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8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES - CENTRAL DISTRICT

11 20STCP04269

12 PARADISE FACTORY, LLC, a California)
Limited Liability Company, THE VAN)
13 NUYS GROUP, LLC, a California Limited)
Liability Company, and CALIVA)
14 CADINH1, INC., a California Corporation,)

Case No.:

**PETITION FOR WRIT OF
MANDAMUS**

15 Petitioners,

16 vs.

17 CITY OF LOS ANGELES, a Municipal)
Entity, CITY OF LOS ANGELES)
18 DEPARTMENT OF CANNABIS)
REGULATION, a Municipal Entity, CAT)
19 PACKER, in her official capacity, DOES 1)
through 100, inclusive,)

20 Respondents.
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1 Petitioners PARADISE FACTORY LLC, THE VAN NUYS GROUP LLC, and
2 CALIVA CADINH1, INC. (collectively, “Petitioners”) petition for a combined writ of
3 mandate under Code of Civil Procedure sections 1085 and 1094.5, directed to
4 Respondents CITY OF LOS ANGELES, CITY OF LOS ANGELES DEPARTMENT OF
5 CANNABIS REGULATION (“DCR”), and DCR’s director, CAT PACKER
6 (collectively, “Respondents”). Petitioners operate cannabis businesses in the City of Los
7 Angeles pursuant to temporary licenses known as Temporary Approvals, which are
8 issued and regulated by DCR pursuant to the Los Angeles Municipal Code (“LAMC”).
9 LAMC requires that Petitioners renew their Temporary Approvals annually by paying a
10 renewal fee sixty days before the end of the year. DCR emailed Petitioners in September
11 2020 regarding the upcoming renewal deadline, and while DCR vaguely referred to a
12 renewal submission not specified in the LAMC, DCR specifically told Petitioners their
13 renewal fee invoices would not be generated until DCR had all the renewal information it
14 needed from Petitioners. In October, DCR sent Petitioners their renewal fee invoices,
15 which Petitioners thus understood as the only remaining requirement for renewal.
16 Petitioners paid their several-thousand-dollar renewal fees by the November 2 deadline.
17 In December, DCR emailed Petitioners claiming that they had failed to submit a renewal
18 application and that their Temporary Approvals would therefore terminate on December
19 31. DCR further stated that Petitioners would thus lose the ability to operate lawfully in
20 Los Angeles and that they were not entitled to administrative review of the termination of
21 their Temporary Approvals. The City Council then proposed a motion to retroactively
22 renew the Temporary Approvals of Petitioners and similarly situated companies but will
23 not consider the motion until January. On December 22, DCR agreed not to take any
24 enforcement actions against Petitioners until March 1, 2021 based on DCR’s expectation
25 that the City Council will resolve the issue by then. But notwithstanding this assurance,
26 in the meantime, Petitioners’ Temporary Approvals will technically terminate based on
27 DCR’s arbitrary, capricious, and unlawful interpretation of the LAMC and Petitioners
28 will be deprived their right to administrative review as guaranteed by the LAMC.

1 By the Petition, Petitioners further allege as follows:

2 **THE PARTIES**

3 1. Petitioner PARADISE FACTORY LLC (Los Angeles Cannabis Business
4 License Number LA-C-18-000301-APP) is a limited liability company located at 385
5 West 20th Street, Los Angeles, CA 90731.

6 2. Petitioner THE VAN NUYS GROUP, LLC is a limited liability company
7 doing business as The Green Easy (Los Angeles Cannabis Business License Number LA-
8 C-19-001756-APP) at 8311 Beverly Blvd., Los Angeles, CA 90048.

9 3. Petitioner CALIVA CADINH1, INC. (Los Angeles Cannabis Business License
10 Number LA-C-18-000039-APP) is a corporation, formerly known as Asclepius,
11 Incorporated, located at 7127 Vineland Avenue, Unit 4 & 5, North Hollywood, CA
12 91605.

13 4. Respondent CITY OF LOS ANGELES is a public entity organized and existing
14 under the laws of the State of California, and is a “local agency” within the meaning of
15 Code of Civil Procedure section 562a(d)(1).

16 5. Respondent CITY OF LOS ANGELES DEPARTMENT OF CANNABIS
17 REGULATION (“DCR”) is responsible for administering the commercial cannabis
18 licensing and regulatory program established by the Los Angeles City Council.
19 Specifically, DCR processes all applications for commercial cannabis licenses in the City
20 of Los Angeles, makes licensing decisions or licensing recommendations to the Cannabis
21 Regulation Commission, and regulates the operations of licensed commercial cannabis
22 businesses in the City. DCR is responsible for deciding to terminate Petitioners’
23 Temporary Approvals, even though Petitioners complied with the Los Angeles Municipal
24 Code requirements and timely paid their renewal fees.

25 6. Respondent CAT PACKER is the Executive Director of DCR and, at all relevant
26 times, had supervisory authority for DCR and its licensing and regulatory program.

27 **JURISDICTION AND VENUE**

28 7. The Supreme Court, courts of appeal, superior courts, and their judges have

1 original jurisdiction in proceedings for extraordinary relief in the nature of mandamus
2 directed to any inferior tribunal, corporation, board, or person. (Cal. Const., art. VI, § 10;
3 *see* Code Civ. Proc., §§ 1084 [“mandamus” synonymous with “mandate”], 1085.]

4 8. A petitioner requesting a writ of mandate may bring a combined petition under
5 both Code of Civil Procedure section 1085 and Code of Civil Procedure section 1095.
6 (*Conlan v. Banta* (2002) 102 Cal.App.4th 745, 751–752.)

7 9. The Superior Court for the County of Los Angeles, the county where
8 Respondents are located and operate, is the proper court for the hearing of this action.
9 (Code Civ. Proc., § 395.)

10 **LEGAL FRAMEWORK**

11 **A. Proposition 64**

12 10. On November 8, 2016, California voters passed Proposition 64, which
13 legalized adult, recreational use of marijuana and reduced criminal penalties for various
14 offenses involving marijuana, including its cultivation and possession for sale. (*County*
15 *of Kern v. Alta Sierra Holistic Exchange Service* (2020) 46 Cal.App.5th 82, 88.)
16 Proposition 64 added and amended sections of numerous California codes, all of which
17 “have an impact on enforcement decisions by California peace officers and prosecutors.”
18 (Com. On Peace Officer Stds. & Training, The Control, Regulate and Tax Adult Use of
19 Marijuana Act <[https://post.ca.gov/proposition-64-the-control-regulate-and-tax-adult-](https://post.ca.gov/proposition-64-the-control-regulate-and-tax-adult-use-of-marijuana-act)
20 [use-of-marijuana-act](https://post.ca.gov/proposition-64-the-control-regulate-and-tax-adult-use-of-marijuana-act)> (as of December 21, 2020).) Proposition 64 encouraged local
21 regulations by cities and counties, such as the ordinance passed by Los Angeles and
22 codified in the Los Angeles Municipal Code (hereinafter “LAMC”). (See Voter
23 Information Guide, Gen. Elec. (Nov. 8, 2014) Analysis by the Legislative Analyst, p. 91
24 [“Local governments will continue to have the ability to regulate where and how medical
25 marijuana businesses operate”].)

26 11. Before the passage of Proposition 64, Proposition D was a voter-approved
27 initiative that codified regulations for Medical Marijuana Businesses in Los Angeles.
28 (*Safe Life Caregivers v. City of Los Angeles* (2016) 243 Cal.App.4th 1029, 1037.) As a

1 result of Proposition 64, Los Angeles repealed Proposition D and replaced it with the
2 current cannabis regulations.

3 12. In December 2017, the Los Angeles City Council adopted comprehensive
4 cannabis licensing regulations and codified them in LAMC Section 104 et seq. Under the
5 LAMC, certain existing retail and non-retail licenses were given temporary licenses,
6 called Temporary Approvals, that allowed them to operate while DCR reviewed their full
7 license applications. On information and belief, three years later, DCR still has not
8 completed its review of any cannabis license application and all legal cannabis businesses
9 in the city are operating under Temporary Approvals.

10 **B. Los Angeles Municipal Code**

11 **1. Licenses and Temporary Approvals**

12 13. Under the LAMC, a business must obtain a license prior to engaging in any
13 commercial cannabis activity. “Commercial Cannabis Activity” is defined as including
14 “the cultivation, possession, manufacture, distribution, processing, storing, laboratory
15 testing, packaging, labeling, transportation, delivery or sale of Cannabis or Cannabis
16 products in the City as provided for in Division 10 of the California Business and
17 Professions Code and the California Code of Regulations[.]” (LAMC, § 104.01(a)(13);
18 § 104.02(a).)

19 14. LAMC § 104.01(a)(28) defines “License” to mean “a City license issued
20 under this article.”

21 15. LAMC § 104.01(a)(47) defines “Temporary Approval” to mean, in part, “a
22 DCR-issued temporary license.”

23 **2. Renewal Procedure**

24 16. As amended in 2020, LAMC § 104.12(a) provides: “To renew a License, a
25 License renewal application and applicable renewal fee shall be paid by the Licensee no
26 earlier than 120 calendar days before the expiration of the License, and no later than 60
27 calendar days before the expiration of the License.”

28 17. However, on information and belief, in practice, DCR has never enforced prior

1 deadlines to pay renewal fees and has always granted Temporary Approval holders
2 lengthy extensions to pay renewal fees. For example, in the case of businesses that did
3 not pay their renewal fees for their 2020 Temporary Approvals by November 2, 2019,
4 DCR allowed those business until August 2020 to pay the renewal fees and allowed them
5 to operate in the interim.

6 **3. Administrative Review**

7 18. If a license renewal is denied, LAMC § 104.12(f), as amended in 2020,
8 allows a licensee to “file an administrative appeal of the decision to deny License renewal
9 pursuant to section 104.14 within 15 days of the date of DCR mailing the denial letter.”

10 **FACTUAL BACKGROUND**

11 **A. DCR Informs Petitioners They Will Only Receive Renewal Fee Invoices Once** 12 **All Requested Information Is Submitted**

13 19. On September 2 and 16, 2020, DCR emailed notice of the upcoming renewal
14 deadline, informing Petitioners that a “2021 renewal invoice will be generated once a
15 Licensee submits all requested information associated with the renewal process and any
16 modification requests through the DCR Licensing portal.” The email emphasized: “**All**
17 **renewal fees must be paid on or before November 2, 2020, or your 2020 Temporary**
18 **Approval(s) will expire after 11:59 p.m. on December 31, 2020.**” (Exhibit 1.)

19 **B. DCR Sends Petitioners Renewal Fee Invoices and Instructs Them To Pay**

20 20. After informing Petitioners that the renewal invoices would be generated after
21 all requested information was received, DCR then generated the invoices and emailed
22 them to Petitioners in mid-October, stating that “Payment for 2021 Renewal Fees are due
23 by Monday, November 2, 2020. (Exhibit 2.) These emails also stated that the invoice
24 could be accessed under the Accela online platform, but did not otherwise indicate any
25 requirements regarding the use of Accela.

26 **C. Petitioners Timely Pay The Renewal Fees After Receiving the Invoices**

27 21. Petitioner Paradise Factory paid its renewal fee of \$12,699 on November 2,
28 2020. (Exhibit 3.)

1 22. Petitioner The Van Nuys Group paid its renewal fee of \$4,233 on October 13,
2 2020. (Exhibit 4.)

3 23. Petitioner Caliva paid its renewal fee of \$4,233 on October 28, 2020. (Exhibit
4 5.)

5 **D. DCR Threatens to Terminate Petitioners' Licenses For Failure To Submit**
6 **Renewal Applications**

7 24. On December 8, 2020, DCR emailed Petitioners, stating that “Our record [*sic*]
8 indicate that a 2021 License renewal application and/or pay the applicable 2021 License
9 renewal fees by the deadline [*sic*].” (Exhibit 6.) As each of the Petitioners had already
10 timely paid their Temporary Renewal fees for 2021, this sentence appears to indicate that
11 DCR’s position is that a renewal application was required but not submitted by the
12 Petitioners. Indeed, in the same email, DCR then inquired if Petitioners “submitted a
13 2021 License renewal application and paid the applicable 2021 License renewal fees by
14 the deadline,” even though only the latter is actually required. The email then continued:

15 All Licenses that were not timely renewed shall expire after
16 11:59 p.m. on December 31, 2020, in accordance with Los
17 Angeles Municipal Code (LAMC) Section 104.12(a). The
18 determination that a License has expired is final and not
19 reviewable by an administrative appeal. All Persons with
20 expired Licenses shall cease all Commercial Cannabis
21 Activity after 11:59 p.m. on December 31, 2020, until such
22 time that the Person is issued a new License from DCR and a
23 license from the State of California.

20 Please be advised that any Persons who have allowed their
21 Temporary Approval(s) to expire and who continue to engage
22 in Commercial Cannabis Activity are subject to an
23 enforcement action and/or criminal penalties for unlicensed
24 Commercial Cannabis Activity (LAMC Sec. 104.15.)

23 (Exhibit 6, emphasis omitted.)

24 **E. The City Council Intends To Provide Relief for Failure To Timely Pay**
25 **Renewal Fees**

26 25. On December 9, 2020, a member of the City Council’s Planning and Land Use
27 Management (“PLUM”) Committee introduced a motion to provide broad relief to
28 applicants who did not even pay their Temporary Approval renewal fees. (Exhibit 7.)

1 **F. DCR Announces a Temporary Non-Enforcement Policy**

2 26. On December 22, 2020, DCR emailed Petitioners and stated the following:

3 Due to Office of Finance closures and related operational impacts
4 resulting from the ongoing COVID-19 pandemic, members of the
5 Los Angeles City Council introduced a motion, on December 9,
6 2020, to amend Los Angeles Municipal Code (LAMC) Section
7 104.12, among other sections, that would extend license renewal
8 applications for 2020 renewals, and 2021 renewals that would
9 otherwise expire after 11:59 P.M. on December 31, 2020.

7 In light of this COVID-19 related motion and its intention to
8 address the, up to, 57 Applicants/Licensees that would be
9 impacted in its absence, DCR will not proactively report the
10 expired status of any licenses to the Los Angeles Police
11 Department (LAPD) or State agencies, or participate in an
12 enforcement action related to the expiration of the license against
13 any Applicants/Licensees until March 1, 2020 (*sic*).

11 This decision shall in no way constitute a waiver of the DCR's
12 responsibility or right to take any other action under the LAMC,
13 Rules and Regulations, or any other law, and does not preclude
14 another City or State agency from taking independent action.
15 DCR reserves the right to enforce operational violations under
16 DCR's Rules and Regulations or LAMC 104.00 et seq.

14 (Exhibit 8.)

15 27. On December 28, 2020, DCR again emailed Petitioners to confirm that although
16 the December 22 email referred to March 1, 2020, it was intended to refer to March 1,
17 2021. (Exhibit 9.)

18 **FIRST CAUSE OF ACTION**

19 **(WRIT OF ADMINISTRATIVE MANDAMUS)**

20 28. Petitioners hereby incorporate by reference the preceding paragraphs as if fully
21 set forth herein.

22 29. Code of Civil Procedure section 1094.5, subdivision (a) provides that a writ of
23 mandamus or writ of mandate is available to review “any final administrative order or
24 decision made as the result of a proceeding in which by law a hearing is required to be
25 given, evidence is required to be taken, and discretion in the determination of factors is
26 vested in the inferior tribunal, corporation, board, or officer[.]”

27 30. On information and belief, Respondents' actions and decisions are invalid under
28 Code of Civil Procedure section 1094.5 for the following reasons: (1) Respondents failed

1 to grant Petitioners a fair hearing and (2) Respondents committed a prejudicial abuse of
2 discretion, in that Respondents failed to proceed in the manner required by law.
3 Specifically, Respondents failed to grant Petitioners a hearing or opportunity to appeal
4 the refusal to approve their temporary license renewals, even though the California
5 Supreme Court has long made clear that a licensing agency must hold a hearing of a
6 license application it has rejected. (*Fascination, Inc. v. Hoover* (1952), 39 Cal.2d 260,
7 269–271; *see Pomona College v. Superior Court* (1996) 45 Cal.App.4th 1716, 1729.) In
8 so doing, Respondents failed to proceed in a manner required by law.

9 31. Petitioners have exhausted all administrative remedies.

10 32. Petitioners have no plain, speedy and adequate remedy in the ordinary course of
11 law.

12 33. Petitioners are obligated to pay an attorney for legal services to prosecute this
13 action.

14 34. Petitioners are entitled to recover attorney’s fees as provided in Government
15 Code section 800 and Code of Civil Procedure section 1021.5 if Petitioners prevail in the
16 within action, on the ground that, on information and belief, Respondents’ decision was
17 the result of arbitrary and capricious conduct.

18 **SECOND CAUSE OF ACTION**
19 **(WRIT OF TRADITIONAL MANDATE)**

20 35. Petitioners incorporate by reference the preceding paragraphs as if fully set
21 forth herein.

22 36. In the alternative, Petitioners seek a writ of traditional mandamus under Code of
23 Civil Procedure section 1085, which provides that a writ of mandamus or writ of mandate
24 is available “to compel the performance of an act with the law specifically enjoins, as a
25 duty resulting form an office, trust, or station[.]” This includes ministerial duties, which
26 are acts that a public officer is obligated to perform in a prescribed manner required by
27 law when a given state of facts exists. (*Jackson v. Gourley* (2003) 105 Cal.App.4th 966;
28 *see Weisman v. Board of Bldg. and Safety Commrs. Of City of Los Angeles* (1927) 85

1 Cal.App. 493 [Ordinance is a “law,” within statute providing for mandamus to compel
2 performance of act which law specially enjoins].)

3 37. On information and belief, Respondents’ actions and decisions are invalid under
4 Code of Civil Procedure section 1085 because Respondents have a ministerial duty to
5 approve the renewal of temporary licenses for commercial cannabis activities after the
6 renewal fee has been paid pursuant to LAMC section 104.12. Petitioners have a clear,
7 present and direct beneficial interest in, and right to, Respondents’ performance of their
8 legal duty to approve renewal of cannabis licenses when the licensee has complied with
9 the requirements.

10 38. Even though Petitioners have timely paid their renewal fees, following the
11 directions provided by Respondents, Respondents are still refusing to approve the
12 licenses and informed Petitioners that their licenses will expire on December 31, 2020.
13 Respondents have acted arbitrarily, capriciously, and without legal basis in refusing to
14 carry out or discharge their mandatory duties as set forth herein.

15 39. Unless compelled by this Court to perform those acts and duties and to refrain
16 from acts as required by law, Respondents will continue to refuse to perform said duties
17 and continue to violate the law, and Petitioners and others similarly situated will be
18 injured as a result.

19 40. Petitioners have exhausted all administrative remedies.

20 41. Petitioners have no plain, speedy and adequate remedy in the ordinary course of
21 law.

22 **THIRD CAUSE OF ACTION**

23 **(DECLARATORY RELIEF)**

24 42. Petitioners incorporate by reference the preceding paragraphs as if fully stated
25 herein.

26 43. Code of Civil Procedure section 1060 authorizes a court to render a declaratory
27 judgment in cases of actual controversy relating to the legal rights and duties of the
28 respective parties.

1 44. An actual controversy exists between Petitioners and Respondents in that
2 Petitioners contend that Respondents are acting arbitrarily and capriciously and without
3 legal or evidentiary foundation by threatening to terminate Petitioners' licenses without
4 allowing them an administrative hearing.

5 **ATTACHED EXHIBITS**

6 45. **Exhibit 1** is a true and correct copy of DCR's September 2020 emails.

7 46. **Exhibit 2** is a true and correct copy of DCR's October 2020 emails.

8 47. **Exhibit 3** is a true and correct copy of records reflecting Petitioner Paradise
9 Factory's payment of its renewal fee.

10 48. **Exhibit 4** is a true and correct copy of records reflecting Petitioner The Van
11 Nuys Group's payment of its renewal fee.

12 49. **Exhibit 5** is a true and correct copy of records reflecting Petitioner Caliva's
13 payment of its renewal fee.

14 50. **Exhibit 6** is a true and correct copy of DCR's December 8, 2020 emails.

15 51. **Exhibit 7** is a true and correct copy of the City Council's Planning and Land
16 Use Management ("PLUM") Committee motion introduced on December 9, 2020.

17 52. **Exhibit 8** is a true and correct copy of emails DCR's December 22, 2020
18 emails.

19 53. **Exhibit 9** is a true and correct copy of DCR's December 28, 2020 emails.

20 54. Petitioners have made a public records request and will provide the records
21 when Respondents have provided them to Petitioners.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Petitioners pray the court for judgment as follows:

- 24 1. For an administrative writ under Code of Civil Procedure section 1094.5
25 directing Respondents to grant Petitioners a hearing or opportunity to appeal
26 the refusal to approve their license renewals;
27 2. For a writ of mandate under Code of Civil Procedure section 1085 directing
28 Respondents to grant the renewals of Petitioners' licenses;

3. For a declaratory judgment under Code of Civil Procedure section 1060 declaring that DCR cannot terminate Petitioners' licenses without an administrative hearing;
4. For reasonable attorney's fees and litigation expenses as permitted by statute, in addition to any other relief granted or costs awarded;
5. For all costs of suit incurred in this proceeding; and
6. For such other and further relief as the court deems proper.

DATED: December 30, 2020

WERKSMAN JACKSON & QUINN LLP

By:



Michael G. Freedman
Kimberly E. Barreto
Attorneys for Petitioners

VERIFICATION

I, BRETT BALSIGER, am the Owner of PARADISE FACTORY LLC, a Petitioner in this action. I have read the foregoing petition and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief and the allegations specific to the other petitioners, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the date below at Delaware, Ohio.

Date: December 30, 2020



Brett Balsiger on behalf of
Petitioner, PARADISE FACTORY LLC

VERIFICATION

I, AVI KAHAN, am the Manager of THE VAN NUYS GROUP LLC, a Petitioner in this action. I have read the foregoing petition and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief and the allegations specific to the other petitioners, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the date below at Los Angeles, California.

Date: December 30, 2020



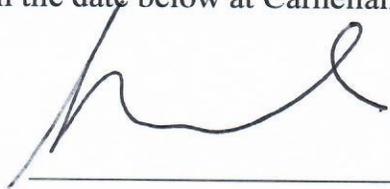
Avi Kahan on behalf of
Petitioner, THE VAN NUYS GROUP LLC

VERIFICATION

I, DREW KORNREICH, am the authorized signatory for CALIVA CADINH1, INC., a Petitioner in this action. I have read the foregoing petition and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief and the allegations specific to other petitioners, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the date below at Carmelian Bay, California.

Date: December 30, 2020



Drew Kornreich, on behalf of
Petitioner, CALIVA CADINH1, INC.

Ex. 1



The Green Easy <thevannuysgroup@gmail.com>

Record No. LA-C-19-001756-APP - 2021 License Renewal Period is Open

dcrlicensing@lacity.org <dcrlicensing@lacity.org>
To: thevannuysgroup@gmail.com

Wed, Sep 2, 2020 at 8:10 PM



Dear ,

You are receiving this email because you are listed as a contact on Record No. LA-C-19-001756-APP which has active 2020 commercial cannabis temporary licenses. The 2021 license renewal period is open from September 2, 2020 to November 2, 2020.

Beginning on September 15, 2020, Licensees may submit updated information associated with the 2021 renewal process, as well as submit modification requests to update business contacts, remove commercial cannabis activities, relocate, and make other license modifications in the Accela platform. A 2021 renewal invoice will be generated once a Licensee submits all requested information associated with the renewal process and any modification requests through the Accela platform. Licensees that do not plan to make any changes to their record may request an invoice before September 15, 2020, by emailing DCRLicensing@lacity.org.

The renewal fee is \$4,233 per Commercial Cannabis Activity. **All renewal fees must be paid on or before November 2, 2020, or your 2020 Temporary Approval(s) will expire after 11:59 p.m. on December 31, 2020.** (Los Angeles Municipal Code (LAMC) sec. 104.12(a).) All Licensees who allow their Temporary Approval(s) to expire will be required to cease operations and will not be allowed to engage in Commercial Cannabis Activity until a new application is submitted to DCR and a new Temporary Approval or License is issued.

Payments by check, money order and credit card can be made at any open Office of Finance location. Please note that the Office of Finance has limited hours and requires an appointment for cash payments over \$1,000. Cash payment appointment requests may be via email to finance.csd.appt@lacity.org. **Renewal fees are non-refundable.**

You must pay these renewal fees regardless of whether you also have outstanding tax payment(s) due to the Office of Finance; your payment will not be denied or rejected by the Office of Finance due to outstanding tax payment(s). Once your renewal fee is paid and your documents are submitted, DCR will review your renewal application. Payment of the renewal fee does not guarantee renewal.

Under LAMC Section 104.12(c), in order to receive a License renewal, a Licensee shall be in good standing with the requirements of LAMC and shall not be delinquent on any City tax or fee. A Licensee who has entered into a payment plan with the City's Office of Finance pursuant to LAMC Section 21.18 to pay all outstanding City-owed business taxes shall not be deemed delinquent on any city tax.

Please email DCRLicensing@lacity.org with any questions.

Kind regards,

Department of Cannabis Regulation



The Green Easy <thevannuysgroup@gmail.com>

Record No. LA-C-19-001756-APP - 2021 Renewal Application

3 messages

dcrlicensing@lacity.org <dcrlicensing@lacity.org>
To: thevannuysgroup@gmail.com

Wed, Sep 16, 2020 at 8:03 PM



Dear ,

You are receiving this email because you are listed as a contact on Record No. LA-C-19-001756-APP which has active 2020 commercial cannabis temporary licenses. The 2021 license renewal period opened on September 2, 2020. Earlier today, DCR updated the record status for Record No. LA-C-19-001756-APP from "Temporarily Approved" to "Eligible for Renewal".

At this time, Licensees may submit updated information associated with the 2021 renewal process, as well as submit initial modification requests to update business contacts, remove commercial cannabis activities, relocate, and make certain other license modifications in the Accela platform. A 2021 renewal invoice will be generated once a Licensee submits all requested information associated with the renewal process and any modification requests through the [DCR Licensing portal](#).

Please review the following materials before beginning a 2021 Renewal Application:

[Video Tutorial - How to Complete a 2021 Renewal Application](#)

[Video Tutorial - How to Look-Up an Accela Citizen Access \(ACA\) Reference ID No.](#)

[Contact Types for ACA Records Worksheet](#)

[Application Modification Request - Cover Page](#)

The renewal fee is \$4,233 per Commercial Cannabis Activity. **All renewal fees must be paid on or before November 2, 2020, or your 2020 Temporary Approval(s) will expire after 11:59 p.m. on December 31, 2020.** (Los Angeles Municipal Code (LAMC) sec. 104.12(a).) All Licensees who allow their Temporary Approval(s) to expire will be required to cease operations

and will not be allowed to engage in Commercial Cannabis Activity until a new application is submitted to DCR and a new Temporary Approval or License is issued.

Payments by check, money order and credit card can be made at any open Office of Finance location. Please note that the Office of Finance has limited hours and requires an appointment for cash payments over \$1,000. Cash payment appointment requests may be via email to finance.csd.appt@lacity.org. **Renewal fees are non-refundable.**

You must pay these renewal fees regardless of whether you also have outstanding tax payment(s) due to the Office of Finance; your payment will not be denied or rejected by the Office of Finance due to outstanding tax payment(s). Once your renewal fee is paid and your documents are submitted, DCR will review your renewal application. Payment of the renewal fee does not guarantee renewal. Under LAMC Section 104.12(c), in order to receive a License renewal, a Licensee shall be in good standing with the requirements of LAMC and shall not be delinquent on any City tax or fee. A Licensee who has entered into a payment plan with the City's Office of Finance pursuant to LAMC Section 21.18 to pay all outstanding City-owned business taxes shall not be deemed delinquent on any city tax.

Please email DCRLicensing@lacity.org with any questions.

Kind regards,

Department of Cannabis Regulation

dcrlicensing@lacity.org <dcrlicensing@lacity.org>
To: thevannuysgroup@gmail.com

Wed, Sep 16, 2020 at 8:03 PM



Dear Naomi Kahan,

[Quoted text hidden]

dcrlicensing@lacity.org <dcrlicensing@lacity.org>
To: thevannuysgroup@gmail.com

Wed, Sep 16, 2020 at 8:03 PM

[Quoted text hidden]



Dear Brett Balsiger,

You are receiving this email because you are listed as a contact on Record No. LA-C-18-000301-APP which has active 2020 commercial cannabis temporary licenses. The 2021 license renewal period opened on September 2, 2020. Earlier today, DCR updated the record status for Record No. LA-C-18-000301-APP from “Temporarily Approved” to “Eligible for Renewal”.

At this time, Licensees may submit updated information associated with the 2021 renewal process, as well as submit initial modification requests to update business contacts, remove commercial cannabis activities, relocate, and make certain other license modifications in the Accela platform. A 2021 renewal invoice will be generated once a Licensee submits all requested information associated with the renewal process and any modification requests through the [DCR Licensing portal](#).

Please review the following materials before beginning a 2021 Renewal Application:

[Video Tutorial - How to Complete a 2021 Renewal Application](#)

[Video Tutorial - How to Look-Up an Accela Citizen Access \(ACA\) Reference ID No.](#)

[Contact Types for ACA Records Worksheet](#)

[Application Modification Request - Cover Page](#)

The renewal fee is \$4,233 per Commercial Cannabis Activity. **All renewal fees must be paid on or before November 2, 2020, or your 2020 Temporary Approval(s) will expire after 11:59 p.m. on December 31, 2020.** (Los Angeles Municipal Code (LAMC) sec. 104.12(a).) All Licensees who allow their Temporary Approval(s) to expire will be required to cease operations and will not be allowed to engage in Commercial Cannabis Activity until a new application is submitted to DCR and a new Temporary Approval or License is issued.

Payments by check, money order and credit card can be made at any open Office of Finance location. Please note that the Office of Finance has limited hours and requires an appointment for cash payments over \$1,000. Cash payment appointment requests may be via email to finance.csd.appt@lacity.org. **Renewal fees are non-refundable.**

You must pay these renewal fees regardless of whether you also have outstanding tax payment(s) due to the Office of Finance; your payment will not be denied or rejected by the Office of Finance due to outstanding tax payment(s). Once your renewal fee is paid and your documents are submitted, DCR will review your renewal application. Payment of the renewal fee does not guarantee renewal. Under LAMC Section 104.12(c), in order to receive a License renewal, a Licensee shall be in good standing with the requirements of LAMC and shall not be delinquent on any City tax or fee. A Licensee who has entered into a payment plan with the City's Office of Finance pursuant to LAMC Section 21.18 to pay all outstanding City-owed business taxes shall not be deemed delinquent on any city tax.

Please email DCRLicensing@lacity.org with any questions.

Kind regards,

Ex. 2



The Green Easy <thevannuysgroup@gmail.com>

2021 Renewal Invoice - LA-C-19-001756-APP

1 message

DCR Licensing <dcrlicensing@lacity.org>

Sun, Oct 11, 2020 at 11:43 AM

To: avi@theartisttree.com, TheVanNuysGroup Group <thevannuysgroup@gmail.com>

Dear Applicant,

Your 2021 Renewal Invoice has been generated. As a courtesy, we've attached a copy of the Invoice to this email. You may also access the invoice by logging into your Accela account and viewing the document under the "My Records" tab. *Please print* and remit payment with the Office of Finance. Payment for 2021 Renewal Fees are due by **Monday, November 2, 2020**.

If you have any additional questions or concerns, please feel free to contact DCR at DCRLicensing@lacity.org.

Kind regards,



CITY OF LOS ANGELES DEPARTMENT OF
**CANNABIS
REGULATION**

Licensing Team
Department of Cannabis Regulation
City of Los Angeles
213-978-0738

**LA-C-19-001756-APP.pdf**

127K

Your 2021 Renewal Invoice has been generated. As a courtesy, we've attached a copy of the Invoice to this email. You may also access the invoice by logging into your Accela account and viewing the document under the "My Records" tab. *Please print* and remit payment with the Office of Finance. Payment for 2021 Renewal Fees are due by **Monday, November 2, 2020.**

If you have any additional questions or concerns, please feel free to contact DCR at DCRLicensing@lacity.org.

Kind regards,



Licensing Team
Department of Cannabis Regulation
[City of Los Angeles](#)
213-978-0738

Ex. 3

Office of Finance
P.O. Box 53233
Los Angeles CA 90053-0233

CITY OF LOS ANGELES
CALIFORNIA



Eric Garcetti
Mayor

Diana Mangioglu
Director of Finance
City Treasurer

11/30/2020

TAXPAYER'S PAYMENT RECEIPT

Payment Date	Payment Type	Card Issuer	Card Number	Payment Amount	Seq. #	Batch Item ID
11/02/2020	Check		0	\$ 12,699.00	2	15283956

cc# 088561587

Seq. #	Document Type	Account Number	Legal Name	Fund/Class Code	Tax Period	Measure	Other Identifier	Applied Amount
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J074	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J064	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J209	202100A			4,233.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J207	202100A			4,233.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J080	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J083	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J093	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J090	202100A	0		0.00
2	Renewal	0003073895-0001-0	PARADISE FACTORY LLC	J204	202100A			4,233.00

10/11/2020 - 6:13 PM



CITY OF LOS ANGELES DEPARTMENT OF
**CANNABIS
REGULATION**

221 N. Figueroa Street, Suite 1245
Los Angeles CA, 90012

2021 TEMPORARY APPROVAL RENEWAL INVOICE

Invoice Date:	Wednesday, September 2, 2020	BTRC#:	0003073895-0001-0
Amount Due:	\$12,699.00	Legal Business Name:	Paradise Factory, LLC
Void if not Paid by:	Monday, November 2, 2020	Doing Business As:	
Record Number:	LA-C-18-000301-APP	Premises Address:	385 W 20TH ST, SAN PEDRO, CA 90731

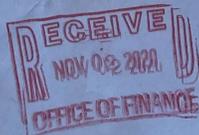
Medical Cannabis Activities:	Adult-Use Cannabis Activities:
Medical Cultivation Small Indoor (J064)	
Medical Distributor (J080)	
Medical Manufacturer Level 1 (J083)	

Inv Id:	Fee Details	Fee Code	Fee Amount
4019	Cannabis Distributor Payment (TA-P2) 2021 Renewal	J204R21	4,233.00
4019	Cannabis Cultivation Small Indoor Payment (TA-P2) 2021 Renewal	J207R21	4,233.00
4019	Cannabis Manufacturer Level 1 Payment (TA-P2) 2021 Renewal	J209R21	4,233.00

- This invoice is only valid until **Monday, November 2, 2020**.
- Payments by check, money order and credit card can be made at any open Office of Finance location. **Mailed payments will not be accepted.**
- Please note that the Office of Finance has limited hours and requires an appointment for cash payments over \$1,000. An appointment to remit payment in person at the City Hall public counter must be requested via email (finance.csd.appt@lacity.org) by **Friday, October 16, 2020**. Failure to make an appointment does not relieve the Licensee from ensuring payment is made on or before **Monday, November 2, 2020**. **Renewal fees are non-refundable.**
- If no action is taken on or before **Monday, November 2, 2020**, your **2021 Temporary Approval documents will not be issued**. Your **2020 Temporary Approval documents** expire after **11:59PM on December 31, 2020** and you must cease all **Commercial Cannabis Activity** after that date if **2021 Temporary Approval documents** are not be issued.
- The **2021 license renewal period** is open until **November 2, 2020**. Payment of the renewal fee does not guarantee renewal. Under Los Angeles Municipal Code (LAMC) Sec. 104.12(c), in order to receive a License renewal, a Licensee shall be in good standing with the requirements of LAMC and shall not be delinquent on any City tax or fee. A Licensee who has entered into a payment plan with the City's Office of Finance pursuant to LAMC Section 21.18 to pay all outstanding City-owed business taxes shall not be deemed delinquent on any City tax.

Please remit this invoice with payment, Thank you.

Please Make Payment To:
City of Los Angeles
Office of Finance
 Van Nuys Civic Center Branch
 6262 Van Nuys Boulevard, #110
 Van Nuys, CA 91401



908-313-0981
 Brett Balsiger

Ex. 4

Office of Finance
P.O. Box 53233
Los Angeles CA 90053-0233

CITY OF LOS ANGELES
CALIFORNIA

Diana Mangioglu
Director of Finance
City Treasurer



Eric Garcetti
Mayor

10/13/2020

TAXPAYER'S PAYMENT RECEIPT

Payment Date	Payment Type	Card Issuer	Card Number	Payment Amount	Seq. #	Batch Item ID
10/13/2020	Check		0	\$ 4,233.00	1	15166550

Seq. #	Document Type	Account Number	Legal Name	Fund/Class Code	Tax Period	Measure	Other Identifier	Applied Amount
1	Renewal	0002274496-0001-5	THE VAN NUYS GROUP LLC	J001	202100A			\$ 4,233.00

Ex. 5

Office of Finance
P.O. Box 53233
Los Angeles CA 90053-0233

CITY OF LOS ANGELES
CALIFORNIA

Diana Mangioglu
Director of Finance
City Treasurer



Eric Garcetti
Mayor

10/28/2020

TAXPAYER'S PAYMENT RECEIPT

Payment Date	Payment Type	Card Issuer	Card Number	Payment Amount	Seq. #	Batch Item ID
10/28/2020	Credit Card	VIS	6384	\$ 4,233.00	1	15184195

Seq. #	Document Type	Account Number	Legal Name	Fund/Class Code	Tax Period	Measure	Other Identifier	Applied Amount
1	Renewal	0003067479-0001-1	ASCELPIUS INCORPORATED	J090	202100A			0.00
1	Renewal	0003067479-0001-1	ASCELPIUS INCORPORATED	J204	202100A			4,233.00
1	Renewal	0003067479-0001-1	ASCELPIUS INCORPORATED	J080	202100A			0.00

\$4,233⁰⁰ Renewal | Paid \$4,347²⁹
\$ 114²⁹ Process Fee

Ex. 6



The Green Easy <thevannuysgroup@gmail.com>

Notice of Expiring 2020 License(s) - LA-C-19-001756-APP

1 message

dcrlicensing@lacity.org <dcrlicensing@lacity.org>

Tue, Dec 8, 2020 at 3:12 PM

To: thevannuysgroup@gmail.com



Greetings ,

The annual License renewal filing period closed after 11:59 p.m. on Monday, November 2, 2020. Our records indicate that a 2021 License renewal application and/or pay the applicable 2021 License renewal fees by the deadline.

If the business associated with LA-C-19-001756-APP submitted a 2021 License renewal application and paid the applicable 2021 License renewal fees by the deadline, please email copies of the renewal record number and the payment receipt by Friday, December 18, 2020. The email should be addressed to DCRLicensing@lacity.org with the subject line, "Proof of 2021 License Renewal."

All Licenses that were not timely renewed shall **expire after 11:59 p.m. on December 31, 2020**, in accordance with Los Angeles Municipal Code (LAMC) Section 104.12(a). The determination that a License has expired is final and not reviewable by an administrative appeal. All Persons with expired Licenses shall cease all Commercial Cannabis Activity after 11:59 p.m. on December 31, 2020, until such time that the Person is issued a new License from DCR and a license from the State of California.

Please be advised that any Persons who have allowed their Temporary Approval(s) to expire and who continue to engage in Commercial Cannabis Activity are subject to an enforcement action and/or criminal penalties for unlicensed Commercial Cannabis Activity. (LAMC Sec. 104.15.)

Kind regards,

Department of Cannabis Regulation

Greetings ,

The annual License renewal filing period closed after 11:59 p.m. on Monday, November 2, 2020. Our records indicate that a 2021 License renewal application and/or pay the applicable 2021 License renewal fees by the deadline.

If the business associated with LA-C-18-000301-APP submitted a 2021 License renewal application and paid the applicable 2021 License renewal fees by the deadline, please email copies of the renewal record number and the payment receipt by Friday, December 18, 2020. The email should be addressed to DCRLicensing@lacity.org with the subject line, "Proof of 2021 License Renewal."

All Licenses that were not timely renewed shall **expire after 11:59 p.m. on December 31, 2020**, in accordance with Los Angeles Municipal Code (LAMC) Section 104.12(a). The determination that a License has expired is final and not reviewable by an administrative appeal. All Persons with expired Licenses shall cease all Commercial Cannabis Activity after 11:59 p.m. on December 31, 2020, until such time that the Person is issued a new License from DCR and a license from the State of California.

Please be advised that any Persons who have allowed their Temporary Approval(s) to expire and who continue to engage in Commercial Cannabis Activity are subject to an enforcement action and/or criminal penalties for unlicensed Commercial Cannabis Activity. (LAMC Sec. 104.15.)

Kind regards,

Department of Cannabis Regulation

Ex. 7

MOTION

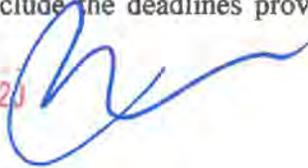
The Department of Cannabis Regulation (DCR) relies on the Office of Finance (Finance) to provide cashiering services for all of DCR's commercial cannabis customers. Finance has made numerous operational changes due to the ongoing COVID-19 Pandemic, as well as related safety and social distancing protocols. These operational changes have led to the temporary closure of Finance's West Los Angeles Office as of April 2020, limiting days of operation in Finance's Van Nuys Office as of October 2020, and the closure of services at the City Hall Office from April through July 2020, which is now available by appointment only. Finance has indicated that they have experienced overcrowding and challenges to processing 2021 renewal payments of commercial cannabis licenses prior to the November 2, 2020 deadline.

Recently, it was determined that certain Finance staff dedicated to processing cannabis payments have tested positive for COVID-19 in December 2020. Subsequently, staff was required to quarantine, thus reducing or eliminating Finance's capacity for processing commercial cannabis renewal payments at multiple locations. Finance has indicated that these impacts may last beyond December 2020. Furthermore, it is possible that additional Finance staff may have been exposed to COVID-19 and will be required quarantine in the future.

For most types of cannabis related fees, the Los Angeles Municipal Code (LAMC) requires payment within 10 days of the issuance of an invoice, with no grace period or opportunity for late payment. Additionally, commercial cannabis license renewal fees must be paid no later than 60 calendar days before the expiration of the License, with no grace period or opportunity for late payment. Finance's operational changes and limited staffing have reduced the ability of commercial cannabis applicants and licensees to provide timely payment of DCR's licensing fees. The DCR has indicated that the implementation of extended payment windows and the addition of late fees will alleviate administrative burdens on Finance, provide more time for cannabis customers to pay fees, and allow DCR to recuperate costs associated with processing licensing and renewal matters on a late and, therefore, expedited basis.

Amending LAMC Section 104.12 to allow commercial cannabis applicants and licensees to make late renewal fee payments upon the payment of a late fee would prevent 57 commercial cannabis businesses (15% of the licensed commercial cannabis businesses in the City) from going out of business in January 2021. For example, if an applicant has two Temporary Approvals that expire on December 31, 2020, that applicant could be permitted to renew both of their Temporary Approvals after November 2, 2020, subject to payment of the two renewal fees in the amount of \$8,466 (\$4,233 per Temporary Approval), plus a flat 50% late fee of \$4,233. Additionally, if an applicant had two Temporary Approvals that expired on December 31, 2020, that applicant could be permitted to renew both of their Temporary Approvals between January 1, 2021, and February 28, 2021, subject to the payment of the two renewal fees in the amount of \$8,466 (\$4,233 per Temporary Approval), plus a flat 100% late fee of \$8,466, but must cease all commercial cannabis activities on January 1, 2021, until their Temporary Approvals are renewed.

Many payment deadlines listed in Article 4 of Chapter X of the LAMC are required to be made within 10 days of the date of invoice issuance. Providing additional time to pay will allow DCR and other Departments to navigate operational changes associated with COVID-19, furloughs, and other changes. Providing 30 days from the date of invoice issuance should allow sufficient time. These changes should include the deadlines provided in LAMC Sections 104.03(a), 104.03(a)(4),

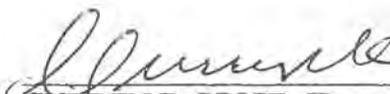


104.03(b), 104.03(c), 104.03(e)(3), 104.06.1(b)(8), 104.06.1(c)(1), 104.06.1(c)(7), 104.06.1(d)(6), 104.06.1(e)(4), and 104.06.1(f)(3).

I THEREFORE MOVE that the City Council request the City Attorney, with the assistance of the Department of Cannabis Regulation, to prepare and present an ordinance that addresses the City's ongoing fiscal crisis and the Office of Finance's operational changes, by allowing commercial cannabis licensees to provide late payments of renewal fees according to the following provisions:

1. Allow commercial cannabis applicants and licensees to make late renewal fee payments before the expiration of the License or Temporary Approval. Late renewal payments shall include a flat 50% late fee, and shall be due by February 28, 2021;
2. Allow commercial cannabis applicants and licensees to pay their renewal fees after the expiration date of the License or Temporary Approval. Late payments of expired licenses shall include a flat 100% late fee, and shall be due by February 28, 2021. All applicants and licensees with an expired License or Temporary Approval must cease all cannabis activity until a new License or Temporary Approval is issued;
3. Amend all payment deadlines that are required to be made within 10 days of the date of invoice issuance to 30 days of the date of invoice issuance;
4. Consider all payments timely paid if enclosed in a properly addressed envelope with sufficient postage, deposited in the mail, and postmarked by the payment deadline.
5. Consider all payments timely paid if an applicant or licensee schedules and confirms an appointment with the Office of Finance by the date of the payment deadline, notwithstanding that the appointment may be after the date of the payment deadline;
6. All proposed amendments shall apply to 2020 and 2021 renewal fees and all other fees due after January 1, 2021;
7. No amendments proposed here shall be construed to extend the time to pay fees, which have a payment deadline longer than 10 days, except that those payments may be made by mail; and
8. A sunset clause provision that will cease the operation of the amendments proposed herein when the State of California and City of Los Angeles have lifted the declared State of Emergency due to the novel COVID-19 virus pandemic.

PRESENTED BY:


CURREN D. PRICE, JR.
Councilmember, 9th District

SECONDED BY:


MARQUEECE HARRIS-DAWSON
Councilmember, 8th District

ORIGINAL

Ex. 8

From: DCRLicensing@lacity.org
Date: December 22, 2020 at 2:21:49 PM PST
To: danielstonebreakercurtis@gmail.com
Subject: Expiring 2020 Licenses - LA-C-18-000039-APP



LA-C-18-000039-APP

Greetings Daniel Curtis,

Due to Office of Finance closures and related operational impacts resulting from the ongoing COVID-19 pandemic, members of the Los Angeles City Council introduced a motion, on December 9, 2020, to amend Los Angeles Municipal Code (LAMC) Section 104.12, among other sections, that would extend license renewal applications for 2020 renewals, and 2021 renewals that would otherwise expire after 11:59 P.M. on December 31, 2020.

In light of this COVID-19 related motion and its intention to address the, up to, 57 Applicants/Licensees that would be impacted in its absence, DCR will not proactively report the expired status of any licenses to the Los Angeles Police Department (LAPD) or State agencies, or participate in an enforcement action related to the expiration of the license against any Applicants/Licensees until March 1, 2020.

This decision shall in no way constitute a waiver of the DCR's responsibility or right to take any other action under the LAMC, Rules and Regulations, or any other law, and does not preclude another City or State agency from taking independent action. DCR reserves the right to enforce operational violations under DCR's Rules and Regulations or LAMC 104.00 et seq.

Kind regards,

Department of Cannabis Regulation

----- Forwarded message -----

From: dcrlicensing@lacity.org <dcrlicensing@lacity.org>

Date: Tue, Dec 22, 2020 at 2:21 PM

Subject: Expiring 2020 Licenses - LA-C-18-000301-APP

To: <brettbalsiger@gmail.com>



LA-C-18-000301-APP

Greetings ,

Due to Office of Finance closures and related operational impacts resulting from the ongoing COVID-19 pandemic, members of the Los Angeles City Council introduced a motion, on December 9, 2020, to amend Los Angeles Municipal Code (LAMC) Section 104.12, among other sections, that would extend license renewal applications for 2020 renewals, and 2021 renewals that would otherwise expire after 11:59 P.M. on December 31, 2020.

In light of this COVID-19 related motion and its intention to address the, up to, 57 Applicants/Licensees that would be impacted in its absence, DCR will not proactively report the expired status of any licenses to the Los Angeles Police Department (LAPD) or State agencies, or participate in an enforcement action related to the expiration of the license against any Applicants/Licensees until March 1, 2020.

This decision shall in no way constitute a waiver of the DCR's responsibility or right to take any other action under the LAMC, Rules and Regulations, or any other law, and does not preclude another City

or State agency from taking independent action. DCR reserves the right to enforce operational violations under DCR's Rules and Regulations or LAMC 104.00 et seq.

Kind regards,

Department of Cannabis Regulation

----- Forwarded message -----

From: dcrlicensing@lacity.org <dcrlicensing@lacity.org>

Date: Tue, Dec 22, 2020 at 2:21 PM

Subject: Expiring 2020 Licenses - LA-C-19-001756-APP

To: <avi@theartisttree.com>



LA-C-19-001756-APP

Greetings Naomi Kahan,

Due to Office of Finance closures and related operational impacts resulting from the ongoing COVID-19 pandemic, members of the Los Angeles City Council introduced a motion, on December 9, 2020, to amend Los Angeles Municipal Code (LAMC) Section 104.12, among other sections, that would extend license renewal applications for 2020 renewals, and 2021 renewals that would otherwise expire after 11:59 P.M. on December 31, 2020.

In light of this COVID-19 related motion and its intention to address the, up to, 57 Applicants/Licensees that would be impacted in its absence, DCR will not proactively report the expired status of any licenses to the Los Angeles Police Department (LAPD) or State agencies, or participate in an enforcement action related to the expiration of the license against any Applicants/Licensees until March 1, 2020.

This decision shall in no way constitute a waiver of the DCR's responsibility or right to take any other action under the LAMC, Rules and Regulations, or any other law, and does not preclude another City or State agency from taking independent action. DCR reserves the right to enforce operational violations under DCR's Rules and Regulations or LAMC 104.00 et seq.

Kind regards,

Department of Cannabis Regulation

--



Avi Kahan
Founder
The Artist Tree
direct: 310.922.3502
email: avi@theartisttree.com
website: www.theartisttree.com

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion.

Ex. 9

The message you received yesterday referred to a March 1, 2020 date. The intended date was March 1, 2021.

Due to Office of Finance closures and related operational impacts resulting from the ongoing COVID-19 pandemic, members of the Los Angeles City Council introduced a motion, on December 9, 2020, to amend Los Angeles Municipal Code (LAMC) Section 104.12, among other sections, that would extend license renewal applications for 2020 renewals, and 2021 renewals that would otherwise expire after 11:59 P.M. on December 31, 2020.

In light of this COVID-19 related motion and its intention to address the, up to, 57 Applicants/Licensees that would be impacted in its absence, DCR will not proactively report the expired status of any licenses to the Los Angeles Police Department (LAPD) or State agencies, or participate in an enforcement action related to the expiration of the license against any Applicants/Licensees until March 1, 2021.

This decision shall in no way constitute a waiver of the DCR's responsibility or right to take any other action under the LAMC, Rules and Regulations, or any other law, and does not preclude another City or State agency from taking independent action. DCR reserves the right to enforce operational violations under DCR's Rules and Regulations or LAMC 104.00 et seq.

Kind regards,

Department of Cannabis Regulation