

## Communication from Public

**Name:** Petra Williams

**Date Submitted:** 06/23/2020 07:15 AM

**Council File No:** 17-0653

**Comments for Public Posting:** I am a social equity applicant who submitted an application in phase 3 round 1. I am concerned about the new social equity qualifications that have been proposed. I was verified and secured a property under the understanding that I was a social equity applicant. Now to tell me that I am no longer qualify after all this time seems unfair. In my opinion the police beats do not give an accurate representation of a disproportionately impacted area. I shop and work and live in the impacted area. Zip codes give a more accurate representation of the neighborhood.

## Communication from Public

**Name:** Raza Lawrence and Allison Margolin, Margolin & Lawrence

**Date Submitted:** 06/23/2020 08:28 PM

**Council File No:** 17-0653

**Comments for Public Posting:** Dear Los Angeles City Council: We are submitting this comment as a supplement to the letter that we submitted on June 22, 2020, outlining our recommendations for how the City Council should amend its commercial cannabis ordinance. We wanted to raise two additional points that have become relevant since we sent our last letter. First, the Rules, Elections, and Intergovernmental Relations Committee has recommended that you allow only Social Equity Applicants who have a prior cannabis arrest or conviction, and only those who meet new eligibility criteria for the Social Equity Program using amended definitions of “Low Income” and “Disproportionately Impacted Area,” to apply for cannabis retail licenses in Phase 3, Round 2. Many Social Equity Applicants have relied upon the City’s current qualification standards for the program, and have expended great amounts of time and resources planning their businesses pursuant to the current standards. This group includes many applicants who applied for retail licenses in Phase 3, Round 1, and have been holding onto expensive properties since September 2019 in expectation that they would ultimately receive licenses from the City. Changing the standards for these people in the middle of the application process, after they have invested so much in reliance on the current rules, would be grossly unfair and potentially subject the City to liability from applicants who were initially told they were qualified, and then ruled ineligible under the altered rules. We have no objection to the City broadening the qualifying criteria to make additional people eligible to apply for licenses in future rounds, but there is no reason to also punish existing applicants by removing them from the program after they were already accepted. Second, one of the members of this City Council was arrested on June 23, 2020, for allegedly engaging in corrupt practices involving bribes for approval of development projects. In light of this arrest, we remain deeply concerned that the manner in which the Undue Concentration process is structured will invite corruption. We urge the City to adopt a liberal approval process that is fully open to the public, and does not reject any applications from qualified applicants who want to responsibly open a new business that will provide employment and tax revenues to the City, and help to shrink the massive illicit cannabis market that has proliferated in Los Angeles.