

Communication from Public

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Council File No: 26-0124

Comments for Public Posting: Please see attached public comment opposing Motion 26-0124

MOLLY LAW PC
Molly Pitluck

August 14, 2026

Re: Council File CF26-0124

My office and I strongly oppose Councilmember Padilla's motion filed on January 27, 2027 (CF26-0124). This motion attempts to impose extremely burdensome, if not impossible, requirements on obtaining or modifying a retail license, which would delay or outright prevent important, routine business modifications allowed under law and disproportionately negatively impact social equity applicants.

Years ago, the voters approved commercial cannabis and licensees work so hard to obtain and maintain licenses and operate compliant businesses in our communities. The current process to obtain a dispensary license already requires appearing in front of the neighborhood council if requested, community meetings, public notices and hearings. Existing law requires applicants to satisfy rigorous zoning, land use and public safety criteria long before reaching the Cannabis Regulation Commission's ("Commission") public hearing where they must meet strict statutory requirements for approval as set forth in LAMC 104.04. Aside from neighborhood councils and the Commission, licensees must also work with so many City and county agencies, such as the Department of Building and Safety, Public Health, Fire and the DCR, all governed by objective criteria.

Currently, the only storefront retailers in the City consist of Pre-ICOs and social equity applicants. For over six years now, only verified social equity applicants have been eligible for new retail storefront licenses. This motion attempts to impose even more bureaucracy and delays, oftentimes prohibiting City allowed modifications for relocations and entity substitutions (which were designed for social equity applicants to get away from predatory partners or landlords in the first place).

By the time they reach the Commission, applicants/licensees have already spent tens or hundreds of thousands of dollars (if not more) paying rent on a building they cannot use until licenses are issued, paying licensing fees, compliance fees, architectural and engineering fees, utilities and other business costs. Adding subjective requirements for letters of support from City Council, Neighborhood Council and the LAPD with even further community engagement is unrealistic and would have a devastating impact on the entire cannabis industry as it would prevent or significantly delay new dispensary applications, relocations and entity substitutions (or even ownership succession in the case of death) for already approved businesses. These applicants or licensees could be condemned to bankruptcy before even opening. This also creates instability for the entire supply chain, which cannot sell its compliant, tested products if retailers are blocked by local political processes.

Most alarming, this motion introduces inappropriate political subjectivity into the licensing of new businesses and modifications of already licensed businesses. The routine modification or new application for a licensed dispensary should not be dependent on the subjective whim of a

Council office (the very body making this motion), a member of the public generally opposed to cannabis, someone who wants to use that location for themselves even or the LAPD, which, in our experience, will not give any licensee a support letter. One (or even multiple) negative neighborhood council experience(s) with an applicant or licensee who was “rude” or “insulting” should not change or inject subjectivity into policy for all licensed operators or the industry as a whole.

The LAPD already lacks the resources to pursue illegal cannabis businesses, which is one of the biggest issues in the industry right now directly hurting our communities and licensed businesses. Unlicensed cannabis businesses, at a minimum, operate at all hours, do not pay taxes or licensing fees and put untested product into our communities. It would be particularly detrimental to the community to divert LAPD resources to have them adjudicate legal businesses with a support letter that have already been found compliant with objective criteria under established law.

LAMC 104.04 clearly lists the "Grounds for Denial" of a cannabis license which are strictly defined and based on **objective** criteria such as criminal history, failure to meet location requirements, engaging in unlicensed cannabis operations and misrepresentations. In addition, the Commission may deny a license if an applicant poses a threat to public safety, as documented by LAPD. This motion essentially seeks to introduce the absence of a letter of support or subjective complaints from a community group that is opposed to cannabis legalization or has a personal issue with an owner as a possible ground for denial of a modification or new license.

We share the desire for businesses to contribute positively to the social and economic fabric of our community. Licensees are legitimate businesses, and like us, are part of the very communities this motion claims to protect.