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December 24, 2025

NOTICE OF APPEAL

City Clerk's Office

Office: Redondo Beach City Clerk

415 Diamond Street,

Redondo Beach, CA 90277

City Clerk: Eleanor.Manzano@redondo.org

General City Clerk Email: cityclerk@redondo.org

**Re: Notice of Material Breach of Appeal Manhattan Beach Smoke Shop, Inc,
License number 330177; 2205 Artesia Blvd., Unit A, Redondo Beach, California
90278. Administrative Hearing December 10, 2025; Decision December 19,
2025. NOTICE OF APPEAL TO CITY COUNCIL (RBMC § 6-1.27(b))**

Dear Ms. Eleanor Manzano:

PLEASE TAKE NOTICE that Manhattan Beach Smoke Shop, Inc. ("Appellant") hereby appeals to the City Council of the City of Redondo Beach from the written decision issued by the Hearing Officer, Luke Smude, following the administrative hearing conducted on December 10, 2025, concerning the temporary and permanent revocation of Business License No. 330177.

This appeal is filed pursuant to Redondo Beach Municipal Code section 6-1.27(b) and is timely made within ten (10) business days of service of the Hearing Officer's written decision.

GROUND'S FOR APPEAL

This appeal is based on, without limitation, the following grounds, which are stated summarily and will be further addressed during City Council review:

The decision is not supported by substantial evidence in the administrative record as a whole.

1. The proceedings failed to provide a fair hearing as required by law.
2. The Hearing Officer abused discretion and/or acted in excess of jurisdiction.
3. The penalty imposed is arbitrary, disproportionate, and excessive under the circumstances.

Kam Kooshki*
Sammy Zreik

*Admitted in Washington D.C.

4. The City failed to properly apply and reconcile governing provisions of the Redondo Beach Municipal Code and applicable state law.

Procedural inconsistencies and conflicting guidance within the City's administrative materials deprived Appellant of clear notice and due process.

Appellant expressly reserves all rights, arguments, objections, and remedies available under state and federal law, including but not limited to judicial review pursuant to Code of Civil Procedure section 1094.5.

REQUEST FOR RECORD

Appellant hereby requests that the entire administrative record be prepared and transmitted to the City Council for review, including but not limited to:

1. The hearing audio or video recording (if any)
2. All exhibits admitted or considered by the Hearing Officer
3. All reports, memoranda, and documents relied upon by City staff
4. The written decision and notice of revocation

STATUS OF BUSINESS

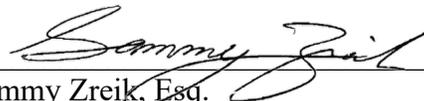
Appellant acknowledges that, pursuant to RBMC § 6-1.27(b), the business remains subject to the Hearing Officer's decision during the pendency of this appeal, and files this Notice without waiver of any challenge to the legality or enforcement of that condition.

Reservation of Rights. Nothing in this letter shall be construed as a waiver of any right, remedy, or cause of action, all of which are expressly reserved.

Please direct all communications regarding this matter to the undersigned. Lessee remains willing to resolve this dispute amicably and invites Lessor's prompt response.

Nothing in this letter shall be deemed a waiver of any and all legal claims, causes of action, or remedies available to Lessee under applicable law. All rights and remedies are expressly reserved.

Sincerely,



Sammy Zreik, Esq.

WHITBECK, KOOSHKI & ZREIK L.L.P
Attorney for Manhattan Beach Smoke Inc.,