

REGULAR SUBMISSIONS

CITY OF LOS ANGELES
CALIFORNIA



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WWW.DLANC.COM

EMAIL: DLANC@EMPOWERLA.ORG

April 9, 2024

Cannabis Regulation Commission,
Department of Cannabis Regulation
221 Figueroa Street, Suite 1245
Los Angeles, California 90012

VIA EMAIL

RE: **Case No:** LA-R-24-101775-ANN
Project Address: 735 South Broadway Avenue
Applicant: Advanced Patients' Collective.
Project Description: A letter of support for the issuance of an Annual Cannabis Retail license.

To Whom It May Concern:

At our regularly held public meeting on April 9, 2024, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to support the below request.

DLANC **supports** the Applicant's request for licensure in Case No. LA-R-24-101775-ANN. DLANC's support is conditioned on the Applicant agreeing to the following stipulations for the project.

In DLANC's view, the information presented provides adequate justification for granting the Applicant's requests. *Subject to the conditions set forth below* and any additional conditions recommended by the LAPD or Council District Office, DLANC encourages the Los Angeles Department of Cannabis Regulation to approve the Applicant's project.

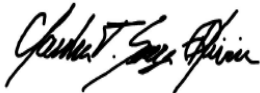
CONDITION 1: Storefronts of ground floor retail retain transparency at all times to allow for eyes on the street and pedestrian safety.

CONDITION 2: Owner/Operator will come back and present to DLANC PLUC should owner/operator change.

- CONDITION 3:** Any amplified or outdoor noise shall be mitigated such that it will remain in compliance with the LA Noise Ordinance.
- CONDITION 4:** Applicant shall develop a queuing/crowd management plan for the public right of way and will ensure any barricades, stanchions, or crowd management devices provide adequate ADA path of travel on the sidewalk.
- CONDITION 5:** Applicant provide additional security at the retail floor and building frontage .
- CONDITION 6:** Owner/Operator complies with all provisions of LAMC §104 (Ordinance No. 183,241) and other regulatory requirements of the City of Los Angeles.

If possible, please send a digital copy of your decision letter via e-mail to planning@dlanc.com in lieu of a hard copy. Thank you in advance for your consideration of the comments presented in this letter.

Sincerely,



Claudia Oliveira
President,
DLANC



Samir Bitar
Chair,
DLANC Planning & Landuse Committee

Cc:

Gerald Gubatan, Council District 14 (via email)
Det. Jorge Trejo, LAPD Central Division (via email)
Sgt. Gordon Helper, LAPD Central Division (via email)



LAUSD Comment Letter - 1705 S. Gaffey Street (We Roll Up)

'Fernandez, Bryan' via DCR Cannabis Commission <CannabisCommission@lacity.org>

Tue, May 7, 2024 at 4:01 PM

Reply-To: "Fernandez, Bryan" <cp-bryan.fernandez@lausd.net>

To: "cannabiscommission@lacity.org" <cannabiscommission@lacity.org>

Cc: "jason.killeen@lacity.org" <jason.killeen@lacity.org>, "dcrlicensing@lacity.org" <dcrlicensing@lacity.org>,

"maresja.bray@lacity.org" <maresja.bray@lacity.org>, "GODEK, GWENN (Contract Professional)"

<gwenn.godek@lausd.net>, "Donohoe, Colin" <cdonohoe@lausd.net>, "Aubele, Raymond" <raymond.aubele@lausd.net>

Dear Commissioners,

LA Unified School District received a Notice of Community Meeting and Public Hearing to permit a Type 10 - Retailer Storefront Commercial Cannabis Activity at [1705 S. Gaffey Street](#) (#LA-R-24-310213-ANN). The business currently operates as We Roll Up and is located within 700 feet southeast of Dana Middle School and San Pedro High School.

We are providing the attached comments to be included in the community meeting and public hearing process for this application.

Sincerely,

Bryan Ramos Fernandez, AICP

[CEQA Project Manager](#)

Contract Professional

Los Angeles Unified School District (LAUSD)

Office of Environmental Health and Safety (OEHS)

[333 S Beaudry Ave.](#), 21st Floor, Los Angeles, CA 90017

O: (213) 241-4210

cp-bryan.fernandez@lausd.net

 **LAUSD Comment Letter - 1705 S Gaffey Street.pdf**
535K

**ALBERTO M.
CARVALHO**
Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

May 9, 2024

Sent via e-mail

Commissioners
City of Los Angeles, Department of Cannabis Regulations
221 N. Figueroa Street, Suite 145
Los Angeles, CA, 90012

SUBJECT: PROJECT LOCATION: 1705 S. Gaffey Street, San Pedro, CA
PROJECT DESCRIPTION: Type 10 – Commercial Cannabis Activity
CASE NUMBER: LA-R-24-310213-ANN

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding application no. LA-R-24-310213-ANN. Los Angeles Unified School District (District) received a Notice of Community Meeting and Public Hearing for this application for a Type 10 – Commercial Cannabis Activity located at 1705 S. Gaffey Street in San Pedro. The District disapproves of commercial cannabis sales near its schools. According to the state Department of Cannabis Control, there's been a licensed cannabis storefront (We Roll Up) at this location since 2021. The business premise of the cannabis commercial activity is located 625 feet southeast of two District schools: Dana Middle School (1,387 students) and San Pedro High School (2,489 students) with a combined enrollment of 3,876 students. The schools are “sensitive uses” and within 700 feet from the business premise of the cannabis commercial activity.

LAUSD is concerned that the close proximity of commercial cannabis activity, with a retail storefront located a block away from our schools, would expose students at Dana Middle School and San Pedro High School to harmful cannabis products. The District is requesting that the request to operate a commercial cannabis activity at this location be denied.

The District has concerns about cannabis dispensaries' ability to ensure safe surrounding environments for children and to consistently adhere to regulations that protect youth. A recent study published in JAMA Pediatrics¹ looked at 700 licensed cannabis dispensaries in California and found that many retail locations have inadequate screening processes, which allows minors to enter and view items that should be restricted to adults 21 and over.² In addition, the study found multiple issues with dispensaries:

- 35% of dispensaries had items that may appeal to teens and children inside retail areas,
- 12% of dispensaries checked IDs prior to entering premises,
- 85% of dispensaries offered promotions, first-time purchase discounts and weekly or daily deals,
- 22% were in violation of California’s free sample ban for takeaway items, and
- 16% of dispensaries violated on-site consumption bans.

¹ <https://healthpolicy.usc.edu/article/kids-and-cannabis-california-dispensaries-lack-adequate-screening-to-keep-out-minors-usc-ucsd-study-finds/>

² Shi Y, Pacula RL. Assessment of Recreational Cannabis Dispensaries’ Compliance With Underage Access and Marketing Restrictions in California. *JAMA Pediatr.* 2021;175(11):1178–1180.

We Roll Up's website shows products that appeal to children including eight "gummies" and "terp chews" products (see Attachment).³ Edibles such as the ones being offered by the applicant are particularly concerning in light of recent news reports of LA Unified students at Sun Valley Magnet School⁴ and Van Nuys Middle School⁵ experiencing health emergencies as a consequence of ingesting cannabis-infused edibles. From 2016-2022, marijuana-related calls to California Poison Control System (CPCS) sharply increased for children (aged <6 years) by 445%, and for adolescents (aged 6-19 years) by 151%. Legalization of marijuana retail sales in 2018 may have increased the potential for exposure to marijuana among younger individuals, who are likely to mistake marijuana edibles for normal candy and consume an entire package.⁶

Declining to approve application no. LA-R-24-310213-ANN to renew its license is consistent with LAMC Section 105.00 (Purposes and Intent), which states,

"The purpose of this article is to stem the negative impacts and secondary effects associated with Cannabis related activities in the City, including, but not limited to, those documented in case law and in the legislative histories of cannabis regulations in the City, including but not limited to: neighborhood disruption and intimidation caused in part by increased transient visitors; exposure of school-age children and other residents sensitive to cannabis; cannabis sales to minors; and violent crimes."

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. Cannabis/marijuana's well-documented harmful effects on youth are exacerbated by allowing retail sales of such products next to schools.

Thank you for your attention to this matter. If you need additional information please contact me at (323) 241-4210.

Regards,

Bryan Ramos Fernandez

Bryan Ramos Fernandez, AICP

CEQA Project Manager

Los Angeles Unified School District (LAUSD)

Office of Environmental Health and Safety (OEHS)

333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017

Attachment: Exhibit A – We Roll Up product website screenshots

³ <https://werollup.com/shop/?menu?query=best%20selling>

⁴ <https://www.latimes.com/california/story/2023-03-15/7-children-treated-sun-valley-marijuana-gummies>

⁵ <https://abc7.com/van-nuys-middle-school-medical-emergency-possible-overdoses/12515261/>

⁶ <http://publichealth.lacounty.gov/sapc/MDU/MDBrief/MarijuanaBrief.pdf#:~:text=Rates%20of%20marijuana%20use%20among%20youth%20aged%2012-17,used%20marijuana%20in%20the%20past%20year%20in%20LAC.>













We Roll Up products (1/2)

We Roll Up.[™]

PRODUCTS

LOCATION PRODUCTS - APPAREL EDUCATION - ABOUT DAILY DEALS CONTACT

ORDER NOW

<p>Sativa</p> <p>Happy Daze Aliswell Flower (3.5g) THC 27.19% THCa 30.73%</p> <p style="text-align: right;">\$14.00 \$3.5g</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Hybrid</p> <p>Purple Push Pop We Roll Up Flower (3.5g) THCa 34.16%</p> <p style="text-align: right;">\$25.00 \$3.5g</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	
<p>Hybrid</p> <p>Peanut Butter Breath Glass House Farms Flower (3.5g) THC 34.74% THCa 35.39%</p> <p style="text-align: right;">\$27.00 \$3.5g</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Sour Watermelon - Single (100mg) Froot Gummies (EACH) 100mg 1pk</p> <p style="text-align: right;">\$9.99 \$8.10</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	
<p>Indica</p> <p>Forbidden Fruit (20pk) (100mg) AbsoluteExtracts Terp Chews (EACH) 100mg 20pk</p> <p style="text-align: right;">\$14.99 \$12.60</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Sour Blue Razz (1pk) (100mg) Froot Single Gummy (EACH) 100mg 1pk</p> <p style="text-align: right;">\$9.99 \$8.10</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	
<p>Wild Raspberry (100mg) STIDES High Tea (EACH) 100mg</p> <p style="text-align: right;">\$7.99 \$7.19</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Maui Mango (100mg) STIDES High Tea (EACH) 100mg</p> <p style="text-align: right;">\$7.99 \$7.19</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	
<p>High Punch (100mg) STIDES High Tea (EACH) 100mg</p> <p style="text-align: right;">\$7.99 \$7.19</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Indica</p> <p>OG Kush STILIZY STILIZY Pod (.5g) THC 91.07% CBD 0.23% THCa 0.45%</p> <p style="text-align: right;">\$23.00 .5g</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	
<p>Sativa</p> <p>Mosh Pit (1g) Big Tree 5 Pack-Pre... (1g/.5g per ...) THCa 29.68%</p> <p style="text-align: right;">\$18.00</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>		<p>Sour Grape Ape (1pk) (100mg) Froot Single Gummy (EACH) 100mg 1pk</p> <p style="text-align: right;">\$9.99 \$8.10</p> <p style="text-align: center; font-size: 8px;">Add to bag</p>	

We Roll Up products (2/2)

WeRollUp.™		LOCATION	PRODUCTS	APPAREL	EDUCATION	ABOUT	DAILY DEALS	CONTACT	ORDER NOW		
<p>Sativa Tangle [20pk] (100mg) AbsoluteExtracts ★★★★★ 11 Terp Chews (EACH) 100mg</p> <p>\$14.99 \$12.60</p> <p>Add to bag</p>	<p>Maui Wowie [20pk] (100mg) AbsoluteExtracts ★★★★★ 16 Terp Chews (EACH) 100mg</p> <p>\$14.99 \$12.60</p> <p>Add to bag</p>	<p>Hybrid Strawana STILLZY ★★★★★ 193 STILLZY Pod (.5g, 1g) THC 90.08% CBD 0.17% THCa 0.09%</p> <p>\$23.00/.5g</p> <p>Select weight</p>	<p>Hybrid Huckleberry Hybrid Enhanced Gummies 1... WILD ★★★★★ 702 Gummies (EACH) 100mg 10pk</p> <p>\$18.99 \$16.20</p> <p>Add to bag</p>	<p>Sativa Alpine Splash (100mg) Not Your Father's Soda (EACH) 100mg</p> <p>\$19.99 \$9.00</p> <p>Add to bag</p>	<p>Sativa 'Exche' Wild Cherry [20pk] (100mg THC) Camino ★★★★★ 479 Gummies (EACH) 100mg 20pk</p> <p>\$33.99 \$20.70</p> <p>Add to bag</p>	<p>Root Beer (100mg) Not Your Father's Soda (EACH) 100mg</p> <p>\$10.99 \$9.00</p>	<p>Georgia Peach (100mg) STIDES ★★★★★ 16 High Tea (EACH) 100mg</p> <p>\$7.99 \$7.19</p>	<p>Hybrid Nova Madness Raw Garden™ Refined Live Resin™ T... THC 92.99% CBD 0.32%</p> <p>\$36.00/1g</p>	<p>Guava (10mg) Palst Blue Ribbon Seltzer (EACH) 10mg</p> <p>\$6.99 \$5.40</p>	<p>Hybrid Strawberry Haze [20pk] (100mg) AbsoluteExtracts ★★★★★ 27 Terp Chews (EACH) 100mg 20pk</p> <p>\$14.99 \$12.60</p>	<p>Passion Fruit Pineapple [4pk] (40mg) Palst Blue Ribbon Seltzer (EACH) 40mg 4pk</p> <p>\$29.99 \$18.00</p>



Peace of Green, Inc. Memorandum in Support of Annual Application (LA-R-24-100609-ANN)

Latasha Bonaparte <lbonaparte@enso.law>
To: "CannabisCommission@lacity.org" <cannabiscommission@lacity.org>
Cc: Licensing <licensing@enso.law>

Thu, May 9, 2024 at 1:32 PM

Hi Cannabis Commission,

Attached please find a memorandum in support of Peace of Green, Inc.'s ("POG"), LA-R-24-100609-ANN, for POG'S commission hearing next Thursday, May 16th. Please let us know if any questions/issues. We will submit the authorization letter before the 14th.

Thank you so much and have a great afternoon!

Best,

Latasha



Latasha Bonaparte

Licensing

Phone 213-314-0028 Mobile 213-374-0374

Web www.enso.law Email lbonaparte@enso.law

600 Wilshire Blvd, Suite 890, Los Angeles, CA 90017



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 2024-05-09 Peace of Green Annual License Memorandum.pdf

153K

To: City of Los Angeles (“City”) Cannabis Regulation Commission (“Commission”)
From: Efren Gonzalez and PEACE OF GREEN, INC.
Date: May 16, 2024
Re: PEACE OF GREEN, INC Annual Dispensary License (LA-R-24-100609-ANN)

MEMORANDUM IN SUPPORT OF APPLICATION

PEACE OF GREEN, INC (“POG”) submits this Memorandum in support of its annual dispensary license (LA-R-24-100609-ANN) with the Department of Cannabis Regulations (“DCR”). POG is a Phase 1 pre-ICO with City and state licenses for retail dispensary, cultivation, manufacturing, and distribution operations¹ operating at its current location, 1155 E Pico Blvd Los Angeles, CA 90021 (“Licensed Premises”), in the heart of Los Angeles since 2014.

1) POG has Responsibly Served its Community for the Past Nine Years.

As an Existing Medical Marijuana Dispensary (“EMMD”) in LA, POG has successfully provided safe, tested cannabis to its patients and clients over the past 9 years. POG focuses on its patients and clients and has developed meaningful relationships with them to provide them safe and effective medicinal and recreational cannabis. POG has worked hard to get all of its licenses issued and maintain compliance with the state and City of LA, first in compliance with Proposition D then through all the iterations of the DCR’s amendments to the Los Angeles Municipal Code, the California Medicinal and Adult Use Cannabis Regulations and Safety Act (“MAUCRSA”) and Department of Cannabis Control (“DCC”)’s regulations.

During its 9 years of operation, POG has not received a single complaint about its operations or facilities from the City and prides itself on being part of the local community. For example, POG serves approximately 150 medicinal patients per month seeking relief from various health issues, such as providing relief of nausea and insomnia related to cancer treatments and epilepsy.

In addition, POG has cooperated with the Los Angeles Police Department (“LAPD”) multiple times by allowing LAPD to review its cameras. POG keeps its facility and the surrounding area clean and well-kept to enhance the quality of life in the neighborhood. It has proper indoor and outdoor lighting to keep the surrounding neighbors and its patients safe. POG has cameras on the inside and outside of the Licensed Premises to ensure safe operations, which security guards

¹ Please see Attachment A (State Unified License Search).

monitor closely during operating hours. The security guard also does an hourly perimeter check around the building. In addition, to ensure the safety of patients and customers, POG has ensured there is a safe walkway in the parking lot to the Licensed Premises so that everyone may feel safe. POG strictly prohibits loitering and consumption on or around the premises to avoid any nuisance issues in the neighborhood, notices of which are posted throughout the parking lot. Combined, these safety measures not only create a pleasant and safe experience for patrons, but also deters general crime in the surrounding neighborhood.

Over the years, POG has paid all of its licensing fees and compliance fees and taxes in a timely manner. As required, POG contacted its neighborhood council offering to speak with the council about its application as required but was not ultimately requested to do so. POG meets all of the criteria for issuance of an annual license under Los Angeles Municipal Code (“LAMC”) section 104.04.

2) None of the General Denial Reasons Apply to POG under LAMC 104.04(a).

POG’s Licensed Premises is substantially the same as that submitted to the DCR, including the size, layout, location of egress and egress, limited access areas and location of doorways/passageways. The DCR and DCC have always been allowed access to the Licensed Premises and provided with requested accurate, truthful information, forms, and documents in a timely manner, including annual renewals with the DCR and DCC and required CEQA information. POG is not aware of any complaint(s) issued against it and there is no history with or documentation from law enforcement that POG would create a significant public safety problem. POG’s temporary approval is in good standing, and it has passed its required City inspections. Finally, POG has never been denied a license, permit or other authorization to engage in commercial cannabis activity and has always adhered to the requirements of the LAMC and DCR regulations.

3) None of the Business Premises Denial Reasons Apply to VHC under LAMC 104.04(b).

The Licensed Premises meet all applicable requirements of LAMC 105.00, et. seq., including the limited grandfathering authorized for EMMDs in the City. POG is located in the Los Angeles community plan area, which has not reached undue concentration according to the DCR’s licensing map.² POG’s landlord, the owner of the Licensed Premises, does not hold office in any government agency related to commercial cannabis activity or otherwise. Furthermore, there have not been any convictions related to the Licensed Premises regarding any type of illegal and/or unlicensed commercial cannabis activity for the past seven (7) years that POG has occupied the facility, including no utility disconnections or padlocking of the Licensed Premises.

4) None of the Ownership Denial or Disqualification of Primary Personnel Reasons Apply to POG under LAMC 104.04(c) and (d).

² Please see Attachment B (DCR Licensing Map).

No owner of POG holds office in any government agency related to commercial cannabis activity or otherwise. There is no entity owner of POG, including a foreign entity incorporated outside of the United States. In addition, no owner or primary personnel of POG has been convicted of a crime involving cannabis, wage or labor violations, selling tobacco or alcohol to minors, a violent or serious felony or felony involving fraud, deceit or embezzlement or incurred a civil judgment regarding illegal commercial cannabis activity.

CONCLUSION

Based upon the foregoing, and based on the fact that no facts or reasons for denial under LAMC 104.04 exist, POG respectfully request the Commission approve the issuance of its annual city commercial cannabis dispensary license so that POG may continue to operate in its community it holds dear and move forward with its state renewals and City requirements.