



# STAFF REPORT

## PLOT PLAN NO. 990 MODIFICATION CONDITIONAL USE PERMIT NO. 544 AND VARIANCE NO. 24-06

**TO:** Planning Commission

**FROM:** Economic Development and Planning

**DATE:** November 20, 2024

**CASE NO.:** Variance No. 24-06

### APPLICANT REQUEST:

Requests: Consideration modify Variance No. 21-01 to increase the height of the freestanding readerboard by an additional 36 feet and increase the size of the readerboard by an additional 528 square feet per side.

**LOCATION:** 6300 Telegraph Road  
Commerce, CA 90040

**APPLICANT:** Morley Justman  
5819 Telegraph Road  
Commerce, CA 90040

**STAFF RECOMMENDATION:** Planning Commission to consider approval of Variance No. 24-06 with the Specific Findings.

**PUBLIC HEARING NOTICE:** The Public Hearing Notice was published in the Los Cerritos Community News on November 8, 2024, and mailed to property owners within 500 feet of the project site.

**ATTACHMENTS:** A) Specific Findings for Variance  
B) Plans

### LAND USE, ZONING AND APPLICABLE REGULATIONS:

#### Project Site – 6300 Telegraph Road

General Plan Designation:	Industrial
Zoning:	M-1 (Light Industrial)

Applicable Zoning Regulations:	Commerce Municipal Code (CMC) Chapter 19.11, Manufacturing Zone; CMC Chapter 19.39 Administration of the Zoning Ordinance; CMC Section 19.39.480 Variance; CMC Section 19.39.510 Required Findings; CMC Chapter 19.25 Signs.
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**SURROUNDING ZONING AND LAND USES:**

Direction	Zoning	Land Use
North	C2 Unlimited Commercial	Retail/Commercial
South	Caltrans Property	Interstate Five
East	C2 Unlimited Commercial	Water District
West	C2 Unlimited Commercial	Vacant Office Bldg.

**ENVIRONMENTAL ASSESSMENT:**

This project has been determined to be exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act (Title 14, Chapter 3, Section 15311, Class 11, Accessory Structures). This section specifically applies to the construction or replacement of minor structures accessory to commercial facilities such as projecting signs. In this case, the applicant is proposing an increase in height and sign area for the previously approved readerboard.

**DESCRIPTION OF PROPERTY:**

The subject site is a parcel located at the southeast corner of Washington Boulevard and Telegraph Road and measures approximately 2.88 acres (125,375 square feet). It is generally flat in nature and is situated in the City’s Light Industrial Zoning District (M-1), surrounded by retail to the north and office use to the west. Previously the site was developed with a multi-story hotel (Hyatt House Hotel), which has since been demolished. On July 25, 2018, a Plot Plan review was approved to allow the construction of a manufacturing building measuring 77,688 square feet.

## **ANALYSIS:**

### **Background**

On July 25, 2018, the Planning Commission for the City of Commerce (“Planning Commission”) considered and approved a Plot Plan to allow for the construction of a light industrial building measuring 77,688 square feet and during the Summer of 2021, the applicant initiated construction activity at the subject site, with various of the concrete walls being erected over this time.

On October 27, 2021, the Planning Commission approved a request to modify some items that were considered as part of the original proposal as well as a comprehensive sign plan to compliment the proposed building. The Planning Commission approved Plot Plan No. 990 (modification), Conditional Use Permit No. 544 and Variance No. 21-01. The Variance under Variance No. 21-01 approved four variances to: (1) Allow for a 1,344 square foot readerboard sign to exceed the allowable sign area; (2) A request to allow a readerboard sign to exceed the allowable height by 33 feet; (3) Allow four wall signs, where code allows for no more than three wall signs; and (4) A request to allow for both a freestanding readerboard sign and wall sign, where Code only allows one sign-type within the M-1 Zoning District.

During the preliminary review of the plans, it was determined that the proposed signage did not conform to other requirements of the Code. Specifically, the new request for the proposed signage exceeds the previously approved variance which allowed for the freestanding readerboard an additional 3 feet of height. City’s sign standards on allowable square footage area, and height, therefore the applicant is also seeking approval of two Variances under Variance No. 24-06.

Pursuant to Chapter 19.39 Division 8 of the Commerce Municipal Code (CMC) review and approval of a Variance by the Planning Commission is required.

On September 18, 2024, the Planning Commission held a public hearing and took testimony on the matter of Variance No. 24-06 (increased height and face area of readerboard). After deliberation and after the public hearing, the Planning Commission raised a few questions/concerns and continued the item. The Planning Commission directed staff to look into and address the following items:

1. Survey other Cities with digital readerboards along the I-5 Interstate to determine if there is a time limit or cut-off time for readerboard operation or are readerboards allowed to run 24 hours.
2. Are readerboards required to dim the brightness of the readerboard display during evening hours to limit and minimize glare from the freeway.
3. Can the proposed sign be moved around on the site to determine if a lower height can be incorporated as opposed to 100 feet as the proposed.

Staff had the opportunity to follow up and look into the concerns raised by the Planning Commission at the September 18, 2024 meeting. In this regard, planning staff contacted the following 5 cities, Buana Park, Lynwood, Montebello, and Santa Fe Springs, which are neighboring cities with LED readerboards along the I-5 and I-710 freeways. All 5 cities indicated that they did not have hour restrictions on their readerboard signs. Also, the readerboard signs in those 5 cities are off-premise display signs and were approved with Development Agreement with annual percentage Fees based on revenue generation. The proposed sign under Variance No. 24-06 is an on-premise sign and not subject to a percentage fee thus, the need to advertise for a 24 hour period is not prevalent. As a result, staff is proposing Condition No. 9 under Section 3 of the Resolution with cut-off time of 12:00 A.M. PST.

All LED readerboard signs have a dimming option as was confirmed by the 5 surveyed cities. It is customary that readerboard signs are dimmed during evening hours. Therefore, staff proposes condition No. 6 under Section 3 of the Resolution requiring dimming during evening hours.

The proposed height of 100-feet, which is the maximum height as allowed by Caltrans is proposed due to the existing building's location on the site and the many obstacles presented along this stretch of the I-5 freeway. The obstacles noted are the existing Caltrans' signs, existing billboard signs, and existing pylon signs. The applicant indicated that 85 feet as opposed to 100 feet may be a possibility however due the location and close proximity of the existing building to the freeway, it will minimize the readerboard's exposure to traffic along the I-5 freeway (See Exhibits E through I).

### **Project Description**

The applicant is requesting to modify Variance 21-01 in two areas, one to exceed the sign area and one to exceed the sign height. Variances are as follows:

#### **Variance One: Exceeding Freestanding Readerboard Sign Area**

Table 19.25.100A of the Commerce Municipal Code, subject to a CUP, permits a readerboard sign in nonresidential zones and with a sign area that is calculated based on lot street frontage (CUP No. 544 was previously approved by Planning Commission on October 27, 2021). More specifically, the maximum allowable sign area is calculated at one square foot per every five feet of street frontage and a maximum sign area of 500 SF. The street frontage facing Telegraph Road has a street frontage of 800 feet, resulting in a permissible sign area of 160 square feet. Variance 21-01, which was approved by the Planning Commission on October 27, 2021, increased the sign area (dual-face) by 1,184 SF to 1,344 SF (672 SF per side). The Sign was an industry standard 14' x 48' (see Exhibit "A"). Variance 24-06 proposes a dual-face freestanding LED on-premise readerboard sign, which measures 20 x 60 or 1,200 SF per side (double face total 2,400 SF), increasing the sign area by 1,056 SF from 1,344 SF to 2,400 SF (See Exhibit "B").

The applicant is requesting the additional sign area in order to ensure proper sign placement within the property and adjacent to Interstate Five (“I-5”). More specifically, the site is narrow and long as it runs adjacent to both Telegraph Road and Interstate Five. In addition, as the site tapers toward Washington Boulevard, there is also a grade drop-off when compared to the grade of the freeway. And last, the recently added right turn lane coming from Washington East onto Telegraph Road South required the applicant to dedicate a portion of his site to that lane. As a result of this, the applicant feels there is a unique situation to merit approval of the requested deviation.

### **Variance Two: Exceed the Height of a Freestanding Readerboard Sign**

Table 19.25.100A of the Commerce Municipal Code, allows for a freestanding sign at a height of 20 feet maximum at the front property line, plus one additional foot for each foot the sign is set back from the property line, but at a maximum height of 30 feet. Variance 21-01, which was approved by the Planning Commission on October 27, 2021, approved a dual-face freestanding LED on-premise readerboard sign to a height of 66 feet, or 36 feet over the allowable height. Variance 24-06 proposes to increase the height from 66 feet as approved under Var. 21-01 to 100 feet, which is an increase of 34 feet.

Per the applicant, the request to exceed the allowable height is to allow for the proper placement of a freestanding sign when seen adjacent to I-5 Freeway. In this case, the subject site is a long, narrow lot that has differing grades when measured adjacent to Interstate Five (I-5). At its extreme, the grade difference between the two is between 10-15 feet, depending on where the measurement is taken. In addition, current Caltrans signage obstructs the view of the sign at the 66-foot height as approved under Variance 21-01 as well as the location of the existing building and other signage along the I-5 freeway (See exhibits “C” & “D”). As a result, the subject site experiences exceptional circumstances because of the building location, Caltran’s signage, and the property abuts the interstate highway with its varying grade difference which limits the proper placement of signage when adjacent to the freeway. Therefore, the applicant’s request for additional sign height for the freestanding sign will allow for the proper placement of signage while limiting the potential for visual impacts when seen adjacent to Interstate Five. The need for additional height to is to overcome the visual obstructions. Caltrans reviewed and approved the placement, height, and sign area of the sign subject to the approval from the City of Commerce.

### **Variations**

When considering a variance for relief from the Zoning Code requirements, staff has to determine if there is a unique or special circumstance applicable to a property, including size, shape, topography, location, or surroundings, for which the strict application of the zoning ordinance deprives such property of privileges

enjoyed by other property in the vicinity and under the identical zoning classification.

As requested, the variances will permit an exception from the maximum square footage area, and height for the readerboard. The property owner will be allowed to use his/her property in a manner consistent with the established regulations, with variations.

When considering the request for unique or extraordinary conditions, staff first considered some of the site constraints, followed by topographic constraints as well as other unforeseen matters. In this case, the subject site is a long narrow lot that tapers both at its northern and southern terminuses. This results in a limited area for permissible improvements while complying with the Zoning Code. In addition, the topography of the subject site varies as there are changes when compared between the finished grade of the subject site where the building is compared to Interstate Five. More specifically, the site drops off approximately 15-plus feet when seen from Interstate Five which shows that the property is lower than the immediately adjacent Interstate Five freeway.

It is therefore because of these unique features that there is merit that shall be considered for the requested variances associated with the proposed sign program.

#### **CONCLUSION:**

Staff believes the necessary findings can be made to approve the minor changes to the variance. In addition, there is merit in considering the finding for the variance requested which includes exceeding sign square footage area, and height for a digital readerboard.

As discussed, the site is subject to a limited area for permissible improvements due to its topographic constraints as well as unique lot dimensions resulting in a long narrow lot that tapers both at its northern and southern terminus.

Therefore, staff recommends that the Planning Commission approve Variance No. 24-06 with the Specific Findings in Attachment A

Prepared by: Louis Morales, Director of Economic Development & Planning

Reviewed by: Noel Tapia  
City Attorney



**ATTACHMENT A  
SPECIFIC FINDINGS FOR  
VARIANCE NO. 24-06**

Pursuant to Section 19.39.510 of the Commerce Municipal Code, the following findings can be made:

**Variance One: Exceeding Readerboard Sign Area**

- 11. That the strict or literal interpretation and application of this Title 19 would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of this Title 19, or would deprive applicants of privileges granted to others in similar circumstances.** *The property is surrounded by properties that are zoned Unlimited Commercial. The subject variance request to allow a freestanding readerboard sign to exceed the sign area is to allow for signage that is designed and placed so that commuters can identify the location of the subject property with anticipation. The readerboard sign is proposed at the larger end of industry standard readerboard sizes. When considering the strict application of the code, the site is narrow and tapers on both ends. It also has a varying topography when compared to the grade of the freeway. In addition, the location of the existing building and existing Caltran's freeway signage visually blocked the visibility of the previously approved reader board signs prompting the need to increase the height of sign and sign area proportionately. The proposed variance will support the proposed light industrial use, and eliminate the practical difficulties of such use at this location.*
- 12. That there are exceptional or extraordinary circumstances or conditions applicable to the property involved or the intended development of the property that do not apply generally to other property in the same zone.** *There are only a handful of areas within the City that are zoned Light Industrial. The project experiences exceptional circumstance because it is surrounded by properties zoned Unlimited Commercial. The property is also narrow and long as it runs adjacent to both Telegraph Road and Interstate Five. In addition as the site tapers toward Washington Boulevard, there is a grade drop off when compared to the grade of the freeway. There is also a proposed right turn lane from east bound Washington onto Telegraph Road south that will require the applicant to dedicate land. As a result, there are exceptional or extraordinary circumstances or conditions applicable to the property involved or the intended development of the property that do not apply generally to other property in the same zone.*
- 13. That the granting of such variance will not constitute the granting of a special privilege inconsistent with the limitations on other properties**



*in the vicinity classified in the same zone. None of the other properties in the Light Industrial zone are surrounded by Unlimited Commercial properties or have a location adjacent to Interstate Five. The requested Variances, as conditioned, will allow the applicant to provide signage that will guide customers to the site. Any future requests will be subject to their own review and approval process. As mentioned, the applicant is requesting to provide signage intended to assist customers in locating the property.*

- 14. That the granting of such variance will not be materially detrimental to the public health, safety, or general welfare or injurious to property or improvements in the zone or neighborhood in which the property is located.** *The City's sign standards have been created to protect the public health, safety, and welfare, reduce confusion for the traveling public, and improve the appearance of the City. The proposal will allow the applicant to provide signage to direct customers to the property. The proposed new signs will be subject to the development standards of all applicable codes including Zoning, Building, Public Works as well as Fire, among others. Although the signs will be larger and higher than otherwise allowed, the applicant will be required to enter into a Settlement Agreement with the City and Successor Agency to the Commerce Community Development Commission. This agreement will enable the development of other properties within the same neighborhood that the City believes will be beneficial to the neighborhood in which the property is located and the general welfare. Accordingly, as conditioned herein, the variances will not be materially detrimental or injurious to the public health, safety, or general welfare or injurious to property or improvements in the zone or neighborhood in which the property is located.*
- 15. That the granting of such variance will not create an inconsistency with any objective contained in the general plan.** *The City's General Plan and zoning ordinance are consistent with one another. The zoning ordinance helps implement and carry out the goals and objectives of the City's General Plan. The proposed signage will promote the property/business by direct the customers to the site, unless Cal Trans approves off-site advertising. Land Use Policy 5.1 –encourages the City to continue to aggressively recruit those industrial activities, which are beneficial in terms of employment and revenue to the City and the surrounding region. Therefore, the proposal will not create any inconsistency with any objective contained in the General Plan since it will meet the objectives of the General Plan.*

**Variance Two: Exceed the Height of a Freestanding Readerboard Sign**

- 16. That the strict or literal interpretation and application of this Title 19 would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of this Title 19, or**

**would deprive applicants of privileges granted to others in similar circumstances.** *The subject variance request to allow a freestanding readerboard sign to exceed the height and sign area is unique in that the proposal is to allow for signage that is designed and placed so that commuters can identify the location of the subject property with anticipation. The property is surrounded by properties that are zoned Unlimited Commercial. When considering the strict application of the code, the narrow site tapers on both ends, along with having varying topography when compared to the grade of the freeway. In addition, the location of the existing building and existing Caltrans's freeway signage visually blocked the visibility of the previously approved reader board signs prompting the need to increase the height of sign and sign area proportionately. The proposed variance will support the light industrial use, and eliminate the practical difficulties of such use at this location.*

17. **That there are exceptional or extraordinary circumstances or conditions applicable to the property involved or the intended development of the property that do not apply generally to other property in the same zone.** *There are only a handful of areas within the City that are zoned Light Industrial. The project experiences exceptional circumstance because it is surrounded by properties zoned Unlimited Commercial. The property is also narrow and long as it runs adjacent to both Telegraph Road and Interstate Five. In addition, as the site tapers toward Washington Boulevard, there is a grade drop off when compared to the grade of the freeway. As a result, there are exceptional or extraordinary circumstances or conditions applicable to the property involved or the intended development of the property that do not apply generally to other property in the same zone.*
18. **That the granting of such variance will not constitute the granting of a special privilege inconsistent with the limitations on other properties in the vicinity classified in the same zone.** *None of the other properties in the Light Industrial zone are surrounded by Unlimited Commercial properties or have a location adjacent to Interstate Five. The requested Variances, as conditioned, will allow the applicant to provide signage that will guide customers to the site. Any future requests will be subject to their own review and approval process. As mentioned, the applicant is requesting to provide signage including, which may assist customers in locating the property and/or as may be approved by Cal Trans.*
19. **That the granting of such variance will not be materially detrimental to the public health, safety, or general welfare or injurious to property or improvements in the zone or neighborhood in which the property is located.** *The City's sign standards have been created to protect the public health, safety, and welfare, reduce confusion for the traveling public, and improve the appearance of the City. The proposal will allow the applicant to provide signage to direct customers to the property. The proposed new*

*signs will be subject to the development standards of all applicable codes including Zoning, Building, Public Works as well as Fire, among others. Although the signs will be larger and higher than otherwise allowed, the applicant will be required to enter into a Settlement Agreement with the City and Successor Agency to the Commerce Community Development Commission. This agreement will enable the development of other properties within the same neighborhood that the City believes will be beneficial to the neighborhood in which the property is located and the general welfare. Accordingly, the variances will not be materially detrimental or injurious to the public health, safety, or general welfare or injurious to property or improvements in the zone or neighborhood in which the property is located.*

- 20. That the granting of such variance will not create an inconsistency with any objective contained in the general plan.** *The City's General Plan and zoning ordinance are consistent with one another. The zoning ordinance helps implement and carry out the goals and objectives of the City's General Plan. The proposed signage will promote the property/business by direct the customers to the site. Land Use Policy 5.1 –encourages the City to continue to aggressively recruit those industrial activities, which are beneficial in terms of employment and revenue to the City and the surrounding region. Therefore, the proposal will not create any inconsistency with any objective contained in the General Plan since it will meet the objectives of the General Plan.*

**ATTACHMENT B  
CONDITIONS OF APPROVAL SPECIFIC FINDINGS FOR  
VARIANCE NO. 24-06**

**STAFF RECOMMENDATION:**

1. The use and development of the signs shall be in substantial conformance with the plan submitted with the application and marked Exhibit "A."
2. All conditions associated with Plot Plan No. 990 and CUP 544 shall continue to be valid and in effect.
3. This Variance approval granted herein is valid and in effect and granted pursuant to the provisions of Title 19 of the Commerce Municipal Code and shall be valid only on the property for which it was granted, only for the improvements for which it is granted, only for on-site signage, and shall continue to be valid upon change of ownership of the property or any lawfully existing building or structure on the property.
4. All conditions shall be binding upon the applicants, their successors and assigns; shall run with the land; shall limit and control the issuance and validity of certificates of occupancy; and shall restrict and limit the construction, location, and use and maintenance of all land and structures within the development.
5. This permit (Variances) all rights hereunder shall terminate within 12 months of the effective date of the permit unless construction is commenced or a written time extension is granted; based on a written request submitted prior to the expiration of the one-year period as provided in Section 19.39.460 of the Commerce Municipal Code.
6. All LED signage shall dim to an industry standard of \_\_\_% as determined and confirmed by Planning staff during evening hours so as that to limit glaring as seen from the Freeway.
7. All signage approved herein, shall at all times comply with the provisions of Chapter 19.25 (SIGNS) of the Commerce Municipal Code.
8. All cladding associated with the proposed signage shall be dull or opaque so that glaring is non-existent.
9. The LED readerboard sign will be for on-premise advertising only and will have a cut off time for readerboard displays of 12:00 A.M. PST.

10. The applicant is responsible of obtaining all necessary approvals and permits from Caltrans for the LED pylon sign.
11. The LED readerboard wall signs are permitted to advertise on-site activity. At no time, shall off-site advertising be permitted on any of the LED readerboard signs.
12. Where feasible and with prior consent, the applicant shall work with the City to allow for special event advertising on the signs approved herein.
13. In the event of transfer of ownership of the property involved in this application, the new owner shall be fully informed of the use and development of said property as set forth by this permit together with all conditions, which are a part thereof.
14. During construction, all roadways shall be kept open to traffic.
15. Equipment used for construction activities shall be properly tuned to reduce exhaust emissions.
16. Roads adjacent to the project site shall be swept as needed to reduce fugitive dust from the proposed project site.
17. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants.
18. Contractors and subcontractors engaged in the construction activities of the project shall obtain a business license and all required permits from the City of Commerce.
19. If the Director of Economic Development and Planning determines that a situation detrimental to the public health, safety, and welfare has arisen due to the subject operation, the Director may require changes to the operation, additional studies to be undertaken, and the implementation of additional measures to protect the public's interest.
20. The Director of Economic Development and Planning shall have the authority to initiate proceedings to suspend or revoke a Conditional Use Permit approval pursuant to provisions set forth in Sections 19.39.240 through 19.39.250, inclusive, of the Commerce Municipal Code, Chapter 19.39 if sufficient cause is given.
21. The operation must comply with all pertinent South Coast Air Quality Management District (SCAQMD) regulations, if applicable.

22. All required permits by all permitting agencies shall be obtained for operation of said use and any construction associated with the subject request.
23. Construction activities shall be permitted between the hours of 7:00 a.m. to 6:00 p.m.
24. Storage of materials related to construction activities shall be contained within the project site.
25. The project site shall be cleared of all debris prior to the issuance of a Building Department final inspection.
26. If applicable, Southern California Edison (SCE) requires the following conditions for any SCE services:
  - a. The applicant is responsible for contacting Southern California Edison (SCE) and arranging any electrical service at the appropriate stage of construction. The electrical design for the newly installed service shall be designed by SCE and approved by City of Commerce Building and Safety Division (CCBSD).
  - b. All on-site electrical service connections to the proposed improvements shall be designed using an underground (UG) design method. This avoids an overhead service connection.
  - c. All required SCE "equipment" needed to provide service to the proposed improvements (PME Switches, Transformers, and/or Capacitors) shall be installed in a "padmounted" configuration sitting above finished grade upon an approved SCE structure.
  - d. All required SCE "Cable" needed to provide service to the proposed improvements shall be installed utilizing UG conduits or cable trench as designed by SCE.
  - e. There shall be no newly installed overhead (OH) facilities across private property without the approval from the CCBSD.
27. If applicable, the project applicant shall install energy-efficient electrical appliances and equipment in accordance with the State of California's Energy Efficiency Standards (Title 24).
28. The applicant shall demonstrate how this proposal is in compliance with Division 23, Section 19.37.710, Art in Public Place.
29. In no circumstance, the building/property are permitted any more signage, unless a Variance is applied for and granted.
30. Violation of any of the conditions of the approval shall be cause for revocation and termination of all rights thereunder.

31. The Director of Economic Development and Planning or his/her designee is authorized to make minor modifications to the approved preliminary plans or any of the conditions if such modifications shall achieve substantially the same results as would strict compliance with said plans and conditions.
32. The Applicant shall sign, notarize, and return to the Economic Development and Planning Department an affidavit accepting all Conditions of Approval within 10 days from the date of the approval, unless appealed. The Applicant acknowledges and understands that all conditions set forth in this Resolution are conditions precedent to the grant of approval and failure to comply with any condition contained herein shall render this Condition Use Permit non-binding as against the City and shall confer Applicant no legal rights under the law.
33. The applicant shall defend, indemnify, and hold harmless the City, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding brought against the city, its elected and appointed officials, agents, officers, or employees arising out of, or which are related to the applicant's project or application (collectively referred to as "proceedings"). The indemnification shall include, but not be limited to, damages, fees and/or costs, liabilities, and expenses incurred or awarded in connection with the proceedings whether incurred by the applicant, the city, and/or the parties initiating or bringing such proceedings. This indemnity provision shall include the applicant's obligation to indemnify the city for all the city's costs, fees, and damages that the city incurs in enforcing the indemnification provisions set forth herein. The city shall have the right to choose its own legal counsel to represent the city's interest in the proceedings.

**ATTACHMENT D  
SIGNAGE PLANS AKA – EXHIBIT “A”**