

# Canna-Greed

## *A Judicially Confirmed Case of Public Corruption*

### *In Baldwin, California Cannabis Licensing*

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September 30, 2025

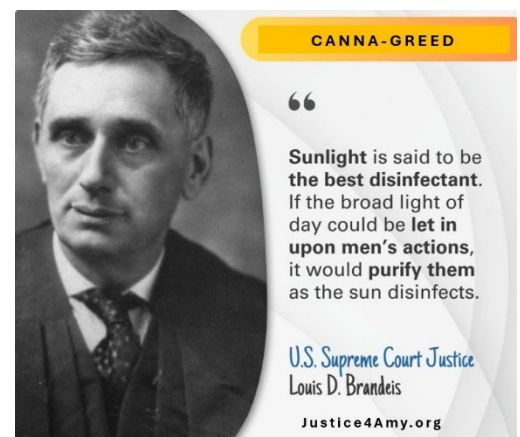
## OVERVIEW

This is a public integrity case which involved the City of Baldwin Park, CA and certain high-ranking, bad-actor, employees who engaged in a corrupt, pay-to-play scheme that sold adult-use cannabis licenses to those select few who would pay large sums of cash to these employees to guarantee these highly coveted licenses to the select few.

This ongoing scheme resulted in a federal complaint being filed on February 23, 2023, which alleged that the CITY OF BALDWIN PARK and certain individuals who worked for Baldwin Park conspired to profit personally from these pay-to-play licensing activities. The Baldwin Complaint alleges:

1. VIOLATIONS OF RACKETEER INFLUENCED CORRUPT ORGANIZATIONS ACT [RICO VIOLATIONS BASED ON BRIBERY. KICKBACKS. FRAUD AND CONSPIRACY];
2. INVERSE CONDEMNATION/TAKING (U.S. CONST. 5<sup>TH</sup> AMEND.);
3. VIOLATIONS OF CIVIL RIGHTS [42 U.S.C. § 1983];
4. NEGLIGENCE;
5. FRAUD;
6. DECLARATORY RELIEF

For those who would like to see this form of public corruption exposed, the Baldwin Complaint has everything in it. The lawyers for both sides *aggressively* played every card one could think of to win this case. The stakes were enormous. A win by the Plaintiff would expose other local governments who had engaged in these processes what could only be seen as a ripe environment to hold those in government, and their allies, accountable for similar activities that, until Baldwin, allowed these activities to go on without fear of exposure or legal repercussions<sup>1</sup>. The Baldwin case changed everything when on



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<sup>1</sup> For years, other [local governments](#) who have engaged in the exact same Baldwin Park type corruption in their adult-use cannabis licensing programs would have to include San Diego, CA. Despite having exposed these practices by virtue of numerous, [public record](#) act requests, [21 grand jury complaints](#), superior and federal court complaints as well as having brought this information to the [Public Integrity Unit of the FBI](#) over the course of 8 years, not a single corrective action has

September 16, 2025, a jury voted unanimously to award Plaintiffs \$1.6M in damages for what can only be described as a city, replete with bad-actors and policies that allowed these activities to flourish to be finally held accountable for the fraud and corruption we see so often in the CA adult-use licensing scheme. (See the [September 29, 2025, SF GATE article by Lester Black.](#))

## **CASE LINKS**

### **UNITED STATES DISTRICT COURT CENTRAL DISTRICT**

DJCBP CORPORATION DBA TIER ONE CONSULTING, a California Corporation and David Ju, an individual v. CITY OF BALDWIN PARK, et al, Case No.: 2:23-CVp00384

[2023.01.18 Complaint \(ECF-1\)](#)

[2023.02.23 Defendant's Motion to Dismiss \("MTD" at ECF-14\)](#)

[2023.02.23 Defendant's Request for Judicial Notice in support of \("iso"\) MTD \(ECF-15\)](#)

[2023.03.05 Plaintiff's Opposition \("OPP"\) to MTD \(ECF-16\)](#)

[2023.03.12 Defendant's Reply re MTD \(ECF-18\)](#)

[2023.04.14 Civil Minutes \(ECF-24\)](#)

[2023.04.23 Plaintiff's First Amended Complaint \("FAC" at ECF-25\)](#)

[2023.07.13 Defendant's Motion for Judgment on the Pleadings \("JOP" at ECF-27\)](#)

[2023.07.16 Defendant's Motion to Dismiss FAC \(ECF-29\)](#)

[2023.07.24 Plaintiff's OPP to MTD \(ECF-31\)](#)

[2023.07.24 Declaration \("DEC"\) by Plaintiff's Counsel in OPP to JOP \(ECF-31-1\)](#)

[2023.07.31 Defendant's Reply iso JOP \(ECF-32\)](#)

[2023.08.03 Minutes \(ECF-33\)](#)

[2023.08.07 Plaintiff's OPP to Willoughby's MTD FAC \(ECF-34\)](#)

[2023.08.07 DEC by Plaintiff's Counsel iso OPP for Defendant's MTD \(ECF-34-1\)](#)

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ever been taken. In San Diego, these activities **continues unabated!** There have been certain bad actor attorneys, lobbyists and government officials who have ALL [profited greatly at the expense of San Diego citizens and taxpayers](#). The corruption that is San Diego, a 100X factor when compared with Baldwin, the adult-use cannabis licensing corruption has been fully documented in the litigation sections of both the [Justice4Amy.org](#) and the [151Farmers.org](#) websites.

[2023.08.21 Defendant Willoughby's Reply iso MTD FAC \(ECF-35\)](#)

[2023.08.28 Civil Minutes \(ECF-37\)](#)

[2023.08.31 MTD on behalf of Baldwin Park Individual Defendant's \(ECF-38\)](#)

[2023.09.07 Stipulation to File Responsive Pleadings \(ECF-40\)](#)

[2023.09.12 MTD on behalf of Defendant's \(ECF-44\)](#)

[2023.09.18 Plaintiff's Second Amended Complaint \("SAC" at ECF-43\)](#)

[2023.09.29 Defendant Morales MTD and Strike \(ECF-46\)](#)

[2023.10.08 Defendant Morales MTD SAC \(ECF-47\)](#)

[2023.10.09 Joint MTD \(ECF-48\)](#)

[2023.10.09 Baldwin Park MTD \(ECF-49\)](#)

[2023.10.19 Defendant Morales Reply iso MTD \(ECF-56\)](#)

[2023.11.27 Civil Minutes \(ECF-66\)](#)

[2023.12.22 Plaintiff's Third Amended Complaint \("TAC" at ECF-70\)](#)

[2024.03.15 Civil Minutes \(ECF-91\)](#)

[2024.03.29 Defendant Willoughby's Cross Complaint \("X Complaint" at ECF-99\)](#)

[2024.04.04 Baldwin Parks First Amended \("FA"\) X Complaint \(ECF-106\)](#)

[2024.04.19 Defendant Willoughby's FA X Complaint \(ECF-108\)](#)

[2024.04.21 Stipulation to Continue Discovery for 90 Days \(ECF-149\)](#)

[2024.04.25 Plaintiffs MTD Baldwin Parks FA X Complaint \(ECF-111\)](#)

[2024.04.25 DEC by Plaintiff's Counsel iso MTD FA X Complaint \(ECF-111-1\)](#)

[2024.04.30 Plaintiff's Joint Scheduling Report \(ECF-112\)](#)

[2024.04.30 Plaintiff's Joint Scheduling Report \(ECF-113\)](#)

[2024.05.28 Civil Minutes \(ECF-121\)](#)

[2024.06.24 Civil Minutes \(ECF-126\)](#)

[2024.12.11 Counter Defendants' Answer to City's FAX Complaint \(ECF-131\)](#)

[2024.12.11 Counter Defendants' Answer to Amended Counter Complaint \(ECF-132\)](#)

[2025.01.02 Baldwin Parks MTS and Entry of Default Judgment \(ECF-133\)](#)

[2025.01.20 Stipulation of Dismissal of Willoughby \(ECF-136\)](#)

[2025.01.20 Stipulation of Dismissal of Willoughby's Counter Claims \(ECF-137\)](#)

[2025.01.24 ORDER \(ECF-140\)](#)

[2025.01.24 ORDER \(ECF-141\)](#)

[2025.03.11 Civil Minutes \(ECF-146\)](#)

[2025.07.09 Plaintiff's Motion in Limine \("MIL"\) No 1 \(ECF-157\)](#)

[2025.07.09 Plaintiff's MIL No 2 \(ECF-158\)](#)

[2025.07.09 Plaintiff's MIL No 3 \(ECF-159\)](#)

[2025.07.09 Plaintiff's MIL No 3 \(ECF-160\)](#)

[2025.07.10 Defendant's MIL No 1 \(ECF-163\)](#)

[2025.07.10 Defendant's MIL No 2 \(ECF-164\)](#)

[2025.07.10 Defendant's MIL No 3 \(ECF-165\)](#)

[2025.07.10 Defendant's MIL No 4 \(ECF-166\)](#)

[2025.07.21 Civil Minutes \(ECF-171\)](#)

[2025.07.21 Plaintiff's OPP to Defendants MIL No 1 \(ECF-172\)](#)

[2025.07.21 Plaintiff's OPP to Defendants MIL No 2 \(ECF-173\)](#)

[2025.07.21 Plaintiff's Witness List \(ECF-176\)](#)

[2025.07.21 Plaintiff's Joint Exhibit List \(ECF-177\)](#)

[2025.07.22 Defendant's OPP to Plaintiff's MIL No 1 \(ECF-179\)](#)

[2025.07.22 Defendant's OPP to Plaintiff's MIL No 2 \(ECF-180\)](#)

[2025.07.22 Defendant's OPP to Plaintiff's MIL No 3 \(ECF-181\)](#)

[2025.07.22 Defendant's OPP to Plaintiff's MIL No 4 \(ECF-182\)](#)

[2025.07.23 Defendant's Witness List \(ECF-183\)](#)

[2025.07.23 Baldwin Parks Contention of Facts and Law \(ECF-184\)](#)

[2025.07.31 Plaintiff's Compelling Deposition and Request for Sanctions \(ECF-192\)](#)

[2025.08.06 Plaintiff's Compelling Deposition and Request for Sanctions \(ECF-195\)](#)

[2025.08.11 Civil Minutes \(ECF-198\)](#)

[2025.08.12 Defendant's Request for Judicial Notice of Writ of Mandate \(ECF-200\)](#)

[2025.08.13 Defendants'-Cross Complainants' Motion for Protective Order \(ECF-202\)](#)

[2025.08.13 Plaintiff's OPP to Protective Order \(ECF-203\)](#)

[2025.08.13 Defendants' Reply to Plaintiff's OPP to Protective Order \(ECF-204\)](#)

[2025.08.14 Civil Order \(ECF-205\)](#)

[2025.08.20 Plaintiff's FA Witness List \(ECF-210\)](#)

[2025.08.20 Civil Minutes \(ECF-212\)](#)

[2025.08.21 Defendants' Portion of the FA Final Pretrial Conference Order \(ECF-213\)](#)

[2025.08.22 Civil Minutes \(ECF-214\)](#)

[2025.08.22 Defendants' Initial Disclosures \(ECF-215\)](#)

[2025.08.29 Defendants' Motion for JOP \(ECF-219\)](#)

[2025.09.03 Plaintiff's Motion for Attorney's Fees and Costs \(ECF-221\)](#)

[2025.09.08 Plaintiff's FA Final Pretrial Conference Order \(ECF-224\)](#)

[2025.09.09 Civil Minutes \(ECF-225\)](#)

[2025.09.10 Civil Minutes \(ECF-226\)](#)

[2025.09.11 Plaintiff's Trial Brief re Notary Fraud \(ECF-229\)](#)

[2025.09.11 Civil Minutes \(ECF-230\)](#)

[2025.09.11 Defendant's Motion to DQ Plaintiff's Counsel \(ECF-231\)](#)

[2025.09.12 Plaintiff's OPP to Defendant's Motion to Disqualify \("DQ"\) Plaintiff's Counsel \(ECF-232\)](#)

[2025.09.12 DEC of Plaintiff's Counsel iso OPP to Defendant's Motion to DQ \(ECF-232-1\)](#)

[2025.09.15 Civil Minutes \(ECF-235\)](#)

[2025.09.16 ORDER to the US MARSHALL \(ECF-236\)](#)

[2025.09.16 List of Exhibits and Witnesses \(ECF-237\)](#)

[2025.09.16 Jury Note-Unanimous Verdict \(ECF-239\)](#)

[2025.09.16 Baldwin Park Jury Verdict Form \(ECF-240\)](#)

[2025.09.16 Receipt for Release of Exhibits \(ECF-241\)](#)

[2025.09.18 Defendant's Reply iso the MTD \(ECF-243\)](#)

[2025.09.19 Civil Minutes re Defendant's Motion for Judgment as a Matter of Law \(ECF-244\)](#)

[2025.09.22 Civil Minutes \(ECF-245\)](#)