



**ALESHIRE &  
WYNDER LLP**  
ATTORNEYS AT LAW

ORANGE COUNTY | LOS ANGELES | RIVERSIDE | CENTRAL VALLEY

Robyn K. Moore Hubbard  
rmoore@awattorneys.com

18881 Von Karman Avenue,  
Suite 1700  
Irvine, CA 92612  
P (949) 223-1170  
F (949) 223-1180

AWATTORNEYS.COM

March 6, 2020

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED & U.S. MAIL**

Laurie G. Barnes, Cherokee Funding  
26786 Ironwood Ave.  
Moreno Valley, CA 92555

Tenant, Dynamic Meds  
c/o Alfonso Luera  
4605 Wade Ave.  
Perris, CA 92571

Re: Notice of Criminal Violations of Perris Municipal Code  
(4605 Wade Ave., Perris, CA 92571)

Dear Property Owner and Responsible Parties:

This firm represents the City of Perris as its City Prosecutor and in that capacity enforces the Perris Municipal Code ("PMC") and Perris Zoning Code ("PZC"). The City has requested that we write to you before we take legal action regarding possible violations of the PMC at the above-referenced property. The violations consist of:

- Failing to obtain a business license for Dynamic Meds operating on the property. (PMC § 5.04.010)
- Operating a business without first obtaining a certificate of occupancy. (PMC §§ 16.20.090, 19.50.020(a).)

Violation of City law must be taken seriously. Violations of the City Code may constitute criminal misdemeanors punishable by imprisonment of up to six months and by a fine of up to \$1,000 for each offense. Every day that this property violates the City Code it constitutes a separate offense. Thus, for example, for a violation lasting one week, the owner and occupant each face a fine of up to \$7,000. The City does not favor criminal prosecution of Code violators. The City uniformly seeks cooperation because compliance with the City Code, rather than punishment, is the primary objective. However, the City will enforce its laws.

The City has already provided you with notices and opportunities to correct the Code violations at your property. The City has made a diligent attempt to obtain your cooperation in complying with the Code. As the owner of the property or as the party responsible for the above-mentioned violations, you are individually responsible to correct the stated violations. If you do not promptly comply with the law, the City will have no choice but to pursue taking further action.

Laurie G. Barnes, Cherokee Funding  
Tenant, Dynamic Meds  
c/o Alfonso Luera  
March 6, 2020  
Page 2

In order to bring your property into compliance with City codes you must take the following corrective action by **March 31, 2020:**

- Contact the City's Business License Department at 951.943.6410 ext. 262 to obtain a business license for Dynamic Meds being operated on the property.

We look forward to and expect your complete cooperation in this matter. Should you have any questions regarding how to bring your property into compliance with the Code, please contact John Parker, Code Enforcement Officer, at 951.385.4131.

Very truly yours,

ALESHIRE & WYNDER, LLP

Rohyn K. Moore Hubbard  
Paralegal

RKMH

cc: Ms. Clara Miramontes, Director of Development Services (via email)  
Mr. Robert Trejo, Code Compliance Supervisor (via email)  
Mr. Nathan Perez, Assistant Planner (via email)  
Mr. John Parker, Code Compliance Officer (via email)  
Mr. Eric Dunn, City Attorney (via email)