

LOS ANGELES POLICE COMMISSION

BOARD OF POLICE COMMISSIONERS

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February 11, 2025

BPC #25-032

The Honorable City Council
City of Los Angeles, Room 395
c/o City Clerk's Office
Los Angeles, CA 90012

Dear Honorable Members:

RE: CITY COUNCIL FILE NO. 24-1127, REVIEW OF POLICE COMMISSION PERMITS.

At the regular meeting of the Board of Police Commissioners held Tuesday, February 4, 2025, the Board APPROVED the Department's report relative to the above matter.

This matter is being forwarded to you for approval.

Respectfully,

BOARD OF POLICE COMMISSIONERS

A handwritten signature in blue ink, appearing to read "Rebecca Munoz".

REBECCA MUNOZ
Commission Executive Assistant

Attachment

c: Chief of Police

INTRADEPARTMENTAL CORRESPONDENCE

January 31, 2025

1.0

TO: The Honorable Board of Police Commissioners

FROM: Executive Director, Board of Police Commissioners

SUBJECT: RESPONSE TO CITY COUNCIL FILE NO. 24-1127, REVIEW OF
POLICE COMMISSION PERMITS

RECOMMENDED ACTION

That the Board of Police Commissioners **APPROVE** the Executive Director's report and **TRANSMIT** to City Council.

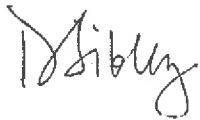
DISCUSSION

On October 15, 2024, the Honorable City Council adopted a motion from the Public Safety Committee requesting that the Board of Police Commissioners "report back on an overview of all business types that require a Police Permit for operation," and "report back with recommendations on the permits in which the regulatory benefit of a police permit has diminished and no longer seems necessary."

Commission Investigation Division has completed a review of all police permits currently required. In total, twenty-six permit types were identified for which the regulatory benefit of a police permit has diminished and no longer seems necessary.

Should you have any questions, please do not hesitate to contact me at (213) 236-1400.

Respectfully,



DJANGO SIBLEY, Executive Director
Board of Police Commissioners

BOARD OF
POLICE COMMISSIONERS
Approved *February 4, 2025*
Secretary *Rebecca Munoz*

LOS ANGELES POLICE COMMISSION

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January 31, 2025

CF # 24-1127

The Honorable City Council
City of Los Angeles, Room 395
c/o City Clerk's Office
Los Angeles, CA 90012

Dear Honorable Members:

On October 15, 2024, the Honorable City Council unanimously supported the Public Safety Committee's request that the Board of Police Commissioners (Board) review regulatory police permits within their purview. This effort revealed useful information suggesting that Council action could eliminate a variety of outdated permits and amend others, allowing staff to focus resources in a more efficient and effective manner.

Permitting is an essential component of municipal government. Carefully crafted regulations allow commercial enterprises to operate in a manner that promotes public safety, limits opportunities for criminal activity, enhances consumer protection, and promotes accountability. Periodic review of Los Angeles' police permitting framework is essential to ensure that our city government's regulatory system remains relevant and effective.

The Council is encouraged to implement the following concepts to ensure the relevance and effectiveness of the permitting process:

Planning (timeliness) – The Board regularly receives last-minute permit applications for major events, with applicants expecting permits to be issued in as little as a week. Such compressed timelines challenge the Board's capacity to ensure a complete review of the applications and of the public safety issues associated with the proposed events. Appropriate application timeline requirements should be established to cover all City Departments involved in the permitting process.

Recommendation: Direct the City Attorney to work with stakeholders to identify and codify appropriate timelines across all departments involved in permitting.

Accountability – Police permitting personnel conduct a thorough background investigation to ensure that the individuals holding events in the City are properly-vetted, legitimate operators who will be accountable to their clientele and the City of Los Angeles. The Board has noted a significant uptick in “straw” applications in which the actual commercial beneficiaries are unidentified, limiting the Board’s ability to perform appropriate vetting.

Resource Management – At the core of most police permits is either public safety or crime prevention. Permitting obligations should function to enhance public safety and suppress potential criminal activity. When deemed appropriate by the Board, permittees should be required to maintain a current safety plan (to be reviewed and renewed annually), which will identify security and medical services span of control; coordination with fire, police, and other appropriate public safety entities; emergency management team and resources; business or event layout; primary financial beneficiaries; transparent and complete contact information; verification of proper permits (such as Certificate of Occupancy, Temporary Special Event permits, and fire permits, etc.); and liability references (e.g., proof of insurance).

Recommendation: Direct the City Attorney to amend the Municipal Code to require a safety plan in a format established and approved by the Board.

Infrastructure cohesion – Established and effective intra-departmental communication among involved City entities is essential to a solid regulatory infrastructure. The city experiences ongoing financial and political pressures as well as innovative efforts to discover and exploit loopholes within the regulatory framework – such efforts can be eliminated through an established chain of communication between City Departments. Moreover, the city’s regulatory framework is only as strong as that of its weakest departments. The Council must demand accountability and legitimacy from all involved Departments.

Recommendation: Direct the following Departments: Fire, Police, Building & Safety, and Transportation, as well as Street Services, the Office of Finance, and any other relevant departments to identify key representatives involved in the issuance of permits, to publish a list of such individuals for information sharing among Departments, and to mandate regular meetings that promote effective communication and coordination to improve the permit issuance process.

Commercial Public Gatherings

The City of Los Angeles regularly hosts large and high-profile events. Typically, these events occur with little or no public safety disruption. However, the risk of tragedy at major events is elevated when such events are not properly regulated or when shortcuts or loopholes within the existing regulatory system are exploited.

Every year worldwide, thousands of people are injured, and some even die while attending concerts and other large public gatherings. Meanwhile, many others fall victim to crimes such as sexual assault, battery, and theft. Proper regulation and accountability within the code may not be able to eliminate all such instances but can significantly reduce the risk of such occurrences.

Police Permitting Assessment

Commission Investigation Division, as the regulatory arm of the Board of Police Commissioners, has conducted an extensive review of 65 permits within their purview and makes the following recommendations to allow staff to narrow their focus regarding the industries that present the most significant public safety, crime suppression, or consumer protection concerns:

One-Night Public Dance – has remained unchanged for over sixty years and poses a significant public safety risk. Such events are open to the public (concerts, festivals, block parties), usually occurring in spaces not designed for such events (streets, parking lots, etc.), and often include alcohol sales. It is strongly recommended that the “One-Night Public Dance” be replaced with a broader “Non-Recurring Special Event” permit with a significant focus on public safety and catastrophe prevention. For such events, a safety, transparency, accountability, and resources (STAR) plan should be submitted following the format established by the Board.

Currently, most unpermitted events continue without police intervention (or in many cases) knowledge that the event is unpermitted. This is further exacerbated by the confusing landscape of permits involving the assembly of large crowds. Although a violation of an unpermitted event could technically result in its closure, this action is rarely taken due to the magnitude of resources needed to close such an event. Instead, an administrative fine is sometimes issued, but it is less than the cost of the permit (if any enforcement is achieved at all).

Recommendation: Direct the City Attorney, in consultation with the Commission Investigation Division and other stakeholders, to amend the code to effectively identify special events that have a significant public safety component and require a “Non-recurring Special Event” permit and a safety plan, as described above.

Recommendation: Amend the fine within the code to be adequately punitive and, as necessary, apply criminal penalties to discourage event organizers from proceeding with unsanctioned events. Associated fines must carry sufficient weight, so they are not merely considered to be the “cost of doing business.”

Café Entertainment and Shows Permit – The permit should consider all forms of commercial entertainment, including disc jockeys or other performers. It should be clarified that venues used for their intended purpose (such as concert venues, etc.) shall be required to possess such a permit and shall be responsible for submitting an annual STAR plan following the format established by the Board.

Recommendation: Direct the City Attorney to work with Commission Investigation Division to eliminate confusion within the code, maximize public safety, ensure precise application, and promote transparency (between the Board and applicants).

Carnival Permits – Much like a one-night dance, Carnival permits aptly identify oversight concerns and the Board’s interest in ensuring an adequate span of control over large gatherings

of individuals. Paradoxically, the section allows a permit exemption for religious, charitable, and educational institutions. It is acknowledged that commercial interests generally pose the most significant public safety concerns (since maximizing profits can, and often does, supersede public safety interests); nevertheless, “benevolent” carnival operators (conducting only a single event annually) generally lack essential public safety planning expertise that benefits the community at large.

Recommendation: Direct the City Attorney to amend the code to eliminate an exemption for benevolent organizations. Consideration may be given to waiving the associated permit fees, but the permit serves an essential public safety function that should not be ignored.

Pool halls – Billiards or similar cue sports are played by a diverse group of individuals. The sport has evolved dramatically over the years since it was first regulated in Los Angeles in the late 1950s. Since then, most pool halls have been subject to consumer demand, and those that attract raucous crowds and gambling may do so at the expense of a more “family-friendly” environment.

Recommendation: Direct the City Attorney to amend the pool hall regulations to only require a permit for establishments that (1) have one or more pool tables, (2) serve alcohol, and (3) restrict the admission of minors.

Bath and Tanning Salons – Although bath and tanning salons still require oversight within the “bath” portion of this section due to concerns regarding prostitution and other lewd conduct, the removal of references to “sun” or “light” baths (tanning salons) seems appropriate since there is minimal concern regarding public safety or crime suppression in this industry.

Recommendation: Direct the City Attorney to amend the code to eliminate references to tanning salons.

Valet Parking Operations – Under current law, there is some confusion surrounding valet parking operations since some are indefinitely associated with established businesses, and others are for singular events or are transitory in nature (special events valet).

Recommendation: Amend and expand the code to differentiate between non-recurring (or temporary) parking valet arrangements from those that have an established and regularly recurring operation.

Tow Unit Operations - Los Angeles has a significant problem with predatory tow companies. Commission Investigation Division regularly receives public complaints from unsuspecting Angelenos who have fallen victim to a tow scam. Their vehicle is held until they surrender thousands of dollars in inflated towing and storage costs. Often, these costs are passed onto their insurance companies, driving insurance rates higher. The Council should contemplate meaningful legislation and enforcement “tools” for added consumer protection and regulatory effectiveness. Most “bandit” tows merely pass the costs of citations on to the unsuspecting members of the public that fall prey to their predatory schemes.

Recommendation: The Council should enact legislation to criminalize predatory towing, authorize the Police Department to seize the tow trucks of individuals engaging in unpermitted tow operations, and establish significant administrative penalties upon evidence of excessive impound and storage charges.

Massage Establishments - Prostitution and other illicit conduct remain a significant issue with some massage establishments across the City. Regulatory oversight is frequently confounded by clouded corporate ownership in which longstanding operators engage in an extensive “shell game” of control, making it difficult to determine accountability and implement meaningful enforcement

Recommendation: Direct the City Attorney and Police Department to explore additional enforcement and administrative mechanisms to ensure corporate transparency and accountability.

Hotels and Short-term Rentals – The administrative resources that would need to be expended to gain compliance from the overwhelmingly cooperative (and self-regulated) lodging industry militates against effective enforcement against a limited number of intentionally elusive “bad actors.” Even once these individuals are identified, the fundamental issues to be addressed by the Responsible Hotel Ordinance (RHO) permit are nuisance-related crimes or labor law violations that are better handled through other enforcement mechanisms (See prior responses from Commission Investigation Division and the Board under CF No. 22-0822-S2).

The imposition of responsibility for regulating hotels and short-term rentals on the police department diverts scarce resources away from more pressing public safety concerns. Further, the burgeoning resources deployed to enforce the similar Home Sharing Ordinance (HSO) currently call for around fifty Department of City Planning and Department of Housing officials, suggesting overwhelming administrative challenges and assured redundancy in the Police Department’s efforts to replicate the existing model developed by these Departments. The establishment of a multi-disciplinary office to focus on permitting and enforcement for both the RHO and the HSO would drastically streamline City resources and improve cross-department communication and efficiency without unduly impacting public safety.

Recommendation: The city should create a multidisciplinary team of professionals from Planning, Housing, Police, Fire, and Building and Safety and combine the HSO and RHO efforts.

Junk dealer and Auto part dealer – Although regulation of secondhand sales should be scaled back (as indicated below in recommendations for repealing permits), the City maintains a legitimate need to continue to regulate both junk dealers and auto part dealers, especially due to the proliferation of stolen automobile components and other metals.

Recommendation (consolidate): To simplify the code and focus permitting and enforcement efforts, it is recommended that these two sections be consolidated.

De-regulation of obsolete permits

To enact sweeping reform of the regulatory process, CID recommends that the council repeal twenty-six permits. Many of these permits are antiquated or loosely enforced and provide limited public safety returns for the resources invested in them. It is essential to narrow the Commission’s permitting focus to direct resources where they are needed most for the purpose of promoting public safety.

Recommendation (repeal): Repeal the following permits: Café Entertainment and Shows Exempt, Firefighter (Organization and Solicitor), Peace Officer Organization and Solicitor, Arcade Games, Cyber Café, Bowling Alley, Card Club, Dance Academy, Dance – Teenage Public, Figure Studio, Skating Rink, Escorts (both escorts and bureaus), Social Concierge, Games of Skill, Antique Shop, Antique Promoter, Closeout and Firesale, Rummage Sale, Secondhand books, Secondhand general, and Swap meet Operator.

Very truly yours,

A handwritten signature in black ink, appearing to read 'SM' or '25', written over a faint circular stamp.

SCOTT MOFFITT, Lieutenant
Commanding Officer
Commission Investigation Division

Commission Investigation Division Permits

CAFÉ ENTERTAINMENT AND SHOW PERMITS

	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
1	Arcade Picture	103.101	7/4/1958	0	0	0	0	0	\$231	\$231
2	Arcade Picture, Adult	103.101	5/1/2006	0.3	0	0	3	3	\$231	\$231
	Legal Summary:	Coin-operated motion picture projectors or DVD players that displays images or movies for five or fewer people at a time (adult or otherwise) requires a permit.								
	Public Safety Rationale:	The arcade picture law aligns with similar entertainment-related permits (such as movie theatres) to provide consumer protection, video pirating, and zoning and occupancy safety concerns. The adult picture also adds the elements of potential lewd conduct and zoning proximity concerns.								
	Fiscal Impact:	None to Limited.								
	Recommendation:	Maintain	Although the law is somewhat antiquated in a digital media age, it provides some enforcement and consumer protection options to prevent video pirating, as well as lewd conduct surrounding adult arcades.							
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
3	Café Entertainment and Shows	103.102	7/4/1958	33	17	17	337	354	\$789	\$327
	Legal Summary:	Any business that allows the public to view live entertainment requires a board permit.								
	Public Safety Rationale:	A permit ensures control over zoning compliance, alcohol service, crowd control, noise management, as well as security and liability considerations.								
	Fiscal Impact:	Moderate. Accounts for about \$125,000 in permit revenue, as well as other collateral commercial, wage, and tax benefits to the City.								
	Recommendation:	Maintain	Public safety surrounding alcohol consumption and noise control are commonly associated with this permit. Additionally, the gathering of potentially large amounts of people create additional safety concerns that are addressed with this permit.							

	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
4	Café Entertainment and Shows, Exempt	103.102		0	0	0	0	0	\$0	\$0
	Legal Summary:	A fee exemption exists for live theatrical performances with a seating capacity of fewer than 100 persons.								
	Public Safety Rationale:	A permit ensures control over zoning compliance, alcohol service, crowd control, noise management, as well as security and liability considerations.								
	Fiscal Impact:	None.								
	Recommendation:	REPEAL	Not necessary, zero permits issued in past 10 years. Very few potential businesses hold theatrical performances with capacity for fewer than 100 persons.							
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
5	Café Entertainment and Shows, Adult	103.102	9/25/2005	2.2	0	2	38	40	\$789	\$327
	Legal Summary:	Any business that allows the public to view adult / burlesque performances requires a board permit.								
	Public Safety Rationale:	Ensures control over zoning compliance, alcohol service, crowd control, noise management, and liability considerations. Additionally, lewd conduct, prostitution concerns, security requirements, and worker welfare concerns.								
	Fiscal Impact:	Limited. Accounts for about \$14,000 in permit revenue as well as other collateral commercial, wage, and tax benefits.								
	Recommendation:	MAINTAIN	Provides essential oversight of a "closely regulated" industry.							
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
6	Motion Picture Show	103.109	7/4/1958	2.6	0	0	20	20	\$231	\$231
7	Motion Picture Show (Adult)	103.109		0	0	0	1	1	\$231	\$231
	Legal Summary:	Presenting of motion pictures to the public in any theater, show house, or other place of entertainment requires a permit.								
	Public Safety Rationale:	Primary concerns of a motion show permit are video piracy and crowd control (crowded theatres). The permit verifies zoning concerns and other public safety concerns and allows oversight for potential video piracy concerns. Additional security considerations and adolescent protection are considered in instances of adult motion picture permitting.								
	Fiscal Impact:	Limited to Moderate. Accounts for about \$5,000 in permit revenue but collaterally, video piracy accounts for significant loss of GDP and job loss.								
	Recommendation:	MAINTAIN	Public safety concerns pertaining to crowded theatres and other relevant industry concerns exist to support maintaining this permit.							

Charitable Organization Permits									
Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
8	Firefighter Org - Promoter	103.212	7/4/1958	0	0	0	0	\$147	\$147
9	Firefighter Org - Solicitor	103.212	7/4/1958	0	0	0	0	\$89	\$89
Legal Summary: No organization shall conduct a solicitation nor authorize any person to conduct a solicitation for a purported firefighters' organization on its behalf without a valid permit from the Board									
Public Safety Rationale: There is a legitimate concern regarding fraudulent "fire" charities, however, there have been no organizations that have applied for or obtained such a permit in the past several years. Additionally, charitable contributions are regulated under section 42.00 LAMC and require the issuance of an information card.									
Fiscal Impact: None.									
Recommendation: REPEAL Such organizations are already required to obtain an information card from CID to solicit donations, the permit requirement is redundant.									
10	Peace Officer Org - Promoter	103.212	7/4/1958	0	0	0	0	\$0	\$0
11	Peace Officer Org - Promoter	103.212	7/4/1958	0	0	0	0	\$147	\$147
12	Peace Officer Org - Solicitor	103.212	7/4/1958	0	0	0	0	\$89	\$89
Legal Summary: No organization shall conduct a solicitation nor authorize any person to conduct a solicitation for a purported peace officers' organization on its behalf without a valid permit from the Board									
Public Safety Rationale: There is a legitimate concern regarding fraudulent "police" charities, however, there have been no organizations that have applied for or obtained such a permit in the past several years. Additionally, Charitable contributions are regulated under section 42.00 LAMC and require issuance of an information card.									
Fiscal Impact: None.									
Recommendation: REPEAL Such organizations are already required to obtain an information card from CID to solicit donations, the permit requirement is redundant.									

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	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
22	Dancing Academy	103.105	7/4/1958	1.3	0	1	14	15	\$110	\$110
23	Dance, Teenage-Public	103.118	7/4/1958	0	0	0	0	0	\$380	N/A
	Legal Summary:	A permit is required for an established place of business that provides dance instruction. For a teenage dance, a permit is required for a disco or similar business admitting youths (13-18) for the purpose of dancing.								
	Public Safety Rationale:	A permit ensures compliance with fire codes, zoning, as well as noise regulations. It also provides consumer protection and accountability. Teenage dances contains strict rules against drug, alcohol/use, and admission of unwelcomed adults.								
	Fiscal Impact:	Limited. Generates around \$1,500 in permit revenue.								
	Recommendation:	REPEAL The industry is primarily accountable to public demand. Businesses that fail to respond to customer demands will likely go out of business. Compliance issues can be resolved through other enforcement mechanisms within Building and Safety and other City Departments. Teenage dances (discos) have no apparent commercial demand; therefore, the permit is antiquated.								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
24	Figure Studio	103.213	2/15/1962	0	0	0	0	0	\$259	\$259
	Legal Summary:	Any premise in which models are paid to pose nude for artistic purposes.								
	Public Safety Rationale:	The primary public safety concern surrounding such businesses was lewd conduct and other related nuisance issues.								
	Fiscal Impact:	None.								
	Recommendation:	REPEAL Limited industry in which lewd conduct concerns can be addressed by other enforcement mechanisms.								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
25	Locksmith, Key	103.208	7/4/1958	28.6	4	0	314	314	\$107	\$107
	Legal Summary:	Any person conducting business as a key duplicator (locksmith) shall possess a Board permit.								
	Public Safety Rationale:	The permit process considers the criminal history background of locksmiths, as well as provides oversight, security standards, and accountability within the industry.								
	Fiscal Impact:	Limited to Moderate. Generates around \$33,000 in permit revenue as well as limited tax benefits.								
	Recommendation:	MAINTAIN The permit helps ensure quality control safety standards within the industry and should be retained.								

Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
26 Skating Rink	103.115	7/4/1958	0.2	0	0	2	2	\$138	\$138
Legal Summary:	Any place where skating is regularly conducted and the public is admitted (either with or without charge). The code does not define "skating" and could be interpreted to include ice skating, roller skating, or skateboarding.								
Public Safety Rationale:	The ordinance generally focused on roller skating in proximity to schools and curfew concerns. However, there are also some relative crowd control concerns and public safety concerns regarding vandalism, drug use, and fighting that can occur previously around roller skating but are now relevant to skateboarding.								
Fiscal Impact:	None.								
Recommendation:	REPEAL		Since most skate parks are city-controlled, public safety concerns are best addressed through other measures.						
INTIMATE SERVICES PERMITS									
Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
27 Bath / Tanning Salon	103.205.2	4/17/1976	7.4	2	1	65	66	\$147	\$147
Legal Summary:	Provides oversight of businesses or persons within the massage industry by requiring a permit.								
Public Safety Rationale:	The public safety concern surrounding baths is both prostitution and lewd acts.								
Fiscal Impact:	Limited. Results in around \$10,000 in permit revenue.								
Recommendation:	AMEND		Although Baths and bath houses should remain, tanning salons or similar references to "sun" or "light" baths should be removed from the code.						
Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
28 Massage	103.205	7/4/1958	86.1	61	85	443	528	\$688	\$327
29 Out-Call Massage	103.205	9/28/2016	8.6	0	0	30	30	\$116	\$116
Legal Summary:	Provides oversight of businesses or persons within the massage industry by requiring a permit.								
Public Safety Rationale:	Massage is generally viewed as a closely regulated industry due to its nexus to prostitution and human trafficking. Aligns with State laws to combat illegal activity within the industry.								
Fiscal Impact:	Moderate. Results in over \$220,000 in permit revenue.								
Recommendation:	MAINTAIN (Enhance)		Provides an essential public safety component that aligns with State efforts. Recommended that the City impose stricter enforcement laws and consequences for Massage businesses that are operating as brothels.						

	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
30	Social Concierge, Dance Hall	103.106.1	4/2/1974	0	0	0	2	2	\$320	\$320
31	Escort	103.107.1	2/6/1972	2.7	0	0	0	0	\$359	\$327
32	Escort Bureau	103.107	7/4/1958	0.2	0	0	0	0	\$390	\$327
	Legal Summary:	Any person (Escort) who accompanies another in either public or private in exchange for a fee, reward, or profit requires a permit or the business employing such persons (bureau). Social concierge clubs provide a partner in which patrons pay a fee or other consideration.								
	Public Safety Rationale:	Implemented to provide an additional tool for law enforcement to prevent prostitution and human trafficking.								
	Fiscal Impact:	None.								
	Recommendation:	REPEAL	Historical data suggests that this law is ineffective and may punish potential victims of human trafficking.							
LODGING PERMITS										
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
33	Hotel Operator	103.400	7/1/2024	N/A	N/A	0	0	0	UNK	UNK
34	Short-Term Rental Operator	103.400	7/1/2024	N/A	N/A	0	0	0	UNK	UNK
	Legal Summary:	It requires any operator of a hotel, motel, or short-term rental to obtain a board permit.								
	Public Safety Rationale:	The permit ensures compliance with zoning and use concerns, as well as enforcement of public order issues such as prostitution, drug use, traffic, nuisance and noise. It also helps ensure compliance with labor law violations.								
	Fiscal Impact:	Significant. It is estimated that upon the inception of the full permit, it will raise approximately \$1M in permitting revenue. It is unknown what collateral economic impacts may occur (such as revenue and occupancy tax and labor compliance, as well as tourism impact).								
	Recommendation:	REASSIGN	The recommendation to create a multi-disciplinary enforcement team of planning, housing, police, fire, and building and safety experts to implement the permitting requirements is the most viable solution to effective enforcement and administration.							

PUBLIC ASSEMBLAGE PERMITS										
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
35	Carnival (Daily)	103.104	7/4/1958	3.4	9	21	0	21	\$97	\$97
Legal Summary:		Any fair, festival or similar temporary event shall have a permit.								
Public Safety Rationale:		Large public gatherings have a myriad of safety concerns that require regulatory oversight; those concerns include crowd control for both boisterous behavior and ingress/egress concerns, oversight of alcohol consumption (when present), an evaluation of adequate span of control for security and emergency medical services, appropriate legal standing, as well as liability and accountability concerns, noise, nuisance, traffic, and parking management, as well as (temporary) structural and fire hazard considerations.								
Fiscal Impact:		Significant. Although only raising \$2,000 in permit revenue, carnivals have significant impact to local businesses, but also present significant liability concerns in the event of a public safety catastrophe.								
Recommendation:		MAINTAIN (Strengthen) Various charitable, religious, and educational institutions are exempt from permit requirements. This directly undermines the public safety component of a carnival permit. If appropriate a fee waiver could be legislated, but such institutions should not be exempt from permit requirements.								
36	Public	103.106	7/4/1958	17	43	27	0	27	\$603	N/A
Legal Summary:		The public gathering of persons where dancing is participated in requires a permit (generally in a space not designed for such use).								
Public Safety Rationale:		Large public gatherings have a myriad of safety concerns that require regulatory oversight; those concerns include crowd control for both boisterous behavior and ingress/egress concerns, oversight of alcohol consumption (when present), an evaluation of adequate span of control for security and emergency medical services, appropriate legal standing, as well as liability and accountability concerns, noise, nuisance, traffic, and parking management, as well as (temporary) structural and fire hazard considerations.								
Fiscal Impact:		Significant. Although raising over \$20,000 in permit revenue, such gatherings have significant impact to local businesses, but present significant liability concerns in the event of a public safety catastrophe.								
Recommendation:		AMEND (Clarify) CID through the Board of Police Commissioners will introduce recommended amendments to this code to strengthen essential public safety concerns and effective oversight of such events.								

	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
37	Game/Skills/Science	103.116	7/4/1958	1.3	2	2	9	11	\$138	\$138
Legal Summary:		Any game of amusement (except sporting competitions) that primarily employs judgment or skill, where consideration is								
Public Safety Rationale:		The primary public safety rationale is concerns regarding gambling. However, there are also consumer protection benefits as								
Fiscal Impact:		Limited. Rashes approximately \$1500 in permit revenue.								
Recommendation:		REPEAL Games determined to be constructive gambling devices can be regulated by State law.								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
38	Rides Mechanical (Non Renewable)	103.113	7/4/1958	26.8	58	27	0	27	\$112	\$112
Legal Summary:		No person shall operate a mechanical ride within 500 feet of a dwelling without a permit.								
Public Safety Rationale:		The permit helps ensure that the vendor operating the ride is properly licensed and insured and consequently helps ensure such rides are properly constructed and reasonable safeguards are in place in the operation of the ride.								
Fiscal Impact:		Limited. Results in over \$3,000 in permit revenue. Helps attract some commerce to the City.								
Recommendation:		MAINTAIN An evaluation of the company operating the ride is essential to ensuring established standards and safety within the industry.								
SECONDHAND SALE PERMITS										
	Permit Type	LAMC Section	Date into law	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
39	Antique Shop	103.301	7/4/1958	1	0	0	11	11	\$379	\$327
40	Antique Show Promoter	103.301.1	1/1/1976	0	0	0	0	0	\$379	\$327
Legal Summary:		Antique shop dealer or promoter must comply with secondhand dealer regulations and must abide by Board rules regarding such dealers.								
Public Safety Rationale:		Intended to regulate and prevent the sale of stolen property as well as provide consumer protection.								
Fiscal Impact:		Limited. Results in approximately \$3,500 in permit revenue.								
Recommendation:		REPEAL Limited concerns regarding stolen antiques coupled with other investigative and enforcement mechanisms make this permit unnecessary.								

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	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
50	Secondhand, Jewelry	103.311	7/4/1958	11.5	5	4	179	183	\$323	\$323
	Legal Summary:	No person shall engage in the business of secondhand jewelry dealer without a permit.								
	Public Safety Rationale:	Safety rationale is primarily consumer protection and the sale of stolen goods.								
	Fiscal Impact:	Moderate. Raises around \$60,000 in permit revenue.								
	Recommendation:	MAINTAIN Conforms with State law. The regular sale of stolen jewelry items makes this permit an essential component of business requiring such regulation.								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
51	Swap Meet Operator	103.311	8/17/1986	0	0	0	0	0	\$393	\$327
	Legal Summary:	No person shall engage in the business of a swap meet operator without a permit.								
	Public Safety Rationale:	Designed to regulate no sale of firearms or drug paraphernalia, as well as other regulations concerning swap meets, such as the gathering of crowds and necessary police presence at such events.								
	Fiscal Impact:	None.								
	Recommendation:	REPEAL No such permits have been issued in the past ten years despite the existence of such events. Police resources are better used focused on other permits.								
		SECURITY PERMITS								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
52	Private Patrol	52.34.B1	7/4/1958	4.4	0	0	24	24	\$0	\$0
53	Street Patrol Officer	52.34.B1	7/4/1958	117.8	81	75	244	319	\$0	\$0
	Legal Summary:	It is unlawful to engage in the business of private patrol (or officer) upon City streets without a permit.								
	Public Safety Rationale:	Establishes rules and accountability mechanisms for such businesses (and persons) so that they are not confused with actual law enforcement entities.								
	Fiscal Impact:	None.								
	Recommendation:	MAINTAIN The permit is an essential regulatory component to ensure that private patrols are not mistaken for law enforcement entities and helps ensure compliance with local and state laws.								

TRANSPORTATION SAFETY PERMITS										
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
54	Auto Park	103.202	7/4/1958	124.5	82	67	1067	1134	\$231	\$231
55	Auto Park Master	103.202		N/A	19	21	129	150	\$0	\$0
Legal Summary:		Any parcel of land under single management where more than eight vehicles are stored or parked, for a consideration, at any one time requires a permit.								
Public Safety Rationale:		A permit ensures zoning compliance, traffic management, consumer protection, and public safety (signage, lighting, etc.), as well as addresses insurance and liability concerns and potential noise issues. It also helps ensure parking occupancy tax compliance.								
Fiscal Impact:		Significant. Results in over \$250,000 in permitting fees and around \$120M in parking tax compliance.								
Recommendation:		MAINTAIN Fiscal impact, traffic management, and consumer protection concerns suggest the permit should be maintained.								
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
56	Tow Unit Operator	103.204.1	11/23/1969	74.3	41	29	412	441	\$271	\$271
57	Towing Operation	103.204	11/23/1969	4.2	0	2	78	80	\$329	\$327
Legal Summary:		No person shall conduct or operate a tow business without a permit.								
Public Safety Rationale:		The towing industry is rife with unscrupulous operators. Consequently, a permit provides a mechanism for regulatory compliance, fee regulation, consumer protection, public safety, accountability/trust, and liability coverage.								
Fiscal Impact:		Significant. Approximately \$150,000 in permit revenue but significant revenue from Board contract tow operations amounting to \$15M plus, as well as associated collateral business tax revenue for other properly permitted tow companies.								
Recommendation:		MAINTAIN (Enhance) The permit has essential public safety and consumer protection components. Stricter legislation is needed to combat unpermitted (bandit) tow operators.								

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	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
61	Valet Parking Operator - Variance	103.203	12/27/2019	0.8	0	0	0	0	\$0	\$0
	Legal Summary:	Requires a valet parking variance within designated (and limited) "Residential Sensitive Zones" upon assurances that the operation will not create a public safety or public nuisance. It has resulted in a reduction in residential valet operations.								
	Public Safety Rationale:	The ordinance provided the Board the authority to restrict valet parking in residential neighborhoods due to public nuisance complaints within residential neighborhoods generally stemming from house parties and traffic/parking concerns.								
	Fiscal Impact:	None.								
	Recommendation:	MAINTAIN	The need for a variance limits valet operations in small neighborhood streets where parking and traffic flow is limited.							
FIREARM PERMITS										
	Permit Type	LAMC Section	Date into law	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
62	Ammunition Vendor	103.314.1	2/2/2009	0.2	0	5	3	8	\$827	\$327
63	Firearms, Concealable,	103.314	2/2/2009	0.3	0	0	9	9	\$827	\$327
64	Firearms/Ammunition	103.314	2/2/2009	39.4	12	4	114	118	\$209	\$209
	Legal Summary:	No person shall conduct the sales of firearms or ammunition without a permit. Codified within Penal Code Section 26700 as a closely regulated business at both the state and local government level								
	Public Safety Rationale:	Legislation that prevents criminals from dealing (either purchasing or selling) firearms or ammunition and recordkeeping regulation. As well as enforce regulatory compliance of dynamic laws surrounding the purchase of both firearms and Limited. Expected to contribute around \$33,000 in revenue for 2025.								
	Fiscal Impact:	Limited. Expected to contribute around \$33,000 in revenue for 2025.								
	Recommendation:	MAINTAIN	Essential public safety oversight and aligns with State expectations for regulation.							
	Permit Type	LAMC Section	Date of Ordinance	Annual Avg (10y)	2024 Permits	2025 Permits*	2025 Renewals*	2025 Total*	Initial Permit Fee	Renewal Fee
65	Shooting Gallery	103.117	7/4/1958	0.1	1	2	3	5	\$220	\$220
	Legal Summary:	No person operate a place where guns are discharged without a permit.								
	Public Safety Rationale:	Ensures accountability, adherence to industry standards, as well as safety, zoning, and other laws.								
	Fiscal Impact:	Limited. Expected to contribute around \$1,000 in permit revenue.								
	Recommendation:	MAINTAIN	Essential oversight specific to adherence to best practices, zoning, liability, and other concerns.							

	Business	LAMC Section	Fund/Class	Original Fee	Annual Police Permit Fee	Recommendation
1	Arcade, Picture	103.101	P509	\$231.00	\$231.00	maintain
2	Arcade, Picture (Adult)	103.101	P709	\$231.00	\$231.00	maintain
3	Cafe Entertainment and Shows	103.102	P519	\$789.00	\$327.00	maintain
4	Cafe Entertainment and Shows, Exempt	103.102	P518	N/A	N/A	repeal
5	Cafe Entertainment and Shows, (Adult)	103.102	P719	\$789.00	\$327.00	maintain
6	Motion Picture Show	103.109	P581	\$231.00	\$231.00	maintain
7	Motion Picture Show, Adult	103.109	P781	\$231.00	\$231.00	maintain
8	Firefighter Organization	103.212	P678	N/A	N/A	repeal
9	Firefighter Organization - Promoter	103.212	P677	\$147.00	\$147.00	repeal
10	Firefighter Organization - Solicitor	103.212	P679	\$89.00	\$89.00	repeal
11	Peace Officer Organization	103.212	P680	N/A	N/A	repeal
12	Peace Officer Organization - Promoter	103.212	P682	\$147.00	\$147.00	repeal
13	Peace Officer Organization - Solicitor	103.212	P681	\$89.00	\$89.00	repeal
14	Arcade, Game	103.101.3	P510	\$139.00	\$139.00	repeal
15	Cyber Cafe	103.101.4	P511	\$138.00	\$138.00	repeal
16	Bowling Alley	103.112	P314	\$147.00	\$147.00	repeal
17	Family Billiard Room	103.112.1	P364	\$138.00	\$138.00	repeal
18	Pool Room-Single	103.112	P362	\$259.00	\$259.00	repeal
19	Pool Room	103.112	P363	\$231.00	\$231.00	AMEND
20	Card Club/School	103.103	P520	\$358.00	\$327.00	repeal
21	Dance Hall	103.106	P529	\$463.00	\$327.00	maintain
22	Dancing Club	103.106	P527	\$138.00	\$138.00	maintain
23	Dancing Academy	103.105	P526	\$110.00	\$110.00	repeal
24	Dance, Teenage-Public	103.118	P530	\$380.00	N/A	repeal
25	Figure Studio	103.213	P935	\$259.00	\$259.00	repeal
26	Locksmith / Key Duplicator	103.208	P950	\$107.00	\$107.00	maintain
27	Skating Rink	103.115	P582	\$138.00	\$138.00	repeal
28	Bath/ Tanning Salon	103.205.2	P912	\$147.00	\$147.00	AMEND
29	Massage Establishment	103.205	P951	\$688.00	\$327.00	ENHANCE
30	Out-Call Massage Business	103.205	P954	\$116.00	\$116.00	ENHANCE
31	Social Concierge, Dance Hall	103.106.1	P576	\$320.00	\$320.00	repeal
32	Escort	103.107.1	P933	\$359.00	\$327.00	repeal
33	Escort Bureau	103.107	P934	\$390.00	\$327.00	repeal
34	Hotel Operator	103.400	UNDETERMINED			TRANSFER
35	Short-Term Rental Operator	103.400	UNDETERMINED			TRANSFER
36	Carnival -- Daily	103.104	P523	\$97.00	\$97.00	ENHANCE
37	Dance, One Night-Public	103.106	P531	\$603.00	N/A	ENHANCE
38	Game/Skills/Science	103.116	P539	\$138.00	\$138.00	repeal
39	Rides Mechanical -- Per Event	103.113	P569	\$112.00	\$112.00	maintain
40	Antique Shop	103.301	P202	\$379.00	\$327.00	repeal
41	Collectors / Antique Show Promoter	103.301.1	P205	\$379.00	\$327.00	repeal
42	Close-Out and Removal sale -- Daily	103.308	P923	\$138.00	N/A	repeal
43	Fire sale -- Daily	103.308	P937	\$138.00	N/A	repeal
44	Junk Collector	103.304	P946	\$107.00	\$107.00	maintain
45	Junk Dealer	103.305	P947	\$323.00	\$323.00	CONSOLIDATE
46	Secondhand Auto Parts	103.309	P272	\$335.00	\$327.00	CONSOLIDATE
47	Pawnbroker	103.306	P462	\$834.00	\$327.00	maintain
48	Rummage Sale (Annual)	103.307	P970	\$107.00	\$107.00	repeal
49	Secondhand (Books/Mags.)	103.31	P274	\$323.00	\$323.00	repeal
50	Secondhand (General)	103.311	P273	\$323.00	\$323.00	repeal
51	Secondhand (Jewelry)	103.311	P275	\$323.00	\$323.00	maintain
52	Swap Meet Operator	103.311	P698	\$393.00	\$327.00	repeal
53	Private Patrol, Business	52.34.B1	P664	N/A	N/A	maintain
54	Private Patrol, Officer	52.34.B1	P664			maintain
55	Auto Park	103.202	P706	\$238.00	\$238.00	maintain
56	Auto Park Master	103.202	P705	N/A	N/A	maintain
57	Tow Unit Operator	103.204.1	P685	\$271.00	\$271.00	ENHANCE
58	Towing Operation	103.204	P287	\$329.00	\$327.00	ENHANCE
59	Valet Parking Attendant	103.203.1	P704	\$89.00	\$89.00	AMEND
60	Valet Parking Operator	103.203	P702	\$238.00	\$238.00	AMEND
61	Valet Parking Operator - Master	103.203	P701	none	none	maintain

61	Vallet Parking Operator Variance	103.203	P703	N/A	N/A	maintain
62	Ammunition Vendor	103.314.1	P927	\$827.00	\$327.00	maintain
63	Firearms Concealable Vendor	103.314	P925	\$827.00	\$327.00	maintain
64	Firearms/Ammunition Salesperson	103.314	P926	\$209.00	\$209.00	maintain
65	Shooting Gallery	103.117	P978	\$220.00	\$220.00	maintain