

December 7, 2021

C-20

HONORABLE MAYOR AND CITY COUNCIL
City of Long Beach
California

RECOMMENDATION:

Refer to a Hearing Officer the business license revocation appeal by SOCAL Equity Holdings, LLC, located at 214-216 Atlantic Avenue, Long Beach, for business license number BU21903666. (District 2)

DISCUSSION

Due to failure to comply with applicable laws and regulations pursuant to Long Beach Municipal Code (LBMC) Sections 5.90.030, 5.92.210, and 5.92.1420, SOCAL Equity Holdings, LLC, located at 214-216 Atlantic Avenue, Long Beach, was the subject of a business license revocation hearing on August 18, 2021. The hearing was conducted in compliance with LBMC Section 3.80.429.1.

On September 15, 2021, the Hearing Officer recommended the Director of Financial Management revoke business license number BU21903666 (Attachment A).

On October 6, 2021, the Department of Financial Management revoked (Attachment B) the commercial industrial space rental business license previously issued to SOCAL Equity Holdings.

Pursuant to LBMC Section 3.80.429.5, a licensee can appeal the revocation of a business license to the City Council. The licensee lodged its written request for appeal on October 14, 2021 (Attachment C). Whenever it is provided that a Hearing shall be heard by the City Council, the City Council may, in its discretion, conduct the Hearing itself or refer it to a Hearing Officer, in accordance with LBMC 2.93.050(A).

This matter was reviewed by Deputy City Attorney Arturo D. Sanchez on November 9, 2021.

TIMING CONSIDERATIONS

If referred, upon selection of a Hearing Officer, the matter will be heard not less than 30 days thereafter, pursuant to LBMC 3.80.429.5.

FISCAL IMPACT

There is no fiscal or local job impact associated with this item.

HONORABLE MAYOR AND CITY COUNCIL

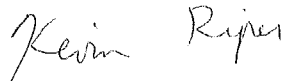
December 7, 2021

Page 2

SUGGESTED ACTION:

Approve recommendation.

Respectfully submitted,



KEVIN RIPER

DIRECTOR OF FINANCIAL MANAGEMENT

ATTACHMENTS: A – HEARING OFFICER REPORT
B – NOTICE OF BUSINESS LICENSE REVOCATION
C – SOCIAL EQUITY HOLDINGS APPEAL LETTER

APPROVED:



THOMAS B. MODICA
CITY MANAGER

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**ADMINISTRATIVE HEARING
CITY OF LONG BEACH**

ADMINISTRATIVE HEARING FOR
BUSINESS LICENSE NUMBER
BU21903666 ISSUED TO SOCIAL
EQUITY HOLDINGS, LLC, AT
214-216 ATLANTIC AVENUE TO
SHOW CAUSE WHY ITS LICENSE
SHOULD NOT BE REVOKED
PURSUANT TO LONG BEACH
MUNICIPAL CODE CHAPTER
3.80.429.1 FOR ALLOWING
UNLICENSED CANNABIS
ACTIVITIES TO OCCUR AT
214-216 ATLANTIC AVENUE IN
VIOLATION OF LONG BEACH
MUNICIPAL CODE CHAPTER
5.92.210

RECOMMENDATION AND FINDINGS

HEARING DATE : 8/18/21

ADMIN HEARING
OFFICER : LARRY MINSKY

I. INTRODUCTION AND POSITIONS OF THE PARTIES

This matter came on for hearing remotely via the WebEx platform on August 18, 2021 at 9:30 a.m. The Hearing was conducted by Administrative Hearing Officer Larry Minsky, assigned to this matter by the CITY OF LONG BEACH (City) to hear the timely appeal filed by Appellant EQUITY HOLDINGS, LLC

1 (Appellant) relative to the City's decision to revoke Appellant's City Commercial/
2 Industrial Space Rental Business License Number BU21903666 which enabled
3 Appellant to operate a non-cannabis-related business at 214-215 Atlantic Avenue,
4 Long Beach, California, 90802 (Property). The City's decision to revoke
5 Appellant's Commercial/Industrial License was predicated on its conclusion that
6 Appellant had been engaging in unauthorized, non-licensed cannabis activity at
7 that Property. (See: City Exhibits at pages 12-17.)
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10 The City notified Appellant of its intent to hold this hearing by letter dated
11 May 18, 2021 and thereafter, as a result of Appellant's request for a continuance of
12 said hearing, by letter dated July 26, 2021. (See: City Exhibits at pages 4 and 5.)
13

14 The City contends Appellant was engaging in unlawful cannabis-related
15 activity at the Property in violation of the City's Municipal Code. More
16 specifically, the City contends, inter alia, that on December 1, 2020, Appellant was
17 found to have been using the Property to store cannabis at the Property and/or use
18 the Property as part of Appellant's delivery operations and that its cannabis
19 operations were, through its personnel, creating a public nuisance
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22 Appellant contends: (a) it had a State-issued license to distribute cannabis;
23 (b) cannabis was not found by the City inspector's inside the Property at any point
24 during the City Inspector's visit to the Property; and, (c) as admitted in Appellant's
25 Closing Statements, it is their position that it is not illegal to have its cannabis
26 delivery agents/employees use the Property to rest, enjoy meal or rest breaks or
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1 take restroom breaks.

2 **II. SUMMARY OF RELEVANT EVIDENCE**

3 **A. DOCUMENTARY EVIDENCE**

4 **1. The City's Exhibits:**

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6 The City introduced a series of documents consisting of various letters, City
7 business licensing records, and various documents and photographs prepared or
8 secured by the City's Business Licensing Department and/or City Business
9 Inspector, Ms. Lori Voss (Voss). These documents were number from 001 through
10 072; all were admitted without objection. An additional document, an e-mail from
11 Voss dated December 2, 2020 constituting Voss's investigative activities and
12 observations of the Property, bearing City Exhibit page number 073 (12/2 email)
13 was also admitted during the hearing.
14
15

16 **2. Appellant's Exhibits:**

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18 Although Appellant was specifically advised of his right and given the
19 opportunity to present exhibits during the hearing, Appellant offered no exhibits.
20 However, attached to its post-hearing Closing Statement (Statement), Appellant
21 attached various documents. Though received after the close of testimony, said
22 documents were considered by this Hearing Officer.
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25 **B. TESTIMONY**

26 Following the presentation of its Opening Statement, the City offered only
27 the testimony of Voss and Appellant offered only its agent, Mr. Jorge Larios
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1 (Larios). No other witness testimony was presented. Larios was the Appellant's
2 sole representative at the Hearing; his name is listed as the author of Appellant's
3 Statement.
4

5 **I. Evidence Presented by Voss:**

6 Aided by her file and City documents, Voss testified to the following. City
7 records reflect Appellant has but a single City business license, that being, a
8 Commercial/Industrial Space Rental Business license bearing City License
9 Number BU2190366. That license permitted Appellant to conduct only
10 commercial or industrial activities on the Property. Appellant has no cannabis-
11 related City license. Voss testified Larios is associated with numerous cannabis
12 businesses entities/corporations. In his testimony and Statement, Larios admits
13 ownership in various cannabis-related businesses, at least one of which involved
14 the delivery of cannabis with a State license.
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18 Voss testified, as confirmed by her 12/2 email, that in late November 2020,
19 Voss began conducting surveillance of the Property as a result of a citizen
20 complaint. Voss learned from the complaining Citizen (Citizen) that persons were
21 entering and leaving through the rear of the Property at all hours of the day. The
22 Citizen's description of the problems suggested to Voss that there was, as she states
23 in her 12/2 email, "illegal marijuana business operating at the Property" (See: City
24 Exhibits at 073).
25
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28 During her surveillance, Voss testified she observed several white vans

1 parked in a parking lot located adjacent to the rear of the Property. (See infra:
2 white vans were observed and photographed on December 1, 2020 depicting
3 sizeable quantities of cannabis and cannabis-related items in the cargo space of
4 white vans.) In his Statement, Larios admits to having “product in said licensed
5 vans.”
6

7
8 Voss testified that the parking lot was owned by Appellant. In Appellant’s
9 Statement, Larios admits he was a member of a social bike club which does use the
10 adjacent parking lot for social events and had recently (some time prior to
11 December 1, 2020) been engaged in an activity resulting in complaints from
12 neighbors due to the loudness of the music coming from the event. White vans
13 were seen parked in this lot both during Voss’s November surveillance and during
14 her December 1, 2020 inspection of the Property.
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17 Following her surveillance on December 1, 2020, Voss, accompanied by
18 City Code Enforcement Inspector Ray Barajas and Fire Inspector John Fort,
19 (Team), conducted an inspection of the Property. Appellant’s property was
20 unavailable for inspection when the Team arrived. Voss testified to making efforts
21 to have Larios make the Property open for inspection; the Team never gained
22 access to the Property directly through Larios.
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25 There is no dispute that Voss and Larios talked on the phone on multiple
26 occasions on December 1, 2020. According to Voss, during one such conversation,
27 Larios admitted to operating a cannabis delivery business out of the Property, a
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1 contention Larios disputed through his direct examination. The Record reflects
2 Larios agreed to make the Property open and available to Voss for her to inspect
3 the Property in the afternoon. Based on said representation, the Team left the
4 Property to return later that day. Soon after the Team left, Voss was notified that
5 boxes were being taken out of the Property and moved into vans located in the
6 adjacent parking lot. As a result of that notification, the Team returned to the
7 Property at approximately 1:30 p.m. on December 1, 2020 and witnessed several
8 men carrying boxes out of the Property and placing them into white vans located in
9 the adjacent parking lot. Inspection of the boxes, depicted in the Team's
10 photographs (City Exhibits at pages 052-072) revealed the boxes contained
11 cannabis and cannabis paraphernalia. The white vans parked in the adjacent
12 parking lot were also inspected and the cargo spaces of the vans were found to
13 contain large amounts of cannabis and cannabis-related items.
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18 Voss and Team member Fort had previously met one of the men moving the
19 boxes out of the Property and knew him to be working for Larios. According to
20 Voss, that man advised her that (1) the men moving the boxes had been instructed
21 by Larios to quickly get all cannabis and related product out of the Property and
22 into the white vans, and (2) that Larios was operating a cannabis-related business
23 at the Property.
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26 **2. Evidence Presented by Larios:**

27 Larios admitted he owned or was one of the principal owners of several
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1 cannabis-related businesses, including a cannabis delivery company. He admitted
2 he and others used cannabis within the Property and that he owned various devices
3 used in the cannabis business. He admitted ownership of the strainers and scales
4 along with the remnants of cannabis flowers found in the Property which were
5 depicted in the Team's photographs. (See: City Exhibits at pages 051-057, 059-
6 72) While Larios admitted he and his employees/agents did partake in the use of
7 cannabis on the property, he denied Voss's claim that he had admitted to Voss that
8 he/Appellant was operating a cannabis delivery business out of the Property.
9 Larios stressed Voss's admission that she/the Team did not find any actual cannabis
10 inside the Property during Voss's inspection other than the few flakes depicted in
11 the photos (See: City Exhibits at page 060.) Larios admitted in his Statement that
12 his agents/workers from one of his/Appellant's businesses, Daze/GLD Delivery,
13 Inc., a State-licensed, statewide cannabis delivery company, did use the Property
14 for restroom, rest, and meal breaks. Daze products were found on December 1,
15 2020 in the white vans parked in the adjacent parking lot.

21 **III. STATEMENT OF ISSUE**

22 At times relevant herein, did Appellant utilize its non-cannabis,
23 Commercial/Industrial business license to engage in or operate cannabis-related
24 activities, including the delivery of cannabis products within the City of Long
25 Beach at the Property and did said conduct constitute a violation of Appellant's
26 commercial/industrial license and the City's Municipal Code entitling the City to
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1 revoke Appellant's business commercial/industrial license?

2 **IV. DISCUSSION**

3 Appellant appears to argue that its activities of using the Property for rest,
4 meal, and restroom breaks for its employees/agents constitutes a legitimate and
5 proper use of its City commercial/industrial license. Appellant asserts that their
6 drivers were merely stopping at the Property to engage in necessary breaks in
7 connection with their cannabis delivery business, a business authorized by its State
8 license, and therefore their actions did not violate the terms and conditions of its
9 City license. Appellant also points out that the City failed to establish the existence
10 of cannabis within its Property during Voss's December 1, 2020 inspection and
11 hence the City cannot legitimately conclude Appellant used the Property to engage
12 in cannabis-related activity. Based thereon, Appellant concludes the City's
13 decision to revoke its license was improper and must be reversed. Appellant's
14 conclusion/position is without merit.

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20 The clear weight of the evidence establishes that Appellant was in fact using
21 the Property to at least store cannabis for temporary or longer time periods and to
22 allow its delivery personnel to use said Property at all times of the day as a place
23 where its drivers could eat, relax, and use restroom facilities. The fact that
24 Appellant had/has a State license to operate a statewide cannabis delivery business
25 does not preempt the City's statutory restrictions for operating cannabis-related
26 activities within its jurisdiction, nor does it prohibit the City from requiring all
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1 businesses operating within the City and engaging in cannabis-related activity from
2 satisfying its cannabis-related licensing requirements as set forth in the City's
3 Municipal Code. Appellant was using the Property as part of the stream of
4 commerce of its cannabis-related businesses.
5

6 **V. RECOMMENDATION AND FINDINGS**

7 **A. FINDINGS OF FACT:**

- 8
- 9 1. Appellant was the licensed owner of the business located at 214-216
10 Atlantic Boulevard, Long Beach, California 90802.
 - 11 2. At times relevant herein, the City had issued Appellant a
12 commercial/industrial license for the Property bearing Long Beach
13 Business License Number BU21903666.
 - 14 3. Appellant and its owner(s) own and operate various cannabis businesses,
15 one of which is Daze/GLD Delivery, Inc., a cannabis delivery company.
 - 16 4. Appellant has no license through the City authorizing it to engage in
17 cannabis-related activities at the Property
 - 18 5. On December 1, 2020, City inspectors witnessed Appellant's
19 agents/employees transporting cannabis and cannabis-related products
20 and other material from the Property and placing them into Appellant's
21 white vans parked in a parking lot adjacent to the rear of the Property.
 - 22 6. Appellant's agents/employees, at the direction of Appellant/Larios, did
23 store cannabis within the Property and upon learning of the pending
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1 Team's inspection, did seek to hide the storing of said cannabis product
2 located in the Property from the City's inspectors.

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4 7. Appellant's agents/employees admitted to City inspectors that
5 Larios/Appellant was operating a cannabis-related business at/within the
6 Property.
7
8 8. Appellant did use its Property for cannabis-related business activity.
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10 9. Appellant was fully apprised of the City's intent to revoke Appellant's
11 license noted above and was properly afforded due process relative to the
12 matters addressed herein.
13
14 10. To the extent any conclusion of law identified below constitutes a
15 finding of fact, it is hereby incorporated

16 **B. CONCLUSIONS OF LAW:**

- 17 1. Appellant filed a timely appeal of the City's decision to revoke
18 Appellant's Business License Number BU21903666.
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20 2. Appellant was authorized by said commercial/industrial license to
21 operate non-cannabis commercial or industrial activities on the Property
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23 3. At times relevant herein, Appellant operated/used its Property for
24 cannabis-related activities in violation of LBMC section 5.92.210 (A)(2).
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26 4. At times relevant hereto, Appellant possessed a State-issued license to
27 operate a cannabis delivery business.
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29 5. At times relevant hereto, Appellant did not possess any cannabis-related

1 business licenses within the City of Long Beach.

2 6. At times relevant hereto, Appellant was using its commercial/industrial
3 license to operate cannabis-related business activities within the City in
4 violation of the LBMC.

5
6 7. The issuance of a cannabis-related license permitting Appellant to
7 operate a cannabis delivery business in the State of California did not
8 prevent the City from enforcing the provisions and restrictions imposed
9 on Appellant by its Municipal Code and by California Business &
10 Professions Code section 26200
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12
13 8. To the extent any conclusion of fact identified above constitutes a
14 conclusion of law, said conclusion is hereby incorporated.
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16 **VI. CONCLUSION**

17 The Record here establishes by a preponderance of the evidence that
18 Appellant used its City Business License Number BU21903666 for operating
19 cannabis-related activities out of its Property. The City's decision to revoke
20 Appellant's commercial/industrial Business License Number BU21903666 is
21 upheld.
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26 Dated, September 15th, 2021



LARRY MINSKY,

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ADMINISTRATIVE HEARING OFFICER

LARRY MINSKY, ESQ., SBN 096592
Administrative Hearing Officer
Telephone: (562) 435-7878
Facsimile: (562) 432-3822
Email: larry@minskyesq.com

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October 6, 2021

SOCAL Equity Holdings, LLC
214 Atlantic Avenue
Long Beach, CA 90802

RE: Notice of Business License Revocation for Business License Application BU21903666

Dear Sir or Madam:

Please be advised that business license BU21903666, issued to SOCAL Equity Holdings, Inc., located at 214-216 Atlantic Avenue, Long Beach, CA 90802 **has been revoked**, pursuant to Long Beach Municipal Code ("LBMC") Section 3.80.429.1(a), **effective October 6, 2021**. Pursuant to LBMC Section 3.80.429.5, you have 10 calendar days from the date of this letter to file an appeal of the revocation, otherwise the revocation will be final. Your appeal must be submitted no later than October 16, 2021.

To file the appeal, a request must be made in writing and must set forth the specific ground(s) on which the appeal is based and must be accompanied by a non-refundable cashier's check or money order, made payable to the City of Long Beach, in the amount of \$1,471. The request for appeal must be mailed to the City of Long Beach Financial Management Department, Business License Division, Attn: Susan Gonzalez, 411 W. Ocean Boulevard 6th Floor, Long Beach, California, 90802.

Failure to cease operations at this location after October 16, 2021 shall constitute a criminal offense pursuant to LBMC Sections 3.80.429.1(b) and 3.80.210. Pertinent sections of the LBMC are attached.

Should you have any questions, please contact Susan Gonzalez, Administrative Analyst, at (562) 570-6162 or by email at susan.gonzalez@longbeach.gov.

Sincerely,



Tara Mortensen
Recovery and Business Services Bureau Manager

CC: Art Sanchez, Deputy City Attorney
Council District



3.80.210 - License and tax payment required.

There are hereby imposed upon the businesses, trades, professions, callings and occupations specified in this Chapter license taxes in the amounts hereinafter prescribed. It shall be unlawful for any person to transact and carry on any business, trade, profession, calling or occupation in the City without first having procured a license from said City to do so and paying the tax hereinafter prescribed and without complying with any and all applicable provisions of this Code, and every person conducting any such business in the City shall be required to obtain a business license hereunder.

This Section shall not be construed to require any person to obtain a license prior to doing business within the City if such requirement conflicts with applicable statutes of the United States or of the State of California.

Any person who engages in any business for which a business license is required, shall be liable for the amount of all taxes and penalties applicable from the date of commencement of the business, whether or not such person would have qualified for such business license; however, such payment shall not create any right for the person to remain in business.

All payments of business license tax received by the City, irrespective of any designation to the contrary by the taxpayer, shall be credited and applied first to any penalties and tax due for prior years in which the tax was due but unpaid.

(Ord. C-7783 § 2, 2002; Ord. C-6259 § 1 (part), 1986)

3.80.429.1 - Suspension or revocation.

A. Whenever any person fails to comply with any provision of this Chapter pertaining to business license taxes or any rule or regulation adopted pursuant thereto or with any other provision or requirement of law, including, but not limited to, this Municipal Code and any grounds that would warrant the denial of initial issuance of a license hereunder, the Director of Financial Management, upon hearing, after giving such person ten (10) days' notice in writing specifying the time and place of hearing and requiring him or her to show cause why his or her license should not be revoked, may revoke or suspend any one (1) or more licenses held by such person. The notice shall be served in the same manner as notices of assessment are served under Section 3.80.444. The Director shall not issue a new license after the revocation of a license unless he or she is satisfied that the registrant will thereafter comply with the business license tax provisions of this Chapter and the rules and regulations adopted thereunder, and until the Director collects a fee, the amount of which shall be determined by Director in an amount to recover the actual costs of processing, in addition to any other taxes that may be required under the provisions of this Chapter.

B. Any person who engages in any business after the business license issued therefor has been suspended or revoked, and before such suspended license has been reinstated or a new license issued, shall be guilty of a misdemeanor.

(Ord. C-6259 § 1 (part), 1986)

3.80.429.5 - Appeal of license revocation.

Any licensee whose license is revoked under this Chapter shall have the right, within ten (10) days after the date of mailing of the written notice of revocation, to file a written appeal to the City Council. Such appeal



shall set forth the specific ground or grounds on which it is based. The City Council shall hold a hearing on the appeal within thirty (30) days after its receipt by the City, or at a time thereafter agreed upon, and shall cause the appellant to be given at least ten (10) days' written notice of such hearing. At the hearing, the appellant or its authorized representative shall have the right to present evidence and a written or oral argument, or both, in support of its appeal. The determination of the City Council on the appeal shall be final.

(Ord. C-6259 § 1 (part), 1986)



10/14/21

**Appeal: BU21903666 Business License Revocation
216 Atlantic Ave, Long Beach CA 90802**

To the City of Long Beach,

I strongly believe that the revocation of my license at 216 Atlantic Ave, Long Beach is strictly based on unwarranted assumptions. There was no actual evidence or proof of any illegal or legal cannabis business conducted at the respective location and hearsay is not enough to revoke the business license. There was no definitive evidence presented at the city hearing and detective Lori Voss stated on the record that she did not find any Cannabis products inside the building, 216 Atlantic. By law an adult use patient is able to possess up to 28 grams of cannabis if they are 21 and older and no limits that exceeded this were found at the location. It is unwarranted to revoke the business license at 216 Atlantic Ave, when there was no Cannabis products found.

The city first claims that the business license was revoked for "engaging in unauthorized, non-licensed cannabis activity at the property". That is a false claim as there was no actual cannabis activity occurring at the facility. There was clearly no violation there, and the city is assuming the cannabis activity without any clear evidence.

Detective Voss also claims that activity was being conducted at the property due to the fact that employees of another entity would safely be able to use the restroom or have a lunch break at 216 Atlantic Ave. This is also a misunderstanding by Voss, as it is no different than employees stopping at the gas station, grocery stores, convenience stores to use the restroom in the city of Long Beach, except they fall into a more dangerous situation during those experiences as they leave the vehicle unsupervised, possibly leading to a car robbery in sketchy locations. BCC Regulations Section 5311 (H) states that a transporter should not leave the vehicle unattended. BCC Regulations 5311 (K) also states that transporters may not stop between delivery unless it is for necessary fuel or rest, a lunch break is a form of necessary rest for our employees.

Another claim that has not been backed by any evidence is the statement that vans were being filled with inventory after the inspection attempt occurred. This is a statement that has no merit as there are no individuals who can testify and the claim is simply hearsay. Relative to the van situation, Voss claims that an employee of Larios, said to her that Larios instructed him to move all product into the van and that Larios was running a delivery business from the property. That is not a true statement and the employee is willing to testify that he did not state either of those statements to Lori Voss. There is no prior statement that would justify the validity of that statement. Voss also has claimed that Larios has admitted that he operated the delivery service out of the property which is not true. There are numerous claims by Voss about the business connected to the property that are without merit.

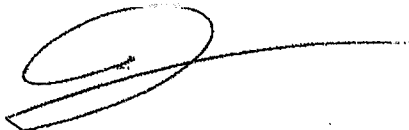
A statement in the hearing officer's revocations and findings also claims that a justification for the revocation of the business license is that Mr. Larios did not possess any cannabis related business license in the city of Long Beach, which is completely irrelevant to the situation. Firstly, it was never proven that there was any type of cannabis activity at said location as therefore the possession of a license in the City of Long Beach is irrelevant to the situation.

Secondly, a statewide delivery license supersedes the jurisdiction of the city of long beach according to : Regulation 5416(d) which states that local control is not absolute and while the city can regulate and even ban cannabis delivery businesses established within their local borders, the city cannot ban licensed businesses that are established in other cities or counties from delivering into the city's jurisdictions. It is also unlawful for cities to ban the applicable citizens within their borders from ordering and receiving their delivery orders from state licensed delivery operators as long as they meet the qualifications to order such as age requirements. Such an example can be demonstrated when the cities of Beverly Hills, Santa Cruz, Riverside sued the state for allowing statewide delivery within their borders, ultimately losing the court case against the BCC because cities cannot override the regulations set forth by the State. If the city does not outline these rules then the state laws apply and supersede the city guidelines.

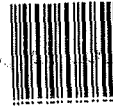
A crucial assumption that the City of Long Beach does not understand is the relationship between my ownership of a licensed Cannabis license and my ownership of a business license at 216 Atlantic Ave. Just because I am an owner of both does not mean that the two separate entities are operating together. I, owner of 216 Atlantic Ave allowed employees to safely use the restroom and enjoy their deserved lunch breaks, does not constitute that I, owner of Cannabis license allowed my employees to use the location for business activity by allowing them access to the restroom or to have a safe lunch while their transport fleet are not in danger. The two operations are not related in any manner, and it does not justify the city's assumptions that we conducted either legal or illegal activity at said location. Neither ever occurred nor can be proven by evidence to have occurred.

The City of Long Beach's core values are listed as Ethics, Intelligence and Respect and neither of the three have been displayed in their duties to justice and equality, a picture is being painted that is inconclusive to my own ethics and there is an obvious mistake in the revocation of my license without any clear evidence. The revocation of my business license is unwarranted and without evidence, and I will continue to seek justice for the situation that has without evidence or cause affected my livelihood.

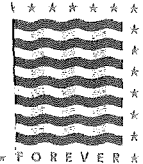
Jorge Larios
Property Owner
216 Atlantic Ave Long Beach

A handwritten signature in black ink, appearing to be 'Jorge Larios', written over a horizontal line.

Social Equity Holdings LLC
 216 Atlantic Ave.
 Long Beach CA 90802



U.S. POSTAGE PAID
 FOIL LETTER
 LONG BEACH, CA
 90802
 OCT 15 21
 AMOUNT
\$3.75
 R2306K133094-15



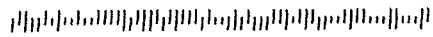
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



7020 3160 0000 2828 0953

ATTN: Susan Gonzalez
 City of Long Beach Financial Management
 Department Business License Division
 City of Long Beach 6th Floor
 411 W. Ocean Blvd. Long Beach
 CA 90802

90802-466499



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <i>X J LARIOS</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> <i>J LARIOS</i></p> <p>C. Date of Delivery <input type="checkbox"/> <i>8/10</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: <i>2014-19-EMR</i></p>	
<p>1. Article Addressed to: SOCIAL EQUITY HOLDINGS, LLC ATTN: JORGE LARIOS 216 ATLANTIC AVE LONG BEACH, CA 90802</p>		<p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery (over \$500) <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>2. Article Number (Transfer from service label) 7018 2290 0001 9225 7254</p>		<p>9590 9402 5455 9189 8615 62</p>	

Social Equity Holdings LLC
 216 Atlantic Ave.
 Long Beach CA 90802



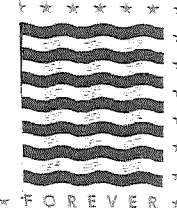
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U.S. POSTAGE PAID
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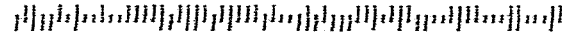
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS; FOLD AT DOTTED LINE
CERTIFIED MAIL



7020 3160 0000 2828 0953

ATTN: Susan Gonzalez
 City of Long Beach Financial Management
 Department Business License Division
 City of Long Beach 6th Floor
 411 W. Ocean Blvd. Long Beach
 CA 90802

90802-466499



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS; FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
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