



MEMORANDUM

DATE: September 15, 2023
TO: William Koch, Deputy Director, Community and Local Equity Grants Unit
FROM: Steve Dunncliff, Interim Director, Cannabis
SUBJECT: Cannabis Equity Grants Program for Local Jurisdictions – Local Jurisdiction Program Criteria Review

Dear Mr. Koch,

The Mendocino County Cannabis Department would like to respond to the review of the County's local equity program's 5-mile radius eligibility criterion. Mendocino County is a rural county with a land area of 3,509 square miles. Between 1984 and 1996, Mendocino was one of the top two California counties, by a significant margin, in plants eradicated by the Campaign Against Marijuana Planting (“**CAMP**”).

Mendocino County's experience with CAMP raids and the historical criminalization of cannabis engendered a widespread and deep-seated multi-generational mistrust of government and regulation that significantly inhibits efforts to transform the legacy cannabis culture and economy into a legal, regulated commercial cannabis market. Further distrust of the government was engendered by the Federal subpoena of the County's "zip tie" program. Although the names of farmers were not disclosed, some see the County's effort to reduce impacts on the community as becoming an informant of the community it was trying to protect.

Working with Humboldt County and the California Center for Rural Policy (“**CCRP**”), the 5-mile radius was developed as a recommended eligibility criteria for the Cannabis Equity Assessment based on the following: (1) a data-based review of the historic impacts of the illegalization of cannabis on the community, (2) to provide an avenue to help community members who have been disproportionately affected by cannabis prohibition successfully enter the legal cannabis workforce, (3) and a route to assure that there is equity and diversity in the emerging cannabis industry.

In an interview published in *Cash Crop: An American Dream* by Ray Raphael, CAMP commander Bill Ruzzamenti made clear that community disruption was a goal of the CAMP raids. In that interview, he spelled out that CAMP was going after "community support systems" in an attempt to eradicate all prohibited cannabis farms. Specifically, he stated that "the situation that's developed in southern Humboldt and northern Mendocino particularly is that you have vast enclaves of marijuana growers... We're going after the community support system that makes it appear as a viable and legitimate enterprise since everyone around you is doing it". Raphael, Ray, *Cash Crop: An American Dream*, The Ridge Times Press, 1985.

Acting on this broad assumption about the nature of Mendocino County, communities were disrupted by regular paramilitary raids that disproportionately targeted Mendocino County. In the



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case of *National Organization for Reform Marijuana Laws (NORML) v. Mullen*, several individuals who suffered injuries from CAMP activities provided declarations stating that "warrantless searches and seizures, arbitrary detentions, and destruction of property, and sustained low-altitude helicopter activity resulting in repeated invasions of privacy, emotional distress, property damage, disrupted schooling and work, and general danger to the public." *National Organization for Reform Marijuana Laws (NORML) v. Mullen*, 608 F. Supp. 945, 950. Furthermore, the Plaintiffs contended that CAMP was "out of control" and had turned its areas of operations into "war zones." *Id.* This was demonstrated by the Plaintiffs by providing several instances of improper helicopter use at low altitudes to intimidate community members, regardless of whether enforcement actions were being conducted on that property.

As demonstrated above, the War on Drugs in Mendocino County intentionally affected and intimidated entire communities rather than just the individuals who were convicted. The 5-mile criterion allows a critical eligibility avenue for those individual applicants who were personally impacted by the War on Drugs but not personally convicted to receive the funding needed to enter the legal cannabis market. Keeping this eligibility criterion in place will reduce barriers to the distribution of funds, ensure timely distribution of those funds, and assist those in Mendocino County who were disproportionately affected by CAMP raids and the War on Drugs.

Thank you.