

# APPEAL APPLICATION

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GENERAL INFORMATION: (Please print)

Date: August 16, 2019

Appellant: SweetFlower Pasadena, LLC

Mailing Address: 10000 Culver Blvd.

City: Culver City State: CA Zip: 90232

Phone #: (day) (310) 995-2299 (evening) Fax #:

Contact Person: Artin Shaverdian and Greg Sanders of Nossaman LLP Phone #: (213) 612-7811; (949) 477-7669

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Applicant (if different from appellant):

## APPEAL APPLICATION

Application # PLN2019-00386 Date of Decision August 7, 2019 Appeal Deadline August 19, 2019

Property Address: 827 E. Colorado Blvd., Pasadena, CA

I hereby appeal the decision of the: Board of Zoning Appeals

The decision maker failed to comply with the provisions of the zoning ordinance in the following manner:

The decision of the Board of Zoning Appeals denying the appeal of SweetFlower Pasadena, LLC ("SweetFlower") was erroneous and not legally grounded for, among others, the following reasons:

A. The SweetFlower cannabis retailer conditional use permit application was compliant in all respects with the requirements of the Pasadena Municipal Code and regulations lawfully promulgated thereunder.

B. The Department of Planning and Community Development Director ("Director of Planning") has no authority to promulgate cannabis retailer conditional use permit regulations. Such authority is vested solely in the City Manager. Nevertheless, the Director of Planning has promulgated such regulations which have been applied in a manner detrimental to SweetFlower.

C. The Department of Planning and Community Development violated the due process rights of SweetFlower by changing the standards for determinations of completeness of cannabis retailer conditional use permit applications a number of times following the opening of the application process and has not published clear, definitive requirements for such determinations.

D. The Department of Planning and Community Development violated the due process rights of SweetFlower by failing to consistently and fairly apply the requirements of the Pasadena Municipal Code (and ultra vires regulations) for determinations of completeness of cannabis retailer conditional use permit applications.

August 16, 2019

Applicant's Signature

Date of Application

Artin N. Shaverdian, Attorney for Appellant  
Nossaman LLP, 777 S. Figueroa St., 34th Floor, Los Angeles, CA 90017

Activity # \_\_\_\_\_

Application Fee: \$ \_\_\_\_\_

Date Received: \_\_\_\_\_

Appeal Hearing Date \_\_\_\_\_

Received by: \_\_\_\_\_