



Department of
Cannabis Control
CALIFORNIA

Gavin Newsom
Governor

Nicole Elliott
Director

October 29, 2025

VIA EMAIL AND CERTIFIED MAIL

California Harvest Fund LLC
Jason Turchin, Owner
15023 Ramona Blvd.
Baldwin Park, CA 91706
jturch@trexdistribution.com

Re: California Harvest Fund LLC - Case No. DCC25-0001410-INV
Default Decision and Order

Dear Mr. Turchin:

Pursuant to the Department of Cannabis Control's authority under Government Code section 11520, the Department finds Respondent California Harvest Fund 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 California Harvest Fund LLC, will become effective on December 1, 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 **CALIFORNIA HARVEST FUND LLC;**
13 **JASON TURCHIN, OWNER**
14 **15023 Ramona Blvd.**
15 **Baldwin Park, CA 91706**

16 **Cannabis Distributor License**
17 **No. C11-0001995-LIC**
18 **Cannabis Manufacturer - Type 7 License**
19 **No. DCC-10005051**

20 Respondent.

Case No. DCC25-0001410-INV

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

21 **FINDINGS OF FACT**

22 1. On or about September 29, 2025, Complainant Evelyn Schaeffer, in her official
23 capacity as the Deputy Director of the Compliance Division of the Department of Cannabis
24 Control, filed Accusation No. DCC25-0001410-INV against California Harvest Fund LLC
25 (Respondent) before the Department of Cannabis Control. (Accusation attached as Exhibit A.)

26 2. On or about January 15, 2025, the Department issued Cannabis Manufacturer - Type
27 7 License No. DCC-10005051 to Respondent. The Cannabis Manufacturer - Type 7 License was
28 in full force and effect at all times relevant to the charges brought in Accusation
No. DCC25-0001410-INV and will expire on January 15, 2026, unless renewed.

1 3. On or about April 4, 2025, the Department of Cannabis Control (Department) issued
2 Cannabis Distributor License No. C11-0001995-LIC to Respondent. The Cannabis Distributor
3 License was in full force and effect at all times relevant to the charges brought in Accusation
4 No. DCC25-0001410-INV and will expire on April 4, 2026, unless renewed.

5 4. On or about September 29, 2025, Respondent was served by Certified and First Class
6 Mail copies of the Accusation No. DCC25-0001410-INV, Statement to Respondent, Notice of
7 Defense, Request for Discovery and Discovery Statutes (Government Code sections 11507.5,
8 11507.6, and 11507.7) at Respondent's address of record which, pursuant to California Code of
9 Regulations, title 4, section 15002, is required to be reported and maintained with the
10 Department. Respondent's address of record was and is: 15023 Ramona Blvd., Baldwin Park, CA
11 91706.

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

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

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

20 7. The Department takes official notice of its records and the fact that Respondent failed
21 to file a Notice of Defense within 15 days after service upon them of the Accusation, and
22 therefore waived its right to a hearing on the merits of Accusation No. DCC25-0001410-INV.

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

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

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

1 matter, finds that the charges and allegations in Accusation No. DCC25-0001410-INV, are
2 separately and severally, found to be true and correct by clear and convincing evidence.

3 10. The Department finds that the actual costs for Investigation and Enforcement are
4 \$17,765.50 as of October 22, 2025.

5 **DETERMINATION OF ISSUES**

6 1. Based on the foregoing findings of fact, Respondent California Harvest Fund LLC
7 has subjected its Cannabis Distributor License No. C11-0001995-LIC, and its Cannabis
8 Manufacturer - Type 7 License No. DCC-10005051, and each of them, to discipline.

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

10 3. The Department of Cannabis Control is authorized to revoke Respondent's Cannabis
11 Distributor License, and Respondent's Cannabis Manufacturer - Type 7 License, and each off
12 them, based upon the following violations alleged in the Accusation which are supported by the
13 evidence contained in the Default Decision Investigatory Evidence Packet in this case:

- 14 a. Business and Professions Code section 26053, subdivision (a), and California Code of
15 Regulations, title 4, section 15000.1, subdivision (b), commercial cannabis activity
16 conducted between licensees;
- 17 b. Business and Professions Code section 26030, subdivisions (a) and (c), and California
18 Code of Regulations, title 4, sections 15047.2, subdivision (b), 15049, subdivisions
19 (b) and (d), and 15049.2, failure to record commercial cannabis activity in California
20 Cannabis Track and Trace;
- 21 c. Business and Professions Code section 26030, subdivisions (a) and (c), and California
22 Code of Regulations, title 4, sections 15047.2, subdivision (b), 15048.2, 15049, and
23 15049.2, subdivision (a), failure to affix package tags; and
- 24 d. Business and Professions Code section 26030, subdivisions (a) and (c), and California
25 Code of Regulations, title 4, section 17800, failure to furnish employment records.

26 ///

27 ///

28 ///

ORDER

IT IS SO ORDERED that Cannabis Distributor License No. C11-0001995-LIC, issued to Respondent California Harvest Fund LLC, is revoked.

IT IS FURTHER ORDERED that Cannabis Manufacturer - Type 7 License No. DCC-10005051, issued to Respondent California Harvest Fund LLC, is revoked.

IT IS FURTHER ORDERED that Respondent California Harvest Fund LLC destroy, at its expense, all cannabis and cannabis goods in the possession of Respondent California Harvest Fund LLC.

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

This Decision shall become effective on December 1, 2025.

It is SO ORDERED, October 29, 2025.



Douglas Smurr
Assistant General Counsel
FOR THE DEPARTMENT OF CANNABIS CONTROL

Default Decision and Order - LIC.docx
DOJ Matter ID:LA2025802850

Attachment:
Exhibit A: Accusation

Exhibit A

Accusation

(CALIFORNIA HARVEST FUND LLC; JASON TURCHIN, OWNER)

1 ROB BONTA
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2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
3 MATTHEW S. BEASLEY
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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. DCC25-0001410-INV

13 **CALIFORNIA HARVEST FUND LLC;**
14 **JASON TURCHIN, OWNER**
15 **15023 Ramona Blvd.**
Baldwin Park, CA 91706

ACCUSATION

16 **Cannabis Distributor License**
17 **No. C11-0001995-LIC**
18 **Cannabis Manufacturer - Type 7 License**
19 **No. DCC-10005051**

Respondent.

20 Complainant alleges:

21 **PARTIES**

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

25 2. On or about April 4, 2025, the Department issued Commercial Cannabis Distributor
26 License No. C11-0001995-LIC to California Harvest Fund LLC (Respondent). The Commercial
27 Cannabis Distributor License was in full force and effect at all times relevant to the charges
28 brought herein and will expire on April 4, 2026, unless renewed.

3. On or about January 15, 2025, the Department issued Commercial Cannabis Manufacturer - Type 7 License No. DCC-10005051 to Respondent. The Commercial Cannabis Manufacturer - Type 7 License was in full force and effect at all times relevant to the charges brought herein and will expire on January 15, 2026, unless renewed.

JURISDICTION

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

5. Section 26010 of the Code states:

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

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

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

7. Section 26011.5 of the Code states:

The protection of the public shall be the highest priority for the department in exercising licensing, regulatory, and disciplinary functions under this division. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

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

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

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

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

10. Section 26031 of the Code states:

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

(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.

11. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

12. Section 26030 of the Code states, in pertinent part:

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.

...

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

3 ...

4 13. Section 26053 of the Code states, in pertinent part:

5 (a) All commercial cannabis activity shall be conducted between licensees,
6 except as otherwise provided in this division.

7 14. Section 26160 of the Code states, in pertinent part:

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

9 ...

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

14 ...

15 **REGULATORY PROVISIONS**

16 15. Title 4 of the California Code of Regulations, section 15000.1, subdivision (b), states,
17 in pertinent part: "Commercial cannabis activity shall only be conducted between licensees."

18 16. Title 4 of the California Code of Regulations, section 15047.2, subdivision (b), states:
19 "All commercial cannabis activity shall be accurately recorded in the track and trace system."

20 17. Title 4 of the California Code of Regulations, section 15048.2, states:

21 (a) A licensee shall only use plant and package tags provided and distributed by
22 the Department or the Department's designee.

23 (b) A licensee shall only use plant and package tags assigned in the track and
24 trace system to that licensee and shall not transfer unused tags to any other licensee.

25 (c) A licensee shall maintain a sufficient supply of tags to support tagging in
accordance with this chapter.

26 (d) Plant and package tags shall be discarded after they are no longer required
27 for use.

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

2 (a) All cannabis and cannabis products on the licensed premises shall be
3 assigned a plant or package tag, as applicable, except for harvested plants that are
4 being dried, cured, graded, or trimmed, as specified in this division, and recorded in
the track and trace system.

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

6 (1) Receipt of cannabis or cannabis products.

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

8 (3) Manufacturing of cannabis or cannabis products.

9 (4) Use of cannabis or cannabis product for internal quality control testing or
10 product research and development.

11 (5) Destruction or disposal of cannabis or cannabis products.

12 (6) Packaging or repackaging of cannabis or cannabis products, except that
cultivation licensees shall comply with section 15049.1(b)(5).

13 (7) Laboratory testing, including testing results.

14 (8) Sale or donation of cannabis or cannabis products.

15 (c) The following information shall be recorded in the track and trace system
16 for each activity entered pursuant to subsection (b):

17 (1) The type of cannabis or cannabis products.

18 (2) The weight, volume, or count of the cannabis or cannabis products.

19 (3) The date of activity.

20 (4) The UID assigned to the cannabis or cannabis products.

21 (5) The brand name of the cannabis goods.

22 (6) If cannabis or cannabis products are being destroyed or disposed of, the
licensee shall record the following information in the notes section:

23 (A) The name of the employee performing the destruction or disposal;

24 (B) The reason for destruction or disposal; and

25 (C) The method of disposal.

26 (d) If a package adjustment is used to adjust the quantity of cannabis or
27 cannabis products in the track and trace system, the licensee shall include a
description explaining the reason for adjustment.

28 (e) If a licensee rejects a partial shipment of cannabis goods pursuant to section

15052.1(b), the licensee shall record the partial rejection in the track and trace system.

19. Title 4 of the California Code of Regulations, section 15049.2, states:

(a) A licensee shall prepare a shipping manifest through the track and trace system prior to transferring cannabis and cannabis products off of a licensed premises. The following information shall be recorded on the shipping manifest by the licensee initiating the transfer:

(1) The name, license number, and premises address of the originating licensee;

(2) The name and license number of the distributor transporting the cannabis and cannabis products;

(3) The name, license number, and premises address of the licensee receiving the cannabis or cannabis products into inventory or storage;

(4) The UID numbers for all items being transferred;

(5) The item name, item category and weight or count of cannabis or cannabis products associated with each package tag;

(6) The estimated date and time of departure from the licensed premises;

(7) The estimated date and time of arrival at each licensed premises; and

(8) The driver's license number of the personnel transporting the cannabis and cannabis products, and the make, model, and license plate number of the vehicle used for transport.

(b) The distributor who transports the cannabis or cannabis product shall record the following additional information on the shipping manifest:

(1) The actual date and time of departure from the licensed premises; and

(2) The actual date and time of arrival at each licensed premises.

(c) Upon pick-up or receipt of cannabis and cannabis products for transport, storage, or inventory, a licensee shall ensure that the cannabis or cannabis products received are as described in the shipping manifest. The licensee shall record acceptance or receipt, and acknowledgment of the cannabis or cannabis products in the track and trace system.

(d) If there are any discrepancies between type or quantity of cannabis or cannabis products specified in the shipping manifest and the type or quantity received by the licensee, the licensee shall reject the shipment.

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

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

(1) Enter any premises licensed by the Department.

...

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

...

COST RECOVERY

21. Section 26031.1 of the Code states:

(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

1 recovery of the costs of investigation and enforcement of a case in any stipulated
2 settlement.

3 **FACTUAL ALLEGATIONS**

4 22. On or about July 9, 2025, Department investigative staff searched Respondent's
5 account information in the California Cannabis Track and Trace system (CCTT). Respondent
6 had reported no inventory for its Commercial Cannabis Distributor License or for its Commercial
7 Cannabis Manufacturer License.

8 23. On or about July 15, 2025, Department investigative staff performed a compliance
9 inspection at Respondent's licensed premises. While on site, investigators observed multiple jars
10 of cannabis distillate, bagged cannabis products, cannabis edibles, and bags with cannabis trim
11 and shake. Department investigators also observed five packages of pre-rolls that were labeled as
12 shipped from Arizona. None of the cannabis or cannabis products had CCTT tags, and
13 Respondent's compliance manager admitted that none of the cannabis or cannabis products on
14 site were reported by Respondent in its CCTT account.

15 24. All non-compliant cannabis or cannabis products on site were placed under embargo
16 by the Department, and subsequently destroyed by Respondent.

17 25. During the inspection on July 15, 2025, Department investigators observed men's
18 clothing and shoes in a locker room. Respondent's compliance manager told Department
19 investigators that this clothing might belong to a man named "Adrian" who had worked at
20 Respondent's licensed premises as a security guard. Department investigators asked
21 Respondent's compliance manager for employment records for Adrian. Respondent's
22 compliance manager replied that no such records were available.

23 **FIRST CAUSE FOR DISCIPLINE**

24 (Commercial Cannabis Activity Conducted Between Licensees)

25 26. Respondent is subject to disciplinary action under Code section 26053, subdivision
26 (a), and California Code of Regulations, title 4, section 15000.1, subdivision (b), in that
27 Respondent conducted commercial cannabis activity with persons or entities that did not have
28

1 California commercial cannabis license(s), as more particularly alleged in paragraphs 22 through
2 25, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

3 **SECOND CAUSE FOR DISCIPLINE**

4 (Failure to Record Commercial Cannabis Activity in CCTT)

5 27. Respondent is further subject to disciplinary action under Code section 26030,
6 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, subdivision
7 (b), 15049, subdivisions (b) and (d), and 15049.2, in that Respondent failed to record in CCTT
8 any of the cannabis and cannabis products Department investigators discovered on site, as more
9 particularly alleged in paragraphs 22 through 25, above, which are hereby incorporated by
10 reference and realleged as if fully set forth herein.

11 **THIRD CAUSE FOR DISCIPLINE**

12 (Failure to Affix Package Tags)

13 28. Respondent is further subject to disciplinary action under Code section 26030,
14 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, subdivision
15 (b), 15048.2, 15049, and 15049.2, subdivision (a), in that Respondent had cannabis and cannabis
16 products, on its licensed premises, that were not labeled and which did not have unique identifier
17 tags, as more particularly alleged in paragraphs 22 through 25, above, which are hereby
18 incorporated by reference and realleged as if fully set forth herein.

19 **FOURTH CAUSE FOR DISCIPLINE**

20 (Failure to Furnish Employment Records)

21 29. Respondent is further subject to disciplinary action under Code section 26030,
22 subdivisions (a) and (c), and California Code of Regulations, title 4, section 17800, in that
23 Respondent failed to provide employment records for its employee, as more particularly alleged
24 in paragraphs 22 through 25, above, which are hereby incorporated by reference and realleged as
25 if fully set forth herein.

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PRAYER

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

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis Distributor License Number C11-0001995-LIC, issued to Respondent California Harvest Fund LLC;

2. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis Manufacturer - Type 7 License Number DCC-10005051, issued to Respondent California Harvest Fund LLC;

3. Ordering Respondent California Harvest Fund LLC to pay the Department the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1;

4. Ordering the destruction of cannabis and cannabis goods in the possession of California Harvest Fund LLC at Respondent's expense, if revocation of Cannabis Distributor License Number C11-0001995-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a);

5. Ordering the destruction of cannabis and cannabis goods in the possession of California Harvest Fund LLC at Respondent's expense, if revocation of Cannabis Manufacturer - Type 7 License Number DCC-10005051 is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

DATED: September 29, 2025



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

LA2025802850
CCS Accusation.docx

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

In the Matter of the Accusation Against:

**CALIFORNIA HARVEST FUND LLC;
JASON TURCHIN, OWNER
15023 Ramona Blvd.
Baldwin Park, CA 91706**

**Cannabis Distributor License
No. C11-0001995-LIC
Cannabis Manufacturer - Type 7 License
No. DCC-10005051**

Respondent.

Case No. DCC25-0001410-INV

**DEFAULT DECISION INVESTIGATORY
EVIDENCE PACKET**

[Gov. Code §11520]

The Default Decision Investigatory Evidence Packet in support of the Default Decision and Order in the above-entitled matter consists of the following.

Exhibit 1: Pleadings offered for jurisdictional purposes: Accusation No. DCC25-0001410-INV, statement to respondent, notice of defense (two blank copies), request for discovery and discovery statutes (government code sections 11507.5, 11507.6 and 11507.7), and proof of service;

Exhibit 2: License for California Harvest Fund LLC, Cannabis Distributor License No. C11-0001995-LIC, and License for Cannabis Manufacturer - Type 7 License No. DCC-10005051;

Exhibit 3: Certification of Costs by Department for Investigation in Case No. DCC25-0001410-INV dated October 23, 2025;

Exhibit 4: Certification of Prosecution Costs by California Department of Justice dated October 23, 2025; and

Exhibit 5: Investigative Report (without attachments), case number DCC25-0001410-INV.

Dated: October 27, 2025

Respectfully submitted,

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

/s/ Matthew S. Beasley

MATTHEW S. BEASLEY
Deputy Attorney General
Attorneys for Complainant

Exhibit 1

Accusation No. DCC25-0001410-INV

Statement to Respondent

Notice of Defense

Request for Discovery

Discovery Statutes, Proofs of Service

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Attorney General of California
2 GREGORY M. CRIBBS
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7 *Attorneys for Complainant*

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

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11 In the Matter of the Accusation Against:

Case No. DCC25-0001410-INV

12 **CALIFORNIA HARVEST FUND LLC;**
13 **JASON TURCHIN, OWNER**
15023 Ramona Blvd.

STATEMENT TO RESPONDENT

[Gov. Code §§ 11504, 11505(b)]

14 **Baldwin Park, CA 91706**

15 **Cannabis Distributor License**
16 **No. C11-0001995-LIC**
Cannabis Manufacturer - Type 7 License
17 **No. DCC-10005051**

Respondent.

18
19
20 TO RESPONDENT:

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

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

28 ///

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 **Matthew S. Beasley**
5 **Deputy Attorney General**
6 **300 South Spring Street, Suite 1702**
7 **Los Angeles, CA 90013**
8 **Email: Matthew.Beasley@doj.ca.gov**

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

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

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

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

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

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

25 **NOTICE REGARDING STIPULATED SETTLEMENTS**

26 It may be possible to avoid the time, expense and uncertainties involved in an
27 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated
28 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 Deputy Attorney General Matthew S.
9 Beasley at the earliest opportunity.

10
11 Dated: September 29, 2025

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

Matthew S. Beasley

MATTHEW S. BEASLEY
Deputy Attorney General
Attorneys for Complainant

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1 ROB BONTA
Attorney General of California
2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
3 MATTHEW S. BEASLEY
Deputy Attorney General
4 State Bar No. 288070
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6705
6 Facsimile: (916) 731-2126
E-mail: Matthew.Beasley@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. DCC25-0001410-INV

13 **CALIFORNIA HARVEST FUND LLC;**
14 **JASON TURCHIN, OWNER**
15 **15023 Ramona Blvd.**
Baldwin Park, CA 91706

ACCUSATION

16 **Cannabis Distributor License**
17 **No. C11-0001995-LIC**
18 **Cannabis Manufacturer - Type 7 License**
19 **No. DCC-10005051**

Respondent.

20 Complainant alleges:

21 **PARTIES**

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

25 2. On or about April 4, 2025, the Department issued Commercial Cannabis Distributor
26 License No. C11-0001995-LIC to California Harvest Fund LLC (Respondent). The Commercial
27 Cannabis Distributor License was in full force and effect at all times relevant to the charges
28 brought herein and will expire on April 4, 2026, unless renewed.

3. On or about January 15, 2025, the Department issued Commercial Cannabis Manufacturer - Type 7 License No. DCC-10005051 to Respondent. The Commercial Cannabis Manufacturer - Type 7 License was in full force and effect at all times relevant to the charges brought herein and will expire on January 15, 2026, unless renewed.

JURISDICTION

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

5. Section 26010 of the Code states:

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

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

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

7. Section 26011.5 of the Code states:

The protection of the public shall be the highest priority for the department in exercising licensing, regulatory, and disciplinary functions under this division. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

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

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

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

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

10. Section 26031 of the Code states:

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

(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.

11. Section 26034 of the Code states:

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

STATUTORY PROVISIONS

12. Section 26030 of the Code states, in pertinent part:

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.

...

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

3 ...

4 13. Section 26053 of the Code states, in pertinent part:

5 (a) All commercial cannabis activity shall be conducted between licensees,
6 except as otherwise provided in this division.

7 14. Section 26160 of the Code states, in pertinent part:

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

9 ...

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

14 ...

15 **REGULATORY PROVISIONS**

16 15. Title 4 of the California Code of Regulations, section 15000.1, subdivision (b), states,
17 in pertinent part: "Commercial cannabis activity shall only be conducted between licensees."

18 16. Title 4 of the California Code of Regulations, section 15047.2, subdivision (b), states:
19 "All commercial cannabis activity shall be accurately recorded in the track and trace system."

20 17. Title 4 of the California Code of Regulations, section 15048.2, states:

21 (a) A licensee shall only use plant and package tags provided and distributed by
22 the Department or the Department's designee.

23 (b) A licensee shall only use plant and package tags assigned in the track and
24 trace system to that licensee and shall not transfer unused tags to any other licensee.

25 (c) A licensee shall maintain a sufficient supply of tags to support tagging in
accordance with this chapter.

26 (d) Plant and package tags shall be discarded after they are no longer required
27 for use.

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

2 (a) All cannabis and cannabis products on the licensed premises shall be
3 assigned a plant or package tag, as applicable, except for harvested plants that are
4 being dried, cured, graded, or trimmed, as specified in this division, and recorded in
the track and trace system.

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

6 (1) Receipt of cannabis or cannabis products.

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

8 (3) Manufacturing of cannabis or cannabis products.

9 (4) Use of cannabis or cannabis product for internal quality control testing or
10 product research and development.

11 (5) Destruction or disposal of cannabis or cannabis products.

12 (6) Packaging or repackaging of cannabis or cannabis products, except that
cultivation licensees shall comply with section 15049.1(b)(5).

13 (7) Laboratory testing, including testing results.

14 (8) Sale or donation of cannabis or cannabis products.

15 (c) The following information shall be recorded in the track and trace system
16 for each activity entered pursuant to subsection (b):

17 (1) The type of cannabis or cannabis products.

18 (2) The weight, volume, or count of the cannabis or cannabis products.

19 (3) The date of activity.

20 (4) The UID assigned to the cannabis or cannabis products.

21 (5) The brand name of the cannabis goods.

22 (6) If cannabis or cannabis products are being destroyed or disposed of, the
licensee shall record the following information in the notes section:

23 (A) The name of the employee performing the destruction or disposal;

24 (B) The reason for destruction or disposal; and

25 (C) The method of disposal.

26 (d) If a package adjustment is used to adjust the quantity of cannabis or
27 cannabis products in the track and trace system, the licensee shall include a
description explaining the reason for adjustment.

28 (e) If a licensee rejects a partial shipment of cannabis goods pursuant to section

15052.1(b), the licensee shall record the partial rejection in the track and trace system.

19. Title 4 of the California Code of Regulations, section 15049.2, states:

(a) A licensee shall prepare a shipping manifest through the track and trace system prior to transferring cannabis and cannabis products off of a licensed premises. The following information shall be recorded on the shipping manifest by the licensee initiating the transfer:

(1) The name, license number, and premises address of the originating licensee;

(2) The name and license number of the distributor transporting the cannabis and cannabis products;

(3) The name, license number, and premises address of the licensee receiving the cannabis or cannabis products into inventory or storage;

(4) The UID numbers for all items being transferred;

(5) The item name, item category and weight or count of cannabis or cannabis products associated with each package tag;

(6) The estimated date and time of departure from the licensed premises;

(7) The estimated date and time of arrival at each licensed premises; and

(8) The driver's license number of the personnel transporting the cannabis and cannabis products, and the make, model, and license plate number of the vehicle used for transport.

(b) The distributor who transports the cannabis or cannabis product shall record the following additional information on the shipping manifest:

(1) The actual date and time of departure from the licensed premises; and

(2) The actual date and time of arrival at each licensed premises.

(c) Upon pick-up or receipt of cannabis and cannabis products for transport, storage, or inventory, a licensee shall ensure that the cannabis or cannabis products received are as described in the shipping manifest. The licensee shall record acceptance or receipt, and acknowledgment of the cannabis or cannabis products in the track and trace system.

(d) If there are any discrepancies between type or quantity of cannabis or cannabis products specified in the shipping manifest and the type or quantity received by the licensee, the licensee shall reject the shipment.

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

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

(1) Enter any premises licensed by the Department.

...

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

...

COST RECOVERY

21. Section 26031.1 of the Code states:

(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

1 recovery of the costs of investigation and enforcement of a case in any stipulated
2 settlement.

3 **FACTUAL ALLEGATIONS**

4 22. On or about July 9, 2025, Department investigative staff searched Respondent's
5 account information in the California Cannabis Track and Trace system (CCTT). Respondent
6 had reported no inventory for its Commercial Cannabis Distributor License or for its Commercial
7 Cannabis Manufacturer License.

8 23. On or about July 15, 2025, Department investigative staff performed a compliance
9 inspection at Respondent's licensed premises. While on site, investigators observed multiple jars
10 of cannabis distillate, bagged cannabis products, cannabis edibles, and bags with cannabis trim
11 and shake. Department investigators also observed five packages of pre-rolls that were labeled as
12 shipped from Arizona. None of the cannabis or cannabis products had CCTT tags, and
13 Respondent's compliance manager admitted that none of the cannabis or cannabis products on
14 site were reported by Respondent in its CCTT account.

15 24. All non-compliant cannabis or cannabis products on site were placed under embargo
16 by the Department, and subsequently destroyed by Respondent.

17 25. During the inspection on July 15, 2025, Department investigators observed men's
18 clothing and shoes in a locker room. Respondent's compliance manager told Department
19 investigators that this clothing might belong to a man named "Adrian" who had worked at
20 Respondent's licensed premises as a security guard. Department investigators asked
21 Respondent's compliance manager for employment records for Adrian. Respondent's
22 compliance manager replied that no such records were available.

23 **FIRST CAUSE FOR DISCIPLINE**

24 (Commercial Cannabis Activity Conducted Between Licensees)

25 26. Respondent is subject to disciplinary action under Code section 26053, subdivision
26 (a), and California Code of Regulations, title 4, section 15000.1, subdivision (b), in that
27 Respondent conducted commercial cannabis activity with persons or entities that did not have
28

1 California commercial cannabis license(s), as more particularly alleged in paragraphs 22 through
2 25, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

3 **SECOND CAUSE FOR DISCIPLINE**

4 (Failure to Record Commercial Cannabis Activity in CCTT)

5 27. Respondent is further subject to disciplinary action under Code section 26030,
6 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, subdivision
7 (b), 15049, subdivisions (b) and (d), and 15049.2, in that Respondent failed to record in CCTT
8 any of the cannabis and cannabis products Department investigators discovered on site, as more
9 particularly alleged in paragraphs 22 through 25, above, which are hereby incorporated by
10 reference and realleged as if fully set forth herein.

11 **THIRD CAUSE FOR DISCIPLINE**

12 (Failure to Affix Package Tags)

13 28. Respondent is further subject to disciplinary action under Code section 26030,
14 subdivisions (a) and (c), and California Code of Regulations, title 4, sections 15047.2, subdivision
15 (b), 15048.2, 15049, and 15049.2, subdivision (a), in that Respondent had cannabis and cannabis
16 products, on its licensed premises, that were not labeled and which did not have unique identifier
17 tags, as more particularly alleged in paragraphs 22 through 25, above, which are hereby
18 incorporated by reference and realleged as if fully set forth herein.

19 **FOURTH CAUSE FOR DISCIPLINE**

20 (Failure to Furnish Employment Records)

21 29. Respondent is further subject to disciplinary action under Code section 26030,
22 subdivisions (a) and (c), and California Code of Regulations, title 4, section 17800, in that
23 Respondent failed to provide employment records for its employee, as more particularly alleged
24 in paragraphs 22 through 25, above, which are hereby incorporated by reference and realleged as
25 if fully set forth herein.

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28 \\\

PRAYER

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

1. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis Distributor License Number C11-0001995-LIC, issued to Respondent California Harvest Fund LLC;

2. Revoking or suspending outright or suspending with terms and conditions or fining or any combination thereof, the Cannabis Manufacturer - Type 7 License Number DCC-10005051, issued to Respondent California Harvest Fund LLC;

3. Ordering Respondent California Harvest Fund LLC to pay the Department the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 26031.1;

4. Ordering the destruction of cannabis and cannabis goods in the possession of California Harvest Fund LLC at Respondent's expense, if revocation of Cannabis Distributor License Number C11-0001995-LIC is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a);

5. Ordering the destruction of cannabis and cannabis goods in the possession of California Harvest Fund LLC at Respondent's expense, if revocation of Cannabis Manufacturer - Type 7 License Number DCC-10005051 is ordered, pursuant to California Code of Regulations, title 4, section 15024.1, subdivision (a); and

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

DATED: September 29, 2025



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

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

In the Matter of the Accusation Against:

**CALIFORNIA HARVEST FUND LLC;
JASON TURCHIN, OWNER
15023 Ramona Blvd.**

Baldwin Park, CA 91706

**Cannabis Distributor License
No. C11-0001995-LIC
Cannabis Manufacturer - Type 7 License
No. DCC-10005051**

Respondent.

Case No. DCC25-0001410-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> at https://www.dca.ca.gov/about_us/entities.shtml.

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

In the Matter of the Accusation Against:

**CALIFORNIA HARVEST FUND LLC;
JASON TURCHIN, OWNER
15023 Ramona Blvd.**

Baldwin Park, CA 91706

**Cannabis Distributor License
No. C11-0001995-LIC
Cannabis Manufacturer - Type 7 License
No. DCC-10005051**

Respondent.

Case No. DCC25-0001410-INV

NOTICE OF DEFENSE

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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:

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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> at https://www.dca.ca.gov/about_us/entities.shtml.

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1 ROB BONTA
Attorney General of California
2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
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6 Facsimile: (916) 731-2126
E-mail: Matthew.Beasley@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. DCC25-0001410-INV

12 **CALIFORNIA HARVEST FUND LLC;**
13 **JASON TURCHIN, OWNER**
15023 Ramona Blvd.

REQUEST FOR DISCOVERY

14 **Baldwin Park, CA 91706**

15 **Cannabis Distributor License**
16 **No. C11-0001995-LIC**
Cannabis Manufacturer - Type 7 License
17 **No. DCC-10005051**

18 Respondent.

19 TO RESPONDENT:

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

24 PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE
25 HEREBY REQUESTED TO:

26 1. Provide the names and addresses of witnesses to the extent known to the Respondent,
27 including, but not limited to, those intended to be called to testify at the hearing, and
28

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

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 persons;

c. Statements of witnesses then proposed to be called by the Respondent 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 Respondent now proposes to offer in evidence;

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

f. Investigative reports made by or on behalf of the Respondent 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.

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

///

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

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

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

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

15
16 Dated: September 29, 2025

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

17
18
19 *Matthew S. Beasley*

MATTHEW S. BEASLEY
Deputy Attorney General
Attorneys for Complainant

20
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COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505

SECTION 11507.5: Exclusivity of discovery provisions

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

SECTION 11507.6: Request for discovery

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

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

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

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

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

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

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

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

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

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

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

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

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

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

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

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

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

Case Name: **In the Matter of the Accusation against California Harvest Fund LLC**

Case No.: **DCC25-0001410-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 **September 29, 2025**, I served the attached **STATEMENT TO RESPONDENT; ACCUSATION; NOTICE OF DEFENSE (2 COPIES); REQUEST FOR DISCOVERY; GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **STATEMENT TO RESPONDENT; ACCUSATION; NOTICE OF DEFENSE (2 COPIES); REQUEST FOR DISCOVERY; GOVERNMENT CODE SECTIONS 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 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, addressed as follows:

Jason Turchin
California Harvest Fund LLC
15023 Ramona Blvd.
Baldwin Park, CA 91706

Certified Article Number

9414 7266 9904 2247 7568 37

SENDER'S RECORD

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on **September 29, 2025**, at Los Angeles, California.

Michelle Sandoval
Declarant

Michelle Sandoval
Signature

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Exhibit 2

Copies of Licenses



Department of
Cannabis Control
CALIFORNIA

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

Cannabis Distributor License Adult-Use

Business Name:

California Harvest Fund LLC

California Harvest Fund LLC

License Number: C11-0001995-LIC

License Type: Distributor

The license authorizes California Harvest Fund 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:

15023 RAMONA BLVD
BALDWIN PARK, CA 91706

Valid: 4/4/2025

Expires: 4/4/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.



Valid:

4/4/2025

Expires:

4/4/2026

License No:

C11-0001995-LIC

Legal Business Name:

California Harvest Fund LLC

California Harvest Fund LLC

Premises Address:

15023 RAMONA BLVD

BALDWIN PARK, CA 91706

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C11-0001995-LIC.



Department of
Cannabis Control
CALIFORNIA



Department of
Cannabis Control
CALIFORNIA

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

CANNABIS MANUFACTURER LICENSE

Adult-Use

Business Name:

CALIFORNIA HARVEST FUND, LLC
California Harvest Fund, LLC

License Number: DCC-10005051

License Type: Annual A-Type 7: Volatile Solvent Extraction

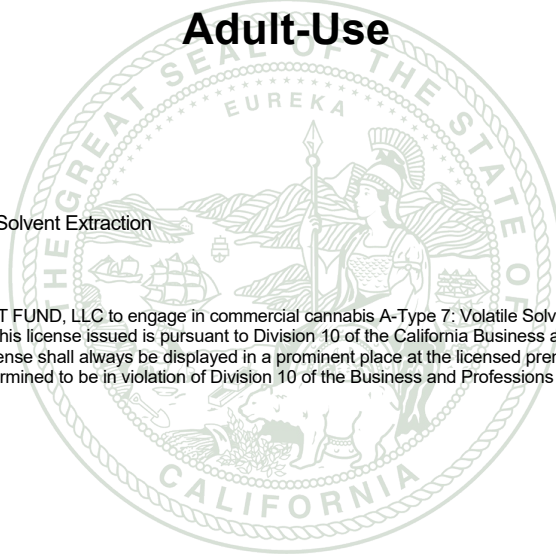
Premises Address:

15023 Ramona Blvd
Baldwin Park, CA 91706

Valid: 1/15/2025

Expires: 1/15/2026

The license authorizes CALIFORNIA HARVEST FUND, LLC to engage in commercial cannabis A-Type 7: Volatile Solvent Extraction at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.



Non-Transferable

Post in Public View

Exhibit 3

Agency Certification of Costs

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

In the Matter of the Accusation Against:

Case No. DCC25-0001410-INV

**CALIFORNIA HARVEST FUND LLC;
JASON TURCHIN, OWNER
15023 Ramona Blvd.
Baldwin Park, CA 91706**

**DECLARATION OF MONICA
THOMPSON REGARDING
INVESTIGATIVE ACTIVITY**

**Cannabis Distributor License
No. C11-0001995-LIC
Cannabis Manufacturer - Type 7 License
No. DCC-10005051**

Respondent.

I, Monica Thompson, declare and certify as follows:

1. I am employed as a Supervising Special Investigator (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 SSIs and Special Investigators (SI) were assigned to the investigation of this case, which was initially opened by the Department's Compliance Division on or about July 8, 2025: Lead SI Jeffrey Routsong; SI Eric Kinney; SI Joanne Alcala; SI Daniel Torres; SI Cory Pisciueneri; SI Kevin Cheng; SI Dustin Martinez; SSI II Daniel Briot; and Lead SSI I Monica Thompson.

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

8 5. The investigative activity summary entitled California Harvest Fund LLC
9 Certification of Cost Recovery was obtained from the Department's case management system and
10 includes the details of tasks performed by SIs and SSIs as maintained in the Department's case
11 management system. The costs related to investigative activity include field time, research and
12 report writing, meetings, and use of state vehicles. I hereby certify that the California Harvest
13 Fund LLC Certification of Cost Recovery, attached hereto and herein incorporated by reference is
14 a true and correct copy of the investigative activity for this case. The investigative activity
15 summary encompasses the total hours spent by the Department's ISB through August 19, 2025.
16 The investigative activity summary does not include tasks performed after this date.

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

21 a) Special Investigator Field Time:

22 Rate per hour: \$101.00 multiplied by 60 hours = \$6,060.00

23 b) Research and Report Writing:

24 Rate per hour: \$101.00 multiplied by 58 hours = \$5,858.00

25 c) Meetings:

26 Rate per hour: \$101.00 multiplied by 27 hours = \$2,727.00

27 d) Use of State Vehicles:

28 8 vehicle @ .58 per mile multiplied by 800 miles = \$464.00

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct and that this declaration was executed in Los Angeles County on
3 October 23, 2025.

4 Monica
5 Thompson

Digitally signed by Monica
Thompson
Date: 2025.10.23
14:40:28 -07'00'

6 Monica Thompson
7 *Declarant*

Last Name	First Name	Hourly Rate	Field Time	Research and Report	Meetings	Total Hours	Total Expense	
Lead SI, Routsong	Jeffrey	\$101.00	15		30	10	55	\$5,555.00
Supervising Special Investigator I, Thompson	Monica	\$101.00	5		8	5	18	\$1,818.00
Assisting SI, Alcala	Joanne	\$101.00	15		15	10	40	\$4,040.00
Assisting SI, Kinney	Eric	\$101.00	5		0		5	\$505.00
Assisting SI, Torres	Daniel	\$101.00	5		0		5	\$505.00
Assisting SI, Piscuneri	Cory	\$101.00	5		0		5	\$505.00
Assisting SI, Cheng	Kevin	\$101.00	5		0		5	\$505.00
Assisting SI, Martinez	Dustin	\$101.00	5		0		5	\$505.00
Supervising Special Investigator II, Briot	Daniel	\$101.00	0		5	2	7	\$707.00
								\$0.00
								\$0.00
								\$0.00
								\$0.00
Total Personnel Services								\$14,645.00
Total Personnel Services and Operating Expense								\$15,109.00

Operating Expense	Count	Miles	@.58 per
State Vehicles	8	800	\$464.00
U-Haul Rental			\$0.00
U-Haul Gas			\$0.00
Total Operating Expense			\$464.00

Exhibit 4

Certification of Prosecution Costs by California Department of Justice

1 ROB BONTA
Attorney General of California
2 GREGORY M. CRIBBS
Supervising Deputy Attorney General
3 MATTHEW S. BEASLEY
Deputy Attorney General
4 State Bar No. 288070
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6705
6 Facsimile: (916) 731-2126
E-mail: Matthew.Beasley@doj.ca.gov
7 *Attorneys for Complainant*

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

10 In the Matter of the Accusation Against:

Case No. DCC25-0001410-INV

11
12 **CALIFORNIA HARVEST FUND LLC;**
13 **JASON TURCHIN, OWNER**

CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF MATTHEW S.
BEASLEY

14 Respondent.

Business and Professions Code section
26031.1]

1 I, MATTHEW S. BEASLEY, hereby declare and certify as follows:

2 1. I am a Deputy Attorney General employed by the California Department of Justice
3 (DOJ), Office of the Attorney General (Office). I am assigned to the Cannabis Control Section in
4 the Civil Division of the Office. I have been designated as the representative to certify the costs
5 of prosecution by DOJ and incurred by the Department of Cannabis Control in this case. I make
6 this certification in my official capacity and as an officer of the court and as a public employee
7 pursuant to Evidence Code section 664.

8 2. I represent the Complainant, Evelyn Schaeffer, Deputy Director of the Compliance
9 Division of the Department of Cannabis Control, in this action. I was assigned to handle this case
10 on or about September 9, 2025.

11 3. Our Office's computerized case management system reflects that the following
12 persons have also performed tasks related to this matter: Gregory M. Cribbs, Supervising Deputy
13 Attorney General; Harinder K. Kapur, Senior Assistant Attorney General; and Helen Koh,
14 Paralegal.

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

20 5. On October 23, 2025, I requested a billing summary for this case from the
21 Accounting Department of the DOJ. In response, on October 23, 2025, I received a document
22 entitled "Matter Time Activity by Professional Type." I hereby certify that the Matter Time
23 Activity by Professional Type, appended hereto as Exhibit A, and herein incorporated by
24 reference, is a true and correct copy of the billing summary for this matter that I received from the
25 Accounting Department. The summary includes the billing costs incurred by me, as well as
26 other professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the
27 amount of time billed for the activity, and the billing rate by professional type. The billing
28 summary is comprehensive of the charges by the Office to the Department of Cannabis Control

1 through October 22, 2025. It does not include billing for tasks performed after October 22, 2025,
2 up to the date of hearing.

3 6. Based upon the time reported through October 22, 2025, as set forth in Exhibit A,
4 DOJ has billed the Department of Cannabis Control \$2,656.50 for the time spent working on the
5 above entitled case.

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

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

10 Executed on October 23, 2025.

11
12 */s/ Matthew S. Beasley*

13 _____
14 MATTHEW S. BEASLEY
15 Deputy Attorney General
16 Declarant

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18 Declaration of Costs.docx
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Exhibit A



Matter Time Activity By Professional Type

As of Oct 23, 2025

Matter ID: LA2025802850					Date Opened: 08/25/2025				
Description: California Harvest Fund LLC (ACC)									
Professional Type: Attorney									
Fiscal Year: 2025									
Professional: Gregory M. Cribbs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605823339	9/29/25	CV-CCS:290	02668	Supervisory Review	0.75	\$228.00	\$171.00		9/30/25
Gregory M. Cribbs Totals:					0.75		\$171.00		
Professional: Harinder K. Kapur									
803289012	9/26/25	CV-CCS:290	02668	Supervisory Review	0.50	\$228.00	\$114.00		9/30/25
Harinder K. Kapur Totals:					0.50		\$114.00		
Professional: Matthew S. Beasley									
605790107	9/9/25	CV-CCS:290	02668	Case Management	0.50	\$228.00	\$114.00		9/30/25
605815937	9/24/25	CV-CCS:290	02668	Client Communication	0.50	\$228.00	\$114.00		9/30/25
605815939	9/24/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		9/30/25
605818065	9/25/25	CV-CCS:290	02668	Pleading Preparation	1.75	\$228.00	\$399.00		9/30/25
605821400	9/26/25	CV-CCS:290	02668	Pleading Preparation	1.50	\$228.00	\$342.00		9/30/25
605821457	9/29/25	CV-CCS:290	02668	Client Communication	0.75	\$228.00	\$171.00		9/30/25
605823948	9/29/25	CV-CCS:290	02668	Pleading Preparation	0.75	\$228.00	\$171.00		9/30/25
605823959	9/30/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		9/30/25
605832136	10/2/25	CV-CCS:290	02668	Research	0.25	\$228.00	\$57.00		
605839255	10/7/25	CV-CCS:290	02668	Research	0.25	\$228.00	\$57.00		
605844591	10/10/25	CV-CCS:290	02668	Research	0.25	\$228.00	\$57.00		
605854526	10/16/25	CV-CCS:290	02668	Analysis/Strategy	0.25	\$228.00	\$57.00		
605859409	10/20/25	CV-CCS:290	02668	Client Communication	0.25	\$228.00	\$57.00		
605861950	10/20/25	CV-CCS:290	02668	Case Management	0.25	\$228.00	\$57.00		
Matthew S. Beasley Totals:					9.00		\$2,052.00		
2025 Totals:					10.25		\$2,337.00		
Attorney Totals:					10.25		\$2,337.00		



Matter Time Activity By Professional Type

As of Oct 23, 2025

Matter ID: LA2025802850					Date Opened: 08/25/2025				
Description: California Harvest Fund LLC (ACC)									
Professional Type: Paralegal									
Fiscal Year: 2025									
Professional: Helen Koh									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
803250767	8/25/25	CV-CCS:290	02668	Case Management	1.00	\$213.00	\$213.00		8/31/25
803266792	9/9/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		9/30/25
803286213	9/24/25	CV-CCS:290	02668	Case Management	0.25	\$213.00	\$53.25		9/30/25
Helen Koh Totals:					1.50		\$319.50		
2025 Totals:					1.50		\$319.50		
Paralegal Totals:					1.50		\$319.50		
LA2025802850 Totals:					11.75		\$2,656.50		

Exhibit 5

Investigative Report (without attachments)

INVESTIGATION REPORT

STATE OF CALIFORNIA



Department of
Cannabis Control
CALIFORNIA



CASE INFORMATION

Case Number DCC25-0001410-INV	Date Received July 8, 2025
License Number C11-0001995-LIC and DCC-10005051	Legal Business Name of Licensee or Unlicensed Party California Harvest Fund LLC
DBA	Premises Address 15023 Ramona Blvd Baldwin Park CA 91706
Business Phone Number (818) 968-2440	Author's Name Joanne Alcala / 4033
Date of Incident July 15, 2025	Location of Incident 15023 Ramona Blvd Baldwin Park CA 91706

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

Name (First, Middle, Last) Jason E Turchin	Title Owner Applicant / Business Owner
Address (include street, city, state, and zip code) 15023 Ramona Blvd Baldwin Park CA 91706	
E-mail Address jturch@trexdistribution.com	Phone Number 818-212-1833 & 818-518-6713

Miscellaneous Information
As of July 17, 2025, the Department of Cannabis Control's (DCC) licensing database, Accela, shows Jason Turchin is 100% owner of California Harvest Fund LLC (C11-0001995-LIC and DCC-10005051).

SUMMARY

On July 15, 2025, Special Investigators Joanne Alcala (Alcala) and Jeffrey Routsong (Routsong) investigated a complaint alleging that a minor was living and assisting at the licensed premises. During the inspection, we met with Michael Trevino (Trevino), a consultant for the licensee, who stated that an individual named Adrian had previously stayed at the facility as a security guard but left two to three weeks ago to be with his pregnant girlfriend and was not expected to return. No minors were observed during the inspection, and no evidence confirmed the presence of a minor.

We conducted an inspection of the distribution license (C11-0001995-LIC) and manufacturing license (DCC-10005051), during which several violations were observed on both licenses. Trevino was unable to confirm whether the facility's surveillance system was operational. In the men's locker room, male clothing and shoes were found, which Trevino said may have belonged to Adrian.

In the employee lounge break room, jars of cannabis distillate were found stored in a refrigerator. Additional unlabeled and unsourced cannabis and hemp products were discovered throughout the premises, including bagged cannabis in a freezer, Oregon hemp and unlabeled cannabis in black totes in the grinding room, distillate in the trim storage and waste disposal areas, supersacks of cannabis trim, infused vapes labeled from Arizona, and a pallet of Delta-8 hemp gummies in the packaging room, which Trevino said were approximately five years old and expired. Trevino claimed the cannabis products were for research and development, but no documentation was provided to support this. Due to the large volume of untagged and unsourced cannabis and cannabis products on site, Department staff determined to place the items under embargo and called additional DCC staff to assist with the embargo process.

DCC-010 (02/2023)



BACKGROUND

California Harvest Fund LLC was granted a distributor license number C11-0001995-LIC, on April 4, 2025, and credential in METRC on May 7, 2025. The distribution license is set to expire on April 4, 2026.

California Harvest Fund LLC was also granted a type seven (7) volatile solvent extraction license number DCC-10005051, on January 15, 2025, and credential in METRC on February 13, 2025. The manufacturing license is set to expire on January 15, 2026.

California Harvest Fund LLC distribution and manufacturing licenses have no previous administrative action or disciplinary history listed in the DCC databases.

The Investigate Services Branch (ISB) received a complaint, reference DCC25-0005954-COMP, alleging that a minor was living and assisting at the licensed premises.

CASE NARRATIVE

On July 8, 2025, I, SI Joanne Alcala, was assigned this case (DCC25-0001410-INV) and instructed by Supervising Special Investigator I (SSI), Monica Thompson (Thompson), to conduct a compliance inspection of the licensed premises on July 15, 2025, due to a complaint alleging that a minor was living and assisting at the licensed facility.

On July 9, 2025, I searched for California Harvest Fund LLC in the DCC's licensing database, Accela, and reviewed its METRC accounts. The review showed no inventory listed under the Packages Inventory tab and no incoming or outgoing transfers for both the distribution license and the manufacturing license (**Attachment A**). Per Accela, Jason Turchin (Turchin) is listed as Owner Applicant/Designated Responsible Party and Business Owner for California Harvest Fund LLC (distribution and manufacturing licenses).

On July 15, 2025, at approximately 12:45 p.m., Special Investigators (SIs) Jeff Routsong (Routsong) and I arrived at the licensed premises, located at 15023 Ramona Blvd, in the City of Baldwin Park. Upon arrival, two unidentified males were observed exiting the facility. They did not return during the compliance inspection.

There was no doorbell or any other device to notify the licensee's staff of our presence (**Attachment B**). I called Owner Turchin, at (818) 968-2440, which is the listed contact number for the business in Accela. He answered, and I identified myself and explained that we were onsite to conduct a compliance inspection on the distribution licensed. I also mentioned that we had observed two individuals exiting the premises. Turchin confirmed they were employees who had stepped out for lunch and asked if we could wait approximately 30 minutes. I agreed.

Turchin asked about the purpose of the inspection, and I informed him it was a routine compliance inspection. When he asked why he wasn't notified in advance, I explained that inspections are unannounced, and Department staff have immediate access to licensed premises; denying access would be a regulatory violation. He responded, "Oh okay, that's not a problem." Approximately 20 minutes later, Turchin called me again and asked what prompted the inspection. He was told again that it was a routine regulatory compliance inspection. Turchin expressed concern about the timing, noting the City of Baldwin Park had recently visited his facility, and said the situation made him nervous. He mentioned he had contacted his attorney and ultimately stated he welcomed the inspection.

At approximately 2:00p.m., Turchin called again and said his employees were uncomfortable returning without him. He offered to connect us with his attorney. After waiting over an hour for access, I reiterated that if no one returned to grant entry, or if he couldn't ensure access for department staff, it would be considered a denial of access. Turchin said he would call back. About a minute or two after Turchin stated he would call back, a male individual exited the facility and identified himself as Michael Trevino (Trevino), a consultant working with Turchin. Trevino granted us access and provided a walkthrough of the entire facility which includes the



distribution and manufacturing license (**Attachment C**).

During the inspection, I entered the men's locker room and observed men's clothing and shoes. When asked about these items, Trevino stated they may belong to an individual named Adrian (last name unknown), who had been staying at the facility as a security guard. Trevino stated that Adrian left two to three weeks earlier to be with his pregnant girlfriend and was not expected to return (**Attachment D**).

When I requested employee records for Adrian, Trevino stated that none were available. No physical or documentary evidence was found confirming the presence or employment of a minor on site.

In the employee break room under the distribution (C11-0001995-LIC) and manufacturing license (DCC-10005051), I observed multiple jars of cannabis distillate stored in the refrigerator freezer. Trevino confirmed additional cannabis products were stored onsite and that none had been entered into METRC (**Attachment E**).

Inside the walk-in freezers under the manufacturing license, one freezer contained bagged cannabis products stored in blue bins, none of which had visible METRC tags. The second freezer was empty (**Attachment F**).

Under the same manufacturing license, I found black totes filled with unlabeled cannabis, transparent round bags containing cannabis shake, and additional jars of distillate (**Attachment G**).

In the trim storage room under the manufacturing license, I observed one large white supersack filled with cannabis trim and several boxes containing jars of distillate (**Attachment H**).

In total, I observed three large white supersacks filled with cannabis trim—one located under the manufacturing license and two under the distribution license (**Attachment I**).

In the packaging room under the distribution license, I observed a pallet of boxes. Upon opening the boxes, I found Delta-8 hemp gummies in various flavors and potencies. Trevino stated the gummies were approximately five years old and expired (**Attachment J**).

I also discovered out-of-state products onsite, including hemp labeled from Oregon sources such as Fire Group LLC and five packages of pre-rolls (totaling 100 units) labeled as shipped from Mesa, Arizona (**Attachment K**).

All unsourced cannabis and hemp products located at the site were placed under embargo due to the absence of required documentation, including shipping manifests, and METRC tags (**Attachment L**). None of the observed products had visible labels or documentation to identify traceability or their source.

The few METRC tags that were located were scanned and confirmed to be associated with finished goods unrelated to the products observed during the inspection (**Attachment M**). Based on my training and experience, this suggests the inventory was either improperly tracked, never entered into METRC, or unlawfully acquired.

The presence of untraceable and undocumented cannabis products under both the distribution and the manufacturing licenses, combined with the uncertainty surrounding the facility's surveillance system, poses a significant risk of diversion and constitutes a serious violation of state cannabis regulations. As a result, all non-compliant products were placed under embargo pending further enforcement review by the Department. Due to the number of non-compliant cannabis products, additional DCC staff arrived to assist with the embargo. Staff included: SI Eric Kinney, SI Kevin Cheng, SI Dustin Martinez, SI Cory Piscineri, and SI Daniel Torres. Trevino sign the Initial Notice of Embargo (INE), and a copy was sent to Turchin at jturch@trexdistribution.com (**Attachment N**). The embargo was concluded at approximately 8:30p.m., and we departed the premises at approximately 9:00p.m.

On July 17, 2025, I emailed Turchin at jturch@trexdistribution.com the Supplemental Notice of Embargo (SNE). On July 23, 2025, I received Turchin's response to the SNE. In his response, Turchin stated that on July 15,



INVESTIGATION REPORT (continued)

2025, he was informed by Trevino about non-compliant cannabis products that had been discovered on the licensed premises without proper documentation, traceability, or UID tags. He acknowledged that these products did not meet regulatory requirements. Turchin also indicated that he intends to destroy all embargoed products identified during the inspection (**Attachment O**).

On July 16, 2025, City of Baldwin Park, Inspector Nick Baldwin (Baldwin), called SSI Thompson regarding DCC's inspection on July 15, 2025. Baldwin stated City of Baldwin Park representatives visited the premises last week on July 9, 2025, and there was no cannabis or cannabis products observed during their inspection. (**Attachment P**). Their inspection was to determine if the licensee met certain criteria (undisclosed) for the city to authorize a local permit and the council meeting was to be held tonight (July 16, 2025) at 7 PM.

On July 17, 2025, Inspector Baldwin, emailed SSI Thompson and I, stating the City of Baldwin Park, Community Development Department "elected to pull the project from the agenda of last night's meeting, so the local approval for California Harvest Fund LLC was not granted yesterday" (**Attachment Q**).

On July 24, 2025, Inspector Baldwin, SI Routsong, and I arrived at the licensed premises and were granted access by Trevino. The purpose of the inspection was to confirm that the embargoed products remained untouched and that no cannabis goods were being manufactured. We observed that the facility remained unchanged from the initial inspection on July 15, 2025. The embargo seals on all the doors were observed to be intact.

That same day, I spoke with Turchin by phone, and he requested that DCC staff be present for the destruction of the embargoed products. Later that evening, he emailed SI Routsong and I confirming that the voluntary condemnation and destruction (VC&D) was scheduled for Tuesday, July 29, 2025 (**Attachment R**).

On July 29, 2025, SI Routsong and I arrived at the licensed premises at approximately 8:30 a.m. to witness the VC&D. We confirmed that the embargoed products remained untouched and that the embargo seals on all doors were still intact. Ecowaste arrived at approximately 9:30 a.m. and began the disposal of the embargoed cannabis products and goods. However, due to the size of the three supersack bags, each capable of holding up to 500 lbs. Ecowaste had to dispatch a larger truck. SI Routsong and I remained at the premises until the second truck arrived at approximately 12:45 p.m. to complete the disposal of the supersack bags (**Attachment S**).



WITNESS LIST

Witness #1

- Name: Joanne Alcala
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: 916-618-8958
- E-mail: joanne.alcala@cannabis.ca.gov
- Miscellaneous information: Lead

Witness #2

- Name: Jeffrey Routsong
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: 831-206-2661
- E-mail: Jeffrey.Routsong@cannabis.ca.gov
- Miscellaneous information: Lead

Witness #3

- Name: Cory Pisciuneri
- Title/Position: Special Investigator
- Address: Riverside
- Phone: 916-956-6329
- E-mail: cory.pisciuneri@cannabis.ca.gov
- Miscellaneous information: Assisted during the embargo.

Witness #4

- Name: Kevin Cheng
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: 279-239-0391
- E-mail: kevin.cheng@cannabis.ca.gov
- Miscellaneous information: Assisted during the embargo.

Witness #5

- Name: Dustin Martinez
- Title/Position: Special Investigator
- Address: Riverside
- Phone: 916-251-4599
- E-mail: dustin.martinez@cannabis.ca.gov
- Miscellaneous information: Assisted during the embargo.

Witness #6

- Name: Daniel Torres
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: 279-234-8323
- E-mail: Daniel.Torres@cannabis.ca.gov
- Miscellaneous information: Assisted during the embargo.

Witness #7

- Name: Eric Kinney
- Title/Position: Special Investigator
- Address: Los Angeles
- Phone: 279-220-5477
- E-mail: Eric.Kinney@cannabis.ca.gov



INVESTIGATION REPORT (continued)

- Miscellaneous information: Assisted during the embargo.

PREPARER

Name	Title
Joanne Alcala	Special Investigator
Signature	
	

REVIEWER

Name	Title
Monica Thompson	Supervising Special Investigator I
Signature	Date
	

LIST OF ATTACHMENTS

- A. Packages Adjustment Report & Transfer Manifest Packages Adjustment Report & Transfer Manifest.
- B. Picture of the front of the building.
- C. Walkthrough of facility (Pictures).
- D. Men's Locker room.
- E. Employee break room (picture jars).
- F. Picture of walk-in freezer.
- G. Pictures of Cannabis product and goods.
- H. Pictures of Cannabis product and goods.
- I. Pictures of Cannabis product supersack bags.
- J. Pictures of Delta 8 Gummies.
- K. Pictures of Out of State product.
- L. Initial Embargo Notice & Supplemental Embargo Notice.
- M. METRC Tag found Associated with finish goods.
- N. Emailed Initial notice of embargo to Jason E Turchin.



INVESTIGATION REPORT (continued)

- O. Supplemental notice of embargo & SNE LICENSEE RESPONSE.
- P. Email between DCC and Inspector Nick Baldwin City of Baldwin Park.
- Q. Email from Inspector Baldwin indicating pulling project from agenda.
- R. Email from Turchin requesting to VC&D embargo product.
- S. VC&D form, Ecowaste Invoice, & VC&D pictures.

PROOF OF SERVICE

Case Name: In the Matter of the Accusation Against: California Harvest Fund LLC

DCC Case No. DCC25-0001410-INV

License Number: C11-0001995-LIC, Distributor; DCC-10005051, Manufacturer-Type 7

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Department of Cannabis Control, 2920 Kilgore Road, Rancho Cordova, CA 95670. On October 29, 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.

California Harvest Fund LLC
Jason Turchin, Owner
15023 Ramona Blvd.
Baldwin Park, CA 91706
Certified Mail No. 7022 1670 0001 3411 3813
jturch@trexdistribution.com

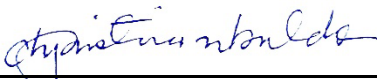
Evelyn Schaeffer (email only)
Deputy Director
Compliance Division
Department of Cannabis Control
Evelyn.Schaeffer@cannabis.ca.gov

Matthew S. Beasley (email only)
Deputy Attorney General
Cannabis Control Section
Office of the Attorney General
Matthew.Beasley@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 October 29, 2025, at Rancho Cordova, California.



Christina C. Ubaldo