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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**  
10

11 LEON STEELE, individually and as the  
Successor-in-Interest to the ESTATE OF  
12 LE'SHARIA BRE'AUN STEELE; and  
BRENDA BYRD, an individual,

13 Plaintiffs,

14 v.

15 PASSION CARE, LLC; DESERT ZEN,  
16 INC.; VERTICAL BLISS, INC.;  
KUSHYPUNCH, INC.; MORE AGENCY,  
17 INC.; UL HOLDINGS, INC. dba URBN  
LEAF; and DOES 1 through 100,

18 Defendants.  
19

CASE NO. 37-2020-00038013-CU-PO-CTL

**Complaint for Wrongful Death and  
Survivor and Demand for Jury Trial**

1. **Negligence**
2. **Negligent Product Liability**
3. **Strict Product Liability - Design  
and Manufacturing Defect**
4. **Strict Product Liability - Failure to  
Warn of Defective Condition**
5. **Negligent Misrepresentation**

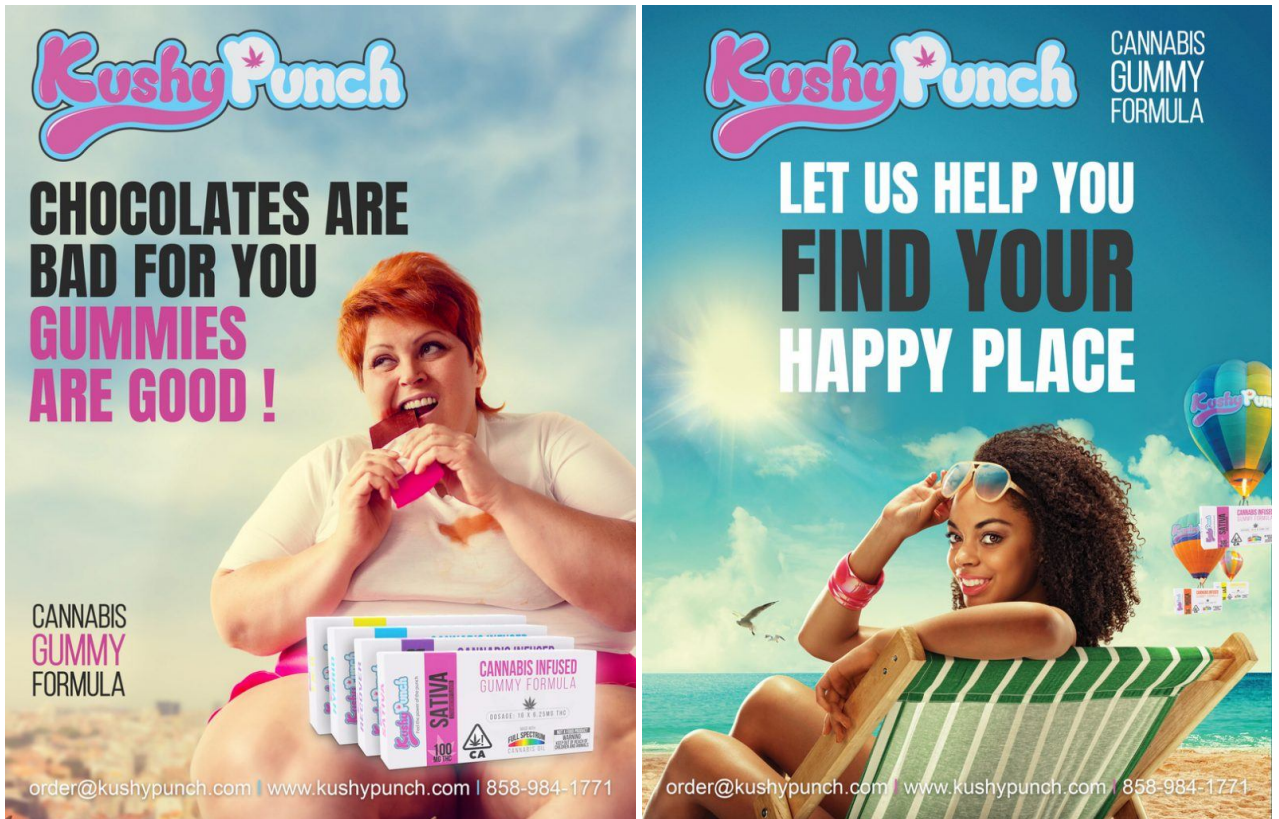
20 COME NOW the Plaintiffs, LEON STEELE, individually and as the Successor-in-  
21 Interest to the ESTATE OF LE'SHARIA BRE'AUN STEELE, and BRENDA BYRD, an  
22 individual, and for causes of action against the Defendants, and each of them, complain  
23 and allege as follows:

24 **INTRODUCTION**

25 1. Decedent Le'Sharia Bre'Aun Steele (hereinafter "Bre'Aun Steele") was a  
26 beloved, 28-year-old woman who served in the church choir and assisted with the  
27 Children's Church Ministry. She loved people and traveling, which led her to obtain a  
28 Bachelor of Arts in Communications and to become a hard-working flight attendant. She

1 was a health-conscious woman who rarely drank alcohol and had only tried marijuana a  
2 small number of times.

3 2. Bre'Aun Steele's health consciousness led her to deciding to try Defendants'  
4 edible marijuana, "KushyPunch Hybrid, Tropical Punch" gummies ("KushyPunch Hybrid  
5 gummies") which were disguised as safe, fun, kid-friendly-looking candy and advertised  
6 as "low calorie, low sugar, zero nuts, zero dairy, zero gluten, zero fat." Defendants'  
7 advertised the KushyPunch Hybrid gummies as a healthy alternative to chocolate with an  
8 overall contribution to wellness with misleading slogans like "let us help you find your  
9 happy place." Defendants claimed the gummies "deliver[ed] the wellbeing and relief to all  
10 those that seek it."



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24 3. Contrary to Defendants misrepresentations, on October 27<sup>th</sup>, 2018,  
25 Defendants' KushyPunch Hybrid gummies took Bre'Aun Steele's life after she ingested  
26 them and experienced acute severe symptoms that lasted for hours, including  
27 cardiovascular, respiratory, psychiatric, and dysphoric symptoms that manifested as  
28 uncontrollable movements, terrifying heart racing, trouble breathing, and mental and

1 physical uncharacteristic outbursts and severe panic attacks.

2 4. Defendants are California marijuana industry companies that jumped at the  
3 opportunity to profit on the legalization of recreational marijuana in January 2018 without  
4 any regard to safety. Each was involved in the chain of distribution for the subject  
5 KushyPunch Hybrid product and/or the design, recipe, manufacture, distribution,  
6 packaging, false advertising, and/or selling of the subject "KushyPunch Hybrid" gummies.

7 5. Once given the green light in late 2017, Defendants designed, created,  
8 produced, distributed and sold edible marijuana products, including KushyPunch Hybrid  
9 gummies, that contain numerous unnatural and untested additives and that have untested  
10 acute and long-term health effects. Defendants also used untested production methods  
11 with known increased risks; untested extraction methods such as obtaining potent known  
12 and unknown cannabinoids in what they call a "full spectrum oil." To add insult to injury,  
13 Defendants provided uninformative labels; colorful kid-friendly and accessible packaging;  
14 inaccurate concentration and dosing information; candy fruity flavors constituting an  
15 attractive nuisance; no information or regard to individual consumer variability; inaccurate  
16 information on the delay of onset and duration of effects; misleading, false and baseless  
17 advertising; no or inadequate warnings about known adverse health effects and risks of  
18 serious injury and death; and misrepresentations about the alleged safety and health-  
19 promoting properties.

20 6. For years before this incident, Defendants knew or should have known that  
21 ingestion of marijuana, tetrahydrocannabinol ("THC"), cannabidiol ("CBD") and other  
22 cannabinoids, was linked to adverse side-effects and that eating marijuana products was  
23 linked to different and worse adverse effects than smoking, including cannabis-associated  
24 ischemic stroke, hemorrhagic stroke, sudden cardiac death, vascular events, arrhythmias,  
25 pulmonary edema, arterial vasospasms, interference with the peripheral vascular reflex,  
26 stress cardiomyopathy, increased sympathetic activity, peripheral vasodilation, increased  
27 myocardial oxygen demand with decreased oxygen delivery, and acute cardiovascular and  
28 other death in young adults where very recent cannabis ingestion was documented and

1 cannabis drug alone was found in blood samples. Defendants also knew edible marijuana  
2 consumption was linked to multiple and increased hospitalizations.

3 7. At all times relevant, Defendants had access to research, studies, testing, and  
4 experts in the field of marijuana and edible marijuana, THC, CBD, and other cannabinoids  
5 or toxic products, and their health effects and risks, as well as the ability to research,  
6 conduct studies and tests, and to consult with experts in the field. However, rather than  
7 heed warnings and available information to keep its consumers safe, Defendants took  
8 advantage of and capitalized on the scarce FDA regulations and chose to cut corners on  
9 safety, not follow the rules, and knowingly put profits before people to sell its dangerous  
10 edible products, all while deceptively claiming the products were safe and safer than  
11 smoking.

12 8. Ignoring known increased risks associated with their KushyPunch Hybrid  
13 gummies, Defendants have consistently bragged about KushyPunch gummies, including  
14 KushyPunch Hybrid gummies, as being edibles that are potent, strong, heavyweight, and  
15 “punch[es] you in the face.” Defendants represent to the public that their gummies, with  
16 apparently the same dosage as others, “hit heavier.” However, Defendants disregard and



1 misrepresent the increased risks of injury and death attributed to ingesting a highly potent  
2 or “heavier hitting” edible known for powerful and dramatic bodily effects.

3 9. Defendants have a history of unlawful and careless behavior. Seller and  
4 dispensary Defendant UL HOLDINGS, INC dba URBN LEAF (“URBN LEAF”), founded in  
5 2017 by Will Senn, sold the subject KushyPunch Hybrid gummies and the subject package  
6 itself in 2018. However, its founder, Will Senn, was enjoined from operating and  
7 maintaining a marijuana dispensary in the City of San Diego back in December 2012. It  
8 was not until May 3, 2019 that the injunction was modified to permit Senn to operate under  
9 the proper permits.

10 10. Defendant URBN LEAF came under further criticism from the community  
11 when in early 2018, not only was it selling candy-like edible marijuana, but it encouraged  
12 and advertised a young girl scout selling Girl Scout Cookies outside its shop doors.

13 11. Showing past and continued disregard for the law and safety of others, after  
14 this incident in November 2019, URBN LEAF’s San Ysidro branch’s license was suspended  
15 for its failure to enroll in a state-required system meant to keep tabs on the state’s cannabis  
16 inventory. This system’s purpose was to ensure businesses’ products were safe and would  
17 not end up on the black market.

18 12. Defendant URBN LEAF was not the only Defendant to lose a license or  
19 engage in unlawful and careless behavior. At around the same time, in 2019, news sources  
20 alleged Defendant VERTICAL BLISS, INC. dba KUSHYPUNCH (“VERTICAL BLISS”) had  
21 been operating out of two facilities in Los Angeles, California for years. One facility  
22 apparently housed state-compliant processing, using cannabis that Defendant alleged  
23 passed testing requirements; the other facility allegedly was processing untested cannabis  
24 that may not have passed state requirements including pesticide standards and were  
25 claimed to have been using cannabis oil with heavy levels of pesticides.

26 13. On November 21<sup>st</sup>, 2019, investigation into allegations of Defendants’ illegal  
27 conduct led to the Bureau of Cannabis Control (“Bureau”) and California Department of  
28 Public Health (“CDPH”) revoking Defendant VERTICAL BLISS’s cannabis manufacturing



1 and distribution licenses after a raid of the unlicensed location and seizing of nearly \$21  
2 Million in illegal KushyPunch cannabis products, which included edible gummies.

3 14. Despite revoking VERTICAL BLISS' licenses shortly after this incident,  
4 Defendants got KushyPunch gummies back on store shelves within a little over a few  
5 months, in early 2020—an announcement that came when Happy Brain, Inc. announced it  
6 licensed the intellectual property rights to the KushyPunch brand to manufacture and sell  
7 the products through its subsidiary, Varavo, throughout California. No change in  
8 production methods, recipes, instructions, or warnings were announced. We have yet to  
9 hear them disclose the adverse health effects caused by their edible products.

10 15. Like chewing tobacco products were popular decades ago, edible marijuana  
11 is now flying off store shelves under the public impression, created by Defendants' and  
12 others' relentless marketing, that it is "safe" or safer than smoking. It is the responsibility  
13 of the Defendants to stop the misinformation, to halt and change their ways and the  
14 careless manner and doses in which their products are created and sold, and to provide  
15 accurate information and warnings of the very serious known adverse health effects and  
16 risks. It is the responsibility of the Defendants to use reasonable care and common sense to  
17 stop injuring and killing consumers.

18 16. This case is not an argument against legalizing marijuana as legalization  
19 provides routes to demand safe practices and regulations that are not available under  
20 prohibition. The courts must serve as an avenue of regulation in which injured consumers  
21 can demand accountability as well as safe and responsible business practices from these  
22 marijuana industry giants and highlight the needs for immediate remedial actions and  
23 further formal regulations. This case is a demand for justice for Decedent Bre'Aun Steele  
24 and for Plaintiffs LEON STEELE and BRENDA BYRD for the wrongful death of their  
25 daughter caused by Defendants' product.

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**JURISDICTION, VENUE AND PARTIES**

17. This action seeks damages for Plaintiffs LEON STEELE and BRENDA BYRD for the wrongful death of their daughter, Le’Sharia Bre’Aun Steele.

18. Plaintiff LEON STEELE, individually and as the Successor-in-Interest to the ESTATE OF LE’SHARIA BRE’AUN STEELE, is the surviving natural birth father and parent of Decedent Le’Sharia Bre’Aun Steele.

19. Plaintiff BRENDA BYRD is the surviving natural birth mother and parent of Decedent Le’Sharia Bre’Aun Steele.

20. Decedent Le’Sharia Bre’Aun Steele did not have a surviving spouse or any surviving children. Plaintiff LEON STEELE brings this suit individually and as successor-in-interest to Le’Sharia Bre’Aun Steele, on behalf of all surviving next of kin.

21. Plaintiffs assert wrongful death claims under California Code of Civil Procedure §377.60 et seq., or any other applicable laws, and claim all allowable wrongful death damages.

22. Plaintiffs also assert survival claims pursuant to California Code of Civil Procedure sections 377.10, 377.20, and 377.30 et seq., or any other applicable laws, and claims all allowable survival damages.

23. Plaintiff LEON STEELE is the successor-in-interest to the Decedent under California Code of Civil Procedure section 377.30 and brings this action as specified therein. The successor-in-interest statement required by Code of Civil Procedure section 377.32(a) is attached to this Complaint as “Exhibit A.” A true and correct copy of Le’Sharia Bre’Aun Steele’s death certificate is attached to this Complaint as “Exhibit B.”

24. On October 27<sup>th</sup>, 2018, after the causes of action herein arose in her favor, Le’Sharia Bre’Aun Steele died. Le’Sharia Bre’Aun Steele would have been the plaintiff in this action had she lived.

25. Relevant events giving rise to Plaintiffs’ claims and the conduct of the defendants occurred in San Diego County. Venue is therefore proper under California Code of Civil Procedure section 395.

1           26.     All of the facts and circumstances complained of herein occurred within the  
2 State of California or under circumstances such that this Superior Court has jurisdiction.

3           27.     At all times relevant, Plaintiff LEON STEELE, was and is a resident of Athens,  
4 Alabama.

5           28.     At all times relevant, Plaintiff BRENDA BYRD, was and is a resident of  
6 Athens, Alabama.

7           29.     At all times relevant, Defendant KUSHYPUNCH, INC., a California  
8 corporation, was and is a corporation headquartered in North Hollywood, California, and  
9 doing business in the State of California.

10          30.     At all times relevant, Defendant PASSION CARE, LLC., a limited liability  
11 company, was and is a company headquartered in Adelanto, California, and doing  
12 business in the State of California.

13          31.     At all times relevant, Defendant DESERT ZEN, INC., a California  
14 corporation, was and is a corporation headquartered in Cathedral City, California, and  
15 doing business in the State of California.

16          32.     At all times relevant, Defendant VERTICAL BLISS INC., a California  
17 corporation, was a company headquartered in Marina Del Rey, California and is now a  
18 corporation headquartered in Chatsworth, California, and was and is doing business in the  
19 State of California.

20          33.     At all times relevant, Defendant MORE AGENCY, INC., a California  
21 corporation, was and is a corporation headquartered in Valley Glen, California, and doing  
22 business in the State of California.

23          34.     At all times relevant, Defendant UL HOLDINGS, INC. dba URBN LEAF, a  
24 California corporation, was and is a corporation headquartered in San Diego, California,  
25 and doing business in the State of California.

26          35.     The true names and capacities, whether individual, corporate, associate or  
27 otherwise of Defendants DOES 1 through 100, inclusive, are unknown to Plaintiffs, who  
28 therefore sue said defendants by such fictitious names under Code of Civil Procedure



1 Section 474. Plaintiffs are informed and believe and thereon allege that each of the  
2 defendants herein designated as a DOE is negligently responsible in some manner for the  
3 events and happenings alleged herein and legally caused the injuries and damages alleged  
4 below.

5 36. At all times relevant, Defendants, PASSION CARE, LLC, DESERT ZEN, INC.,  
6 UL HOLDINGS, INC. dba URBN LEAF, VERTICAL BLISS, INC., MORE AGENCY INC.,  
7 KUSHY PUNCH, INC., and DOES 1 through 100, inclusive and each of them, designed,  
8 created, manufactured, tested, inspected, sold, promoted, advertised, distributed, and  
9 otherwise introduced into the stream of commerce whether online, through third parties,  
10 or in person, the subject KushyPunch Hybrid Product and Products.

11 37. At all times herein mentioned, each defendant was acting in the course and  
12 scope of his employment with the other defendants. Defendants are therefore vicariously  
13 liable for the acts of each of the remaining defendants herein.

14 38. In addition, each defendant was at all times acting as the ostensible agent of  
15 the remaining defendants and was doing so at the behest of and with the approval of those  
16 defendants. At all times herein relevant, Plaintiffs reasonably and without negligence relied  
17 on the representations made by the defendants about the agency and employment of each  
18 of the remaining defendants.

19 **GENERAL ALLEGATIONS APPLICABLE TO ALL DEFENDANTS**

20 39. Since legalization, the use of edible cannabis products has dramatically  
21 increased and the safety of those products, including those containing hundreds of potent  
22 cannabinoids, and warnings about the dangers of consumption, is an urgent responsibility  
23 of the cannabis industry Defendants.

24 40. As used throughout this Complaint, "the Product" shall refer to the  
25 KushyPunch Hybrid Tropical Punch gummy edible marijuana product that was purchased  
26 from Urbn Leaf located at 1028 Buenos Avenue, San Diego, California 92110, and that  
27 Decedent, Bre'Aun Steele consumed within hours of her death, which Plaintiffs allege  
28 wrongfully caused Bre'Aun Steele's untimely death and Plaintiffs' injuries and damages

1 alleged below.

2 41. As used throughout, "Products" shall refer to the marijuana edibles that were  
3 the same or similar make, model, batch, recipe and design as the subject KushyPunch  
4 Hybrid Tropical Punch Product that Decedent, Bre'Aun Steele lawfully consumed within  
5 hours of her death, which Plaintiffs allege wrongfully caused Bre'Aun Steele's untimely  
6 death and Plaintiffs' injuries and damages alleged below.

7 **A. Defendants Knew or Should Have Known that Eating Cannabis, THC, and Other**  
8 **Cannabinoid-Containing Products like the Subject Products Can Cause Serious**  
9 **and Life-Threatening Side Effects and Death**

10 42. There is a long history of public misinformation about marijuana that leads  
11 the overall public to believe it is "safe" and to be skeptical of data that shows otherwise.  
12 Indeed, data and research has shown consuming cannabis, especially edible cannabis, can  
13 have devastating consequences.

14 43. Since the 1970's case reports of both coronary and cerebral ischemia related to  
15 cannabis intake have been published. One case report published in 1979 described a fit 25-  
16 year-old man that presented with a "sudden onset of pulmonary edema" thirty (30)  
17 minutes after marijuana use.

18 44. Wayne Hall and Nadia Solowij published a seminar, "Adverse effects of  
19 cannabis" in *The Lancet* in 1998. The seminar explains that cannabis ingestion or smoking  
20 increases heart rate by 20-50% within three (3) to fifteen (15) minutes and can last up to  
21 three (3) or more hours. Ingestion increases blood pressure. Common side-effects noted  
22 were anxiety and panic reactions, but impaired psychomotor performance and increased  
23 risk of psychotic symptoms were also noted. THC also produced confusion, delusions,  
24 hallucinations, anxiety, and agitation. It has been shown to increase and exacerbate  
25 symptoms of schizophrenia.

26 45. A case report, "Acute cardiovascular fatalities following cannabis use," by  
27 Liliana Bachs of National Institute of Forensic Toxicology, which was published in October  
28 2001 in *Elsevier Science International*, reports thirty-five cases involving deaths with cannabis  
as the major toxicological finding. Of those deaths, six were sudden deaths of young adults

1 whom recently ingested cannabis and died of some sort of acute cardiovascular symptoms.  
2 The Report makes clear that “[c]ardiovascular effects are the most consistent physiological  
3 findings after acute cannabis administration” and that “significant tachycardia,  
4 conjunctival injection and increased limb blood flow” have been reported.

5 46. A 2003 research and review article on the pharmacokinetics and  
6 pharmacodynamics of cannabinoids indicates greater bodily central effects from THC with  
7 oral ingestion versus smoking. It explains that that metabolite “11-OH-THC” significantly  
8 contributes to the overall central effects of THC, especially with oral use, which shows  
9 much higher concentrations of the 11-OH-THC than inhalation.

10 47. Studies have also consistently shown and concluded that people who use  
11 cannabis have an increased risk of psychosis, including schizophrenia-like psychosis.  
12 Marijuana edible users often experience higher or increased significant psychosis  
13 symptoms as documented by emergency physicians with incidents increasing since  
14 legalization.

15 48. The National Poison Data System reported four-hundred thirty (430)  
16 cannabis-related calls from 2013 to 2015. Significantly, some cases were so severe that  
17 intubation was necessary. These statistics show edible cannabis consumption can lead to  
18 respiratory depression. See, CAO D. Srisuma S. Bronstein AC, et al., “Characterization of  
19 edible marijuana product exposures reported to United States poison centers.” *Clin Toxicol*  
20 *(Phila)*. 2016; 54(9):840-846.

21 49. In 2014, the *Journal of the American Heart Association* published “Cannabis Use:  
22 Signal of Increasing Risk of Serious Cardiovascular Disorders” authored by several doctors  
23 indicating that cannabis is likely a triggering factor for cardiovascular complications in  
24 young adults with several extremely serious cases. The same year, an article published in  
25 the *Morbidity and Mortality Weekly Report Journal* describes a 19-year-old man that  
26 consumed edible marijuana and experienced erratic speech and hostile behavior before  
27 uncharacteristically jumping to his death from a fourth-floor balcony.  
28

1           50.     Doctors in the Department of Emergency Medicine at the University of  
2 Colorado, Aurora published an article in *JAMA* in 2015 that explains that cannabis product  
3 designers and manufacturers have been experimenting “with new ways to use and  
4 produce THC products,” which has caused “unexpected health effects” and “health care  
5 visits due to ingestion of the edible products.”

6           51.     In 2015, CBS News Denver reported that marijuana intoxication had been  
7 blamed for multiple deaths since legalization.

8           52.     An update on cannabis and its medical use was presented and published in  
9 2015 at the request of the Secretariat of the Expert Committee on Drug Dependence,  
10 Department of Essential Medicines and Health Products, World Health Organization. The  
11 update provided a review of science and research. It established that cannabis affects  
12 cognition and coordination, and less experienced users undergo stronger intoxicating  
13 effects. Use is also associated with psychosis, vascular conditions that increase risk of  
14 myocardial infarction, stroke, and transient ischemic attacks. From 2004 to 2011, 36% of  
15 illicit drugs noted in emergency rooms in the United States was cannabis. Further, “[i]n a  
16 consortium of 16 sentinel centers across Europe reporting acute drug toxicity presentations  
17 in emergency departments, cannabis ranked third among drugs after heroin and cocaine.”

18           53.     A comprehensive review of medicinal marijuana, cannabinoids and  
19 implications in medicine was authored by Eric P. Baron, D.O. in 2015. Reported adverse  
20 effects were noted to include dysphoria, depersonalization, anxiety/panic attacks,  
21 aggravation of psychosis, synesthesia, distortion of sense of time and space, heightened  
22 sensory perception, misperceptions, hallucinations, ataxia, weakness, disequilibrium,  
23 incoordination, dysarthria, mental clouding, thought fragmentation, acute stroke, increased  
24 blood flow and pressure, multifocal intracranial stenosis, headache, conjunctival injection,  
25 vasodilation, postural hypotension, supine hypertension, arteritis, acute tachycardia,  
26 ventricular arrhythmia, atrial fibrillation, premature ventricular contractions, increased  
27 acute risk of acute myocardial infarction, increased myocardial oxygen demand,  
28 carcinogenesis, respiratory inflammation, decreased secretions, motility and

1 gastric/colonic emptying, pancreatitis, and possible increased risk of hepatic  
2 fibrosis/steatosis, among others. Studies using internet search engine queries have  
3 concluded similar adverse reactions.

4 54. In July 2017, a case report was published establishing a basal ganglia  
5 hemorrhage after oral ingestion of cannabis without other identified risk factors.<sup>1</sup> In the  
6 Case Study, doctors specifically state that large volumes of marijuana ingested can cause a  
7 significant serum level of THC and should be avoided.

8 55. Another 2017 case report concludes that an eleven (11) month old baby boy  
9 likely died from cannabis exposure. He presented with central nervous system depression  
10 after seizure and progressed to cardiac arrest and died following the exposure. The  
11 publication was at all times readily available to Defendants, published in UC Irvine's  
12 *Clinical Practice and Cases in Emergency Medicine Journal*. Authors powerfully concluded,  
13 "[g]iven the existing relationship between cannabis and cardiovascular (CV) toxicity, as  
14 well as the temporal progression of events, post-mortem analysis, and previously reported  
15 cases of cannabis-induced myocarditis, the authors propose a relationship between  
16 cannabis exposure in this patient and myocarditis, leading to cardiac arrest and ultimately  
17 death." They also make clear that it is "well known" that cardiovascular effects of  
18 "cannabis exposure include tachycardia and decreased vascular resistance," which are  
19 believed to be a result of "cannabinoid effect on the autonomic nervous system, peripheral  
20 vasculature, cardiac microvasculature, and myocardial tissue and Purkinje fibers."

21 56. Since legalization, cases of bodily shakes or tremors have been increasingly  
22 reported after ingestion of edible marijuana. Stress, anxiety, and consuming caffeine while  
23 or close in time to ingesting edible marijuana has been reported to trigger the  
24 uncontrollable seizure-like tremors. People often report that they feel like they are going to  
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26  
27 <sup>1</sup> Atchaneeyasakul, M.D. et al., "Large Amount of Cannabis Ingestion Resulting in Spontaneous Intracerebral  
28 Hemorrhage: A Case Report," *Journal of Stroke and Cerebrovascular Diseases*, Vol. 26, No. 7 (July), 2017: pp e138-  
e139; See also McGilveray IJ. "Pharmacokinetics of cannabinoids," *Pain Res Manag* 2005; (10 Suppl A):15A-  
22A.

1 die when they experience edible marijuana symptoms including tremors and/or shakes.

2 57. Emergency room visits related to edible cannabis ingestion versus smoking  
3 cannabis have been reported more likely to be related to psychiatric, psychosis, anxiety,  
4 cardiovascular symptoms, and intoxication. The statistics are confirmed in a 2019 study of  
5 9973 emergency department visits related to cannabis use. Researchers noted the  
6 “observed proportion of cannabis-attributable visits with edible exposure was about 33  
7 times higher than expected (10.7% vs 0.32%) if both routes of exposure were equally toxic.”  
8 This shows orally ingesting marijuana is more toxic.

9 58. Emergency room doctors are regularly seeing edible marijuana-related cases  
10 at increasing rates. Emergency room doctor at UCLA Medical Center in Santa Monica,  
11 California, Lisa Dabby, M.D. reported “I probably see someone once every one or two  
12 weeks, someone with a complication after ingesting [an edible].”

13 59. Young, healthy individuals with no apparent risk factors are becoming  
14 vulnerable to stroke, aneurism and cardiovascular events due to use of products with THC.  
15 As explained in prior research and even as recently as 2019 in an article published in *MOJ*  
16 *Toxicol*, THC has been shown to inhibit brain mitochondrial respiration, raising the risks of  
17 the above.

18 60. While medical cannabis tends to have lower doses of THC and higher doses  
19 of CBD, recreational edible marijuana companies, including Defendants, tend to strive for  
20 the opposite, increasing risks to consumers. Even the THC content in cannabis plants have  
21 increased from 4% to 16% over the last several decades due to intentional acts of the  
22 marijuana industry and selective reproduction. Because edible cannabis products have  
23 unique pharmacodynamics versus smoking, overdoses are possible.

24 61. KushyPunch CEO Ruben Cross recently made the following statement  
25 regarding the marijuana industries huge impact on human health: “I think we are blessed  
26 to be in this industry. I can’t imagine doing anything else at this time that would make such  
27 a huge impact on human health.” Defendants should take responsibility for the huge  
28 negative impact its Product has had on human health.



1 **B. Defendants Rely on Consumers Expectation of Safety to Sell Their Products**

2 62. Defendants have known that the public incorrectly perceives their edible  
3 marijuana products, including the Products, as safe and as a healthier alternative to  
4 smoking. Instead of informing and warning the public of the above known health risks  
5 and effects or that their manipulation of edible marijuana and their design of their Products  
6 made it much more dangerous, Defendants capitalize on the public's false sense of security  
7 and safety in their design, manufacture, advertising, packaging, labeling, and selling of the  
8 subject Products.

9 63. Like the early decades of tobacco sales and use, consumers, especially young  
10 and/or naïve consumers, view consuming the Products and experiencing the "high" as  
11 cool, hip, and mainstream so as to be safe since "everyone is doing it."

12 64. According to a focus group study published in in 2016 by doctors and  
13 professors, edible marijuana use was then becoming nearly as common as smoking  
14 marijuana where medical marijuana was available. Edibles are attractive to people who do  
15 not like to smoke or have concerns about smoking. It has been shown that females are  
16 more likely to prefer edible use over smoking and users prefer the edible because they  
17 appear in a better light than smokers and do not want to smell like smoke or be known  
18 doing unhealthy things. The study concludes it is necessary to restrict edibles with strong  
19 appeal and educate users about the risks.

20 65. According to Paul Armentano, deputy director of the National Organization  
21 for the Reform of Marijuana Laws, the general public is unaware that the way the body  
22 responds to cannabis when it is inhaled is entirely different than the way the body  
23 responds when it is consumed orally. Paul Armentano explains it is not just a labeling  
24 issue but also an education issue.

25 66. Studies show that the prevalence of edible use is high among marijuana  
26 users. One factor leading to the misconception of safety is that some edibles are designed  
27 and packaged to mimic candies and sweets, which are otherwise safe and enticing treats  
28 when not combined with cannabinoids and other toxins. This also increases the appeal to

1 children and young people in general.

2 67. Studies have found that the public has perceived edible cannabis use as less  
3 risky for years and are generally not concerned about injury or death—a concept discussed  
4 in a research article published in the *Environ. Health Review* in 2019. A common  
5 misconception is that edibles, including the Products, are “cannabis-containing food  
6 products,” when actually, the extracts used to produce edibles are often different than the  
7 plants used for smoking, and the extracts create different effects and health issues. Studies  
8 found that adults used edibles as an alternative to smoking marijuana to mitigate health  
9 risks and a quantitative study of Twitter tweets showed edibles were portrayed as a  
10 healthy alternative.

11 68. Andrew A. Monte, M.D., Ph.D. of the University of Colorado School of  
12 Medicine, Aurora, and colleagues researched edible marijuana issues and noted that “[a]t  
13 the very least, users must be educated about the delayed kinetic profile and the increased  
14 risk for acute psychiatric and adverse cardiovascular events associated with edible  
15 ingestion.”

16 **C. Defendants Contributed to Bre’Aun Steele’s Misconceptions and False**  
17 **Beliefs About Its Products’ Safety by Engaging in Targeted False**  
**Advertising and Misrepresentations About KushyPunch Products**

18 69. Defendants created several enticing and misleading ads for KushyPunch  
19 specifically directed at women. In one, they state “Let Us Help You Find Your Happy  
20 Place” while showing a young woman walking out into a clear blue ocean on a sunny day  
21 and another with a woman happy in a beach chair. Several ads contain young women of  
22 all ethnicities sensually biting an entire 100mg box-worth sheet of gummies—what should  
23 be several separate doses. Others place the colorfully packaged KushyPunch gummies  
24 next to glitter sticks and pink Starbucks coffee. A major, heavily used advertisement shows  
25 a wild-haired high-fashion woman model holding the gummies with statements such as  
26 “powered by cannabis.” In another, an angelic young woman is floating in the clouds  
27 above the gummies with the phrase “you are now free to be happy.” Still more are  
28 directed toward working and professional women, showing a younger to middle age

1 woman in a blouse juggling the gummies, with the words “let us help you juggle life.”  
2 Several others feature young women with slogans like “need a better mood?,” “catch the  
3 happy wave,” “might make you want to do some yoga,” “mother nature’s remedy,” “here  
4 to help you relax through the summer,” “healthy days California,” “you are now free to be  
5 happy California,” “happiness is only a gummy away,” “flexible mind, flexible body,”  
6 “clear your chakras,” “chocolates are bad for you, gummies are good,” “eat the pain  
7 away,” “California’s happy days are here,” “angry to blissful in under 60 minutes,” and  
8 “add color to your life.” Defendants advertise a safe, happy, healthy experience—the  
9 opposite of what they are actually selling.

10 70. Defendants, through their advertisements, deliberately targeted certain  
11 individuals, including working young adult women who are health conscious like  
12 Decedent Bre’Aun Steele.



1           71.     On one hand, Defendants admit that the Products are “seriously potent;” on  
2 the other, they shamelessly claim they are *healthy*, without any basis for such claim.  
3 Defendants claim to have a “science forward approach” and yet they ignore the science  
4 that makes clear their Products are dangerous and deadly.

5           72.     KushyPunch Founder and CEO Ruben Cross claims the idea for the Products  
6 came about when they “started thinking about the healthiest ways that [they] could get  
7 people their favorite products.” He says they “needed something small, easy to consume  
8 with low calories and low sugar.” Defendants also claimed that “driving the pursuit for  
9 wellness with FDA-standards of development and compliance, [their] gummy delivered  
10 the much-needed consistency that was famously lacking in the wild west days of pre-  
11 recreational cannabis in our home state of California.” However, the FDA does not regulate  
12 marijuana products but if they did, the Products, including the subject Product, would  
13 actually likely violate FDA standards for food related to testing, production, food  
14 additives, and packing.

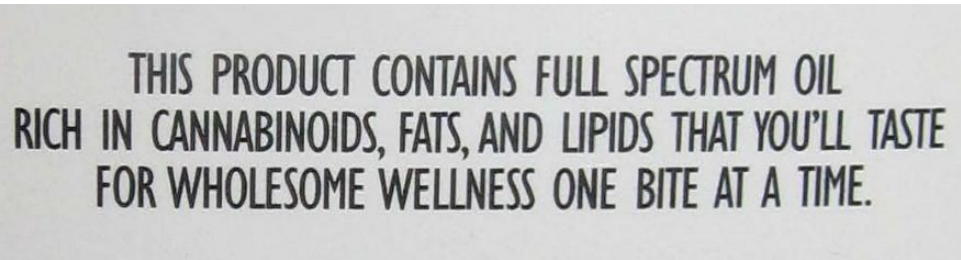
15           73.     In direct contradiction to the research, studies, statistics and science—some of  
16 which is described above—Defendants claim “[w]ith each passing year we see yet more  
17 evidence emerge enforcing cannabis’ position at the forefront of a disruption to the  
18 pharmaceutical industry, and we will continue to increase our standards, spearhead  
19 innovation, and *deliver wellbeing and relief to all those that seek it.*” (emphasis added.)

20           74.     Defendants misrepresented the Product’s and Products’ health and wellness  
21 qualities and bodily effects as follows:

22                   Sit back, kick your feet up and let the deep relaxation settle in.  
23                   You’ll feel the pain radiate away as positive vibes rush in. The  
24                   tropical aromatic terpenes and essential oils, collaborate with  
25                   THC as they massage your neural pathways and induce a  
26                   comfortable mind/body balance. Some of the main effects of  
27                   HYBRID include: Combines the effect of Indica and Sativa  
28                   strains, Body Resting, Deep Relaxation, Uplifting Cerebral  
                    Effect, Fights Depression, Promotes Mind/Body Balance . . .  
                    They’re among the top picks for patients looking for deep, long-  
                    lasting relaxation from physical discomfort—and of course  
                    they’re great for a host of medical conditions from chronic  
                    anxiety to nerve pain.

1           75.     At all times relevant, Defendants made unfounded claims that the extraction  
2 methods they used to obtain what they call the “full spectrum oil” added to the  
3 KushyPunch Hybrid gummies “harnesses the complete holistic capabilities of the cannabis  
4 plant.” They admit that this extraction method means that the oil contains not only THC,  
5 but other cannabinoids “such as” CBD and CBN, terpenes, flavonoids, and lipids—a  
6 combination that has been untested.

7           76.     At all times relevant, Defendants misled consumers, including Bre’Aun  
8 Steele, about the risks and dangerous adverse health effects of the Product from their  
9 website, statements, marketing and media to the subject packaging. On the Product’s  
10 package, Defendants misleadingly printed “[t]his product contains full spectrum oil rich in  
11 cannabinoids, fats, and lipids that you’ll taste for *wholesome wellness* one bite at a time.”  
12 (emphasis added.)



13  
14  
15  
16  
17  
18           77.     Defendants’ Product caused the opposite of wholesome wellness for  
19 Plaintiffs’ daughter, decedent Bre’Aun Steele.

20 **D. Defendants Dangerously Designed and Manufactured the Product with**  
21 **Experimental, Unsafe Techniques and Without Proper Testing**

22           78.     Defendants decided to create the edible Products by using new, experimental,  
23 and untested methods, including extracting all-inclusive oil containing several  
24 cannabinoids, known and unknown. Defendants claim they use “BHO” and ethanol  
25 extractions. BHO stands for “butane hash oil,” and it describes cannabis concentrate that’s  
26 extracted using butane as a solvent. Butane is a highly explosive gas. Around 2013, BHO  
27 extraction methods started to be used by some as it allowed for the creation of highly  
28 potent oil with high concentrations of THC. The oil is also used in vape pens and for

1 “dabbing.” The butane process quickly became viewed as more toxic and product  
2 manufacturers that wanted to separate themselves from it began labelling their products as  
3 “solvent-free” (using heat) or “non BHO” (using alternatives). Healthier and safer options  
4 included using CO2 or H2O as solvents, but these methods were more expensive.

5 79. The BHO extraction process includes ground up marijuana placed inside a  
6 tube or something similar and then adding butane to saturate the marijuana. A greenish-  
7 brown resin will ooze from a filter. Then, a person attempts to “boil off” the butane. A  
8 sticky resin/oil remains. The oil then cools and hardens. Traces of butane were found in the  
9 Products.

10 80. Defendants also claim to use ethanol extraction methods. Ethanol is a clear,  
11 colorless liquid that is the main ingredient in some alcoholic beverages. It is known for  
12 allowing for quick, large extractions saving on power usage. However, experts agree that it  
13 does not create the best end-product and unless using the highest quality equipment, levels  
14 of ethanol leftover in the product can be hazardous. Traces were found in the subject  
15 Products.

16 81. BHO and Ethanol extractions are newer created methods of extracting an oil-  
17 like substance including cannabinoids and terpenes. They have chosen to use dangerous  
18 chemicals over safe liquids. Further, over one hundred and thirteen (113) cannabinoids  
19 exist, many of which have not been identified or studied, and the health risks of ingesting  
20 most are unknown. Defendants created a perfect storm for harm: they made an oil  
21 substance containing known-dangerous compounds and unknown compounds, using  
22 dangerous chemicals, without proper safety testing, and added it to “food,” which is not  
23 regulated by the Federal Food and Drug Administration. Not only that, Defendants knew  
24 and should have known about the serious life-threatening health effects caused by their  
25 Products but chose to manipulate the public and Ms. Steele into believing that their  
26 Product was not only “safe,” but beneficial to one’s health.

27 82. What’s more, Defendants designed and manufactured the KushyPunch  
28 Products, including the subject Product as a sheet of gummies all connected that are



1 stamped into ten squares. Each square should be a ten (10) mg dose. However, a consumer  
2 would have to pull apart each square to separate the sheet into the supposed doses, which  
3 can be confusing and encourage overdose. Not only that, Defendants did not take any  
4 action or precautions to ensure that the THC and other known and unknown cannabinoids  
5 were evenly spread out into each apparent “dose” or square such that Defendants did not  
6 actually know if the 100 milligrams was dangerously concentrated within one area of the  
7 sheet of gummies, or properly spread out as required. This presented the foreseeable risk of  
8 unintentional overdose and increased side effects.

9 83. To make matters worse, Defendants allegedly sent samples from the subject  
10 Product’s same batch to be tested as a whole sheet, not as individual or separate doses. The  
11 entire sheet of gummies advertised as 100 mg of THC with CBD cannabinoid actually did  
12 not detect any CBD cannabinoid. This shows not only were Defendants likely selling a  
13 sheet of gummies with unknown dosages, but the overall content was also inaccurate.  
14 Defendant further negligently and careless chose not to have the moisture, water activity,  
15 terpenes, heavy metals, or mycotoxins tested in the samples allegedly sent from the subject  
16 Product’s batch.

17 84. Not surprisingly, the samples allegedly sent to be tested from the subject  
18 Product’s batch had small amounts of acetonitrile, ethanol, and ethyl-acetate with traces of  
19 butane and other solvents. Acetonitrile is used to make pharmaceuticals, perfumes, rubber  
20 products, pesticides, acrylic nail removers, and batteries. Ethanol was explained above.  
21 Ethyl-acetate is a colorless liquid that has a sweet smell and is used in glues and nail polish.

22 **E. Defendants Failed to Adequately Instruct and Warn Consumers About Life-**  
23 **Threatening Dangers They Knew About for Years**

24 85. Defendants included no appreciable warnings about the serious health risks  
25 of consuming its Products on their websites, social media, or elsewhere. In fact, as alleged  
26 above, Defendants deceptively described their products as *healthy* and claimed edible  
27 cannabis products and the Products “treated” certain ailments.

1           86. Defendants packaged the Products, including the subject Product in plastic  
2 and foil paper surrounded by a cardboard box. Defendants did not include an insert,  
3 pamphlet, or other informative materials with the Product.

4           87. Defendants added no warnings on the Product's packaging related to known  
5 health risks including but not limited to dysphoria, depersonalization, anxiety/panic  
6 attacks, psychosis, hallucinations, ataxia, weakness, disequilibrium, dysarthria, impaired  
7 cognitive performance, acute stroke, increased blood flow and pressure, multifocal  
8 intracranial stenosis, headache, arteritis, acute tachycardia, ventricular arrhythmia, atrial  
9 fibrillation, premature ventricular contractions, increased acute risk of acute myocardial  
10 infarction and other myocardial risks, increased myocardial oxygen demand,  
11 carcinogenesis or respiratory inflammation or suppression.

12           88. Defendants added no warnings on or with the Product's packaging related to  
13 trouble breathing, heart-racing, panic attacks or uncontrollable bodily movements.

14           89. Defendants added no warnings on or with the Product's packaging related to  
15 when to seek medical care or attention, or when to call 9-1-1.

16           90. Defendants added no warnings on or with the Product's packaging related to  
17 serious injury or death.

18           91. Defendants added no warnings on or with the Product's packaging related to  
19 adverse side effects of the Product.

20           92. Defendants added no or insufficient warnings and information on or with the  
21 Product's packaging related to the differences and risks of consuming edible marijuana  
22 versus smoking it.

23           93. Defendants did not add warnings on or with the Product or the Product's  
24 packaging about the serious health risks and consequences of taking more than one dose.

25           94. Defendants did not add warnings on or with the Product or the Product's  
26 packaging related to some "doses" or squares containing more than 10 mg of THC and/or  
27 other cannabinoids.  
28

1           95. Defendants did not add warnings on or with the Product or the Product's  
2 packaging related to the presence of the unknown or additional cannabinoids or the safety  
3 thereof being unknown.

4           96. Defendants did not add warnings or information on or with the Product's  
5 packaging related to the duration of its effects, which have been shown to be substantially  
6 longer than smoking marijuana.

7           97. Defendants did not add warnings or information on whether to take the  
8 Product on an empty stomach or with food, or which types of foods and products it should  
9 not be ingested with at the same or close in time.

10          98. Defendants failed to provide accurate and adequate safety instructions for  
11 use of the Product on its packaging or with it. Defendants inaccurately stated on the front  
12 of the Product's outer packaging that it had a "60 minute" activation. That is contrary to  
13 research, studies and science available to Defendants at the time of design, manufacture  
14 and sale. Indeed, ingesting THC orally has been shown to have delayed effects, and  
15 especially delayed peak effects, up to three hours or more. On the back of the Product's  
16 outer packaging, Defendants printed that "the intoxicating effect of THC may be delayed  
17 up to two hours." That too is an understatement. The science shows and showed that the  
18 THC effects could be delayed up to *three* hours or more.

19 **F. Defendants' KushyPunch Product Took Bre'Aun Steele's Life**

20          99. Lured by Defendants misleading advertisements and failures to provide  
21 adequate warnings or instructions, on or about October 26<sup>th</sup>, 2018, Decedent Bre'Aun Steele  
22 consumed the KushyPunch Hybrid Product designed, created, manufactured, tested,  
23 inspected, distributed, advertised, promoted and sold by Defendants PASSION CARE,  
24 LLC; DESERT ZEN, INC.; VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE  
25 AGENCY, INC.; UL HOLDINGS, INC dba URBN LEAF; and DOES 1 through 100. At no  
26 time before, during, or after was Ms. Steele informed by any of the Defendants that the  
27 Product was defective or dangerous.  
28



1           107. At all times relevant, Defendants PASSION CARE, LLC; DESERT ZEN, INC.;  
2 VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE AGENCY, INC.; UL HOLDINGS,  
3 INC dba URBN LEAF; and DOES 1 through 50, and each of them, owed duties of  
4 reasonable care to Decedent Bre'Aun Steele and her parents, Plaintiffs LEON STEELE and  
5 BRENDA BYRD, including, but not limited to a:

- 6           a. duty to investigate, research, study, and otherwise become informed about the  
7           serious and unique health risks involved in orally ingesting cannabinoids,  
8           including but not limited to THC;
- 9           b. duty to warn of the likelihood, probability and foreseeability that orally ingesting  
10           cannabinoids, including but not limited to THC can cause adverse health effects  
11           and serious injury, including but not limited to respiratory depression, trouble  
12           breathing, tremors, stroke, increased heart rate, arrhythmia, cardiovascular  
13           complications and vascular conditions that increase the risk of myocardial  
14           infarction, and negative effects on the brain and brain stem functioning;
- 15           c. duty to warn that the Product could cause serious injury, negative health effects,  
16           and death;
- 17           d. duty to warn to seek immediate medical attention when certain health  
18           complications and symptoms result after ingestion of the Product;
- 19           e. duty to disclose the risks and dangers of consuming the Product;
- 20           f. duty to provide accurate information on the risks and dangers of the Product  
21           and the negative effects on health;
- 22           g. duty to test its products to ensure it is safe for consumption before sale;
- 23           h. duty to research, learn and otherwise become knowledgeable about the Product's  
24           dangers before sale;
- 25           i. duty to conduct tests, studies and/or research related to its and safe  
26           cannabinoids extraction methods, recipes, production methods, and  
27           manufacturing methods before embarking on new and experimental methods  
28           and selling the products derived therefrom, including the Products and subject

1 Product;

- 2 j. duty to act as a reasonable company would act in the same or similar  
3 circumstances to avoid harm to others, including its consumers, decedent  
4 Bre'Aun Steele, and Plaintiffs LEON STEELE and BRENDA BYRD; and  
5 k. duty to use reasonable care to prevent harm to others.

6 108. KushyPunch CEO Ruben Cross admits Defendants' responsibilities to  
7 consumers, our local community and world in a statement provided on kushypunch.com:  
8 "Our first responsibility is always to the people buying our product. But our second  
9 responsibility is to the world, and specifically to our local community. . . ."

10 109. Here, Defendants breached their duty to decedent and Plaintiffs and were  
11 grossly negligent when they failed to use reasonable care or any care in the planning,  
12 design, production methods, recipes, testing, research, investigation, manufacture, creation  
13 ,distribution, instruction, warning, packaging, labeling, advertising, promotion, and sale of  
14 the Product and Products.

15 110. At all times relevant, it was foreseeable to Defendants that if they were  
16 negligent or failed to use reasonable care in the planning, design, production methods,  
17 recipes, testing, research, investigation, manufacture, creation, distribution, instruction,  
18 warning, packaging, labeling, advertising, promotion, and sale of the Product and  
19 Products, that consumers and members of the public would likely be injured and/or suffer  
20 serious health complications and/or death.

21 111. In doing the acts alleged in this Complaint, Defendants PASSION CARE,  
22 LLC; DESERT ZEN, INC.; VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE  
23 AGENCY, INC.; UL HOLDINGS, INC dba URBN LEAF; and DOES 1 through 50,  
24 inclusive, violated statutes, rules, standards, regulations, and guidelines applicable to  
25 Defendants' conduct, including but not limited to laws and regulations relating to the  
26 manufacture, distribution, and sale of the Product and similar items under Cal Civ Code §  
27 1792.1, as well as California Cultivation Program statutes and regulations, California Food  
28 and Agriculture statues and regulations, and California Code of Regulations, Title 16,



1 Division 42.

2 112. The statutes, regulations, standards, and guidelines violated by Defendants  
3 were drafted, written, and designed to prevent the type of incidents and injuries that  
4 occurred in this case, and Plaintiffs are among the class of persons the statutes, regulations,  
5 standards, and guidelines were designed to protect.

6 113. At all times relevant, Defendants wrongful and negligent actions described  
7 above were done with willful and knowing disregard of the rights or safety of others,  
8 including Decedent Le' Sharia Bre' Aun Steele.

9 114. As a direct result of Defendants' negligence and carelessness, including their  
10 willful and wanton negligence, Plaintiffs' daughter, Le' Sharia Bre' Aun Steele suffered  
11 serious injury, harms and losses, and death.

12 115. As a further direct and legal result of the negligence and carelessness of the  
13 Defendants, and each of them, Plaintiffs have been deprived of the love, care, comfort,  
14 society, companionship, affection, assistance, protection, moral support, training, and  
15 guidance of their daughter, Le' Sharia Bre' Aun Steele, all to their damage in an amount to  
16 be proven at the time of trial.

17 116. As a further direct and legal result of the negligence and carelessness of the  
18 Defendants, and each of them, Plaintiffs have incurred funeral and burial expenses in an  
19 amount to be proven at the time of trial.

20 117. As a further direct and legal result of the negligence and carelessness of the  
21 Defendants, and each of them, Plaintiffs have suffered loss of economic support, gifts, or  
22 benefits that Plaintiffs would have expected to receive from their daughter, and the  
23 reasonable value of household services that she would have provided, the exact amount of  
24 said losses to be proven at the time of trial.

25 118. The negligence and carelessness of Defendants, and each of them, was a  
26 substantial factor in causing the injuries and damages alleged above.

27 119. The injuries and damages to Decedent and Plaintiffs described more fully  
28 above, were a direct and legal result of the violations of the statutes, rules, regulations,

standards, and guidelines by Defendants.

## **SECOND CAUSE OF ACTION**

### **Negligent Product Liability**

#### **(As to all Defendants)**

120. Plaintiffs incorporate each and every allegation above as though fully set forth herein.

121. At all times relevant, Defendants PASSION CARE, LLC; DESERT ZEN, INC.; VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE AGENCY, INC.; UL HOLDINGS, INC dba URBN LEAF; and DOES 1 through 100, inclusive and each of them, were engaged in the manufacture, design, extracting, recipe, testing, producing, inspecting, vending, distributing, introducing into interstate commerce, transporting in interstate commerce, advertising, selling, assembling and recommending for use to the general public the Products and Product described above.

122. At all times relevant, certain of said Products that were the same or similar design, recipe, make and/or batch as the Product, were defectively designed, created, manufactured, tested, studied, maintained, delivered, inspected, and sold, and were in dangerous condition as well as being unsafe for the uses and purpose for which they were intended.

123. Defendants PASSION CARE, LLC; DESERT ZEN, INC.; VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE AGENCY, INC.; UL HOLDINGS, INC dba URBN LEAF; and DOES 1 through 100, inclusive and each of them, owed duties of care to actual and potential customers and consumers with respect to the Products and subject Product. Such duties included but were not limited to: designing, formulating, testing, creating, manufacturing, distributing, selling, and providing the Product in a fashion that was safe to consumers; packaging the Product safely so as to reasonably minimize the potential for injury; labeling the Product so as to reasonably warn consumers of the potential for danger; and reasonably applying knowledge and information from past incidents, complaints, studies, research, reliable publications, observations, reports, experience, and investigation

1 to provide for the safety of consumers with respect to the Products.

2 124. Defendants knew or should have known that if the Product and Products of  
3 the same or similar make, model, and/or batch were not properly and carefully  
4 manufactured, designed, tested, maintained, inspected, delivered, warned, labeled, signed,  
5 and accompanied by safety information and instructions, before sale or distribution to  
6 consumers, it would, if used by any member of the general public, be a substantial factor in  
7 causing serious and permanent injury or death.

8 125. Defendants PASSION CARE, LLC; DESERT ZEN, INC.; VERTICAL BLISS,  
9 INC.; KUSHYPUNCH, INC.; MORE AGENCY, INC.; UL HOLDINGS, INC dba URBN  
10 LEAF; and DOES 1 through 100, inclusive, negligently and carelessly adulterated, added  
11 chemicals to, mixed, manufactured, designed, tested, maintained, inspected, delivered,  
12 labeled, warned, signed, instructed, and sold the KushyPunch Products and Product  
13 described above, so that it was in a dangerous and defective condition and unsafe for the  
14 use and purposes for which it was intended.

15 126. The condition of the KushyPunch Products described above, including the  
16 Product, was known to Defendants, and each of them, or should have been discovered by  
17 them through the exercise of ordinary care and reasonable diligence, but was not disclosed  
18 or made known to purchasers or users of the Product, including Plaintiff's daughter,  
19 Le'Sharia Bre'Aun Steele.

20 127. At all times herein mentioned, purchasers or users of the Products, including  
21 the Product, described above, had no knowledge of the defective condition of the Products  
22 or of any danger in the use of the Products.

23 128. At all times relevant, Defendants, themselves and by and through their  
24 officers, directors, and managing agents, were aware of the probable dangerous  
25 consequences of their conduct in recklessly designing, producing, investigating,  
26 manufacturing, distributing, selling, and choosing not to test for certain harmful substances  
27 and not to test the Products by dose, as well as by failing investigate the safety of its  
28 Products and choosing not to warn, label, or instruct of known dangers, including life-

1 threatening dangers, all while disseminating misleading and false advertisements of the  
2 Products. Defendants further were aware of the probable dangerous consequences of their  
3 violating statutes, rules, standards, regulations, or guidelines applicable to Defendants'  
4 conduct.

5 129. At all times relevant, Defendants, themselves and by and through their  
6 officers, directors, and managing agents, knowingly engaged in the conduct described  
7 above intentionally while they knew or should have known that it was highly probable  
8 that harm would result. With the above knowledge of the consequences of serious injury  
9 and/or life-threatening adverse consequences of consuming their Products, Defendants  
10 willfully and deliberately failed to avoid the consequences by and through their actions  
11 alleged above.

12 130. At all times relevant, Defendants wrongful and negligent actions described  
13 above were done with willful and knowing disregard of the rights or safety of others,  
14 including Decedent Le'Sharia Bre'Aun Steele.

15 131. As a direct result of Defendants' negligence and carelessness, including their  
16 willful and wanton negligence, Plaintiffs' daughter, Le'Sharia Bre'Aun Steele suffered  
17 serious injury and death.

18 132. As a further direct and legal result of the negligence and carelessness of the  
19 Defendants, and each of them, Plaintiffs have been deprived of the love, care, comfort,  
20 society, companionship, affection, assistance, protection, moral support, training, and  
21 guidance of their daughter, Le'Sharia Bre'Aun Steele, all to their damage in an amount to  
22 be proven at the time of trial.

23 133. As a further direct and legal result of the negligence and carelessness of the  
24 Defendants, and each of them, Plaintiffs have incurred funeral and burial expenses in an  
25 amount to be proven at the time of trial.

26 134. As a further direct and legal result of the negligence and carelessness of the  
27 Defendants, and each of them, Plaintiffs have suffered loss of economic support, gifts, or  
28 benefits that Plaintiffs would have expected to receive from their daughter, and the

1 reasonable value of household services that she would have provided, the exact amount of  
2 said losses to be proven at the time of trial.

3 135. The negligence and carelessness of Defendants, and each of them, was a  
4 substantial factor in causing the injuries and damages alleged above.

5 **THIRD CAUSE OF ACTION**

6 **Strict Product Liability - Design and Manufacturing Defect**

7 **(As Against All Defendants)**

8 136. Plaintiffs hereby incorporate by reference each and every allegation  
9 articulated above as though fully set forth herein.

10 137. At the time that the Product left the control of Defendants PASSION CARE,  
11 LLC; DESERT ZEN, INC.; VERTICAL BLISS, INC.; KUSHYPUNCH, INC.; MORE  
12 AGENCY, INC.; UL HOLDINGS, INC dba URBN LEAF; and DOES 1 through 100,  
13 inclusive and each of them, the Product was dangerous and defective as a result of design,  
14 manufacture, creation, alteration, assembly or modification and/or selling by Defendants.  
15 The defects included, but are not limited to, an edible candy-like gummy that appeared  
16 kid-friendly and safe that included THC, several cannabinoids known and unknown,  
17 unnatural chemicals and additives, and other elements and compounds that are known to  
18 be dangerous, to cause adverse health effects and bodily reactions, and to cause effects and  
19 conditions that lead to acute death; improper and unsafe doses of THC and other  
20 cannabinoids, elements, and compounds; improper and inadequate separation of doses;  
21 false and misleading appearance disguised as a children's candy and constituting an  
22 attractive nuisance; improper and inaccurate labeling; labeling with misrepresentations  
23 about the safety and healthiness of the Product; lack of proper instructions related to  
24 delayed onset and duration of effects; and lack of proper, safe and/or adequate warnings.

25 138. At all times relevant, Defendants, and each of them, knew and intended that  
26 the Product would be purchased, used, and orally consumed through ingestion by  
27 members of the general public who would rely on Defendants to safely design, test,  
28 manufacture, create , market, advertise, warn, instruct and distribute the Products and

1 Product in a safe manner and to transmit any relevant warnings and information about the  
2 Product with the Product.

3 139. At the time of the incident giving rise to this Complaint, the Product was  
4 being used and consumed in a manner and fashion that it was intended and that was  
5 foreseeable by Defendants, and each of them, and in a manner in which the Product was  
6 intended to be used.

7 140. Defendants designed and manufactured the Product defectively or knew its  
8 design or manufacture was defective, or both, causing the Product and similar Products to  
9 fail to perform as safely as an ordinary consumer would expect when used in an intended  
10 or reasonably foreseeable manner.

11 141. In addition, the risks inherent in the design of the Product, including serious  
12 injury, adverse reaction, or death, outweigh any benefits of that design.

13 142. At all times relevant, Defendants, themselves and by and through their  
14 officers, directors, and managing agents, were aware of the probable dangerous  
15 consequences of their conduct in recklessly designing, producing, investigating,  
16 manufacturing, creating, distributing, and selling the Products in a dangerous and  
17 defective condition as described above. At all times relevant, Defendants, themselves and  
18 by and through their officers, directors, and managing agents, were aware of the probable  
19 dangerous consequences of not testing for certain harmful substances and not testing the  
20 Products by dose, as well as failing to investigate the safety of its Products. Despite that,  
21 Defendants chose to engage in the wrongful conduct and not to warn, label, or instruct of  
22 known dangers, including life-threatening dangers, all while disseminating misleading and  
23 false advertisements related to the Products.

24 143. At all times relevant, Defendants, themselves and by and through their  
25 officers, directors, and managing agents, knowingly engaged in the conduct described  
26 above intentionally while they knew or should have known that it was highly probable  
27 that harm would result. With the above knowledge of the consequences of serious injury  
28 and/or life-threatening adverse consequences of using their Products in a foreseeable



1 manner, Defendants willfully and deliberately failed to avoid the consequences by and  
2 through their actions alleged above.

3 144. At all times relevant, the dangerous and defective Products, including the  
4 Product, were designed, manufactured, distributed, and sold with willful and knowing  
5 disregard of the rights or safety of others, including Decedent Le’Sharia Bre’Aun Steele.

6 145. As a legal result of the dangerous and defective condition, design and  
7 manufacture of the Product, and failures by the Defendants to warn as alleged  
8 hereinabove, Plaintiffs’ daughter died, and Plaintiffs were injured and suffered damages  
9 and will forever suffer harms, losses and damages as alleged.

10 146. The defects described above were a substantial factor in causing Plaintiffs’  
11 daughter, Bre’Aun Steele’s death and the injuries and damages to Plaintiffs alleged above.

#### 12 **FOURTH CAUSE OF ACTION**

#### 13 **Strict Product Liability - Failure to Warn of Defective Condition**

#### 14 **(As Against All Defendants)**

15 147. Plaintiffs hereby incorporate by reference each and every allegation  
16 articulated above as though fully set forth herein.

17 148. The Product was in a dangerous and defective condition when introduced  
18 into the stream of commerce by the defendants. The Product was so defective that when  
19 used in a way that was reasonably foreseeable, the potential risks of the Product created a  
20 substantial risk of serious injury and/or death to users of the Product and others, and  
21 could and would cause those serious injuries and/or death.

22 149. The Product had potential risks that were known or knowable by the use of  
23 scientific knowledge available at the time of design, manufacture, distribution and sale of  
24 the Product. Defendants knew, or in the exercise of reasonable care, should have known  
25 that the potential or inherent risks presented a substantial danger to users of the Product  
26 because defendants possessed special knowledge of the materials, compounds, elements,  
27 recipes , cannabinoids, ingredients, design, character, look, taste and packaging of the  
28 Product.

1           150. Plaintiffs' daughter, Bre'Aun Steele, Plaintiffs, and ordinary consumers  
2 would not recognize, nor have knowledge that the Product was dangerous and defective.

3           151. Although Defendants possessed special knowledge of the potential risks and  
4 substantial danger to users of the Product and others, Defendants failed to adequately  
5 warn or instruct of the potential risks and dangerous and defective conditions of the  
6 Product.

7           152. At all times relevant, Defendants, themselves and by and through their  
8 officers, directors, and managing agents, were aware of the probable dangerous  
9 consequences of their conduct in recklessly designing, producing, investigating,  
10 manufacturing, distributing, and selling the Products in a dangerous and defective  
11 condition as described above. At all times relevant, Defendants, themselves and by and  
12 through their officers, directors, and managing agents, were aware of the probable  
13 dangerous consequences of not testing for certain harmful substances and not testing the  
14 Products by dose, as well as failing to investigate the safety of its Products. Despite that,  
15 Defendants chose to engage in the wrongful conduct and not to warn, label, or instruct of  
16 known dangers, including life-threatening dangers, all while disseminating misleading and  
17 false advertisements related to the Products.

18           153. At all times relevant, Defendants, themselves and by and through their  
19 officers, directors, and managing agents, knowingly engaged in the conduct described  
20 above intentionally while they knew or should have known that it was highly probable  
21 that harm would result. With the above knowledge of the consequences of serious injury  
22 and/or life-threatening adverse consequences of using their Products in a foreseeable  
23 manner, Defendants willfully and deliberately failed to avoid the consequences by and  
24 through their actions alleged above.

25           154. Plaintiffs' daughter, Bre'Aun Steele, died and Plaintiffs were harmed and  
26 suffered the injuries and damages more thoroughly alleged above as a result of  
27 Defendants' willful and knowing failure to adequately warn or instruct Plaintiffs. The lack  
28 of sufficient warnings and instructions was a substantial factor in causing Plaintiffs'

1 daughter's death and Plaintiffs' harms and losses.

2 **FIFTH CAUSE OF ACTION**

3 **Negligent Misrepresentation**

4 **(As Against All Defendants)**

5 155. Plaintiffs hereby incorporate by reference each and every allegation  
6 articulated above as though fully set forth herein.

7 156. At all times relevant, when Defendants, and each of them, designed,  
8 adulterated, processed, formulated, manufactured, studied, tested, inspected, delivered,  
9 labeled, advertised, marketed, distributed, sold, freely sampled, or placed the Products into  
10 the stream of commerce, Defendants, and each of them, expressly and impliedly  
11 represented to members of the general public, purchasers, and users of the Products,  
12 including Le'Sharia Bre'Aun Steele, that the Products were of merchantable quality and  
13 safe for their intended or reasonably foreseeable use.

14 157. Defendants, and each of them, made these representations and induced  
15 members of the public, including Le'Sharia Bre'Aun Steele, to rely on these representations  
16 through, among other methods, an aggressive and continuous marketing campaign using  
17 deceptive, erroneous, misleading, and false advertisements and misleading packaging.  
18 This campaign was designed to conceal the true risks of the Products including adverse  
19 health effects, acute adverse symptoms and side effects, serious injury, and death, and to  
20 target and lure new users, especially young people and young adults including Le'Sharia  
21 Bre'Aun Steele. The campaign disseminated deceptive, erroneous, misleading, and false  
22 statements concerning alleged benefits and safety, including but not limited to alleged  
23 health-related benefits and uses, including but not limited to claims of treating medical  
24 conditions and psychological symptoms.

25 158. The representations by Defendants, and each of them, were false and untrue  
26 in that the Products were not safe for their intended use. The representations by  
27 Defendants, and each of them, were also false and untrue in that the Products were not of  
28 merchantable quality and instead have very dangerous properties and defects which

1 include adverse health effects, acute adverse symptoms and side effects, serious injury, and  
2 death, and having other defects that cause injury and damage to the users of the Products,  
3 including Bre'Aun Steele.

4 159. Defendants, and each of them, made these representations of their Products'  
5 merchantable quality and safety for intended or reasonably foreseeable use without  
6 reasonable grounds for believing these representations to be true.

7 160. Defendants, and each of them, made these representations of their Products'  
8 merchantable quality and safety for intended or reasonably foreseeable use with the intent  
9 to induce reliance on these representations by the general public, and particularly young  
10 working women, including Le' Sharia Bre'Aun Steele.

11 161. Defendants misrepresentations regarding their Products related to matters  
12 that a reasonable person would find important in determining whether to use their  
13 Products.

14 162. At all times relevant, Plaintiffs' daughter, Le' Sharia Bre'Aun Steele relied to  
15 her detriment on the Defendants' material misrepresentations and omissions in many of the  
16 advertising, marketing, and promotional materials targeted at women, including her.

17 163. Plaintiffs' daughter, Le' Sharia Bre'Aun Steele was killed, and Plaintiffs  
18 suffered the injuries and damages alleged as a result of Defendants' misrepresentations.

19 164. The misrepresentations were a substantial factor in causing Le' Sharia  
20 Bre'Aun Steele's death, and in causing Plaintiffs' harm.

### 21 **PRAYER**

22 WHEREFORE, Plaintiffs pray for judgment against the Defendants, and each of  
23 them, as to each and every cause of action, as follows:

- 24 1. For wrongful death general and special damages according to proof;
- 25 2. For loss of love, care, comfort, society, companionship, affection, assistance,  
26 protection, moral support, training, and guidance according to proof;
- 27 3. For loss of economic support, inheritance, gifts, benefits, and services  
28 according to proof;



# Exhibit A

1 Robert J. Francavilla, SBN 110429  
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5 Telephone: (619) 238-1811  
Facsimile: (619) 544-9232  
6

7 Attorneys for Plaintiffs  
8  
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF SAN DIEGO, CENTRAL DIVISION**  
11

12 LEON STEELE, an individual; BRENDA  
BYRD, an individual,

13 Plaintiffs,  
14

15 v.

16 PASSION CARE, LLC; DESERT ZEN, INC.;  
VERTICAL BLISS, INC.; KUSHYPUNCH,  
17 INC.; MORE AGENCY, INC.; UL  
HOLDINGS, INC dba URBN LEAF; and  
DOES 1 through 50,  
18

19 Defendants.

CASE NO.

**DECLARATION OF SUCCESSOR-IN-  
INTEREST**

20 I, LEON STEELE, declare as follows:

21 1. I make the following declaration of my own knowledge, and if called as a  
22 witness in the above-captioned matter, I could testify competently thereto.

23 2. I am the surviving biological father of my daughter, Le'Sharia Bre'Aun Steele.  
24 My daughter passed away on or about October 27<sup>th</sup>, 2020 after she consumed edible  
25 marijuana products in San Diego, California.

26 3. My daughter, Decedent Le'Sharia Bre'Aun Steele, died intestate.

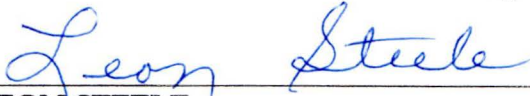
27 4. No proceeding is now pending in California or elsewhere for the  
28 administration of the Decedent Le'Sharia Bre'Aun Steele's estate.

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5. I am the Decedent's successor-in-interest, as defined in Section 377.11 of the *California Code of Civil Procedure* and succeed to the Decedent's interest in the action or proceeding on behalf of and for the benefit of myself and Brenda Byrd, and all other surviving next of kin.

6. No other person has a superior right to commence the action or proceeding or to be substituted for the Decedent in the pending action or proceeding.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 9, 2020, at San Diego, California.

  
LEON STEELE



# Exhibit B

# STATE OF CALIFORNIA

## CERTIFICATION OF VITAL RECORD

### COUNTY OF SAN DIEGO

#### CERTIFICATE OF DEATH

3201837018434

STATE FILE NUMBER		USE BLACK INK ONLY / NO CORRECTIONS, WHITEOUTS OR ALTERATIONS VS-10007(2/08)				LOCAL REGISTRATION NUMBER	
DECEDENT'S PERSONAL DATA	1. NAME OF DECEDENT - FIRST (Given) <b>LE'SHARIA</b>		2. MIDDLE <b>BRE'AUN</b>		3. LAST (Family) <b>STEELE</b>		
	AKA, ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST)				4. DATE OF BIRTH mm/dd/yyyy <b>12/12/1989</b>	5. AGE Yrs <b>28</b>	6. SEX <b>F</b>
	9. BIRTH STATE/FOREIGN COUNTRY <b>AL</b>	10. SOCIAL SECURITY NUMBER <b>416-35-2481</b>	11. EVER IN U.S. ARMED FORCES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK	12. MARITAL STATUS (at Time of Death) <b>NEVER MARRIED</b>	7. DATE OF DEATH mm/dd/yyyy <b>10/27/2018</b>	8. HOUR (24-hour) <b>FND 1405</b>	
	13. EDUCATION - Highest Level (Specify with work sheet on back) <b>BACHELOR</b>	14. WAS DECEDENT HISPANIC/LATIN/SPANISH? (If yes, see worksheet on back) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	15. DECEDENT'S RACE - Up to 3 races may be listed (see worksheet on back) <b>BLACK</b>				
17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED. <b>FLIGHT ATTENDANT</b>			18. KIND OF BUSINESS OR INDUSTRY (e.g. grocery store, road construction, employment agency, etc.) <b>AIRLINES</b>		19. YEARS IN OCCUPATION <b>2</b>		
USUAL RESIDENCE	20. DECEDENT'S RESIDENCE (Street and number, or location) <b>800 MEADOWVIEW STREET</b>						
	21. CITY <b>ATHENS</b>	22. COUNTY/PROVINCE <b>LIMESTONE</b>	23. ZIP CODE <b>35611</b>	24. YEARS IN COUNTY <b>28</b>	25. STATE/FOREIGN COUNTRY <b>AL</b>		
	26. INFORMANT'S NAME, RELATIONSHIP <b>BRENDA BYRD, MOTHER</b>			27. INFORMANT'S MAILING ADDRESS (Street and number, or rural route number, city or town, state and zip) <b>800 MEADOWVIEW STREET, ATHENS, AL 35611</b>			
SPOUSE/SRDP AND PARENT INFORMATION	28. NAME OF SURVIVING SPOUSE/SRDP - FIRST <b>-</b>		29. MIDDLE <b>-</b>		30. LAST (BIRTH NAME) <b>-</b>		
	31. NAME OF FATHER/PARENT - FIRST <b>LEON</b>		32. MIDDLE <b>-</b>		33. LAST <b>STEELE</b>		
	34. BIRTH STATE <b>AL</b>		35. NAME OF MOTHER/PARENT - FIRST <b>BRENDA</b>		36. MIDDLE <b>-</b>		
	37. LAST (BIRTH NAME) <b>BYRD</b>		38. BIRTH STATE <b>AL</b>				
FUNERAL DIRECTOR/ LOCAL REGISTRAR	39. DISPOSITION DATE mm/dd/yyyy <b>11/01/2018</b>		40. PLACE OF FINAL DISPOSITION <b>SOWELL CEMETERY - TANNER, AL 35671</b>				
	41. TYPE OF DISPOSITION(S) <b>TR/BU</b>		42. SIGNATURE OF EMBALMER <b>KEVIN WEAVER</b>		43. LICENSE NUMBER <b>EMB9137</b>		
	44. NAME OF FUNERAL ESTABLISHMENT <b>ANDERSON - RAGSDALE MORTUARY</b>		45. LICENSE NUMBER <b>FD1329</b>		46. SIGNATURE OF LOCAL REGISTRAR <b>WILMA J WOOTEN, MD MPH</b>		
		47. DATE mm/dd/yyyy <b>10/31/2018</b>					
PLACE OF DEATH	101. PLACE OF DEATH <b>FOUND, APARTMENT (OTHER'S)</b>				102. IF HOSPITAL, SPECIFY ONE <input type="checkbox"/> IP <input type="checkbox"/> ER/OP <input type="checkbox"/> DOA <input type="checkbox"/> Home <input type="checkbox"/> Nursing Home/LC <input checked="" type="checkbox"/> Other		
	104. COUNTY <b>SAN DIEGO</b>		105. FACILITY ADDRESS OR LOCATION (Where found (Street and number, or location)) <b>4440 TWAIN AVENUE APT 114</b>		106. CITY <b>SAN DIEGO</b>		
	107. CAUSE OF DEATH Enter the chain of events -- diseases, injuries, or complications -- that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT ABBREVIATE. IMMEDIATE CAUSE (A) <b>PENDING</b> Final disease or condition resulting in death (B) _____ Sequel to a list condition, injury, leading to cause on Line A. Enter UNDERLYING CAUSE (disease or injury that initiated the events resulting in death) LAST (C) _____ (D) _____				108. DEATH REPORTED TO CORONER? (A) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Date Reported: <b>18-02627</b> (B) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (C) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (D) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
	109. BIOPSY PERFORMED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO						
110. ALTOPODY PERFORMED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
111. USED IN DETERMINING CAUSE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107 <b>-</b>							
113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? (If yes, list type of operation and date) <b>-</b>				113A. IF FEMALE, PREGNANT IN LAST YEAR? <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> LINK			
PHYSICIAN'S CERTIFICATION	114. CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. Decedent Attended Since _____ Decedent Last Seen Alive _____		115. SIGNATURE AND TITLE OF CERTIFIER <b>WILMA J WOOTEN, MD MPH</b>		116. LICENSE NUMBER <b>50000</b>		
	117. DATE mm/dd/yyyy (A) _____ (B) _____		118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE <b>WILMA J WOOTEN, MD MPH 3851 ROSECRANS STREET SAN DIEGO, CA 92161</b>				
CORONER'S USE ONLY	119. CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. MANNER OF DEATH: <input type="checkbox"/> Natural <input type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input checked="" type="checkbox"/> Pending <input type="checkbox"/> Could not be determined		120. INJURED AT WORK? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK		121. INJURY DATE mm/dd/yyyy <b>10/30/2018</b>		
	122. PLACE OF INJURY (e.g. home, construction site, wooded area, etc.) <b>-</b>						
	124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury) <b>-</b>						
	125. LOCATION OF INJURY (Street and number, or location, and city and zip) <b>-</b>						
126. SIGNATURE OF CORONER / DEPUTY CORONER <b>JACQUELYN L MORHAIME</b>		127. DATE mm/dd/yyyy <b>10/30/2018</b>		128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER <b>JACQUELYN L MORHAIME, DEP COR</b>			
STATE REGISTRAR		A B C D E		FAX AUTH.#			
				CENSUS TRACT			
				0100010C025657			

County of San Diego - Health & Human Services Agency - 3851 Rosecrans Street. This is to certify that, if bearing the OFFICIAL SEAL OF THE STATE OF CALIFORNIA, the OFFICIAL SEAL OF SAN DIEGO COUNTY and THEIR DEPARTMENT OF HEALTH SERVICES EMBOSSED SEAL, this is a true copy of the ORIGINAL DOCUMENT FILED. This copy not valid unless prepared on engraved border displaying seal and signature of Registrar

*Wilma J. Wooten, M.D.*

DATE ISSUED: 11/7/2018 WILMA J. WOOTEN, M.D., M.P.H.  
REGISTRAR OF VITAL RECORDS  
County of San Diego



ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

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