

ACCELA ONLINE SUBMISSION FAILURE

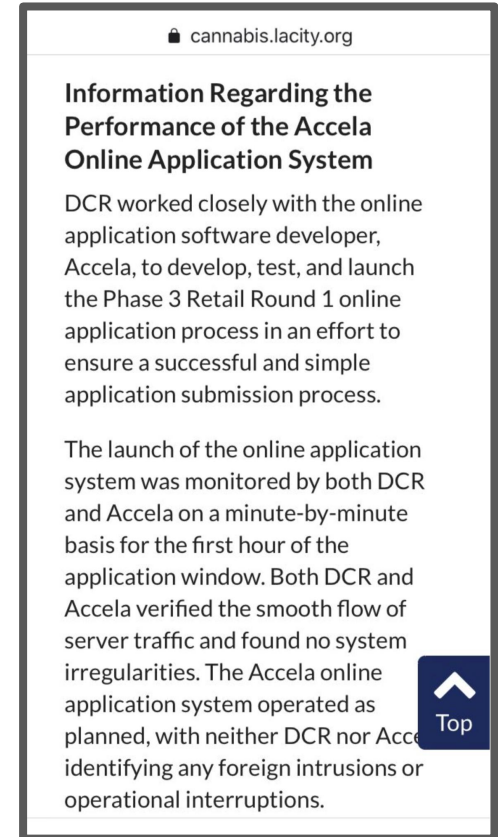
CITY OF LOS ANGELES SOCIAL EQUITY
PHASE 3 RETAIL ROUND 1

DCR STATEMENT REGARDING PERFORMANCE OF ONLINE APPLICATION

“Both DCR and Accela verified the smooth flow of server traffic and found no system irregularities. The Accela online application system operated as planned, with neither DCR nor Accela identifying any foreign intrusions or operational interruptions.”

After nearly two years of delays and setbacks, the City of Los Angeles Social Equity Program has succumbed to public corruption. first round of Phase 3 Commercial Cannabis Licensing for 100 Social Equity retail storefront dispensaries. This phase of licensing was intended to prioritize victims of the failed **WAR ON DRUGS**.

The following evidence creates reasonable doubt that the application system “operated as planned” and that the process was subverted by data manipulation.

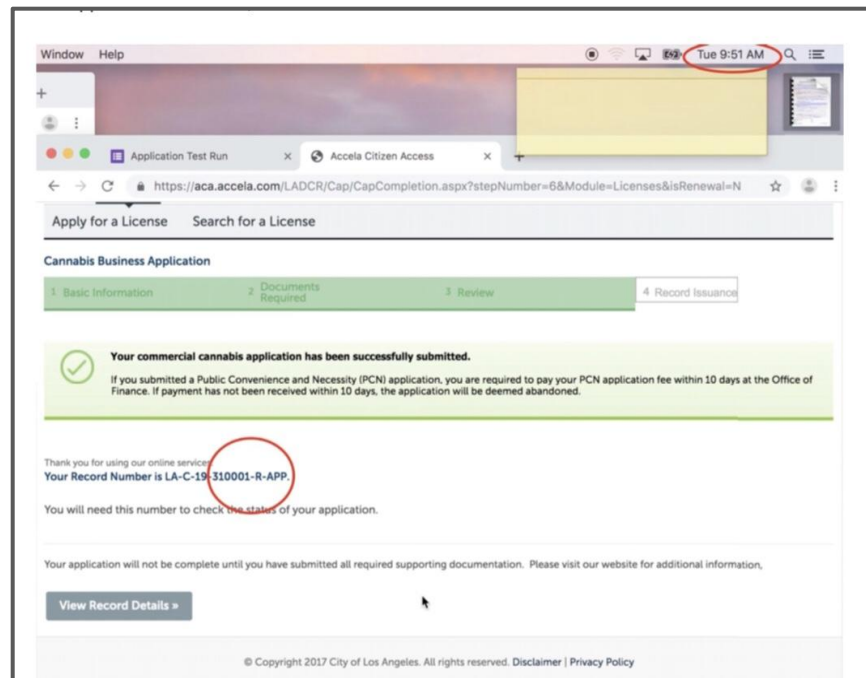


The screenshot shows a webpage from cannabis.lacity.org. The title is "Information Regarding the Performance of the Accela Online Application System". The text on the page reads: "DCR worked closely with the online application software developer, Accela, to develop, test, and launch the Phase 3 Retail Round 1 online application process in an effort to ensure a successful and simple application submission process." Below this, it says: "The launch of the online application system was monitored by both DCR and Accela on a minute-by-minute basis for the first hour of the application window. Both DCR and Accela verified the smooth flow of server traffic and found no system irregularities. The Accela online application system operated as planned, with neither DCR nor Accela identifying any foreign intrusions or operational interruptions." There is a "Top" button in the bottom right corner of the screenshot.

FAILURE #1: ACELA SYSTEM OPENED EARLY

A Social Equity Applicant successfully submitted his online application at ***9:51am**, Tuesday morning of September 3rd. **MORE THAN 8 MINUTES BEFORE OFFICIAL 10AM SYSTEM OPENING.**

The person completed the application and pressed submit which triggered the assignment of **Record ID #001**. It was the first application submitted, well before the stated 10am start time.





*SCREEN RECORDING AVAILABLE



FAILURE #2: BREACH OF PUBLIC TRUST

On September 26th, the DCR published the Phase 3 Retail Round 1 Submissions list of names and time stamps of all 802 Social Equity applications submitted.

Subsequently, Record #001 was given a false timestamp of 10:01:28 am.

 **Phase 3 Retail Round 1 Submissions**
(09/03/19 10am to 09/17/2019 10am) 

Review Order	Submission Date	Timestamp	Record #	Last Name	First Name
51	9/3/2019	10:01:25 AM	LA-C-19-310053-R-APP	Shubunka	Brandon
52	9/3/2019	10:01:26 AM	LA-C-19-310054-R-APP	Shahnazarian	David
53	9/3/2019	10:01:26 AM	LA-C-19-310055-R-APP	Baber	Ishman
54	9/3/2019	10:01:26 AM	LA-C-19-310056-R-APP	Sargsyan	Anushavan
55	9/3/2019	10:01:26 AM	LA-C-19-310057-R-APP	Khachatryan	Maksim
56	9/3/2019	10:01:27 AM	LA-C-19-310058-R-APP	DE LEON	FATIMA
57	9/3/2019	10:01:27 AM	LA-C-19-310060-R-APP	Dorsey	Phyllis
58	9/3/2019	10:01:28 AM	LA-C-19-310059-R-APP	Mejia	Anibal
59	9/3/2019	10:01:28 AM	LA-C-19-310001-R-APP	Redway-Upshur	Jumane
60	9/3/2019	10:01:28 AM	LA-C-19-310061-R-APP	Sayegh	Johnny
61	9/3/2019	10:01:28 AM	LA-C-19-310062-R-APP	Haghverdi	Aram
62	9/3/2019	10:01:28 AM	LA-C-19-310063-R-APP	Moore	Patrick
63	9/3/2019	10:01:28 AM	LA-C-19-310064-R-APP	Hale	Norma
64	9/3/2019	10:01:28 AM	LA-C-19-310065-R-APP	Jones	Murial
65	9/3/2019	10:01:28 AM	LA-C-19-310066-R-APP	Toro	Christopher
66	9/3/2019	10:01:29 AM	LA-C-19-310068-R-APP	Mikael	Sevak
67	9/3/2019	10:01:29 AM	LA-C-19-310069-R-APP	Espinoza	Javier
68	9/3/2019	10:01:29 AM	LA-C-19-310070-R-APP	Gonzalez-Ramirez	Daisy
69	9/3/2019	10:01:30 AM	LA-C-19-310071-R-APP	Del Rosso	Joshua
70	9/3/2019	10:01:30 AM	LA-C-19-310072-R-APP	Pacheco	Angelica
71	9/3/2019	10:01:31 AM	LA-C-19-310067-R-APP	Machado	Luis
72	9/3/2019	10:01:31 AM	LA-C-19-310073-R-APP	Fraise	Darrell
73	9/3/2019	10:01:31 AM	LA-C-19-310074-R-APP	Castro	Cesar
74	9/3/2019	10:01:31 AM	LA-C-19-310075-R-APP	Flores	Alfonso
75	9/3/2019	10:01:31 AM	LA-C-19-310076-R-APP	Kuljis II	Christopher

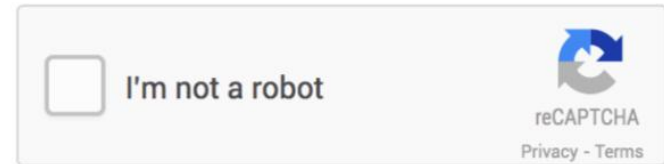
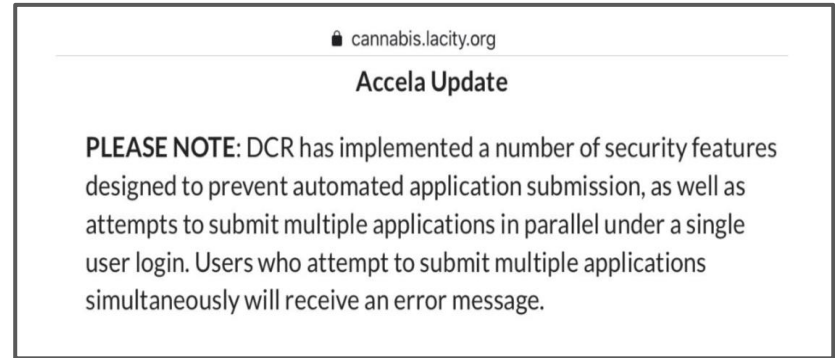
 3 of 33 - 9/26/2019 

FAILURE #3: NO PROTECTION FROM BOTS OR AUTOMATION

The primary protection against the use of automation or bots is a **CAPTCHA request**.

Multiple applicants screen recordings* show the security feature was **disabled for at least the first 2 minutes** after the application process officially started at 10am, allowing bots to go unblocked.

*SCREEN RECORDINGS AVAILABLE



FAILURE #4: NO PROTECTION FOR SUBMISSION OF MULTIPLE APPLICATIONS

Phase 3 Retail Round 1 Submissions (09/03/19 10am to 09/17/2019 10am)					
CLUSTERS OF CONCERN					
Review Order	Submission Date	Timestamp	Record #	Last Name	First Name
421	9/3/2019	10:04:26 AM	LA-C-19-310428-R-APP	Aldana	Miguel
431	9/3/2019	10:04:37 AM	LA-C-19-310438-R-APP	Aldana	Miguel
202	9/3/2019	10:02:05 AM	LA-C-19-310203-R-APP	Batres	Genara
258	9/3/2019	10:02:23 AM	LA-C-19-310260-R-APP	Batres	Genara
339	9/3/2019	10:03:00 AM	LA-C-19-310344-R-APP	Batres	Genara
785	9/17/2019	1:16:05 AM	LA-C-19-310857-R-APP	Bona	Christopher
786	9/17/2019	1:20:03 AM	LA-C-19-310858-R-APP	Bona	Christopher
787	9/17/2019	1:23:07 AM	LA-C-19-310859-R-APP	Bona	Christopher
788	9/17/2019	1:24:04 AM	LA-C-19-310860-R-APP	Bona	Christopher
789	9/17/2019	1:25:13 AM	LA-C-19-310861-R-APP	Bona	Christopher
790	9/17/2019	1:30:17 AM	LA-C-19-310862-R-APP	Bona	Christopher
147	9/3/2019	10:01:50 AM	LA-C-19-310148-R-APP	Bowens	Brian
237	9/3/2019	10:02:17 AM	LA-C-19-310239-R-APP	Bowens	Brian
056	9/3/2019	10:01:27 AM	LA-C-19-310058-R-APP	Deleon	Fatima
102	9/3/2019	10:01:40 AM	LA-C-19-310104-R-APP	Deleon	Fatima
405	9/3/2019	10:04:08 AM	LA-C-19-310412-R-APP	Deleon	Fatima
586	9/3/2019	10:14:06 AM	LA-C-19-310610-R-APP	Deleon	Fatima
605	9/3/2019	10:17:53 AM	LA-C-19-310632-R-APP	Deleon	Fatima
666	9/3/2019	10:32:12 AM	LA-C-19-310699-R-APP	Deleon	Fatima
763	9/6/2019	10:50:52 AM	LA-C-19-310816-R-APP	Deleon	Fatima
764	9/6/2019	10:58:16 AM	LA-C-19-310817-R-APP	Deleon	Fatima
106	9/3/2019	10:01:41 AM	LA-C-19-310107-R-APP	Hill-Negrete	Randall
145	9/3/2019	10:01:50 AM	LA-C-19-310146-R-APP	Hill-Negrete	Randall
423	9/3/2019	10:04:28 AM	LA-C-19-310430-R-APP	Hill-Negrete	Randall
293	9/3/2019	10:02:37 AM	LA-C-19-310297-R-APP	Kang	Yun
324	9/3/2019	10:02:50 AM	LA-C-19-310329-R-APP	Kang	Yun
479	9/3/2019	10:06:45 AM	LA-C-19-310492-R-APP	Kang	Yun
642	9/3/2019	10:24:43 AM	LA-C-19-310674-R-APP	Kang	Yun
027	9/3/2019	10:01:14 AM	LA-C-19-310030-R-APP	Mejia	Anibal
058	9/3/2019	10:01:28 AM	LA-C-19-310059-R-APP	Mejia	Anibal
356	9/3/2019	10:03:11 AM	LA-C-19-310361-R-APP	Mejia	Anibal
502	9/3/2019	10:07:38 AM	LA-C-19-310518-R-APP	Okoronkwo	Maryann
521	9/3/2019	10:08:39 AM	LA-C-19-310538-R-APP	Okoronkwo	Maryann
388	9/3/2019	10:03:36 AM	LA-C-19-310393-R-APP	Ovvensii	Ernie

DCR stated, “Users who attempt to submit multiple applications simultaneously will receive an **error message.**”

The presence of duplicate applications with time stamps indicates the **failure of Accela system to identify/deploy error messages** to submissions that were aided by automation or submitted in parallel under a single user login.

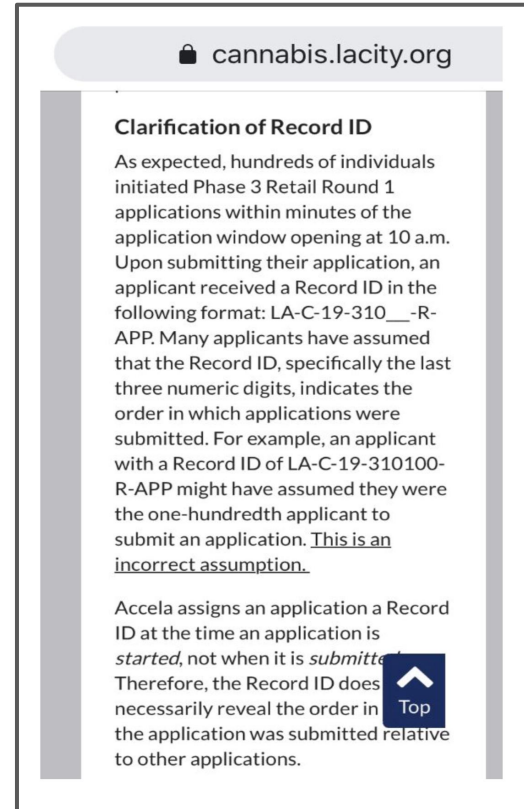
398	9/3/2019	10:03:54 AM	LA-C-19-310405-R-APP	Ovvensii	Ernie
492	9/3/2019	10:07:16 AM	LA-C-19-310505-R-APP	Ovvensii	Ernie
197	9/3/2019	10:02:04 AM	LA-C-19-310198-R-APP	Pineda-Aldana	Gerardo
256	9/3/2019	10:02:22 AM	LA-C-19-310258-R-APP	Pineda-Aldana	Gerardo
041	9/3/2019	10:01:23 AM	LA-C-19-310043-R-APP	Ross	Christian
269	9/3/2019	10:02:25 AM	LA-C-19-310272-R-APP	Ross	Christian
641	9/3/2019	10:24:43 AM	LA-C-19-310673-R-APP	Ross	Christian
516	9/3/2019	10:08:27 AM	LA-C-19-310533-R-APP	Ross	Lenson
540	9/3/2019	10:09:16 AM	LA-C-19-310559-R-APP	Ross	Lenson
019	9/3/2019	10:01:10 AM	LA-C-19-310021-R-APP	Saghiankalimi	Mansour
021	9/3/2019	10:01:11 AM	LA-C-19-310024-R-APP	Saghiankalimi	Mansour
024	9/3/2019	10:01:14 AM	LA-C-19-310027-R-APP	Saghiankalimi	Mansour
234	9/3/2019	10:02:15 AM	LA-C-19-310236-R-APP	Saghiankalimi	Mansour
051	9/3/2019	10:01:25 AM	LA-C-19-310053-R-APP	Shubunka	Brandon
340	9/3/2019	10:03:00 AM	LA-C-19-310345-R-APP	Shubunka	Brandon
556	9/3/2019	10:10:31 AM	LA-C-19-310575-R-APP	Shubunka	Brandon
206	9/3/2019	10:02:07 AM	LA-C-19-310207-R-APP	Sude	Joshua
232	9/3/2019	10:02:15 AM	LA-C-19-310234-R-APP	Sude	Joshua
020	9/3/2019	10:01:11 AM	LA-C-19-310023-R-APP	Suffolk	Andrew
098	9/3/2019	10:01:40 AM	LA-C-19-310100-R-APP	Suffolk	Andrew
270	9/3/2019	10:02:26 AM	LA-C-19-310273-R-APP	Suffolk	Andrew
612	9/3/2019	10:18:37 AM	LA-C-19-310639-R-APP	Suffolk	Andrew
043	9/3/2019	10:01:23 AM	LA-C-19-310045-R-APP	Woods	Rabin
306	9/3/2019	10:02:41 AM	LA-C-19-310310-R-APP	Woods	Rabin

FAILURE #5: MISINFORMATION- CLARIFICATION OF RECORD ID#

This statement by the DCR claiming that Record ID#'s were triggered when application was started is inaccurate.

Screen Recordings* and the list subsequently provided by the DCR show a direct correlation between the Record ID# and the ending time stamp, indicating it was actually triggered when the application was completed.

*SCREEN RECORDINGS AVAILABLE



The screenshot shows a webpage from cannabis.lacity.org. The page title is "Clarification of Record ID". The main text explains that hundreds of individuals initiated Phase 3 Retail Round 1 applications within minutes of the application window opening at 10 a.m. Upon submitting their application, an applicant received a Record ID in the following format: LA-C-19-310__-R-APP. Many applicants have assumed that the Record ID, specifically the last three numeric digits, indicates the order in which applications were submitted. For example, an applicant with a Record ID of LA-C-19-310100-R-APP might have assumed they were the one-hundredth applicant to submit an application. This is an incorrect assumption. The text concludes that Accela assigns an application a Record ID at the time an application is started, not when it is submitted. Therefore, the Record ID does not necessarily reveal the order in which the application was submitted relative to other applications. A "Top" button is visible at the bottom right of the text area.

FINDINGS BY EXPERT AUDIT OF ACCELA ONLINE SUBMISSION PROCESS

After a thorough review of the Accela Online Submission process, the following are the findings of an Industry Expert (Chief Design Architect and Data Management Specialist). This Expert possesses an extensive background of over 35 years experience in the design, development and implementation of complex databases.

1) BAD PLANNING: The gap between **screen recording #1** and **screen recording #2** was most likely due to **insufficient resources** for the block of transactions that came in at that moment. SR#2 barely missed the bottleneck but SR#1 hit it. This can be a millisecond difference in. This tells me the City of Los Angeles **did NOT allocate sufficient resources** to the process.

2) DATA MANIPULATION: The first Record ID was assigned prior to 10AM based on the recorded video yet has a posting time recorded well after 10AM. This is a significant issue. The application that got the first Record ID# prior to 10AM was erroneously assigned a posting time of 10:01:29. **This is data manipulation.**

3) RECORD ID# MISINFORMATION: The DCR said that the Record ID was assigned at application start. Yet we have again SR#2 and SR#1 starting the process within the same second yet they got records ID's assigned to them 25 apart. There is video evidence that shows SR#1 got stalled by resource contention about the right amount of time to cause her to get a ID 25 higher than SR#2. **Clearly the record ID's were assigned at the final submit.**

4) INADEQUATE SECURITY FEATURES: In the initial few minutes of the the application process there was **NO "BOT" check (captcha process)** for logging into the system. A full 3 minutes after the start we begin seeing a captcha process implemented. This means that it's **almost impossible to say "No automated processes were used"**.

PUBLIC CORRUPTION

CITY OF LOS ANGELES SOCIAL EQUITY
PHASE 3 RETAIL ROUND 1

PUBLIC CORRUPTION: BREACH OF TRUST

The Department of Cannabis Regulation has the duty to serve the interest of all constituents in the City of Los Angeles. In particular, with the passing of Measure M, there was an additional obligation to uphold the intent of the Social Equity Program. However, after a nearly two year delay, the Social Equity Program has succumb to BREACH OF PUBLIC TRUST.

PRIORITY PROCESSING & BUSINESS, LICENSING, AND COMPLIANCE ASSISTANCE was supposed to be provided for marginalized community members that were disproportionately affected by the War on Drugs. Instead this assistance has been afforded to **PREDATORY** Corporate Investors. To this date, The City of Los Angeles has **YET** to provide BLC Assistance to SEA's.

The following evidence displays the DCR's City Attorney, Alex Freedman, corresponding with investors and subsequently changing the rules to their benefit by amending the lease agreement requirements on the Department's website.



Alex Freedman is a Deputy Los Angeles City Attorney and since January 2018 he has served as in-house counsel to the Los Angeles Department of Cannabis Regulation and the Los Angeles Cannabis Regulation Commission. In that role, Alex is responsible for drafting all of the city's cannabis ordinances and regulations, advising DCR on the design and implementation of all facets of its cannabis licensing and regulatory program, and advising the Commission on all of its licensing activities.

SATURDAY CORRESPONDENCE WITH ALEX FREEDMAN AND CORPORATE INVESTOR

Prior to 4:12pm, **Saturday**, August 17th, the DCR's official website stated "the LEASE or property deed must be in the legal name of the Applicant applying for the license." After, Corporate Investor, Unity Road (formerly known as ONE Cannabis), made a special request to Alex Freedman to change the rules to include "sub-leases" for their personal benefit, **the DCR website was change to reflect their request.**

From: Alexander Freedman <alexander.freedman@lacity.org>
Sent: Saturday, August 17, 2019 5:50:37 PM
To: Baruch HaLevi <Baruch@ocginc.com>
Cc: Mike Weinberger <Mike@ocginc.com>; Christian Hageseth <Christian@ocginc.com>; Adam Spiker <adam@spikerconsultinggroup.com>
Subject: Re: Sub-lease Confirmation

An executed sublease works. I'm going to add a clarification to the website on Monday.

-Alex

On Aug 17, 2019, at 4:12 PM, Baruch HaLevi <Baruch@ocginc.com> wrote:

Hi Alex,
Appreciate you taking the time to speak with Chris and I about this.
Adam received confirmation from the state that sub-leases are allowed.
I passed on to our application writing team that according to you, the DCR will also allow a sublease between us and our SEA, however, they sent this back in response. Just to be crystal clear so we can put this to bed and wrap up our application, ONE Cannabis can be the lessee and sub-let this property to our SEED Partner who will be named on the application and this is acceptable to the DCR?

Thanks again,
Baruch

<image001.jpg>

Rabbi Dr. Baruch HaLevi ("Rabbi B")
Director of SEED – Social Equity & Economic Development

ONE Cannabis Group (OCG)
100 Garfield Street Suite 400
Denver CO 80206 USA

DCR WEBSITE PRIOR TO 8/17/19

applicant seeks to engage in commercial cannabis activity must be submitted in the application. Such agreements are allowed to contain an opt-out clause in the event an applicant is not eligible for Phase 3 Retail Round 1 application processing, or does not ultimately receive a Retail license. Please note that DCR will not accept non-binding documents, such as letters of intent to lease or purchase a property.

The lease or property deed must be in the legal name of the Applicant applying for the license.

Applicants seeking to provide a lease agreement must also provide a proof of deposit. Proof of deposit for a lease in the form of a financial record that reflects the deposit, including but not limited to a copy of a check, money order, or financial institution document may be submitted.

Business Premises Diagram

A business premises diagram must be submitted that meets the following requirements:

- The diagram shall be to scale;
- The diagram shall show the

AMENDED DCR WEBSITE AS OF 8/19/19 (INCLUDES SUBLEASE)

Executed Lease, Property Deed or Purchase Agreement

An Applicant must submit an executed, binding lease, sublease, purchase agreement or property deed for its proposed business premises. Such agreements may contain an opt-out clause in the event an applicant is not eligible for Phase 3 Retail Round 1 application processing, or does not ultimately receive a Retail license. DCR will not accept non-binding documents, such as letters of intent to lease or purchase a property.

The lease, sublease, purchase agreement or property deed, must be in the legal name of the Applicant applying for the license.

An Applicant who has secured its business premises by a lease or sublease must also provide proof of deposit, which may be a nominal amount, by submitting a financial record that reflects the deposit, including but not limited to a copy of a check, money order, or financial institution document.

DCR 8/16/19 WORKSHOP PRESENTATION

Prior to 8/17/19, **ALL** presentations to the PUBLIC from the DCR provide detailed requirements for the Executed Lease or Purchase Agreement... **SUBLEASE is not included in the list of requirements.**

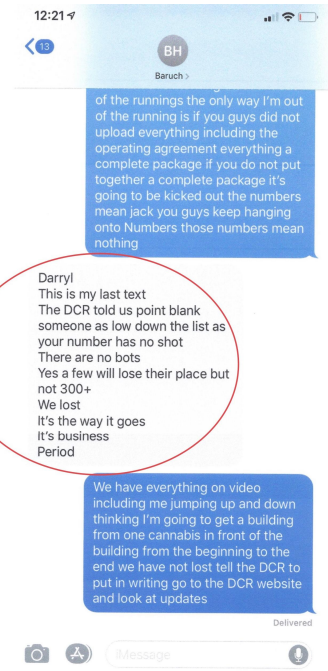
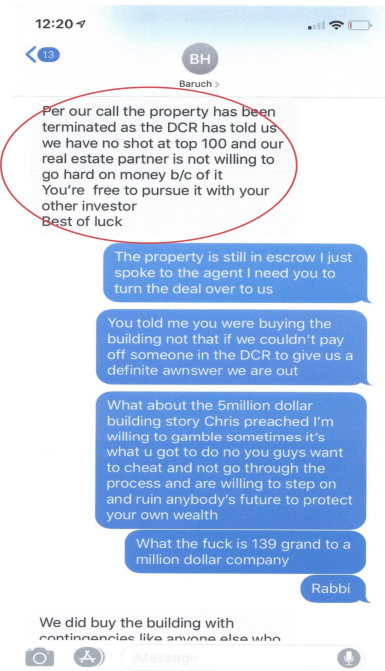
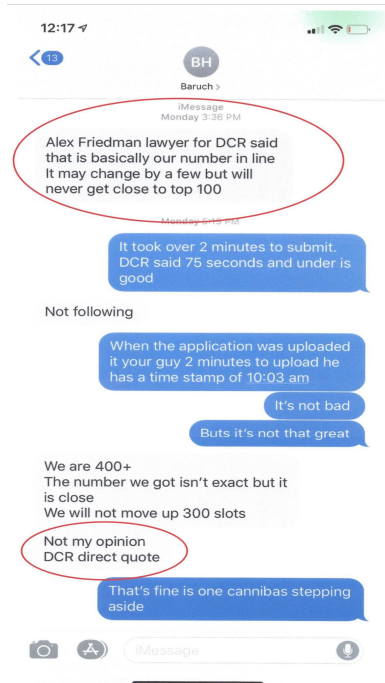
Application Documents: Executed Lease or Purchase Agreement

- An Applicant must submit an executed, binding agreement to lease or purchase; however, such agreements may contain an opt-out clause in the event an applicant is not eligible for Round 1 processing or does not ultimately receive a Type 10 license. **DCR will not accept a non-binding letter of intent to lease or purchase a property**
- If one of the owners of the application owns the Business Premises and is leasing it to the Applicant, then the Applicant must provide a lease agreement
- An Applicant may submit proof of deposit for a lease in the form of a financial record that reflects the deposit, including but not limited to a copy of a check, money order, or financial institution document

3

1

BREACH OF CONFIDENCE: TEXT MESSAGES W/ INVESTOR AND SOCIAL EQUITY APPLICANT



Prior to the public release of information on September 26th, it was a conflict of interest for the DCR attorney to give investors information regarding a Social Equity Applicants application process. On Monday, September 9th, a Social Equity applicant was notified by his investor, via text message, that their agreement was TERMINATED, "We lost, it's the way it goes, it's business PERIOD," based on confidential information released by DCR City Attorney, ALEX FREEDMAN.