

California - City & County Regulation Watch A Private group: 8.8K members



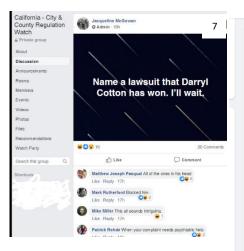












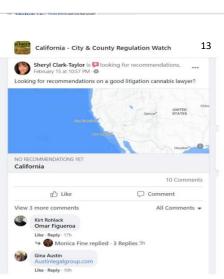






Mr. Ilya Ross, as a licensed CA lawyer and an Officer of the Court, you are welcome to stay in our Banned Members FB group but if you would please tell your paralegal, Patrick Rohde to quit insulting me on forums with information and opinions that were developed from case related information I had shared with you both during numerous text and phone calls, I would respectfully ask that you do so. As you know from those communications, both mine and the Flores cases are being actively litigated in federal court. As such I would ask that any existing libelous public forum comments that Patrick has made be immediately removed and no future public comments by you or Patrick regarding me or either of these cases be made in a public forum again.

Please respond to me, in writing here that you have done so and that he has agreed to remove any existing posts and cease any future activities that may prove prejudicial to our cases on your behalf. I believe your public response to this matter will go along way in dispelling any uncertainty that exists as to what your motives are for engaging in these forums and how seriously you take protecting either potential or current clients privileged information which they share with you. Thank you for your understanding and cooperation in this matter.







SECTION 11. CONSTRUCTION AND INTEPRETATION.

The provisions of this Act shall be liberally construed to effectuate the purposes and intent of the Control, Regulate and Tax the Adult Use of Marijuana Act; provided, however, no provision or provisions of this Act shall be interpreted or construed in a manner to create a positive conflict with federal law, including the federal Controlled Substances Act, such that the provision or provisions of this Act and federal law cannot consistently stand together.



California City and Regulations Watch (CCRW) is a Facebook Group (1) that is administered by Jacqueline McGowan. With approximately 8,800 members, many of which are in the cannabis consulting and legal fields. CCRW is the preeminent social media group that discusses issues surrounding cannabis law and regulation in California. McGowan, a self-proclaimed expert consultant in cannabis regulatory processes, lists attorney Gina Austin (5) as a professional connection. Austin (6) and attorney Jessica McElfresh (4) are defendants in Cotton lawsuits and are both members in the CCRW group.

McGowan banned Cotton from CCRW in April 2019 for his persistent questioning as to how attorneys could make this statement (11) prior to the 2016 vote, knowing that it was false. Cotton also would regularly ask how the "positive conflict" in Section 11 of the Adult Use of Marijuana Act (AUMA) CA Prop 64 (14) could stand? No attorneys ever responded to either question. McGowan responded by banning Cotton from the CCRW group. Cotton immediately started the Banned Members FB Group in response to McGowan's actions.

In August 2020 Patrick Rohde, a member of CCRW group since June 2020 (3) who is a paralegal for Ilya Ross, a CA attorney reached out to Cotton through the Banned Members FB group Cotton had started to discuss the possibility of his attorney, Ilya Ross, also a member of CCRW (2) about doing legal work for Cotton on his cases. These were confidential discussions, protected by attorney-client privilege which Cotton agreed to and has all the email records of the conversations and emails that would divulge Cotton's legal strategies going forward. Upon consideration of Ross's requirements to take the case, Cotton decided that was not equipped to help Cotton. Ross did not have the experience or the staff to handle Cotton's legal matters and his request for a \$25K retainer was entirely unreasonable considering that Ross admitted that much of that retainer would go to him getting "up to speed" on the legal matters that surrounded Cotton's case.

What followed shortly thereafter was the McGowan August 15, 2020 (7) post whereby Rohdes took those discussions into the CCRW group by publicly stating, that Cotton needed "psychiatric help". Cotton requested that Ross tell Rohdes to quit (8) insulting Cotton by making those privileged communications public but neither Ross or Rohdes ever responded to those requests. A search of the CCRW FB group shows that the thread has been taken down. It was only used to alienate Cotton from getting any legal assistance from those attorneys who had an interest in practicing cannabis law in California.

Both the (7) and (10) images were posts by McGowan but the (10) image shows where another CCRW plant, Diana Carrillo-Diva (9) came into to Banned Group to bridge the dialogue being generated by McGowan. Of note, when looking at the bottom of this image you can see that CCRW never shows Carrillo-Diva as not having ever contributed to the CCRW group. This directly contradicts the information that can be seen in (10) where Carrillo-Diva has posted in CCRW to report to that group my responses. Also what can be seen by the "likes" in the (10) image are that some of these were from attorneys such as noted cannabis attorney Omar Figueroa who piles on this Cotton assault. McGowan, acting as the industry kingmaker will reward those attorneys that support her by providing advertising such as the (15) post for one of Figueroa's attorneys or to give Austin a place to advertise her services in CCRW or the posts Austin would put up as seen in (12 & 13).

I hereby attest to the following statements being a true and accurate representation of the conditions surrounding these events as I recall them, and as the evidence would support.

Darryl Cotton