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I am petitioning to request that the current language for license mobility apply to all SEA's that have not yet been issued a license for a specific location. Some of us have selected a county, but the language states that license mobility applies to license recipients that have not been "issued" a license for a specific location. Most of the SEA's have not been issued a license for a specific location by definition of the language in the legislation for RCW 69.50.345. I am requesting rules be written to recognize the current legislation for SEA's as applying to all SEA's that have not yet been "issued" a license for a specific location.

We have selected counties, and some of those counties are completely locked out making the license useless if unable to be moved. By definition in RCW 69.50.345 all SEA licenses are mobile if not issued for a specific location. Technically many of us have not been issued a license for a specific location. And based on the current inability to find suitable real estate, some or many of us will not open before our grant money expires if this petition request for license mobility is not recognized and acted on.

I am also requesting that the legislation be changed so that SEA licenses remain mobile for the first five years so that we are not rushed into a poor location due to time pressures on using funds etc. This would give us a greater chance at success. Five years should provide plenty of time to achieve this goal.

The industry is changing fast and anything that holds up or completely restricts license recipients from opening should look like failure to everyone that wants to see this program succeed. Some of us are completely locked out of our county/cities due to prohibitions, bans and moratoriums. Most of us are having trouble finding real estate due to the buffers. Many of us are working with our county/cities to reduce buffers. But that will be a long and uncertain journey.

In the meantime, new licenses will be issued while we are trying to convince our county/cities to make changes. For those of us that are unable to convince our county/cities to make a change, we will possibly and for some of us, we will definitely lose out on this opportunity. The licenses

will be issued, time will have been wasted, money will have been spent and grants will be lost. All because the license holder was unable to open. It was beyond their control.

We have limited time to open and our grant money will expire if we do not use it in a timely manner. Every day we are not open is costing all SEA's money and time in their current pursuit. We are driving all over our counties knocking on doors to meet landlords that may own a building that might come up for lease in the future. Many of us have been searching for over six months to find nothing so far. This could easily continue until the next licenses are issued and allowed to open up.

Some of us are currently locked out of "ALL" real estate in our county/cities due to bans and prohibitions. Without license mobility they will lose this opportunity.

Most of us are faced with a lack of available real estate for lease. The licenses that we received were lost for one reason or another when the previous business owner went out of business, or never opened due to challenges finding suitable real estate. All SEA licenses should have been given mobility from the very beginning for this reason alone.

Prohibitions and bans have increased in many of our counties and cities. The entire landscape of availability should have been considered when reissuing these licenses.

The language states that all SEA's that have not been issued a license for a specific location qualify for mobile licenses. I think the rules should be clarified to reflect this as an understanding and the recognized interpretation of the current law. Which would make all SEA licenses mobile if they have not been issued a license for a specific location.

A concern that arises if this is not the recognized language, is that the next round of licenses that will be given out may have purchasing power for real estate. The next license recipients may buy real estate in our area and lock us out of our counties if we've reached the cap for the county. That could be solved immediately if the language included with the mobility which disregards the previous county limits, applies to all SEA's who have not been issued a license for a specific location. If the license mobility language applies to all license recipients, that removes any confusion as to what actions to take if one of the next license recipients were to lock us out of our county by taking up the allotted licenses for that county.

The Social Equity program in it's name is suggestive of how this should be handled in my opinion. All SEA's should be treated equally. If the new licenses will be able to locate in any county available to them, all Social Equity licenses should be treated the same.

Many of us are working on buffer changes within our county/cities. However, if approved, the changes could take a great deal of time to enact. We could all be waiting another six months to a year before we see a change, if any. My county has increased bans since i502 officially started in 2015. They have not reduced anything. I will consider myself extremely lucky if they do reduce any buffers.

The RCW quoted below states that it is the LCB's intention to make all licenses issued under the Social Equity program mobile/roaming licenses. And based on my interpretation, it should already include all the SEA's who do not currently have a location and a license officially "issued" to them for a specific location.

We are not officially issued a license for a specific location until we have a location for that license to be issued to. So for those of us that have not found real estate yet, the language on mobility should proactively apply to all SEA's that do not have a location yet. All SEA licenses should be mobile. And they should be able to open up in any county or city without consideration for the maximum number of retail cannabis licenses established by the board for each county under RCW 69.50.345. According to the stated legislation for the Social Equity program.

According to RCW 69.50.335

Line 1 section d-f

Line 1:

(d) In addition to the cannabis retailer licenses that may be issued under (a) of this subsection, beginning January 1, 2024, and until July 1, 2032, the board may issue up to 52 cannabis retailer licenses for the social equity program.

(e)(i) At the time of licensure, all licenses issued under the social equity program under this section may be located in any city, town, or county in the state that allows cannabis retail, cannabis production, or cannabis processing business activities, as applicable, at the proposed location, regardless of:

(A) Whether a cannabis retailer license, cannabis producer license, or cannabis processor license was originally allocated to or issued in another city, town, or county; and

(B) The maximum number of retail cannabis licenses established by the board for each county under RCW 69.50.345.

(ii) The board must adopt rules establishing a threshold of the number of licenses created by this section that can be located in each county.

(f) After a social equity license has been issued under this section for a specific location, the location of the licensed business may not be moved to a city, town, or county different from the city, town, or county for which it was initially licensed.

I am requesting the state/board amend the legislation for license mobility. Or write new rules to recognize the current language in RCW 69.50.335 to clarify that the legislation covers all SEA's in regards to mobility and the ability to disregard the maximum number of licenses assigned to a county so we can move our license anywhere in the state where a city or county is welcoming.

I would also request that for optimal success in our endeavors, all licenses remain mobile as long as they are owned by the original SEA's, or at a minimum for five years. We are faced with a lack of available options for real estate. Many of us will select locations to open our stores that work within our budgets and abilities. However three to five years after we open, most of us should be looking to purchase real estate with our earnings in my opinion. And this gives everyone time to make an educated business decision, pick the best location and negotiate a fair price for real estate. This will lead to much greater success for the program and everyone involved. Currently we are under time pressure and that often leads to poor decisions. I am asking for a minimum of five years of mobility with our license until the day we are able to take on partners.

I am requesting that this line be stricken from the legislation for RCW 69.50.335:

“(f) After a social equity license has been issued under this section for a specific location, the location of the licensed business may not be moved to a city, town, or county different from the city, town, or county for which it was initially licensed.”

And replaced with:

“After a social equity license has been issued under this section for a specific location, the SEA has five years of license mobility from the date the license is considered active and may relocate anywhere in the state within any welcoming jurisdiction during that time. After five years the location of the licensed business may not be moved to a city, town, or county different from the city, town, or county for which it is licensed after the five years have passed.