



**ALESHIRE &  
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April 1, 2020

**VIA EMAIL & U.S. MAIL**

Lawrence R. Bynum, Esq.  
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A Professional Corporation  
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Re: Notice of Criminal Violations of Perris Municipal Code  
(4605 Wade Ave., Perris, CA 92571)

Dear Mr. Bynum:

As you are aware, this firm represents the City of Perris as its City Prosecutor and in that capacity enforces the Perris Municipal Code ("PMC") and Perris Zoning Code ("PZC"). Pursuant to our email exchange on March 31, 2020, communications were had between your client, Dynamic Meds, Inc., and City staff regarding necessary corrective actions to be taken to achieve compliance by the dispensary. The continued violations consist of:

- Failing to obtain a business license for Dynamic Meds operating on the property. (PMC § 5.04.010)
- Operating a business without first obtaining a certificate of occupancy. (PMC §§ 16.20.090, 19.50.020(a).)

Violation of City law must be taken seriously. Violations of the City Code may constitute criminal misdemeanors punishable by imprisonment of up to six months and by a fine of up to \$1,000 for each offense. Every day that this property violates the City Code it constitutes a separate offense. Thus, for example, for a violation lasting one week, the owner and occupant each face a fine of up to \$7,000. The City does not favor criminal prosecution of Code violators. The City uniformly seeks cooperation because compliance with the City Code, rather than punishment, is the primary objective. However, the City will enforce its laws.

This letter will serve as your client's ***FINAL NOTICE*** to cure the above violations before we consider taking further legal action. The City has already provided your client with notices and opportunities to correct the Code violations at the property. The City has made a diligent attempt to obtain your client's cooperation in complying with the Code. As the owner of the property or as the party responsible for the above-mentioned violations, your client is

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individually responsible to correct the stated violations. If your client does not promptly comply with the law, the City will have no choice but to pursue taking further action.

In order to bring the property into compliance with City codes your client must take the following corrective action by **April 22, 2020**:

- Contact the City's Planning Department to take all necessary steps to obtain a Certificate of Occupancy for the dispensary, Dynamic Meds, Inc.
- Once the Certificate of Occupancy is obtained, contact the City's Business License Department at 951.943.6410 ext. 262 to obtain a business license for Dynamic Meds, Inc. being operated on the property.

We look forward to and expect your client's complete cooperation in this matter. Should you have any questions regarding how to bring the property into compliance with the Code, please contact John Parker, Code Enforcement Officer, at 951.385.4131.

Very truly yours,

ALESHIRE & WYNDER, LLP



Robyn K. Moore Hubbard  
Paralegal

RKM/H

cc: Ms. Clara Miramontes, Assistant City Manager (via email)  
Mr. Robert Trejo, Code Compliance Supervisor (via email)  
Mr. Nathan Perez, Assistant Planner (via email)  
Mr. John Parker, Code Compliance Officer (via email)  
Mr. Eric Dunn, City Attorney (via email)