

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

BEFORE THE HEARING EXAMINER  
FOR THE CITY OF REDMOND

In the Matter of the Appeal of  
**Andorra Ventures LLC**  
Of Building Permit BLDG-2020-01804

NO. BLDG-2020-01804  
**REPLY DECLARATION OF  
LOGAN BOWERS IN SUPPORT  
OF PLAUSIBLE PRODUCTS, LLC,  
D/B/A HASHTAG CANNABIS'S  
MOTION FOR SUMMARY  
JUDGMENT**

I, Logan Bowers, state as follows:

1. I am over 18 years of age and am competent to testify to the matters stated herein. I make this declaration based on personal knowledge and based on my knowledge of the pertinent files and records.

2. I am a member of Plausible Products, LLC, d/b/a Hashtag Cannabis (“Hashtag”).

3. Hashtag submitted a change-of-location application to the Washington State Liquor and Cannabis Board (“WSLCB”) in mid-December 2019. As required by WAC 314-55-020(3), Hashtag posted a notice on the Building advising the public that it was seeking WSLCB approval to operate a marijuana retail business on the Property. Hashtag posted this notice for fourteen days beginning on January 9, 2020. The City of Redmond approved

1 Hashtag's change-of-location application on January 17, 2020, and the WSLCB approved it on  
2 January 22, 2020. On March 18, 2020, Hashtag applied to the WSLCB for a license to operate  
3 its retail marijuana business on the Property. Hashtag received its license from the WSLCB on  
4 May 11, 2020. As far as I know, Andorra Ventures LLC submitted no comments to the  
5 WSLCB regarding either of Hashtag's applications.

6 4. Hashtag opened its Redmond Store on May 15, 2020. It was still building out  
7 the Store in March 2020, and had no revenue and no customers that month. The sales and  
8 customer numbers that Andorra cites at pages 5 and 8 of its Omnibus Response to Dispositive  
9 Motions are for Hashtag's Seattle location. In June 2020, Hashtag's Redmond Store had only  
10 \$170,144.32 in revenue and 4,761 customers—about 159 per day, or 12 per hour. Many of  
11 these customers carpoled, or arrived via public transportation or on foot. And many of them  
12 simply dropped in to pick up online orders, only staying for a few minutes.

13 I swear under penalty of perjury under the laws of the State of Washington that the  
14 foregoing is true and correct.

15 DATED this 6th day of July, 2020 at Seattle, Washington.

16  
17   
18 \_\_\_\_\_  
19 Logan Bowers

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Hearing Examiner Sharon Rice  
6 c/o Kalli Biegel, Deputy City Clerk  
7 City of Redmond  
8 PO Box 97010  
9 M/S: 3NFN  
10 Redmond, WA 98073  
11 Phone: (425) 556-2191  
12 Fax: (425) 556-2198  
13 Email: [kbiegel@redmond.gov](mailto:kbiegel@redmond.gov)

Via E-Mail

14 *Hearing Examiner*

15 Ms. Vicki Orrico  
16 Johns Monroe Mitsunaga Koloušková, PLLC  
17 11201 SE 8<sup>th</sup> Street, Suite 120  
18 Bellevue, WA 98104  
19 Phone: (425) 451-2812  
20 Fax: (425) 451-2818  
21 Email: [orrico@jmmlaw.com](mailto:orrico@jmmlaw.com)

Via E-Mail

22 *Attorneys for Appellant Andorra Ventures*

23 Mr. James Haney  
24 Ogden Muphy Wallace, PLLC  
25 901 5<sup>th</sup> Avenue, Suite 3500  
26 Seattle, WA 98164  
27 Phone: (206) 447-7000  
Fax: (206) 447-0215  
Email: [jhaney@omwlaw.com](mailto:jhaney@omwlaw.com)

Via E-Mail

*Attorneys for City of Redmond*

DATED this 7th day of July, 2020 at Seattle, Washington.



Rondi A. Greer