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August 26, 2026

Via Email Only: Clerk.PCN@lacity.org

Los Angeles City Council
c/o City Clerk's Office
200 N Spring Street, Room 360
Los Angeles, CA 90012

**RE: RADC Enterprises, Inc. / dba: Shell Gas Station and Rebel Convenience Store
10974 Ventura Boulevard, Studio City, CA 91604
Conditional Use Permit Case No. ZA-2024-5471-CU2-CUB-SPPC
Application for Determination of Public Convenience or Necessity Pursuant to Business
and Professions Code section 23958.4 for an Alcoholic Beverage Control ("ABC") License**

Dear Honorable City Council:

My office represents RADC Enterprises, Inc. ("Applicant") with respect to the above-mentioned matter. The Applicant submits this request for a Public Convenience or Necessity ("PC or N") determination for the off-site sale of beer and wine in conjunction with an existing, but soon to be completely remodeled and updated, Shell Gas Station and Rebel Convenience Store operating 24 hours, daily, in the C2-1VL-RIO Zone.¹

Prior to filing the Conditional Use Permit ("CUP") application, the Applicant conducted outreach within the community in an effort to address any potential concerns related to the off-site sale of alcoholic beverages. Specifically, we met with the Studio City Neighborhood Council, the Los Angeles Police Department ("LAPD"), and also reached out to Councilwoman Raman's Office.

The Zoning Administrator ("ZA") hearing took place on January 6, 2026, and subsequently, on February 10, 2026, the ZA issued a Letter of Determination approving the off-site sale of beer and wine. In addition to the approval for the off-site sale of beer and wine, the ZA also approved a "Specific

¹ Business and Professions Code section 23958.4 requires a PC or N determination if the applicant's premises are located in a crime reporting district that has a 20 percent greater number of reported crimes than the average number of reported crimes as determined from all crime reporting districts within the jurisdiction of the local law enforcement agency and/or if the ratio of off-sale retail licenses to population in the census tract in which the applicant's premises are located exceeds the ratio of off-sale retail licenses to population in the county in which the applicant's premises are located. Here, while the crime reporting district is not "high crime" there is an over-concentration of off-sale retail licenses, and thus, the PC or N determination is necessary.

Plan Project Compliance to allow the addition of 768 square feet of floor area to an existing 1,189 square-foot building, interior/exterior alterations, construction of a 200 square-foot trash enclosure, and installation of two (2) wall signs on a 12,631 square lot” (i.e., a remodel of the site). (Case No. ZA-2024-5471-CU2-CUB-SPPC).

The project site is located in Census Tract 1438.02. According to the California Department of Alcoholic Beverage Control (“ABC”), one (1) ABC license for the off-site sale of alcoholic beverages is permitted in this census tract. Currently, according to the ABC Licensing Report for Census Tract No. 1438.02, there is one (1) ABC license for the off-site sale of alcoholic beverages.² Thus, the addition of a Type 20 ABC license requires a Determination of Public Convenience or Necessity (“PC or N”). Although, a PC or N determination is needed, the census tract is not unduly over-concentrated with off-sale ABC licenses and there are adequate conditions within the Conditional Use Permit (“CUP”) to protect the public safety and welfare of the community.

While the census tract will be statutorily over-concentrated with the approval of an off-sale ABC license for this business, this does not necessarily result in an area becoming over-concentrated with alcohol licenses. Over concentration can be undue when the addition of a license will negatively impact a neighborhood. Over concentration is not undue when the approval of a license does not negatively impact the area, but rather such a license would benefit the public welfare and convenience. As such, here, the Zoning Administrator found that:

[i]n this case, the granting of the application will not result in undue concentration as the project will enable the provision of an additional service and destination to complement the neighborhood. The number of allocated off-site sale licenses will be exceed by this grant. Nevertheless, in active commercial areas where there is a demand for licenses beyond the allocated number, the ABC has recognized that high-activity retail and commercial centers are supported by significant employee population, in addition to the increasing resident population base in the area. The ABC has discretion to approve an application if there is evidence that normal operations will not be contrary to public welfare and will not interfere with the quiet enjoyment of property by residents. The project will continue to provide a valuable amenity and a desirable service that is compatible within the Studio City community.

(Case No. ZA-2024-5471-CU2-CUB-SPPC, page 22).

The addition of the incidental sale of beer and wine at a long-standing community-oriented local business will only serve to further provide for the needs of local businesses, neighbors, and the surrounding community. In fact, the Shell Gas Station and Rebel Convenience Store is seeking to offer this beneficial “one-stop” shopping experience in order to provide convenience to this area. The

² The existing one (1) off-sale ABC licensee within Census Tract 1438.02 is Studio City Liquor, Inc. (dba J&J Liquor) located at 11312 Ventura Blvd., Studio City, CA 91602 (ABC License No. 21-485125).

Applicant seeks to provide a full-service shopping experience for this community, in which nearby residents can purchase fuel, make purchases of grocery items, medicine, beverages, and/or other necessary retail items, along with the incidental sale of beer and wine. The continuation of the operations at this Shell Gas Station and Rebel Convenience Store, with strict adherence to the imposed conditions and under proper management and supervision, will continue to remain proper in relation to adjacent uses and the development of the community.

As stated, the sale of beer and wine will be an incidental use within the convenience store. With the approval of this PC or N application, the subject store will only provide a small amount of beer and wine for off-site consumption that is standard for this type of establishment. Furthermore, the Conditional Use Permit for the off-site sale of beer and wine in conjunction with this approved remodel of the premises has been approved. Specifically, as part of the CUP approval, the following relevant conditions have been imposed:

- Condition No. 4: All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence
- Condition No. 7: Authorized herein is the sale of beer and wine only for off-site consumption in conjunction with an 1,957 square-foot gas station convenience store.
- Condition No. 9: The establishment shall be maintained as a bona fide convenience store, offering food items for sale. Items for sale may include fresh and packaged meats, drinks, dairy products, produce, dry goods, frozen goods, sundries, paper goods, and other similar products.
- Condition No. 12: A camera surveillance system shall be installed and operating at all items to monitor the interior, entrance, exists, and exterior area, in front of and around the premises. Recordings shall be maintained for a minimum period of 30 days and are intended for use by the Los Angeles Police Department.
- Condition No. 13: All exterior portions of the site shall be adequately illuminated in the evening so as to make discernible the faces and clothing of persons utilizing the space. Lighting shall be directed onto the site without being disruptive to persons on adjacent properties.
- Condition No. 14: The exterior windows and glass doors of the store shall be maintained substantially free of signs and other materials from the ground to at least six feet in height above the ground so as to permit surveillance into the store by Police and/or private security.
- Condition No. 16: STAR/LEAD/RBS Training. Within the first six months of operation, all employees involved with the sale of alcohol shall enroll in the Los Angeles Police Department "Standardized Training for Alcohol Retailers" (STAR) or Department of Alcoholic Beverage Control "Licensee Education on Alcohol and Drugs" (LEAD) training program or the Responsible Beverage Service (RBS) Training Program. Upon completion of such training, the applicant shall request the Police Department or Department of Alcohol Beverage Control to issue a letter identifying which employees completed the training. STAR or LEAD or RBS training shall be conducted for all new hires within three months of their employment.

- Condition No. 17: The applicant shall be responsible for monitoring both patron and employee conduct on the premises and within the parking areas under the control of the applicant to assure such conduct does not adversely affect or detract from the quality of life for adjoining residents, property owners, and businesses.
- Condition No. 18: Loitering is prohibited on or around these premises and the area under the control of the applicant. “No Loitering or Public Drinking” signs shall be posted in and outside of the subject facility.
- Condition No. 19: At least one on-duty manager with authority over the activities within the facility shall be on the premises during business hours. The on-duty manager’s responsibilities shall include the monitoring of the premises to ensure compliance with all applicable State laws, Municipal Code requirements, the conditions imposed by the Department of Alcoholic Beverage Control (ABC), and the conditional use herein. Every effort shall be undertaken in managing the facility to discourage illegal and criminal activities on the subject premises and in any exterior area, including accessory parking areas, over which the building owner exercises control, in effort to ensure that no activities associated with such problems as narcotics sales, use or possession, gambling, prostitution, loitering, theft, vandalism, and truancy occur.
- Condition No. 22: The applicant shall be responsible for maintaining the premises over which they have control, including the adjoining sidewalk and any public or temporarily closed alleys abutting the site, free of debris and litter.
- Condition No. 23: An electronic age verification device shall be purchased and retained on the premises to determine the age of any individual and shall be installed on at each point-of-sales location. This device shall be maintained in operational condition and all employees shall be instructed in its use.

The Applicant respectfully requests that the Los Angeles City Council find that the Public Convenience or Necessity (“PC or N”) will be served by the issuance of a Type 20 beer and wine license at this location for the reasons contained herein.

I. GENERAL PROJECT DESCRIPTION

Pursuant to Los Angeles Municipal Code (“LAMC”) sections 12.24-W.1, 12.24-W.27, and 13B.4.2 the Applicant submitted a Conditional Use Permit (“CUP”) application for the off-site sale of beer and wine in conjunction with an existing Shell Gas Station and Rebel Convenience Store operating 24 hours, daily, at 10974 Ventura Boulevard., in the city of Studio City.

On February 10, 2026, Associate Zoning Administrator Jordann Turner granted the approval for off-site beer and wine sales under Case No. ZA-2024-5471-CU2-CUB-SPPC.³

³ Specifically, the Zoning Administrator approved the following:

“a Class 2 Conditional Use to allow the sale of beer and wine for off-site consumption in conjunction with an expanding convenience store in the C2-1VL-RIO Zone...a Class 2 Conditional Use to allow a deviation from Mini-Shopping Center/Commercial Corner Development provisions to allow 24-hour operations daily, in lieu of 7:00 a.m. to 11:00 p.m., otherwise permitted; and...a Specific Plan Project Compliance to allow the addition of 768 square feet of floor area to an

Now, the Applicant is respectfully submitting this application to the Los Angeles City Council for a Determination of Public Convenience or Necessity.

The premises is an existing Shell Gas Station and Rebel Convenience Store located on the south side of Ventura Boulevard and east side of Vineland Avenue in the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area. The subject property is a commercial use within an area designated for General Commercial land uses. The business currently exists as a full-service fueling station enabling customers to purchase everyday grocery items, including fresh food items, and is requesting approval for the off-site sale of alcoholic beverages to further the convenience provided to the surrounding community. The Rebel Convenience Store offers a wide variety of grocery/household items and beer and wine fall within the common type of goods that customers want from a full-service fueling station and food mart. This business has been in successful operation for many years and has proven itself in that time to be a good neighbor.

This Shell Gas Station and Rebel Convenience Store is consistent with other uses in the community, providing neighborhood convenience for automobile services and household products. The Applicant is now requesting a Determination of Public Convenience or Necessity in order to include the incidental sale of beer and wine in its product offering in order to serve all the needs of the patrons and the surrounding neighborhood.

The Applicant takes its role as responsible retailer of alcoholic beverages very seriously. To that end, initial and continued training of both management and staff is an important and fundamental element necessary to operate the Shell Gas Station and Rebel Convenience Store in a safe and trustworthy manner. Specifically, staff is trained on security, safety, deterrent strategies to discourage loitering, facility maintenance and operations, responsible sales of age-restricted products, accident prevention, and workplace safety. Management also trains its employees to monitor the interior and exterior of the premises. As part of this training policy, employees are expected to conduct regular site walks and inspections of the premises throughout the day in order to clean up any trash or debris as well as promptly deter any loitering, panhandling or other objectionable activity. Further, the premises is equipped with digital surveillance cameras that monitor both the interior and exterior of the building. These robust policies will ensure that the addition of a limited amount of alcoholic beverage sales for off-site consumption will not negatively impact the surrounding neighborhood.

In order to provide all of the items that its customers want, and to keep them coming back, it is necessary to provide a full complement of items, including beer and wine, rather than a limited selection. Located along a commercial corridor, the project will provide the area's residents, businesses, and employees an option for convenient access and one-stop shopping with a limited amount of alcoholic beverages incidental to other retail merchandise. Offering a modest and complementary range of beer and wine, along with other basic grocery items, provides for the convenience of the Applicant's customers, so that the customers can find all of their shopping needs in one local convenience store.

existing 1,189 square-foot building, interior/exterior alterations, construction of a 200 square-foot trash enclosure, and installation of two (2) wall signs on a 12,631 square-foot lot.”

Therefore, the project will perform a function that will be beneficial to the community and surrounding neighborhood.

II. THE PUBLIC CONVENIENCE OR NECESSITY WILL BE SERVED BY ISSUANCE OF A TYPE 20 ABC LICENSE BECAUSE THE SUBJECT BUSINESS SERVES THE COMMUNITY

The Applicant is requesting a determination of Public Convenience or Necessity in order to provide the incidental sale of beer and wine to further the convenience provided to the surrounding community. After operating for many years as a dedicated business within the community, there is no reason to expect that the continuation of this business with the addition of a small amount of beer and wine will adversely affect or degrade the adjacent properties or the surrounding neighborhood that it has operated in harmony with since it began operations. In fact, this gas station and convenience store has and will continue to have a positive impact on the welfare of the community.

The operation of this store, with the addition of beer and wine, will be a vital retail use serving the needs of local businesspeople, shoppers, and residents. The residential uses, as well as other establishments, have not been adversely affected in the years that this store has operated at this location and with the combination of proactive security measures and strict company policies, the Applicant is committed to protecting the safety and well-being of its community. The addition of an incidental amount of beer and wine for off-site consumption will not be detrimental to residential neighbors but rather will provide a desired amenity. This population seeks a diversity of services, one that the Applicant aims to provide. Beer and wine sales for off-site consumption will not detrimentally affect the neighboring residential, commercial, and institutional uses in the area because they will occur in a controlled environment within the food mart by trained employees and subject to multiple security measures, conditions imposed by the Zoning Administrator, and for consideration by the State Department of Alcoholic Beverage Control.

III. THE ACTION(S) SOUGHT

Based on the foregoing reasons, it is respectfully requested that the Los Angeles City Council make a finding that issuance of a Type 20 off-site beer and wine ABC license to RADC Enterprises, Inc. (dba: Shell Station and Rebel Convenience Store) will serve the Public Convenience or Necessity.

Should you have any questions or if there is any additional information we can provide, please do not hesitate to call or email our offices. Thank you.

Very truly yours,

SOLOMON SALTSMAN & JAMIESON



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Licensed in California