



Maricela E. Marroquin

T 213.626.8484  
F 213.626.0078  
E mmarroquin@rwglaw.com

355 South Grand Avenue  
40th Floor  
Los Angeles, CA 90071-3101  
rwglaw.com

August 19, 2019

Larry Thacker  
[compliance@gocaliva.com](mailto:compliance@gocaliva.com)

Re: Pasadena Public Records Act Request # 11252

Dear Mr. Thacker:

The City of Pasadena ("City") has retained our firm to respond to Public Records Act requests. On June 6, 2019, you submitted a public records act request seeking "a copy of each of the 122 complete applications submitted to the City in response to the city's request for commercial cannabis retail permit applications. Please include any documents that indicate the points that were awarded to each application for each of the 28 application review criteria."

The City has disclosable documents responsive to your request. The redacted versions of 62 of the applications that you requested can be found here:

<https://ww5.cityofpasadena.net/planning/redacted-cannabis-applications/>. The scoring information can be found in the first few pages of each of the applications. The City will continue to redact and place additional cannabis retailer permit applications on the website (link above) as they become available. You can expect that approximately fifteen additional redacted cannabis permit applications will be on the website every two weeks beginning August 30, 2019. Additionally, once all the redacted applications have been placed on the website, the City expects to review the applications that were posted as of August 29, 2019 to determine whether additional information, that was previously redacted, should be disclosed from these applications.

The Public Records Act permits a local agency to withhold from disclosure records that are exempt from disclosure, or portions of such records that are covered by an exemption. (Cal. Gov. Code, § 6250 et seq.) The City is withholding records from disclosure, in part, pursuant to one or a combination of the exemptions listed below:

- A. Statements of personal worth or personal financial data required by a licensing agency and filed by an applicant with the licensing agency to establish his or her personal qualification for the license, certificate, or permit applied for. (Cal. Gov. Code § 6254(n)).

- B. Corporate financial data. (Cal. Gov. Code § 6254.15).
- C. Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy, are exempt from disclosure pursuant to California Government Code Section 6254(c), as well as other similar information protected by the privacy provisions of Article I, Section 1 of the California Constitution. (Cal. Gov. Code § 6254(k)).
- D. Copyrighted material, the disclosure of which is exempted or prohibited pursuant to federal or state law. (Cal. Gov. Code § 6254(k)).<sup>1</sup>
- E. The records contain information that is exempt from disclosure under California Government Code section 6255, as the public interest served in not disclosing the information clearly outweighs the public interest served by disclosure, as set forth in *Times Mirror Co. v. Superior Court* (1991) 53 Cal. 3d 1325; *Rogers v. Superior Court* (1993) 19 Cal. App. 4th 469; *California First Amendment Coalition v. Superior Court* (1998) 67 Cal. App. 4th 159.

Thank you.

Very truly yours,



Maricela E. Marroquin

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<sup>1</sup> Although the City cannot reproduce copyrighted material without the consent of the author, any copyrighted material will be made available for you to inspect in person at City hall. Please contact Jennifer Paige, Deputy Director of Planning and Community Development at (626) 744-7231 after September 30, 2019 to make arrangements to inspect any copyrighted material.