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**CITY OF LOS ANGELES  
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November 11, 2025

Los Angeles Department of City Planning  
Office of Zoning Administration, 7<sup>th</sup> Floor  
200 North Spring Street  
Los Angeles, California 90012

VIA EMAIL

RE: **Planning Case No:** ZA-2025-541-CUB  
**Project Address:** 655 S Flower St, Los Angeles, CA 90017  
**Applicant:** Loay Lazghoul

**Project Description:** A CUP to allow the sale and dispensing of full line of alcoholic beverages for off-site consumption in conjunction with an existing 2,182 sq. ft. market.

Dear Zoning Administrator:

At our regular public meeting on November 11, 2025, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to **oppose** the Applicant's requests in Planning Case No. [ZA-2025-541-CUB](#).

DLANC's **position of opposition** is based on communications received from the Los Angeles Police Department (LAPD) and members of the public documenting instances of loitering, the open sale and distribution of narcotics, acts of violence occurring outside the business establishment, and the owner/operator's lack of cooperation with the LAPD in law enforcement investigations.

The LAPD has reported that the owner/operator has repeatedly failed to comply with State and Municipal laws regarding the sale and dispensing of tobacco products. Multiple enforcement actions during the summer of 2025 resulted in citations and ongoing investigations by the LAPD Central Division Vice Unit.

This continued pattern of violations and disregard for regulatory compliance suggests the

applicant's inability to adhere to the law. DLANC is concerned that granting permission to sell alcoholic beverages for off-site consumption would likely lead to similar noncompliance with Conditional Use Permit conditions and Alcoholic Beverage Control requirements.

Additionally, the owner/operator's ongoing failure to manage quality-of-life and nuisance issues tied to their existing convenience store and smoke shop operations raises further concern about their capacity to prevent problems such as loitering or on-site drinking that may be amplified as a result of the off-site sale of alcohol.

Therefore, in DLANC's view, the information presented provides sufficient justification for the **denial of the applicant's Conditional Use Beverage (CUB) application**. However, should the Los Angeles Department of City Planning choose to approve the applicant's request, DLANC strongly recommends that the Zoning Administrator impose the following conditions set forth below, as well as any additional conditions recommended by the LAPD or the respective Council District Office.

- CONDITION 1:** Storefronts of ground floor retail retain transparency at all times to allow for eyes on the street and pedestrian safety.
- CONDITION 2:** Owner/Operator will come back and present to DLANC PLUC should the owner/operator change.
- CONDITION 3:** Any amplified or outdoor noise shall be mitigated such that it will remain in compliance with the LA Noise Ordinance.
- CONDITION 4:** Owner/Operator shall work with the property owner to install multiple "No Loitering or Public Drinking" signs outside of the subject facility, compliant with LAMC Sec. 41.24. Additionally, the Owner/Operator shall file and have a valid Trespass Arrest Authorization form recorded with the LAPD Central Division. The Owner/Operator shall present a copy of the recorded Trespass Arrest Authorization form to the satisfaction of the Department of City Planning as a condition of approval.
- CONDITION 5:** Owner/Operator shall work with the property owner to install additional architectural, area, or security lighting along the Flower Street frontage and the portion of the northside of the building fronting the adjacent structure at 800 Willshire.
- CONDITION 6:** Owner/Operator shall provide the Department of City Planning and LAPD with a copy of the security plan that shows regular exterior perimeter security checks. The Owner/Operator shall also provide additional security monitoring devices, such as PTZ cameras, to be installed along the perimeter of the subject facility, including adequate camera coverage of the adjacent portion of the exterior adjacent to 800 Willshire.
- CONDITION 7:** Owner/Operator shall ensure a camera surveillance system is operating at all times to monitor the interior, entrance, exit, and exterior areas, in front of and around the premises. Recordings shall be maintained for a minimum period of 30 days and are intended for use by the LAPD.

- CONDITION 8:** Owner/Operator shall meet with the LAPD Central Division and comply with any additional conditions set forth by the LAPD as a condition of approval. The CUB grant shall also be conditioned on presenting proof to the Zoning Administrator and the Department of City Planning that the applicant has met with the LAPD and has addressed any public safety concerns tied to their operations before the effectuation of the CUB grant.
- CONDITION 9:** Owner/Operator shall retain an on-site security guard at all hours of operations. The security guard shall routinely patrol the exterior of the property.
- CONDITION 10:** Owner/Operator shall not sell wine coolers, malt beverages, or pre-mixed distilled spirit cocktail beverages in single containers of 16 oz. or less and must be sold in manufacturer prepackaged multi-unit quantities.
- CONDITION 11:** Limit the hours of operation from 10 am to 12 am daily.
- CONDITION 12:** Within the first 12 months of the issuance of the grant, a MViP inspector will conduct a site visit to assess compliance with, or violations of, any of the operating standards. A second inspection shall take place after 24 months of the first inspection.
- CONDITION 13:** The applicant shall file for a Plan Approval no sooner than 48 months (4 years) and no later than 60 months (5 years) of the effectuation of the determination.

If possible, please send a digital copy of your decision letter via e-mail to [pluc@dlanc.com](mailto:pluc@dlanc.com) in lieu of a hard copy. Thank you in advance for your consideration of the comments presented in this letter.

Sincerely,



Jens Midthun  
President,  
DLANC



Andrew Wong, AIA  
Chair,  
DLANC Planning & Land Use Committee

Cc:

Kevin Ocubillo, Council District 14 (via email)  
Sgt. Alejandro De La Torre, LAPD Central Division (via email)