

SECONDARY SUBMISSIONS

**LOS ANGELES DEPARTMENT OF CANNABIS REGULATION
CANNABIS REGULATION COMMISSION APPEAL HEARING**

SECONDARY SUBMISSION

Agenda Item No.: No. 11

Submitting Party:

Colorado Blvd Partners, LLC, a California Limited Liability Company dba Muha Meds

Submission Date:

September 25, 2025

Issue Description:

Appeal of Denial of Annual License Application (DCR Record No. LA-R-24-32-0031-ANN) concerning the retail storefront cannabis license for Colorado Blvd Partners, LLC, a

Social Equity Applicant.

DECLARATION OF MARY AMANDA WITHERSPOON

I, Mary Amanda Witherspoon, have personal knowledge of the following and hereby declare as follows:

1. I am the Social Equity Individual Applicant (“SEIA”) for Colorado Blvd Partners, LLC (“CBP”), doing business as Muha Meds, located at 1731 Colorado Boulevard, Los Angeles, California 90041.

2. CBP was formed and licensed under the City of Los Angeles’ Social Equity Program, which was established to promote equitable ownership and opportunities in the cannabis industry for those disproportionately impacted by the War on Drugs.

3. On or about August 17, 2023, CBP was granted Temporary Approval to operate as a storefront retailer under Los Angeles Department of Cannabis Regulation (“DCR”) Record No. LA-R-23-320031-ANN, with approval through December 31, 2023. A true and correct copy of the Temporary Approval renewal invoice is reflected in Exhibit 2.

4. On or about October 30, 2023, CBP submitted its renewal application for calendar year 2024. In connection with that renewal, CBP later paid its renewal invoices, including Invoice #15421 (2024 Temporary Approval Renewal) and Invoice #15420 (2024 Standard Inspection Fee). A true and correct copy of CBP’s payment receipts are attached as Exhibits 8–9.

5. These payments were accepted by the Los Angeles Office of Finance and were not returned.

6. I understand that Valeria Castelo is the current owner and holder of 49% of the outstanding and issued membership interests in CBP as set forth in that certain series of Equity Purchase Agreements dated February 14, 2024 between Valeria Castelo and some of CBP’s former members Jim Sullivan, Rachel Wilson, and Daniel Wise (the “Equity Purchase”). True and correct copies of the Equity Purchase Agreements are attached as Exhibits 3–5.

7. Concurrently with the Equity Purchase, I understand that Ms. Castelo entered into a Management Services Agreement (“MSA”) with CBP. Pursuant to the MSA, Ms. Castelo assumed a direct role in managing CBP’s operations.

1 8. The MSA and Ms. Castelo’s participation in CBP was critical to CBP’s success. I have
2 no operational know-how or business management capabilities. I have no capital to contribute to CBP.
3 I am not proficient with a computer and rarely utilize email. I am a traditional and simple person.

4 9. Prior to the Equity Purchase, I understand that CBP’s operational standards were poor,
5 its recurring cashflow was insufficient and without adequate reserves, and its tax payments were
6 defaulted.

7 10. I understand that Ms. Castelo invested in CBP’s operations, helped and directed CBP
8 in arriving at payment plans with tax authorities and maintained CBP’s lease in good standing.

9 11. I understand that on or about February 5, 2025 at 10:30AM, inspector Corey Blake
10 inspected CBP’s business premises and produced a Licensing Inspection Checklist. A true and correct
11 copy of the Licensing Inspection Checklist which I received is attached to CBP’s Index of Exhibits
12 and Exhibits as Exhibit 23.

13 12. The DCR claims in its Denial to have contacted me by phone and email on March 28,
14 2024, to inform me that CBP’s record had expired and that continued operations without a license
15 could result in enforcement. I have no recollection of any such phone call, nor have I ever seen or
16 received any such email. Having no familiarity with CBP’s licensing or regulatory obligations, I
17 would have provided any such communication promptly to Ms. Castelo in accordance with the MSA.
18 I also reasonably expect that a regulatory agency posing existential threats to CBP – if these occurred
19 – would be directed to CBP’s business premises in the form of a formal written notice in the mail.

20 13. Before DCR issued its Denial on May 21, 2025, I did not receive any communication
21 alerting me to alleged deficiencies with CBP’s license or its records.

22 14. To my knowledge, no such communication was ever directed to CBP’s new owner,
23 Valeria Castelo, or to CBP’s outside counsel, Kristen Keshishian.

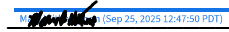
24 15. DCR’s unwillingness to communicate by traditional means, to new CBP’s new owner,
25 to mail important notices, or communicate with CBP’s counsel has significantly prejudiced me as my
26 understanding was that the promise of the Social Equity Program was to place persons like me in
27 position to be successful cannabis entrepreneurs. To the contrary, the DCR’s confusing and disjointed
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1 communication process has prejudiced me with strict adherence to technicalities that have no function
2 other than to deny an otherwise good operating cannabis business of its entitlements.

3 16. I am making this declaration voluntarily and based on my personal knowledge of the
4 events during my ownership and management of CBP.

5 17. I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

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8 Executed on 25/09/2025, 2025, at Los Angeles, California.

9
10  (Sep 25, 2025 12:47:50 PDT)

11 By: Mary Amanda Witherspoon

DECLARATION OF VALERIA CASTELO

I, Valeria Castelo, have personal knowledge of the following and hereby declare as follows:

1. On or around February 14, 2024, I entered into a series of transactions to purchase 49% of the outstanding membership interests in Colorado Blvd Partners, LLC (“CBP”) (the “**Equity Purchase**”).

2. The Equity Purchase is set forth and memorialized in a certain series of Equity Purchase Agreements dated February 14, 2024 between myself and CBP’s former members Jim Sullivan, Rachel Wilson, and Daniel Wise. These agreements were duly executed and reflected the negotiated consideration, ownership percentages, and terms under which I became a member of CBP. True and correct copies of the Equity Purchase Agreements are attached to CBP’s Index of Exhibits and Exhibits as **Exhibits 3–5**.

3. Through these transactions, I acquired an aggregate 49% membership interest in CBP. Mary Amanda Witherspoon continued to be CBP’s 51% member and Social Equity Individual Applicant.

4. Concurrently with the Equity Purchase, I entered into a Management Services Agreement (“**MSA**”) with CBP. Pursuant to the MSA, I assumed a direct role in managing CBP’s operations.

5. At the time of the Equity Purchase, CBP was operating at 1731 Colorado Boulevard Los Angeles, California 90041 (the “**Premises**”).

6. Prior to the Equity Purchase, CBP’s operational standards were poor, its recurring cashflow was insufficient and without adequate reserves, its tax payments were defaulted, and its Premises was not consistent with a class-A retail facility.

7. A primary purpose of my entering into the Equity Purchase was to facilitate my

1 injection of much-needed capital into CBP.

2 8. In furtherance of this purpose and following the Equity Purchase, I invested no less
3 than \$1,500,000 in capital into CBP’s premises build-out, business operations, inventory, and retention
4 of counsel for DCR coordination.

5 9. Immediately following the Equity Purchase, I created an Accela owner account and
6 completed all required forms to submit an ownership modification request to the Los Angeles
7 Department of Cannabis Regulation (“DCR”) to reflect my new membership interest. These forms
8 included updated ownership disclosures, financial records, and personal background information
9 required under the DCR’s licensing protocols. All forms were signed, dated, and uploaded through my
10 individual owner portal in accordance with DCR procedures. True and correct copies of the submitted
11 ownership modification forms and supporting disclosures are presented as **Exhibits 6–7**.

12 10. Simultaneously, I also sought to designate attorney Kristen Keshishian, an attorney I
13 retained on behalf of CBP at my own expense, as CBP’s authorized legal representative and contact of
14 record. A true and correct copy of an Accela Portal Screenshot Showing KK Legal Advisory as
15 authorized legal contact is attached to CBP’s Index of Exhibits and Exhibits as **Exhibit 17**.

16 11. CBP’s prior owners did not provide credentials or access to CBP’s DCR entity Accela
17 portal to either myself or Mary Amanda Witherspoon. I reasonably relied on the understanding,
18 common within the industry and not contradicted by DCR’s public guidance, that an individual owner
19 portal would reflect all critical updates, notices, and communications from DCR regarding license
20 status and compliance obligations.

21 12. Accordingly, I was forced to rely on my individual owner Accela portal. I reasonably
relied on the concept that my ownership portal would contain substantially similar information and
communications from DCR, if any, as any other portal affiliated with CBP. It was unforeseeable that

1 certain information would be gatekept or available only to certain portals but not others.

2 13. I now understand, but did not know at the time, that individual owner Accela portals
3 contain only limited and incomplete information by comparison to, for example, the CBP entity portal.
4 This action was taken without any prior notice, deficiency warning, or opportunity to cure, thereby
5 depriving me of due process and frustrating the very compliance the DCR claims to require.

6 14. Despite being properly submitted, DCR unilaterally marked my submitted ownership
7 modification record (LA-C-25-000020-MOD) as “Abandoned” on January 29, 2025, without any prior
8 notice to me. At no point did I receive an invoice, deficiency notice, portal update, email
9 communication, or any other correspondence from DCR or its assigned analyst regarding the
10 processing of this modification, the status of the record, or any outstanding documents.

11 15. Despite these obstacles, to the best of my knowledge, I took every possible step in good
12 faith to ensure CBP remained in compliance with the DCR, including:

- 13 a. In September 2024, CBP entered into a tax Installment Payment Plan with the City
14 of Los Angeles to cure liabilities inherited from prior ownership. Since then, I
15 ensured consistent monthly payments of \$6,230.24, as reflected in Exhibit 10
- 16 b. On October 22, 2024, CBP received a renewal invoice and, on December 30, 2024,
17 paid Invoice #20906 (2025 Record Renewal). True and correct copies of these
18 receipts are attached as Exhibit 8.
- 19 c. I also oversaw repayment of all outstanding cannabis tax obligations owed to the
20 California Department of Tax and Fee Administration (CDTFA) which were
21 incurred during CBP’s predecessor ownership regime.

16. Indeed, all DCR invoices which CBP has received have been paid. The Los Angeles
Office of Finance has accepted and retained each of CBP’s payments. It was not until after DCR issued

1 its Denial on May 21, 2025, that I became aware, indirectly and without formal notice, that a late-paid
2 2024 invoice may have existed in CBP's entity Accela portal. Neither I nor Ms. Witherspoon had
3 access to that portal, and at no time were we notified that such a fee was outstanding or that it could
4 jeopardize the modification request. Had I received even a single communication or deficiency notice
5 regarding CBP's records or invoices, I would have addressed the issue immediately and cured any
6 defect. DCR's failure to provide such notice prevented any opportunity to remedy the issue and
7 resulted in undue and avoidable prejudice to myself and CBP.

7 17. Before DCR issued its Denial on May 21, 2025, I received no direct communication of
8 any kind from DCR or its analysts alerting me to any alleged issues, deficiencies, or problems with
9 CBP's license or related records.

10 18. CBP ceased operations immediately following receipt of DCR's Denial. CBP
11 nevertheless continues to remain in good standing with respect to its Office of Finance repayment
12 plan, and continues to maintain the lease at the Premises in good standing with no defaults.

13 19. I am making this declaration voluntarily and based on my personal knowledge of the
14 events during my ownership and management of CBP.

15 20. I respectfully request that DCR reconsider its prior determination and reinstate the
16 modification record for proper processing, or provide a clear and curable path forward that reflects the
17 actual facts and documented efforts made in this matter.

18 21. I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on September 24, 2025, at Los Angeles, California.

21 By: *Valeria Castelo* Valeria Castelo

DECLARATION OF KRISTEN KESHISHIAN

I, Kristen Keshishian, have personal knowledge of the following and hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. My California State Bar Number is 342040.

2. In early 2024, I was retained by Colorado Blvd Partners, LLC’s (“CBP”) new owner, Valeria Castelo, to assist with licensing and compliance matters before the Los Angeles Department of Cannabis Regulation (“DCR”) and the Department of Cannabis Control (“DCC”).

3. On or about February 14, 2024, following an internal reorganization and equity interest purchase agreements (Exhibit 3-5), CBP submitted ownership modification requests to DCR. These requests sought to update ownership to reflect new equity holder Valeria Castelo.

4. True and correct copies of the modification forms, including the LIC-4004-MOD and supporting ownership disclosure forms, are provided in Exhibit 6-7.

5. On January 4, 2025, I was authorized by CBP to submit and did submit ownership modification forms sufficient to designate me as CBP’s legal representative and authorized contact for licensing matters.

6. Between December 23, 2024, and January 21, 2025, I sent at least six separate written communications to DCR analysts seeking clarification on CBP’s licensing record (Exhibit 11). Specifically, I sent emails on December 23, 26, and 30, 2024, and on January 6, 9, and 21, 2025.

7. In these communications, I requested clarification regarding CBP’s renewal invoices, licensing status, and record numbers to ensure compliance and avoid lapse. DCR did not respond to any of these communications.

8. Frustrated with the lack of communication from DCR, I sought to schedule a

1 meeting in order to gain the clarity needed for my client.

2 9. On January 6, 2025, I called DCR to speak directly with Corey Blake, the assigned
3 analyst. My request was refused, and I was told instead that Mr. Blake would be sent an email
4 requesting that he call me.

5 10. I never received a phone call from Corey Blake.

6 11. Instead, I received an emailed meeting invite on January 14, 2025 from Mr. Blake,
7 which purported to establish meeting between myself, Mary Amanda Witherspoon and Corey
8 Blake, scheduled on less than 24-hours notice on January 15, 2025 at 10:00AM.

9 12. My intention was to be present at the meeting.

10 13. On January 15, 2025 at 7:25AM, I was advised that Mr. Blake had cancelled the
11 meeting. A true and correct copy of the meeting cancellation is attached as to CBP's Index of
12 Exhibits and Exhibits as **Exhibit 21**.

13 14. No explanation or alternative meeting appointment was provided.

14 15. Thereafter, I sent an email to dcr.sep@lacity.org, advising that Mr. Blake had
15 unilaterally cancelled our important meeting at the last minute after I had been awaiting answers
16 for weeks regarding DCR's cryptic process and communications which had not made their way to
17 anyone in control of CBP.

18 16. Despite CBP's timely submission and my persistent communication with DCR,
19 DCR did not process the modification and later unilaterally marked the modification record
20 'Abandoned' on January 29, 2025, without notice to CBP or to myself. The modification was
21 locked within the Accela portal, and erroneously cited to a missing LIC-4005-Form that had been
22 included in CBP's/Ms. Castelo's timely submission (Exhibit 6).

23 17. As a result of DCR's failure to properly process the modification, neither Ms.
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1 Castelo nor I, as CBP's designated legal representative, were recognized within CBP's entity
2 Accela account or under CBP's Legal Business Entity Record LA-B-0003369121. To the best of
3 my knowledge, this exclusion is what prevented Ms. Castelo and myself from receiving critical
4 notifications, invoices, or communications from DCR.

5 18. I now believe that when Valeria Castelo obtained her interest in CBP, that the 2024
6 Renewal Invoice had been unpaid at the time because the only communication regarding that
7 invoice had been sent to one of the outgoing owners, and not provided to any other Accela portal
8 associated with CBP.

9
10 19. At my direction, CBP has paid any and all DCR invoices and my understanding is
11 that none is outstanding. The Los Angeles Office of Finance accepted each of CBP's payments
12 and has not returned any funds.

13 20. Before DCR issued its Notice of Denial on May 21, 2025 (Exhibit 1), I received no
14 direct communication of any kind from DCR or its analysts alerting me to any alleged issues,
15 deficiencies, or problems with CBP's license or related records.

16
17 21. This lack of access and transparency directly contributed to CBP's inability to
18 address unknown alleged deficiencies before DCR issued its May 21, 2025, Notice of Denial in
19 good faith.

20 22. I am making this declaration voluntarily and based on my personal knowledge of
21 the events during my representation of CBP.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed on Sep 25, 2025, 2025, at Los Angeles, California.

24
25 *Kristen Keshishian*

26 By: Kristen Keshishian

< Back

1 MESSAGE

Summarize

Found in kristen@kklegaladvisory.com Inbox



From: **Corey Blake** >

To: **Kristen Keshishian** >

Reply To: **Corey Blake** >

January 15, 2025 at 7:25 AM

**Canceled event with note: 320031,
License Record Discussion @ Wed Jan
15, 2025 10am - 10:15am (PST)
(kristen@kklegaladvisory.com)**

**This event has been canceled and removed
from your calendar with a note:**
"Apologies.. this meeting has been cancelled and
will be rescheduled."

Join with Google Meet

Meeting link

meet.google.com/aob-pvtg-kju

Join by phone

(US) +1 260-218-1720

PIN: 825173710

[More phone numbers](#)

Meeting to discuss Application Record No



Search bar containing "Corey Blake" with a search icon on the left, a close icon (x) on the right, and a "Cancel" button.

Message header with three columns: "From", "To", and "Message".

CB **Corey Blake** 1/15/25 >
Canceled event with note: 320031, License R...
320031, License Record Discussion This event has been canceled and removed from your calendar with a note: "Apologies.. this meeting has been cancelled and will be rescheduled." Join with Google Meet Meeting link meet.google.com/aob-...

← **CB** **Corey Blake** 1/14/25 >
Invitation: 320031, License Record Discussion...
320031, License Record Discussion Join with Google Meet – Meeting to discuss Application, Record No. 320031-ANN (Retail), Payments, Next Steps, etc.. If Available, please respond by selecting "Yes". Join with Google Meet Meeting li...

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