



SOUTHERN CALIFORNIA COALITION

July 11, 2017

Mr. Niall Huffman
Department of City Planning
Code Studies Division
200 N. Spring Street
Los Angeles, CA 90012

RE: Case No. CPC-2017-2260-CA
Commentary Relating to the Commercial Cannabis Location Restriction Ordinance and Supplement

Dear Mr. Huffman:

The Southern California Coalition and the organizations signatory to this document respectfully request that the City of Los Angeles (the City) make the changes proposed below to the draft of the City's Cannabis Land Use Ordinance and the Supplement issued with the Ordinance.

The Problem: Limited Immunity Arose as a Result of Proposition D. After it Became Part of the City's Ordinance, Circumstances Changed, Making it Unnecessary.

Before beginning our limited immunity analysis, our organization feels it is of the utmost importance to remind the City that the State of California (the State), per AB 94 now incorporated into the State's Medical and Adult-Use Cannabis Regulation and Safety Act (the MAU) requires, for a temporary state license, "a copy of a valid license, permit or other authorization issued by a local jurisdiction ..." (Business and Professions Code Section 26050. 1 (a) (2)).

Priority licensing, which veterans and Prop D compliant retail businesses in Los Angeles are eligible for, requires "that local jurisdictions identify for the licensing authorities potential applicants for licensure..." (See Business and Professions Code Section 26054.2 (b)).

In order to effectuate state licensing the City of Los Angeles cannot issue mere pieces of paper that state local businesses are currently in compliance with City laws. The State anticipates in its language, a more robust response that will give the State assurances that an applicant has been vetted at the local level and is operating his/her business in a safe and compliant manner, so that the State does not inadvertently license an entity which has health or safety issues.

This robust assurance only arises out of licensure. Anything less is too malleable a standard, and will only duplicate the confusion currently rife in Los Angeles, at the State level.

Several months after Proposition D (Prop D) was enacted into law, The United States Justice Department released the Cole Memo setting out guidelines for enforcement of the Controlled Substances Act within states which had cannabis programs. The Cole memo deprioritizes federal involvement where state and local governments have enacted and implemented "strong and effective regulatory systems" with "robust controls and procedures" both on paper and in practice.

More importantly, beginning in 2014, and every year since, the United States Congress has passed an important amendment to the annual Commerce, Justice, Science and Related Agencies Budget. Popularly known as the Rohrabacher-Farr Amendment¹ this piece of legislation bars the Department of Justice from expending any funds to enforce federal laws against state medical marijuana programs or those sheltering legally under them.

¹ The amendment has been part of the CJS Budget for so long that Representative Farr has now retired. The amendment is currently known as the "Rohrabacher-Blumenauer Amendment"



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This is appropriate, as 88% of the states now have laws recognizing the use of medical marijuana in some form or another.² A Quinnipiac University Poll showed an 89% approval rate for allowing the use of medical cannabis by adults who are ill.³

In 2016 California voters passed the Adult Use of Marijuana Act (AUMA) via a voter initiative. This is truly the will of the people and the City should not hide behind outdated analysis regarding the federal government's response to marijuana, nor should it use the Federal Government as an excuse to refuse licensure to cannabis businesses.

It should be noted that in the 21 years since the Compassionate Use Act became law in California, not one elected or appointed official has been indicted by the Federal Government for establishing a medical marijuana program or issuing licenses in connection with such a program.

Robust State Law Moots the Need for Limited Immunity

When Proposition D was enacted, there were almost no state laws regulating the medical cannabis industry and no laws at all relating to recreational cannabis businesses. Retail medical cannabis businesses had to be 600 feet from schools, but the rest of the rules followed locally arose from the 2008 Attorney General Guidelines, which are not state law and do not have the same force and effect as a state law. With no body of state law existent, it's understandable that the City would be hesitant to write their own.

The State of California has now enacted a comprehensive body of strict regulations relating to both the medical and the recreational use of marijuana. These laws were first designed by law enforcement and the League of Cities which fashioned the initial Medical Cannabis Regulation and Safety Act (the MCRSA). A more inclusionary process resulted in the Medical and Adult Use Cannabis Regulation and Safety Act (the MAU) passed as part of SB 94 in June of this year and meant to regulate both the medical and recreational cannabis industry.

The MAU incorporates procedures that support the Cole Memo. It provides powerful protections at the state level from diversion, particularly by children, and has over one hundred pages of complex rules which govern every aspect of the cannabis industry. The City can move forward secure in the knowledge that a meaningful body of state law now compliments local regulations.

Limited Immunity Has Caused Expensive Problems for the City and Crippled Stakeholders

Limited immunity has proved to be expensive and time consuming for the City as every business perceived to be in violation of limited immunity rules had to be brought into court. Licensure would allow for administrative remedies and an opportunity to cure, which is a more efficient and cost effective way to ensure compliance.

The limited immunity construct has created mass confusion. The City can't designate who is eligible for limited immunity without having the excluded entities sue, which is exactly what happened in 2013 when the City Attorney's Office posted a list of dispensaries which had satisfied the preliminary requirements for limited immunity.

The City was forced to remove the list from the City Attorney's web page to prevent even more litigation than the list initially generated. Had the City been vetting businesses and issuing licenses, the entities disputing the City's list would have already been exposed through the application process as being too defective to license and would have had no legal standing to sue.

In the absence of any guidance, such as a list of licensees, law enforcement had to "guess" who was in compliance and who wasn't. When they guessed wrong it created litigation headaches for the City who had to sort out

² See: The U.S. Dept. of Justice DEA 2015 National Drug Threat Assessment Summary, Pages 67-68

³ See: <https://www.inc.com/will-yakowicz/quinnipiac-poll-89-percent-voters-support-medical-marijuana.html>



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conflicting claims and risk losing before a judge. A robust regulatory process would have pre-determined who was eligible to operate a cannabis business within the City taking all the guesswork out of the equation.

Judges hearing city cases relating to Prop D haven't always been the best source of clarity. One superior court case resulted in the judge deciding whoever set up shop earliest was first in time, first in right, even if the earliest arrival was operating illegally.

Limited immunity created massive instability in the marketplace. Business operators found it difficult if not impossible to attract funding and partners as they had no licenses and no assurances from the City that they were in compliance with limited immunity rules.

Obviously, no funding mechanism or potential partner had any way of ascertaining who had found favor with the City and who was not compliant. As both investors and money lenders are bound by fiduciary obligations they could not, in good faith, invest or loan money.

In the vacuum created by the lack of licensure, unscrupulous entities applied for Business Tax Registration Certificates, (BTRCs) then claimed they were proof of licensure and sold them. Others used BTRCs to effectuate corporate identity theft. A third group used them as a basis to establish unauthorized businesses. It wasn't until 2016 that these abuses were curtailed and in the interim the City expended a great deal of money and effort to end these practices.

Had the City been engaging in meaningful licensure these problems could have been avoided as issuing a city license meant BTRC's would have had no currency as proof of a legal right to operate a cannabis business in Los Angeles.

Another unsolvable problem arising out of limited immunity was that the State of California's Governor vetoed legislation that would have allowed local entities to apply for state licenses without first acquiring a local license. When this happened, cannabis business operators in Los Angeles had no path to licensure as the limited immunity construct offered no licensing of any kind and a local license was required before a state license could issue. Though the State's stance has softened somewhat, meaningful authorization is still required and a license is the preferred method for demonstrating local approval.

Once the state began insisting on local licensure, limited immunity quickly became not only unworkable, but a fertile field for litigation and voter initiatives which are expensive and time consuming for the City. Both litigation and initiatives could result in the City losing control to autonomously regulate. The City has already weathered three attempts at voter initiatives in a five year span⁴.

The City's requirements for obtaining a Certificate of Compliance mirror the extensive requirements for a state license very closely. So closely, in fact, that a court may well decide that Certificates of Compliance are de-facto business licenses, carrying the same rights and remedies a license typically does.

Cities and counties all over the State are issuing licenses and if the City of Los Angeles refuses to do so, it may find that quality business operators and lucrative brands seek licensure elsewhere, causing the City to lose significant tax revenues and the opportunity for meaningful job creation.

Limited immunity was a legislative response to conditions which have changed. The City needs to adjust its regulatory framework accordingly.

Solution: Create a Robust Regulatory Scheme Which Includes Licensure

⁴ Proposition D was opposed on the ballot by Measure E and Measure F. Proposition M was opposed on the ballot by Measure N.



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Taken altogether, the above demonstrates that the limited immunity construct has caused expensive unsolvable problems in the past and promises even bigger headaches if the City insists on perpetuating it.

The City of Los Angeles needs to abandon the limited immunity construct and instead enact a robust regulatory scheme that allows the City to issue licenses, as was contemplated specifically by Proposition M. Doing so would create stability in the marketplace, clearly delineate who was operating legally in the City and provide the City with a wide variety of tools to regulate and control cannabis in the City of Los Angeles.

The Problem: The City Has Been Parsimonious in Allotting Zones For Cannabis Businesses. In Order To Ensure a Robust Tax Stream and Meaningful job creation, the City Must Adjust Its Zoning Allocations

The City's proposed land use ordinance needlessly restricts cannabis business to a few zones. Within several of those zones, all of the 6 types of businesses the City allows will be competing for a comparatively small amount of space. Despite the fact that cannabis businesses can control nuisance factors, present no danger to the public, and do not engage in retail sales, the City is still treating these businesses like they are processing plutonium rather than plant material.

Some Examples of Overly Restrictive Zoning:

- Cultivation is not allowed in Agricultural Zones.
- Cultivation is not allowed in C4 Zones, despite the fact the zone allows for hydroponic agricultural enterprises.
- Cultivation is not allowed in MR1 Zones despite the fact the zone allows for agricultural uses and warehouses.
- Manufacturing of edibles is not allowed in C2 zones, despite the fact that catering and bakeries are allowed.
- Manufacturing of Edibles is not allowed in CM zones, despite the fact that bakeries, candy manufacturing, catering, confection manufacturing, cookie manufacturing, doughnut manufacturing, ice cream manufacturing and pie factories are allowed.
- Manufacturing of edibles is not allowed in Hybrid Live/Work zones, despite the fact this zone allows M2 uses and manufacturers are allowed in M2 zones.
- Testing is not allowed in C2 zones despite the fact that medical, dental and quality control laboratories are permitted.
- Testing is not allowed in C4 zones despite the fact that medical and dental laboratories are permitted.

Note: zoning uses were drawn from: Case No. ZA94-0288 (ZAI) Official Use List, July 2000 edition. This document can be found at: http://cityplanning.lacity.org/zone_code/2000zc.062201.old/2000pdf/39ul.pdf

Solution: Expand zoning allocations for cannabis businesses. The determining factor should not be whether these businesses deal with cannabis, but rather, are they obeying the applicable regulations.

A zone which allows all kinds of laboratories should not exclude testing labs. A zone which allows the manufacturing of baked goods should not exclude edible makers. Land zoned for agricultural uses should not exclude cannabis cultivators. These businesses take great care to control any nuisance factors, are highly regulated at the state level and do not otherwise endanger their neighbors.

They should not be excluded from zones where similar businesses are allowed to locate simply because they cultivate marijuana or manufacture cannabis products. The determining question should **not be**: is this a cannabis based business, but rather: is this business obeying the rules. If so, the business should be treated like any other business similarly situated; not lumped in with strip clubs and liquor stores.



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The Problem: The City's Sensitive Uses Coupled With "As The Crow Flies" Measurement & the Removal of the Alley Abutment Rule So Restrict Available Land That It Will Materially Affect Tax Revenues, Job Creation and Could Destroy any Hope of a Cannabis Industry in Los Angeles.

As part of the discussions leading up to an earlier ordinance, The City Planning Department came to a City Council Meeting and projected maps which showed how much land would be available once sensitive uses were factored in. When the map showing six hundred feet came up on the screen, people gasped. The land available was so little that it seemed impossible for existing dispensaries to find compliant locations, and under the new rules proposed, many would have to move. The maps shown that day are now long outdated and two of the sensitive uses that were problematic, religious institutions and youth centers, were removed from the sensitive use list in the current ordinance.

Unfortunately, the removal of two sensitive uses from the City's proposed ordinance; has been offset by the recently enacted SB 94 which specifies that schools, day care centers and youth centers have a 600 foot sensitive use set-off. SB 94 does allow municipalities to select a radius that is less than 600 feet and to specify the manner of calculating the setback. (See section 26054(b) of the Business and Professions Code amended by SB 94 and now incorporated into the MAU.)

A study done in 2003, showed 10,167 day care providers in Los Angeles County.⁵ Figures on the City of Los Angeles were not available but it could be presumed a number of these entities are located in the City. The State's definition of a Youth Center is so broad it will greatly reduce the amount of land available. The applicable section states:

"Youth center" means any public or private facility that is primarily used to host recreational or social activities for minors, including, but not limited to, private youth membership organizations or clubs, social service teenage club facilities, video arcades, or similar amusement park facilities."⁶

Taken altogether, the City's sensitive use list, removal of the alley abutment rule, and "as the crow flies" measurement, when combined with the State's sensitive use list, means retail cannabis businesses will not have enough available land. The City cannot maintain its current rules without destroying thousands of jobs and forfeiting millions in tax revenue. These draconian rules may well destroy any hope of a cannabis industry in Los Angeles.

Prop D Compliant Shops and Pre-ICO Registrants Have Proven for Over a Decade That They Do Not Need to be Subject to Broad Sensitive Use Restrictions

It's important to remember that Prop D Compliant/Pre-ICOs have, for over a decade, continuously proven to be exemplary business partners with the City. They generate few police calls, pay taxes and are considerate neighbors. As a result of this good behavior, their right to exist has been enshrined in every ordinance the City has created.

Available land, even at 600 feet, is too scarce. Dispensaries are forced to move any time a landlord has to refinance his building or intends to sell. Additionally, landlords are demanding such high rents when leases are renewed that organizations have been forced to seek new locations. The City is now preparing to increase sensitive use footage to 800 feet which when combined with a "as the crow flies" system of measurement and removal of the alley abutment rule, will make it impossible for now compliant operators to move or new entities to exist.

⁵ See: <http://ceo.lacounty.gov/ccp/pdf/Family%20Child%20Care%20Workforce%20Survey%20Report-final.pdf>

⁶ See: B&P section 26001(au) of SB 94 now incorporated into the MAU which designates H&S section 11353.1 as the applicable definition of a youth center.



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Dispensaries which serve the public need to be in locations patients can access easily. Commercial zones are preferred because they are readily accessible via public transportation. Foot traffic is substantial enough in these zones that patients are not isolated and at risk of robbery, which might be the case in a poorly lit largely deserted manufacturing zone. In order for patients to be safe and well served by the City's medical marijuana program, the ordinance must allow enough land in commercial zones to service their needs.

The "as the crow flies" proposal for measurement is also in the MAU but as demonstrated in the next section below, the City is no longer bound by state law and may create its own standard of measurement.

Los Angeles is 437 square miles and contains a wealth of natural barriers as well a wide streets and freeways. If you use a standard of measurement that follows normal footpaths and allows for natural barriers as well as things like freeways, you increase the amount of land available.

It's also crucial that the City reinstate the alley abutment rule. Many of the City's commercial zones have a narrow alley directly behind the commercial strip with residences lining the alley on the other side. These residences are mostly older homes, and have steel walls and sliding steel gates or other barriers that muffle noise and bar entry on to the property from the alley.

To compensate for the proximity of these residences, the City enacted the "Alley Abutment Rule" as part of Proposition D.⁷ The rule allowed retail business to settle on commercial strips as long as the wall facing the alley was a blank one containing at most one emergency exit. That exit could not be used for patient egress or ingress, deliveries or any other use.

This accommodation worked well, and the residences bordering alleys had long ago insulated themselves so they were not affected. Restoration of the alley abutment rule would open up badly needed additional land for retail outlets. The City should be mindful of the fact that if it contemplates recreational sales, demand for the cleaner, higher quality cannabis that dispensaries have traditionally supplied will skyrocket. Additional retail outlets will need to be added so that patients still have an adequate supply of their medicine.

600 feet is the length of a standard city block. And, as demonstrated above, Prop D/Pre ICO dispensaries do not need to be a city block away from sensitive uses or each other. 300 feet is half a city block and is an adequate sensitive use distance.

Retail cannabis businesses should not have to be even 300 feet from each other. The City should consult with operators to see what the optimal distances should be. Entities that have co-existed for over ten years would have a much better idea than the City as to what would be appropriate. Because the City anticipates both recreational and medical sales, it may be that more outlets need to open to accommodate new clientele. Given the current land shortage, licensees will need to be closer to each other than 300 feet.

There are advantages to retail outlets being in close proximity. Patients don't need to re-park if they are looking for specialized products. Each outlet would have a private guard service and extensive camera systems focused on the surrounding streets, making that particular block a much safer place than if only one outlet were present. Because of proposed sensitive use rules, inappropriate concentrations of retail outlets would not occur, as they would spill into areas where schools, parks or daycare centers were located.

If the City insists on maintaining sensitive use distances of 800 feet, does not reinstate the ally abutment rule and uses "as the crow flies" criteria to measure distance, land will already be severely restricted. When you combine this with the state's addition of day care and youth centers, there may be no land left at all.

⁷ See: Proposition D Section 45.19.6.3 (L)



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Solution: The City needs to establish sensitive use set-offs of 600 feet for schools, 300 feet for everything else, restore the “alley abutment rule” and abandon the “as the crow flies” system of measurement.

While this may seem to impermissibly infringe on State law, it’s important to remember that the MAU gives cities enhanced regulatory powers such that the City is now allowed to set its own sensitive use radius. (See: section 26054(b) of the Business and Professions Code amended by SB 94 and now part of the MAU.)

Additionally, the MAU does away with the old admonishment in the Medical Cannabis Regulation and Safety Act (the MCRSA) which stated that cities could be stricter than state law, but could not otherwise deviate from state guidelines. Business and Professions Code Section 19316 (a)⁸ has now been replaced by the language below (emphasis added).

SEC. 102.

Section 26200 of the Business and Professions Code is amended to read:

26200.

(a) (1) This division shall not be interpreted to supersede or limit the authority of a local jurisdiction to adopt and enforce local ordinances to regulate businesses licensed under this division, including, but not limited to, local zoning and land use requirements, business license requirements, and requirements related to reducing exposure to secondhand smoke, or to completely prohibit the establishment or operation of one or more types of businesses licensed under this division within the local jurisdiction.

(2) This division shall not be interpreted to supersede or limit existing local authority for law enforcement activity, enforcement of local zoning requirements or local ordinances, or enforcement of local license, permit, or other authorization requirements...

(f) This division, or any regulations promulgated thereunder, shall not be deemed to limit the authority or remedies of a city, county, or city and county under any provision of law, including, but not limited to, Section 7 of Article XI of the California Constitution.

Given the above language, the City can move ahead with its own rules regarding sensitive use set-offs, the establishment of an alternate distance measurement for sensitive-use, and the reinstatement of the alley abutment rule.

The Problem: The City is not Offering Licenses for Outdoor Cultivation

Though the City has two agricultural zones that allow for the cultivation of plants the City has chosen not to allow outdoor cultivation within the City limits.

Outdoor and mixed light cultivation when done according to best practices is a safe and environmentally sound business. Properly maintained outdoor and mixed light grows can be made “theft proof” and would not otherwise inconvenience neighbors.

Denying licenses to outdoor and mixed light cultivation sites means that the City of Los Angeles would produce no “sun grown” cannabis, which many clients and patients prefer and need.

The omission of these types of licenses creates a climate of unfair competition, as many other areas have started to license outdoor and mixed light cultivation. Not allowing this kind of licensure means entities outside the City will control the market for outdoor and mixed light cannabis. The City will lose tax revenue and the opportunity for job creation.

⁸ The applicable section of the now defunct B&P Section 19316 stated: “... Any standards, requirements, and regulation regarding health and safety, testing, security and worker protections established by the state shall be the minimum standards for all licensees statewide.”



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Outdoor and mixed light licenses comprise 8 of the 20 licenses offered at the state level. When you eliminate outdoor and mixed light licensure, 40% of the licenses available at the state level are not available in the City of Los Angeles.

Solution: The City should revise its position and offer licenses for outdoor and mixed light cultivation. To ensure the health and safety of those on adjoining land, applications would include a security plan, demonstrating that the grow is reasonably theft proof, as well as detailed descriptions of how the entity plans to handle pesticide use, obtain water and dispose of waste.

Problem: The City is not Offering Licenses for Manufacturing with Volatile Substances

Volatile solvents are widely used for the manufacture of many commonly used products. Some examples are: perfume, natural flavorings, and decaffeinated coffee.

When done according to OSHA and FPA Guidelines using the correct procedures and equipment, manufacturing using volatile substances is a safe process. The City Currently allows, in M3 zones, activities that use the same methods involved in volatile manufacturing and which involve producing substances far more dangerous than cannabis oils.⁹

The State has issued careful guidelines and is allowing solvent manufacturing. If the State is confident that solvent manufacturing is safe, the City should be to.

The City's refusal to issue volatile manufacturing licenses precludes the use of butane, alcohol, CO2 and even water. This means patients will suffer, as the remaining processes are inefficient and expensive, increasing the costs to patients and possibly degrading the quality of the products available to them. The taste and smell of cannabis would remain in the product.

Volatile solvent manufacturing done according to best practices results in a pure product, allows for a high level of consistency and extremely accurate dosing, ensuring the health and safety of those using such products.

Solution:

Allow licensing for volatile manufacturing in M3 zones, subject to state and federal rules and best practices.

Problem: The City Does Not Provide Enough Privacy Protection for Applicants

A continuing problem with the proposed future applications is that the City is requiring an enormous amount of information but is providing no protections that safeguard the privacy of applicants, operators or employees.

The City often comments on the fact that cannabis and cash are risk factors but has not taken significant steps to protect applicants and employees, even to the extent that similarly situated businesses would be. We certainly don't expect bank managers to publicly post documents at their banks containing their personal information. But currently, retail cannabis operators must publicly post documents at their businesses which contain the home addresses of operators and employees (i.e. LiveScan results).

Potential licensees will be required to submit a great deal of personal information as well as trade secrets relating to the operations of their businesses in their City applications.

⁹ i.e. the manufacturing of acetylene gas, alcohol, linseed oil, paint, petroleum products, rubber, soap, varnish, acid, turpentine, gas, nitric acid, and sulfuric acid



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If this information was accessible by the general public or the press bad actors bent on mayhem would be able to easily rob or otherwise injure applicants. Others might gain unfair advantage by having access to the trade secrets of the applicant's business.

Additionally, the federal government should not be able to access information about applicants absent a court order or a warrant.

Finally, business operators should not be required to publicly post private, personal information.

We do not require other businesses to compromise their privacy to operate in Los Angeles, if doing so would require personal risk or the revelation of trade secrets. The cannabis industry should not be required to do so either.

Solution: The City should not allow the release of applicant information to the public or the press. No information containing personal information about business operators or their employees should be required to be publicly displayed. The City should follow the guidelines outlined in AB 1578¹⁰ and refuse to release information to the Federal Government absent a warrant or court order.

Problem: The City's Proposed Ordinance Supplement Requires the Department of City Planning to Review and Impose Site-Specific Conditions for Each Cannabis Business Seeking A Certificate of Compliance.

Applicants will be engaging in a complex and thorough application process. The applications will be reviewed by the Cannabis Commission.

There is no reason for a secondary land use review as the applications will not be approved by the Cannabis Commission if the applicant cannot produce adequate proof that their proposed site is compliant with city regulations.

Requiring a second review by the Department of City Planning is unnecessary as the contemplated cannabis ordinance does not allow for conditional use permits or other types of variances. Additionally, requiring a second vetting will create bottlenecks and other needless delays.

Solution: The City should **not** require a Department of City Planning review of the applicant's proposed land use.

The Southern California Coalition (the SCC) is the Southland's largest industry trade association, representing cannabis stakeholders across all licensing categories. It is unique in that it also includes major advocacy groups for minorities, patients and veterans as well as an organized labor component. The Southern California Coalition's mission is to ensure that cannabis legislation is fair, balanced, and inclusive.

The Southern California Coalition and the signatories to this letter respectfully submit the above suggestions for amendments to the City's proposed Cannabis Land Use Ordinance and Ordinance Supplement. Should you have any questions, our President, Virgil Grant can be reached at (310) 493-7651. Our Executive Director, Adam Spiker, can be reached at (714) 654-1930. Our email is: socalcoalition.info@gmail.com

¹⁰ AB 1578 is a proposed state bill which bars the federal government from obtaining information about individuals sheltering under state medical marijuana programs absent a court order.

See: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1578



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Sincerely,

A handwritten signature in blue ink, appearing to be "V Grant", enclosed in a rectangular box.

Mr. Virgil Grant
President - Southern California Coalition

A handwritten signature in blue ink, appearing to be "Erik Hultstrom", enclosed in a rectangular box.

Mr. Erik Hultstrom
President – Cultivators Alliance

A handwritten signature in blue ink, appearing to be "N. David Sparer", enclosed in a rectangular box.

Mr. N. David Sparer
President - Manufacturers Alliance

A handwritten signature in blue ink, appearing to be "Bobby Vecchio", enclosed in a rectangular box.

Mr. Bobby Vecchio
President – Los Angeles Delivery Alliance

A handwritten signature in blue ink, appearing to be "Adam Spiker", enclosed in a rectangular box.

Mr. Adam Spiker
Executive Director - Southern California Coalition

A handwritten signature in blue ink, appearing to be "Sarah Armstrong", enclosed in a rectangular box.

Ms. Sarah Armstrong
Director of Industry Affairs - Americans for Safe Access

A handwritten signature in blue ink, appearing to be "Cassia R. Furman", enclosed in a rectangular box.

Ms. Cassia R. Furman, Esq.
Vicente Sederberg, LLC



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A handwritten signature in blue ink, appearing to read "Chris Beals".

Mr. Chris Beals
President – Weedmaps

A handwritten signature in blue ink, appearing to read "Barry Broad".

Mr. Barry Broad
Legislative Director - CA Teamsters Public Affairs Council

A handwritten signature in blue ink, appearing to read "HD Allen".

Mr. Hezakaih Allen
Executive Director – California Growers Association

A handwritten signature in blue ink, appearing to read "Ken Spiker".

Mr. Ken Spiker
CEO – Spiker Consulting Group