Brief on the Office of Finance's Negligence and City's Systemic Failures in Cannabis Regulation

Submitted to: Los Angeles City Council Government Operations Committee
Submitted by: Good Times Crenshaw (Gorilla Rx Wellness)
Date: February 3, 2025

I. Introduction

Good Times Crenshaw, a licensed Social Equity cannabis business, has endured substantial financial harm due to systemic inefficiencies and negligence within the Los Angeles Office of Finance. This mismanagement has resulted in an unjust accumulation of penalties and interest, now comprising nearly **40% of our total outstanding tax debt**.

The Office of Finance's failures disproportionately impact Social Equity operators, who do not have the working capital to absorb administrative errors and delays. Our case is **not an isolated incident**, but a clear indication of a broken tax administration system that punishes legal cannabis businesses—especially Social Equity operators—while illicit dispensaries continue to thrive unchecked.

We present irrefutable evidence of the following:

1. **Multiple tax payments submitted via Payquik were never processed**, then returned **6-8 months later** without explanation, leading to interest and penalty charges.
2. **Repeated failures by the Office of Finance to respond to taxpayers**, despite eight outreach attempts over a 90-day period before receiving a response.
3. **Misallocation of tax payments**, with funds being **incorrectly applied to penalties instead of actual tax liabilities**.
4. **An unsustainable taxation structure that disproportionately harms Social Equity operators**, making compliance nearly impossible while illicit dispensaries continue to operate freely.

We demand an **immediate intervention, an independent audit, and corrective policy actions** to prevent further financial ruin for Social Equity operators.

II. The Office of Finance's Failure to Process Tax Payments

A. Evidence of Payments Made but Not Processed

Good Times Crenshaw followed all proper procedures, submitting tax payments via **Payquik**, a regulated financial institution. Under Payquik's system, funds are **immediately withdrawn at the time of issuance**, meaning our payments were fully funded and guaranteed.

Despite this, our payments were **never credited to our tax account**, and months later, they were **returned without notice or explanation**.

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We provide the following evidence:

- **Bank Transaction Evidence** (Attached: Exhibit A)
  On **April 18, 2023**, Good Times Crenshaw made a **$26,550** tax payment via Payquik to the Office of Finance. The withdrawal was successfully processed, as evidenced by the attached bank statement.

Exhibit A

Tuesday, April 18, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$26,550.00	Completed	Details

- **Office of Finance Statement Showing No Record of Payment** (Attached: Exhibit B)
  Despite the **April 18 payment**, the Office of Finance later **assessed penalties and interest**, claiming non-payment. Their own records **fail to reflect the transaction**, inflating our total tax liability for that month to **$37,234** due to their failure to process our payment.

Exhibit B

YEARS	FCC		BASIS FOR TAX	PRINCIPAL	INTEREST	PENALTY	FEES	OVERPAY	TOTAL
202304M	L711	A Reported Measure	None						
		B Payment Applied		0.00	0.00	0.00	0.00	0.00	0.00
		C Audited Measure/Liability	27.202	1,400.00	176.40	560.00	0.00	0.00	2,136.40
		D Credits Applied		0.00	0.00	0.00	0.00	0.00	0.00
		E Difference (C-B-D)		1,400.00	176.40	560.00	0.00	0.00	2,136.40
	L712	A Reported Measure	None						
		B Payment Applied		0.00	0.00	0.00	0.00	0.00	0.00
		C Audited Measure/Liability	229,055	23,000.00	2,898.00	9,200.00	0.00	0.00	35,098.00
		D Credits Applied		0.00	0.00	0.00	0.00	0.00	0.00
		E Difference (C-B-D)		23,000.00	2,898.00	9,200.00	0.00	0.00	35,098.00
		TAX PERIOD BALANCE		**24,400.00**	**3,074.40**	**9,760.00**	**0.00**	**0.00**	**37,234.40**

This is **not an isolated occurrence**—it has happened **multiple times**, resulting in tens of thousands of dollars in wrongful penalties and interest. (Attached Bank Transactions: Exhibit C)

B. Failure to Communicate & Administrative Negligence

Since October 2024, Good Times Crenshaw **sent eight separate emails** to the Office of Finance requesting resolution of these issues. **No response was received for over 45 days**, all while penalties and interest continued to accrue.

Key failures include:

- **No notification was provided** when our payments were left unprocessed.

- **No corrective action was taken** even after multiple inquiries.
- **No transparency** in how payments were misallocated.

This ongoing pattern of negligence **artificially inflates Social Equity businesses' tax burdens**, pushing legal businesses closer to insolvency.

III. The Unjust Imposition of Penalties and Interest on Social Equity Operators

A. A Significant Portion of Our Outstanding Tax Debt is Due to Administrative Errors

Nearly **40% of our outstanding tax debt consists of penalties and interest—not actual taxes owed**.

- **In multiple instances, our payments were returned months later**, yet penalties continued accruing as if we had never paid.
- **When we made cash payments to resolve the issue, they were applied to penalties instead of our actual tax balance**, exacerbating our financial hardship.

B. An Over-Taxation Crisis That Encourages Illicit Market Growth

The taxation structure for cannabis retailers is so excessive that compliance is **economically impossible**:

- **Example: July 2024 Financial Breakdown**
  - **2,139 customers served**
  - **$94,681 gross revenue**
  - After taxes, rent, and payroll, only **$900 remained**
  - **This does not include** security, insurance, or inventory costs

The legal market is being **suffocated by taxes**, while illicit dispensaries operate **without enforcement or penalties**. (Attached Detailed Gorilla Rx Tax Breakdown: Exhibit D)

The city's stated goal of **supporting Social Equity businesses is actively being undermined** by this punitive taxation system.

IV. DCR's Licensing Delays & Failure to Prioritize Social Equity

While EMMDs have been given **every advantage**, Social Equity operators continue to face **unjust regulatory roadblocks** that threaten our survival.

It took 1730 for Good Times Crenshaw to open its doors. For a routine modification request, it took over **230 days** for the **Department of Cannabis Regulation (DCR) to process our application** (Attached Documentation of DCR Licensing Delays- Exhibit E). These delays **directly hindered our ability to grow, expand, and remain compliant.**

These **unacceptable delays** have caused **operational and financial setbacks** that no EMMD has had to endure.

EMMDs were handed every opportunity while we were set up to fail:

- They were allowed to operate without zoning restrictions.
- EMMD's were afforded FIRST-MOVERS ADVANTAGE- given years to gain market share and expand, while Social Equity applicants were stuck waiting.
- They were allowed to vertically integrate, building supply chains without Social Equity license holders.

Meanwhile, **Social Equity businesses are being crushed by excessive taxes, high rents, compliance costs, and extreme regulatory barriers.**

The **DCR's failure to process applications in a timely manner is yet another example of how this City has actively worked against Social Equity success.**

V. Legal and Policy Recommendations

The Office of Finance's failures violate basic principles of **fairness, due process, and economic justice**. To correct these systemic issues, we demand:

1. **Immediate removal of all penalties and interest resulting from unprocessed payments.**
   - If a taxpayer **submitted** a payment that was later returned due to the Office of Finance's error, they should not bear the financial burden.
2. **Immediate Allocation of $110 million in cannabis tax credits to fund Emergency Tax Amnesty and Tax Holiday for Social Equity Operators** (Attached SEP Budget Recommendations : Exhibit F)
   - Forgiving all past-due city cannabis taxes for social equity businesses
   - Enacting a tax holiday so we have a fighting chance to stabilize
3. **An independent audit of the Office of Finance's cannabis tax processing system.**
   - This audit must identify how many other Social Equity operators have suffered similar financial harm.
4. **A complete restructuring of the cannabis taxation framework.**
   - The current tax structure is **unsustainable and inequitable** and must be revised to ensure Social Equity businesses can remain solvent.

V. Conclusion

For **eight years**, we have fought to participate in an industry that was built on our backs (Attachment Councilman Marqueece Harris-Dawson Commitment to Social Equity- Exhibit G), only to be met with **deliberate obstacles, broken promises, and systemic failures** at every turn.

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- The City told us Social Equity would be a **pathway to ownership**, but instead, it has been a **trap—saddling us with impossible taxes, delays, and financial ruin.**
- The City promised **priority licensing**, but we were **forced to wait years while EMMDs built empires.**
- The City promised **financial support**, but over **$864 million in cannabis tax revenue was funneled into the general fund while we received crumbs—if anything at all.**
- The City promised **regulatory fairness**, but while **we drown in debt and compliance costs, illicit shops thrive with no enforcement.**
- The City promised **Social Equity funding**, but after **years of waiting, even the smallest grants are mishandled, delayed, or redirected to cover their own fees.**
- Meanwhile, the **Office of Finance penalizes us for its own incompetence, DCR drags its feet, and City officials continue to study the issue instead of fixing it.**

How many more businesses have to close? How many more of us have to lose everything before you admit this program has failed us?

I REQUEST that this committee move to stall the grandfathering of EMMDs until this committee drafts a motion for Social Equity Tax Amnesty and a Tax Holiday today.

Good Times Crenshaw, along with other Social Equity businesses, cannot sustain these financial injustices any longer. **The future of the legal cannabis industry in Los Angeles depends on immediate reform.**

Blessings,

Kika Keith

Good Times Crenshaw (Gorilla Rx Wellness)

323-439-6760

Office of Finance UNACCOUNTED Tax Payments and Reversals (Exhibit C)

For deeper context, the transactions listed in red, are payments that fully left our account in the form of a cashiers check to the City of LA Office of Finance. These payments have not been credited to our account. The transactions listed in green are refunds from uncashed checks some 6-8 months after the checks were issued. The transactions in red outline $202,387.35 in taxes that were paid, which were not attributed to our account. To date, we have received back just under $100,000 in Bill Pay Reversals for uncashed checks.

Tuesday, April 18, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$26,550.00	Completed	Details
Monday, September 18, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$23,800.00	Completed	Details
Tuesday, September 19, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$10,000.00	Completed	Details
Tuesday, September 26, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$15,000.00	Completed	Details
Thursday, September 28, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$10,000.00	Completed	Details
Monday, October 30, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$20,150.00	Completed	Details
Wednesday, November 15, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$18,000.00	Completed	Details
Thursday, December 21, 2023 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$16,700.00	Completed	Details
Wednesday, January 31, 2024 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$15,050.00	Completed	Details

Friday, March 22, 2024 (PT)	Withdrawal	City of LA Business Tax (XXXXXXXXXX-XX01-5)	$7,600.00	Completed	Details
Friday, March 22, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$10,000.00	Completed	Details
Friday, March 22, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$23,800.00	Completed	Details
Monday, April 8, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$10,000.00	Completed	Details
Monday, April 8, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$15,000.00	Completed	Details
Thursday, May 16, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$18,000.00	Completed	Details
Tuesday, May 7, 2024 (PT)	Deposit	Bill Pay Reversal (City of LA Business Tax)	$20,150.00	Completed	Details
Monday, July 1, 2024 (PT)	Withdrawal	3rd Party ACH (LA MONTH TAX EC)	$11,000.00	Completed	Details
Thursday, August 1, 2024 (PT)	Withdrawal	3rd Party ACH (LA MONTH TAX EC)	$9,900.00	Completed	Details
Friday, September 6, 2024 (PT)	Withdrawal	3rd Party ACH (LA MONTH TAX EC)	$9,037.35	Completed	Details
Wednesday, October 2, 2024 (PT)	Withdrawal	3rd Party ACH (LA MONTH TAX EC)	$9,600.00	Completed	Details

Gorilla Rx Tax Breakdown: Exhibit E

URGENT NEED OF RELIEF FOR LOS ANGELES CANNABIS SOCIAL EQUITY RETAILERS

My name is Kika Keith, and I am the proud owner of **Good Times Crenshaw aka Gorilla Rx Wellness Co.**, the First Black woman-owned Social Equity dispensary in Los Angeles. As the co-founder of the Social Equity Owners and Workers Association, my story is representative of hundreds of Retail Equity founders across this state. It has been a long and challenging journey for us to get our doors open, and I'd like to share with you some of the extraordinary barriers social equity retailers face in our industry.

My pathway to licensure in Los Angeles, took over 1730 days and cost over $350,000 in rent before I ever opened doors, while waiting on regulators and bureaucratic delays. This excessive waiting period and financial burden are some of the most significant barriers faced by social equity and small minority-owned operators. Unlike well-funded, large cannabis companies, social equity/minority operators lack the financial resources to withstand these prolonged delays and expenses.

In addition to the challenges in obtaining licensure, social equity/minority operators face considerable financial barriers once we open our doors.

True Impact: High Taxes Plus Ongoing Costs of Regulatory Compliance

Here is an actual snapshot of my first six months of operations. Gorilla Rx had a tax bill of over a [illegible] **A MILLION DOLLARS!** Not to mention the $206,000 that my customers were charged for sales tax. This excessive state and local taxes have unfairly hurt my equity business and other social equity operators significantly, including the communities we serve.

We are unable to thrive in California's broken system, many of us are now facing the imminent loss of our businesses and ability to provide for our families. This egregious overtaxation is unreasonable and is the direct antithesis to social equity and cannabis justice.

Gross Receipts (GR)	$2,030,325.39
Taxes	$531,331.61
COGS (Cost of Goods Sold)	$1,314,299
Rent	$126,600
Utilities	$20,098
Payroll	$180,459
Security	$185,612
Liability Insurance	$14,100.08
Workers Compensation	$36,405.88
Point-of-Sale System	$8,250
Total OPEX	$1,885,824
Total OPEX + Tax	$2,417,155

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SEP Budget Recommendations- 2017 Social Equity Analyis Report : Exhibit F

Cannabis Social Equity Analysis Report

Prepared by

Alan Foster Wheeler Environmental & Infrastructure, Inc
324 West Anapamu Street, Suite 204 A
Santa Barbara, California 93101

for

City of Los Angeles
Shawn W. Yu
Chief Legislative Analyst
200 North Spring Street
Los Angeles, California 90012

Social Equity Program Industry Ownership Investment Program and Fund

Start up costs represent one of the principal economic barriers to social equity applicants entering the legal cannabis industry. A City-managed fund should be created to provided zero (or low) interest business loans for social equity applicants seeking to start new cannabis businesses within the City. The loan program should be funded by a 1% service fee paid by licensees beginning in 2018 or from ongoing City cannabis tax revenues.

Estimated Social Equity Program Budget

The above recommended Cannabis Social Equity Program initiatives will require funding proposed to be derived from City tax revenues from cannabis related businesses taken in by the Department of Cannabis Regulation and the Office of Finance. The City Controller estimates the City could be entitled to collect at least $50,000,000 dollars from retail sales alone in 2018, or $250,000,000 over the next 5 years. This estimate is based on City tax rates for commercial cannabis sales ($100 per $1,000 of gross receipts) and medical cannabis sales ($50 per $1,000 of gross receipts). However, this estimate does not include City tax revenue collected from cultivation and manufacturing ($20 per each $1,000 of gross receipts) and transportation, testing, or research ($10 per each $1,000 of gross receipts) that will expand as the commercial cannabis supply chain coalesces.

Costs for implementation of all initiatives of the proposed Cannabis Social Equity Program are estimated to cost $22 million per year or $110 million for the first 5 years of the Program. This reflects a front-loading of start-up costs for Program initiatives such as the Community Reinvestment and Industry Ownership Investment Fund Programs. Estimated costs of select, specific Program initiatives are listed below:

- Community Reinvestment Program: Allocate 20% of City cannabis tax revenues based on economic impacts to Social Equity Program communities
  - Estimated Cost: **$10,000,000** per year ($50,000,000 for first 5 years)
- Industry Ownership Investment Program and Fund: This fund is anticipated to include City and private investment from non-Social Equity Program cannabis businesses that are seeking to assist Program-eligible cannabis businesses
  - Estimated Cost: **$6,000,000 per year** ($30,000,000 for the first 5 years)
- Waived/Deferred Fees for Social Equity Businesses: Fee waivers for initial application processing and compliance processing overtime
  - Estimated Cost: **$5,000,000** per year ($25,000,000 for first 5 years) assuming 1,000 Social Equity Program businesses at a fee cost of $25,000 per business
- Live Scan Processing Assistance: Funds allocated to assist Social Equity Program-eligible businesses and employees with Live Scan process
  - Estimated Cost: **$300,000 per year** ($1,500,000 for first 5 years) assuming $75 per Live Scan for 20,000 individuals over 5 years
- Expungement Assistance: In order to provide legal clinics and attorneys to assist community members in expunging cannabis convictions from their records
  - Estimated Cost: **$15,000 per year** ($75,000 for first 5 years) assuming 10 legal clinics per year staffed by 10 attorneys per six-hour event
- Business and Compliance Training: Initial development of training materials and training events to potentially be supplied by a third-party consultant
  - Estimated Cost: **$500,000** for first year of development and implementation

DOCUMENTATION OF LICENSING PROCESS

Business Name:	**Good Times Crenshaw dba. Gorilla Rx Wellness Co. formerly known as "Perfect Union Crenshaw"**
License Type:	**Phase 3 Round 1 Storefront Retail & Delivery Adult-Use/Medical**
Address:	**4233 CRENSHAW Blvd. Los Angeles 90008**
Social Equity Applicant:	**Kika Keith-Sturgis**
Application No.:	**LA-C-19-310144-R-APP**

SUMMARY:

October 2019, my investor "Perfect Union" severed our contract after Council President Herb Wesson announced the halt of Phase 3 Round 1 for an audit. Upon notification of my eligibility for further processing, I submitted a request for Application Modification of my business name and ownership change to the DCR via Accela portal on NOVEMBER 2020.

AS OF JUNE 1ST, THE DCR HAS TAKEN 109 DAYS TO REVIEW MY APPLICATION MODIFICATION REQUEST SINCE RECEIPT OF MY PAYMENT OF INVOICE.

AND OVER 230 DAYS HAS PASSED SINCE THE DATE OF MY APPLICATION MODIFICATION SUBMISSION TO THE DCR VIA ACCELLA.

Application Modification Request Timeline

NOVEMBER 27, 2020, after submitting Application Modification Request, I received a notification on the Accela portal with Invoice #4947. As detailed on the Department of Cannabis workflow, I emailed the Office of Finance and cc: DCR, to pay my invoice for the modification request.

Kika Kieth

Hello-
I applied for an Application Modification with the Department of Cannabis Regulation on 11/22 and received invoice #4947. I would like to remit payment as soon as possible. Is an appointment required?

Blessings,
Hakika Keith-Sturgis
LA-C-20-000050-MOD
323-439-6760

Apply for a License | Search for a License

License LA-C-20-000050-MOD:

Application Modification Request

Record Status: Waiting for Payment

Payments

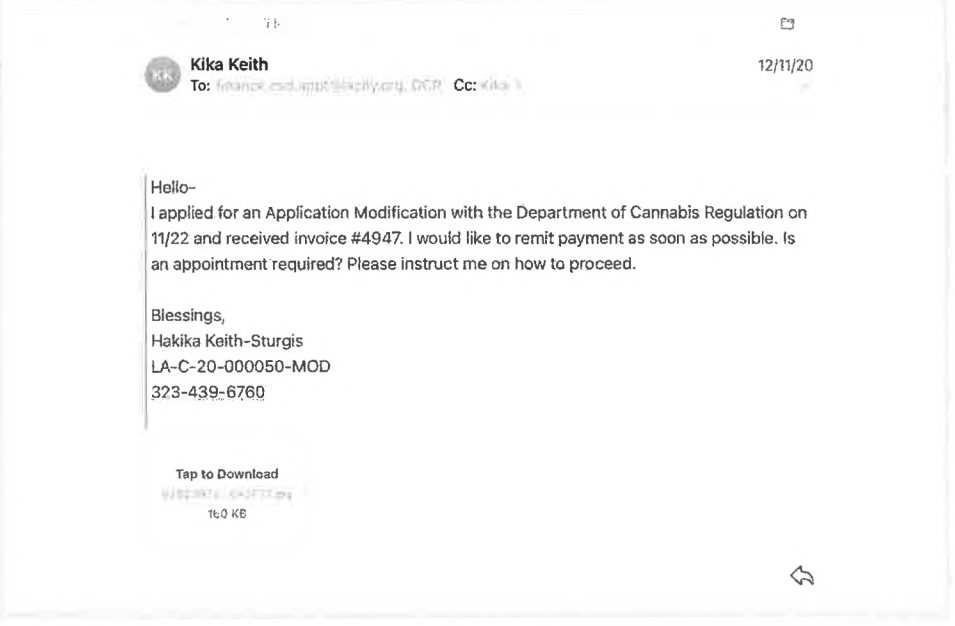
Fees

Outstanding

Date	Invoice Number	Amount
11/22/2020	4947	$542.00

Total outstanding fees: $542.00

DECEMBER 11, 2020, after receiving NO response, I made a 2nd request to the Office of Finance and DCR to pay my Modification request.



Kika Keith 12/11/20
To: finance.cod.apps@lacity.org, DCR Cc: Kika

Hello-
I applied for an Application Modification with the Department of Cannabis Regulation on 11/22 and received invoice #4947. I would like to remit payment as soon as possible. Is an appointment required? Please instruct me on how to proceed.

Blessings,
Hakika Keith-Sturgis
LA-C-20-000050-MOD
323-439-6760

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160 KB

<u>DECEMBER 11, 2020</u> I received a response back from the Office of Finance, stating that I was not invoiced yet.

DCR Licensing 12/11/20
To: Kika Cc: financeCSD, Kika

Re: Invoice #4947

Good morning,

Thank you for your email.

You have not yet been invoiced for the modification.

Please continue to check your email regularly for any updates.

Kind regards,

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

See More

<u>DECEMBER 19, 2020</u> After participating in Cannabis Regulation Commission meeting, I followed the instructions outlined by Jason Killeen, to request e-billing payments to the Office of Finance, due to Covid-19.

Kika Keith 12/19/20
To: finance.csd.appt@lacity.org Cc: DCR, Kika Bcc: madisonshockley@gmail.com

Good Afternoon-
The Department of Cannabis Regulation has informed me to make a request/appointment for E-Billing to remit payment for the following invoices:

INVOICE # 4947
Hakika Keith-Sturgis aka Good Times Crenshaw aka Perfect Union Crenshaw
4233 Crenshaw Blvd Los Angeles, CA 90008
LA-C-20-000050-MOD
AMOUNT: $542.00

INVOICE # 5080
Hakika Keith-Sturgis aka Gorilla Rx
219 W 7th Street, Basement Los Angeles, CA 90014
LA-C-20-001566-APP-PREAPP
AMOUNT: $597.00

Please let me know earliest available appointment to remit payment and e-billing option.

Blessings,
Hakika Keith-Sturgis
323-439-6760
LA-C-19-310144-R-APP

<u>DECEMBER 21, 2020</u> I emailed my assigned DCR Analyst, my 3rd request for invoice/e-billing payment instructions for Modification request.

Kika Keith 12/21/20
To: marissa.garcia@lacity.org Cc: Kika

Hakika Keith-Sturgis - LA-C-19-310144-R-APP

Good Morning Marissa-
I submitted my application modification documents several weeks ago, with all appropriate supporting documents. I have made several attempts to pay review invoice and have yet to be provided e-billing or payment instructions.

In addition, I also submitted required documents for my temporary approval. I would like to request my DCR inspection and would like to submit my state application to expedite the processing any way possible, as I have been paying rent on an empty property for over 2 years. Please advise.

Blessings,
Hakika Keith-Sturgis
323-439-6760
LA-C-19-310144-R-APP

<u>DECEMBER 21, 2020</u> the Office of Finance responded, requesting that I send invoices.

financeCSD Appt
To: Kika Cc: [illegible], Kika

Good Morning Kika,

Thank you for your email. Please send over the invoices for review.

Thank you
Sheryl

On Sat, Dec 19, 2020 at 1:56 PM Kika Keith <[illegible]> wrote:
Good Afternoon-
[illegible]
LA-C-19-310144-R-APP

--

Cannabis Regulation Support Public Counter Unit (CRSPCU)
Contact Telephone Number [illegible]
Website: [illegible]

LA BUSINESS PORTAL

December 22, 2021, my DCR Analyst, Marissa Garcia, responded back and notified me that invoices would be generated JANUARY 2021.

Marissa Garcia
To: Kika Cc: Kika

Re: Hakika Keith-Sturgis - LA-C-19-310144-R-APP

Good Morning Kika,

Thank you for your email. Pleasure to touch base with you; I've recently been assigned your application records as your DCR Analyst. Please feel free to directly email me anytime you have a question or concern.

Modification - Yes, we've received your Application Modification request via the DCR Application Portal. Thank you for submitting everything correctly. Our Modification Process is underway and we will contact you once we are ready to review your specific request. Once the department determines that a modification is eligible for further processing, applicants will be provided further instructions regarding payment of their invoices. Due to some recent unforeseen circumstances with The Office of Finance, DCR is developing new processes for our applicants to remit payment in-person. Furthermore, invoices will not be generated until next month, January 2021. You do not have an invoice to pay at this time for the modification request.

Payment of Fees - Would you like further information regarding the payment option for in-person? I can send you a separate email for that. It sounds as though you may want to pay electronically. If so, just know that once you have an invoice, you would need to email a copy of it to finance.csd.appt@lacity.org for review. Afterward, a billing notice from Finance will be e-mailed back to you in order to process with payment here. Click on On-Line Bill Payment.

P3RR1 Process - Once our Licensing team has determined that an application contains all associated forms required for Temporary Approval initial inspection, we will begin scheduling and conducting inspections. I'm currently reviewing my caseload of records so I will soon be reaching out to you Kika to review your submitted forms. While this is occuring, we also have a team of DCR staff that will be reviewing Equity Share documents. Once the inspection is deemed "passing" *and* the Equity Share documents are deemed complete, DCR will then issue Local Authorization letters so that folks may begin applying to the State. Post-inspection, we will also continue to work with applicants to ensure that they have other documents on record, if they have not already submitted.

I hope I've answered your questions and addressed your concerns. As mentioned, please do not hesitate to contact me further.

On Mon, Dec 21, 2020 at 10:58 AM Kika Keith <lifedevelopmentgroup@gmail.com> wrote:

JANUARY 4, 2021 I made another request to the Office of Finance and DCR, for an invoice for my Modification Request based on earlier correspondence from the DCR analyst that invoices would be generated in JANUARY.

Kika Kieth
To: FinanceCSD Cc: DCR, Kika > 1/4/21

Hi Sheryl-
Has the DCR sent over my invoice yet?
Also, I applied for an alarm permit, I haven't received any correspondence on that permit application. Could you please confirm.

On Jan 4, 2021, at 11:58 AM, financeCSD Appt <finance.csd.appt@lacity.org> wrote:

See More

Kika Kieth
To: Marissa Garcia > 1/4/21

Hi Marissa-
I just received an email from Office of Finance, are my invoices ready so I can make payment?

Begin forwarded message:

See More

<u>JANUARY 4, 2021</u> After a month of requesting to pay my Application Modification invoice as informed by the DCR-posted workflows; the analyst notified me that the invoice process was "MISLEADING." The Analyst stated that there was NOT an established process for payment of Modification invoice, and it would be established in JANUARY.

Marissa Garcia 1/4/21
To: Kika Kieth >

Hello Kika,

When applicants log into their Accela accounts and view their application records (as you have done so with LA-C-20-001566-APP-PREAPP and LA-C-20-000050-MOD), they see a fee amount with a corresponding invoice number. Those are automatic and unfortunately, somewhat misleading.

The fee amount will be the fee reflected on your upcoming invoice(s) and once paid, that outstanding fee amount will go back to $0 balance due. I'm particularly not a fan of the invoice number because it misleads one to think that there is in fact an invoice but please know that at this time, there is not.

DCR has still not yet generated new invoices for applicants. I've been told that we anticipate doing so sometime this month of January. We are currently establishing a new payment process with the Office of Finance for applicants (given that we now only have downtown LA City Hall location available to us). Once that is finalized, we will communicate payment instructions and corresponding invoices to folks.

On Mon, Jan 4, 2021 at 12:20 PM Kika Kieth <kika@lifedevelopmentgroup.org> wrote:
Hi Marissa-
Show Quoted Content
--
Cannabis Regulation Support Public Counter Unit (CRSPCU)

--
Sincerely,
Marissa Garcia

financeCSD Appt 1/4/21
To: Kika Kieth >

Hello Kika,

We have no access to the DCR portal information, please follow up with them. In regards to the alarm permit, please allow 6-8 weeks for it to arrive.

Thank you
Sheryl

On Mon, Jan 4, 2021 at 12:18 PM Kika Kieth <kika@lifedevelopmentgroup.org> wrote:
Hi Sheryl-
Show Quoted Content
LA BUSINESS PORTAL

JANUARY 8, 2021 After receiving an email from DCR notifying applicants of newly established procedures as of 1/4/21, I followed outlined instructions and made another request to make payment for my Application Modification request to the Office of Finance.

Kika Keith 1/8/21
To: financeCSD Cc: Kika Bcc: lisaloyd2425@gmail.com >

Hi Sheryl-

The DCR notified me today that their procedures changed for making appointments to pay invoices with your Office. Please let me know earliest available appointment to remit payment and e-billing option.

INVOICE # 4947

Hakika Keith-Sturgis aka Good Times Crenshaw aka Perfect Union Crenshaw

4233 Crenshaw Blvd Los Angeles, CA 90008

LA-C-20-000050-MOD

AMOUNT: $542.00

INVOICE # 5080

Hakika Keith-Sturgis aka Gorilla Rx

219 W 7th Street, Basement Los Angeles, CA 90014

LA-C-20-001566-APP-PREAPP

AMOUNT: $597.00

Blessings,

Hakika Keith-Sturgis

323-439-6760

LA-C-19-310144-R-APP

To all Applicants and Licensees:

Due to the ongoing COVID-19 pandemic, the Office of Finance (Finance) is experiencing reduced capacity and office closures. As such, DCR is changing its invoice policy to ensure that Applicants have sufficient time to pay. This policy will be in place only while the Office of Finance is experiencing capacity issues due to the pandemic or related capacity reductions.

Therefore, **effective January 4, 2021, DCR will be issuing invoices to all persons only after a payment appointment has been scheduled and confirmed with the Office of Finance. Therefore, Applicants / Licensees must schedule a payment appointment with the Office of Finance in advance of receiving an invoice.** After DCR has been informed of the appointment, DCR will issue an invoice.

Effective January 4, 2021, the invoice issuance process will be as follows:

1. Applicant/Licensee submits an application or request requiring payment via DCR's Licensing Portal, such as a Pre-Application, Temporary Approval Application, Public Convenience or Necessity (PCN) request, or modification request.
2. On a weekly basis, DCR notifies Finance which specific applications or requests are eligible to schedule a payment appointment.
3. DCR emails the Applicant/Licensee to inform them that the Applicant/Licensee must request a payment appointment with Finance.
4. Finance confirms a payment appointment has been scheduled with both the Applicant/ Licensee and DCR.
5. DCR issues an invoice to the Applicant/Licensee. The invoice due date will fall on or after the scheduled appointment date.
6. Applicant/Licensee pays the invoice at the scheduled appointment.

Please note that all Applications and requests are not deemed filed and will not be processed until all required documents and information are received and the associated fees are paid. (*E.g.*, Los Angeles Municipal Code §§ (LAMC) 104.03(a), 104.03(e).)

Further, please note that failure to schedule or appear at an appointment with Finance may constitute an abandonment of an Application or request. (LAMC § 104.03(b).) In certain circumstances, requests may be submitted again, starting again at step 1 listed above.

Finally, please note that a balance due in DCR's Licensing Portal does not mean an invoice has been issued.

Kind regards,

Department of Cannabis Regulation

FEBRUARY 7, 2021 **70-Days after my initial request for an invoice for my Application Modification Request, I emailed Jason Killeen a detailed inquiry.**

Kika Keith 2/7/21
To: DCR, jason.killeen@lacity.org Cc: Kika Marissa & 3 more...

Good Afternoon Marissa and Jason-
I am humbly requesting immediate review of my Application Modification Request. As you both know, I have been leasing a compliant property since 2018, in my community. I have followed each procedure required by Sec.104.20 since the inception of the regulation. I have completed each step with respect to the growing pains of these newly formed policies. I have submitted multiple documents to ensure all modifications were completed accurately to meet both local and state requirements. Please note, I am not backed by a Multi-state operator, I am a longstanding South Central Los Angeles resident who is seeking licensing as a pathway to self-sufficiency for me and my children and an opportunity to reinvest in my community.

This afternoon, I emailed and uploaded all additional requested forms (notarized and executed) to my Accela account. Please let me know if there is anything else that I can do to assist in expediting this process so we can submit our state application.

Blessings,
Kika Keith-Sturgis
LA-C-19-310144-R-APP

On Feb 3, 2021, at 3:50 PM, DCR Licensing <dcrlicensing@lacity.org> wrote:

See More

DCR Licensing 2/9/21
To: Kika Cc: Jason, Kika, Marissa, normanyousif11@gmail.com, James & 1 more... >

Re: REQUIRED DOCUMENTS FOR TEMPORARY APPROVAL POST-INSPECTION: LA-C-19-310144-R-APP

Hi Kika,

I acknowledge that you have been extremely diligent in following every requirement we've asked of you. I thank you for that.

DCR will very soon be sending you an email, giving you the "green light" to proceed with scheduling a payment appointment with the Office of Finance. Due to the high volume of businesses that need to pay fees and our limited resources with the City Hall Office of Finance location solely available, applicants will be notified when appointment times are made available. Once you have scheduled an appointment and DCR confirms the appointment with the Office of Finance, we will generate the invoice associated with your Modification Fee.

The Modification Request is not officially before the department until the invoice is paid. We are gearing up for Modification Fees to be paid so that we may begin processing. While I do not have a timeframe for when this will at last be finalized, I *can* confirm with you that you *are* eligible to schedule a payment appointment (even though we have not yet sent you an email). **If you would like to contact the Office of Finance to initiate the payment appointment process, you may do so by emailing them at finance.csd.appt@lacity.org with your request.** Let them know how you intend to pay the $542 fee (cash, check, money orders, or credit card).

Kind regards,

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION

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

<u>FEBRUARY 2021</u> (120-Days after I submitted my modification request), I received a notice to pay invoice to review my modification request from the DCR. I paid the invoice to the Office of Finance, FEBRUARY 11, 2021.

Marissa Garcia
To: Kika Cc: [illegible] Lisa, [illegible]

Hello Kika,

The Office of Finance is aware of your DCR application record LA-C-19-310144-R-APP being eligible for payment appointment scheduling. They likely did not recognize the modification record LA-C-20-000050-MOD you provided, associated with this application. **I am confirming that yes, you may proceed to schedule an appointment for paying this $542 Modification Fee for LA-C-19-310144-R-APP.** I have copied the Office of Finance on this email and they also are aware of your eligibility based on DCR's and OOF's shared records.

With regards to the $597 fee associated with LA-C-20-001566-APP-PREAPP, allow me to investigate this one further. I'll try to respond back to you by the end of day. If you'd like to proceed in making the request with the Office of Finance to schedule your payment appointment for the $542 fee you may, but I understand that you'd probably want to pay both invoices on the same day.

If you would like to contact the Office of Finance to initiate the payment appointment process, you may email them at finance.cannabis@lacity.org with your request. Let them know how you intend to pay the $542 fee (cash, check, money orders, or credit card).

On Wed, Feb 10, 2021 at 9:33 AM Kika Kieth <kika@lifedevelopmentorg.org> wrote:
Good Morning-

[illegible]

LA BUSINESS POSTAL

Application Modification
Payment Eligibility
2/11/21

--
Sincerely,
Marissa Garcia

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION
Marissa Garcia
Management Assistant
Licensing
Department of Cannabis Regulation
221 N Figueroa St, Suite 1245 Los Angeles, CA 90012
T: (213) 978-0738

2/16/2021 - 10:26 AM

CITY OF LOS ANGELES DEPARTMENT OF
CANNABIS REGULATION
221 N. Figueroa Street, Suite 1245
Los Angeles CA, 90012

RECEIVED FEB 16 2021 OFFICE OF FINANCE

** APPLICATION MODIFICATION REQUEST INVOICE **

Invoice Date:	2/16/2021	**BTRC#:**	000321335S-0001-5
Amount Due:	$542.00	**Legal Business Name:**	Perfect Union Crenshaw LLC
Void If not Paid within:	7/26/2021	**Doing Business As:**	
Record Number:	LA-C-19-310144-R-APP	**Premises Address:**	4233 S CRENSHAW BLVD, #A, LOS ANGELES, CA 90008

Tax Id:	Fee Details	Fee Code	Fee Amount
5490	Cannabis License Modification Fee	J0980821	542.00

- [illegible] after the tenth day.
- Payments by cash, check, money order and credit card can be made at the City Hall Office of Finance in person. Mailed payments will not be accepted.
- An appointment to make payment in person at the City Hall public counter is required and must be requested via email [illegible] an appointment does not relieve the Applicant from ensuring payment is made within 10 calendar days. Fees are non-refundable.

Please remit this invoice with payment. Thank you.

Please Make Payment To:
City of Los Angeles
Office of Finance
City Hall
200 N. Spring Street, #101
Los Angeles, CA 90012

Paid Invoice
Application
Modification
2/10/21

FEBRUARY 16, 2021 I provided DCR receipt of payment of invoice for Application Modification Request.

Kika Kieth 2/16/21
To: Marissa, Jason, DCR Cc: Norman, Lisa, James, Kika

Good Morning-
Here is the receipt for the Application Modification Request paid today to the Office of Finance. I would greatly appreciate an expedited review of my documents submitted in order to proceed with my State application filing.

Blessings,
Kika
LA-C-19-310144-R-APP

pdf

80+ Days after submitting my Application Modification Request, the DCR formally acknowledged my application. Still NO PROCESSING yet.

Marissa Garcia 2/16/21
To: Kika Cc: Jason, DCR, Norman, Lisa, James, Kika

Re: App Modification Invoice LA-C-19-310144-R-APP

Hello Kika,

Thank you for informing us. I hope to have your other record, LA-C-20-001566-APP-PREAPP, reconciled soon so that you may proceed with payment appointment for that respective invoice.

Now that your modification request is formally before the department, we will contact you once we are ready to begin processing the request. We appreciate your continued patience. Kindly wait for further communication from the department.

On Tue, Feb 16, 2021 at 8:51 AM Kika Kieth <kika@lifedevelopmentgroup.org> wrote:
Good Morning-
Show Quoted Content

--
Sincerely,
Marissa Garcia

Marissa Garcia
Management Assistant
Licensing
Department of Cannabis Regulation
221 N Figueroa St, Suite 1245 Los Angeles, CA 90012
T: (213) 978-0738

<u>FEBRUARY 24,2021</u> 90+Days I emailed Jason Killeen again expressing my concerns for the DELAYS in processing my Application Modification request. I referenced the DCR's Commission Report acknowledging that I was 1 of 7 out of the 200 Phase 3 Round 1 Applicants to pass all inspections and temporary approval review. I made a specific request for the process, procedures and staff that was assigned to review my application. NO RESPONSE RECEIVED.

Kika Kieth 2/24/21
To: Jason, Marissa, DCR Cc: Norman, James, Lisa, Kika, Kika >

Greetings Jason-
I am writing to express my concern about the processing time for my modification request. It has been well over 100 days since I submitted a complete application with all pertinent supporting documents from the State of California and all Owners of record.

In the Executive Director's report, February 4th- Cannabis Commission meeting, it was stated that only 7 of the 200 Phase 3 Round 1 applicants passed the DCR inspection. Good Times Crenshaw aka Perfect Union Crenshaw was 1 of the 7 that passed the DCR and LAFD inspection at the time of your report. Per my previous communications with DCR analysts, I am unable to receive local authorization until my modification is approved. Immediately upon notification of eligibility to pay modification invoice from the DCR on February 11th, I schedule next available appointment with the Office of Finance and made $542 payment (Invoice 5480) on February 16th. I have followed all required processes and procedures required by LAMC Sec.104.20.

I am requesting a detailed explanation for the DCR's administrative delays in reviewing my application. Which analyst is responsible for the review of my **temporary approval documents**? Who is responsible for the review of my **application modification** request? Who is responsible for the review of my **Equity Share** documents? Please provide dates of initial review of each section.

These delays are creating grave financial hardships to me and my family. I am a single mother who has worked diligently to make business decisions to maintain possession of a $12K per month empty retail property in my community for close to 3 years.

Now, I humbly request you expedite the processing/review of my application for local authorization. I am prepared to submit my state application and apply pressure for expedited review through their Cannabis Equity Unit as well I, so I can open the doors to my community. With the nearest compliant storefront over 1.5 miles, it is a public necessity for my essential business to serve the health needs of my neighborhood.

I have presented our Storefront Model and have received the support of Empowerment Congress West Neighborhood Council, Park Mesa Neighborhood Council, the South Los Angeles Alliance of Neighborhood and H.O.P.E. Thank you for your swift consideration.

Blessings,
Kika

See attached verification of Police Alarm Permit for Good Times Crenshaw aka Perfect Union Crenshaw (LA-C-19-310144-R-APP) located at 4233 Crenshaw Blvd.

MARCH 14, 2021 **3rd Attempt to email Jason Killeen and Cat Packer after waiting 18-days with NO RESPONSE from Jason Killeen.**

Kika Keith 3/14/21
To: cat.packer@lacity.org Cc: Jason, Marissa, DCR, Norman, James, Lisa & 2 more...

Greetings Cat and Jason-
Please see my **3rd email** sent on 2/24/21 below, regarding my Application Modification review that is holding up my letter for local authorization. I have not received a response back and it has been **18 days** since I sent this email. It has been **39 days** since I passed my DCR and LAFD inspections.

Once again, I submitted my application modification (LA-C-20-000050-MOD) request on **10/21/20** with all necessary supporting documents. It has been **144 days** since I submitted. According to the Executive Directors Report on February 4th, Application Modifications are to take **up to 130 days** to be reviewed. I need IMMEDIATE attention and review of my application. I have passed ALL inspections and Temporary Approval submissions! These delays are causing unnecessary hardships! Please address immediately.
Thank you for your expeditious response.

Blessings,
Kika

On Feb 24, 2021, at 11:33 PM, Kika Kieth <kika@lifedevelopmentgroup.org> wrote:

See More

MARCH 23, 2021 **4th Attempt to email Jason Killeen and Cat Packer in 30-days with NO RESPONSE**

Kika Keith 3/23/21
To: cat.packer@lacity.org Cc: Jason, Marissa, DCR, Norman, James, Lisa, Kika

Re: IMMEDIATE ATTENTION REQUIRED- LA-C-19-310144-R-APP

Good Morning!
This is my 4th email, in the past month and I have not had a response back.

On Mar 14, 2021, at 9:14 PM, Kika Keith <lifedevelopmentgroup@gmail.com> wrote:

Greetings Cat and Jason-
Please see my **3rd email** sent on 2/24/21 below, regarding my Application Modification review that is holding up my letter for local authorization. I have not received a response back and it has been **18 days** since I sent this email. It has been **39 days** since I passed my DCR and LAFD inspections.

Once again, I submitted my application modification (LA-C-20-000050-MOD) request on **10/21/20** with all necessary supporting documents. It has been **144 days** since I submitted. According to the Executive Directors Report on February 4th, Application Modifications are to take **up to 130 days** to be reviewed. I need IMMEDIATE attention and review of my application. I have passed ALL inspections and Temporary Approval submissions! These delays are causing unnecessary hardships! Please address immediately.
Thank you for your expeditious response.

Blessings,
Kika

MARCH 25, 2021 5th Attempt- Emailed DCR Analyst after NO RESPONSE from Jason Killeen or Cat Packer.

Kika Keith 3/25/21
To: Marissa Garcia >

Good Morning Marissa-
I have sent multiple emails with no response to the entire team. I am humbly requesting an expeditious review of my application modification.
Blessings,
Kika

My DCR Analyst finally responded, apologized for the delay and informed me the DCR has a minimum of 120-days to review my Application Modification beginning 2/17/21. As of 3/25, my application was submitted in November 2020, over 120-DAYS already.

Marissa Garcia 3/25/21
To: Kika Keith >

Good evening Kika,

I apologize for the delay in response. I understand that in order to be granted your Local Compliance Underway Letter, your Application Modification Requests must first be processed and effectuated. DCR anticipates the initial review of an applicant's modification request to take a minimum of 120 days. Please note that this process does not begin until an application is filed which begins when the application is submitted and related invoices paid. Your modification request was deemed filed on 2/17/2021. I'm sorry that I cannot provide you with better news but that is currently the status of your application at this time.

On Thu, Mar 25, 2021 at 7:25 AM Kika Keith <lifedevelopmentgroup@gmail.com> wrote:
Good Morning Marissa-
I have sent multiple emails with no response to the entire team. I am humbly requesting an expeditious review of my application modification.
Blessings,
Kika

--
Sincerely,
Marissa Garcia

Marissa Garcia
Management Assistant
Licensing
Department of Cannabis Regulation
221 N Figueroa St, Suite 1245 Los Angeles, CA 90012
T: (213) 978-0738

See More

APRIL 11, 2021 Checked on status of Application Modification after waiting over 130-days since applying.

Kika Keith 4/11/21
To: Marissa, DCR >

Good Evening-
I am checking on the status of my Application Modification. After listening to the most recent Commission Meeting, Jason Killeen stated that payment is required for each modification request. I only received one invoice for my modification request. My cover sheet list ownership structure and legal entity Name change, should I have received two invoices to pay for each requested modification? Please advise

> On Mar 25, 2021, at 8:32 PM, Marissa Garcia <marissa.garcia@lacity.org> wrote:

See More

APRIL 28, 2021 Emailed ANOTHER request for status of my Application Modification.

Kika Keith 4/28/21
To: DCR Cc: Marissa, Jason >

Good Morning Marissa!
Are there any updates on the status of my application modification? I am unable to plan my business rollout, hiring, etc., without having a clue about the timing of review of my modifications. Please provide some type of timeline.
Thanks,
Kika

> On Apr 12, 2021, at 5:11 PM, DCR Licensing <dcrlicensing@lacity.org> wrote:

See More

APRIL 29, 2021 DCR still cannot provide any status report of my Application Modification request- 145+ Days

Marissa Garcia 4/29/21
To: Kika Cc: DCR, Jason

Good Morning Kika,

At this moment, I do not have a good sense of when exactly your specific modification requests will be processed. An update will be provided when we have one.

On Wed, Apr 28, 2021 at 6:26 AM Kika Keith <lifedevelopmentgroup@gmail.com> wrote:

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Department of Cannabis Regulation
221 N Figueroa St, Suite 1245 Los Angeles, CA 90012
T: (213) 978-0738

--
Sincerely,
Marissa Garcia

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION

Marissa Garcia
Management Assistant
Department of Cannabis Regulation
221 N Figueroa St, Suite 1245 Los Angeles, CA 90012
E: marissa.garcia@lacity.org

See More

MAY 19, 2021 DCR still has not provided any status report of my Application Modification request- 165+ Days

Kika Keith 5/19/21
To: Marissa Cc: DCR, Jason, Kika

Hello Marissa and Jason-
It's been another month, please provide me an update on the status of my application modification. As a reminder, my application modification was submitted in October of 2020, I was approved for local compliance underway in February 2021 but was not able to move forward due to the need for an approved modification of my business name and owners. I received my invoice from the DCR in February and paid it in 3 days.
I am in need of a detailed status update for my application modification so that I can properly prepare and budget based on status report.
Thank you for your immediate attention.
Blessings,
Kika

On Apr 29, 2021, at 8:55 AM, Marissa Garcia <marissa.garcia@lacity.org> wrote:

See More

As of JUNE 1ST, THE DCR HAS TAKEN 109 DAYS TO REVIEW MY APPLICATION MODIFICATION REQUEST AND OVER 230 DAYS FROM THE DAY OF APPLICATION MODIFICATION SUBMISSION TO THE DCR VIA ACCELLA.

TEMPORARY APPROVAL PROCESS BACKGROUND

Application Invoice Receipt 9/30/20

September 2020, I paid $9075 Application fee for Phase 3 Retail Storefront located at 4233 Crenshaw Blvd.

9/30/2020 - 4:45 PM

$PAID

CITY OF LOS ANGELES DEPARTMENT OF
CANNABIS REGULATION

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

Updated - Phase 3 Retail Round 1 Los Angeles Municipal Code Section 104.06.01(b)(7)

Social Equity Individual Applicant:	Haidka Keith-Sturgis	**ACA Reference Contact ID Number:**	317258518
Invoice Date:	Tuesday, September 22, 2020	**BTRC #:**	
Amount Due:	$9,075.00	**Legal Business Name:**	Perfect Union Crenshaw LLC
Void if not Paid by:	Friday, October 2, 2020	**Doing Business As:**	
Record Number:	LA-C-19-310144-R-APP	**Premises Address:**	4233 Crenshaw BLVD, #A, LOS ANGELES, CA 90008

Medical Cannable Activities:
Medical Retail (J010)

Adult-Use Cannable Activities:
Adult-Use Retail (J020)

Inv Id:	Fee Details	Fee Code	Fee Amount
3634	Cannabis Phase 3 Retail Storefront Application Fee	J301	8,059.00
3634	Fire Cannabis Inspection Fee	F100	1,016.00

- This invoice is only valid until Friday, October 2, 2020. Application fees must be paid within ten days of the Invoice Date.
- All unpaid Applications will be deemed abandoned after the tenth day in compliance with the Los Angeles Municipal Code.
- If the Applicant does not have an existing Business Tax Registration Certificate (BTRC), then a completed Business Tax Application must be submitted with payment. At the request of the Social Equity Individual Applicant, DCR will provide an updated invoice naming the Legal Business Entity associated with the original Application. A BTRC must be registered to the Social Equity Individual Applicant or the Legal Business Entity identified in the original Application. Click here for more information regarding registering for a BTRC.
- 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 at the City Hall public counter must be requested via email (finance.cashier@lacity.org) by Friday, September 25, 2020. Failure to request an appointment by Friday, September 25, 2020 does not relieve the Applicant from ensuring payment is made on or before Friday, October 2, 2020.
- Payment of Application fees does not guarantee licensure. Application fees are non-refundable.
- Once your Application fees are paid, DCR will update your Accela record status to "Awaiting Data Entry"

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

Phase 3 Round 1 Retail
Application Paid Invoice
9/30/20

Temporary Approval Application Approved 12/31/20

December 2020, the DCR approved my Temporary Approval Application, granting me authority to move forward with Virtual Inspection.

From: DCR Licensing
To: Kika Keith
Cc: Marissa Garcia
December 31, 2020 at 4:38 PM

Dear Kika,

Your application has met the requirements to qualify for a virtual inspection. Please review the inspection checklist to anticipate what we will be looking for and visit this page to learn more information regarding the virtual inspection process.

When you are ready, please be sure to reply to this email with your **inspection availability** by **providing at least three dates (Mon-Thurs)** and **times (between 10:00 AM - 2:00 PM)**

Congratulations on your progress Kika. May you have a blessed and safe New Year's Eve!

Kind regards,

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION
Licensing Team
Department of Cannabis Regulation
City of Los Angeles
213-978-0738

Temporary Application Approval
12/31/20

PASSED DCR & LAFD INSPECTIONS 2/3/21

February 2021, I passed both the DCR and LAFD inspections. Provided all additionally requested documentation by 2/6/2020.

DCR Licensing
To: Kika Cc: [illegible]

Dear Kika,

Congratulations on passing both your Phase 3 Retail Round 1 (P3RR1) DCR Inspection and LADF Inspection! As previously mentioned, DCR continues to review your Equity Share documents to determine completeness so that we may issue you your "Local Compliance Underway" letter however we must also process your Modification Request. While that occurs, I'll be requesting further documents needed for Temporary Approval review.

- **Temporary Approval Attestation** ([illegible])
- **Security Plan** BCC Form *although you previously submitted a security plan with your initial application submission from Sept 2019, kindly resubmit using the specified form*
- **Social Equity Program - Owner Compliance Attestation** ([illegible]) *you previously submitted this on LIC-4011-FORM; I apologize but the form has since been updated so we'll need all owners to fill out the revised 6001 form*
- **Certificate of Occupancy from Dept. of Building & Safety** *I'm aware from our previous emails that you're working your hardest at obtaining this.*

Please "reply all" to this email, to ensure that I am copied on the correspondence. Let me know if you have any questions or concerns, or simply to let me know once you have uploaded all documents to the DCR Application Portal. This way, I will know to review the documents.

Thank you Kika! Great progress thus far.

Passed DCR Inspection
Passed LADF Inspection
2/3/21

Kind regards,

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION
Licensing Team
Department of Cannabis Regulation
City of Los Angeles
213-978-0738

Receipt of Additional Temporary Approval Review Documents Requested

Temporary Approval Attestation Form 4010

From: Kika Keith
To: DCR Licensing , Kika Keith > Marissa Garcia ,
February 6, 2021 at 7:22 PM

LA-C-19-310144-R-APP Form 4010 H.Keith-Sturgis

Per your request see attached notarized Form 4010.

Blessings,
Kika
LA-C-19-310144-R-APP

--
Sent with Genius Scan for iOS.
https://dl.tglapp.com/genius-scan

Receipt of Additional Docs
Temporary Approval Attestation
(H.Keith-Sturgis)
2/6/21

pdf

Temporary Approval Attestation

License/Application No. LA-C-19-310144-R-APP

I attest that the information provided in this Temporary Approval Attestation Form is true, correct, and complete as of the date of my signature below. I have the authority to make the attestations contained within this form on behalf of the Applicant Entity identified above. I understand that submission of false or misleading information or the failure to disclose material facts may result in denial of the application.

Hakika Keith Sturgis — Owner
Print Name — Title

Hakika Keith-Sturgis — 2/4/21
Signature — Date

Temporary Approval Attestation Form 4010 (H.Keith-Sturgis) 2/6/21

NOTARY ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On 2/4/2021 before me, Myra Alcastro Notary Public (insert name and title of the officer) personally appeared Hakika Sturgis, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under penalty of perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature (Seal)

MYRA ALCASTRO
Notary Public - California
Los Angeles County
Commission # 2251879
My Comm. Expires Aug 4, 2022

Security Plan Form BCC-LIC-018

From: Kika Keith
To: DCR Licensing , Kika Keith > Marissa Garcia
Cc: Kika Keith
Bcc: james@lifedevelopmentgroup.org ,
February 7, 2021 at 3:28 PM

LA-C-19-310144-R-APP BCC LIC-018 Security Plan

Please see attached form BCC LIC-018 Security Plan, per your request.
Blessings,
Kika
LA-C-19-310144-R-APP

Receipt of Additional Docs
Form BCC LIC-018
2/7/21

pdf

b. How the applicant will ensure the alarm system remains operational, including the frequency of maintenance checks by the alarm company.

The alarm system will be programmed to notify the third-party security provider that will notify the General Manager, or its authorized assignee, in the event of a breach. If unavailable, law enforcement will be contacted. The General Manager will be responsible for ensuring the alarm system and panic buttons are in proper working order, and the system will be tested bi-annually, or as recommended by the security contractor.

c. A description of the alarm system features, including whether it has motion detection sensors inside the premises

Motion detectors will be placed within multiple strategic locations. At least one panic button will be installed and available for employees to access. The button will be placed within reach of personnel as recommended. Once pressed, the panic button will immediately send text and email alerts to all parties involved and alert the central station. The General Manager will be responsible for ensuring the alarm system and panic buttons are in proper working order and the system will be tested bi-annually, or as recommended by the security contractor.

d. A description of how an alarm will be responded to, including whether law enforcement personnel will be notified.

The alarm system will be programmed to notify the third-party security provider that will notify the General Manager, or its authorized assignee, in the event of a breach. If unavailable, law enforcement will be contacted. Upon request Management shall make all information related to security alarm systems monitoring and alarm activity available to the regulatory body

e. A description of how licensees will be sharing the alarm system with other licensees (when sharing services at the same location), if applicable

NOT APPLICABLE

Applicant Signature — 2/4/2021 Date Signed 1-21-2021

Security Plan
Form BCC-LIC-018
2/4/21

BCC-LIC-018 (Rev 10/14) — Page 5 of 5

Receipt of Additional Temporary Approval Review Documents Requested (cont.)

Owner Compliance Attestation Form 6001

Kika Kieth
To: DCR, Kika, Marissa

2/6/21

LA-C-19-310144-R-APP SEP-6001 H.Keith-Sturgis

Per your request see attached notarized Form SEP-6001 H.Keith-Sturgis.

Blessings,
Kika
LA-C-19-310144-R-APP

Receipt of Additional Required Docs
Form 6001
2/6/21

pdf

Form SEP-... Sturgis.pdf
1.2 MB

Application/License No. LA-C-19-310144-R-APP

I further acknowledge and understand that DCR's review of business documents for Social Equity Applicants and the Social Equity Program eligibility and compliance is for its licensing purposes only and it shall not constitute or be construed to be any official form of certification and/or legal proclamation concerning the Owners, third parties, and/or their rights between and amongst each other.

I declare under the penalty of perjury under the laws of the State of California that the information presented in this form and its attachments are true and correct to the best of my knowledge. I have the authority to make the attestations contained within this form related to the property listed above.

Owner or Agent's Signature — Date: 2/4/21
Halicka Keith Sturgis — Owner
Individual's Name — Title
Name of Owner Entity (if applicable)

Form 6001 Ownership Attestation (Halicka Sturgis)
2/4/21

NOTARY ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On 2/4/2021 before me, Maria Castro, Notary Public (insert name and title of the officer) personally appeared Harold Sturgis
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under penalty of perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.
Signature (Seal)

MARIA CASTRO
Notary Public - California
Los Angeles County
Commission # 2258698
My Comm. Expires Aug 4, 2024

SEP-6001 FORM (rev 10.29.2020) Page 2 of 2

From: Kika Kieth
To: DCR Licensing, Kika Keith, Marissa Garcia
Cc: Kika Keith
February 7, 2021 at 11:04 AM

LA-C-19-310144-R-APP FORM 6001- Norman Yousif

Per your request, see attached Form 6001 for Owner, Norman Yousif.
Blessings,
Kika
LA-C-19-310144-R-APP

Receipt of Requested Docs
Owner Compliance Attestation
Form 6001
2/7/21

pdf

2021-02-07 10-26.pdf
1.1 MB

SEP – Owner Compliance Attestation
Application/License No. LA-C-19-310144-R-APP

I further acknowledge and understand that DCR's review of business documents for Social Equity Applicants and the Social Equity Program eligibility and compliance is for its licensing purposes only and it shall not constitute or be construed to be any official form of certification and/or legal proclamation concerning the Owners, third parties, and/or their rights between and amongst each other.

I declare under the penalty of perjury under the laws of the State of California that the information presented in this form and its attachments are true and correct to the best of my knowledge. I have the authority to make the attestations contained within this form related to the property listed above.

Owner or Agent's Signature — Date: 2-5-2021
Norman Yousif — Owner
Individual's Name — Title
Name of Owner Entity (if applicable)

Owner Compliance Attestation
(Norman Yousif)
2/5/21

NOTARY ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On Feb. 5, 2021 before me, Mary Burns, Notary Public (insert name and title of the officer) personally appeared Norman Nazir Yousif
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under penalty of perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.
Signature (Seal)

MARY BURNS
COMM. #2219225
Notary Public - California
San Diego County
My Comm. Expires Nov. 11, 2021

Receipt of Additional Temporary Approval Review Documents Requested (cont.)

Certificate of Occupancy

From: DCR Licensing
To: Kika Kieth
Cc: Marissa Garcia > Kika Keith > Norman Yousif Jason Killeen
March 3, 2021 at 6:15 AM

Re: LA-C-19-310144-R-APP Certificate of Occupancy 4233 Crenshaw

Hello Kika,

Thank you kindly. The Certificate of Occupancy has been received and I've updated your Accela record with the document as well.

Kind regards,

CITY OF LOS ANGELES DEPARTMENT OF CANNABIS REGULATION

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

Receipt of Certificate of Insurance
3/3/21

MARQUEECE HARRIS-DAWSON
Councilmember, Eighth District

September 1, 2017

Dear Colleagues,

As public servants of the City of Los Angeles, we are committed to building a just, equitable, and thriving city. Together, with the residents we serve, we embark on a historic process to construct the framework of a new industry. Facilitating the nation's most lucrative commercial cannabis market which may dramatically reshape the landscape of our city.

Even as we stand on this precipice, we must recognize that we stand squarely in the shadow of the unjust War on Drugs. This atrocity targeted Angelinos of color, decimated neighborhoods, ripped families apart, and criminalized the illness of addiction. Today, we have an opportunity to build new systems and shape an industry in ways that recognizes wrongs, respect all residents, and intentionally builds a more equitable society.

THE WAR ON DRUGS

Beginning in 1971, President Nixon declared drugs as one the biggest existential threats to the United States. This declaration set us on a failed path to spend over one trillion dollars, arrest over 40 million people, and destroy countless families and neighborhoods, particularly in communities of color.[1] Experts agree, this War disproportionately targeted black and Latino families. Today, 80 percent of people federally incarcerated for drug offenses are black or Latino.[2]

Angelinos are not exempt from these racially-biased practices. Despite the reality that black young people use cannabis and lower rates than and white young people, black Angelinos are

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[1] American Civil Liberties Union (2013). *The War on Marijuana in Black and White*. Retrieved from: https://www.aclu.org/sites/default/files/field_document/1114413-mj-report-rfs-rel1.pdf

[2] Drug Policy Alliance (2016). *The Drug War, Mass Incarceration and Race*. Retrieved from: http://www.drugpolicy.org/sites/default/files/DPA%20Fact%20Sheet_Drug%20War%20Mass%20Incarceration%20and%20Race_%28Feb.%2020016%29_0.pdf

arrested for marijuana possession at seven times the rate of whites.[3] This rate is higher than the cities of San Bernardino, Fresno, and Bakersfield.[4]

IMPLICATIONS

The consequences for drug-related convictions far and away surpass the gravity of the individual crimes. For decades, people convicted of simple possession faced a lifetime of barriers, many nearly impossible to overcome. The challenges posed to these populations include:

- Denial of business loans, professional licensing, employment, and financial aid make it impossible for individuals to progress economically.
- The **disenfranchisement** of people with felony convictions denies nearly 8 percent of black people of voting age the right to vote.[5]
- Mass incarceration led to nearly 3 million children to live in households where one or more parent is incarcerated, including one in nine black children and one in 28 Latino children compared to one in 57 white children.[6] Additionally, up to 20% of children in the foster care system have an incarcerated parent.[7]

These are not minor inconveniences, there are the systematic dispossession of our fellow Americans rights, livelihood, families, and communities.

THE SHAME OF LOS ANGELES

Los Angeles leadership also enabled the infrastructure that facilitated and drove the underground economy. This included the over-concentration of liquor stores, the disinvestment in infrastructure, unregulated vacant homes and structures, and policing strategies that alienated residents instead of collaborating with them. This benign neglect and government sanctioned aggression contributed to the all too violent neighborhoods, a thriving gang culture, and the over-concentration of negative land-uses. We can take responsibility for the actions of our predecessors, we can restore the trust of residents, and we can begin to right these wrongs.

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[3] CA NAACP & Drug Policy Alliance (2010), *Arresting Blacks for Marijuana in California*. Retrieved from: http://www.drugpolicy.org/docUploads/ArrestingBlacks.pdf

[4] CA NAACP & Drug Policy Alliance (2010), *Arresting Blacks for Marijuana in California*. Retrieved from: http://www.drugpolicy.org/docUploads/ArrestingBlacks.pdf

[5] Drug Policy Alliance (2016) *The Drug War, Mass Incarceration and Race*. Retrieved from: http://www.drugpolicy.org/sites/default/files/DPA%20Fact%20Sheet_Drug%20War%20Mass%20Incarceration%20and%20Race_%28Feb.%202016%29_0.pdf

[6] Drug Policy Alliance (2016) *The Drug War, Mass Incarceration and Race*. Retrieved from: http://www.drugpolicy.org/sites/default/files/DPA%20Fact%20Sheet_Drug%20War%20Mass%20Incarceration%20and%20Race_%28Feb.%202016%29_0.pdf

[7] Rutgers University (2014) *Children and Families ff the Incarcerated Fact Sheet*. Retrieved from: https://nrcfcfi.camden.rutgers.edu/files/nrcfcfi-fact-sheet-2014.pdf

TWO DECADES OF CHANGE

In 1996, Californians legalized medical cannabis, kicking off two decades of conversations about the role of cannabis in the Golden State. In the succeeding years, Angelinos voted to expand and regulate cannabis. From Proposition D and Measure M at the city level and Proposition 64, [illegible]

Today, we are facilitating the creation of an industry that will allow people to make significant sums of money based on the exact same product that we arrested 40 million Americans, mostly Americans of color.[8]

THE OPPORTUNITY ON OUR DOORSTEP

Understanding the historic nature of the process we are undertaking, and taking into account our history, I believe that now is the time to create an equity-driven cannabis industry that protects neighborhood continuity. On August 18, 2017, I introduced 6 motions and resolutions to that [illegible] neighborhood council leaders, the faith community, substance abuse prevention activists, and an interactive telephone town hall with over 2,500 South Los Angeles residents.

1. Establish a **pilot program** for cannabis-related businesses within the City of Los Angeles [illegible] can include a social equity opportunities coordinator (SEOC), a small business incubator, quality community outreach, and facilitating innovative business models that support women and people of color, like cooperative ownership.
2. [illegible] weigh-in on location and operations of new cannabis business.
3. Create a **Neighborhood Health Fund** that offers small grants to programs that (1) improve resident life outcomes and (2) address the roots of prevention and healthy [illegible]
4. Create a **worker retention** program, modeled after the successful LAWA WRO, to protect workers when there is a change in ownership.
5. Advocate at the state level to combat end criminalization by eliminating all loopholes, including the **loophole that punishes 18-20 year-olds** for simple possession.

I will also introduce at least one additional motion to establish a Social Equity Program that includes tiered applications for licensing that prioritizes the residents most impacted by the legacy of the War on Drugs.

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[8] American Civil Liberties Union (2013). *The War on Marijuana in Black and White*. Retrieved from: https://www.aclu.org/sites/default/files/field_document/1114413-mj-report-rfs-rel1.pdf

I look forward to working with my colleagues to put into practice our shared values of equity and justice and using the power of the City to create a just cannabis industry.

Sincerely and with hope,

Marqueece Harris-Dawson
Councilmember, 8th District