



Department of  
Cannabis Control  
CALIFORNIA

Gavin Newsom  
Governor

Nicole Elliott  
Director

August 6, 2025

VIA EMAIL AND CERTIFIED MAIL

Dyrect #4 LLC  
Mauricio Garcia and  
Chloe Parker, Owners  
3595 Cadillac Ave., Ste. 102  
Costa Mesa, CA 92626  
mauricoagarcia289@gmail.com

Chloe Parker  
115 Bumblebee  
Irvine, CA 92618  
chloe@wooza.com

Ryan Maddocks  
Agent for Service of Process  
1102 El Prado Unit B  
San Clemente, CA 92672  
ryan@greencp.com

Re: Dyrect #4 LLC - Case No. DCC24-0000404-INV  
Default Decision and Order

Dear Messrs. Garcia and Maddocks and Ms. Parker:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent Dyrect #4 LLC, in default and therefore will proceed as described in the attached Default Decision and Order.

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

Barring such a timely motion, the attached Default Decision and Order involving Dyrect #4 LLC, will become effective on September 5, 2025.

Sincerely,

Douglas Smurr  
Assistant General Counsel

Enclosure

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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 **DYRECT #4 LLC; MAURICIO DEVADIP**  
13 **CORONA GARCIA, OWNER**  
14 **3595 Cadillac Ave, Suite 102**  
15 **Costa Mesa, CA 92626**

16 **Cannabis Distributor License**  
17 **No. C11-0001690-LIC**

18 Respondent.

Case No. DCC24-0000404-INV

**DEFAULT DECISION AND ORDER**

[Gov. Code, §11520]

19 **FINDINGS OF FACT**

20 1. On or about February 24, 2025, Complainant Evelyn Schaeffer, in her official  
21 capacity as the Deputy Director of the Compliance Division of the Department of Cannabis  
22 Control (Department), filed Accusation No. DCC24-0000404-INV against Dyrect #4 LLC  
23 (Respondent) with Mauricio Devadip Corona Garcia, Owner (Owner), before the Department of  
24 Cannabis Control. (Accusation attached as Exhibit A.)

25 2. On or about June 27, 2022, the Department issued Distributor License  
26 No. C11-0001690-LIC to Respondent. The Distributor License was in full force and effect at all  
27 times relevant to the charges brought in Accusation No. DCC24-0000404-INV and expired on  
28 June 27, 2024. The Distributor License has not been renewed. This lapse in licensure, pursuant

1 to Business and Professions Code section 26031, subdivision (d), does not deprive the  
2 Department of its authority to institute or continue this disciplinary proceeding.

3 3. On or about March 25, 2025, Respondent was served by Certified and First-Class  
4 Mail copies of the Accusation No. DCC24-0000404-INV, Statement to Respondent, Notice of  
5 Defense and Request for Discovery (Government Code sections 11507.5, 11507.6, and 11507.7)  
6 at Respondent's address of record which, pursuant to California Code of Regulations, title 4,  
7 section 15002, is required to be reported and maintained with the Department. Respondent's  
8 address of record was and is: 3595 Cadillac Ave, Suite 102, Costa Mesa, CA 92626.

9 4. On or about March 25, 2025, Respondent was served by Certified and First-Class  
10 Mail copies of the Accusation No. DCC24-0000404-INV, Statement to Respondent, Notice of  
11 Defense and Request for Discovery (Government Code sections 11507.5, 11507.6, and 11507.7)  
12 at the address for service of process for Respondent on file with the Department which was and  
13 is: 1102 El Prado Unit B, San Clemente, CA 92672.

14 5. On or about March 25, 2025, Respondent was served by Certified and First-Class  
15 Mail copies of the Accusation No. DCC24-0000404-INV, Statement to Respondent, Notice of  
16 Defense and Request for Discovery (Government Code sections 11507.5, 11507.6, and 11507.7)  
17 at a third address on file with the Department which was and is: 115 Bumblebee, Irvine, CA  
18 92618.

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

21 7. Government Code section 11506(c) states, in pertinent part:

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

27 8. The Department takes official notice of its records and the fact that Respondent failed  
28 to file a Notice of Defense within 15 days after service upon them of the Accusation, and  
therefore waived its right to a hearing on the merits of Accusation No. DCC24-0000404-INV.

///

1 9. California Government Code section 11520(a) states, in pertinent part:

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

5 10. Pursuant to its authority under Government Code section 11520, the Department finds  
6 Respondent is in default. The Department will take action without further hearing and, based on  
7 the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this  
8 matter, finds that the charges and allegations in Accusation No. DCC24-0000404-INV, are  
9 separately and severally, found to be true and correct by a preponderance of the evidence.

10 11. The Department finds that the actual costs for Enforcement are \$3,913.25 as of  
11 February 25, 2025.

12 **DETERMINATION OF ISSUES**

13 1. Based on the foregoing findings of fact, Respondent Dyrect #4 LLC with Mauricio  
14 Devadip Corona Garcia, Owner, has subjected its Distributor License No. C11-0001690-LIC to  
15 discipline.

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

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

- 20 a. Violation of Business and Professions Code section 26030, subdivisions (a) and (c),  
21 and Title 4 of the California Code of Regulations, section 15000.1, subdivision (c)  
22 [Failure to Conduct Commercial Cannabis Activities at the Licensed Premises];  
23 b. Violation of Business and Professions Code section 26030, subdivisions (a) and (c),  
24 and Title 4 of the California Code of Regulations, section 15000.7, subdivision (a)  
25 [Failure to Store Cannabis or Cannabis Products at the Licensed Premises];  
26  
27  
28

- 1 c. Violation of Business and Professions Code section 26030, subdivisions (a) and  
2 (c), and Title 4 of the California Code of Regulations, section 15047.2,  
3 subdivisions (b) through (d) [Failure to Accurately Enter Data into the CCTT  
4 System; Falsification of Information];
- 5 d. Violation of Business and Professions Code section 26030, subdivisions (a) and  
6 (c), and Title 4 of the California Code of Regulations, section 15049, subdivision  
7 (b) [Failure to Timely Record Commercial Cannabis Activities into the CCTT  
8 System];
- 9 e. Violation of Business and Professions Code section 26030, subdivision (f) [Failure  
10 to Comply with the Requirement of a Local Ordinance Regulating Commercial  
11 Cannabis Activity].

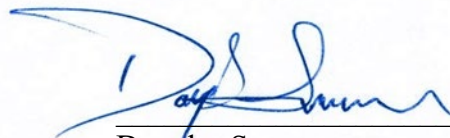
12 **ORDER**

13 IT SO ORDERED that Distributor License No. C11-0001690-LIC, issued to  
14 Respondent Dyrect #4 LLC with Mauricio Devadip Corona Garcia, Owner, is revoked.

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

19 This Decision shall become effective on September 5, 2025.

20 It is SO ORDERED, August 6, 2025.

21  
22 

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

26 Attachment:  
27 Exhibit A: Accusation

# Exhibit A

Accusation

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
3 State Bar No. 198769  
600 West Broadway, Suite 1800  
4 San Diego, CA 92101  
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E-mail: Harinder.Kapur@doj.ca.gov  
7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**DEPARTMENT OF CANNABIS CONTROL**  
10 **STATE OF CALIFORNIA**  
11

12 In the Matter of the Accusation Against:

Case No. DCC24-0000404-INV

13 **DYRECT #4 LLC;**  
**MAURICIO DEVADIP CORONA**  
14 **GARCIA and CHLOE ZHOU PARKER,**  
**OWNERS.**  
15 **3595 Cadillac Ave, Suite 102**  
**Costa Mesa, CA 92626**

**ACCUSATION**

16 **Cannabis - Distributor License**  
17 **No. C11-0001690-LIC**

18 Respondent.

19 **PARTIES**

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

23 2. On or about June 27, 2022, the Department issued Cannabis Distributor License  
24 Number C11-0001690-LIC to Dyrect #4 LLC; Chloe Zhou Parker, Owner.<sup>1</sup> (Respondent). The  
25 Distributor License was in full force and effect at all times relevant to the charges brought herein  
26

27 <sup>1</sup> On November 30, 2023, Parker submitted Modification Form DCC LIC 027 to the  
28 Department, seeking to include Mauricio Devadip Corona Garcia (Garcia) as an 80% owner and  
officer of the license. As of January 8, 2024, the Department approved the request, adjusting the  
ownership of the license to 20% for Chloe Zhou Parker (Parker) and 80% for Garcia.

1 and expired on June 27, 2024. The Cannabis - Distributor License No. C11-0001690-LIC has not  
2 been renewed as of the Accusation filing date.

### 3 **JURISDICTION**

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

7 4. Section 26010 of the Code states:

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

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

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

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

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

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

18 The department shall make and prescribe reasonable rules and regulations as  
19 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  
20 Division 3 of Title 2 of the Government Code....

21 8. Section 26031 of the Code states, in part:

22 (a) The department may suspend, revoke, place on probation with terms and  
23 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  
24 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  
25 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.

26 ...

27 (c) The department may take disciplinary action against a licensee for any  
28 violation of this division when the violation was committed by the licensee's officers,



1 directors, owners, agents, or employees while acting on behalf of the licensee or  
2 engaged in commercial cannabis activity.

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

11 9. Section 26034 of the Code states:

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

### 20 **STATUTORY PROVISIONS**

21 10. Section 26030 of the Code states:

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

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

26 ...

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

...

(f) Failure to comply with the requirement of a local ordinance regulating  
commercial cannabis activity....

### 23 **REGULATORY PROVISIONS**

24 11. Title 4 of the California Code of Regulations, section 15000.1, states:

25 ...

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

12. Title 4 of the California Code of Regulations, section 15000.7, states:

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

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

...

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

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

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

14. Title 4 of the California Code of Regulations, section 15049, states:

...

(b) Each of the following activities shall be recorded in the track and trace system within 24 hours of occurrence:

(1) Receipt of cannabis or cannabis products.

(2) Rejection of transferred cannabis or cannabis products....

### **LOCAL AUTHORITY**

15. The Costa Mesa Municipal Code, section 9-487, states:

No person may engage in any cannabis business or in any cannabis activity within the city including manufacturing, processing, laboratory testing, transporting, dispensing, distribution, or sale of cannabis or a cannabis product unless the person: (1) has a valid cannabis business permit from the city that authorizes the specific business and activity at specific location; (2) has a valid business license issued to the entity that is listed on the cannabis business permit; and (3) is currently in compliance with all other applicable state and local laws and regulations pertaining to the cannabis business and cannabis activity. All cannabis business permits shall include a copy of a written notice to any existing tenant of the proposed business premises from the owner of the property of the intent to file a cannabis business permit application for those premises.

(Ord. No. 16-15, § 4, 11-18-16; Ord. No. 18-04, § 2, 4-3-18; Ord. No. 21-09, § 3, 6-15-21; Ord. No. 2024-04, 5/7/2024)

## COST RECOVERY

16. 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.

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

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

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**FACTUAL ALLEGATIONS**

17. On or about February 22, 2024, Department staff conducted a regulatory compliance inspection at Respondent's licensed premises. Upon their arrival, Department staff made contact with individuals at the licensed premises and were advised that a non-cannabis commercial business (Company A) had been operating at the location since June 25, 2023. The manager of Company A confirmed that she had not seen any cannabis or cannabis products on the premises since its establishment. Department staff also noticed a City of Costa Mesa Business License Tax Certificate on display at the premises address that was issued to Company A and would expire on April 30, 2024. A visual walkthrough inspection of the premises address confirmed that Respondent was not operational at the licensed premises, that no cannabis or cannabis products were stored there, and that no commercial cannabis business was in operation at that location.

18. Department staff reviewed Respondent's METRC account on February 23, 2024, to ascertain Respondent's active inventory as of the inspection date. The METRC data revealed that, as of February 22, 2024, Respondent had approximately 24,263 active packages in its inventory. In addition, 8 originating transfers were recorded as "created" by Owner Mauricio Garcia between January 8, 2024, and February 13, 2024, from the licensed premises. A third report revealed that Respondent reported receipt of 1,243 transfers of cannabis or cannabis products between November 5, 2023, and February 22, 2024.

19. On March 4, 2024, Mauricio Garcia and Chloe Parker (Owners), submitted a request to update Owner Garcia's contact information.

20. On March 5, 2024, Department staff again reviewed Respondent's METRC account activity and noted that Respondent recorded an additional 103 transfers received between February 23, 2024, and March 3, 2024. Consequently, the Department placed an administrative hold on Respondent's METRC account. On March 6, 2024, the Department's licensing system updated Respondent's contact information and inadvertently lifted the initial administrative hold.

21. On March 21, 2024, another review of Respondent's METRC account activity was conducted. Department staff discovered that Respondent had reported receiving an additional 176 transfers since March 5, 2024, and there were still 155 incoming transfers that were pending

1 reporting in METRC as received or rejected. As of March 21, 2024, Respondent had a total of  
2 29,687 active packages reported in its METRC account. Department staff again placed an  
3 administrative hold on Respondent's METRC account.

4 22. On March 21, 2024, employees of the City of Costa Mesa confirmed that Respondent  
5 was not fully permitted by the city and did not possess the requisite cannabis business permit to  
6 operate. City staff also confirmed that Company A was issued its business license on June 5,  
7 2023.

8 23. On March 22, 2024, Department staff confirmed that the premises diagram,  
9 previously submitted by Respondent, as part of the licensing process, indicated the licensee's  
10 address as the licensed premises. In addition, the premises address listed on Respondent's most  
11 recent Department-issued license was identical to the location visited by Department staff on  
12 February 22, 2024.

### 13 **FIRST CAUSE FOR DISCIPLINE**

14 (Failure to Conduct Commercial Cannabis Activities at the Licensed Premises)

15 24. Respondent is further subject to disciplinary action under Code section 26030,  
16 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
17 Regulations, section 15000.1, subdivision (c), requiring a licensee to conduct commercial  
18 cannabis activities at its licensed premises as particularly alleged in paragraphs 17 through 23,  
19 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

### 20 **SECOND CAUSE FOR DISCIPLINE**

21 (Failure to Store Cannabis or Cannabis Products at the Licensed Premises)

22 25. Respondent is further subject to disciplinary action under Code section 26030,  
23 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
24 Regulations, section 15000.7, subdivision (a), requiring a licensee to store cannabis or cannabis  
25 products within the licensed premises as more particularly alleged in paragraphs 17 through 23,  
26 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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**THIRD CAUSE FOR DISCIPLINE**

(Failure to Accurately Enter Data into the CCTT System; Falsification of Information)

26. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15047.2, subdivisions (b) through (d), requiring a licensee to accurately record all of its commercial cannabis activities into the CCTT system and prohibiting the intentional misrepresentation or falsification of information entered into the CCTT system as more particularly alleged in paragraphs 17 through 23, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**FOURTH CAUSE FOR DISCIPLINE**

(Failure to Timely Record Commercial Cannabis Activities into the CCTT System)

27. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15049, subdivision (b), requiring a licensee to record the receipt or rejection of transferred cannabis or cannabis product into the CCTT system within 24 hours of occurrence as more particularly alleged in paragraph 21, above, which is hereby incorporated by reference and realleged as if fully set forth herein.

**FIFTH CAUSE FOR DISCIPLINE**

(Failure to Comply with the Requirement of a Local Ordinance  
Regulating Commercial Cannabis Activity)

28. Respondent is further subject to disciplinary action under Code section 26030, subdivision (f), in that it failed to comply with Costa Mesa Municipal Code section 9-487, requiring: (1) a valid cannabis business permit from the city that authorizes the specific business and activity at specific location; (2) a valid business license issued to the entity that is listed on the cannabis business permit; and (3) compliance with all other applicable state and local laws and regulations pertaining to the cannabis business and cannabis activity. Respondent's noncompliance is more particularly alleged in paragraphs 17 through 23, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**PRAYER**

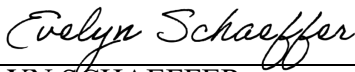
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director issue a decision:

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Distributor License Number C11-0001690-LIC issued to Dyrect #4 LLC (Respondent) with Mauricio Devadip Corona Garcia and Chloe Zhou Parker as Owners;

2. Ordering Respondent Dyrect #4 LLC (Respondent) with Mauricio Devadip Corona Garcia and Chloe Zhou Parker as Owners, 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: \_\_\_\_\_

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

SA2024801866  
Accusation - Dyrect #4.docx

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

In the Matter of the Accusation Against:

**DYRECT #4 LLC; MAURICIO DEVADIP  
CORONA GARCIA, OWNER,  
3595 Cadillac Ave, Suite 102  
Costa Mesa, CA 92626**

**Cannabis Distributor License  
No. C11-0001690-LIC**

Respondent.

Case No. DCC24-0000404-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. DCC24-0000404-INV, statement to respondent, notice of defense (two blank copies), request for discovery, proofs of service;

**Exhibit 2:** License History Certification for Dyrect #4 LLC with Mauricio Devadip Corona Garcia, Owner, Distributor License No. C11-0001690-LIC;

**Exhibit 3:** Certification of Costs by Department for Investigation and Enforcement in Case No. DCC24-0000404-INV dated February 25, 2025;

**Exhibit 4:** Certification of Costs by California Department of Justice for Prosecution in Case No. DCC24-0000404-INV dated July 1, 2025;

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



**Exhibit 6:** Investigative Report (without attachments).

Dated: August 4, 2025

Respectfully submitted,

ROB BONTA  
Attorney General of California



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

# Exhibit 1

Accusation No. DCC24-0000404-INV  
Statement to Respondent  
Notice of Defense  
Request for Discovery, Proofs of Service

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  
9 **BEFORE THE**  
**DEPARTMENT OF CANNABIS CONTROL**  
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13 **DYRECT #4 LLC;**  
**MAURICIO DEVADIP CORONA**  
14 **GARCIA AND CHLOE ZHOU PARKER,**  
**OWNERS.**

15 **3595 Cadillac Ave, Suite 102**  
16 **Costa Mesa, CA 92626**

17 **Cannabis - Distributor License**  
18 **No. C11-0001690-LIC**

19  
20 Respondent.

Case No. DCC24-0000404-INV

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

21  
22 TO RESPONDENT:

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

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

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

4  
5 **Harinder K. Kapur**  
6 **Senior Assistant Attorney General**  
7 **600 West Broadway, Suite 1800**  
8 **San Diego, CA 92101**  
9 **P.O. Box 85266**  
10 **San Diego, CA 92186-5266**

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

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

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

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

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

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

#### 27 **NOTICE REGARDING STIPULATED SETTLEMENTS**

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

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

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

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

10  
11 Dated: February 25, 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  
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  
9 **BEFORE THE**  
**DEPARTMENT OF CANNABIS CONTROL**  
10 **STATE OF CALIFORNIA**  
11

12 In the Matter of the Accusation Against:

Case No. DCC24-0000404-INV

13 **DYRECT #4 LLC;**  
**MAURICIO DEVADIP CORONA**  
14 **GARCIA and CHLOE ZHOU PARKER,**  
**OWNERS.**  
15 **3595 Cadillac Ave, Suite 102**  
**Costa Mesa, CA 92626**

**ACCUSATION**

16 **Cannabis - Distributor License**  
17 **No. C11-0001690-LIC**

18 Respondent.

19 **PARTIES**

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

23 2. On or about June 27, 2022, the Department issued Cannabis Distributor License  
24 Number C11-0001690-LIC to Dyrect #4 LLC; Chloe Zhou Parker, Owner.<sup>1</sup> (Respondent). The  
25 Distributor License was in full force and effect at all times relevant to the charges brought herein  
26

27 <sup>1</sup> On November 30, 2023, Parker submitted Modification Form DCC LIC 027 to the  
28 Department, seeking to include Mauricio Devadip Corona Garcia (Garcia) as an 80% owner and  
officer of the license. As of January 8, 2024, the Department approved the request, adjusting the  
ownership of the license to 20% for Chloe Zhou Parker (Parker) and 80% for Garcia.

1 and expired on June 27, 2024. The Cannabis - Distributor License No. C11-0001690-LIC has not  
2 been renewed as of the Accusation filing date.

### 3 **JURISDICTION**

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

7 4. Section 26010 of the Code states:

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

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

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

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

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

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

18 The department shall make and prescribe reasonable rules and regulations as  
19 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  
20 Division 3 of Title 2 of the Government Code....

21 8. Section 26031 of the Code states, in part:

22 (a) The department may suspend, revoke, place on probation with terms and  
23 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  
24 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  
25 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.

26 ...

27 (c) The department may take disciplinary action against a licensee for any  
28 violation of this division when the violation was committed by the licensee's officers,

1 directors, owners, agents, or employees while acting on behalf of the licensee or  
2 engaged in commercial cannabis activity.

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

11 9. Section 26034 of the Code states:

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

### 20 **STATUTORY PROVISIONS**

21 10. Section 26030 of the Code states:

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

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

26 ...

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

...

(f) Failure to comply with the requirement of a local ordinance regulating  
commercial cannabis activity....

### 23 **REGULATORY PROVISIONS**

24 11. Title 4 of the California Code of Regulations, section 15000.1, states:

25 ...

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



12. Title 4 of the California Code of Regulations, section 15000.7, states:

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

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

...

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

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

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

14. Title 4 of the California Code of Regulations, section 15049, states:

...

(b) Each of the following activities shall be recorded in the track and trace system within 24 hours of occurrence:

(1) Receipt of cannabis or cannabis products.

(2) Rejection of transferred cannabis or cannabis products....

### **LOCAL AUTHORITY**

15. The Costa Mesa Municipal Code, section 9-487, states:

No person may engage in any cannabis business or in any cannabis activity within the city including manufacturing, processing, laboratory testing, transporting, dispensing, distribution, or sale of cannabis or a cannabis product unless the person: (1) has a valid cannabis business permit from the city that authorizes the specific business and activity at specific location; (2) has a valid business license issued to the entity that is listed on the cannabis business permit; and (3) is currently in compliance with all other applicable state and local laws and regulations pertaining to the cannabis business and cannabis activity. All cannabis business permits shall include a copy of a written notice to any existing tenant of the proposed business premises from the owner of the property of the intent to file a cannabis business permit application for those premises.

(Ord. No. 16-15, § 4, 11-18-16; Ord. No. 18-04, § 2, 4-3-18; Ord. No. 21-09, § 3, 6-15-21; Ord. No. 2024-04, 5/7/2024)

**COST RECOVERY**

16. 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.

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

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

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**FACTUAL ALLEGATIONS**

17. On or about February 22, 2024, Department staff conducted a regulatory compliance inspection at Respondent's licensed premises. Upon their arrival, Department staff made contact with individuals at the licensed premises and were advised that a non-cannabis commercial business (Company A) had been operating at the location since June 25, 2023. The manager of Company A confirmed that she had not seen any cannabis or cannabis products on the premises since its establishment. Department staff also noticed a City of Costa Mesa Business License Tax Certificate on display at the premises address that was issued to Company A and would expire on April 30, 2024. A visual walkthrough inspection of the premises address confirmed that Respondent was not operational at the licensed premises, that no cannabis or cannabis products were stored there, and that no commercial cannabis business was in operation at that location.

18. Department staff reviewed Respondent's METRC account on February 23, 2024, to ascertain Respondent's active inventory as of the inspection date. The METRC data revealed that, as of February 22, 2024, Respondent had approximately 24,263 active packages in its inventory. In addition, 8 originating transfers were recorded as "created" by Owner Mauricio Garcia between January 8, 2024, and February 13, 2024, from the licensed premises. A third report revealed that Respondent reported receipt of 1,243 transfers of cannabis or cannabis products between November 5, 2023, and February 22, 2024.

19. On March 4, 2024, Mauricio Garcia and Chloe Parker (Owners), submitted a request to update Owner Garcia's contact information.

20. On March 5, 2024, Department staff again reviewed Respondent's METRC account activity and noted that Respondent recorded an additional 103 transfers received between February 23, 2024, and March 3, 2024. Consequently, the Department placed an administrative hold on Respondent's METRC account. On March 6, 2024, the Department's licensing system updated Respondent's contact information and inadvertently lifted the initial administrative hold.

21. On March 21, 2024, another review of Respondent's METRC account activity was conducted. Department staff discovered that Respondent had reported receiving an additional 176 transfers since March 5, 2024, and there were still 155 incoming transfers that were pending

1 reporting in METRC as received or rejected. As of March 21, 2024, Respondent had a total of  
2 29,687 active packages reported in its METRC account. Department staff again placed an  
3 administrative hold on Respondent's METRC account.

4 22. On March 21, 2024, employees of the City of Costa Mesa confirmed that Respondent  
5 was not fully permitted by the city and did not possess the requisite cannabis business permit to  
6 operate. City staff also confirmed that Company A was issued its business license on June 5,  
7 2023.

8 23. On March 22, 2024, Department staff confirmed that the premises diagram,  
9 previously submitted by Respondent, as part of the licensing process, indicated the licensee's  
10 address as the licensed premises. In addition, the premises address listed on Respondent's most  
11 recent Department-issued license was identical to the location visited by Department staff on  
12 February 22, 2024.

### 13 **FIRST CAUSE FOR DISCIPLINE**

14 (Failure to Conduct Commercial Cannabis Activities at the Licensed Premises)

15 24. Respondent is further subject to disciplinary action under Code section 26030,  
16 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
17 Regulations, section 15000.1, subdivision (c), requiring a licensee to conduct commercial  
18 cannabis activities at its licensed premises as particularly alleged in paragraphs 17 through 23,  
19 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

### 20 **SECOND CAUSE FOR DISCIPLINE**

21 (Failure to Store Cannabis or Cannabis Products at the Licensed Premises)

22 25. Respondent is further subject to disciplinary action under Code section 26030,  
23 subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of  
24 Regulations, section 15000.7, subdivision (a), requiring a licensee to store cannabis or cannabis  
25 products within the licensed premises as more particularly alleged in paragraphs 17 through 23,  
26 above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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**THIRD CAUSE FOR DISCIPLINE**

(Failure to Accurately Enter Data into the CCTT System; Falsification of Information)

26. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15047.2, subdivisions (b) through (d), requiring a licensee to accurately record all of its commercial cannabis activities into the CCTT system and prohibiting the intentional misrepresentation or falsification of information entered into the CCTT system as more particularly alleged in paragraphs 17 through 23, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**FOURTH CAUSE FOR DISCIPLINE**

(Failure to Timely Record Commercial Cannabis Activities into the CCTT System)

27. Respondent is further subject to disciplinary action under Code section 26030, subdivisions (a) and (c), in that it failed to comply with Title 4 of the California Code of Regulations, section 15049, subdivision (b), requiring a licensee to record the receipt or rejection of transferred cannabis or cannabis product into the CCTT system within 24 hours of occurrence as more particularly alleged in paragraph 21, above, which is hereby incorporated by reference and realleged as if fully set forth herein.

**FIFTH CAUSE FOR DISCIPLINE**

(Failure to Comply with the Requirement of a Local Ordinance  
Regulating Commercial Cannabis Activity)

28. Respondent is further subject to disciplinary action under Code section 26030, subdivision (f), in that it failed to comply with Costa Mesa Municipal Code section 9-487, requiring: (1) a valid cannabis business permit from the city that authorizes the specific business and activity at specific location; (2) a valid business license issued to the entity that is listed on the cannabis business permit; and (3) compliance with all other applicable state and local laws and regulations pertaining to the cannabis business and cannabis activity. Respondent's noncompliance is more particularly alleged in paragraphs 17 through 23, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

**PRAYER**

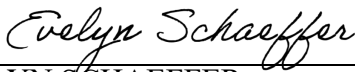
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director issue a decision:

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis - Distributor License Number C11-0001690-LIC issued to Dyrect #4 LLC (Respondent) with Mauricio Devadip Corona Garcia and Chloe Zhou Parker as Owners;

2. Ordering Respondent Dyrect #4 LLC (Respondent) with Mauricio Devadip Corona Garcia and Chloe Zhou Parker as Owners, 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: \_\_\_\_\_

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

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Accusation - Dyrect #4.docx

1 ROB BONTA  
Attorney General of California  
2 HARINDER K. KAPUR  
Senior Assistant Attorney General  
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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:  
12 **DYRECT #4 LLC;**  
13 **MAURICIO DEVADIP CORONA**  
14 **GARCIA AND CHLOE ZHOU PARKER,**  
15 **OWNERS.**  
Respondent.

Case No. DCC24-0000404-INV  
**REQUEST FOR DISCOVERY**

16 TO RESPONDENT:

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

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

- 23 1. Provide the names and addresses of witnesses to the extent known to the Respondent,  
24 including, but not limited to, those intended to be called to testify at the hearing, and  
25 2. Provide an opportunity for the Complainant to inspect and make a copy of any of the  
26 following in the possession or custody or under control of the Respondent:  
27 a. A statement of a person, other than the Respondent, named in the  
28 initial administrative pleading, or in any additional pleading, when it is claimed that

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  
12       Dated: February 25, 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:

**DYRECT #4 LLC;  
MAURICIO DEVADIP CORONA  
GARCIA AND CHLOE ZHOU PARKER,  
OWNERS.**

Respondent.

Case No. DCC24-0000404-INV

**NOTICE OF DEFENSE**

(Gov. Code §§ 11505 and 11506)

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

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

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

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail

**Check one box:**

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

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

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

**Check box if applicable:**

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

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at <https://cannabis.ca.gov>.

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

In the Matter of the Accusation Against:

**DYRECT #4 LLC;  
MAURICIO DEVADIP CORONA  
GARCIA AND CHLOE ZHOU PARKER,  
OWNERS.**

Respondent.

Case No. DCC24-0000404-INV

**NOTICE OF DEFENSE**

(Gov. Code §§ 11505 and 11506)

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

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail

**Check one box:**

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

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

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

**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>.

**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 EMAIL, CERTIFIED MAIL**  
**AND FIRST CLASS MAIL**  
(Separate Mailings)

Case Name: **In the Matter of the Accusation against Dyrect #4 LLC**

No.: **DCC24-0000404-INV**

I declare:

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

On February 25, 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 a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 Copies); and GOVERNMENT CODE SECTION 11507.5, 11507.6 and 11507.7** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 600 West Broadway, Suite 1800, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

Dyrect #4 LLC;  
Mauricio Devadip Corona Garcia  
And Chloe Zhou Parker, Owners  
3595 Cadillac Ave, Suite 102  
Costa Mesa, CA 92626

**Certified Article Number**

9414 7266 9904 2232 2751 83

**SENDER'S RECORD**

Chloe Zhou Parker  
115 Bumblebee  
Irvine, CA 92618  
Email address: [chloe@wooza.com](mailto:chloe@wooza.com)

**Certified Article Number**

9414 7266 9904 2232 2751 76

**SENDER'S RECORD**

Ryan Maddocks  
Agent for Service of Process  
1102 El Prado Unit B  
San Clemente, CA 92672  
Email address: [ryan@greencp.com](mailto:ryan@greencp.com)

**Certified Article Number**

9414 7266 9904 2232 2751 90

**SENDER'S RECORD**



**EMAIL SERVICE**

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 February 25, 2025, at San Diego, California.

\_\_\_\_\_  
N. Amansec  
Declarant

\_\_\_\_\_  
*N. Amansec*  
Signature

**MAIL SERVICE**

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 February 25, 2025, at San Diego, California.

\_\_\_\_\_  
S. Garcia  
Declarant

\_\_\_\_\_  
*S. Garcia*  
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 Distributor License Adult-Use and Medicinal

**Business Name:**

Dyrect #4 LLC

Dyrect #4 LLC

**License Number:** C11-0001690-LIC

**License Type:** Distributor

The license authorizes Dyrect #4 LLC to engage in commercial cannabis Distribution at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

**Premises Address:**

3595 CADILLAC AVE, SUITE 102  
COSTA MESA, CA 92626-1450

**APN:**

139-651-05  
COSTA MESA

**Valid:** 6/27/2022

**Expires:** 6/27/2024

Scan to verify this  
license.



Non-Transferable

Post in Public View

# Scan to verify this license.



**Valid:**

6/27/2022

**Expires:**

6/27/2024

**License No:**

C11-0001690-LIC

**Legal Business Name:**

Dyrect #4 LLC

Dyrect #4 LLC

**Premises Address:**

3595 CADILLAC AVE, SUITE 102  
COSTA MESA, CA 92626-1450

**APN:**

139-651-05  
COSTA MESA

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** using license number C11-0001690-LIC.

# Exhibit 3

Certification of Costs (Department of Cannabis Control)

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

In the Matter of the Accusation Against:

**DYRECT #4 LLC; MAURICIO DEVADIP  
CORONA GARCIA, OWNER**

**3595 Cadillac Ave, Suite 102 Costa Mesa,  
CA 92626**

**Cannabis - Distributor License No. C11-  
0001690-LIC**

Respondent.

Case No. DCC24-0000404-INV

**DECLARATION OF JACOB NUCHOLS  
REGARDING INVESTIGATIVE  
ACTIVITY**

I, Jacob Nuchols, declare and certify as follows:

1. I am employed as a Supervising Special Investigator I (SSI I) within the Investigative Services Branch (ISB) of the Compliance Division of the Department of Cannabis Control (Department).

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

3. The following list of Special Investigators (SI) were assigned to the investigation of this case, which was opened by the Department's Compliance Division on or about February 22, 2024: Jacob Nuchols, Supervising Special Investigator (SSI); Aaron Lew, (SI); Eric Kinney, (SI).

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

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

5 5. The investigative activity summary entitled Dyrect #4 LLC Certification of Cost  
6 Recovery was obtained from the Department's case management system and includes the details  
7 of tasks performed by Supervising and or Special Investigators as maintained in the Department's  
8 case management system. The costs related to investigative activity include field time, research  
9 and report writing, meetings, and use of state vehicles. I hereby certify that the Dyrect #4, LLC  
10 Certification of Cost Recovery, attached hereto and herein incorporated by reference is a true and  
11 correct copy of the investigative activity for this case. The investigative activity summary  
12 encompasses the total hours spent by the Department's ISB through June 27, 2025. The  
13 investigative activity summary does not include tasks performed after this date.

14 6. I certify pursuant to the provisions of Business and Professions Code section  
15 26031.1 that to the best of my knowledge the costs of investigative services set forth in this  
16 declaration are correct and were necessarily incurred in this case. The total hours of investigative  
17 activity and rates applicable to the above-entitled case are as follows:

18 a) Special Investigator Field Time:

19 Rate per hour: \$101.00 multiplied by 9.5 hours = \$959.50

20 b) Research and Report Writing:

21 Rate per hour: \$101.00 multiplied by 17 hours = \$1,717.00

22  
23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct and that this declaration was executed in Riverside County on  
25 July 1, 2025.

26 Nuchols,  
27 Jacob@Cannabis

28 Jacob Nuchols  
*Declarant*

Digitally signed by Nuchols,  
Jacob@Cannabis  
Date: 2025.07.01 09:14:32 -07'00'

	A	B	C	D	E	F	G	H
1	Last Name	First Name	Hourly Rate	Field Time	Research and Report	Meetings	Total Hours	Total Expense
2	Supervising Special Investigator I, Nuchols	Jacob	\$101.00	0	1	0	1	\$101.00
3	Special Investigator, Lew	Aaron	\$101.00	6	16	0	22	\$2,222.00
4	Special Investigator, Kinney	Eric	\$101.00	3.5	0	0	3.5	\$353.50
5					0	0	0	\$0.00
6					0	0	0	\$0.00
7	Total Personnel Services							\$2,676.50
8								
9	Total Personnel Services and Operating Expense							\$2,676.50
10								
11								
12								
13								
14								
15								
16								



# Exhibit 4

Certification of Costs – California Department of Justice

(DYRECT #4 LLC; MAURICIO DEVADIP CORONA GARCIA, OWNER.)

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

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

11 In the Matter of the Accusation Against:

Case No. DCC24-0000404-INV

12 **DYRECT #4 LLC; MAURICIO DEVADIP**  
13 **CORONA GARCIA, OWNER.**

**CERTIFICATION OF**  
**PROSECUTION COSTS:**  
**DECLARATION OF HARINDER K.**  
**KAPUR**

14 Respondent.

[Business and Professions Code section  
26031.1]

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

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

24 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance  
25 Division of the Department of Cannabis Control, in this action. This case was referred to the  
26 Office on or about May 21, 2024.

27 3. Our Office's computerized case management system reflects that the following  
28 persons have also performed tasks related to this matter: Harinder Kapur, Senior Assistant

1 Attorney General; Helen Koh, Senior Legal Analyst; and Robert T. White, Deputy Attorney  
2 General.

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

8 5. On July 1, 2025, I requested a billing summary for this case from the Accounting  
9 Department of the DOJ. In response, on July 1, 2025, I received a document entitled "Cost of  
10 Suit Summary." I hereby certify that the Cost of Suit Summary, attached hereto as Exhibit A, and  
11 herein incorporated by reference, is a true and correct copy of the billing summary for this matter  
12 that I received from the Accounting Department. The summary includes the billing costs incurred  
13 by me, as well as other professionals of the DOJ who worked on the matter. The billing summary  
14 is comprehensive of the charges by the Office to the Department of Cannabis Control through  
15 July 1, 2025.

16 6. Based upon the time reported through July 1, 2025, as set forth in Exhibit A, DOJ has  
17 billed the Department of Cannabis Control \$4,358.00 for the time spent working on the above  
18 entitled case.

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

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

23 Executed on July 1, 2025, in the City of San Diego, California.

24 

25 HARINDER K. KAPUR  
26 Senior Assistant Attorney General  
27 Declarant

28 SA2024801866  
Declaration of Costs.docx

## **Exhibit A**



Cost of Suit Summary

As of Jul 1, 2025

MatterID: SA2024801866  
Description: Dyrect #4 LLC (ACC)

Date Opened: May 21, 2024

Total Legal Costs: \$4,358.00  
Cost of Suit: \$0.00  
Grand Total: \$4,358.00

Totals include WIP time.

Rate	Hrs Wrkd	Amount
Matter Time Activity Summary		
Attorney		
2024-2025		
\$228.00	7.00	\$1,596.00
Total For: 2024-2025		\$1,596.00
2023-2024		
\$220.00	1.00	\$220.00
Total For: 2023-2024		\$220.00
Total for: Attorney		\$1,816.00
Paralegal		
2024-2025		
\$213.00	10.25	\$2,183.25
Total For: 2024-2025		\$2,183.25
2023-2024		
\$205.00	1.75	\$358.75
Total For: 2023-2024		\$358.75
Total for: Paralegal		\$2,542.00
Total Legal Costs		\$4,358.00

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



# Matter Time Activity By Professional Type

As of Jul 1, 2025

Matter ID: SA2024801866					Date Opened: 05/21/2024				
Description: Dyrect #4 LLC (ACC)									
Professional Type: Attorney									
Fiscal Year: 2024									
Professional: Gregory M. Cribbs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605321904	11/22/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		11/30/24
605335713	12/5/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		12/31/24
Gregory M. Cribbs Totals:					0.50		\$114.00		
Professional: Harinder K. Kapur									
802999830	1/3/25	CV-CCS:290	02668	Supervisory Review	0.75	\$228.00	\$171.00		1/31/25
803048232	2/20/25	CV-CCS:290	02668	Pleading Preparation	0.50	\$228.00	\$114.00		2/28/25
803098777	4/9/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		4/30/25
803125326	5/2/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$228.00	\$171.00		5/31/25
803148159	5/26/25	CV-CCS:290	02668	Contract/Document Preparation	0.25	\$228.00	\$57.00		5/31/25
Harinder K. Kapur Totals:					2.50		\$570.00		
Professional: Joshua B. Eisenberg									
306915821	7/10/24	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		7/31/24
Joshua B. Eisenberg Totals:					0.25		\$57.00		
Professional: Robert Tomlin White									
802845271	8/2/24	CV-CCS:290	02668	Case Evaluation/Assessment	1.00	\$228.00	\$228.00		8/31/24
802858544	8/9/24	CV-CCS:290	02668	Analysis/Strategy	1.50	\$228.00	\$342.00		8/31/24
802863678	8/20/24	CV-CCS:290	02668	Pleading Preparation	1.25	\$228.00	\$285.00		8/31/24
Robert Tomlin White Totals:					3.75		\$855.00		
2024 Totals:					7.00		\$1,596.00		
Fiscal Year: 2023									
Professional: Robert Tomlin White									
802801665	6/17/24	CV-CCS:290	02668	Case Evaluation/Assessment	1.00	\$220.00	\$220.00		6/30/24
Robert Tomlin White Totals:					1.00		\$220.00		
2023 Totals:					1.00		\$220.00		
Attorney Totals:					8.00		\$1,816.00		



# Matter Time Activity By Professional Type

As of Jul 1, 2025

Matter ID: SA2024801866					Date Opened: 05/21/2024				
Description: Dyrect #4 LLC (ACC)									
Professional Type: Paralegal									
Fiscal Year: 2024									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
802909611	10/3/24	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		10/31/24
802992505	12/23/24	CV-CCS:290	02668	Pleading Preparation	2.25	\$213.00	\$479.25		12/31/24
802992696	12/24/24	CV-CCS:290	02668	Pleading Preparation	3.50	\$213.00	\$745.50		12/31/24
802998492	1/2/25	CV-CCS:290	02668	Pleading Preparation	2.25	\$213.00	\$479.25		1/31/25
802999909	1/3/25	CV-CCS:290	02668	Pleading Preparation	0.25	\$213.00	\$53.25		1/31/25
803033740	2/5/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		2/28/25
803052334	2/24/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$213.00	\$159.75		2/28/25
803083204	3/25/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		3/31/25
803091570	4/1/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		4/30/25
803142238	5/19/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		5/31/25
Helen Koh Totals:					10.25		\$2,183.25		
2024 Totals:					10.25		\$2,183.25		
Fiscal Year: 2023									
Professional: Helen Koh									
802768724	5/21/24	CV-CCS:290	02668	Case Management	1.25	\$205.00	\$256.25		5/31/24
802782698	6/3/24	CV-CCS:290	02668	Case Management	0.25	\$205.00	\$51.25		6/30/24
802787491	6/7/24	CV-CCS:290	02668	Case Management	0.25	\$205.00	\$51.25		6/30/24
Helen Koh Totals:					1.75		\$358.75		
2023 Totals:					1.75		\$358.75		
Paralegal Totals:					12.00		\$2,542.00		
SA2024801866 Totals:					20.00		\$4,358.00		

# Exhibit 5

Certified Return Receipts from USPS



Harinder K. Kapur  
Office of the Attorney General  
600 West Broadway, Suite 1800  
San Diego, CA 92101  
P.O. Box 85266  
San Diego, CA 92186-5266

CERTIFIED MAIL®



9414 7266 9904 2232 2751 76



US POSTAGE<sup>®</sup> MARTINEY BOWES



ZIP 92101 \$011.54<sup>0</sup>  
02 4W  
0000385971 FEB 25 2025


NIXIE FEB 1 9 10 AM '25  
RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD  
BC: 92186326666 2347N971220-11447

Chloe Zhou Parker  
115 Bumblebee  
Irvine, CA 92618

N/2  
1882  
3/3  
14



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

<b>C</b> FOLD AND TEAR THIS WAY →  Thank you for using Return Receipt Service  RETURN RECEIPT REQUESTED USPS® MAIL CARRIER DETACH ALONG PERFORATION	<b>Return Receipt (Form 3811) Barcode</b>		<b>COMPLETE THIS SECTION ON DELIVERY</b>	
	 9590 9266 9904 2232 2751 79		A. Signature <input type="checkbox"/> Agent <b>X</b> <input type="checkbox"/> Addressee	
1. Article Addressed to:  Chloe Zhou Parker 115 Bumblebee Irvine, CA 92618		B. Received by (Printed Name)		C. Date of Delivery
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
2. Certified Mail (Form 3800) Article Number  9414 7266 9904 2232 2751 76		3. Service Type: <input checked="" type="checkbox"/> Certified Mail		Reference Information <b>DIRECT (Acc/Pkt) SA2024801866</b> <b>Harinder K. Kapur</b>
		PS Form 3811, Facsimile, Julv 2015		Domestic Return Receipt

Thank you for using Return Receipt Service



Harinder K  
Office of the  
600 West 1  
San Diego  
P.O. Box 8  
San Diego

MIXIE 910 72 1 7203/21/25  
RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD  
BC: 9218632666 2347N080152-00486



US POSTAGE IM PITNEY BOWES

ZIP 92401 \$002.59<sup>0</sup>  
02 4W  
0000385971 FEB. 25. 2025

Mountain Valley PND 02A

THU 27 FEB 2025 PM

Ryan Maddocks  
Agent for Service of Process  
1102 El Prado Unit B  
San Clemente, CA 92672

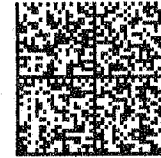
Harinder K. Kar  
Office of the A  
600 West Broa  
San Diego, CA  
P.O. Box 85266  
San Diego, CA 92186-5266

CERTIFIED MAIL

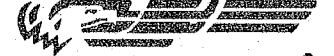
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	 9590 9266 9904 2232 2751 93		A. Signature <input type="checkbox"/> Agent <b>X</b> <input type="checkbox"/> Addressee		
	1. Article Addressed to:  Ryan Maddocks Agent for Service of Process 1102 El Prado Unit B San Clemente, CA 92672		B. Received by (Printed Name)		C. Date of Delivery
			D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
2. Certified Mail (Form 3800) Article Number  9414 7266 9904 2232 2751 90		3. Service Type: <input checked="" type="checkbox"/> Certified Mail		Reference Information <b>DIRECT (Acc/Pkt) SA2024801866</b> <b>Harinder K. Kapur</b>	
PS Form 3811, Facsimile, July 2015		Domestic Return Receipt			

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# Exhibit 6

Investigative Report (without attachments)

# INVESTIGATION REPORT

STATE OF CALIFORNIA



Department of  
Cannabis Control  
CALIFORNIA



## CASE INFORMATION

Case Number <b>DCC24-0000404-INV</b>	Date Received <b>02/22/2024</b>
License Number <b>C11-0001690-LIC (Annual)</b>	Legal Business Name of Licensee or Unlicensed Party <b>Dyrect #4 LLC</b>
DBA <b>N/A</b>	Premises Address <b>3595 Cadillac Ave. suite #102 Costa Mesa, CA 92626</b>
Business Phone Number <b>(949) 396-9999</b>	Author's Name <b>Aaron Lew #4028</b>
Date of Incident <b>02/22/2024</b>	Location of Incident <b>3595 Cadillac Ave. Costa Mesa, CA 92626</b>

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

Name (First, Middle, Last) <b>Mauricio Devadip, Corona Garcia</b>	Title <b>Owner/Officer</b>
Address (include street, city, state, and zip code) <b>617 Sonoma Ct. Ontario, CA 91762</b>	
E-mail Address <b>mauricoagarcia289@gmail.com</b>	Phone Number <b>(626) 696-5232</b>

### Miscellaneous Information

Mauricio Garcia is 80% owner and officer of C11-0001690-LIC

Chloe Zhou Parker is 20% owner and controlling manager of C11-0001690-LIC  
115 Bumblebee, Irvine, CA 92618  
[Chloe@wooza.com](mailto:Chloe@wooza.com) / [chloe@mydyrect.com](mailto:chloe@mydyrect.com)  
(949) 396-9999

## SUMMARY

During a compliance inspection on February 22, 2024, conducted by the California Department of Cannabis Control at Dyrect #4, LLC (licensee), it was revealed that Designers Moving Service, Inc. (DMS), a non-cannabis commercial business, had occupied the premises since June 25, 2023. Special Investigators confirmed the absence of any commercial cannabis activities on the licensed premises. Despite this, the licensee's Metrc account indicated around 24,263 active packages in inventory, eight originating transfers from the premises, and 1,243 transfers reported as "received" by the licensee between November 15, 2023, and February 22, 2024. By March 21, 2024, the licensee had reported a total of 29,687 active packages in their Metrc inventory, leading the department to place an administrative hold on the license's Metrc account.



## BACKGROUND

The licensee was issued a provisional license # C11-0001690-LIC (distribution) on June 27, 2022, which was transitioned to an annual license in November of 2023. The annual license expires June 27, 2024.

From June 27, 2022, to November 2023, Chloe Zhou Parker (Parker) served as the sole owner and controlling managing of Dyrect #4, LLC. On November 30, 2023, Parker submitted Modification Form DCC LIC 027 to the Department's licensing branch, seeking to include Mauricio Devadip Corona Garcia (Garcia) as an 80% owner and officer of the license. As of January 8, 2024, the Department approved the request, adjusting the ownership of the license to 20% for Parker and 80% for Garcia.

Since being issued, the license has not received any complaints or undergone any regulatory compliance inspections.

## CASE NARRATIVE

On February 22, 2024, a compliance inspection took place at Dyrect #4, LLC (licensee), located at 3595 Cadillac Ave. suite #102 Costa Mesa, CA 92626, (premises) conducted by the California Department of Cannabis Control (Department) Special Investigator's (SI) Eric Kinney (Kinney), and I, SI Aaron Lew. Upon arrival at the premises, I performed a drive-by inspection and identified suite 102. I noticed that the rear roll-up door of the business was open, and approximately four males were working outside. SI Kinney and I approached one of the male workers to inquire about the whereabouts of the licensee. However, the male informed us that the premises were currently occupied by his employer, a company called Designers Moving Service, Inc. (DMS). He directed us inside the premises where I had the opportunity to meet and interview DMS' business manager, Dianne Schouman (Schouman) (**Attachment A**). According to Schouman, DMS operates as a company specializing in commercial and residential moving and delivery services, owned by Jesus Ortega. DMS has been conducting business at the location since June 25, 2023, and asserts that no cannabis or cannabis products have been observed on the premises since its establishment. I inquired with Schouman if any business had ever attempted to deliver cannabis or cannabis products to her establishment. Schouman mentioned that on one occasion, a delivery driver had indeed tried to make a delivery to DMS; however, she directed the driver to the front suite, 101, which was then occupied by a commercial cannabis business (Pivot Naturals, LLC C9-0000595-LIC & C11-0001233-LIC). Schouman further explained that DMS also utilizes the premises for storing and assembling furniture.

Afterwards, I performed an online search for DMS and found their website, which prominently displayed the address of the licensed premises. (**Attachment B**) Additionally, I noticed DMS's City of Costa Mesa Business License Tax Certificate (65359) displayed in DMS's front lobby. The certificate featured DMS's business name, the premises address, the principal's name, Jesus O. Romero, and notably, an expiration date of April 30, 2024. (**Attachment C**) Upon receiving authorization from Schouman, SI Kinney and I proceeded to conduct a walkthrough of the entire premises. Subsequently, I stepped out of the front lobby to the exterior of DMS's business, where I noticed the number 102 clearly displayed above the front door, as well as on a nearby mailbox situated to the left of the entrance. Inside the office areas, I observed various boxed furniture items and larger furniture pieces such as chairs, mattresses, box springs, and bed frames, all of which were covered in clear plastic wrapping. Additionally, I noticed furniture moving blankets, moving boxes, packaging paper, and extra rolls of clear plastic wrap. (**Attachment D**) In the warehouse section, I noticed several rows of industrial racks holding boxes of unassembled furniture. Additionally, within each row, there were more boxes of unassembled furniture and larger items such as box springs, mattresses, and large area rugs. Adjacent to the roll-up door, there were more boxes containing furniture, which seemed to have been temporarily relocated from the warehouse area to create walking space for the day. (**Attachment E**)

Upon finishing my inspection of DMS, I determined that Dyrect #4, LLC was not operational at the licensed premises and that no cannabis or cannabis products were stored there. Additionally, I determined that no





## INVESTIGATION REPORT (continued)

commercial cannabis business was currently operating on the licensed premises.

On February 23, 2024, I ran a Metrc report detailing the licensee's active inventory as of February 22, 2024 (the date of the inspection). According to the Metrc data, the licensee had approximately 24,263 active packages in its inventory. **(Attachment F)** On that same date, I produced an additional Metrc report detailing origin transfers from the licensee and destination transfers to the licensee. The origin transfers from the licensee documented eight transfers that took place between January 8, 2024, and February 13, 2024, from the premises. Each originating transfer was recorded as "created" by the licensee's owner, Garcia. **(Attachment G)** The destination transfers to the licensee documented 1,243 transfers that were recorded as "received" by the licensee, spanning from November 15, 2023, to February 22, 2024 as of approximately 5:43 PM, on February 23, 2024.

**(Attachment H)**

On March 4, 2024, Garcia and Parker, the owners, submitted Form DCC LIC 027 to the department, seeking to update Garcia's contact information. **(Attachment I-J)**

On March 5, 2024, I performed a follow-up review of the licensee's Metrc account. It came to my attention that the licensee had recorded an additional 103 transfers received between February 23, 2024, and March 3, 2024.

**(Attachment K)** Consequently, the department placed an administrative hold on the licensee's Metrc account.

**(Attachment L)**

On March 6, 2024, the department's licensing branch processed licensee's Form DCC LIC 027 to update the licensee's new contact information. **(Attachment M)** In this process, the department's licensing system, Accela, updated the record in the licensee's Metrc account. Consequently, this action inadvertently lifted the initial administrative hold placed on the licensee's Metrc account.

On March 21, 2024, I conducted a subsequent review of the licensee's Metrc account and discovered that they had reported receiving an additional 176 transfers. Furthermore, the licensee had 155 incoming transfers still pending reporting in Metrc as received or rejected. California Code of Regulations title 4 section 15049 subdivision (b) (1) & (2) state that receipt of cannabis or cannabis products and rejection of transferred cannabis or cannabis products shall be recorded in the track and trace system within 24 hours of occurrence. No additional origin transfers from the licensee were observed. As of March 21, 2024, the licensee had a total of 29,687 active packages reported in their Metrc account. **(Attachment N)** Consequently, the department imposed a secondary administrative hold on the licensee's Metrc account.

On the same date, I received an email from Katie Angel, Senior Management Analyst at the City of Costa Mesa, confirming that the licensee was not fully permitted by the city and did not possess a cannabis business permit to operate. Additionally, Michelle Halligan, Senior Planner at the City of Costa Mesa, mentioned that their city records indicate that the business, Designers Moving Service at 3595 Cadillac Ave #102 (premises), was issued on 06/05/2023 and is set to expire on 04/30/2024. **(Attachment O)**

On March 22, 2024, I obtained the premises diagram of the license from the Department's licensing database, Accela, for the purpose of this report. **(Attachment P)** The diagram indicated the licensee's address as the premises (3595 Cadillac Ave, Suite #102 Costa Mesa, CA 92626). Additionally, I retrieved a copy of the licensee's most recent Department issued license, uploaded to Accela on December 1, 2023, and verified that the premises address was accurately listed on the license. **(Attachment Q)**



## WITNESS LIST

### Witness #1

- Name: Aaron Lew
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road Rancho Cordova, CA 95670
- Phone: (916) 584-3852
- E-mail: [aaron.lew@cannabis.ca.gov](mailto:aaron.lew@cannabis.ca.gov)
- Miscellaneous information: Case Agent

### Witness #2

- Name: Eric Kinney
- Title/Position: Special Investigator
- Address: 2920 Kilgore Road Rancho Cordova, CA 95670
- Phone: (279) 220-05477
- E-mail: [eric.kinney@cannabis.ca.gov](mailto:eric.kinney@cannabis.ca.gov)
- Miscellaneous information: Assisted with the inspection of Dyrect #4, LLC on February 22, 2024.



## INVESTIGATION REPORT (continued)

### PREPARER

Name	Title
Aaron Lew	Special Investigator
Signature Aaron Lew <small>Digitally signed by Aaron Lew Date: 2024.05.17 11:12:35 -07'00'</small>	Date 05/17/2024

### REVIEWER

Name	Title
Jacob Nuchols	Supervising Special Investigator
Signature Nuchols, Jacob@Cannabis <small>Digitally signed by Nuchols, Jacob@Cannabis Date: 2024.05.17 11:19:16 -07'00'</small>	Date 5/17/2024

### LIST OF ATTACHMENTS

1. Attachment A- CDL D. Schouman
2. Attachment B- Designers Moving Service, Inc- Website
3. Attachment C- DMS Costa Mesa Business License Tax Certificate
4. Attachment D- Office area inspection photos
5. Attachment E- Warehouse area inspection photos
6. Attachment F- Packages Inventory Report Active as of 2.22.24
7. Attachment G- Transfers Report origin 6.25.23 - 2.22.24
8. Attachment H-Transfers Report destination 6.25.23 - 2.22.24
9. Attachment I- Email correspondences with licensee 1-3
10. Attachment J- Email correspondences with licensee 2-3
11. Attachment K-Transfers Report destination 02.23.24 - 03.05.24
12. Attachment L- Dyrect #4, LLC Metrc Hold Request
13. Attachment M- Email correspondences with licensee 3-3
14. Attachment N- Metrc Data as of 3.21.24
14. Attachment O- Email correspondences with city of Costa Mesa
15. Attachment P- Premises diagram
16. Attachment Q- License

## PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: Dyrect #4 LLC  
DCC Case No. DCC24-0000404-INV  
License Number: C11-0001690-LIC, Distributor License

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 August 6, 2025, I served the within documents:

### NOTICE OF DEFAULT DECISION AND ORDER

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

Dyrect #4 LLC  
Mauricio Garcia and  
Chloe Parker, Owners  
3595 Cadillac Ave., Ste. 102  
Costa Mesa, CA 92626  
Certified Mail No. 7022 1670 0001 3411 3561  
mauricoagarcia289@gmail.com

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

Chloe Parker  
115 Bumblebee  
Irvine, CA 92618  
Certified Mail No. 7022 1670 0001 3411 3585  
chloe@wooza.com

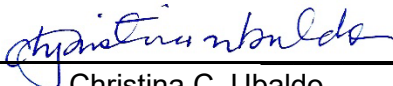
Harinder K. Kapur (email only)  
Senior Assistant Attorney General  
Cannabis Control Section  
Office of the Attorney General  
Harinder.Kapur@doj.ca.gov

Ryan Maddocks  
Agent for Service of Process  
1102 El Prado Unit B  
San Clemente, CA 92672  
Certified Mail No. 7022 1670 0001 3411 3592  
ryan@greencp.com

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

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

Executed on August 6, 2025, at Rancho Cordova, California.

  
Christina C. Ubaldo