's permit number issued by
the California Department of Tax and Fee Administration, if applicable. If the
12 commercial cannabis business has not yet received a seller's permit, the
commercial cannabis business shall attest that the commercial cannabis
13 business is currently applying for a seller's permit....

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

16 ...

17 (b) The video surveillance system shall at all times be able to effectively
and clearly record images of the area under surveillance.

18 ...

19 (f) Cameras shall record continuously 24 hours per day....

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

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

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

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

26 (3) Test any cannabis goods or cannabis-related materials or products
27 possessed by, in control of, or used by a licensee or their agents and
employees for the purpose of conducting commercial cannabis activity.
28

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

3 (b) Failure to cooperate with and participate in any Department
4 investigation pending against the licensee may result in a licensing violation
5 subject to discipline. This subsection shall not be construed to deprive a
6 licensee of any privilege guaranteed by the Fifth Amendment to the
7 Constitution of the United States, or any other constitutional or statutory
8 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....

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

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

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

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

17 (d) The licensee shall sign and return the Notice to Comply and describe
18 how compliance was achieved within 30 calendar days after the date of
19 personal service or 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.

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

22 21. Title 4 of the California Code of Regulations, section 17809 states:

23 (a) When an accusation recommending disciplinary action against a
24 licensee has been filed pursuant to Business and Professions Code section
25 26031, the accusation shall be served on the licensee in accordance with
Government Code section 11505.

26 (b) A hearing shall be conducted in accordance with the provisions of
27 chapter 5 (commencing with section 11500) of part 1 of division 3 of title 2 of
28 the Government Code to determine if cause exists to take action against the
licensee. At the hearing, the Department shall have all of the powers granted
by the statutes cited above and by the Business and Professions Code.

(c) If a hearing on an accusation against a licensee results in a finding that the licensee has committed any of the acts or omissions constituting grounds for disciplinary action, the Department may order the license revoked, suspended outright for a specified period of time, or suspended on probationary restriction for a specified period of time, including terms and conditions of probation the Department considers appropriate on the basis of its findings, impose a fine, or any combination thereof. The Department may also issue other lawful orders it considers appropriate on the basis of its findings.

COST RECOVERY

22. Section 26031.1 of the Code states that:

(a) Except as otherwise provided by law, in an order issued in resolution of a disciplinary proceeding before the department, the administrative law judge, upon 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.

(b) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the department or its designated 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.

(c) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to 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).

(d) If an order for recovery of costs is made and timely payment is not made as directed in the department's decision, the department may enforce the order for 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.

(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.

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

(2) Notwithstanding paragraph (1), the department may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any 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.

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

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

5 **FACTUAL ALLEGATIONS**

6 23. On or about February 15, 2024, a Department staff member emailed a Letter
7 of Warning (letter) to Respondent's email address of record, wherein Respondent was
8 warned that the Department had evidence of Respondent's noncompliance with state law
9 requiring Respondent to have a valid seller's permit in order to engage in commercial
10 cannabis activity issued by the California Department of Tax and Fee administration
11 (CDTFA). Per the Department's letter, the CDTFA had previously revoked Respondent's
12 seller's permit on or about October 24, 2022. The Department's letter to Respondent
13 further advised Respondent that the Department may also take disciplinary action against
14 Respondent, leading up to, and including, revocation of its license(s). In the Department's
15 letter, Respondent was instructed to immediately provide the Department with a valid
16 seller's permit number issued by the CDTFA. The Department did not receive a valid
17 seller's permit following the Department's February 15, 2024, warning letter.

18 24. On April 24, 2024, Department staff confirmed with a CDTFA representative
19 that Respondent did not possess a valid seller's permit and was not permitted to make
20 commercial cannabis sales in California. Accordingly, Department investigators visited
21 Respondent's licensed premises on April 24, 2024, during normal business hours for a
22 regulatory compliance inspection. Despite their efforts, including knocking on the front
23 door, announcing their presence, emailing, and calling the registered owner of
24 Respondent's business, Rashaan Everett (Everett), the Department's investigators were
25 unable to contact anyone at the licensed premises. Department investigators also noticed
26 that the outdoor surveillance cameras were disconnected and removed, exposing the
27 camera's connection wires. After waiting approximately 45 minutes, the Department
28

1 investigators left the premises without making contact with Everett, or any employees of
2 Respondent.

3 25. On May 7, 2024, a Department investigator emailed Respondent a notice of
4 inspection scheduled for the following morning (May 8, 2024). In the email, Respondent
5 was warned that failure to make the premises available for inspection may result in a
6 violation with a maximum fine of \$5,000 per violation, and that each day Respondent
7 failed to provide access would constitute a new violation per day denied. No response
8 was received from Respondent. Department investigators visited the licensed premises on
9 May 8, 2024, to again inspect the licensed premises. As was the case on April 24, 2024,
10 Department investigators were unable to contact anyone at the licensed premises despite
11 knocking on the front door, announcing their presence, calling, and leaving a voicemail
12 for Everett. Department investigators also noted again that the outdoor surveillance
13 cameras remained disconnected and connection wires still exposed. After waiting
14 approximately 45 minutes, Department investigators left the premises without making
15 contact with Everett, or any employees of Respondent.

16 26. On May 24, 2024, a Notice to Comply (Notice) was emailed to Respondent's
17 email address of record, wherein Respondent was given ten calendar days, or until June 3,
18 2024, to submit a valid seller's permit number to the Department. The Notice advised
19 Respondent that failure to correct the listed violation may result in disciplinary action.

20 27. On May 25, 2024, Everett emailed a Department staff member and requested
21 to surrender Respondent's cannabis licenses, including its Retailer - Non-Storefront
22 License Number C9-0000385-LIC. On May 28, 2024, a representative from the
23 Department's Compliance Division replied to Everett's request and instructed him to
24 email the Department's Licensing Division for instructions on how to surrender
25 Respondent's licenses. Everett was advised that he must submit a copy of his email
26 correspondence (with the Licensing Division), to the Compliance Division, by June 3,
27 2024, or disciplinary action may occur. Everett sent an email to the Licensing Division on
28 May 28, 2024, and later that day, a representative from the Department's Licensing

1 Division redirected and instructed Everett to submit a written surrender request via e-mail
2 to the Licensing Actions Unit. On June 13, 2024, the Department's Licensing Actions
3 Unit confirmed that there were no emails sent by Respondent/Everett to its designated e-
4 mail account.

5 **FIRST CAUSE FOR DISCIPLINE**

6 (Failure to Provide Access to the Licensed Premises)

7 28. Respondent is subject to disciplinary action under Code section 26030,
8 subdivisions (a) and (c), in that it failed to comply with Code section 26160, subdivision
9 (e), and Title 4 of the California Code of Regulations, section 17800, subdivisions (a)-(b),
10 requiring a licensee to comply with the Department's request for inspection of its licensed
11 premises as is more particularly alleged in paragraphs 24 through 25, above, which are
12 hereby incorporated by reference and realleged as if fully set forth herein.

13 **SECOND CAUSE FOR DISCIPLINE**

14 (Failure to Provide a Valid Seller's Permit)

15 29. Respondent is subject to disciplinary action under Code sections 26030,
16 subdivision (a), in that it failed to comply with Code section 26051.5, subdivision (a) and
17 Title 4 of the California Code of Regulations, section 15002, subdivision (c)(20),
18 requiring a valid seller's permit issued by the CDTFA to engage in commercial cannabis
19 activity as is more particularly alleged in paragraphs 23 through 27, above, which are
20 hereby incorporated by reference and realleged as if fully set forth herein.

21 **THIRD CAUSE FOR DISCIPLINE**

22 (Failure to Maintain a Functional Video Surveillance System)

23 30. Respondent is subject to disciplinary action under Code section 26030,
24 subdivisions (a) and (c), in that it failed to comply with the provisions of Title 4 of the
25 California Code of Regulations, section 15044, subdivisions (b) and (f), requiring 24-hour
26 video surveillance at the licensed premises as is more particularly alleged in paragraphs 24
27 through 25, above, which are hereby incorporated by reference and realleged as if fully set
28 forth herein.

PRAYER

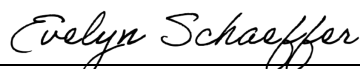
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director issue a decision:

1. Revoking the Adult-Use and Medicinal Retailer - Non-Storefront License Number C9-0000385-LIC issued to Commerce on Demand LLC, dba Good Tree (Respondent) with Rashaan Everett as Owner;

2. Ordering Respondent Commerce on Demand LLC, dba Good Tree (Respondent) with Rashaan Everett as Owner, to pay the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1; and

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

DATED: December 27, 2024



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

Exhibit B

Default Decision Investigatory Packet

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

In the Matter of the Accusation Against:

**COMMERCE ON DEMAND LLC, DBA
GOOD TREE;
RASHAAN M. EVERETT, OWNER
7121 Telegraph Road
Montebello, CA 90640**

**Retailer Non-Storefront License
No. C9-0000385-LIC**

Respondent.

Case No. DCC24-0000091-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. DCC24-0000091-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), and Proof of Service;

Exhibit 2: License Certification for Commerce on Demand LLC dba Good Tree; Rashaan M. Everett, Owner. Retailer Non-Storefront License No. C9-0000385-LIC;

Exhibit 3: Certification of Costs by the Office of the Attorney General for Enforcement in Case No. DCC24-0000091-INV dated March 7, 2025; and

Exhibit 4: Investigation Report with Attached Exhibits.

Dated: March 7, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California



HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

Exhibit 1

Accusation No. DCC24-0000091-INV

Statement to Respondent

Notice of Defense

Request for Discovery

Discovery Statutes, Proof of Service

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7 *Attorneys for Complainant*

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

10
11 In the Matter of the Accusation Against:

Case No. DCC24-0000091

12 **COMMERCE ON DEMAND LLC DBA**
13 **GOOD TREE; RASHAAN M. EVERETT,**
DRP

STATEMENT TO RESPONDENT

[Gov. Code §§ 11504, 11505(b)]

14 Respondent.

15
16 TO RESPONDENT:

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

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

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

28 ///

1 **Harinder K. Kapur**
2 **Senior Assistant Attorney General**
3 **600 West Broadway, Suite 1800**
4 **San Diego, CA 92101**
5 **P.O. Box 85266**
6 **San Diego, CA 92186-5266**

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

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

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

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

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

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

23 **NOTICE REGARDING STIPULATED SETTLEMENTS**

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

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

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

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

6 Dated: January 2, 2025

ROB BONTA
Attorney General of California

Harinder Kapur

HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

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1 ROB BONTA
Attorney General of California
2 HARINDER K. KAPUR
Senior Assistant Attorney General
3 State Bar No. 198769
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5 Telephone: (619) 738-9407
Harinder.kapur@doj.ca.gov
6 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC24-0000091

12 **COMMERCE ON DEMAND LLC,**
13 **DbA GOOD TREE**
14 **Rashaan Everett, Owner**
15 **7121 Telegraph Road**
16 **Montebello, CA 90640**

ACCUSATION

17 **License Number C9-0000385-LIC**

Respondent.

18
19 **PARTIES**

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

23 2. On or about November 9, 2020, the Department issued Adult-Use and
24 Medicinal Retailer - Non-Storefront License Number C9-0000385-LIC to Commerce on
25 Demand LLC, dba Good Tree (Respondent) with Rashaan Everett as Owner. The Adult-
26 Use and Medicinal Retailer - Non-Storefront License was in full force and effect at all
27 times relevant to the charges brought herein and will expire on November 9, 2024, unless
28 renewed.

JURISDICTION

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

4. Section 26010 of the Code states:

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

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

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

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

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

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

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

8. Section 26015, subdivision (a), of the Code states:

(a) The department may make or cause to be made such investigation as it deems necessary to carry out its duties under this division.

9. Section 26031 of the Code states, in part:

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

1 ...
2 (c) The department may take disciplinary action against a licensee for
3 any violation of this division when the violation was committed by the
4 licensee's officers, directors, owners, agents, or employees while acting on
5 behalf of the licensee or engaged in commercial cannabis activity

6 ...
7 (d) The suspension or expiration of a license issued by the department,
8 or its suspension, forfeiture, or cancellation by order of the department or by
9 order of a court of law, or its surrender without the written consent of the
10 department, shall not, during any period in which it may be renewed, restored,
11 reissued, or reinstated, deprive the department of its authority to institute or
12 continue a disciplinary proceeding against the licensee upon any ground
13 provided by law or to enter an order suspending or revoking the license or
14 otherwise taking disciplinary action against the licensee on any such ground.

15 10. Section 26034 of the Code states:

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

24 STATUTORY PROVISIONS

25 11. Section 26030 of the Code states:

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

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

29 ...
30 (c) Any other grounds contained in regulations adopted by the
department pursuant to this division.

31 (d) Failure to comply with any state law including, but not limited to,
32 the payment of taxes as required under the Revenue and Taxation Code,
33 except as provided for in this division or other California law....

34 12. Section 26051.5 of the Code states:

35 (a) An applicant for a state license issued pursuant to this division to
36 conduct commercial cannabis activity, as defined in Section 26001, shall do all
37 of the following:

1 ...
2 (6) Provide the applicant's valid seller's permit number issued pursuant
3 to Part 1 (commencing with Section 6001) of Division 2 of the Revenue and
4 Taxation Code or indicate that the applicant is currently applying for a seller's
5 permit....

6
7 13. Section 26057 of the Code states:

8 (a) The department shall deny an application if either the applicant, or the
9 premises for which a state license is applied, do not qualify for licensure under this
10 division.

11 (b) The department may deny the application for licensure or renewal of a
12 state license if any of the following conditions apply:

13 ...
14 (8) Failure to obtain and maintain a valid seller's permit required pursuant to
15 Part 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation
16 Code....

17 14. Section 26160 of the Code states, in pertinent part(s):

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

25 ...
26 (e) A licensee, or its agent or employee, that refuses, impedes, obstructs,
27 or interferes with an inspection of the premises or records of the licensee
28 pursuant to this section, has engaged in a violation of this division....

15. Revenue and Taxation Code section 34014, subdivision (a)(2), states:

(a)(2) On and after January 1, 2023, all cannabis retailers shall obtain a
separate cannabis tax permit from the department pursuant to regulations
adopted by the department. A fee shall not be charged to any person for
issuance of the permit. Any person required to obtain a permit who engages in
business as a cannabis retailer without a permit or after a permit has been
canceled, suspended, or revoked, and each officer of any corporation that so
engages in business, is guilty of a misdemeanor.

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REGULATORY PROVISIONS

16. Title 4 of the California Code of Regulations, section 15000.5 states:

In construing and enforcing the provisions of the Act and the regulations in this division, the act, omission, or failure of an agent, officer, representative, or other person acting for or employed by a licensee, within the scope of their employment or office, shall in every case be deemed the act, omission, or failure of the licensee.

17. Title 4 of the California Code of Regulations, section 15002, states:

...

(c) An application must be completed by an owner as defined by section 15003. An application for an annual cannabis license includes the following:

....

(20) The applicant shall provide a valid seller's permit number issued by the California Department of Tax and Fee Administration, if applicable. If the commercial cannabis business has not yet received a seller's permit, the commercial cannabis business shall attest that the commercial cannabis business is currently applying for a seller's permit....

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

...

(b) The video surveillance system shall at all times be able to effectively and clearly record images of the area under surveillance.

...

(f) Cameras shall record continuously 24 hours per day....

19. Title 4 of the California Code of Regulations, section 17800, states, in pertinent part:

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

(1) Enter any premises licensed by the Department.

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

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

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

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

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

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

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

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

26 (d) The licensee shall sign and return the Notice to Comply and describe
27 how compliance was achieved within 30 calendar days after the date of
28 personal service or 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.

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

21 21. Title 4 of the California Code of Regulations, section 17809 states:

22 (a) When an accusation recommending disciplinary action against a
23 licensee has been filed pursuant to Business and Professions Code section
24 26031, the accusation shall be served on the licensee in accordance with
25 Government Code section 11505.

26 (b) A hearing shall be conducted in accordance with the provisions of
27 chapter 5 (commencing with section 11500) of part 1 of division 3 of title 2 of
28 the Government Code to determine if cause exists to take action against the
licensee. At the hearing, the Department shall have all of the powers granted
by the statutes cited above and by the Business and Professions Code.

1 (c) If a hearing on an accusation against a licensee results in a finding
2 that the licensee has committed any of the acts or omissions constituting
3 grounds for disciplinary action, the Department may order the license
4 revoked, suspended outright for a specified period of time, or suspended on
5 probationary restriction for a specified period of time, including terms and
6 conditions of probation the Department considers appropriate on the basis of
7 its findings, impose a fine, or any combination thereof.
8 The Department may also issue other lawful orders it considers appropriate on
9 the basis of its findings.

6 **COST RECOVERY**

7 22. Section 26031.1 of the Code states that:

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

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

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

26 (d) If an order for recovery of costs is made and timely payment is not
27 made as directed in the department's decision, the department may enforce the
28 order for 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.

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

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

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

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

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

5 **FACTUAL ALLEGATIONS**

6 23. On or about February 15, 2024, a Department staff member emailed a Letter
7 of Warning (letter) to Respondent's email address of record, wherein Respondent was
8 warned that the Department had evidence of Respondent's noncompliance with state law
9 requiring Respondent to have a valid seller's permit in order to engage in commercial
10 cannabis activity issued by the California Department of Tax and Fee administration
11 (CDTFA). Per the Department's letter, the CDTFA had previously revoked Respondent's
12 seller's permit on or about October 24, 2022. The Department's letter to Respondent
13 further advised Respondent that the Department may also take disciplinary action against
14 Respondent, leading up to, and including, revocation of its license(s). In the Department's
15 letter, Respondent was instructed to immediately provide the Department with a valid
16 seller's permit number issued by the CDTFA. The Department did not receive a valid
17 seller's permit following the Department's February 15, 2024, warning letter.

18 24. On April 24, 2024, Department staff confirmed with a CDTFA representative
19 that Respondent did not possess a valid seller's permit and was not permitted to make
20 commercial cannabis sales in California. Accordingly, Department investigators visited
21 Respondent's licensed premises on April 24, 2024, during normal business hours for a
22 regulatory compliance inspection. Despite their efforts, including knocking on the front
23 door, announcing their presence, emailing, and calling the registered owner of
24 Respondent's business, Rashaan Everett (Everett), the Department's investigators were
25 unable to contact anyone at the licensed premises. Department investigators also noticed
26 that the outdoor surveillance cameras were disconnected and removed, exposing the
27 camera's connection wires. After waiting approximately 45 minutes, the Department
28

1 investigators left the premises without making contact with Everett, or any employees of
2 Respondent.

3 25. On May 7, 2024, a Department investigator emailed Respondent a notice of
4 inspection scheduled for the following morning (May 8, 2024). In the email, Respondent
5 was warned that failure to make the premises available for inspection may result in a
6 violation with a maximum fine of \$5,000 per violation, and that each day Respondent
7 failed to provide access would constitute a new violation per day denied. No response
8 was received from Respondent. Department investigators visited the licensed premises on
9 May 8, 2024, to again inspect the licensed premises. As was the case on April 24, 2024,
10 Department investigators were unable to contact anyone at the licensed premises despite
11 knocking on the front door, announcing their presence, calling, and leaving a voicemail
12 for Everett. Department investigators also noted again that the outdoor surveillance
13 cameras remained disconnected and connection wires still exposed. After waiting
14 approximately 45 minutes, Department investigators left the premises without making
15 contact with Everett, or any employees of Respondent.

16 26. On May 24, 2024, a Notice to Comply (Notice) was emailed to Respondent's
17 email address of record, wherein Respondent was given ten calendar days, or until June 3,
18 2024, to submit a valid seller's permit number to the Department. The Notice advised
19 Respondent that failure to correct the listed violation may result in disciplinary action.

20 27. On May 25, 2024, Everett emailed a Department staff member and requested
21 to surrender Respondent's cannabis licenses, including its Retailer - Non-Storefront
22 License Number C9-0000385-LIC. On May 28, 2024, a representative from the
23 Department's Compliance Division replied to Everett's request and instructed him to
24 email the Department's Licensing Division for instructions on how to surrender
25 Respondent's licenses. Everett was advised that he must submit a copy of his email
26 correspondence (with the Licensing Division), to the Compliance Division, by June 3,
27 2024, or disciplinary action may occur. Everett sent an email to the Licensing Division on
28 May 28, 2024, and later that day, a representative from the Department's Licensing

1 Division redirected and instructed Everett to submit a written surrender request via e-mail
2 to the Licensing Actions Unit. On June 13, 2024, the Department's Licensing Actions
3 Unit confirmed that there were no emails sent by Respondent/Everett to its designated e-
4 mail account.

5 **FIRST CAUSE FOR DISCIPLINE**

6 (Failure to Provide Access to the Licensed Premises)

7 28. Respondent is subject to disciplinary action under Code section 26030,
8 subdivisions (a) and (c), in that it failed to comply with Code section 26160, subdivision
9 (e), and Title 4 of the California Code of Regulations, section 17800, subdivisions (a)-(b),
10 requiring a licensee to comply with the Department's request for inspection of its licensed
11 premises as is more particularly alleged in paragraphs 24 through 25, above, which are
12 hereby incorporated by reference and realleged as if fully set forth herein.

13 **SECOND CAUSE FOR DISCIPLINE**

14 (Failure to Provide a Valid Seller's Permit)

15 29. Respondent is subject to disciplinary action under Code sections 26030,
16 subdivision (a), in that it failed to comply with Code section 26051.5, subdivision (a) and
17 Title 4 of the California Code of Regulations, section 15002, subdivision (c)(20),
18 requiring a valid seller's permit issued by the CDTFA to engage in commercial cannabis
19 activity as is more particularly alleged in paragraphs 23 through 27, above, which are
20 hereby incorporated by reference and realleged as if fully set forth herein.

21 **THIRD CAUSE FOR DISCIPLINE**

22 (Failure to Maintain a Functional Video Surveillance System)

23 30. Respondent is subject to disciplinary action under Code section 26030,
24 subdivisions (a) and (c), in that it failed to comply with the provisions of Title 4 of the
25 California Code of Regulations, section 15044, subdivisions (b) and (f), requiring 24-hour
26 video surveillance at the licensed premises as is more particularly alleged in paragraphs 24
27 through 25, above, which are hereby incorporated by reference and realleged as if fully set
28 forth herein.

1 PRAYER

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

4 1. Revoking the Adult-Use and Medicinal Retailer - Non-Storefront License
5 Number C9-0000385-LIC issued to Commerce on Demand LLC, dba Good Tree
6 (Respondent) with Rashaan Everett as Owner;

7 2. Ordering Respondent Commerce on Demand LLC, dba Good Tree
8 (Respondent) with Rashaan Everett as Owner, to pay the reasonable costs of the
9 investigation and enforcement of this case, pursuant to Business and Professions Code
10 section 26031.1; and

11 3. Taking such other and further action as deemed necessary and proper.
12
13

14 DATED: December 27, 2024

Evelyn Schaeffer

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

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
P.O. Box 85266
5 San Diego, CA 92186-5266
Telephone: (619) 738-9407
6 Facsimile: (619) 645-2061
E-mail: Harinder.Kapur@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC24-0000091

12 COMMERCE ON DEMAND LLC DBA
GOOD TREE; RASHAAN M. EVERETT,
13 DRP

REQUEST FOR DISCOVERY

14 Respondent.

15 **TO RESPONDENT:**

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

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

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

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

26 a. A statement of a person, other than the Respondent, named in the
27 initial administrative pleading, or in any additional pleading, when it is claimed that
28

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

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

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

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

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

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

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

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

28 ///

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

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

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

11 Dated: January 2, 2025

ROB BONTA
Attorney General of California

Harinder Kapur

HARINDER K. KAPUR
Senior Assistant Attorney General
Attorneys for Complainant

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

In the Matter of the Accusation Against:

**COMMERCE ON DEMAND LLC DBA
GOOD TREE; RASHAAN M. EVERETT,
DRP,**

Respondent.

Case No. DCC24-0000091

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>.

SD2024802940
84898956.docx

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

In the Matter of the Accusation Against:

**COMMERCE ON DEMAND LLC DBA
GOOD TREE; RASHAAN M. EVERETT,
DRP,**

Respondent.

Case No. DCC24-0000091

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>.

SD2024802940
84898956.docx

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

SECTION 11507.5: Exclusivity of discovery provisions

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

SECTION 11507.6: Request for discovery

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

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

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

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

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

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

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

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

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

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

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

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

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

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

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

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

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

Case Name: **In the Matter of the Accusation Against Commerce on Demand LLC dba Good Tree**

No.: **DCC24-0000091**

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 January 3, 2025, 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 transmitting a true copy via electronic mail. In addition, I placed true copies thereof enclosed in two separate sealed envelopes as certified mail with return receipts requested. I also placed true copies 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** in two separate sealed envelopes as first-class mail in the internal mail collection system at the Office of the Attorney General at 600 West Broadway, Suite 1800, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

Commerce on Demand LLC dba Good Tree
Rashaan M. Everett, Owner
7121 Telegraph Road
Montebello, CA 90640

Commerce on Demand LLC dba Good Tree
Rashaan M. Everett, Owner
17318 DeGroot Place
Cerritos, CA 90703

E-mail Address: rashaan@growingtalent.org

Certified Article Number

9414 7266 9904 2232 2811 77

SENDER'S RECORD

Certified Article Number

9414 7266 9904 2232 2768 21

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 January 3, 2025, at San Diego, California.

N. Amansec
Declarant

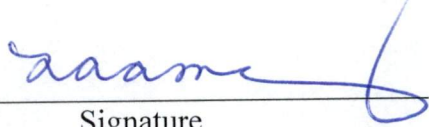

Signature

Exhibit 2

License History Certification for Respondent



Department of
Cannabis Control
CALIFORNIA

Department of Cannabis Control
licensing@cannabis.ca.gov, www.cannabis.ca.gov

Cannabis Retailer Nonstorefront License Adult-Use and Medicinal

Business Name:
Commerce on Demand LLC

Good Tree

License Number: C9-0000385-LIC
License Type: Retailer Nonstorefront
(Delivery)

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

Premises Address:
7121 TELEGRAPH RD
MONTEBELLO, CA 90640-6511

APN:
6354-024-039
MONTEBELLO

Valid: 11/9/2020
Expires: 11/9/2024

Scan to verify this
license.



Non-Transferable



Post in Public View

Scan to verify this license.



Valid:

11/9/2020

Expires:

11/9/2024

License No:

C9-0000385-LIC

Legal Business Name:

Commerce on Demand LLC
Good Tree

Premises Address:

7121 TELEGRAPH RD
MONTEBELLO, CA 90640-6511

APN:

6354-024-039
MONTEBELLO

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at [CApotcheck.com](https://www.capotcheck.com) using license number C9-0000385-LIC.

Exhibit 3

Certification of 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
P.O. Box 85266
5 San Diego, CA 92186-5266
Telephone: (619) 738-9407
6 Facsimile: (619) 645-2061
E-mail: Harinder.Kapur@doj.ca.gov
7 *Attorneys for Complainant*

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

10 In the Matter of the Accusation Against:

Case No. DCC24-00091-INV

11 **COMMERCE ON DEMAND LLC DBA**
12 **GOOD TREE;**
13 **RASHAAN M. EVERETT, OWNER**
14 **7121 Telegraph Road**
15 **Montebello, CA 90640**

CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF HARINDER K.
KAPUR

16 **Retailer Non-Storefront License**
17 **No. C9-0000385-LIC**

[Business and Professions Code § 26031.1]

Respondent.

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

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

25 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance
26 Division of the Department of Cannabis Control, in this action. On or about August 21, 2024, I
27 assigned this case to Deputy Attorney General Robert T. White for handling. On or about
28 December 10, 2024, the case was reassigned to me for handling.

1 3. Our Office's computerized case management system reflects that the following
2 persons have performed tasks related to this matter: Harinder K. Kapur, Senior Assistant
3 Attorney General, Gregory M. Cribbs, Supervising Deputy Attorney General, Robert T. White,
4 Deputy Attorney General, and Helen Koh, Senior Legal Analyst.

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

10 5. On March 7, 2025, I requested a billing summary for this case from the Accounting
11 Department of the DOJ. In response, on March 7, 2025, a document entitled "Matter Time
12 Activity by Professional Type" was forwarded to my attention. I hereby certify that the Matter
13 Time Activity by Professional Type, attached hereto as Exhibit A, and herein incorporated by
14 reference, is a true and correct copy of the billing summary for this matter that I received from the
15 Accounting Department. The summary includes the billing costs incurred by me, as well as other
16 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the
17 amount of time billed for the activity, and the billing rate by professional type. The billing
18 summary is comprehensive of the charges by the Office to the Department of Cannabis Control
19 through March 7, 2025. It does not include billing for tasks performed after March 7, 2025.

20 6. Based upon the time reported through March 7, 2025, as set forth in Exhibit A, DOJ
21 has billed the Department of Cannabis Control \$5,741.25 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 ///

26 ///

27 ///

28 ///

1 I certify under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on March 7, 2025, in the City of San Diego,
3 California.

4 *Harinder Kapur*

5 HARINDER K. KAPUR
6 Senior Assistant Attorney General
7 Declarant

8 SD2024802940Declaration of Costs.docx
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Exhibit A
Matter Time Activity by Professional Type



Matter Time Activity By Professional Type

As of Mar 7, 2025

Matter ID: SD2024802940					Date Opened: 08/22/2024				
Description: Commerce on Demand LLC dba Good Tree (ACC)									
Professional Type: Attorney									
Fiscal Year: 2024									
Professional: Gregory M. Cribbs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605321888	11/22/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		11/30/24
605335695	12/5/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		12/31/24
605370729	12/30/24	CV-CCS:290	02668	Analysis/Strategy	0.25	\$228.00	\$57.00		12/31/24
Gregory M. Cribbs Totals:					0.75		\$171.00		
Professional: Harinder K. Kapur									
802933232	10/28/24	CV-CCS:290	02668	Supervisory Review	0.25	\$228.00	\$57.00		10/31/24
802978431	12/10/24	CV-CCS:290	02668	Case Management	0.50	\$228.00	\$114.00		12/31/24
802981493	12/11/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		12/31/24
802999610	1/2/25	CV-CCS:290	02668	Case Management	0.50	\$228.00	\$114.00		1/31/25
802999628	1/3/25	CV-CCS:290	02668	Contract/Document Preparation	0.25	\$228.00	\$57.00		1/31/25
803025134	1/29/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		1/31/25
803064958	3/6/25	CV-CCS:290	02668	Pleading Preparation	1.75	\$228.00	\$399.00		
803065200	3/7/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$228.00	\$171.00		
Harinder K. Kapur Totals:					4.75		\$1,083.00		
Professional: Robert Tomlin White									
802926738	10/10/24	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		10/31/24
802935441	10/18/24	CV-CCS:290	02668	Pleading Preparation	2.50	\$228.00	\$570.00		10/31/24
802939904	10/23/24	CV-CCS:290	02668	Pleading Preparation	1.00	\$228.00	\$228.00		10/31/24
802939912	10/24/24	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		10/31/24
Robert Tomlin White Totals:					4.50		\$1,026.00		
2024 Totals:					10.00		\$2,280.00		
Attorney Totals:					10.00		\$2,280.00		



Matter Time Activity By Professional Type

As of Mar 7, 2025

Matter ID: SD2024802940					Date Opened: 08/22/2024				
Description: Commerce on Demand LLC dba Good Tree (ACC)									
Professional Type: Paralegal									
Fiscal Year: 2024									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
802862820	8/22/24	CV-CCS:290	02668	Case Management	1.00	\$213.00	\$213.00		8/31/24
802901767	9/27/24	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		9/30/24
802909567	10/3/24	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		10/31/24
802912058	10/7/24	CV-CCS:290	02668	Pleading Preparation	5.00	\$213.00	\$1,065.00		10/31/24
802913367	10/8/24	CV-CCS:290	02668	Pleading Preparation	5.50	\$213.00	\$1,171.50		10/31/24
802914084	10/9/24	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		10/31/24
802999002	1/2/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$213.00	\$106.50		1/31/25
803024979	1/29/25	CV-CCS:290	02668	Pleading Preparation	2.75	\$213.00	\$585.75		1/31/25
803025043	1/29/25	CV-CCS:290	02668	Cost Recovery	0.50	\$213.00	\$106.50		1/31/25
803033714	2/5/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		
Helen Koh Totals:					16.25		\$3,461.25		
2024 Totals:					16.25		\$3,461.25		
Paralegal Totals:					16.25		\$3,461.25		
SD2024802940 Totals:					26.25		\$5,741.25		

Exhibit 4

Investigation Report with Attached Exhibits

INVESTIGATION REPORT

STATE OF CALIFORNIA



Department of
Cannabis Control
CALIFORNIA



CASE INFORMATION

Case Number DCC24-0000091-INV	Date Received
License Number C9-0000385-LIC	Legal Business Name of Licensee or Unlicensed Party Rashaan M. Everett
DBA Good Tree	Premises Address 7121 Telegraph Rd, Montebello, CA 90640
Business Phone Number (562) 360-4819	Author's Name Jeffrey Routsong
Date of Incident April 24, 2024 / May 8, 2024	Location of Incident 7121 Telegraph Rd, Montebello, CA 90640

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

Name (First, Middle, Last) Rashaan M. Everett	Title Owner Applicant, Primary Contact
Address (include street, city, state, and zip code) 17318 De Groot Place, Cerritos, CA 90703	
E-mail Address rashaan@growingtalent.org	Phone Number (562) 360-4819

Miscellaneous Information

The Department of Cannabis Control's licensing database shows as of May 24, 2024, Rashaan Everett is 100% owner and officer of C9-0000385-LIC.

Rashaan Everett is also 100% owner of C11-0001267-LIC, located at the same address as C9-0000385-LIC.

SUMMARY

On April 24, 2024, a regulatory compliance inspection was attempted by the Department of Cannabis Control (DCC). The inspection was conducted at licensed Retail Non-Storefront, Commerce on Demand LLC (COD or Licensee), doing business as (DBA) Good Tree, with license number C9-0000385-LIC (License), and a licensed premises physically located at 7121 Telegraph Rd, Montebello, CA 90640 (Premises). I, Special Investigator (SI) Jeff Routsong (Routsong), led the attempted inspection of COD's premises. During the attempted inspection I knocked on the door of the premises, no employees answered or opened the door. I observed on the outside of the premises that the surveillance cameras had been removed. I attempted to contact the Designated Representative Party (DRP) Rashaan Everett (Everett). I called and emailed the contact information listed in the DCC database; I did not receive a response. I waited at the premises for approximately 45 (Forty-Five) minutes before departing.

On May 8, 2024, I attempted to conduct a regulatory compliance inspection at COD's licensed premises. During the attempted inspection I again knocked on the door of the premises, no employees answered or opened the door. I observed that on the outside of the premises the surveillance cameras were still removed from their ports I attempted to contact Everett; I did not receive a response. I waited at the premises for approximately Forty-Five (45) minutes before departing.



BACKGROUND

On February 16, 2024, Supervising Special Investigator (SSI) Harley Voss (Voss) emailed Everett a Letter of Warning (LOW) (**Attachment A**). The LOW informed Everett that the Department had information that COD is not in compliance with the Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and its implementing regulations requiring a licensee to have a valid seller's permit issued by the California Department of Tax and Fee Administration (CDTFA). The LOW required Everett to immediately submit to the Department a valid seller's permit. As of April 23, 2024, no response was received by the Department.

On March 28, 2024, DCC SSI Jacob Nuchols (Nuchols) tasked me with conducting a regulatory compliance inspection at COD's license.

A preliminary review of COD's California Track and Trace Program (METRC) account showed that COD had One Hundred and Seventy-Six (176) active packages in their METRC inventory. COD's METRC inventory was comprised of packaged cannabis flower, tincture, vape cartridges, pre-rolls, and edibles. COD's last recorded sale was April 10, 2023, and the last METRC log in was February 8, 2024.

On May 24, 2024, Nuchols emailed Everett a Notice to Comply (NTC) (**Attachment B**). The NTC informed Everett that he was required to submit to the Department a valid Seller's Permit within Ten (10) calendar days of receipt of the notice. Everett failed to supply a valid Seller's Permit as directed and required.

CASE NARRATIVE

On April 23, 2024, I searched for COD's licensing data listed on the DCC licensing databases, Accela, and METRC. The DCC issued COD an annual Retailer Nonstorefront license on November 9, 2020, the license is set to expire November 9, 2024. Everett is listed as a Business Owner in the DCC database. Everett was also listed as an Owner Applicant and On-site Contact. COD was credentialed in METRC on November 9, 2020. COD has no previous administrative action or disciplinary history listed in the DCC databases other than the referenced LOW. I also searched the Secretary of State (SOS) database, upon review of COD's most recent Statement of Information (**Attachment C**) filed on December 22, 2021, COD's Limited Liability Company (LLC) was confirmed to be active. I obtained a copy of COD's most recent premises diagram from the DCC licensing database, Accela, for reference during my inspection. I reviewed COD's METRC account to familiarize myself with the licenses current inventory, I then cross referenced the METRC audit files and audit notes with COD's real time inventory data, and no major discrepancies were found during my audit.

On April 24, 2024, I contacted CDTFA, Business Tax Specialist II Ruben Flores (Flores) regarding COD's Seller's Permit status. Flores confirmed that COD does not possess a valid Sellers' Permit and is not permitted to make sales in California (**Attachment D**).

At approximately 1030 on this date, DCC personnel SI Eric Kinney (Kinney), and I arrived at COD's Retail Non-Storefront licensed premises located at, 7121 Telegraph Rd, Montebello, CA 90640, for a regulatory compliance inspection. Upon arrival, I observed that the front of the premises had two surveillance camera ports (**Attachment E**) that had been disconnected and the connection wires were exposed. I knocked on the front door of the premises and announced that I was from the DCC and requesting access for a compliance inspection; no employees responded or answered the door. At approximately 1045 I called Everett at (562) 360-4819; I left a voice mail introducing myself and requesting immediate access to the premises for a compliance inspection. I then emailed Everett (**Attachment F**) informing him that I was at his licensed premises for a compliance inspection and needed immediate access; I did not receive a response. SI Kinney and I departed at approximately 1130.

On May 7, 2024, I emailed Everett a notice of inspection (**Attachment G**) scheduled for May 8, 2024, at 0830. I did not receive a response. I conducted a Metrc review of COD's METRC account, no login attempts had been made since my initial review.

On May 8, 2024, SI Kinney and I arrived at COD's Retailer Non-storefront licensed premises at 0830 for a



INVESTIGATION REPORT (continued)

second attempt to inspect the licensed premises. I observed that the surveillance cameras witnessed during my initial inspection were still disconnected. I knocked on the front door of the premises, introduced myself and requested immediate access for a compliance inspection; no employees responded or answered the door. I called Everett and left a voicemail requesting access for a compliance inspection; I did not receive a response. SI Kinney and I waited at the front door of the premises for approximately Forty-Five (45) minutes before departing.

On May 24, 2024, Nuchols emailed Everett an NTC informing Everett that he shall submit to the Department a valid Seller's Permit within Ten (10) calendar days of receipt of the notice.

On May 25, 2024, Everett emailed Nuchols (**Attachment H**) requesting to surrender his DCC issued cannabis business license.

On May 28, 2024, Nuchols returned Everett's email advising Everett to contact licensing@cannabis.ca.gov for instructions on how to surrender a DCC license. That same day, Everett emailed licensing@cannabis.ca.gov and requested to surrender his DCC licenses. Licensing Division, Customer Service Analyst Kayla Santora Walker (Walker) responded to Everett (**Attachment I**). Walker instructed Everett to contact licensingactions@cannabis.ca.gov and submit a written request for surrender.

On June 13, 2024, Nuchols emailed DCC licensingactions@cannabis.ca.gov inquiring if Everett had contacted them regarding Everett's request for surrender. Licensing Actions Unit Analyst Christopher Hoang (Hoang) responded to Nuchols and informed Nuchols (**Attachment J**) that DCC Licensing Actions had not received correspondence from Everett.

The NTC Nuchols emailed to Everett on May 24, 2024, had a return date to the Department of June 3, 2024. As of June 6, 2024, Everett has not reached out to the Department or returned any voice messages or email requests.

WITNESS LIST

Witness #1

- Name: Harly Voss
- Title/Position: Supervising Special Investigator
- Address: Region 4
- Phone: (916) 767-3023
- E-mail: Harley.Voss@Cannabis.ca.gov
- Miscellaneous information: Provided the Licensee with a LOW.

Witness #2

- Name: Ruben Flores
- Title/Position: Business Tax Specialist II
- Address: Los Angeles
- Phone: (626) 347-6536
- E-mail: Ruben.Flores@cdtfa.ca.gov
- Miscellaneous information: Flores confirmed that COD does not have a valid Seller's Permit.

Witness #3

- Name: Eric Kinney
- Title/Position: Special Investigator



INVESTIGATION REPORT (continued)

- Address: Los Angeles
- Phone: (279) 220-5477
- E-mail: Eric.Kinney@cannabis.ca.gov
- Miscellaneous information: Present for both attempted inspections.

Witness #4

- Name: Jeffrey Routsong
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: (831) 206-2661
- E-mail: Jeffrey.Routsong@cannabis.ca.gov
- Miscellaneous information: Lead SI for both attempted inspections.

Witness #5

- Name: Jacob Nuchols
- Title/Position: Supervising Special Investigator
- Address: Riverside
- Phone: (937) 272-6347
- E-mail: Jacob.nuchols@cannabis.ca.gov
- Miscellaneous information: Exchanged emails with Licensee.

PREPARER

Name	Title
Jeffrey Routsong	Special Investigator
Signature Jeffrey Routsong	Date 7/31/2024

Digitally signed by Jeffrey Routsong
Date: 2024.07.31 15:00:01 -07'00'

REVIEWER

Name	Title
Jacob Nuchols	Supervising Special Investigator
Signature Nuchols, Jacob@Cannabis	Date

Digitally signed by Nuchols, Jacob@Cannabis
Date: 2024.07.31 15:12:19 -07'00'

LIST OF ATTACHMENTS

- Letter of Warning
- Notice to Comply
- Secretary of State Filing
- Email from Flores
- Photos of Camera Ports
- Email to Everett
- Notice of Inspection
- Everett email correspondence to Nuchols
- Everett email correspondence to Walker
- Nuchols email correspondence to Hoang

Attachment A – Letter of Warning
(3 Pages)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV



February 15, 2024

Department Case #:
DCC24-0000282-INV

Rashaan M. Everett
Commerce on Demand LLC
17318 De Groot Place
Cerritos, CA 90703

Via electronic mail: Rashaan@growingtalent.org

Re: **Letter of Warning – Revoked Seller’s Permit**
Premises Address: 7121 Telegraph Rd Montebello, CA 90640, APN(s): 6354-024-039

Dear Rashaan M. Everett:

You are hereby warned that the Department of Cannabis Control (Department) has evidence that Commerce on Demand LLC has engaged in activities in violation of the laws and regulations applicable to the license(s) C9-0000385-LIC, C11-0001267-LIC, and CDPH-10004633 issued to Commerce on Demand LLC. Failure to comply with the provisions of the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) and applicable regulations is cause for discipline under Business and Professions Code (BPC) section 26030.

Specifically, the Department has information that Commerce on Demand LLC is not in compliance with the MAUCRSA and its implementing regulations requiring a licensee to have a valid seller’s permit issued by the California Department of Tax and Fee Administration (CDTFA). BPC section 26051.5, subdivision (a)(6) requires a valid seller’s permit to qualify for licensure. On or about October 24, 2022, the CDTFA revoked Commerce on Demand LLC seller’s permit.

Pursuant to BPC section 26031, subdivision (c) and California Code of Regulations, title 4, section 15000.5, the Department may take action against a license for violations of the MAUCRSA and its implementing regulations by the licensee, owner, officer, employee or any other person acting on behalf of the licensee or engaged in commercial cannabis activity.

Immediately, you are to take the following action:

1. You must submit to the Department at the email address listed below a valid seller's permit number issued to Commerce on Demand LLC by the CDTFA

For more information on seller's permits, please contact CDTFA's Customer Service Center at 1-800-400-7115 (CRS:711). Customer service representatives are available Monday through Friday from 7:30 a.m. to 5:00 p.m. (Pacific time), except state holidays or at their website: <https://www.cdtfa.ca.gov>

This letter serves as notice that continued failure to comply with statutory and regulatory requirements may result in disciplinary action, leading up to, and including, revocation of Commerce on Demand LLC license(s).

For questions regarding this notice, please contact the Department by emailing investigations@cannabis.ca.gov and reference the Department case number listed on the first page of this letter.

Sincerely,

Mendez,
Jose@cannabis
Jose Mendez
Chief, Investigative Services Branch
Compliance Division

Digitally signed by
Mendez, Jose@cannabis
Date: 2024.02.15
13:19:54 -08'00'

Attachment B – Notice to Comply (3 Pages)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

Notice to Comply

Date of issuance: May 24, 2024

Date of inspection, if applicable: N/A

Business information

License number: C9-0000385-LIC

License type: Cannabis - Retailer
Nonstorefront License

Premises address: 7121 TELEGRAPH RD,
MONTEBELLO, CA 90640

Phone number: 562-360-4819

Notice recipient information

Name and title: Rashaan Everett – Primary
Contact & Owner

Phone number: 562-360-4819

Email address: rashaan@growingtalent.org

Mailing address: 17318 De Groot Place, Cerritos,
Ca, 90703

Method of service: Email

The Department of Cannabis Control (Department) has determined that the licensee referenced above is not in compliance with statutory or regulatory requirements applicable to the license. This Notice to Comply (Notice) is issued pursuant to California Code of Regulations (CCR), title 4, section 17801. Failure to correct violation(s) in this Notice may result in disciplinary action. The violations noted in this Notice may not include all violations.

This Notice must be signed and returned to the Department. By signing this Notice below, you are acknowledging its receipt and notice of the violations listed herein. The signed Notice must be returned to the Department **no later than 06/03/2024**, along with a written plan if required. If a written plan is needed to address a specific violation, it will be noted in the Table of Violations that follows.

This Notice must be returned to the Department via email at jacob.nuchols@cannabis.ca.gov or by mail at:

Department of Cannabis Control
Attention: Compliance Division
2920 Kilgore Road
Rancho Cordova, CA 95670

If you have any questions, please contact the Department representative listed below and include the license number and this Notice's date of issuance on any correspondence.

Department information

Department representative: Jacob Nuchols **ID #:** 4031

Signature:

Title: Supervising Special Investigator I **Email address:** jacob.nuchols@cannabis.ca.gov



Table A

The table that follows indicates the statutory and regulatory provisions violated, the nature and facts of each violation, and whether a written plan is required to address the violation.

Table of violations number	Violation
1	<p>Business and Professions Code section 26051.5, subdivision (a)(6) Seller's Permit Requirements</p> <p>Business and Professions Code section 26051.5, subdivision (a)(6) requires a valid seller's permit issued pursuant to Part 1 (commencing with Section 6001) of Division 2 of the Revenue and Taxation Code to qualify for licensure. On or about 10/24/2022 the California Department of Tax and Fee Administration revoked COMMERCE ON DEMAND LLC seller's permit.</p> <p>To correct this violation, the licensee must submit a valid seller's permit number to the Department within 10 calendar days of receipt of this notice.</p>



Table B

Please indicate in Table B below how each violation has been addressed and compliance was achieved or will be achieved if the violation requires a written plan. Entries of violations should match those listed in Table A above.

Table of violations number	Statutes/regulations violated	How compliance was achieved or will be achieved if a written plan is required
1	26051.5	

The violations referenced in this Notice have been corrected and compliance has been achieved as described above and in documentation submitted to the Department in response to this Notice. If a written plan was required, the violations addressed in that plan will be corrected and compliance will be achieved as required in the Department's approval of the written plan.

I understand that providing the Department with inaccurate or false information may be cause for disciplinary action.

Printed name of licensee:

Date:

Signature of licensee:



Attachment C – Secretary of State Filing
(1 Page)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

21-G65056

FILED

In the office of the Secretary of State
of the State of California

DEC 22, 2021

This Space For Office Use Only

IMPORTANT — [Read instructions](#) before completing this form.

Filing Fee – \$20.00

Copy Fees – First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

COMMERCE ON DEMAND LLC

2. 12-Digit Secretary of State File Number
202011810198

3. State, Foreign Country or Place of Organization (only if formed outside of California)
CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 7121 Telegraph Road	City (no abbreviations) Montebello	State CA	Zip Code 90640
b. Mailing Address of LLC, if different than item 4a 7121 Telegraph Road	City (no abbreviations) Montebello	State CA	Zip Code 90640
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 7121 Telegraph Road	City (no abbreviations) Montebello	State CA	Zip Code 90640

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b Rashaan	Middle Name	Last Name Everett	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 7121 Telegraph Road	City (no abbreviations) Montebello	State CA	Zip Code 90640

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box			
	City (no abbreviations)	State CA	Zip Code

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

CORPORATION SERVICE COMPANY WHICH WILL DO BUSINESS IN CALIFORNIA AS CSC - LAWYERS INCORPORATING SERVICE (C1592199)

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company
Holding Company

8. Chief Executive Officer, if elected or appointed

a. First Name Rashaan	Middle Name	Last Name Everett	Suffix
b. Address 7121 Telegraph Road	City (no abbreviations) Montebello	State CA	Zip Code 90640

9. The Information contained herein, including any attachments, is true and correct.

12/22/2021

Rashaan Everett

Manager

Date

Type or Print Name of Person Completing the Form

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS](#) BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []

Attachment D – Email from CDTFA, Business Tax Specialist II
Ruben Flores

(1 Page)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

Routsong, Jeffrey@Cannabis

From: Flores, Ruben M <Ruben.Flores@cdtfa.ca.gov>
Sent: Wednesday, April 24, 2024 10:26 AM
To: Routsong, Jeffrey@Cannabis
Cc: Diehl, Scott A; Arreola, Erik
Subject: Commerce on Demand LLC
Attachments: Sellers Permit Verification Page_218-165632.pdf; DCC License_COD LLC_Active.pdf

[EXTERNAL]: Ruben.Flores@cdtfa.ca.gov

CAUTION: THIS EMAIL ORIGINATED OUTSIDE THE DEPARTMENT OF CANNABIS CONTROL!

DO NOT: click links or open attachments unless you know the content is safe.

NEVER: provide credentials on websites via a clicked link in an Email.

Hi Jeff,

Checking our Department records for seller's permit it shows that the business known as **Commerce on Demand** does not possess a valid seller's permit at this time. This means they are not permitted to conduct sales in California.

See RTC 6071 for more. <https://www.cdtfa.ca.gov/lawguides/vol1/sutl/6071.html>

Ruben M. Flores
Cannabis and Sales Suppression Section
California Department of Tax and Fee Administration
21680 Gateway Center Drive, Suite 200 Diamond Bar, CA 91765
Phone: [626-347-6536](tel:626-347-6536) | Fax: [279-279-7372](tel:279-279-7372)
E: ruben.flores@cdtfa.ca.gov | www.cdtfa.ca.gov

Confidential information of the California Department of Tax and Fee Administration – unauthorized use or disclosure is strictly prohibited by law. If you receive this e-mail in error, please immediately notify this agency by return e-mail and delete this message from your computer, without printing the message, and without disclosing its contents to any person other than the sender or recipient. Persons who copy or disclose such confidential information are subject to applicable legal penalties.

Disclaimer: Any and all tax advice contained in this e-mail and all attachments, is intended to provide general information regarding the application of the tax and will not serve as a basis for relief of liability under Revenue and Taxation Code section 6596.

Attachment E – Camera Photos

(3 Photos)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

7121



c [REDACTED] p, LLC

Apr 24, 2024 at 10:51:0
7113 Telegrap
Montebello CA 9
United S



Apr 24, 2024 at 10:51:13 AM
7113 Telegraph Rd
Montebello CA 90640
United States



Apr 24, 2024 at 10:51:16 AM
7113 Telegraph Rd
Montebello CA 90640
United States



Attachment F – Routsong email to Everett
(1 Page)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

From: [Routsong, Jeffrey@Cannabis](mailto:Routsong,Jeffrey@Cannabis)
To: [Rashaan Everett](#)
Subject: Inspection
Date: Wednesday, April 24, 2024 10:49:57 AM

Good morning,

My team is currently at Your 7121 Telegraph Rd. address. We are here to do an unannounced compliance inspection of your retail nonstore delivery license. Please respond to this email and provide assistance to gain access to your premises.

Thank you,

Jeff Routsong
Special Investigator
Department of Cannabis Control

Attachment G – Notice of Inspection
(1 Page)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

From: [Routsong, Jeffrey@Cannabis](mailto:Routsong,Jeffrey@Cannabis)
To: [Rashaan Everett](#)
Bcc: [Nuchols, Jacob@Cannabis](mailto:Nuchols,Jacob@Cannabis)
Subject: Notice of Inspection
Date: Tuesday, May 7, 2024 3:05:00 PM
Attachments: [image001.png](#)

Good afternoon,

Per §17800(a), the Department, for purposes of inspection, investigation, review, or audit, shall have full and immediate access to enter any premises licensed by the Department. Further §17800(b) goes on to state “prior notice of an inspection, investigation, review, or audit is not required.” At this time, the licensee has failed to grant full and immediate access to the licensed premises for an inspection on 4/24/2024, which could constitute a violation.

The California Department of Cannabis Control will be conducting an inspection at the licensed premises of Commerce on Demand located at 7121 Telegraph Rd, on 5/8/2024. This inspection is scheduled to occur at 8:30AM. The licensed premises and all facilities associated with the licensed operation must be made available for inspection at the above-stated time scheduled for inspection. Failure to allow access to the site as required may result in a violation with a maximum fine of \$5,000 per violation. Additionally, each day you fail to provide access would constitute a new violation per day denied.

Please respond to this email acknowledging that you have received it and if you have any questions, please ask.

Thank you,

Jeff Routsong

Special Investigator

Investigative Services Branch

844-61-CA-DCC (844-612-2322)

info@cannabis.ca.gov

www.cannabis.ca.gov



Attachment H – Everett email correspondence to Nuchols
(2 Pages)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

From: Nuchols, Jacob@Cannabis
To: [Rashaan Everett](#)
Subject: RE: Commerce on Demand LLC - C9-0000385-LIC - ACTION REQUIRED
Date: Tuesday, May 28, 2024 5:37:00 AM
Attachments: [image003.png](#)
[image001.png](#)

Good morning,

If you wish to surrender your license, you will need to contact licensing@cannabis.ca.gov and advise them of such. They will provide you with any specific instructions on surrendering your license if you wish. Please note, the Notice to Comply (NTC) issued to the licensee is still active/valid and requires a response by the provided due date. If you are electing to surrender your license, email me a copy of your email to licensing@cannabis.ca.gov for receipt before the NTC due date. If not, I will expect a response and completion of the NTC. Failure to comply may result in disciplinary actions.

Thank you,

Jacob Nuchols

Supervising Special Investigator
Compliance Division

mobile: 937.272.6347
844-61-CA-DCC (844-612-2322)
www.cannabis.ca.gov



From: Rashaan Everett <rashaan@growingtalent.org>
Sent: Saturday, May 25, 2024 7:45 AM
To: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>
Subject: Re: Commerce on Demand LLC - C9-0000385-LIC - ACTION REQUIRED

[EXTERNAL]: rashaan@growingtalent.org

CAUTION: THIS EMAIL ORIGINATED OUTSIDE THE DEPARTMENT OF CANNABIS CONTROL!
DO NOT: click links or open attachments unless you know the content is safe.
NEVER: provide credentials on websites via a clicked link in an Email.

Hi,

How do we surrender our licenses? I've been trying to find a buyer but no one wants them.

We've been closed since December.

On Friday, May 24, 2024, Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov> wrote:

Good morning,

Please find the attached **Notice to Comply** issued against the above listed license. Please read, review and respond by the listed date, 06/03/2024, with the required information.

If you have any questions, please let me know.

Thank you,

Jacob Nuchols

Supervising Special Investigator
Compliance Division

mobile: 937.272.6347
844-61-CA-DCC (844-612-2322)
www.cannabis.ca.gov



--

Rashaan M. Everett

President

GetGoodTree.com | GrowingTalent.org

Implementing Smart Social Equity

Attachment I – Nuchols email correspondence to Licensing
Actions

(3 Pages)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

From: Licensingactions@Cannabis
To: Nuchols_Jacob@Cannabis
Subject: RE: Please advise: surrender request
Date: Thursday, June 13, 2024 1:52:51 PM
Attachments: [image005.png](#)
[image006.png](#)
[image001.png](#)

Hello Jacob,

We have not received a surrender request for C9-0000385-LIC and our inbox does not contain any correspondence with rashaan@growingtalent.org.

Thank you!

Christopher Hoang

Licensing Actions Unit



Integrity • Fairness • Innovation • Knowledge • Collaboration • Support

From: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>

Sent: Thursday, June 13, 2024 1:48 PM

To: Licensingactions@Cannabis <licensingactions@cannabis.ca.gov>

Subject: FW: Please advise: surrender request

Good morning,

Can you please advise if the below listed licensee ever reached out regarding their request to surrender their State license, reference C9-0000385-LIC. I checked Accela and did not see anything that indicates it is in the process of being surrendered.

Thanks,

Jacob Nuchols

Supervising Special Investigator

Compliance Division

mobile: 937.272.6347

844-61-CA-DCC (844-612-2322)

www.cannabis.ca.gov



From: Licensing@Cannabis <licensing@cannabis.ca.gov>
Sent: Tuesday, May 28, 2024 8:54 AM
To: Rashaan Everett <rashaan@growingtalent.org>
Cc: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>
Subject: RE: Please advise: surrender request

Good morning,

A licensee may request to surrender their license at any time. Surrender requests must be submitted in writing by the DRP and emailed to the Licensing Actions Unit (LAU) at licensingactions@cannabis.ca.gov. Any additional questions you may have regarding surrendering the license can also be referred to licensingactions@cannabis.ca.gov.

Best,
Kayla Santora Walker
Licensing Division, Customer Service .

Staff Service Analyst

844-61-CA-DCC (844-612-2322)
www.cannabis.ca.gov



From: Rashaan Everett <rashaan@growingtalent.org>
Sent: Tuesday, May 28, 2024 8:46 AM
To: Licensing@Cannabis <licensing@cannabis.ca.gov>
Cc: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>
Subject: Please advise: surrender request

[EXTERNAL]: rashaan@growingtalent.org

CAUTION: THIS EMAIL ORIGINATED OUTSIDE THE DEPARTMENT OF CANNABIS CONTROL!

DO NOT: click links or open attachments unless you know the content is safe.

NEVER: provide credentials on websites via a clicked link in an Email.

Hi,

I'd like to surrender my DCC licenses.

--

Rashaan M. Everett

President

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Implementing Smart Social Equity

Attachment J – Nuchols email correspondence to Licensing
Actions

(3 Pages)

License Name: Commerce on Demand, LLC

DBA: Good Tree

Case Number: DCC24-0000091-INV

From: Licensingactions@Cannabis
To: Nuchols_Jacob@Cannabis
Subject: RE: Please advise: surrender request
Date: Thursday, June 13, 2024 1:52:51 PM
Attachments: [image005.png](#)
[image006.png](#)
[image001.png](#)

Hello Jacob,

We have not received a surrender request for C9-0000385-LIC and our inbox does not contain any correspondence with rashaan@growingtalent.org.

Thank you!

Christopher Hoang

Licensing Actions Unit



Integrity • Fairness • Innovation • Knowledge • Collaboration • Support

From: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>

Sent: Thursday, June 13, 2024 1:48 PM

To: Licensingactions@Cannabis <licensingactions@cannabis.ca.gov>

Subject: FW: Please advise: surrender request

Good morning,

Can you please advise if the below listed licensee ever reached out regarding their request to surrender their State license, reference C9-0000385-LIC. I checked Accela and did not see anything that indicates it is in the process of being surrendered.

Thanks,

Jacob Nuchols

Supervising Special Investigator

Compliance Division

mobile: 937.272.6347

844-61-CA-DCC (844-612-2322)

www.cannabis.ca.gov



From: Licensing@Cannabis <licensing@cannabis.ca.gov>
Sent: Tuesday, May 28, 2024 8:54 AM
To: Rashaan Everett <rashaan@growingtalent.org>
Cc: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>
Subject: RE: Please advise: surrender request

Good morning,

A licensee may request to surrender their license at any time. Surrender requests must be submitted in writing by the DRP and emailed to the Licensing Actions Unit (LAU) at licensingactions@cannabis.ca.gov. Any additional questions you may have regarding surrendering the license can also be referred to licensingactions@cannabis.ca.gov.

Best,
Kayla Santora Walker
Licensing Division, Customer Service .

Staff Service Analyst

844-61-CA-DCC (844-612-2322)
www.cannabis.ca.gov



From: Rashaan Everett <rashaan@growingtalent.org>
Sent: Tuesday, May 28, 2024 8:46 AM
To: Licensing@Cannabis <licensing@cannabis.ca.gov>
Cc: Nuchols, Jacob@Cannabis <Jacob.Nuchols@cannabis.ca.gov>
Subject: Please advise: surrender request

[EXTERNAL]: rashaan@growingtalent.org

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Hi,

I'd like to surrender my DCC licenses.

--

Rashaan M. Everett

President

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PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: COMMERCE ON DEMAND LLC, DBA GOOD TREE

DCC Case No. DCC24-0000091-INV

License Number: C9-0000385-LIC

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Department of Cannabis Control, 2920 Kilgore Road, Rancho Cordova, CA 95670. On March 11, 2025, I served the within documents:

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 Respondent and Respondent's attorney listed below.
- ☐ Service via certified mail to be completed upon the following business day.

Commerce on Demand LLC
dba Good Tree
Rashaan M. Evertt, Owner
7121 Telegraph Road
Montebello, CA 90703
rashaan@growingtalent.org

Commerce on Demand
dba Good Tree
Rashaan M. Evertt, Owner
17318 DeGroot Place
Cerritos, CA 90703
rashaan@growingtalent.org

Harinder Kapur
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 am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

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 March 11, 2025, at Rancho Cordova, California.

Erroll Abrahamian