

## SECTION 11.17.2: LINKS SUMMARY

### DCC SECTION 81008 RELATED

*The exit email says Compliance leadership knew and did nothing. Statements of Economic Interests — Form 700 — are the public documents that would show whether there was a reason. These are the requests for them, and the Department's answers.*

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### 2026.08.26 — DCC Conflict of Interest Code (produced by DCC)

The Department attached this to its own response and, in doing so, refuted the answer it was giving. Asked for Form 700s, the Department referred everything to the Fair Political Practices Commission. Page 1 of the code it attached says the opposite:

**“The Director must file their statements of economic interests electronically with the Fair Political Practices Commission. All other individuals holding designated positions must file their statements with the Department.”**

So the Department is the filing officer for its own Special Investigators, Supervisory Special Investigators, Compliance and Enforcement deputy directors, and attorneys — every position at issue except the Director.

The second finding is in the appendix. Compliance, Enforcement, Licensing and External Affairs staff are assigned **Category 3** disclosure, which compels reporting of income, gifts, loans, travel payments and business positions from any entity subject to the Department's licensing jurisdiction — **expressly including anyone who operated without a licence.**

Off-ramps — jump straight to the record:

- ▶ Page 1 — who files with the Commission, and who files with the Department. p. 1
- ▶ Compliance Division designated positions — Special Investigator and Supervisory Special Investigator, Category 3. p. 3
- ▶ Executive Division — Director, Chief Deputy Director, General Counsel. p. 4
- ▶ Category 3 defined — income, gifts, loans and travel payments from any entity subject to the Department's jurisdiction, “even if the individual or entity has failed to seek a license.” p. 8
- ▶ The certification — FPPC approval 15 November 2022, Secretary of State filing 1 February 2023, effective **3 March 2023**. p. 10

*That effective date is itself an open question. The Department has existed since July 2021. Either an earlier code was withheld, or none was in force for the Department's first twenty months — the window the exit email concerns.*

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#### **2026.09.04 — DCC Email Thread re the Investigative Report and Licensing Records Request (14-day extension notice)**

The August 26 request for the investigative report the exit email describes — the 75,977-plant CCTT falsification, the briefings to Compliance leadership, the application and ownership files for the two licensed companies. The Department's answer, nine days later, was a fourteen-day extension.

Government Code section 7922.535(b) permits an extension only in enumerated "unusual circumstances," by notice stating the reason and the date a determination is expected. The notice states that the Department is "gathering, collecting, and reviewing records" and gives no date.

Off-ramps — jump straight to the record:

- ▶ The request — the investigative report, the briefings, the ownership and financial-interest-holder disclosures, the background checks. p. 3
  - ▶ The Department's entire determination. p. 1
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#### **2026.09.05 — DCC Email Thread re Section 81008 Request (Form 700s)**

Four messages. The August 26 request, the Department's referral to the FPPC that same afternoon, the same-day correction quoting the Department's own code back to it, and then — after ten days of silence — the letter below.

Off-ramps — jump straight to the record:

- ▶ The original request, 26 August, 9:03 a.m. p. 1
  - ▶ The Department's referral to the FPPC, 3:47 p.m. p. 3
  - ▶ The correction, 4:51 p.m. — quoting page 1 of the Department's own code. p. 5
  - ▶ The transmittal of the full package, 5 September. p. 6
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#### **2026.09.05 — Cotton to DCC, Section 81008 Letter and Exhibits A-F**

Forty-six pages. Section 81008 requires that statements filed under the Political Reform Act be open for inspection no later than the second business day after a request is received. From the Department's 26 August receipt, that date was **28 August**. It passed. Section 81008 contains no determination period and no extension mechanism — so unlike the two Public Records Act requests the Department answered on 4 September, this one cannot be extended.

The letter concedes what the Department got right, narrows one item, and presses four that remain open.

Off-ramps — jump straight to the record:

- ▶ The letter — the availability date, the referral refuted by the Department’s own code, and the four outstanding items. p. 001
  - ▶ Index of exhibits. p. 004
  - ▶ Exhibit A — the three-message thread. p. 005
  - ▶ Exhibit B — the conflict-of-interest code; page 1 at p. 012, Appendix A from p. 013, certification at p. 021. p. 012
  - ▶ Exhibits C and D — the two determination notices of 4 September. p. 023
  - ▶ Exhibits E and F — the FPPC enforcement production establishing that CDFA, not DCC and not the Commission, administered CalCannabis Form 700 filings. p. 034
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## **2026.09.06 — DCC Email Thread re the Index of PRA Requests (narrowing)**

The August 25 request asked for the index of Public Records Act requests submitted by Paige St. John or the *Los Angeles Times* “that concern any of” seven listed subjects. That phrasing asks the Department to read each request and judge whether it qualifies. This withdraws the limitation and asks instead for the index of all such requests since January 1, 2021, with whatever subject and disposition fields the system carries.

A narrowing, not an expansion: a query by requester name rather than a subject-matter assessment.

Off-ramps — jump straight to the record:

- ▶ The original request and its seven subjects. p. 1
- ▶ The Department’s 4 September determination notice. p. 2
- ▶ The narrowing, 6 September — and the request that it not restart the determination period. p. 3