



**Department of
Cannabis Control**
CALIFORNIA

Gavin Newsom
Governor

Nicole Elliott
Director

September 9, 2025

VIA EMAIL ONLY

T-Rex Distribution LLC
Jason Turchin, Owner
jturchin21@yahoo.com

Eric Shevin
Shevin Law Group
eric@shevinlaw.com

Re: T-Rex Distribution LLC - Case No. DCC25-0000002-ACC
Order Adopting Stipulated Settlement and Order as Final Decision

Dear Mr. Turchin:

Pursuant to section 11415.60 of the Government Code, attached please find a copy of the Department of Cannabis Control's Order Adopting Stipulated Settlement and Order as the Final Decision in the above-referenced matter involving T-Rex Distribution LLC.

The Department's Order and Final Decision will be effective on September 9, 2025. Pursuant to this Final Decision and its stipulated settlement, T-Rex Distribution LLC, has waived any right to reconsideration or appeal in this matter and to receive a copy of the Decision and Order via certified, registered, or first-class mail.

Sincerely,

Douglas Smurr
Assistant General Counsel

Enclosure

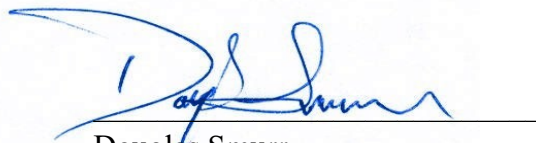
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8 **BEFORE THE**
9 **DEPARTMENT OF CANNABIS CONTROL**
10 **OF THE STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:) Case No. DCC25-0000002-ACC
12 T-REX DISTIRBUTION LLC;)
13 JASON TURCHIN, OWNER)
14 22639 Airport Way) **ORDER ADOPTING STIPULATED**
15 California City, CA 93505) **SETTLEMENT AND ORDER AS FINAL**
16 Cannabis – Distributor License) **DECISION**
17 No. C11-0000386-LIC)
Respondent.)

18
19 Pursuant to Government Code section 11415.60, the Department of Cannabis Control
20 hereby adopts the attached Stipulated Settlement and Order as its Final Decision in this matter.

21 This Order and Final Decision shall become effective on September 9, 2025.

22 IT IS SO ORDERED, September 9, 2025.

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24 

25 Douglas Smurr
26 Assistant General Counsel
27 FOR THE DEPARTMENT OF CANNABIS CONTROL
28

1 ROB BONTA
Attorney General of California
2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
3 MICHAEL DUONG
Deputy Attorney General
4 State Bar No. 327666
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-6807
Facsimile: (916) 327-8643
7 E-mail: Michael.Duong@doj.ca.gov
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. DCC25-0000002-ACC

13 **T-REX DISTRIBUTION LLC;**
14 **JASON TURCHIN, OWNER**
15 **22639 Airport Way,**
California City, CA 93505

**STIPULATED SETTLEMENT FOR
REVOCATION OF LICENSE AND ORDER**

16 **Cannabis – Distributor License**
17 **No. C11-0000386-LIC**

18 Respondent.

19
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Evelyn Schaeffer (Complainant) is the Deputy Director of the Compliance Division
24 of the Department of Cannabis Control (Department). She brought this action solely in her
25 official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of
26 California, by Michael Duong, Deputy Attorney General.

27 2. Respondent T-Rex Distribution LLC, (Respondent) and Jason Turchin (Owner
28 Turchin), Respondent's Owner, are represented in this proceeding by attorney Eric Shevin,

1 Shevin Law Group, located at 15260 Ventura Blvd., Suite 1400, Sherman Oaks, California
2 91403. Respondent is acting in this proceeding through Owner Turchin who has been designated
3 and authorized by T-Rex Distribution LLC., to enter into this agreement on behalf of Respondent.

4 3. On or about July 12, 2019, the Department issued Cannabis Distributor License
5 No. C11-0000386-LIC to Respondent. The Cannabis Distributor License was in full force and
6 effect at all times relevant to the charges brought in Accusation No. DCC25-0000002-ACC, and
7 expired on June 14, 2025, and has not been renewed.

8 **JURISDICTION**

9 4. On May 29, 2025, the Department filed a Petition for an Interim Suspension
10 Order with Case No. DCC25-0000002-ACC, against Respondent.

11 5. The Interim Order of Suspension was issued on June 27, 2025, and was effective
12 the same day. The Order suspended Respondent's Cannabis – Distributor License
13 No. C11-0000386-LIC and ordered Respondent to cease all commercial cannabis activity until a
14 final decision and order was made by the Department.

15 6. Accusation No. DCC25-0000002-ACC was filed before the Department and is
16 currently pending against Respondent. The Accusation and all other statutorily required
17 documents were properly served on Respondent on July 10, 2025. Respondent timely filed its
18 Notice of Defense contesting the Accusation.

19 7. A true and correct copy of Accusation No. DCC25-0000002-ACC is attached as Exhibit
20 A and incorporated herein by reference.

21 **ADVISEMENT AND WAIVERS**

22 8. Respondent and its current owners and members have carefully read and fully
23 discussed with counsel, and understand the charges and allegations in Accusation
24 No. DCC25-0000002-ACC. Respondent and its owners and members have also carefully read
25 and fully discussed with counsel and understand the effects of this Stipulated Settlement for
26 Revocation of License and Order.

27 9. Respondent and its current owners and members are fully aware of their legal rights
28 in this matter, including the right to a hearing on the charges and allegations in the Accusation;

1 the right to confront and cross-examine the witnesses against them; the right to present evidence
2 and to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of
3 witnesses and the production of documents; the right to reconsideration and court review of an
4 adverse decision; and all other rights accorded by the California Administrative Procedure Act
5 and other applicable laws.

6 10. Respondent and its current owners and members are fully aware of the legal right to
7 receive a copy of the Decision and Order via certified, registered, or first-class mail. Respondent
8 and its current owners of record and members agree to receive a copy of the Decision and Order
9 in this matter via email at the following email addresses: eric@shevinlaw.com and
10 gabrielle@shevinlaw.com.

11 11. Respondent and its current owners and members voluntarily, knowingly, and
12 intelligently waive and give up each and every right set forth above.

13 **CULPABILITY**

14 12. Respondent admits the truth of each and every charge and allegation in Accusation
15 No. DCC25-0000002-ACC.

16 13. Respondent agrees that Cannabis-Distributor License No. C11-0000386-LIC is
17 subject to revocation and agrees to be bound by the Department's imposition of discipline as set
18 forth in the Order below.

19 **CONTINGENCY**

20 14. This stipulation shall be subject to approval by the Department. Respondent
21 understands and agrees that counsel for Complainant and the staff of the Department may
22 communicate directly with the Department regarding this stipulation and settlement, without
23 notice to or participation by Respondent or its counsel. By signing the stipulation, Respondent
24 understands and agrees that it may not withdraw its agreement or seek to rescind the stipulation
25 prior to the time the Department considers and acts upon it. If the Department fails to adopt this
26 stipulation as its Decision and Order, the Stipulated Settlement for Revocation of License and
27 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
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1 action between the parties, and the Department shall not be disqualified from further action by
2 having considered this matter.

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

6 16. This Stipulated Settlement for Revocation of License and Order may be signed in any
7 number of counterparts, each of which is an original and all of which taken together form one
8 single document.

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

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

19 **DISCIPLINARY ORDER**

20 1. **WITHDRAWAL OF APPEAL.** Respondent's appeal of Accusation
21 No. DCC25-0000002-ACC and request for administrative hearing is deemed withdrawn and any
22 further appeal is waived.

23 2. **LICENSE REVOCATION.** Respondent's Cannabis Distributor License
24 No. C11-0000386-LIC is revoked as of the effective date of the Decision and Order. The
25 revocation of Respondent's Cannabis Distributor License shall constitute the imposition of
26 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
27 become a part of Respondent's license history with the Department. Respondent shall lose all
28

rights and privileges as a Cannabis Distributor in California as of the effective date of the Department's Decision and Order.

3. **REINSTATEMENT OF LICENSE.** If Respondent ever applies for licensure or petitions for reinstatement in the State of California, the Department shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for licensure in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. DCC25-0000002-ACC shall be deemed to be true, correct and admitted by Respondent when the Department determines whether to grant or deny the application or petition.

4. **PAYMENT OF COSTS OF ENFORCEMENT.** If Respondent or Owner Turchin applies for reinstatement of this license or applies for a new commercial cannabis license or new ownership interest in any commercial cannabis license, Respondent or Owner Turchin shall pay the Department's costs of enforcement for Case No. DCC25-0000002-ACC, in the amount of \$42,324.74 prior to issuance of a new or reinstated license.

ACCEPTANCE

I have carefully read the above Stipulated Settlement for Revocation of License and Order and have fully discussed it with my attorney, Eric Shevin. I understand the stipulation and the effect it will have on my Cannabis Distributor License C11-0000386-LIC. I enter into this Stipulated Settlement for Revocation of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Department of Cannabis Control.

DATED: 9/4/25


T-REX DISTRIBUTION LLC; JASON TURCHIN,
OWNER
Respondent

1 I have read and fully discussed with Respondent T-Rex Distribution LLC; Jason Turchin,
2 Owner the terms and conditions and other matters contained in the above Stipulated Settlement
3 for Revocation of License and Order. I approve its form and content.

4
5 DATED:

9/4/25



6 ERIC SHEVIN, Esq.
7 Shevin Law Group
8 *Attorneys for Respondent*

9 **ENDORSEMENT**

10 The foregoing Stipulated Settlement for Revocation of License and Order is hereby
11 respectfully submitted for consideration by the Department of Cannabis Control.

12 DATED:

9/4/25

Respectfully submitted,

13 ROB BONTA
14 Attorney General of California
15 GREGORY M. CRIBBS
16 Supervising Deputy Attorney General

Michael Duong

17 MICHAEL DUONG
18 Deputy Attorney General
19 *Attorneys for Complainant*

20 SD2025800835/CCS Stipulated Revocation and Order.docx
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Exhibit A

Accusation No. DCC25-0000002-ACC

1 ROB BONTA
Attorney General of California
2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
3 MICHAEL DUONG
Deputy Attorney General
4 State Bar No. 327666
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-6807
Facsimile: (916) 327-8643
7 E-mail: Michael.Duong@doj.ca.gov
Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

12 **T-REX DISTRIBUTION LLC;**
13 **JASON TURCHIN, OWNER**
14 **22639 Airport Way**
California City, CA 93505

15 **Cannabis – Distributor License**
16 **No. C11-0000386-LIC**

17 Respondent.

Case No. DCC25-0000002-ACC

OAH No. 2025051150

ACCUSATION

18
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 15, 2019, the Department issued Cannabis Commercial License
24 C11-0000386-LIC to Respondent with Jason Turchin as Owner (Owner Turchin). The
25 Cannabis - Distributor License was in full force and effect at all times relevant to the charges
26 brought herein and will expire on June 14, 2026, unless renewed.

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26031.01, if the licensee is found to have committed any of the acts or omissions constituting grounds for disciplinary action. The disciplinary proceedings under this chapter shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the director shall have all the powers granted therein.

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

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

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

10. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

11. Section 26030 of the Code states:

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

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

...

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

...

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

3 12. Section 26039.3 of the Code states, in part:

4 . . .

5 (b)(1) It is unlawful to remove, sell, or dispose of embargoed cannabis or an
6 embargoed cannabis product without written permission of the department or a
7 court. The removal, sale, or disposal of each item of embargoed cannabis or
8 cannabis product without written permission of the department constitutes a
violation of this subdivision. A violation of this subdivision is subject to a
citation and fine of not more than ten thousand dollars (\$10,000).

9 13. Section 26039.5 of the Code states:

10 (a) Cannabis or a cannabis product is misbranded if it is any of the following:

11 . . .

12 (4) Its labeling or packaging does not conform to the requirements of Section
13 26120 or any other labeling or packaging requirement established pursuant to this
division.

14 (b) It is unlawful to cultivate, process, manufacture, sell, deliver, hold, or offer
15 for sale cannabis or a cannabis product that is misbranded.

16 . . .

17 (d) It is unlawful to receive in commerce cannabis or a cannabis product that is
18 misbranded or to distribute, deliver, or offer for delivery any such cannabis or
cannabis product.

19 14. Section 26039.6 of the Code states:

20 (a) Cannabis or a cannabis product is adulterated if it is any of the following:

21 (2) It consists, in whole or in part, of any filthy, putrid, or decomposed
22 substance.

23 (3) It bears or contains any poisonous or deleterious substance that may
24 render it injurious to users under the conditions of use suggested in the labeling
or under conditions that are customary or usual.

25 . . .

26 (b) It is unlawful to cultivate, manufacture, distribute, sell, deliver, hold, or
27 offer for sale cannabis or a cannabis product that is adulterated.

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15. Section 26070, subdivision (g), of the Code states:

(g) The licensee receiving the shipment shall maintain each electronic shipping manifest and shall make it available upon request to the department and any law enforcement officers.

16. Section 26120, subdivision (a), of the Code states:

(a) Prior to delivery or sale at a retailer, cannabis and cannabis products shall be labeled and placed in a tamper-evident, child-resistant package and shall include a unique identifier for the purposes of identifying and tracking cannabis and cannabis products. If the cannabis or cannabis product contains multiple servings, the package shall also be resealable.

17. Section 26160, subdivision (a), of the Code states:

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

REGULATORY PROVISIONS

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

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

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

...

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

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

...

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

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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.

FACTUAL ALLEGATIONS

24. On or about April 28, 2021, Department staff learned that the California City Fire Department (CCFD) issued a cease-and-desist/stop work order to Respondent for its licensed premises, citing unsafe operations, and "red-tagged" the licensed premises. All activities at the licensed premises were ordered to be stopped until released by the CCFD.

25. On or about August 12, 2021, at the request of CCFD, Department staff conducted an unannounced inspection of Respondent's licensed premises. Upon arrival, Department staff were met by Matt Vreeke (Manager Vreeke), who identified himself as the manager of Respondent. During the inspection, Department staff discovered approximately 62 kilograms of cannabis concentrate that lacked package tags, labels, unique identifier (UID) numbers (UID number is a 24-character identifier code used to track cannabis products), manufacturer name, and manufacture date. When Department staff asked about documentation, such as UIDs, manifests,

1 or invoices, Manager Vreeke could not provide any documentation, nor could he confirm that the
2 concentrate originated from a licensed source.

3 26. On or about August 19, 2021, Department staff returned to the licensed premises
4 to discuss the cannabis concentrate. After discussing options with Department staff, Manager
5 Vreeke opted to conduct a voluntary condemnation and destruction (VC&D) of the cannabis
6 concentrate as there was no traceability to the licensed premises and/or a licensed source.

7 27. On or about September 16, 2021, Department staff returned to the licensed
8 premises to confirm that all the cannabis concentrate had been destroyed. Department staff
9 observed that the cannabis concentrate was no longer at the licensed premises.

10 28. On January 10, 2023, Department staff went to the licensed premises to conduct a
11 compliance inspection after receiving reports from California City Municipal Airport staff, that
12 unauthorized activity was taking place at the “red-tagged” licensed premises. Department staff
13 inspected the licensed premises and discovered approximately 3,000 lbs. of misbranded and
14 adulterated cannabis biomass that was untagged, untraceable, and contained mold. The tags
15 showed that they came from another licensee and were marked as “moldy.” The DCC license
16 records for the other licensee listed Jason Turchin as the owner, and also Respondent’s owner.
17 There was no record in the Respondent’s CCTT account of this product ever being transferred to
18 Respondent’s licensed premises.

19 29. On or about January 11, 2023, Department staff returned to the licensed premises.
20 Upon entry, Department staff was met by John Herrera (property owner) and Kevin Yessen
21 (Yessen). Department staff observed video surveillance equipment, including video cameras, on-
22 site and then requested to review video surveillance. Both Yessen and Owner Turchin informed
23 Department Staff that they did not have access to video surveillance footage. Department staff
24 informed Yessen and Owner Turchin that they needed to resolve the cease-and-desist red tagging)
25 issue with the CCFD prior to re-entry into the licensed premises.

26 30. On or about October 2, 2024, Department staff reviewed Respondent’s CCTT
27 account for active commercial cannabis activities at the licensed premises which showed account
28 activity beginning from on or about August 19, 2024. Department staff checked with CCFD and

1 were told that there had been no activity or personnel at the licensed premises since on or about
2 January 11, 2023.

3 31. On or about October 16, 2024, Department staff, accompanied by CCFD and
4 CCPD, conducted an unannounced inspection of the licensed premises. Upon arrival, there were
5 no cars observed in the gated parking lot, nor were there any other visible signs of activity from
6 the exterior of the licensed premises. However, the “Knox” lock placed by the CCFD had been
7 removed and replaced with a Master Lock. CCFD staff used bolt cutters to forcibly remove the
8 Master Lock.

9 32. Upon entering the interior of the licensed premises, there were no signs of
10 commercial cannabis, or any other, activities. The power was off, and the licensed premises was
11 devoid of any manufacturing equipment, cannabis, and cannabis products. Department staff,
12 CCFD, and CCPD officials inspected and documented the condition of each room and concluded
13 that Respondent was non-operational at the licensed premises.

14 33. Notwithstanding the results of the October 16, 2024, on-site inspection, there are
15 multiple CCTT entries in Respondent’s CCTT account dating from August 3, 2024, through May
16 6, 2025. All of these CCTT entries document that the cannabis or cannabis products are
17 physically located at the licensed premises, which as of October 16, 2024, was confirmed as “red-
18 tagged” and non-operational. Most of the products in Respondent’s CCTT account consist of bulk
19 cannabis flower.

20 **FIRST CAUSE FOR DISCIPLINE**

21 (Failure to Comply with Local Ordinances)

22 34. Respondent is subject to disciplinary action under Code section 26030, subdivision
23 (f), in that Respondent operated out of a premise that was placed under a local cease-and-desist
24 order, as more particularly alleged in paragraphs 24 through 33, above, which are hereby
25 incorporated by reference and realleged as if fully set forth herein.

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1 **SIXTH CAUSE FOR DISCIPLINE**

2 (Maintain Records)

3 39. Respondent is further subject to disciplinary action under Code sections 26070,
4 subdivision (g), and 26160, subdivision (a), and California Code of Regulations, title 4, section
5 15037, subdivisions (a)(1) and (7), in that Respondent failed to maintain records as more
6 particularly alleged in paragraphs 25, 28, and 33, above, which are hereby incorporated by
7 reference and realleged as if fully set forth herein.

8 **SEVENTH CAUSE FOR DISCIPLINE**

9 (Video Surveillance System)

10 40. Respondent is further subject to disciplinary action under Code section 26030,
11 subdivision (a) and (c), and California Code of Regulations, title 4, section 15044, subsection (i),
12 in that Respondent failed to maintain a video surveillance system, as more particularly alleged in
13 paragraph 29, above, which is hereby incorporated by reference and realleged as if fully set forth
14 herein.

15 **EIGHTH CAUSE FOR DISCIPLINE**

16 (CCTT Account Information)

17 41. Respondent is further subject to disciplinary action under Code section 26030,
18 subdivision (a), and California Code of Regulations, title 4, section 15047.2, subdivisions (b) and
19 (d), in that Respondent failed to enter accurate information in its CCTT account, as more
20 particularly alleged in paragraphs 30 and 33, above, which are hereby incorporated by reference
21 and realleged as if fully set forth herein.

22 **PRAYER**

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that the following the hearing, the Director of the Department of Cannabis Control issue a
25 decision:

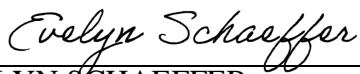
26 1. Revoking or suspending outright, or suspending with terms and conditions, or fining,
27 or any combination thereof, the Cannabis – Distributor License Number No. C11-0000386-LIC,
28 issued to Respondent T-Rex Distribution, LLC, with Jason Turchin as Owner;

1 2. Ordering Respondent T-Rex Distribution, LLC, with Jason Turchin as Owner, to pay
2 the Department of Cannabis Control the reasonable costs of the investigation and enforcement of
3 this case, pursuant to Business and Professions Code section 26031.1;

4 3. Ordering the destruction of cannabis and cannabis goods in the possession of
5 Respondent T-Rex Distribution, LLC, with Jason Turchin as Owner, at Respondent's expense, if
6 revocation of Cannabis – Distributor License Number No. C11-0000386-LIC is ordered, pursuant
7 to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

8 4. Taking such other and further action as deemed necessary and proper.

9
10 DATED: July 9, 2025



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

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PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: T-Rex Distribution LLC
DCC Case No. DCC25-0000002-ACC
License Number: C11-0000386-LIC, Distributor

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Department of Cannabis Control, 2920 Kilgore Road, Rancho Cordova, CA 95670. On September 9, 2025, I served the within documents:

ORDER ADOPTING STIPULATED SETTLEMENT AND ORDER AS FINAL DECISION

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

T-Rex Distribution LLC
Jason Turchin, Owner
jturchin21@yahoo.com

Eric Shevin
Shevin Law Group
eric@shevinlaw.com
cc: gabrielle@shevinlaw.com

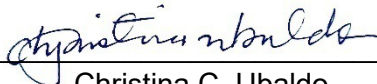
Evelyn Schaeffer (email only)
Deputy Director
Compliance Division
Department of Cannabis Control
Evelyn.Schaeffer@cannabis.ca.gov

Michael Duong (email only)
Deputy Attorney General
Cannabis Control Section
Office of the Attorney General
Michael.Duong@doj.ca.gov

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

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

Executed on September 9, 2025, at Rancho Cordova, California.


Christina C. Ubaldo