



June 9, 2019

The Honorable Michael Feuer  
Los Angeles City Attorney  
James K. Hahn City Hall East  
Suite 800  
Los Angeles, CA 90012

Re: Enforcement Against Retailers Selling Tainted Cannabis to the Public  
Southern California Coalition White Paper – "Permanent Enforcement"

Dear Michael:

Our organization is deeply grateful that your office has incorporated the testing of cannabis into enforcement efforts against unlicensed cannabis retailers open to the public. As was the case with the inclusion of landlords in the enforcement process this new tactic is not only the first of its kind, it allows you to move more comprehensively against those who are unlicensed and causing injury. We hope that you will enlarge this program and test not only for pesticides, but for the wide range of toxins which the state has banned in licensed cannabis and cannabis products.

As we began to talk to elected and appointed officials, as well as our coalition partners and colleagues, it became clear that most were unaware of the dangers posed by contaminated cannabis. Additionally, the long term economic damage done to licensed entities by the unfair competition unlicensed entities engaged in, was well understood, but the fact that Social Equity Licensees would be pushed into almost immediate bankruptcy by these same unfair business practices was less discussed.

The attached white paper "Permanent Closure" is our attempt to support recommendations already being acted on by the City (i.e. recouping enforcement costs) as well as additional suggestions our organization feels might be helpful. Our goal was to produce a teaching tool, which would help us educate, as well as generate support for the immediate closure and dismantling of entities which are poisoning the public.

It is in no way meant to be an attack on, or a critique of, the City Attorney's office. It is our understanding that between 2013 and the present time the City Attorney's office has closed over one thousand unlicensed cannabis businesses. This is an achievement unparalleled anywhere in the country. We understand that the continued existence of illicit cannabis



businesses is largely due to events out of the City's control such as the transmutation of cannabis felonies into misdemeanors by Proposition 64. We are confident that the City Attorney's new approach, identifying and immediately prosecuting those who are putting the public at risk, will result in the swift and permanent closure of businesses which are engaging in life-threatening behavior.

We are available if you would like to meet to discuss this issue. Our Executive Director, Adam Spiker, can be reached at: [adam@southerncaliforniacoalition.com](mailto:adam@southerncaliforniacoalition.com) or (714) 654-1930.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sarah", is written over the typed name.

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Encl: White Paper "Permanent Closure"

Cc: The Honorable Eric Garcetti  
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## **Permanent Closure**

Suggestions for Ending the Presence  
of  
Unlicensed Cannabis Retailers  
Open to the Public

Founded four years ago, the Southern California Coalition is the Southland's largest trade association for cannabis stakeholders. It is unique in that it has meaningful partnerships with organizations like Americans for Safe Access and organized labor. Our board includes participation by veterans, social equity candidates and women. The Southern California Coalition was an early, strong supporter of the Los Angeles Social Equity Program. The organization works closely with legislators at the local, state and federal level to ensure cannabis policies are inclusive and fair. Our Executive Director, Adam Spiker, can be reached at: (714) 654-1930 or [adam@southerncaliforniacoalition.com](mailto:adam@southerncaliforniacoalition.com)



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## Introduction

This white paper is not a critique of previous or current enforcement efforts. The City of Los Angeles (the City) has adopted a wide array of enforcement techniques. It has diligently pursued closures since 2013. The comprehensive list of retailers closed by the City has been taken off the City Attorney's website, but as early as 2015, the City Attorney's office had already closed over 500 shops.<sup>1</sup>

On April 17, 2019, the City Attorney's office took another ground-breaking step in ending the proliferation of unlicensed establishments, when it launched the first civil enforcement action in California to allege cannabis sold by an unpermitted location contains pesticide.

Our organization urges the City, in the strongest possible terms, to continue testing cannabis and cannabis products in unlicensed shops. When contaminated products are found, the site should be immediately barricaded, and the owners and landlords prosecuted to the full extent of the law.

The proliferation of contaminated cannabis products sold by unlicensed shops is a state-wide problem.<sup>2</sup> Because the effects of pesticide poisoning and the accumulation of heavy metals in the body are cumulative they may not fully manifest immediately after exposure. The failure to close shops peddling poison may precipitate a health crisis that drags on for years.

The leadership of the City Attorney's office in this area may well become the template for how this problem is eradicated throughout the state.

There is another compelling reason for closing these shops via a combination of charges and fines so onerous that the shop cannot relocate and re-open.

The current proliferation of unlicensed shops creates an environment where licensed shops, who are paying taxes and carrying heavy regulatory costs cannot compete with illicit operators. Many of these shops are small businesses still operated by their Pre-ICO founders. They are being driven towards bankruptcy because they are surrounded by rogue operators whose lack of tax burdens and regulatory costs means they can offer products at a steeply discounted rate.

Additionally, the only way to ensure the success of the Social Equity Program is to eradicate all illicit retail operators, and to do so in a way which makes it impossible for any other bad actor to take their place. If this does not happen, social equity retailers serving the public will come into a marketplace so saturated with unlicensed competition that they will be unable to acquire enough market share to survive.

Thus, it would be prudent to examine how current enforcement tools can be enhanced and what new methods can be employed to eradicate the remaining illegal retail cannabis businesses.



Poisoning the public, knowingly misrepresenting products in the interests of maximizing revenues, selling counterfeit items, maintaining an unsafe workplace, these are all activities that injure workers and the public. They should not be tolerated by the City of Los Angeles.

In the following sections we propose solutions which would strengthen enforcement efforts and help bring about the permanent closure of cannabis retailers whose behavior is so egregious that they present an ongoing threat to the public's safety and welfare.

**IT SHOULD BE NOTED THAT THIS WHITE PAPER ADDRESSES ONLY ENFORCEMENT RELATED TO UNLICENSED RETAIL OUTLETS OPEN TO THE PUBLIC. BOTH THE PUBLIC AND STAKEHOLDERS HAVE MADE IT CLEAR THAT THESE ENTITIES ARE PROBLEMATIC AS WELL AS CONSTITUTING THE BULK OF COMPLAINTS COUNCIL OFFICES RECEIVE RELATING TO CANNABIS BUSINESSES. BECAUSE THEY ARE OPERATING IN PLAIN VIEW, THEY ARE EASILY LOCATED AND ENFORCED AGAINST, ALLOWING THE CITY TO PRUDENTLY SPEND ITS ENFORCEMENT MONIES.**



### **Continuing to Test Products Coming from Unlicensed Shops Will Separate Those Operating a Business Without a License from Those Poisoning the Public**

It's important that the City differentiate between someone operating a business without a license and those who are operating businesses which impact the health and safety of the public.

The easiest and fastest way to do this is to make multiple purchases at a location that is unlicensed and test the cannabis and cannabis products with tests identical to those that licensed cannabis and cannabis products are required to pass before they can be sold to the public.

The City Attorney's office has already identified and closed one shop whose products were a threat to the public's health and safety. Our organization hopes the City will zealously pursue the identification of other shops similarly situated.

This is an expensive process, but necessary to ensure the health and safety of the public. To offset this cost the City is already contemplating an ordinance that requires recovery of all expenses related to the shutdown of unlicensed shops.<sup>3</sup> The Southern California Coalition and its coalition partners stand in strong support of this motion and have already begun outreach to other groups, such as organized labor and social equity groups to try and garner as much support for the motion as possible.

The City should also carefully scrutinize the products, as many of them may be counterfeit.

Once a location selling poisoned or counterfeit products is identified, the City should immediately shut down the business, and seize all cash and inventory. The entity is contributing to a health and safety problem and should be prosecuted to the full extent the law allows.

### **Dismantling Illegal Businesses Will Permanently End Unlicensed Retail Cannabis Activity**

Enforcement must not merely close down illegal retailers but must also render them bereft of all assets that would enable the illegal actor to reopen in another location or sell the business to a successor-in-interest.

Currently it appears that the City's enforcement is focused on closing illicit retail businesses, not dismantling them. This method means all the entity's assets are still intact, the business just can't operate at its current location. All it needs is a new address, the illicit operators have everything else they need: inventory, fixtures, employees and cash.

Recently, the City turned off the power at an unlicensed cannabis retailer but left the business intact<sup>4</sup>. When the Los Angeles Times contacted the business, a spokesperson indicated that the illegal entity would re-open in ten days.





## **Methods for Dismantling Illegal Retail Operations Which Entertain the Public**

### **Barricading the Business in Addition to Turning Off the Power**

Simply shutting down the power has resulted in illegal shops acquiring generators and immediately re-opening. Another method for closure must be found<sup>5</sup> While the City can issue tickets for an unpermitted generator this may, depending on how much money the shop is making, just be shrugged off as the cost of doing business.

The idea that dismantling a business works better than just closing it down, is greatly aided by a new, proposed enforcement tool which allows rogue shops to be locked up and barricaded. Barricading relieves the City of the obligation to seize bulky fixtures, such as huge display cases, and other things necessary to run the business.

Seizure of assets prior to conviction has long been a drug war tactic and we'd like to avoid it here. Simply locking everything up until things can be sorted out in court is a softer approach and provides a real incentive for both the property owner and the business operator to begin negotiations with the City Attorney or proceed into court.

Failure to seize inventory and any cash relating to the business may materially aid the illegal entity in re-opening. In cases where the operator has been engaging in serious crimes, like poisoning the public, seizure of inventory and cash are prudent steps to end life-threatening behavior.

### **Seizure of the Cannabis Inventory**

The most clear and present danger to the public is contaminated cannabis and cannabis products.<sup>6</sup> Thus, before prioritizing closures, the City should determine which shops are selling unsafe products or engaging in other serious crimes.

There is a very important reason to test the inventory of an unlicensed entity before any other actions are taken. Under State law, cannabis licensees can only do business with other licensees.<sup>7</sup> This means cannabis testing labs cannot test the cannabis or cannabis products that rogue retailers carry.

Because those who grow this illegal product are more interested in yield than safety, there's a high probability the cannabis and cannabis products in these shops are contaminated with pesticide residue and other deadly substances.<sup>8</sup>

All cannabis and cannabis products in these illicit shops should be tested, with the rogue operator paying for the testing.

If the results show the inventory is contaminated, civil nuisance abatement should be abandoned. The operation should be shut down immediately and the stiffest penalties possible, including incarceration, should be pursued.





There's a high probability that the products in illegal stores will test positive for pesticides but there are many other things that should be tested for including heavy metals, fungus and fecal matter. Testing should rise to the level required of legal licensed cannabis businesses.

### **Discouraging Employment at Unlicensed Shops**

Discouraging current employees and ensuring that the operator has no ability to hire replacements may materially hinder the operator's ability to re-establish the business at a new location.

Councilman Marqueece Harris-Dawson has opined that fining or issuing tickets to employees may well be punishing those who have no ownership stake in the business and are exactly the people the City's Social Equity Program has been established to help. We agree with this idea but believe incentives and a path forward are necessary.

Entry level employees at rogue shops are most likely young and may have been lied to about the shop's unlicensed status. Workers should be educated about rogue businesses and the dangers they present, not punished. Many first-time employees may not understand that being paid "under the table" or with cannabis is a serious labor law violation.

Those new to the cannabis workforce may not know that being paid in cash means no social security money is accruing for their retirement. Nor is the business contributing to the employee's unemployment benefits.

Cannabis sold in these shops is untested and often contains pesticides and other contaminants. The free cannabis these workers often get in lieu of pay or as part of their compensation, can cause irreparable damage or death.

Their injuries may be cumulative and not fully manifest during the period of their employment. Once the symptoms do manifest, it would be very difficult for the employee to obtain redress from the business.

The longer someone is employed in a business that's selling contaminated product, the more likely they are to fall ill. This is not a new phenomenon. In 2005 a woman who had done a lot of trimming of contaminated cannabis died of complications relating to that contamination.<sup>9</sup>

Rogue shops are attractive robbery targets if they don't have guards and are open very late in locations where police response time is longer. If a worker is injured on the job, there is no Workman's Compensation Insurance.

We recommend that non-management employees be issued tickets and told that if they return to work for the rogue operator, more tickets will accrue.

However, if they complete an online tutorial within three months of the issuance, ticket fees would be waived; and the ticket is dismissed. The tutorial would be free, costs of the program would be underwritten by the rogue employers.



This video tutorial produced in collaboration with the appropriate state agencies would teach employees about workers' rights. Explain how to tell an illegal employer from a legal one. Educate workers about where they can find employment in the legitimate cannabis industry and how to sign up for an apprenticeship program.

It would also explain how employees can apply for unemployment benefits. Their employer has most likely told them that they are independent contractors, but a recent California Supreme Court case would allow these employees to collect benefits.<sup>10</sup> Other benefits which might be needed until the individual can find work, such as the CalFresh Program, could also be discussed.

If the employee was sexually harassed or the workplace was hostile the tutorial will explain how to pursue a claim.

Most importantly, the tutorial would explain how those who are eligible might participate in the Social Equity Program or otherwise benefit from City mandated hiring programs. One example of a City-mandated hiring program would be the regulation which encourages cannabis employers to hire within a three mile radius of the business (See: Los Angeles Municipal Code Chapter X Article 4 section 104.11 (m)).

Educating employees working at unlicensed locations will discourage employees from working in unlicensed shops and help transition employees into the legal workplace.

Additionally, involving government agencies who regulate workman's compensation insurance, payroll taxes or other business requirements, might be a useful tool for helping to ensure unlicensed operators are estopped from operating businesses that compromise the health and safety of workers.

#### **Deadbeat Dads**

Another deterrent is ensuring that employees being paid in cash, are not skipping out on child support. The Los Angeles County Child Support Services Department is responsible for child support operations and might be interested in partnering with the City to identify those avoiding child support payments. Once it becomes clear to the employee that they can no longer avoid their obligations by working for rogue businesses, it will discourage this type of employee from returning to work at an unlicensed shop.

#### **Tactics Which Make Re-opening or Selling Illegal Businesses Impossible After Closure**

##### **Collaborative Efforts Which Might Help End Patronage of Unlicensed Shops**

The Department of Cannabis Regulation (the DCR) might want to create a webpage on its site which publishes the results of lab tests along with the name and address of the illegal business, so that patrons can see exactly which products tested dirty and what they were contaminated with.

This would help doctors determine what treatment would be most effective for those who are experiencing the onset of symptoms whose origins are due to pesticide or some other kind of poisoning.

PSA's which supporters can import on to their websites is another tool the City Attorney might want to collaborate with the DCR on.





Mendocino Sherriff, Thomas Allman produced a PSA on poisoned products and posted it on the Sheriff Department Facebook page. It migrated to other places, and has generated 17, 904 viewings. You can view the PSA at this link:

<https://www.facebook.com/watch/?v=2337253743006287>

### **Taxation as a Method of Cost Recovery**

One of the hallmarks of an illegal cannabis business is the failure to pay taxes.

Illegal businesses which are beyond a nuisance and a true danger to the public, are going to require a lot of resources to close down if they are to be shuttered quickly.

The criteria for taxation is taxable sales, not legal operation. Thus, the City can, and should, collect whatever taxes it can. By being first on the scene, before other taxing agencies arrive, means the City has the highest probability of collecting the maximum of back taxes.

Imposing a tax lien is a useful way to signal to other municipalities that the operator has a history of unpaid obligations.<sup>11</sup> It helps stop the operator from being able to move to a new jurisdiction and acquire a license.

Lastly, the California Department of Tax and Fee Administration (the CDFTA) is interested in moving aggressively to collect California Sales Tax from unlicensed operators. If this would not interfere with the collection of taxes owed by illicit operators to the City, the City might want to consider a collaboration with the CDFTA.

The Southern California Coalition is part of the CDFTA task force and suggests that the City liaison with Ms. Jennifer Hawkins who coordinating the task force. Her contact information is:

Jennifer Hawkins

Business Taxes Specialist

California Department of Tax and Fee Administration

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### **Targeted Public Information Campaigns Relating to Closure**

When law enforcement closes a store selling contaminated product, this should be widely publicized so that those who bought contaminated products know not to use them.

Typically, the rogue operator is advertising on Weedmaps and may have a website for his business. He may also have carefully collected the emails of his customers so he can communicate about sales and specials. Once closed, the operator should be obligated to remove everything from his Weedmaps page and business website except a notice in large type which says:





**THE CITY OF LOS ANGELES HAS CLOSED THIS FACILITY BECAUSE IT IS UNLICENSED. THE INVENTORY OF THIS BUSINESS WAS TESTED AND WAS FOUND TO CONTAIN IMPURITIES, SOME OF WHICH MAY HAVE A PROFOUND EFFECT ON CONSUMER HEALTH.**

**THE CITY OF LOS ANGELES URGES ANYONE WHO HAS PURCHASED ITEMS FROM THIS LOCATION NOT TO CONSUME, SMOKE OR OTHERWISE INGEST THOSE PRODUCTS, BUT RATHER, DISPOSE OF THEM IN A MANNER WHICH WILL NOT CONTAMINATE THE PURCHASER OR OTHERS.**

**INFORMATION ON HOW TO DISPOSE OF CONTAMINATED CANNABIS AND CANNABIS PRODUCTS CAN BE FOUND ON THE CITY'S WEBSITE AT: \_\_\_\_\_.**

When the building is barricaded, a similar sign should be posted in the window of the business and be large enough to be seen from the street. Typically, patrons will simply drive to the location, so it's very important that once the illegal entity is closed, that the sign remain in the window for several months.

Lastly, every email address the operator has collected should receive a message similar to that outlined above.

Anyone who removes a sign or notice before 120 days has elapsed should be subject to heavy fines, and the requirement that the sign or notice be posted for an additional 120 days.

#### **Other Dangerous and Illegal Practices Which Endanger the Public**

Illegal operators often "cut" cannabis with things to make them seem more potent or otherwise increase the effects purchasers are looking for. One of the more disturbing additives was gunpowder, which was thought to help cannabis burn longer and more efficiently. This was not the case.<sup>12</sup>

Pain is the number one reason patients use cannabis.<sup>13</sup> Rogue operators are not above doctoring up their products. Fentanyl, the most dangerous illicit substance existent, was recently found in cannabis seized in upstate New York.<sup>14</sup>

The maximum felony fines and jail time allowable when someone knowingly circulates a deadly product should be imposed on the operator of the shop, particularly if the flower came from the operator's personal grow.

Pesticide contamination has been linked to physical and mental health issues including suicide.<sup>15</sup> Heavy metal contamination can cause a number of medical problems. Even a tiny amount of Fentanyl can kill.

When it's clear that an illegal operation is circulating products with deadly additives, the City needs to abandon civil nuisance abatement and move quickly to indict the wrong-doer to the full extent the law allows.

#### **Unregulated Products Which Exceed State Mandated Dosages**

Currently, the State Department of Public Health mandates standard dosages for licensed edible cannabis products, which are not to exceed a certain level.<sup>16</sup> The state cannabis regulatory agencies



cannot currently prosecute illegal entities. However, language in this year's Trailer Bill will give them that power, as well as the power of local entities to act on the state's behalf.<sup>17</sup>

All edibles seized from an illegal operator should be tested to determine what the level of THC in the product is. Edible products sold in illegal shops may contain dosages far in excess of what the law allows or what might be advisable to ingest in a single setting.

Obviously, if an illegal operator is selling products which contain far more THC than is legally allowed in a licensed product, this is another area where prosecutors should consider adding charges.

#### **Counterfeit Products and Knock-Offs**

Examining the inventory of an unlicensed shop closely is essential for another reason. Anecdotal evidence indicates unlicensed entities are selling counterfeit versions of licensed cannabis products.

Licensed products are required to carry a lot of information on the label, including batch numbers. Tracing back these batch numbers or the absence of batch numbers would quickly indicate that the inventory is counterfeit and would allow the City to add charges attaching to this crime.

#### **Legal Products in Unlicensed Shops**

Another area which might be fruitful to explore is when licensed products carrying authentic batch numbers show up at unlicensed locations. Two scenarios present themselves:

1. A licensed manufacturer is selling products to unlicensed shops.
2. A licensed shop owner who also controls unlicensed shops is simply acquiring licensed product at his legal location then placing it at his unlicensed entities.

In either case, licensed entities who are shown to be profiting from sales activities at illegal shops, should permanently forfeit their licenses and be prosecuted to the full extent the law allows.

#### **Misrepresenting the THC Content or Otherwise Misrepresenting the Product**

Another area where illegal shops may dupe customers is by falsifying the THC content of products or claiming that flower is a popular strain when it is not. Some strains are universally popular (i.e. Blue Dream) and all licensed operators try to keep them on their shelves.

Illegal operators may claim a strain is something it is not. Consumers often want products with a high THC content. As a result, illegal operators may lie about THC content. If lab tests show product was mischaracterized, felony charges should be added.

### **Miscellaneous Tactics to Aid Enforcement**

#### **Sales to Minors**

The City is considering using the same tactics it employs to identify entities selling tobacco products to minors<sup>18</sup> at cannabis businesses. A motion should be added which would allow the City to immediately close any facility which is proved to have sold cannabis or cannabis products to minors.





### **Red Tagging and Electrical Inspections**

Historically, the City's Building and Safety Department did not inspect cannabis facilities. This means any alterations or repairs made to an illegal cannabis operation may not have been done in a safe or compliant manner.

Building and Safety Personnel did sometimes accompany officers who were raiding cannabis businesses and while inspecting these facilities did uncover enough violations to deem the building unsafe. This is a valuable tool for ending the use of unsafe buildings for any business and should be incorporated into the City's enforcement toolbox.

Often, illegal retail outlets are located in small retail spaces which may not be able to handle the electrical load a cannabis business imposes on the location, particularly if the business is growing on-site. Inspections which show a clear hazard from overloaded electrical systems can be a legally sufficient reason to close down the location immediately and should be utilized by the City.

### **Prioritizing Enforcement in Underserved Areas**

There has been a persistent perception that enforcement against unlicensed retailers has not been uniform throughout the City. The proliferation of unlicensed shops in the Crenshaw Corridor as well as Van Nuys has given rise to rumors that enforcement has been concentrated in more affluent areas.

We would urge the City to review the zip codes of all shops that have been enforced against, so that the City Attorney might determine if the proliferation in some areas has gone unchecked. If this is the case, we would urge the City to first enforce in areas that have received little attention.

Historically, drug dealers have "dumped" new, cheap types of drugs in poorer areas. The most famous case locally was the crack cocaine epidemic in South Central Los Angeles.<sup>19</sup> This raises the question of whether unlicensed shops in poorer areas are in fact outlets for products too contaminated to pass muster in wealthier areas where "bag appeal"<sup>20</sup> not price, is the motivating factor.

We urge the City, in the strongest possible terms, to begin testing cannabis flower and products on offer in unlicensed shops in the poorer sections of the City.

The Southern California Coalition, its members, coalition partners, and wide array of colleagues, would like to work in tandem with the appropriate city departments, city leaders, our friends in organized labor, community leaders, and other like-minded cannabis stakeholders to see how much of the above can be put into action and when it can start.

This is an opportunity for unity in an effort all of us have been asking for in different ways and at different times. We owe as broad an effort as possible to the citizens that passed Prop M, to the city leaders who put their reputations on the line to push it through, and to the city departments involved and tasked currently with licensing, regulating and enforcing.

Most particularly, we owe a united, successful enforcement effort to the licensed operators that are hanging on for dear life financially as a result of unlicensed competition. Without meaningful





enforcement, the successful implementation of our social equity program which so many around the state, country, and even the world, are watching and hoping to emulate, will fail.

We hope that you will find the suggestions and solutions outlined above helpful. The Southern California Coalition looks forward to working with the City of Los Angeles on this issue.

Respectfully submitted,  
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## Annotations and References

<sup>1</sup> <https://www.laweekly.com/news/500-weed-shops-closed-under-la-city-attorney-mike-feuers-reign-5483194>

<sup>2</sup> Pesticides in Illegal Pot: A Budding Health Crisis, Foster Williams, June 6, 2019 Marijuana Times  
<https://www.marijuanatimes.org/pesticides-in-illegal-pot-a-budding-health-crisis/?fbclid=IwAR3PUy1iqPV4tE3GXcYlmuPp7Gol-1d2kUdA4j-J21kGfMHnyw8Xi0GsUZo>

<sup>3</sup> [http://clkrep.lacity.org/online/docs/2014/14-0366-S28\\_ord\\_draft\\_05-30-2019.pdf](http://clkrep.lacity.org/online/docs/2014/14-0366-S28_ord_draft_05-30-2019.pdf)

<sup>4</sup> <https://www.latimes.com/local/lanow/la-me-weed-pot-dispensaries-illegal-marijuana-weedmaps-black-market-los-angeles-20190529-story.html>

<sup>5</sup> <https://www.latimes.com/local/lanow/la-me-weed-pot-dispensaries-illegal-marijuana-weedmaps-black-market-los-angeles-20190529-story.html>

<sup>6</sup> <https://www.wired.com/story/california-cannabis/>

<sup>7</sup> See: California code of regulations title 16 division 42. Bureau of cannabis control Chapter 1 Article 3 Section 5032(a) (b)

<sup>8</sup> [https://scholar.google.com/scholar?as\\_vis=0&q=marijuana+pesticide+contamination&hl=en&as\\_sdt=1,5&as\\_ylo=2018](https://scholar.google.com/scholar?as_vis=0&q=marijuana+pesticide+contamination&hl=en&as_sdt=1,5&as_ylo=2018)

<sup>9</sup> <https://www.counterpunch.org/2005/10/29/jane-weirick-death-of-an-organizer/>

<sup>10</sup> Dynamex Operations West, Inc. v. Superior Court of Los Angeles No. S222732 (Cal. Sup. Ct. April 30, 2018)  
A helpful blog on this subject can be found at: <https://myemail.constantcontact.com/California-Supreme-Court-Adopts-New-Tighter-Standard-For-Classifying-Workers-As-Independent-Contractors.html?soid=1101808608741&aid=PFFF46Hf5HU>

<sup>11</sup> <http://info.sambrotman.com/blog/ftb-tax-liens-credit-report>

<sup>12</sup> <https://forum.grasscity.com/threads/laced-with-gunpowder.1305103/>

<sup>13</sup> <https://bedrocan.com/wp-content/uploads/the-medicinal-use-of-cannabis-and-cannabinoidsan-international-cross-sectional-survey-on-administration-forms-sexton-2016.pdf>

<sup>14</sup> [https://www.oneidadispatch.com/news/local-news/fentanyl-laced-marijuana-found-in-sullivan-county/article\\_c55e8d74-5d96-11e9-ab97-3325a4902dfa.html](https://www.oneidadispatch.com/news/local-news/fentanyl-laced-marijuana-found-in-sullivan-county/article_c55e8d74-5d96-11e9-ab97-3325a4902dfa.html)

<sup>15</sup> <https://www.scientificamerican.com/article/high-rates-of-suicide-depression-linked-to-farmers-use-of-pesticides/?redirect=1>

<sup>16</sup> See: California Code of Regulations, Title 17 Division 1 Chapter 13. Article 2. Section 40315 (a-d).



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<sup>17</sup> [http://www.dof.ca.gov/Budget/Trailer\\_Bill\\_Language/documents/Cannabis.pdf](http://www.dof.ca.gov/Budget/Trailer_Bill_Language/documents/Cannabis.pdf)  
pages 2-3 section 26031.5 (a-g))

<sup>18</sup> [http://clkrep.lacity.org/online/docs/2014/14-0366-S29\\_mot\\_05-15-2019.pdf](http://clkrep.lacity.org/online/docs/2014/14-0366-S29_mot_05-15-2019.pdf)

<sup>19</sup> [https://www.democracynow.org/1998/5/11/cia\\_crack\\_connection\\_reporter\\_releases\\_new](https://www.democracynow.org/1998/5/11/cia_crack_connection_reporter_releases_new)

<sup>20</sup> "Bag appeal" is a slang term referencing consumer attraction to flower that is fresh and attractive, with a healthy amount of trichomes that can be seen under a magnifying glass. Flower with strong bag appeal can be sold as "top shelf" product, the most expensive cannabis on offer in a shop.