

### **DECLARATION OF ADAM KOSLIN**

I, Adam Koslin declare:

1. I am over eighteen years of age and am competent to testify as stated herein. The matters stated herein are personally known to me, except where stated on information and belief. Where stated to be on information and belief, I believe the matters contained herein to be true. If called as a witness, I would competently testify to the matters stated herein.
2. This Declaration is made in support of the appeal of 7-Eleven, Inc., Chaar, Inc., and Anil Ali from the Letter of Determination issued by the Los Angeles City Zoning Administrator, dated March 7, 2023, in Case No. DIR-2020-954-RV which erroneously found the property at 6701 W. Santa Monica Boulevard, Los Angeles, CA 90038 to be a public nuisance and imposed numerous operating conditions on it.
3. I am employed as an associate attorney in the law offices of Solomon, Saltsman & Jamieson; attorneys of record herein for 7-Eleven, Inc., Chaar, Inc., and Anil Ali; operators of the property at issue in the above-referenced matter.
4. I visited the Los Angeles Planning Department's Records Management Unit on July 25, 2022, December 7, 2022, for the purpose of reviewing all materials in the casefile for the instant matter. These visits were made pursuant to appointments registered with and confirmed via the BuildLA appointment system.
5. During these visits I was shown several folders containing documents which were represented to contain the entire casefile for the above-referenced matter, and was allowed to review each document contained therein.
6. At no time during my inspections did I see any documents in the casefile any reference to the following documents and/or information referenced in the Zoning Administrator's Letter of Determination:
  - a. Investigation(s) performed by the office of the Zoning Administrator during the month of May, 2022, at the Subject Property or any comparator properties;
  - b. Los Angeles Police Department records of criminal activity near the Subject Premises on March 9, 2023; or
  - c. A timeline of "reported incidents" at various 7-Eleven stores separate and distinct from the subject premises, obtained from unnamed "authorities" (*See* ZA Letter of Determination, pg. 14);
  - d. Twelve (12) news-media articles referencing allegations of criminal activity at 7-Eleven stores not related to the subject premises and located in other cities.
7. None of the above-referenced documents and/or information were otherwise provided to Solomon, Saltsman & Jamieson prior to the issuance of the Zoning Administrator's Letter of Determination dated March 7, 2023.

8. Each of the above-referenced documents and/or information was referenced and relied upon in the Zoning Administrator's Letter of Determination, dated March 7, 2023.
9. On March 16, 2023, I again visited the Los Angeles Planning Department's Records Management Unit, for the purpose of reviewing all materials in the casefile for the instant matter. This visit was also made pursuant to an appointment registered with and confirmed by the BuildLA appointment system.
10. During this visit, I again did not observe any documents or information regarding the matter referenced in paragraph 5(a) or 5(c) in the casefile. However, I did observe the documents referenced in paragraphs 5(b) and 5(d) in the casefile. Their pages were loose, unattached to any communication or other document, and were not accompanied by any transmittal of record of how and/or by whom they came to be placed in the casefile.

I declare under the penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed this 17th day of March, 2023 at Los Angeles, California

  
ADAM KOSLIN