



urbn leaf

City of Benicia  
Commercial Cannabis Retail Business Application

Point of Contact  
Chris Hester  
(916) 529-0028  
Hest916@gmail.com

City of Benicia  
250 East L Street  
Benicia, CA 94510  
Attn: Community Development Department

**RE: Letter of Intent - Request for Proposals: Cannabis Retail and Microbusiness Operators**

I, the undersigned, attest that I am a duly authorized representative of the cannabis business operator applicant, which is identified below:

<b>Name of Business:</b>	Urbn Leaf
<b>Address of Proposed Business Location:</b>	1401 E.5th Street, Benicia, Ca 94510
<b>Assessor's Parcel Number:</b>	0088092040
<b>Name of Applicant:</b>	Chris Hester
<b>Business Address of Applicant:</b>	3941 Park Dr. 20-626 El Dorado Hills Ca 95762
<b>Applicant Phone Number:</b>	(916)529 0028
<b>Applicant Email Address:</b>	Hest916@gmail.com

I understand that I will be expected to receive all notices at the Business Address of the Applicant and consent to receiving notices and communications at the phone number and email address listed above.

I am interested in starting a Retail cannabis business operation. Further, I attest that I have secured an agreement for the Proposed Business Location listed above, for a minimum of four (4) years, and that said location is eligible for cannabis business operations per City regulations.

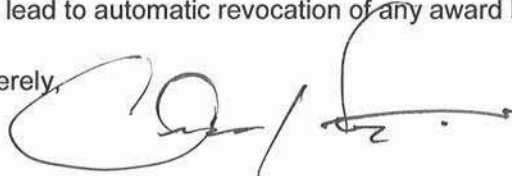
Please find enclosed a complete application for this cannabis business proposal, including:

- Summary Project Plan
- Preliminary Cannabis Application
- Cannabis Public Safety License Application
- One (1) payment of \$20,000 payable to the City of Benicia

If I am selected to submit for a CUP I will apply for this permit within 60 days of the receipt of the letter of authorization from the City of Benicia Community Development Department. I understand that failure to apply for the CUP within that time period automatically forfeits my opportunity to apply.

I further understand that failing to meet any of the requirements of the RFP or applicable City regulations shall lead to automatic revocation of any award letter.

Sincerely,





250 East L Street • Benicia, CA 94510 • (707) 746-4280 • Fax (707) 747-1637

## Community Development Department Planning Division

### PRELIMINARY CANNABIS APPLICATION

Administered by the Community Development Department, applicants seeking retail or microbusiness Cannabis Use Permits must submit a Preliminary Cannabis Application. Applicants must submit a vicinity map(s), and conceptual building site plans including but not limited to site plans, floor plans, roof plans, and building elevations. All applicants must complete the application that follows. The responses provided on this application will assist the review panel in evaluating Proposals for business viability and operational standards that the applicant intends to employ, and assess how they relate to building and zoning codes, City design standards, and other sections of the Benicia Municipal Code.

#### ACKNOWLEDGEMENTS

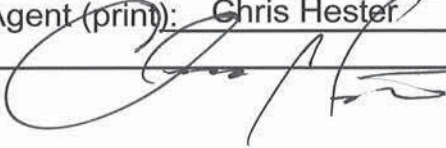
The applicant acknowledges that submitting this Application and associated documentation does not entitle them to a Cannabis Use Permit or a Cannabis Public Safety License, or grant them any rights or privileges to operate a cannabis business in Benicia. The applicant also acknowledges that all fees associated with this application are non-refundable, and that the Community Development Department will retain the authority to inspect and assess the business premises and property.

Entity/Applicant Name: URBN LEAF

Proposed Facility Address: 1401 E. 5th Street, Benicia, Ca 945101

Authorized Agent (print): Chris Hester

Title: Planning/Security Director

Signature: 

Date: 9/2/18

**APPLICANT: Complete all sections. Please print legibly.**

Project Address 1401 E. 5th St. Benicia, Ca 94510

APN (s) 0088092040 Cross Street E. N Streer Sq. ft./Acreage 18,750/.43

Applicant Name Chris Hester Company URBN LEAF

Street Address 3941 Park Dr. 20-262

City El Dorado Hills State Ca Zip Code 95762

Phone (916) 529 0028 Email Hest916@gmail.com

Owner's Name Will Senn Company URBN LEAF

Owner's Street Address 1028 Buenos Ave.

City San Diego State Ca Zip Code 92110

Phone (619) 346-0587 Email will@urbnleaf.com

**Additional Contact Information**

Architect Velerie Ehrke (530) 681-1218

Engineer \_\_\_\_\_

Other \_\_\_\_\_

**If additional owners, please add them below.**

Owner's Name Sidney Dunmore Company URBN LEAF

Owner's Street Address 3941 Park Dr. 20-262

City El Dorado Hills State CA Zip Code 95762

Phone (916) 212 - 2107 Email Sid.wrf@gmail.com

Owner's Name CHRIS HESTER Company URBN LEAF

Owner's Street Address 3441 PARK Dr.

City EI DORADO HILLS State CA Zip Code 95762

Phone \_\_\_\_\_ Email \_\_\_\_\_

Owner's Name \_\_\_\_\_ Company \_\_\_\_\_

Owner's Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Phone \_\_\_\_\_ Email \_\_\_\_\_

Owner's Name \_\_\_\_\_ Company \_\_\_\_\_

Owner's Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Phone \_\_\_\_\_ Email \_\_\_\_\_

### **Proposed Project**

Please complete this chart. If an item is included, or will be changed as part of the project, please elaborate.

	No	Yes	Explanation
Tenant Improvements		X	Yes we will completely remodel the interior of the building
Parking		X	Yes we have 10 onsite spaces
<ul style="list-style-type: none"> <li>New Spaces</li> </ul>		X	Yes we will provide for 10 onsite spaces
<ul style="list-style-type: none"> <li>Removing Spaces</li> </ul>	X		No
Improvements and/or Structures in Public Right-of-Way	X		No
Exterior		X	See Below
<ul style="list-style-type: none"> <li>Building Modifications</li> </ul>		X	New exterior Stucco and Paint
<ul style="list-style-type: none"> <li>Mechanical Equipment</li> </ul>		X	We will update the Air Filtration system per the Odor Plan
<ul style="list-style-type: none"> <li>Lighting</li> </ul>		X	We will update the lighting to provide for security
Masonry	X		No
Land		X	See below
<ul style="list-style-type: none"> <li>Grading</li> </ul>	X		No
<ul style="list-style-type: none"> <li>Landscaping</li> </ul>		X	Yes, we will update the current landscaping
<ul style="list-style-type: none"> <li>New Trees</li> </ul>		X	Yes, we will add new trees to our landscaping
<ul style="list-style-type: none"> <li>Removing Trees</li> </ul>	X		No
Hazardous Materials	X		No

**Operational Plans**

Please complete this chart. If an item is included, or will be changed as part of the project, please elaborate.

	No	Yes	Explanation
Number of Estimated Employees		X	We anticipate having 30 full time and part time employees
Proposed Hours of Operations		X	10am to 9pm / 7 days a week
Production of Edible and/or Consumable Products	X		No
Noise to be Generated On-Site	X		No
Cannabis-Related Mechanical Equipment	X		No, besides air filtration equipment
Outdoor Storage and/or Uses	X		No
Use or Storage of Hazardous Materials	X		No
Transportation Plans	X		No
Expected Occupant/Tenant Traffic		X	200 visitors per day
Cannabis Delivery and/or Distribution		X	Yes , we will have a delivery service
Proposed Delivery and/or Distribution Hours		X	10am to 9pm / 7 days per week

**THIS IS A PRELIMINARY CANNABIS APPLICATION FORM AND NOT A BUILDING PERMIT OR PLANNING OR ENGINEERING APPLICATION. ADDITIONAL SITE PLANS & DETAILED INFORMATION WILL BE REQUIRED WITH THE PLANNING APPLICATION AND/OR PERMIT APPLICATION.**

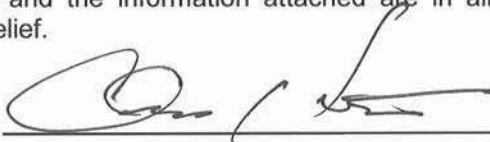
**INDEMNIFICATION:**

Applicant agrees to defend, indemnify, and hold harmless the City and its officers, contractors, consultants, employees, and commission members (collectively, "City") from any and all liability, loss, suits, claims, damages, costs, judgments and expenses (including attorney's fees and costs of litigation), including any appeals thereto (collectively, "proceeding") brought against the City with regard to any approvals issued in connection with the application(s) by the City, including any action taken pursuant to the California Environmental Quality Act. If Applicant is required to defend the City in connection with such proceeding, the City shall have and retain the right to approve counsel to so defend the City; and all significant decisions concerning the manner in which the defense is conducted; and any and all settlements, which approval shall not be unreasonably withheld. The City shall also have and retain the right to not participate in the defense, except that the City agrees to reasonably cooperate with Applicant in the defense of the proceeding. If the City's Attorney's Office participates in the defense, all City Attorney fees and costs shall be paid by Applicant. Further, Applicant agrees to defend, indemnify and hold harmless the City from and for all costs and fees incurred in additional investigation or study of, or for supplementing, revising, or amending, any document if made necessary by said proceeding.

**CERTIFICATION:**

I hereby certify that I am the applicant or designated agent named herein and that I am familiar with the rules and regulations with respect to preparing and filing this petition for discretionary action, and that the statements and answers contained herein and the information attached are in all respects true and accurate to the best of my knowledge and belief.

**SIGNATURE OF APPLICANT OR AGENT:** \_\_\_\_\_



Date: 1/8/18

Applicant will receive an email confirming receipt of request form and packet and assign next available meeting date and time. This will be your meeting date unless you contact us to request a different available meeting date and time. If applicants miss a scheduled meeting, they will be required to reschedule for the next open date available. City of Benicia Community Development Department: (707) 746-4280 Cannabis@ci.benicia.ca.us

**FOR INTAKE, STAFF USE ONLY**

<b>File #</b> _____	<b>Fee Paid</b> _____	<b>Receipt #</b> _____
<b>Date Received:</b> _____	<b>Received By</b> _____	
<b>Zoning</b> _____		
<b>Reviewers Needed:</b>		
<input type="checkbox"/> Fire	<input type="checkbox"/> Building	<input type="checkbox"/> Planning
<input type="checkbox"/> Public Works	<input type="checkbox"/> Engineering	<input type="checkbox"/> Police
<input type="checkbox"/> Parks and Community Services	<input type="checkbox"/> Other _____	





urbn leaf

**City of Benicia Commercial Cannabis  
Business Application Package - Retail Sales**

*Summary Project Plan*

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**A) A description of the operating hours of the facility.**

***Hours of Operation***

The proposed dispensary will remain open to the public a minimum of Seventy Seven (77) hours per week. The dispensary will remain open seven days per week.

Applicant has thoughtfully selected hours of operation that will accommodate patients and customers at varying times of day, depicted in the table below (below), allowing for balanced traffic of patients and customers throughout the day. As shown, the dispensary will open at 10:00 AM. Applicant has decided to maintain the same closing time of 9:00 PM each day as a courtesy to our patients and customers.

***Reevaluation of Hours***

Within three months of becoming operational and opening the dispensary doors to the public, Applicant will reevaluate the hours of operation proposed below. During this evaluation period, Applicant will examine customer and patient visiting patterns, looking for times during the day where the dispensary had more or less customer traffic. Based on this assessment, Applicant will determine if hours of operation should be adjusted to accommodate greater patient traffic in the morning hours. The Applicant will review and respond to all feedback and comments submitted to the Management Team from customers, patients, neighboring businesses, and the County surrounding our hours of operation and will address concerns and questions within two business days.

**B) A description of the hours/days of the week the facility is open to the public.**

The hours of operation for the dispensary will be clearly posted on the dispensary doors, as well as our website. Employees will arrive one (1) hour prior to opening and will depart between thirty (30) minutes and one (1) hour after closing time, to perform opening and closing duties. Applicant is proposing the following hours and days of operation:

***Table 1: Proposed Operating Hours***

<b><i>Day of Week</i></b>	<b><i>Opening Time</i></b>	<b><i>Closing Time</i></b>
Sunday	10:00 AM	9:00 PM
Monday	10:00 AM	9:00 PM

Tuesday	10:00 AM	9:00 PM
Wednesday	10:00 AM	9:00 PM
Thursday	10:00 AM	9:00 PM
Friday	10:00 AM	9:00 PM
Saturday	10:00 AM	9:00 PM

**C) Estimated number of employees (at start-up and at full build-out)**

***Management Team Roles***

The Applicant's Management Team represents extensive experience owning and operating cannabis and non-cannabis businesses in the State of California, as described within the *Business Plan*. The three individuals comprising the team will participate in the day-to-day operations of the dispensary and will hold the following positions:

- TBD, *Dispensary General Manager*
- TBD, *Inventory Control Manager*
- Chris Hester, *Security Director*
- Sidney Dunmore, *Finance and Site Director*
- Will Senn, *Director of Operations*

Urbn Leaf plans to hire a highly qualified Dispensary General Manager who will be responsible for training and overseeing dispensary personnel. A to be determined person will serve as the Inventory Control Manager, responsible for ensuring that physical and electronic inventory counts are always aligned and for conducting inventory audits. Will Senn will oversee the inventory process and will be responsible for training employees and the future Assistant Manager on inventory control procedures and practices, including product auditing, inventory quality assurance, and inventory reconciliation. Chris Hester, a Marine Corps Veteran who was honorably discharged after five years of service (2000 - 2005), will serve as the Security Director. In this role Chris will oversee all security personnel, the implementation of security equipment such as alarms and surveillance cameras, and for designing and implementing all security procedures. He will also review all candidate background check information, including driving record information for delivery driver candidates. Sidney Dunmore will serve as

Finance and Site Director, handling all real estate work for the dispensary and for overseeing the dispensary's financials. Sidney will be principally responsible for managing the company's startup capital and overall budget. Finally Will Senn will serve as the Director of Operations, responsible for documenting all SOPs, and overseeing most of the Company's operating procedures including, but not limited to: recall and inventory management; waste and destruction; construction and build-out; premise maintenance; transport and delivery; ensuring proper testing, packaging, and labeling; compliant use of the track and trace system; and record keeping.

**Two-Phase Hiring Process and Open Positions**

In addition to the five positions outlined above, Applicant will hire full time and part-time employees for several other positions including:

- Assistant Dispensary Manager
- Retail Associates
- Receptionists
- Security Guards
- Delivery Drivers

Applicant has developed a two-phase approach to hiring and staffing for each of the aforementioned positions. Phase I represents the time period from day one through day ninety, while Phase II represents the time period on day ninety-one forward, illustrating the Company's plans to continue hiring as the dispensary is fully built out and operational. The Company will employ more than five (5) full-time people, not counting the owner or security personnel, as described within *Table 3 Employee Coverage* .

Each hiring phase is aligned with the Applicant's aforementioned proposed hours of operation. The dispensary will be open for a total of 77 hours per week, as depicted below in Table 2:

**Table 2: Total Operating Hours**

<b>Day of Week</b>	<b>Staff Arrival Time</b>	<b>Opening Time</b>	<b>Staff Exit Time</b>	<b>Closing Time</b>	<b>Total Hours by Day</b>
Sunday	9:00 AM	10:00 AM	10:00 PM	9:00 PM	11
Monday	9:00 AM	10:00 AM	10:00 PM	9:00 PM	11
Tuesday	9:00 AM	10:00 AM	10:00 PM	9:00 PM	11
Wednesday	9:00 AM	10:00 AM	10:00 PM	9:00 PM	11
Thursday	9:00 AM	10:00 AM	10:00 PM	9:00 PM	11

Friday	9:00 AM	10:00 AM	9:00 PM	9:00 PM	11
Saturday	9:00 AM	10:00 AM	9:00 PM	9:00 PM	11
<b>TOTAL HOURS INCLUDING OPENING/CLOSING DUTIES</b>					91
<b>TOTAL HOURS OPEN TO PUBLIC</b>					77

The following headcount will be needed to support the 77 total operating hours for the dispensary, as well as required lunch breaks, without having any members of the team working overtime (either more than 8 hours per day or more than 40 hours in a week). Table 3 depicts the number of people required, by role, to adequately cover the dispensary operating hours during Phase I of operations:

**Table 3: Employee Coverage**

Role	Number of Coverage Hours Needed Per Week	Headcount Needed to Satisfy Coverage Hours
General Manager	45	1
Assistant Manager	45	1
Retail Associates*	144 (2x shift)	3 *
Receptionist**	77	2
Delivery Drivers	77	2
Security Guard	77	2

\*The Assistant Manager and General Manager will also operate as Retail Associates when needed, allowing the Applicant to begin operations with three (3) Retail Associates on staff during Phase I.

\*\*Receptionists will arrive when the dispensary opens and will depart when the dispensary closes, and will not participate in opening or closing duties.

**Table 4: Employee Hours**

Role	Hourly/Full-Time and Max Hours Per Week	Shift Description
General	Full Time	Sunday - Saturday (days of week will shift week

<i>Manager</i>		<i>over week). General Manager will typically work between 40 and 50 hours per week. Either the General Manager or Assistant Manager will be on site for opening and closing, seven days per week.</i>
<i>Assistant Manager</i>	<i>Full Time</i>	<i>Sunday - Saturday (days of week will shift week over week). Assistant Manager will typically work between 40 and 50 hours per week. Either the General Manager or Assistant Manager will be on site for opening and closing, seven days per week.</i>
<i>Retail Associates</i>	<i>Hourly (Max 40)</i>	<i>A minimum of two (2) Retail Associates will be on shift during hours of operation. Retail Associates will not work more than forty (40) hours in a week or more than eight (8) hours in a day.</i>
<i>Receptionist</i>	<i>Hourly (Max 40)</i>	<i>One Receptionist will be necessary during the dispensary's operating hours. Receptionists will not work more than forty (40) hours in a week or more than eight (8) hours in a day.</i>
<i>Delivery Drivers</i>	<i>Hourly (Max 40)</i>	<i>Two delivery drivers will be hired initially during Phase I to cover the 67 hours per week where the company will offer delivery services.</i>
<i>Security Guard</i>	<i>Hourly (Max 40)</i>	<i>Two Security Guards will be needed to adequately cover</i>

Applicant also aligned Benicias regulatory requirements, such as having one security guard on site at all times when the cannabis dispensary is open, and the Applicant's projected patient and customer traffic forecasts, ensuring that the dispensary will be adequately staffed at all times. To determine the appropriate headcount, Applicant evaluated comparable medical and adult-use markets in the State of California, measured based on size of the anticipated market relative to the area's population.

**Table 5: Staffing Plan Phase I**

<b>Staffing Plan Phase I</b>		
<b>Job Title</b>	<b>Salary/Wage Range</b>	<b>Number of Roles</b>

Assistant Manager	\$50,000 - \$60,000/year	1
Retail Associate	\$16.00 - \$20.00/hour	3
Security Guard	\$20.00 - \$25.00/hour	2
Receptionist	\$13.00 - \$14.00/hour	2
Delivery Driver	\$15.00 - \$20.00/hour	2
<b>Total Headcount During Phase I (Including 6 Person Management Team)</b>		16

**Table 6: Staffing Plan Phase II**

<b>Staffing Plan Phase II</b>			
<b>Job Title</b>	<b>Salary/Wage Range</b>	<b>Established Roles</b>	<b>Additional Roles</b>
Assistant Manager	\$50,000 - \$60,000/year	1	
Retail Associate	\$16.00 - \$20.00/hour	3	2
Security Guard	\$20.00 - \$25.00/hour	2	2
Receptionist	\$13.00 - \$14.00/hour	2	1
Delivery Driver	\$15.00 - \$20.00/hour	2	2
<b>Total Headcount During Phase II Including Phase I Headcount and Five Person Management Team</b>		23	

**Wages and Salaries**

Applicant has conducted extensive market research to determine the average wage or salary for each of the open positions. Applicant considered the region's economic data, California employment and minimum wage requirements, scope of the position, and our deep interest in hiring and incentivizing candidates to remain with the company and provide exceptional patient and customer service. Hourly positions, including Retail Associates and Receptionists range from \$12.00/hour to \$16.00/hour based on the candidate's experience. Hourly wages will not fall below \$12.00/hour, \$1.00 more than California's required minimum wage. Salaried employees, including the Assistant Manager and Security Guard, as well as all members of the Management

Team, will range from \$40,000.00/year - \$85,000.00/year based on each candidate's experience. Salaries will not fall below \$22,880.00/year, the minimum yearly wage articulated within California law.

### ***Benefits Package***

Employees will also participate in a benefits program and all employees working more than thirty (30) hours per week will receive healthcare coverage. Applicant has selected Anthem BlueCross for health insurance coverage through their selected broker, One Touch Digital. Employees must first complete sixty (60) days of work with One Plant before becoming eligible for health insurance.

Further, Applicant will offer employees who work more than thirty (30) hours in a week Anthem BlueCross Dental Blue dental insurance, life insurance, and Anthem BlueCross Blue View vision insurance. Employees must first complete sixty (60) days of work with One Plant before becoming eligible for dental, vision or life insurance.

Employees will receive 10 days of paid time off (PTO) and will also be granted unpaid leave for major holidays, as articulated within Applicant's employee handbook located. These holidays are: New Year's Day; Independence Day, Thanksgiving Day and Christmas Day

### ***Conditions of Employment***

All persons with ownership interest, as well as all employees, officers, and other persons acting for or employed by our Company will be at least 21 (twenty-one) years of age. Applicant will not employ any individuals with previous convictions, or candidates who have entered into a plea of nolo contendere/no contest to any of the following:

- i. A felony offense listed in California Health and Safety Code Section 11590.
- ii. A felony offense listed in California Penal Code Section 667.59(c )
- iii. A felony offense listed in California Penal Code Sections 1197.2(c ) or Section 1192.8
- iv. A felony or misdemeanor offense that substantially relate to the qualifications, functions, or duties of the business or profession.
- v. A felony conviction involving fraud, deceit, or embezzlement.
- vi. A felony or misdemeanor offense involving the sale or giving to a minor of controlled substances, cannabis, alcohol, or tobacco.



Applicant will ensure that there is always a minimum of one Security Guard on site at all times that the cannabis dispensary is open. Chris Hester, Applicant's Security Director will be principally responsible for the security of the dispensary, including the staffing of security guards. Each security guard will be registered with the Bureau of Security and Investigative Services and will possess a valid and current security guard registration card on their person while on-duty.

Applicant will issue all employees a 2" x 2" photo identification badge and personnel will be required to display this laminated identification badge at all times. The badge will show a clear color photo of the employee and will also include the employee's full name, our company's 'Doing Business As' (DBA) name, and our dispensary license number.

### ***Summary***

Applicant is confident in this proposed Staffing and Hiring Plan, as well as our proposed hours of operation. We are committed to providing the community of Benicia with a world-class dispensary experience and understand that to accomplish this, we must hire qualified, professional staff, while ensuring adequate staffing during all hours of operation. We will work with community partners and organizations to publicize open positions, aiming to hire as many candidates from the City of Benicia and County of Solano as possible. All candidates will participate in an extensive review process and will meet or exceed criteria established by Benicia regulations, as well as the State of California.

250 East L Street • Benicia, CA 94510 • (707) 746-4280 • Fax (707) 747-1637



## Police Department

### CANNABIS PUBLIC SAFETY LICENSE APPLICATION

Administered by the Police Department, applicants seeking Cannabis Use Permits must obtain a Cannabis Public Safety License. Applicants must submit a comprehensive security plan, site plan, and floor plan(s) demonstrating the proposed safety and security strategies of the licensed premises. All applicants must complete the application that follows. The responses provided on this application will assist the review panel in evaluating responses as they relate to security standards that the applicant intends to employ.

#### ACKNOWLEDGEMENTS

The undersigned applicant acknowledges that there are considerable risks in operating a cannabis-related business. Those risks include but are not limited to the risks of burglary, robbery, internal and external theft, diversion of cannabis by employees and customers, the risk of minors accessing cannabis products, and associated risks to employees, vendors, and the general public. The applicant hereby acknowledges that it is committed to ensuring a safe environment that mitigates as much risk as is reasonably possible. Risk mitigation strategies must include, at minimum, implementing security requirements mandated by state regulations and those conditions described in this Cannabis Public Safety License Application.

The applicant acknowledges that the Police and Fire Departments will retain the authority to audit, inspect, assess and test the security and safety strategies of the applicant's premises. The applicant acknowledges that as incidents arise, crime trends affecting the cannabis industry evolve, or enhanced security practices develop throughout the emerging cannabis industry, the Police and Fire Departments must reserve the right to impose additional conditions to further the public safety interests of the City of Benicia, as well as those of licensed operators, their employees, vendors and customers who may visit the licensed premises.

Entity/Applicant Name: URBN LEAF

Proposed Facility Address: 1401 E. 5th Street

Authorized Agent (print): Chris Hester Title: Planning/Security Director

Signature:  Date: 9/8/18

**BACKGROUND INVESTIGATIONS**

All applicants, interested parties, and employees of the licensee are required to clear a background check to qualify for a Cannabis Use Permit. This includes a Live Scan Service and may also include additional investigation by the City if deemed necessary. Cannabis Use Permits will not be issued where applicants, interested parties, or employees have felony convictions, as specified in subdivision (c) of Section 667.5 of the Penal Code, and subdivision (c) of Section 1192.7 of the Penal Code, or where convictions exist that substantially relate to the qualifications, functions, or duties of the business or profession, including a felony conviction involving fraud, deceit, or embezzlement or a criminal conviction for the sale or provision of illegal controlled substances to a minor.

Entity/Applicant Name: URBN LEAF

Proposed Facility Address: 1401 E 5th Street

Authorized Agent (print): Chris Hester Title: Planning/Security Director

Signature:  Date: 7/8/18

**SECURITY STANDARDS**

The following security standards must be adopted and implemented by cannabis-related businesses operating within the City of Benicia. Applicants must initial each item under "Initials" to show their acknowledgment. Where the applicant perceives a conflict or seeks an exemption or conditional accommodation, the applicant should mark ("X") under the heading labeled "Conflict". Where the "Conflict" column is marked, the applicant must include as an attachment to this application a written response identifying each perceived conflict. In addressing the conflict, the applicant must refer to the conflict by referencing its part and section number (e.g. Part A, Item 4).

Entity/Applicant Name: URBN LEAF

Proposed Facility Address: 1401 E. 5th Street

Authorized Agent (print): Chris Hester Title: Planning/ Security Director

Signature:  Date: 7/8/18

Part A	Facility Design	Initials	Conflict
1	The primary pedestrian access point (lobby) must be visible from the public thoroughfare	CRH	
2	No further access beyond the lobby must be possible without passing another locked, solid core door.	CRH	
3	Any trees on the premises must have canopies maintained at a height greater than 6-feet from the ground.	CRH	
4	Any ground level landscaping must be limited and maintained at a height no greater than 24 inches.	CRH	
5	No opportunities for concealment may exist within 10 feet of any doorway accessing the structure.	CRH	
6	Any glass storefronts, metal roll-up doors or windows extending lower than 24 inches from ground level must be protected against vehicular intrusion by effective barriers subject to design review/approval.	CRH	
7	Cannabis, cannabis products or graphics depicting cannabis may not be visible from outside the premises.	CRH	
8	Doors accessing rooms containing cannabis must be equipped with solid core doors. If such rooms include windows, windows must be opaque to prevent visibility of cannabis or have a lower sill no lower than 6 feet from ground level. Any such windows must be equipped with intrusion resistant film and incorporate monitored glass-break detection components within the alarm infrastructure.	CRH	
9	Windows, if present, must not be obscured by advertisements, product racks, or other obstructions.	CRH	
10	Any solid core doors accessing the outside will be equipped with 180 degree viewing devices.	CRH	
11	The premises must maintain a minimum exterior lighting standard of 1.5 foot candles across all perimeters, access points and parking spaces associated with the licensed premises. Lighting must be white LED lighting with a heat index between 2700K-4200K, a color rendering index of at least 70 and a light loss factor of at least .95.	CRH	
12	Where foyers exist or awnings are installed on the structure, fixtures must be installed as necessary to provide for a minimum lighting standard of 1.5 foot candles beneath the awning or within the foyer.	CRH	
13	Under Section 17.108 of the Benicia Municipal Code, external building design, architectural features, site plans, landscaping, etc. may be subject to design review.	CRH	

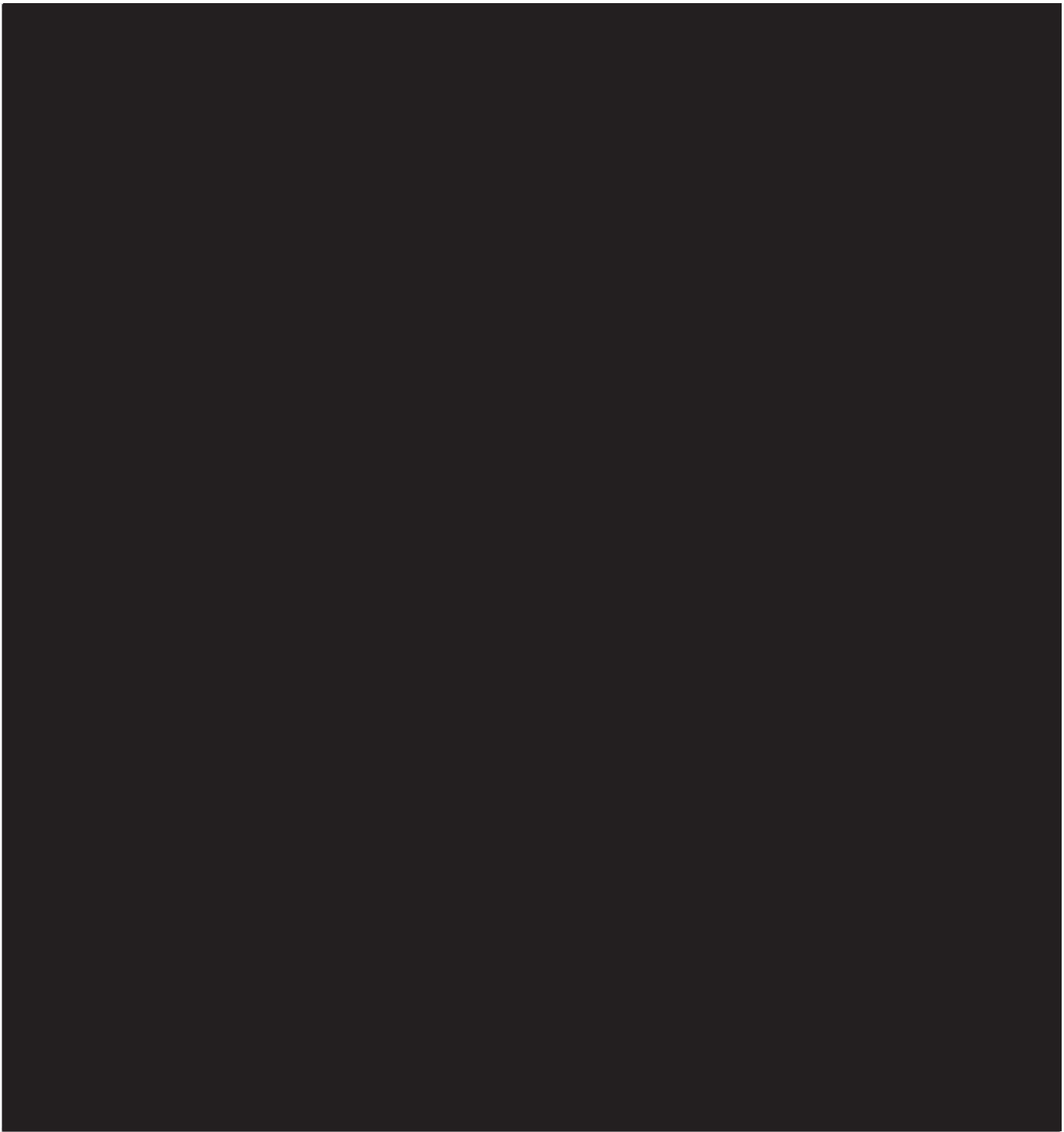
Part B	Facility Access Control	Initials	Conflict
1	An electronic access control system will be installed to control and log access by staff members.	CRH	
2	All rooms containing cannabis or currency will require an electronic access control card/fob to enter.	CRH	
3	The access control system will maintain access data for no less than 90 days; records must be available to regulators upon request.	CRH	
4	The electronic access control system must be supported by a battery backup system ensuring continued operability of the system for no less than 24 hours.	CRH	
5	Key fobs/cards will be user-unique and will provide access only to those areas, and at those times, that the employee has a legitimate need to access.	CRH	
6	All rooms containing cannabis or currency will be equipped with an automatic closing/relocking device and must be kept closed and locked at all times when not in immediate use.	CRH	
7	When employees are terminated, all issued keys/fobs/cards must be accounted for. If a fob/card is missing, it must be immediately deleted from the access control system. Where a physical key is lost or not returned, all relevant cores must be changed on all relevant locks without delay.	CRH	
8	A Knox box containing a master key/fob for the facility must be installed adjacent to the lobby door.	CRH	
9	If fencing or gates are to be installed, they must comply with local building and zoning codes.	CRH	
10	Fencing or gates, if topped with security features, must comply with local building and zoning codes.	CRH	
11	Electronic gate(s), if installed, must be equipped with click-to-enter technology.	CRH	
12	Gate(s), if installed, must be equipped with a Knox-key access system and Knox-box.	CRH	
13	Any physical keys associated with the premises must be stamped "Do Not Duplicate", tracked and logged.	CRH	
14	Packaged cannabis products on the premises must be stored in a limited access vault or appropriately UL-rated safe.	CRH	

Part C	Alarm System	Initials	Conflict
1	Facility alarm installers must be licensed by the Dept. of Consumer Affairs (Alarm Company Operator, CA BPC § 7590 - 7599.80 et al).	CRH	
2	Facility alarm equipment, installers and monitoring centers must be UL (Underwriter's Laboratory) listed. UL certification must be maintained in good standing at all times.	CRH	
3	Any roof hatches or vents accessing the building must be equipped with contact sensors, motion detectors or other practicable electronic monitoring options.	CRH	
4	All exterior doors and interior doors accessing rooms containing cannabis, currency or security infrastructure must be equipped with monitored contact points requiring doors to be closed for the system to arm. Bypassing zones must be prohibited.	CRH	
5	Silent robbery alarm activators must be installed at the lobby/entrance, loading/unloading areas, product/currency storage areas and at any points of sale (where applicable).	CRH	
6	Access control, surveillance and alarm systems must be equipped with battery backups or an auto-start generator capable of supporting system operations for up to 24 hours.	CRH	
7	Where the alarm system malfunctions to any degree, the facility must be staffed on a 24-hour basis by a manager or a licensed security officer until such time as the alarm system is restored to full operability.	CRH	
8	A minimum of one motion detector must be installed in each room of the facility, with additional detectors installed as practicable.	CRH	

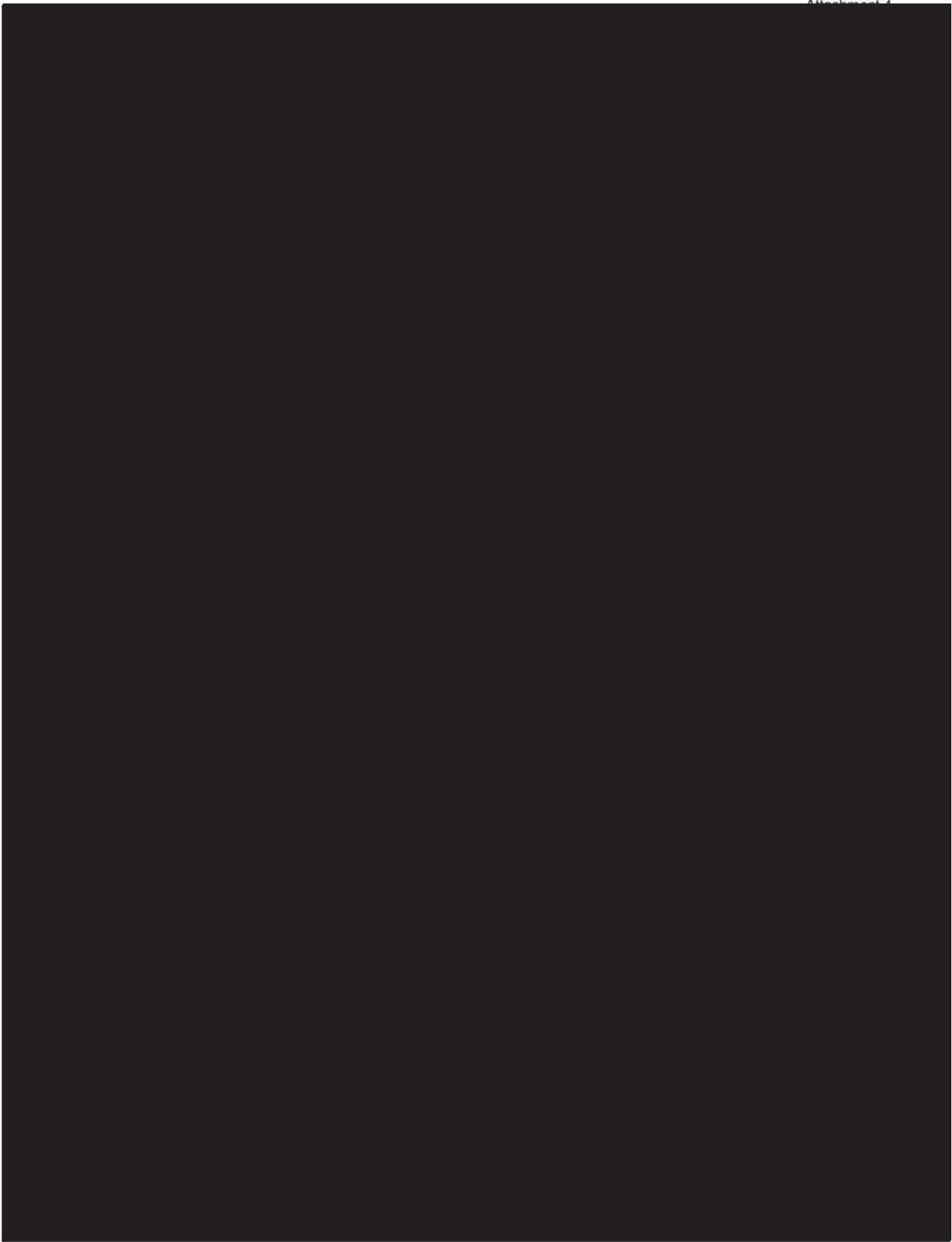
Part D	Surveillance System	Initials	Conflict
1	Cameras resolution rating of no less than 2 megapixels, day/night capable, equipped with auto-iris and auto-focus features.	CRH	
2	Interior cameras must provide no less than 50 pixels per foot in relation to the furthest area/element intended for surveilling. Exterior cameras must provide no less than 80 pixels per foot in relation to the furthest area/element intended for surveilling.	CRH	
3	TCP/IP enabled, accessible over the internet. Remote viewing access must be provided to the Chief of Police or his/her designees.	CRH	
4	DVR must be stored in a limited access area of the facility to which only managerial personnel have access.	CRH	
5	System must record on a consistent basis, both during and after business hours. Footage must be archived for no less than 90 days.	CRH	
6	System must be capable of offloading video in standard formats requiring no proprietary software (e.g. mpeg, wmv, wav).	CRH	
7	System must allow the offloading of video to standard media (e.g. DVD, USB).	CRH	
8	Footage must be accurately date/time stamped. Date and time stamp must not obscure the focus area of the video.	CRH	
9	A log must be maintained accounting for any persons accessing the surveillance system (unique user IDs required).	CRH	
10	Cameras must be placed within 20 feet of each exterior door and must provide both interior and exterior vantage points.	CRH	
11	Limited access areas (entrances, loading areas, rooms containing cannabis, currency or security system infrastructure) must maintain no less than two viewing angles, including each door.	CRH	
12	Cameras must be installed in a manner that protects cameras and cabling from inadvertent or intentional disruption.	CRH	
13	All doors leading to the outside will be accompanied by a video monitor displaying the outside area for pre-egress review.	CRH	
14	Signage must be posted at each entrance to the parcel and structure advising of the presence of video surveillance.	CRH	
15	The applicant must prohibit staff, vendors or customers (dispensaries) from wearing hats, hoods, sunglasses or other attire that may interfere with the ability to identify a person from surveillance video footage.	CRH	
16	Where the surveillance system malfunctions to any degree, the facility must be staffed on a 24-hour basis by a manager or a licensed security officer until such time as the surveillance system is restored to full operability.	CRH	
17	The location of the on-site surveillance server (DVR) must be identified on the provided security floor plan, and must be in a room accessible only to management personnel with access privileges to the surveillance platform's hardware, software and recordings.	CRH	

Part E	Facility Policies and Security Plan Content	Initials	Conflict
1	A manager capable of accessing all rooms must be on the premises during all operating hours.	CRH	
2	A manager capable of accessing surveillance footage must be on the premises during all operating hours.	CRH	
3	Non-managerial employees must not be permitted to take keys, fobs or access cards off premises.	CRH	
4	Non-managerial employees must not be permitted to take employer identification badges off premises.	CRH	
5	The applicant must maintain a strict policy against loitering and trespassing on and about (within 100 feet of) the premises.	CRH	
6	Applicants are advised that an acceptable and comprehensive burglary prevention/response plan will be required prior to licensing.	CRH	
7	Applicants are advised that an acceptable and comprehensive robbery prevention/response plan will be required prior to licensing.	CRH	
8	Applicants are advised that an acceptable and comprehensive plan regarding product diversion and internal theft prevention and response strategies will be required prior to licensing.	CRH	
9	Applicants are advised that an acceptable and comprehensive currency security plan will be required prior to licensing.	CRH	
10	Applicants are advised that an acceptable and comprehensive product loss prevention/shoplifting plan will be required prior to licensing.	CRH	
11	Security plan must be developed in consultation by a third party security professional (e.g. licensed PPO, ACO, certified advanced CPTED practitioner, ASIS certified security planner, etc).	CRH	
13	Security plan must be updated by the applicant as changes to security infrastructure, policies or practices arise. The plan must contain all necessary information to provide for ongoing and efficient maintenance of the security plan (e.g. vendor contacts, equipment descriptions, vendor data, maintenance records, access logs, etc.)	CRH	
14	The plan must be updated with enhanced and relevant strategies within 30 days of any significant incident including but not limited to: Discovery of a significant inventory discrepancy, as defined in CCR, Title 16, Division 42, Chapter 1, Article 3, section 5034); discovery of any cannabis diversion, theft, loss, or any other criminal activity pertaining to the operations of the licensee; discovery of loss or unauthorized alteration of records related to cannabis goods, customers, or the licensee's employees or agents; or any other breach of security.	CRH	
15	The security plan must be reviewed and audited annually by a third party security professional. A log of its review must be maintained within the plan and must include the identity, certifications, review date and comments from the reviewing party.	CRH	
16	Within 30 days of implementing any change to the security plan, the applicant must provide to the Chief of Police or his/her designee an updated version of the security plan with the latest changes highlighted and accompanied by a letter of explanation detailing the reasons for the changes.	CRH	









Part G	Fire Department Requirements	Initials	Conflict
1	A fire and life safety inspection is required prior to the start of any cannabis related operation. After fire clearance is granted, the facility is subject to unannounced inspections throughout the duration of operations.	CRH	
2	A detailed scope of work related to all business activities and products utilized shall be required prior to licensing	CRH	
3	Fire department requirements for Access, Egress, Fire Protection and Storage shall be included in the Site Plan.	CRH	
4	Operational permits are required to be obtained to utilize, store, and handle materials; or to conduct processes that produce conditions that are hazardous to life or property. The fire department is authorized to revoke a permit when it is found that conditions of a permit are violated. Permits shall be readily visible and posted in a conspicuous location.	CRH	
5	All equipment used in operations shall be listed and conform to manufactures recommendation. All non-listed equipment shall require third-party technical assistance for review and approval.	CRH	
6	Fire detection, alarm systems, emergency alarm systems, gas detection systems, fire extinguishing systems and smoke and heat vents shall be maintained in an operable condition at all times. System and system components shall be replaced and repaired when defective. All fire protections systems within a building shall be maintained in accordance to their referenced standard.	CRH	
7	Records within site plans; including Architecture, Mechanical, Electrical, Fire Protection, Construction permits, building operations, and equipment shall be retained on site at all times and readily accessible upon request. Documents such as Fire Department Inspection reports, Fire systems Inspection reports shall also be retained upon issuance.	CRH	
8	The use of all hazardous, flammable, and combustible materials shall be handled, stored, and utilized in accordance to the 2016 California Fire Code.	CRH	

**FOR RETAIL APPLICANTS ONLY**

<b>Part H</b>	<b>Retail Requirements</b>	<b>Initials</b>	<b>Conflict</b>
1	Must incorporate a customer entrance that incorporates a pre-screening method to pre-screen those seeking entry.	CRH	
2	Must incorporate a physical barrier separating the lobby receptionist, electronic access controls and robbery alarm triggers from customers entering the premises. Ballistic protection encouraged (not mandatory).	CRH	
3	Must incorporate a waiting room with staff controlled, electronic access after validating the customer's eligibility to enter at reception.	CRH	
4	Must incorporate separate paths for entry and departure to/from the dispensing room from the waiting room.	CRH	
5	Access from the waiting room to the dispensing area must require electronic, remotely operated "buzz-in" by a staff member.	CRH	
6	If the facility design incorporates an antechamber (not required, but encouraged) between the waiting room and dispensing area, the antechamber must allow for emergency egress and be equipped with crash bars allowing for emergency egress (backtracking).	CRH	
7	If product display cases are provided in the waiting area, display cases shall be intrusion resistant (e.g. polycarbonate or protected by intrusion resistant film), locked, accessible only by a manager, and only opened outside of the facility business hours. NOTE: where the waiting area incorporates windows, applicants shall ensure displays, menus or marketing materials depicting cannabis are not visible to persons outside the premises.	CRH	
8	Any exits from the dispensing room other than the above described inbound and outbound doors will be situated behind counters and in areas posted as restricted access/employee only areas.	CRH	
9	The dispensing room must incorporate a fixed camera focused on each point of sale. Each point of sale must be equipped with a silent robbery alarm activation button.	CRH	
10	Access controls and policies must restrict the number of customers in the dispensing room, not to exceed two customers per employee.	CRH	
11	The dispensing room may maintain only that amount of product and currency that is necessary for business operations as suggested by the average daily sales reflected during the previous 30 days of business operations. Excess amounts of product and currency must remain in the product vault(s) and/or safe(s) in areas limited to management.	CRH	
13	Applicants are advised that an acceptable and comprehensive off-premises currency transportation plan will be required prior to licensing.	CRH	
14	All owners, interested parties and employees of a cannabis retail licensee shall be required to attend Cannabis Retail Sellers training provided by the City. Training shall be completed during the next available course offering by the City following approval of the Cannabis Use Permit.	CRH	

**FOR DELIVERY AND/OR DISTRIBUTION APPLICANTS ONLY**

Part I	Delivery & Distributor Requirements	Initials	Conflict
1	Vehicles must be owned/leased/registered to the licensee (not employee owned) and insured through a commercial auto policy meeting or exceeding California requirements.	CRH	
2	Vehicles must be less than 10 year models old throughout its service life.	CRH	
3	Vehicles must not be marked with graphics or text indicating the vehicle to be associated with cannabis or currency transportation.	CRH	
4	Vehicles must be equipped with a real-time, web-accessible GPS tracking system. Location updates must occur at intervals of no more than one minute. Access to GPS online GPS interface must be provided to the Chief of Police or his/her designee.	CRH	
5	Vehicles must be equipped with locking storage containers proprietary to storage of in-transit cannabis products.	CRH	
6	Vehicles must be equipped with permanently mounted, steel drop-safes for the storage of currency in transit. Drivers must not have access to the drop safe contents.	CRH	
7	Drivers must be equipped with two-way, push-to-talk communications providing for immediate communication between the driver and the licensee (dispatcher, manager or other support staff).	CRH	
8	Vehicles must meet all relevant California regulations (e.g. vehicle alarm systems, secure storage).	CRH	
9	Vehicles must be equipped with on-board video surveillance equipment situated to and of sufficient quality to identify persons unlawfully entering the vehicle or accessing on-board cannabis or currency.	CRH	
10	Applicants are advised that prior to licensing, applicant shall remit an acceptable and comprehensive plan describing how the applicant will: (1) validate the identity of person requesting delivery of cannabis; (2) validate the legitimacy of an address to which a delivery is requested; and (3) validate that the location to which a delivery is requested is not situated upon Federally owned or leased property.	CRH	
11	Applicants are advised that prior to licensing, applicant shall remit an acceptable and comprehensive plan describing how the applicant will seek to mitigate and respond to auto theft, auto burglary, robbery, involvement in a traffic collision, suspicious circumstances, and managing in-field mechanical break downs of vehicles.	CRH	
12	Applicants are advised that prior to licensing, applicant shall remit an acceptable and comprehensive plan describing how the applicant will provide for the secure storage of vehicles used for the transportation of cannabis and/or currency, the secure loading and unloading of product and/or currency, and describing how the applicant will ensure access to vehicles and loading areas is maintained as exclusive to the applicant's employees.	CRH	

250 East L Street • Benicia, CA 94510 • (707) 746-4280 • Fax (707) 747-1637



## Community Development Department Planning Division

### CANNABIS OPERATIONS SCORING AND EVALUATION CRITERIA

A five (5) person review committee selected by the City Manager will review each application. Each committee member will sum his or her score in each category to generate a total score for each applicant. The applicants with the highest scores progress. Successful applicants must achieve 80% or higher score.

Criteria	Description	Points
<p><b>Proposed Location and Design</b></p> <p>See Plans</p>	<ul style="list-style-type: none"> <li>Proposed location identified with address and detailed description, in appropriate zoning and meets all the locational requirements as described in Chapters 17.84.050 (B), 17.84.060 and Chapter 9.60.040 of the Benicia Municipal Code</li> <li>Account for buffer/setback/sensitive use requirements</li> <li>Additional setback/buffer from residential and other sensitive uses, such as schools</li> <li>Extent of pre-permit outreach/engagement with neighborhood and community</li> <li>Provision of parking above and beyond minimum standards</li> <li>Exterior design and materials</li> <li>Signage plan (interior and exterior), including plan for avoiding marketing to youth</li> <li>Added design features, such as windows, primary entrance facing street, pedestrian improvements, no significant blank walls, removal of existing nonconforming features such as pole signs,</li> <li>security screening not visible from exterior</li> </ul>	20
<p><b>Business Plan</b></p> <p>SEC 6</p>	<ul style="list-style-type: none"> <li>Amount of experience operating a licensed cannabis business</li> <li>Amount of experience operating retail storefront or, in the case of microbusiness, experience with applicable microbusiness practices, cultivation, manufacturing, packaging, retail, and delivery</li> <li>Description of day-to-day operations which meet industry best practices for specific type of permit requested from City;</li> <li>Timeline for beginning operation, including outline for any proposed construction/improvements and a deadline for completion</li> <li>Budget for construction, operation, maintenance, compensation of employees, equipment costs, utility costs, and other operation costs. The budget must demonstrate sufficient capitalization to pay startup costs and at least three months of operating costs, as well as a description of the sources and uses of funds</li> </ul>	30

	<ul style="list-style-type: none"> <li>• Proof of sufficient capital to cover first 3 months of operation (documentation of cash or other liquid assets on hand, Letters of Credit or other equivalent assets)</li> <li>• Pro forma for at least three years of operation</li> </ul>	
<b>Neighborhood Compatibility And Plan</b>  SEC 7	<ul style="list-style-type: none"> <li>• How proposed use, including exterior areas/surrounding public areas, will be managed, to avoid nuisance problems or negative impacts on neighbors and surrounding community</li> <li>• Applicant conducted community workshop</li> <li>• Site plan (accurate, dimensioned and to-scale [minimum scale of 1/4"]) required for each proposed location</li> <li>• Proposed plan (such as designated manager) to handle complaints</li> </ul>	20
<b>Community Benefits</b>  Sec 7	<ul style="list-style-type: none"> <li>• Benefits applicant would provide to local community, such as employment for residents of the City, community contributions, or economic incentives to the City</li> <li>• Planned partnership(s) with neighboring businesses</li> <li>• Plan for ongoing community outreach/engagement with neighborhood and community</li> <li>• Addressing issues raised in public meeting, including evidence that concerns raised have been resolved</li> </ul>	30
<b>Enhanced Product Safety</b>	<ul style="list-style-type: none"> <li>• How applicant proposes to enhance consumer safety beyond requirements of State and/or local law SEC 8 &amp; 11</li> </ul>	20
<b>Environmental Benefits</b>  SEC 8	<ul style="list-style-type: none"> <li>• Any proposed "green" business practices (e.g., solar) relating to energy and climate, water conservation, and materials and waste management; technology promoting efficient use of electricity (e.g. MCE deep green), low impact development for storm water</li> </ul>	20
<b>Labor &amp; Employment</b>  SEC 7	<ul style="list-style-type: none"> <li>• Whether applicant will provide training program for Responsible Cannabis Retail resulting in a certificate from an accredited learning institution</li> <li>• To what extent applicant will adhere to state law requirement for labor peace agreement, if applicable, or heightened pay and benefits standards and practices, including recognition of the collective bargaining rights of employees. Specific practices subject to consideration include the following:             <ul style="list-style-type: none"> <li>○ Providing opportunities for continuing education and training of employees/staff (applications should provide proof of the CPSL policy and regulations to employees)</li> <li>○ Providing a "living wage" to facility staff and employees. Wage scale should be provided in writing for all levels of employment at the facility. "Living Wage" shall mean 150% of the minimum wage mandated by California or Federal law, whichever is greater</li> </ul> </li> </ul>	20
<b>Local Enterprise</b>  SEC 6	<ul style="list-style-type: none"> <li>• Extent to which proposed use will be locally managed enterprise whose Owners reside within Benicia and/or the County of Solano</li> <li>• Evidence of historical tax compliance</li> </ul>	20
<b>Qualifications of Owners</b> SEC 6	<ul style="list-style-type: none"> <li>• Information re: any special business or professional qualifications or licenses of Owners adding to number or quality of services that the</li> </ul>	30



	<p>proposed use would provide, especially in areas related to medical cannabis, such as scientific or health care fields</p> <ul style="list-style-type: none"> <li>• Applicant’s history of compliance in a regulated industry, including record of interactions with prior City governments</li> <li>• Knowledge of state and local regulations</li> </ul>	
<p><b>Air Quality Plan</b> SEC 9</p>	<ul style="list-style-type: none"> <li>• Plan for managing effects of indoor (employees’ health and welfare) and outdoor (surrounding businesses) air quality resulting from proposed use (odor control including carbon filters, air scrubbers, and masking agents in ventilation system, etc.)</li> </ul>	20
<p><b>Safety and Security Plan</b> SEC 10</p>	<ul style="list-style-type: none"> <li>• How the proposed use will provide safety and security on the property. Security plan must include interior and exterior physical layout and design plans and operational details as they relate to security</li> <li>• Security measures beyond minimum standards</li> </ul>	20
<b>Total</b>		<b>250</b>



urbn leaf

**Urbn Leaf**  
**City of Benicia Commercial Cannabis**  
**Business Application Package - Retail Sales**

*Business Plan and Qualifications of Team*

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### ***Introduction***

Applicant understands that, in accordance with the city ordinance, the City of Benicia will allow dispensaries within the municipality, and the total number of operations is to be determined based on the number of locations which qualify. Urbn Leaf is hopeful that the aggregate experience of the owners, paired with the thoughtful selection of a secure site, will be a keystone in the decision to issue a dispensary permit.

Urbn Leaf will comply with all local and state regulations and meet all deadlines for state licenser, as mandated by the State of California and the Bureau of Cannabis Control, as well as communicate the pursuit of licenser to the City of Benicia. If permitted by the City of Benicia, Applicant is prepared to be operational within 180 days of issuance. When operational, Applicant will ensure that the facility is secure and obtains applicable, comprehensive general liability combined single occurrence insurance policy issued by an "A" rated insurance carrier in an amount no less than two million dollars and naming the City of Benicia as additional insured, pursuant. Urbn Leaf will comply with all operational regulations as set forth by the City of Benicia, including prohibiting free samples from being distributed.

### ***Mission Statement***

Urbn Leaf's vision is to operate as the premier model for the dispensing of cannabis and cannabis infused products by implementing and endorsing the highest standards of professionalism, integrity, and quality. We will focus intently on consumer and public safety, compliance, and community engagement. Urbn Leaf is committed to collaborating with the City of Benicia to ensure that we act as a responsible corporate citizen in everything we do.

***Experience and Background***

The Applicant team boast a combined 25 years in the commercial cannabis industry. It is with this prior experience that Applicant is confident that the licensed Commercial Cannabis Business in Benicia will not only have the support, practical knowledge, and business strategy to operate, but that operations will be successful, safe, and compliant.

*Sidney Dunmore - Finance and Site Director*

Sidney Dunmore has operated as an active manager of a medical cannabis dispensary in Sacramento, California. During the last five years, Sidney has maintained the capability to comprehend and implement structured, regulatory entities and has been involved in the negotiation and development of state and tribal medical cannabis programs in various states. Prior to his work in cannabis, Sidney operated in the regulated realm of real estate and managed the creation of over 30,000 single family lots, and up to four million square feet of California retail, commercial and restaurant uses in over 70 separate sites. On the national platform, Sidney worked with Phoenix Botanical Research; a group of doctors, health care professionals, and business people dedicated to broadening the medical cannabis footprint in the United States by developing research-based opportunities for discovery and innovation. Sidney will serve as Finance and Site Director, handling all real estate work for the dispensary

and for overseeing the dispensary's financials. Sidney will be principally responsible for managing the company's startup capital and overall budget.

*Chris Hester - Security Director*

Chris Hester joined the regulated cannabis industry in Colorado, after receiving his Bachelor Degree from the University of Colorado, Boulder in 2008. For over 10 years, Chris has been actively involved in the operations of a number of cannabis businesses throughout Colorado and California. As a cultivator, Chris learned the necessity for quality control and inventory management, in addition to bringing to fruition the plant that makes this industry possible. It is with this experience that Chris relocated to California to bring his strategic planning skills, operational startup processes, and product design experience. Chris is an owner of Central Coast Garden Products, a manufacturing company, that produces a non-toxic pesticide developed specifically for cannabis. Chris is also a strategic consultant for tribal cannabis business development, assisting in all aspects of planning for cannabis operations for Native American tribes. Chris, a Marine Corps Veteran who was honorably discharged after five years of service (2000 - 2005), will serve as the Security Director. In this role Chris will oversee all security personnel, the implementation of security equipment such as alarms and surveillance cameras, and for designing and implementing all security procedures. He will also review all candidate background check information, including driving record information for delivery driver candidates.

*Will Senn - Director of Operations*

Will Senn is Founder of urbn leaf. Will is one of the cannabis industries' most prolific entrepreneurs. Over the past 10 years, he successfully built 8 early-stage medical cannabis businesses. His focus project, urbn leaf, is regarded as one of the most successful Cannabis retail brands in California. The flagship urbn leaf unit is on a current run rate expected to exceed \$40MM/yr on its own. Urbn Leaf currently employs over 400 people in San Diego. Urbn Leaf holds a 30% market share in its home market. Mr. Senn has navigated multiple permits through the San Diego City Conditional Use Permit process, and currently has interests in 3 licensed dispensaries in San Diego. Additionally, he is navigating 2 dispensaries through the La Mesa, CA CUP process. There are a total of 9 urbn leaf retail sites in the 18 month pipeline currently slated for California. Mr. Senn has also been instrumental in the creation of several highly successful cannabis trade associations. He is the Founder of the United Medical Marijuana Association, the Legal Cannabis industry trade organization representing the licensed and permitted Cannabis businesses in San Diego. In 2010, he co-founded the Patient Care Association, one of the first medical marijuana industry associations in the country. He was also a founding member of the Alliance for Responsible Medicinal Access, the association instrumental in developing the current San Diego City Medical Marijuana Ordinance. Mr. Senn is also Founder of Citizens for Patients Rights, the political action committee responsible for cutting edge change in Marijuana policy for San Diego County.

Will is an industry leader and an expert in the regulatory and political aspects of cannabis business development. Mr. Senn attended San Diego State University, with an emphasis in business. He has lived in San Diego, CA since 2003. Will will serve as the Director of Operations, responsible for documenting all SOPs, and overseeing most of the Company's operating procedures including, but not limited to: recall and inventory management; waste and destruction; construction and build-out; premise maintenance; transport and delivery; ensuring proper testing, packaging, and labeling; compliant use of the track and trace system; and record keeping.

### ***Dispensary Facility and Premise***

Applicant aims to become a welcome addition to Benicia by acting as a good neighbor to surrounding residents and fellow businesses. To accomplish this, Applicant will adhere to all city ordinances, and will incorporate the use of best practices in facility design to ensure disturbances to others near the premises are minimized. Urbn Leaf will also aim for seamless integration of our dispensary, with regard to the dispensary's interior and exterior design, so that the business closely resembles surrounding

businesses while upholding the style of the neighborhood we hope to be part of once operational. Currently the building proposed is vacant and unused.

Applicant has selected this site due to its availability and proximity to the freeway. In accordance with regulations the proposed dispensary site is not located within a 1,000-foot radius from a school. Our proposed location is fully compliant with applicable zoning ordinances and planning regulations, and the hours of operation will be considerate of neighbors and consistent with other businesses. The site is highly accessible, and features onsite parking. The exterior will include a sign that complies with the ordinance and the city of Benicia, in that it will not be attractive to minors and will be 20 square feet or less in total area, and limited to only one wall of the exterior. The sign will include the name of the business and an image similar to Urbn Leaf's logo (image below). The exterior premise will be maintained in an orderly fashion, ensuring that graffiti, trash, litter, or other nuisances will be addressed and kept to a minimum. This will be achieved by consistent sanitation performed by employees, and a constant security guard presence during business hours.



urbn leaf

Dispensary Exterior - San Diego



Although the building in Benicia is different from the above picture this is an example of signage and the aesthetic appeal Urbn Leaf will bring to current dilapidated structure in Benicia.

**Dispensary Interior**

The dispensary's interior will mirror the design of its award winning dispensary located in San Diego. Applicant has conducted extensive research and has begun selecting and evaluating various professional design elements, incorporating environmentally friendly features and fixtures wherever possible. The dispensary will include an air treatment system that purifies and filters the air, prohibiting pathogen development while mitigating odors. Further, the interior aesthetic will not include aspects that are attractive to minor. A copy of Applicant's CCB permit will be conspicuously displayed and visible to the public, at all times, in compliance with . Physical modification will not be conducted unless prior permission is granted by the



City of Benicia and all applicable fees have been paid. The following images of Urbn Leaf Dispensary should be considered as a reference to our design strategy and plans for the dispensary in Benicia.



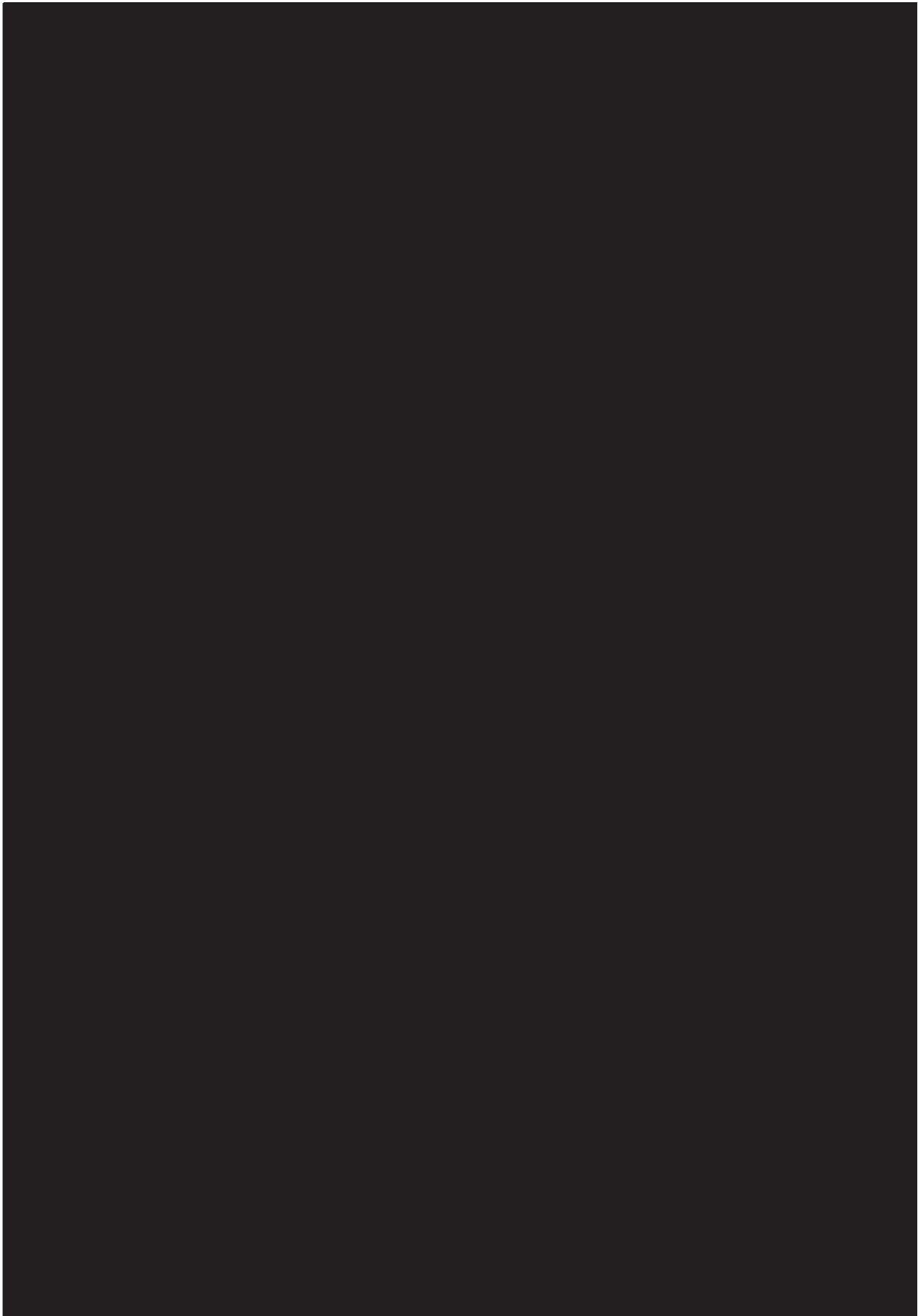


***Financials***

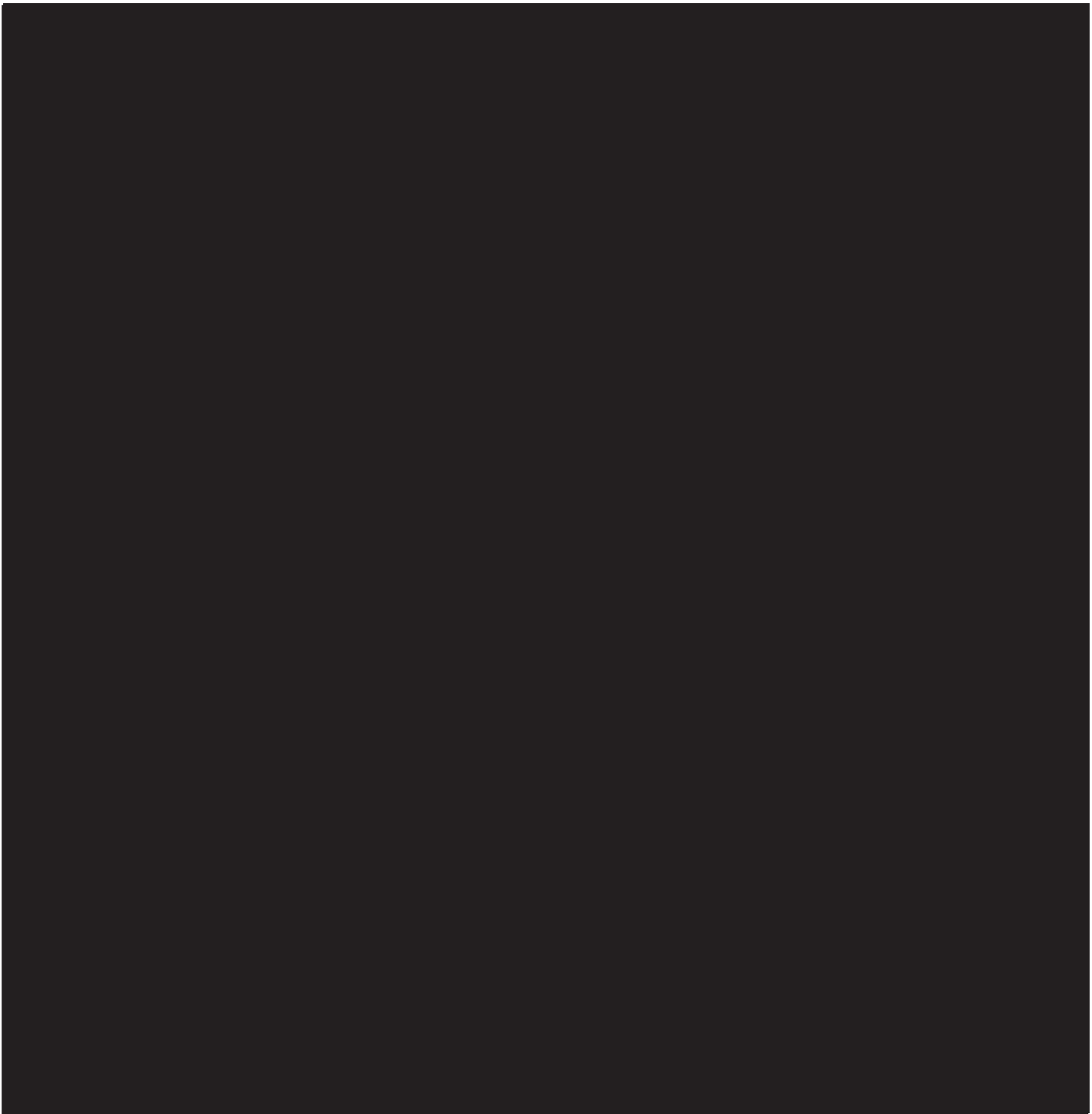
Applicant has prepared detailed financial assumptions, a three-year operating budget as well as a three-year pro forma for the proposed dispensary, as depicted below.

***Financial Assumptions***













Applicant evaluated numerous licensed cannabis distributors in the State of California. Distributors are permitted Commercial Cannabis Businesses that act as a midpoint between licensed cultivators and manufacturers and the licensed retail operations that will receive the product. Distributors are responsible for ensuring that cannabis and cannabis-derived products within their inventory are tested and approved for sale prior to transferring to a licensed dispensary. They are also responsible for accurate and compliant packaging and labeling; and proper handling and storage of product to prevent degradation, contamination, or spoilage.

Each selected distributor was carefully evaluated by the Applicant to verify that each distributor possesses a valid California state license to distribute cannabis and cannabis products. Further, each distributor shares the Applicant's commitment to compliance, safe and secure operations, sanitation, predictable logistics, and carefully selected products. Applicant is confident that by partnering with the following distribution companies, the proposed dispensary will offer an unparalleled selection of leading cannabis products that meet or exceed all regulatory requirements upheld by the City Benicia, as well as the State of California. Each of the distribution companies are described herein, accompanied by a description of the Applicant's relationship with each distributor.

- **Choices Distribution**

- *Licensed Medical and Adult-Use Distributor*
- Choices Distribution understands that their role as a distributor is to, first and foremost, provide the market with superior quality cannabis and cannabis products, but they also recognize the need for community and connection within the California market. Choices Distribution has fostered a vast network of cultivators, manufacturers, retailers, and strategic partners in order to bolster the success of each entity, but more importantly to increase the chances of success of the California market as a whole.
- *Brands Offered by Choices Distribution:*
  - Big Smokey Farms
  - California Finest
  - Certified Skunk
  - Cocoa Meds
  - Dab Face Concentrates
  - Farm Fresh
  - Gold Coast
  - Golden State Banana
  - HiFi Edibles
  - Invisidab
  - Medi X
  - Mr. Natural
  - Paper Planes



- Space Monkey Meds
- Stoney Ranch
- Terp Boys
- The Grape Cookies
- The Lemon Tree
- The Money Team
- Wet Genetics

- **EdiPure**

- *Licensed Medical and Adult-Use Distributor*
- EdiPure is a well-known and established brand that originated in the highly regulated cannabis market in Colorado. EdiPure calls upon that previous experience to refine and solidify their compliant operations in California. This experience also provides EdiPure with a discerning eye for quality and sustainability in their business strategy.
- *Products Offered by EdiPure:*
  - Edible Gummies
    - Available in a variety of fruit flavors and miscellaneous shapes
  - Chocolate Covered Gummies and Savories
    - Available in various fruit flavors, coated cookies, and coated peanut butter bites.
  - Kief
    - Packaged increments of detached trichomes/resin glands.

- **Indus Holding Co.**

- *Licensed Medical and Adult-Use Distributor*
- Indus Holding Co. maintains a strong presence in the licensed and regulated California market by carefully vetting and selecting the partners and brands that become part of their distribution inventory. This dedication to quality and product awareness is clear in their selection of well-established brands that comprise their product offerings.
- *Brands Offered by Indus Holding Co.:*
  - Acme Elixirs
  - Altai Brands
  - Beboe
  - Cypress Cannabis
  - Dixie Elixirs
  - Flavor CA
  - House Weed
  - Mirth Provisions
  - Moon
  - Original Pot Co.
  - Terp X
  - W Vapes

- **Korova**

- *Licensed Medical and Adult-Use Distributor*
- The success of Korova's business strategy and operational practices is evident in their ability to scale to a multi-state presence. Korova has accomplished this through a constant commitment to quality and safety, as seen in their strict accountability and testing regimen of all products, even before regulatory guidelines mandated such rigid practices.
- *Products Offered by Korova:*
  - Flower; including strains such as Cookies, Gelato, Mendo Breath, Pie Face, Super Silver Haze, and THC Bomb
  - Edibles; offerings include cookies, bars, brownies, blondies, and popcorn
  - CBD options, including a vaporization cartridge featuring a 2:1 CBD:THC ratio

- **Old Kai**

- *Licensed Medical Distributor*
- Old Kai offers multiple services necessary for supplementing a successful cannabis business including supply of high quality, vetted cannabis and products; transport and delivery; as well as sales and marketing. Old Kai works exclusively with licensed cultivators and manufacturers to secure their commitment to providing quality cannabis and cannabis products to the state of California.
- *Brands Offered by Old Kai:*
  - Biscotti Brands
  - Dr. Robb Farms
  - Garden Society
  - Henry's Original
  - Manzanita & Madrone
  - Rove
  - Sprig

- **River Collective (RVR)**

- *Licensed Medical and Adult-Use Distributor*
- RVR boasts a strict adherence to compliance and regulated business within their operations and company culture. They understand the need for guidelines and regulatory measures in order to progress within the market. This commitment to success through quality and compliance was fostered by the team at RVR who have come from the cannabis and wine and spirit industries.
- *Products and Brands Offered by RVR:*
  - Flower/Cultivation Brands
    - Emerald Family Farms
    - Farmer's Reserve

- FloraCal Farms
  - Honeydew Farms
  - Occidental Hills
  - THC Design
  - Utopia
  - Concentrates/Extraction Brands
    - Elicit Labs
    - Gold Drop Co.
    - Greenrock Botanicals
    - IndigoPro
    - King Extracts
    - Kurvana
    - Quality Concentrates
    - Utopia
  - Edibles/Infusion Brands
    - Chong's Choice
    - Défoncé Chocolatier
    - Plus Products
    - Soul Sugar Kitchen
    - Stokes Confections
    - Utopia
    - Xternal
  - Fiori (CBD products)
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**City of Benicia Commercial Cannabis Business  
Application Package - Retail Sales**

*Neighborhood, Community, and Employee Relations Plan*

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## ***Employee Training Overview***

Applicant understands that the proper training of employees and members of management is the cornerstone to providing safe, conscientious service to patients, customers and the greater community of Benicia. In order to ensure that all employees understand the importance of protecting patient privacy and adhering to HIPAA and other confidentiality regulations, Applicant will work with third-party trainers, such as ServSafe certifiers and METRC™ trainers, as well as local law enforcement to develop and collect feedback following each training program. The Director of Operations, will be responsible for the development, implementation, and oversight of training material and patient interaction, and will summarize training materials for employees. Justin will also be responsible for designing assessment materials which all employees must pass, initially upon hire, and quarterly thereafter. Training materials will be provided in written and electronic formats, which all employees will have access to.

Before becoming authorized to dispense cannabis at One Plants dispensary, employees will participate in a comprehensive training program with particular emphasis on safety programs and the importance of protecting patient confidentiality. Safety training, described in greater detail herein, will cover the ways in which employees are expected to handle emergencies and safety related issues at the dispensary. These comprehensive and ongoing trainings will ensure Applicant employees are equipped with the skills required to protect patient confidentiality while providing the highest level of service to our patients.

### ***Safety and Security Training***

Applicant acknowledges that all employees hired by the dispensary must participate in safety training. Applicant will facilitate the following Safety and Emergency Response Training Program, ensuring that all members of the team understand how to properly handle emergency situations at the dispensary:

**Table 1: Safety and Security Training**

<b>Training Name</b>	<b>Annual Training Length</b>	<b>Summary of Training</b>
Emergency Action Response Planning	3 Hours	Applicant feels strongly that all team members should understand the security measures in place at the dispensary and each employee's response in the event of a security emergency including, but not limited to, armed robbery. All employees will be trained to identify both security and medical

		emergencies and to respond accordingly. Response includes notifying proper members of management as well as enforcement and medical emergency first responders.
Employee Accident Reporting and Investigation Policies	2 Hours	Training and instruction for employees regarding the appropriate method to report an incident to a supervisor and how to properly document accidents, emergency situations, and adverse events.
Fire Prevention and Fire Safety	3 Hours	Addresses the roles of employees as it pertains to understanding of the various threats and hazards that are most likely to cause a fire within the facility, as advised by OSHA's Fire Safety in the Workplace curriculum. Employees will have clear definition of their respective roles in preventing fires, and maintaining safety protocols in the event of a fire.
Hazard Communication Training	2 Hours	Training will be aligned with OSHA's Hazard Communication Program to train and educate employees on the safe handling, proper storage, and emergency procedures for hazardous substances and hazardous waste.
Maintaining and Understanding Material Safety Data Sheets (MSDS)	1 Hour	Training and instruction includes accurate documentation of potentially hazardous substances, storage and access to MSDS documents for each type of hazardous substance, and MSDS measures for handling hazardous waste.
Storage and Handling Training	3 Hours	Sanitation and hygiene training will instruct employees on the proper handling of consumable goods, and includes food-grade storage, cleaning and sterilization practices, and biological contamination prevention. Training will include proper storage measures to prevent deterioration or degradation.
Personal Protective Equipment (PPE) Usage Training	1 Hour	PPE will serve as a barrier from hazards, but also protects sterile environments from contamination from bodily contact. As necessary, employees will be instructed on the proper use of PPE when handling cannabis waste or hazardous substances.

## Confidentiality Training

Confidentiality training will teach each employee how to collect, handle and store patient records so that records are not accessible by other members of the team, or unauthorized users, unless needed. The Director of Operations will explain the proper way to ask patients sensitive questions about their health and condition, how to take notes during patient conversations and when notes are prohibited, how to update patient records during the patient intake process so records are protected within our secure software system, and how to properly dispose of records so that sensitive material is shredded and inaccessible. We understand that many of our employees may join our company from other professions where confidentiality may not have been a concern or job requirement. As such, we will require each member of our team to participate in extensive training so that we may hold our entire team accountable while ensuring the safekeeping of patient files.

**Table 2: Patient Confidentiality Training**

Training Name	Training Length and Frequency	Summary of Training
Protecting Patient Confidentiality	4 Hours Twice Annually	Confidentiality training will focus on the critical nature of maintaining patient confidentiality and privacy whenever interacting with patients and discussing their medical information. This will also cover the importance of adhering to all confidentiality protocols for information security when collecting confidential patient information.
Patient Verification	3 Hours Twice Annually	Access to a cannabis facility is restricted to the licensees, employees of the licensee, and registered qualifying patients and registered primary caregivers with valid registry cards. This training will ensure that employees understand how to properly verify a patient's registry card before permitting the patient to enter the dispensary, as well as ensuring the employee maintains confidentiality of the patient's information during the check-in process.
Qualifying Medical Conditions	4 Hours Twice Annually, or	This training provides a comprehensive overview of the qualifying medical conditions, symptoms experienced by patients diagnosed with each condition, and how to

	any time new conditions are added	make medical recommendations, accordingly. Protecting patient privacy while discussing medical conditions will also be covered.
Patient Counseling	4 Hours Twice Annually	Patients of Applicant will have the opportunity to meet one on one with an Applicant employee within a confidential patient consultation room within the dispensary to discuss their treatment options. During this training, employees will utilize content from the qualifying condition training to align therapeutic properties of cannabis and products to symptoms that may be treated with a particular strain or product. Employees will be trained to assist patients with their selection, in lieu of providing medical advice and to provide and explain educational materials, should a patient have health inquiries. This training will ensure that employees gain necessary skills for providing optimal patient care.
Regulatory Compliance	3 Hours Twice Annually	This training will cover the state and local regulations pertaining to purchasing limits, patient confidentiality, and record keeping.
Patient Service	4 Hours Once Each Quarter	Applicant employees will be trained to provide comprehensive, effective service to patients. This training will also cover: legality and regulations governing cannabis; how to maintain a safe, secure dispensary environment; how to engage in meaningful patient interactions; and patient education.
Specialized Software	4 Hours Twice Annually or After Updates	Specialized Software training will train employees how to use the various software programs, including METRC™ and a Point of Sale (POS) system, in alignment with HIPAA regulations, allowing for seamless use of reporting documents.

### **Contact Sheets and Emergency Communications**

The Director of Operations will maintain current contact sheets to facilitate efficient, rapid communications in the event of an emergency. Each contact sheet will be posted next to all phones within the dispensary, and will be disseminated by email, as well as in hard copy, to employees during the employee onboarding process. While the regulations require contact information for emergency responders, poison control and the Management Team, Applicant has also included contact information for area hospitals and urgent care clinics.



Sample Emergency Contact Sheet

EMERGENCY CONTACT LIST	<b>EMERGENCY</b>	<b>NON-EMERGENCY POLICE DEPT</b>
	<b>In an emergency, dial 911.</b>	Local Phone Number
	<b>POISON CONTROL</b>	<b>NON-EMERGENCY FIRE DEPT</b>
	Local Phone Number	Local Phone Number
	<b>SECURITY DIRECTOR</b>	<b>GENERAL MANAGER</b>
	Name Local Phone Number	Name Local Phone Number
	<b>ASSISTANT MANAGER</b>	<b>LOCAL SERVICES</b>
	Name Local Phone Number	Security Company: Phone Number Electric Company: Phone Number Water Company: Phone Number
	<b>OTHER EMERGENCY CONTACTS</b>	<b>OTHER EMERGENCY CONTACTS</b>
	Name Phone Alternate Phone	Name Phone Alternate Phone

**Training Records**

Records will be maintained for all One Plant employees so the Company has a clear understanding of which employees have completed trainings, and whether or not additional trainings will be necessary for an employee based on insufficient scores on required assessments. A Certificate of Completion will be awarded to employees upon training completion and will be kept on file in accordance with our record keeping plan and HR policies. Our proposed dispensary is committed to maintaining a transparent and fully accountable set of employee training records for internal and external audits, and review by the City of Benicia (City) or the Bureau of Cannabis Control (Bureau), at

all times. All records of employee training and certifications will be maintained by the Human Resources (HR) department.

All physical documents concerning employee training and certifications will be stored in the Document Storage Area of the office, located in the restricted access area of the proposed dispensary. All physical records will be retained for a minimum of two years and available for immediate retrieval upon request by the City, Bureau, or any other authorized authority.

### ***Ensuring Compliance***

During the operations of our dispensary, it may become necessary for employees to disclose confidential patient information to a caregiver or other authorized individual in accordance with regulations. Release of patient information will be limited to specific members of our team. When making disclosures of patient health information, designated employees will be trained to take steps to minimize the disclosure of non-pertinent health information unless the disclosure is being made to the government under the requirements of HIPAA. Upon completion of the trainings outlined above, One Plant employees will understand that the following would be inappropriate, unethical, and/or illegal in regards to protecting patient confidentiality:

- Discussing or revealing patient information to anyone (e.g., friends, family, other patients, etc.);
- Removing any patient information from the dispensary for any purpose without explicit authorization;
- Discussing or revealing patient information to another employee unless the information must be shared pursuant to Company policy or regulations;
- Obtaining access to patient information not directly necessary for performing job duties;
- Copying patient files or other patient information onto a personal computer or transmitting patient files via e-mail or other electronic medium without encryption;
- Sending patient information via e-mail or fax without explicit authorization;
- Copying patient files or other patient information onto a USB, CD, or other electronic medium, without explicit authorization for a specific purpose, except when conducting authorized computer backup on a scheduled basis; and
- Placing patient information on the internet or into any other publicly-available forum without consent.

Any employee who is found to have violated our policies or state and federal regulations for protecting patient confidentiality will be subject to disciplinary action, up to, and including, termination.

Applicant will hold all staff, as well as patients and service providers, to high a standard of conduct. For our employees, this means required education on community relations, business ethics and compliance, and respectful behavior. These trainings will be conducted alongside community leaders, industry professionals, and health, fire, and law enforcement personnel. All employees will be expected to adhere to our Company's

code of conduct at all times. This will ensure that all employees maintain a professional and courteous demeanor both inside the facility and in the surrounding areas, as well as maintain up-to-date knowledge of laws and responsible cannabis use.

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### ***Feedback Programs***

If any member of the Benicia community has a concern or complaint with regard to facility operations, they will be able to submit the concern through either our online submission forum, located on our website, or using a comment drop box located within the dispensary. These two feedback mechanisms will allow people to share their comments, complaints or concerns directly with our Management Team. Applicant will check the online forum daily and will respond to community members directly via the online forum or by phone, when applicable.

The Management Team will voluntarily produce a quarterly Community Assessment Report that outlines the most important concerns raised by the community and their respective responses. Results will be reviewed on a quarterly basis by the entire management team so that the company can address and respond effectively to concerns. Applicant is prepared to make adjustments to day-to-day operations should there be any identified negative effects on the community. Trainings and SOPs will be reevaluated when concerns are presented and, should significant changes be required of our procedures, mandatory training will be held for employees to ensure understanding across all teams.

Beyond establishing these two forums for obtaining feedback, the Applicant will also proactively seek feedback from all neighboring businesses within 300 feet of the dispensary a minimum of two (2) times per year. Applicant acknowledges that each neighboring business may wish to communicate concerns or ideas in a different manner. To accommodate this, the Applicant's Management Team will offer to meet at the neighboring businesses to speak directly with the owners of these companies. We will also offer meetings at the dispensary, should any neighboring business be interested in learning more about our business.

### ***Ongoing Public Information Program***

Applicant will deploy an ongoing Public Information Meeting series, designed to inform City residents of cannabis issues while informing residents about cannabis products and the proper, safe and legal ways cannabis products should be used. Applicant will host four (4) Public Information Meetings per year, one per quarter. Applicant will obtain City approval of each meeting prior to holding the meeting. Applicant's proposed format for these meetings is as follows:

1. Applicant will identify a venue off premises to host members of the community interested in learning more about our business, as well as general cannabis information.
2. Applicant will publicize the meetings on our website, through social media, by posting the meeting schedule at the dispensary and by communicating the meeting time and date with neighbors, City council and other community partners.
3. Each meeting will include:
  - a. Scheduled Learning Topic
    - i. These may include, but are not limited to: exploring various delivery systems; explaining various product categories and the cannabis brands and products within each category; discussions surrounding the proper dosing of cannabis; and alignment between cannabis products and medical conditions.
  - b. Question and Answer Session
    - i. Attendees will always have the opportunity to ask questions at the conclusion of the meeting. The Applicant's Management Team will also remain after the meeting to answer questions privately, should attendees wish to speak with a member of our team on a more personal level.

### ***Public Relations***

Applicant will address the unique challenges of operating a successful cannabis business with neighborhood compatibility in mind; a primary goal of our operations will be to minimize or eliminate any disturbances to those living or operating businesses near our facility so we can conduct business in a way that upholds our commitment to excellence, compliance and community stewardship. Applicant has developed an a plan to filter air and ensure no detectable odors escape the dispensary premise, as described in further detail in the response to *Records and Inventory*. As a component of this plan, a commercial-grade activated carbon air filtration system will be installed to effectively mitigate the likelihood of odor escaping the dispensary.

Applicant will post signage that spells out the "Prohibited Conduct Involving Marijuana and Marijuana Products" contained in Health and Safety Code in a conspicuous manner on the business premises for the education of patrons. The City shall develop a standard format and content for such signs.

As part of our commitment to education, Applicant will develop and implement an in-depth mandatory staff training program. Employee training will occur in both an educational, classroom style, as well as a practical, hands-on display of comprehension. Training topics will be vast and include information on customer service, patient confidentiality, fire safety, medical emergencies, and security, among others. Our training program will ensure all staff members are apprised of the most current local ordinances and state rules and regulations relevant to their position.

To ensure that the most critical information cascades through the enterprise quickly and accurately, important updates will be posted in common areas and sent via email to an all-staff distribution list. These updates may include information on regulatory changes, adjustments to Company policies, or information pertaining to employee rights. Before operations commence, Applicant will print, frame and prominently display our state and city licenses within the facility.

Applicant has established partnerships with experts in the cannabis industry to develop standard operating procedures (SOPs) and strategies that are innovative and highly effective. Applicant will conduct operations only between the hours of 8 a.m. and 8 p.m., and the facility will not play music or produce any other sound that may be detected at a disruptive volume during operations. Cannabis products will only be sold to qualifying purchasers between the hours of 8 a.m. and 8 p.m. Sampling of products and/or supplies on premises will be strictly prohibited. Applicant will also disallow physicians to conduct medical examinations or issue a medical certification document on premises for the purpose of obtaining a registry identification card.

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### ***Sourcing from Local Vendors***

Upon obtaining a license, Applicant will institute a program called 'Benicia First,' which mandates that every member of our company selecting a third-party vendor or supplier first review a list of prequalified companies directly from the City of Benicia. Applicant aims to work with local businesses and contractors whenever possible, pursuing mutually beneficial relationships that promote the local community while allowing Benicia to flourish. Examples of services and goods Applicant will be in need of upon licensure and during operations include, but are not limited to: construction and engineering; equipment supply; packaging; waste management;

laundering services; graphic design and printing; merchandise; technology providers; and dispensary design experts, among others.

Working side-by-side with the diverse residents and businesses of our community will enrich our company culture and ensure seamless integration as our business grows. We aim to be a role model employer and pillar of exemplary company values and business ethics, as we feel these elements truly uphold our definition of success. We will build business partnerships with other commercial entities and small businesses that share our ethics, culture and values to support and enrich the lives of local residents and patients while contributing to the development of Benicia's economy.

***World Class Security***

*Expert Security Personnel*

Applicant has engaged Chris Hester to serve as Security Director. Chris, an honorably discharged Marine Corps Veteran, is no stranger to strict protocol and ensuring the security and safety of people and premise. In this role Chris, will call upon his experience adhering to regulatory guidelines and transparent communication to refine and implement thorough security procedures. The Security Director will oversee all security personnel, the installation and maintenance of security equipment such as alarms and surveillance cameras, and for ensuring that the security measures implemented within the dispensary translate to a more secure business that will be a welcome addition to the surrounding community. He will also review all candidate background check information, including driving record information for delivery driver candidates.

*Enhancing Community Security*





*Our Commitment to Safe Citizens*

Adding to the veil of security described above, Applicant will pursue community-based safety and security trainings in an effort to equip employees with the skills required to handle emergency situations or respond to threats, including self defense training, tourniquet training, or CPR training. These trainings support Applicant's goal of promoting education and leaving a lasting, positive impact on Benicia. Applicant will work with Benicia's Community Emergency Response Team (CERT). Members of Applicant's staff will be encouraged to serve on the county's CERT program to aid in emergency scenarios or other events in which additional security and safety personnel is required. As a veteran, Chris Hester will also be tasked with connecting to Benicia's veteran community. Applicant recognizes not only the extreme importance of implementing an uncompromising security program, but also the opportunity that exists to work hand-in-hand with local law enforcement to improve the safety and preparedness of Benicia, as a whole.

***Conclusion***

Applicant plans to become more than a business that provides cannabis to qualified patrons; it will become a welcomed, trusted, and valued member of the community and a model of exemplary company principles and culture. Applicant is committed to actively serving the community as a responsible employer and neighbor. Through strict compliance with Benicia's City regulations, as well as California state laws and regulations, and by continuing open communication with neighbors and community members, Applicant will make a positive impact on the surrounding area. This focus will be embodied in every aspect of business operations.



By creating jobs, engaging in strong business relationships with local companies and organizations, educating the community, and providing the safest and highest quality cannabis products and service, Applicant will create an impact on the local economy for generations to come.

Applicant's executive and management team will meet regularly to discuss the Company's objectives and progress toward reaching each community related goal established by the Company. All-staff meetings, will be hosted at least twice annually, to discuss the Company's involvement in the community and encourage all employees to contribute ideas on how best to serve the community. While this neighborhood and community involvement response has been thoughtfully prepared, Applicant's team understands that community engagement must be a living process, evolving as the needs of Benicia evolve.



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**Urbn Leaf**  
**City of Benicia Commercial Cannabis**  
**Business Application Package - Retail Sales**

*Records and Inventory*

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***Developing and Implementing Standard Operating Procedures***

Applicant's Director of Operations will be principally responsible for developing and implementing Standard Operating Procedures (SOPs) to ensure that all procedures outlined within this section are clearly documented and able to be repeated by various members of the team. Applicant has developed a team of experts, ranging from finance to security to operations, to co-design all Company SOPs. Once developed, comprehensive training will be developed for employees to ensure that every member of the team understands how to access, read, and follow procedures. SOPs will be reevaluated every quarter, or any time a violation occurs, and changes will be made periodically to improve our overall operations. In the event that a violation occurs, the Management Team will review the concern, review the SOPs governing the respective area of the business, and will collaborate in the development of new procedures and policies.

***Securing Inventory***



***Inventory Control Measures***

Applicant will implement procedures to control and audit the inventory of non-cannabis materials and supplies; cannabis and cannabis products received from licensed distribution centers; record keeping documents; cash and financial documents; and waste inventory. Inventory reports and audits will be performed on a regular basis to discourage and prevent theft or diversion. Inclusive of inventory control is the assurance that free samples of any kind will not be distributed, in compliance with all regulations.

Inventory controls will be supported by multiple members of the Management Team, including the General Manager, and a designated employee from the sales staff. The General Manager will control and track inventory of all cannabis and cannabis-derived products, acquisitions, transactions, sales, and waste disposal, in alignment with regulations. The General Manager will work to implement best practices for controlling and reporting discrepancies in inventory and will perform regular auditing. The Assistant Manager will track and order inventory of all other materials and supplies required for operation. Further inventory control, and diversion and theft prevention, will be solidified through the implementation of on-site security personnel during business hours.

***Incoming and Outgoing Inventory Control***

Applicant will carefully track cannabis and derivative products received from licensed cultivators and manufacturers via contracted and licensed distributors. Following the verification of transportation credentials, including the shipping manifest, the incoming inventory will be thoroughly inspected as it is received at the dispensary,

## *Records and Inventory*

and upon approval, will be immediately entered into METRC™, the state-mandated track-and-trace platform. In accordance with regulations, incoming inventory will only be accepted during business hours and containers used during transport will be checked for clear and legible labels prior to inspecting the cannabis held within the secured transport containers for compliant packaging and labeling.

To comply with regulations imparted by the state of California and City of Benicia, all cannabis purchased or received at the dispensary will be required to pass mandated testing. These test results will be recorded in METRC™ prior to sale or transfer to a licensed dispensary. Incoming cannabis will bear the test results, and Applicant will request a certified, laboratory copy of the Certificate of Analysis for the test results associated with the purchased batches of cannabis or derivative products. If the incoming inventory and associated labels are incorrect, damaged, or missing, the package will be 'rejected' as part of the transfer and not entered into the inventory. In addition, Applicant will not have any form of cannabis at the dispensary that is not labeled, identified, and recorded into METRC™, pursuant to all regulations. Applicant will not transfer or sell cannabis or derivative products that are not recorded in METRC™.

All outgoing transactions will be entered into METRC™, and will be maintained and made available to the Bureau of Cannabis Control (Bureau) or a representative of the City of Benicia upon request, in accordance with regulations. The General Manager will verify that all cannabis and products within the dispensary has the appropriate batch number and identification tag or label. Any cannabis that is missing this information is prohibited from being sold, and will be immediately tagged or identified and the discrepancy will be reported to the General Manager for review. As sales occur, the identifying batch and tag information will be used to ensure accurate inventory reconciliation with METRC™ and Applicant's point of sale (POS) system. Labeling at the point of sale will include this identifying information for consumer safety, should specific inventory need to be assessed at any time.

### ***Auditing and Inventory Management***

The General Manager will conduct inventory audits to ensure accountability and accuracy of on-hand cannabis and derivative products. These audits are intended to record and reconcile acquisitions, sales, quarantines, and disposals, to limit the opportunity for diversion or theft of cannabis. Weighing devices used during audits or other business operations will be certified and calibrated, and maintained to conform to all state regulations.

Inventory audits provide an opportunity to conduct quality control reviews, ensuring that all cannabis in the inventory is safe for consumption. If any package is damaged, unusable, or otherwise compromised, the General Manager will quarantine the item in question, and prepare the plant material or product for disposal. The destruction and disposal of these quarantined products will be recorded in METRC™ immediately after the disposal. The General Manager will investigate and explain any shortages discovered during these audits, and will reconcile the inventory listed in METRC™ with the inventory physically present.

***Record Keeping and Record Maintenance***

Upon state licensure and when Applicant is approved to do so, a profile and account will be created within California's selected track-and-trace system, METRC™. Inventory and records of acquisitions, sales, and disposals will be entered into METRC™ daily, and reconciled during inventory audits. In the event that there is a system malfunction and METRC™ is unavailable, a hard copy of all transactions and inventory movement will be maintained and entered into METRC™ within 24 hours of the system regaining functionality.

Physical records will be stored in a locked, fireproof cabinet within the office, located in a limited access area and limited to designated employees and Bureau representatives. Records will not be intentionally damaged, altered, disposed of, or removed. Employees will be required to handle records with care to avoid damaging records and may not eat or drink near records or in records storage areas. Any employee that violates this provision will be subject to disciplinary action.

Applicant's HIPAA-compliant, electronic system for the storage and retrieval of patron information or other cannabis records will: guarantee the confidentiality of the information contained within; provide access to the Bureau; provide safeguards against erasures and unauthorized changes in data after the information has been entered and verified; contain a true audit trail indicating dates of edits or deletions to a patient record; and be capable of being reconstructed or retrieved within three business days, in the event of a computer malfunction resulting in the destruction of the database. To protect electronic records, Company computers will be protected with antivirus/malware software and daily security scans will be run as part of closing duties. Electronic records will undergo an encryption process and employees will be given a unique username and password which must be entered whenever accessing electronic records.

Inventory records will be maintained for at least seven years, as mandated, and can be produced within 24 hours per a request made by a representative of the City of Benicia or Bureau of Cannabis Control. The records maintained by the Applicant will be made available in either digital form or a hard copy, dependent upon the request made by the city or state.

### ***Importance of Patient Confidentiality***

Protecting patient confidentiality is of the utmost concern to the Applicant, and it will be the duty of every employee to maintain the confidentiality of each patient's information. Patient records will include, but are not limited to, their full name, address, telephone number, and a copy of the physician-issued recommendation or state-issued medical card. Applicant's dispensary will not offer physician recommendations on-site. Patient information is to be treated as confidential, including the fact that the patient receives, or has previously received, cannabis or cannabis-derived products from the dispensary. The privacy and confidentiality of patients' medical information is protected under state laws and federal Health Insurance Portability and Accountability Act (HIPAA) regulations. Employees will be trained to understand the importance of HIPAA and the ways in which Applicant's Company policies adhere to HIPAA regulations. No patient or customer information will be disclosed without the explicit informed consent of the patient or customer. The following Patient Confidentiality Plan will ensure that the privacy of our patients and customers is protected throughout every aspect of the dispensary operations in the City of Benicia.

### ***Guided by Regulations***

As a service provider exposed to patient health information, Applicant is subject to an exhaustive list of state and federal laws with respect to maintaining patient privacy and the confidentiality and security of patient health information. Employees may only disclose patient information to the patient or registered caregiver, and as permitted by HIPAA and other federal authority regulations. Patient approval must be sought for all disclosures of health information that do not fall within the three categories of disclosures outlined above. No patient information should be disclosed without the explicit, informed consent of the patient. Every employee is under obligation of law to comply with these laws, including, but not limited to:

- *Confidentiality of Alcohol and Drug Abuse Records*, 42 CFR Part 2
- *HIPAA Administrative Simplification Regulations*, 45 CFR Parts 160, 162

It is the responsibility of every employee, member of management, and owner to ensure that all employees follow standard operating procedures (SOPs) pertaining to patient record protection, as well as all record keeping policies and procedures, to ensure that the dispensary remains in compliance with all state and federal laws. Applicant's team acknowledges that the protection of patient confidentiality will result in a more positive, trusting experience for patients served at the dispensary.

All records, regardless of type, will be maintained for a period of at least seven years. A representative of the City of Benicia or Bureau of Cannabis Control (Bureau) may request the records, in either digital form or hard copy,

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and Applicant will produce the desired record and correct format within 24 hours of the request. In addition to patient records, manifests, or reports, the following records will be retained by the Applicant:

- Valid Seller's Permit from the State Board of Equalization
- Financial Records
- Personnel Records
- Training and Certification Records
- Commercial Cannabis Licensee Contracts
- Permits and Licenses as granted to the Applicant that allows commercial cannabis activities
- Security Records and Surveillance Recordings
- Proof of Ownership and Attestation regarding building use and business type
- Proof of Insurance

### ***Collecting Patient Data***

Patient records will be used in day-to-day operations to verify the identification of each patient and the validity of their patient registration, record the frequency of their visits, track their purchases, and log any other additional information required by the city and state. Patient records may only be accessed by authorized employees and are not to be shared with third parties except in compliance with HIPAA and other applicable state and federal laws. Each time an entry is made in a patient's file, the entry will be tracked through the employee's login credentials. Continual auditing and revision of patient record keeping policies and procedures will be implemented to reduce the risk of incidental disclosure and data loss, while maintaining efficiency and streamlining operations where possible. All patient purchase data that are entered into the point of sale (POS) system are automatically added to the patient's electronic patient file. These files are encrypted, password-protected, and employees must not divulge the information therein for any purpose not specifically authorized by law.

### ***Implementing HIPAA Compliant Technology***

Applicant will use, in addition to METRC™, an approved HIPAA-compliant POS and cloud-based record keeping system specifically designed to provide adequate safeguards for dispensary operations. HIPAA requires that any healthcare provider, organization or business handling patient records pertaining to healthcare follow procedures and processes that protect the confidentiality of such protected health information.

### ***HIPAA Compliant Record Keeping***

Applicant's record keeping policies are intended to promote standardized record keeping procedures which discourage diversion and unlawful release of information. Policies and procedures related to patient record keeping have been designed to ensure the confidentiality, integrity, and security of all patient health and business



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operations information. To that end, Applicant will implement: 1) technical safeguards; 2) physical safeguards; and 3) administrative safeguards to protect sensitive information. Each safeguard system is outlined in more detail below. Physical and confidential documents such as patient files, transaction records, and manifests will be securely stored, and access will be limited to authorized employees. Operations and security data and records will be backed up at regular intervals to prevent any loss of data, and all physical copies of records will be stored in a locked, fireproof file cabinet. Access to physical records will be controlled and closely monitored.

### 1) Technical Safeguards

Electronic Protected Health Information (ePHI) is exchanged during patient verification and patient transactions. When ePHI information is transferred electronically, it must be encrypted according to standards set by the National Institute of Standards and Technology (NIST). Encryption ensures that if ePHI is intercepted during transmission, the data is unusable, unreadable or indecipherable to unauthorized individuals. HIPAA has advised that encryption processes that follow National Institute of Standards and Technology (NIST) criteria meet the above requirement for encryption.

At time of submission, Applicant has begun evaluating HIPAA compliant systems for cloud-based storage. Storing information in a HIPAA-compliant cloud system is safer than using a localized server or paper documents, according to recent findings from the United States Department of Health and Human Services. Cloud-based storage vendors use health industry-preferred encryption products to protect data during transmissions and commercial-grade firewalls as the first line of defense for unwanted access to the system.

### 2) Physical Safeguards

While it is the intention to utilize cloud-based storage when possible, Applicant may need to utilize network attached storage (NAS) devices and/or hard drives in the event that Applicant cannot connect to the cloud-based storage server. Applicant has identified hardware and software solutions that protect data 'at rest,' meaning, data that is not in transit. All data stored on hard drives will be encrypted in accordance with HIPAA rules and regulations. Company computers will be protected with antivirus/malware software, and security scans will be run daily as part of closing duties. The Security Director will be notified immediately of any security risks and is responsible for responding to the threat in accordance with security policies and procedures.

Employees requiring computer access within their scope of work will be given a unique username which must be entered in order to access digital information. This username will be logged for the purpose of tracking employee access and usage. Employees will also be advised to create a password that contains both upper and lowercase letters, numbers, and special characters to decrease the chances of unauthorized parties gaining access to systems by password-guessing technology. Employees will be required to change their password every six months, or more frequently, as dictated by the Security Director.

### 3) Administrative Safeguards

### **Cannabis Product Inventory Auditing**

As part of Applicant's commitment to transparent inventory control, routine product audits will be included among the responsibilities of the Management Team. During an audit, the General Manager will:

1. *Count*: physically count all cannabis and incoming/outgoing packages
2. *Record*: keep written accounts (both analog and digital) of the physical count
3. *Reconcile*: compare findings of physical count to the purported on-hand inventory report from METRC™
4. *Report*: report audit data internally, and alert management and the Bureau of Cannabis Control (Bureau) of any discrepancies that cannot be explained by acceptable standards of product dehydration

### **Inventory Audit Events**

Audits allow not only for inventory management, but also provide an opportunity for quality assurance. The General Manager will assess the quality of both the product involved in the audit and the inventory control processes implemented at the dispensary. This affords the Management Team full visibility into the efficacy of the inventory systems and standard operating procedures (SOPs). The audit process and frequency is outlined within the table below:

<b>Frequency</b>	<b>Audit Description by Type/Frequency</b>
<b>Weekly Audits</b>	The General Manager will conduct a full, manual inventory of all cannabis that is ready for sale or transfer. With the physical count, the General Manager will also account for any sales or destruction conducted that week, and provide a record to the Management Team. That record shall include, but is not limited to: date of sale, batch-specific identifiers, strain name, weight or volume, and the method of destruction, if applicable. Once the weekly audit is completed and all records accounted for, the General Manager will summarize, date, and sign the audit.
<b>Monthly Audits</b>	Each month, the General Manager will conduct a physical count of all cannabis in the dispensary, including weights and measures of all packages, in accordance with Generally Accepted Accounting Principles (GAAP). The audit findings will be recorded internally and maintained with inventory records.
<b>Random</b>	The General Manager will occasionally perform spot-check audits that

<b>Audits</b>	are unplanned and unannounced. These may include choosing a unique identification number within METRC™ and ensuring that its physical location within the dispensary matches that reported in METRC™. The General Manager may also select a random package and weigh or measure the contents to ensure the validity of its reported weight or volume.
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**Audit Response**

If a discrepancy occurs between recorded inventory levels in METRC™ and physical material accounted for, an internal audit and investigation will occur, which includes review of surveillance footage and inventory records. If there is an error in the inventory, the General Manager will create a report, advising on the proper course of action, and recommendations to avoid issues in the future. Inventory control procedures will be reviewed and revised, as needed.

Depending upon the findings of the audit, and in consideration for state and municipal regulations, if theft or loss of any cannabis, derivative product, or other criminal activity is observed, Applicant will notify the Bureau, state police, the City of Benicia, and local law enforcement authorities within 24 hours. Applicant will communicate and cooperate with the Bureau and law enforcement agents, and complete a draft report of missing inventory, including: name and address of the dispensary; amount and type of material lost or stolen; date, time, and circumstances of the loss or theft; date the loss or theft was discovered and by whom; person responsible for the loss or theft, if known; and any other information relevant to establishing cause of the loss or theft. If an employee is suspected of diverting cannabis, they will be suspended immediately and the Bureau and law enforcement will be contacted pending an investigation.

**Financial Transaction Auditing**

Applicant's point of sale (POS) and the state-mandated track-and-trace platform (METRC™), will provide clear records of sales carried out during business operations. In addition to sales records, Applicant will maintain vendor invoices, receipts, banking statements, tax records, and other financial statements as required by the state of California. Financial records will be maintained for at least seven years, and will be made available within 24 hours to an authorized representative of the City of Benicia or the Bureau, upon request.

Designated employees will have access to sensitive financial and business records, and such records will be kept in digital format on appropriately encrypted devices, and in physical form within lockable, fireproof cabinets. Should these records need to be recalled for any reason, an internal authorization will be given to access the documents. Upon access, financial transactions will be compared and analyzed for accuracy by a member of the Management Team or an accountant with proper clearance. Dependent upon the nature of the transaction auditing, appropriate action

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will be taken in the event that false or misleading logs or entries are discovered. Financial transactions shall never include check cashing, and such activity will be prohibited at the dispensary, in compliance with regulations.

The state of California has selected the platform METRC™ as the track and trace software system to be used by all licensed cannabis businesses. This system will be utilized by all permanent, state licensees to provide transparency and accountability for inventory management within the permitted cannabis business. In accordance with state law and the City of Benicia's regulation, Applicant will create and maintain an active METRC™ account prior to commencing business. Should a system failure prohibit access to METRC™, Applicant will maintain a hard copy of all transfer, sale, destruction, and any other inventory movements to be entered into METRC™ within 24 hours of the system becoming available.

### ***Inventory Control Equipment***

METRC™ provides members of management and governing entities clear traceability throughout the dispensary. The system also allows the General Manager to track and record each day's beginning inventory, transfers and acquisitions, sales, deliveries, and disposals of cannabis or derivative products in real-time and METRC™-generated reports will provide the General Manager with real-time inventory data that can be used to prevent inventory shortages, respond to patient and customer purchasing trends, streamline inventory control processes, and identify diversion. Applicant will use radio frequency identification (RFID) tags and scanners in tandem with METRC™ to electronically record inventory of cannabis, cannabis-derived products, and cannabis waste.

Computer terminals will be positioned throughout the dispensary in the office, reception area, receiving area, and product disbursement stations. Each computer in the dispensary will be connected to METRC™, and the following equipment will integrate with the system, ensuring seamless, real-time tracking of all inventory:

- A digital scale that complies with regulations in the receiving area and secure storage to verify the weight of incoming inventory, during audits, and for waste logs;
- A label printer at the stations within the sales area to attach the required point of sale labels to outgoing packages; and
- Barcode/RFID scanners in the receiving area, secure storage, and at the stations within the sales area in order to track the internal movement of inventory.

### ***Inventory Tracking and Traceability***

While METRC™ will be used to ensure traceability within the state and city, Applicant will also utilize a point of sale software and hard copy records to maintain inventory transparency at all times.

### ***Inventory Documents***

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Applicant will use standardized forms and documents to record various inventory events in both digital and hard copy format. These documents track inventory interactions with licensed distribution centers, vendors, customers, and registered patients and caregivers. Inventory documents include: purchase orders; invoices; shipping manifests; Certificate of Analysis (COA) and test results; waste disposal logs; and inventory audit reports. Physical copies of these documents will be scanned and uploaded onto Applicant's cloud-based server and entered into METRC™, and hard copy versions will be stored on the premise in a locked, fireproof filing cabinet. Vendor-specific documents will be stored and categorized by vendor and date of record creation. Purchase orders, shipping manifests, inventory audit reports, COAs, and other internal documents will be stored chronologically and by document type.

### ***Inventory Events***

The inventory events listed below are most common within the dispensary and will be tracked using METRC™. METRC™'s integrated barcode/Rfid scanner provides members of management and designated staff quick determination of the location of inventory. Inventory events that will be tracked and traced include:

#### *Product Acquisition*

Applicant will acquire cannabis and cannabis-derived products through a secure transfer from a licensed distribution facility. When material is transferred, the corresponding batch information and package identifiers will be verified on the shipping manifest and accepted into METRC™. The shipment will be listed as a 'transfer' in METRC™ until a designated employee verifies and receives the transfer, formally assuming responsibility for the inventory.

#### *Waste Disposal*

Any occurrence of cannabis waste disposal will be reported in METRC™. Disposal may happen when cannabis or products are contaminated, spoiled, deteriorated, or other adverse situations. Rendering and disposal will occur under video surveillance and waste will be recorded on the waste disposal log to be entered into the corresponding batch or package in METRC™.

#### *Secure Transport and Delivery*

Applicant's process of transporting cannabis is outlined within Section 3.2(K) of this response, and includes policies for verifying delivery information in METRC™ and generating a shipping manifest through the track and trace platform.

#### *Recall*

In the event of a product recall, which would need to occur should cannabis be deemed dangerous, defective, or otherwise unsaleable, Applicant will implement its Recall Plan. METRC™ is able to determine which patrons purchased the cannabis or products subject to recall, and where the recalled material originated from.

*Sales*

Inventory approved for sale to patients and customers will be secured on the sales floor, where each sale will be recorded in METRC™ and the point of sale software. Items may be sold and removed from inventory in the form of a count (such as the number of vaporization oil cartridges sold), or a weight (amount of grams of cannabis flower sold). The distinguished inventory form will be consistent throughout the lifespan of the inventory batch. For instance, derivative products received as a count will be inventoried as a count, sold as a count, and reconciled as a count. Deviation from that form is not permitted in METRC™.

***Employee Use of METRC™***

METRC™ incorporates inventory tracking, sales, and record keeping modules providing clear traceability throughout the inventory management process. Each inventory event, including, but not limited to, acquisition, sale, recall, and disposal requires that the overseeing employee be signed into METRC™ using their personal login credentials. Employees may be logged into METRC™ for long periods of time, but will be required to sign out after the inventory event entry is complete and before leaving the dispensary at the end of their shift. Employees will be thoroughly trained to use METRC™ during new employee onboarding, and any time a feature or update is added to the system. METRC™ updates will also be incorporated into Applicant's standard operating procedures. Finally, employees will use METRC™ to conduct inventory audits and to generate inventory audit reports to be reviewed by management personnel on a weekly basis.

***Employee Identification***

Employees required to use METRC™ as part of their job function will be issued unique login credentials. METRC™ allows members of management to assign different permission levels based on each employee's role within the company, preventing employees from editing or changing inventory data in a way that could conceal diversion. This unique user identifier also allows management personnel to track each employee's interactions with Applicant's cannabis inventory. No employee will be permitted to share their login credentials with others or allow other employees to operate within their METRC™ user profile.

Applicant will implement and maintain packaging and labeling verification practices and procedures that provide clear instruction on how to comply with all state and City of Benicia regulations regarding packaging and labeling. Included in these procedures is verifying that the information provided on the label is legible, conspicuously placed, and accurate; and that packaging prevents contamination of product, maintains cannabis integrity, and adheres to shelf-life standards. Employees will actively maintain inventory with the required labeling by performing constant, observational audits for accurate, affixed labels in alignment with regulations.

### ***Label Integrity***

Distinct labels will be created dependent on the originating entity and the product for which the label is intended. Applicant has created guidelines for verification, regardless of the label design or product type. All labels will be inspected prior to being moved onto the sales floor:

1. During inventory intake, at the point of an incoming transfer, receiving employees will inspect the incoming packages for the appropriate tags and labels. Final product packaging will be closely examined to ensure the labeling is compliant, legible, and conspicuous.
2. At the point of sale, the Retail Associate will ensure that the labels on the items being purchased abide by company and regulatory standards. The Retail Associate will also verify that the label has not been tampered, destroyed, or otherwise made illegible.

Label requirements may differ slightly from product to product, however, the following will be included in the label verification: product and batch identifier; strain and origin information; licensee number; net weight or volume; test results of pharmacologically active ingredients; and associated warnings and mandated statements. The label shall be void of false or misleading statements or designs, and cartoons or images that may be appealing to minors.

### ***Importance of Packaging***

In accordance with California state regulations, Applicant will ensure that packaged cannabis and cannabis-derived products are enclosed in resealable, tamper-evident, child-resistant packaging approved by the Bureau of Cannabis Control (Bureau). During inventory intake, packages will be examined to ensure adherence to state and city regulations governing the packaging and labeling of cannabis. If packages are found to be defective or otherwise non-compliant, the transfer will be rejected and the packages will not be accepted into Applicant's inventory.



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Packaging may range in size and shape, dependent upon the cannabis or product contained within, but all packaging and labeling that is accepted into the dispensary will be verified that it is not attractive or appealing to minors, per regulations. Packaging not only provides a barrier against unauthorized access to cannabis, but it also protects the product being housed inside. Packaging plays a role in preserving the efficacy and aesthetic of cannabis and cannabis-derived products.

Applicant will conform to all state and City of Benicia regulations regarding testing, pursuant to regulations. Pursuant to California regulations surrounding cannabis laboratory testing, products arriving to the dispensary will be delivered by one of Applicant's previously identified, licensed distribution companies, which include: Choices, EdiPure, RVR, Indus, Korova, and Old Kai. Per the regulatory guidelines set forth by the Bureau of Cannabis Control (Bureau), licensed distributors must test all cannabis and cannabis-derived products that are maintained in their inventory and before disbursement. Applicant has confirmed that each of the aforementioned distributors possess a current license and will only utilize medical distributors for medical cannabis products and adult-use distributors for adult-use cannabis products. Periodically, Applicant will verify independently of their distribution partners, that the third-party laboratory is in good business standing with current state licenses.

***Certificate of Analysis (COA)***

Prior to transfer to Applicant's dispensary, all cannabis and products will have undergone required testing and will be accompanied by the third-party laboratory's COA which details the results of the testing. Cannabis products will also have all testing results printed on the final package's affixed label. The General and Assistant Managers will be responsible for ensuring that the selected distributor supplies Applicant with a valid COA that accurately corresponds to the batches being delivered. The employee overseeing the physical delivery and inventory intake will perform verification with the physical COA in hand, checking that the received packages' reported test results are included on the label.

***Testing Standard Operating Procedures (SOPs)***

Applicant will train all employees on the necessary identification of test results through examining COAs and test results reported on labels and in the state's tracking platform, METRC™. Cannabis and product transfers that do not have associated test results will not be accepted into Applicant's inventory, ensuring that the only items within the dispensary have been tested and display such test results. Applicant's SOPs will include COA and label verification instructions at the point of delivery, and at the point of sale as a secondary measure of testing assurance. As regulations and testing guidelines are updated, the General Manager will revise current SOPs to reflect those changes and train all employees on the updated procedure.

**Quality Assurance Best Practices**

Applicant will focus on quality management when identifying best practices to implement into standard operating procedures (SOPs). Deterioration of cannabis can occur through expiration or spoilage, contamination, or degradation from improper handling and storage. Applicant will call upon years of experience with industry best practices to uphold the quality and integrity of the inventory held at the dispensary.

Good Agricultural Practices and Good Handling Practices (GAP/GHP)

Although not a cultivator, Applicant will adhere to standards outlined in the U.S. Department of Agriculture's (USDA) GAP/GHP Audit Verification Checklist. These regulations were set in place to minimize and prevent contaminations by microbial pathogens. A subset of these topics is related to employee hygiene, personal protective equipment, and prevention of exposure to contaminants, and include: 1) employee health and hygiene practices will be documented in SOPs and in cultural practices; and 2) employee safety protocols in alignment with the Occupational Safety and Health Administration's (OSHA) recommended guidelines.

Inventory Rotation

The oldest viable inventory will be moved to the dispensary sales floor first, in adherence to a first-in, first-out (FIFO) inventory management protocol. FIFO will ensure products do not spoil or become unusable due to prolonged storage. In the event that cannabis or derivative products deviate from the FIFO process, a note of the variation will be made delineating the date, reason for the change, name of the employee responsible for the deviation, and the name of the approving supervising employee.

**Quality Controlled Storage**

Climate and Environmental Control

The secure storage area used to house inventory will be environmentally controlled to provide cannabis and cannabis products with an ideal storage climate. Proper storage conditions will support the integrity and extended shelf life of the inventory. Controlled climates will also provide optimal conditions in which to store cannabis and derivative products to mitigate the potential growth of pathogens or dehydration of product. Temperature and humidity will be carefully monitored and tracked to ensure that the HVAC, air filtration, and dehumidification units are working properly. Light is a factor of degradation if cannabis or cannabis products are exposed for prolonged periods of time. Lighting will be controlled and only utilized when employees are actively working in the space.

Product Organization

Cannabis and derivative products will be contained in their final packaging prior to arrival at the dispensary, which will aid the prevention of deterioration through protecting the perishable goods. These packaged items will be organized in the secure storage area, chronologically, by batch and receipt date. This system will ensure adherence to the FIFO method and prevent cannabis or products from spoiling due to expiration.

### ***Maintenance and Prevention***

#### ***Cleaning and Sanitation***

The dispensary will be regularly cleaned and sanitized, and sanitizing agents will be stored away from any cannabis or cannabis product. Dispensary employees will be trained to handle these agents and are responsible for daily and weekly cleaning tasks, delegated by the General and Assistant Managers. At the end of each day, surfaces and product display cases will be wiped down and sterilized, and floors will be swept to remove debris. Employees will be responsible for the upkeep and maintenance of all restroom and hand washing facilities, as well as cleaning interior windows and walls. The dispensary will be mopped at least once weekly, with intermittent floor maintenance implemented, as needed. Floor rugs will be cleaned, sanitized, and returned on a regular basis by a contracted, third-party cleaning service. Surfaces or equipment used for the storage or handling of cannabis will be sanitized to food-safety standards. As cleaning tasks are completed, employees will be responsible for properly disposing of used cleaning media and debris; returning sanitation agents to the dedicated storage area; and thoroughly washing their hands and lower arms.

#### ***Contamination Prevention***

To prevent contamination, the dispensary will be compartmentalized and points of ingress or egress will be kept securely closed when not in use. Compartmentalization allows for measurable environmental parameters and focused climate control, preventing cross-contamination within the dispensary, while encouraging stability. These measures ensure contamination prevention by limiting the movement of pests, and development of pathogen or biological contaminants. Dispensary employees will be prohibited from bringing food or liquid out of the designated break area, and must maintain proper hygienic practices including washing hands often and not dispensing cannabis while ill. Clean, disposable, non-latex nitrile gloves will be worn when handling cannabis, if needed, to prevent exposure to skin and contaminants.

### ***Product Recalls and Unsaleable Cannabis***

Applicant has developed a Recall Plan to handle adverse events including suspected contamination or expiration of cannabis; non-compliant packaging or labeling; or a Bureau of Cannabis Control (Bureau)-dictated recall. The General Manager (GM) is responsible for enacting the Recall Plan within 24 hours of receiving notice of a recall, and for: assessing and responding to complaints; identifying cannabis that should be included in the recall; notifying the patrons who have purchased the

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cannabis in concern; processing refunds or issuing replacements; quarantining impacted cannabis, internally; following Bureau instructions pertaining to destruction of recalled product; tracking and documenting all related actions taken during the recall event; maintaining accurate inventory; and managing all outbound communication from the dispensary to affected entities, license holders and the Bureau. The Recall Plan is summarized in the table below:

<b>Identifying Affected Product and Notification</b>
When the Recall Plan is initiated, the GM will first notify the Bureau by phone within 24 hours and will also notify the Bureau by email to ensure that the notification is received by a Bureau representative, and to facilitate record of the notification. The GM will then begin identifying the location of all cannabis involved in the recall, through use of their traceable identifiers established in the track and trace system. METRC™ will be utilized to determine the location and immediately quarantine any affected product that still remains in the dispensary. Pending transports of affected product will be canceled and the recipients will be offered an alternative product or refund. METRC™ will assist in the generation of a list of customers that received the recalled product. Once the list of affected patrons is developed, the GM will contact each individual to inform them about the recall circumstances and to relay directions on how to return or destroy the recalled product. Telephone notifications will also be communicated by email notification to ensure that those impacted by the recall have clear instructions and that there is record of the communication.
<b>Product Retrieval and Quarantine</b>
All product identified for recall will be quarantined immediately in the dispensary and labeled with a red "QUARANTINE" label. Product will be stored carefully, away from other saleable product, to prevent against cross-contamination and will be locked in the secure storage area.
<b>Destruction</b>
Applicant will not destroy recalled product until given authorization by the Bureau, acknowledging that the Bureau may require additional testing of the product before it is formally destroyed. Upon receiving approval to destroy the recalled product, the GM will record the name and quantity of product involved and will destroy the product in accordance with the waste disposal plan.
<b>Records</b>
Applicant will document all complaints triggering or related to the recall. All notifications and communications to the public, licensees, customers, the Bureau, and internal employees will be stored both physically and digitally to demonstrate

### ***Secure Transport and Delivery***

Applicant has developed a Secure Transport Plan outlining the process of transporting cannabis to a qualified purchaser. This Plan has been designed to limit diversion, loss, or theft during transport while protecting employees and the public. Delivery drivers accompanying the transport must carry the appropriate transportation documentation, and a valid California driver's license. Transportation credentials will be verified for incoming cannabis deliveries.

Applicant has designed a secure loading and unloading area in the back of the building with a roll up door, then shut the door creating an interior secure loading and unloading area.

### ***Using METRC™ for Cannabis Transfers***

Applicant will maintain an active METRC™ account to comply with the state's regulation for using a track and trace system for inventory management and visibility, and in accordance with regulations. Within METRC™, both incoming and outgoing transfers of cannabis and cannabis-derived products will be registered and managed.

#### *Outgoing Cannabis Transfers*

Applicant will conduct outgoing transfers in the form of deliveries made to patrons who qualify. To complete outgoing transfers, Applicant will perform these steps:

1. Qualified Purchaser and Location: Ensure the intended purchaser is a qualified individual, which will also be verified at the point of transaction through verification of identification. The location will be confirmed to be a physical address in the state of California.
2. Inspect Vehicle and Plan Route: Prior to loading the delivery vehicle, the delivery driver will inspect the vehicle to certify functionality and safety. Tire pressure; fuel level; turn signals; secure communication devices; GPS/tracking devices; and insurance documentation will be checked before departure. The driver will also check for security threats or safety concerns and communicate those to the Security Director immediately. Applicant will strictly prohibit vehicle usage for the transportation of cannabis if the vehicle requires mechanical maintenance or has an outdated insurance policy. The driver will assess the planned delivery route for efficiency and safety. The intended route will then be populated into the transportation documentation. Delivery drivers will pull into the secure, enclosed loading and unloading area.
3. Process Order: As an employee is creating a delivery order, they will certify that all packages meet regulative and company standards; that all labels are visible

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and accurate; and that the transportation vessel is secure and under surveillance until removed from the dispensary. The employee will record and register the outgoing delivery in METRC™, as well as on the point of sale system. The delivery receipt and shipping manifest will be created to accompany the delivery.

4. Preparing for Delivery/Secure Transport: Outgoing packages will be placed in a secure, opaque, lockable container. This will ensure the safety of the delivery driver and product, while preventing degradation and observation of cannabis outside of the vehicle.
5. Confirm Delivery: Upon arrival to the receiving purchaser, the delivery driver will confirm that the identification is valid. They will then confirm the packages with the customer, and receive a signature on the transport documentation and payment for the sale. The driver will give the customer their copy of the delivery receipt and return to the dispensary.

### *Incoming Cannabis Transfers*

Applicant will receive incoming transfers in the form of cannabis and cannabis-derived products supplied by licensed distributors. With each transfer, Applicant will perform the following steps:

1. Verify Licensed Commercial Cannabis Business: Certify that the originating entity is, indeed, a licensed business and registered in METRC™ with applicable permits and documentation. This license number will be used for verification upon arrival and for inventory record keeping purposes.
2. Coordinate Delivery: Deliveries received from licensed distributors will be coordinated by the General and Assistant Managers in order to accommodate ample employee coverage to securely inspect and accept shipments while maintaining operations. Deliveries will arrive in the secure loading and unloading area that is enclosed and monitored by video surveillance equipment.
3. Verify Transport Credentials: Incoming deliveries will be accompanied by a METRC™ generated shipping manifest, invoice, test results in the form of a Certificate of Analysis (COA), and any other form of documentation requested by Applicant of the vendors. Employees will also request the identification of the driver to compare to the credentials entered into the shipping manifest. If any piece of transport documentation is missing or incorrect, the transfer may be rejected.
4. Inspect Incoming Product: All incoming cannabis and derivative products will be aggregated into packages and each package will have an assigned, unique radio frequency identification (RFID) tag to be used for tracking during transport and through to sale. Once documentation is approved, the contents of the shipment will be inspected for quality and compliance. Product that is accepted will be verified using the RFID tag and the shipping manifest. The same tag identifiers will be electronically added to Applicant's inventory once the transfer is 'accepted' in METRC™.

### ***Transfer and Transport Documentation***

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Incoming and outgoing transfers are required to have specific documentation to ensure the validity of the transport, and to maintain control of inventory and product movement. Drivers will carry a copy of their respective licensed entity's Commercial Cannabis Business Permit, at all times, in addition to the documentation described below.

### *Shipping Manifest*

The state's track and trace system, METRC™, generates a shipping manifest that details the license number, name, and contact information for the originating entity and the following information for the receiving entity: 1) license number if the destination is a licensed distributor, or qualified purchaser identifier; 2) address of the destination; 3) name and contact information of the licensee, or contact information for the qualified purchaser; 4) quantities by weight or unit of each type of cannabis or derivative product contained in transport, along with the RFID tag numbers for every item; 5) the date of transport and approximate time of departure; 6) arrival date and estimated time of arrival; 7) identity of the driver accompanying the transport; and 8) delivery vehicle make, model, and license plate number. The manifest will be signed upon delivery and Applicant will maintain a copy of all manifests for their records.

### *Delivery Receipt*

The employee preparing the delivery and creating the transportation documentation will populate a delivery receipt. In accordance with regulations, each delivery receipt prepared by the dispensary will include the following:

- Name and address of the licensed dispensary;
- Name of the employee who prepared and delivered the order;
- Date and time the delivery request was made;
- Complete delivery address;
- A detailed description of the cannabis goods requested for delivery, including the weight or volume or any accurate measure of the amount of cannabis goods requested;
- Total amount paid for the delivery including any fees or taxes; and
- At the time of transaction, the date and time the delivery was made, and the signature of the person who received the delivery.

The receipt will be maintained by both the dispensary and the receiving purchaser. The receipt will accompany the delivery driver back to the dispensary with the remaining, signed transport documents and payment.



**Introduction**

Cannabis businesses, including dispensaries, generate different forms of waste requiring various disposal procedures. The following Waste Disposal Plan describes the various types of waste that may be generated at a dispensary, method of disposal for each classification of waste, and record keeping procedures that align with each phase.

The Waste Disposal Plan has been developed by Applicant in alignment with regulations, with consideration for the City of Benicia's Refuse/Solid Waste Division, and details the comprehensive processes for safe and compliant disposal of each type of waste. As a dispensary, Applicant will dispose of non-cannabis waste, limited chemical waste, and, occasionally, cannabis plant or product waste during the normal course of operations. Non-cannabis waste, chemical waste, and cannabis waste may be generated during the following stages of operations:

<b>Waste Classification</b>	<b>Description of Waste Generated</b>
<b>Compromised Cannabis</b>	Cannabis that has accidentally come in contact with the floor or any another unsanitized surface is automatically considered cannabis waste. Quality assurance controls, such as visual observation used during the auditing process, will provide additional means of determining whether cannabis is compromised through means of contamination or spoilage. Any compromised cannabis will be treated as waste.
<b>Unsatisfactory or Unsaleable Cannabis</b>	Cannabis that is securely stored within the center will be monitored to ensure its quality and condition. An expiration date range will be implemented in order to maintain a standard of quality. Material that is contaminated, expired, or otherwise unsatisfactory will be treated as cannabis waste and destroyed according to the disposal and waste removal procedures. All recalled, expired, or spoiled cannabis and cannabis-derived products will be considered waste. Any recalled product will be immediately quarantined and removed from inventory within 24 hours of the notice of recall.

**Waste Disposal Areas**




Designated areas within the dispensary will store waste; these areas will be monitored by surveillance and secured at all times. Cannabis waste will remain locked in secured containers and monitored by constant surveillance until it is properly disposed of, in accordance with California and Benicia requirements. Dedicated waste

areas will be kept clean and orderly, and will undergo a detailed, deep clean weekly. During the deep cleaning process, walls, floors, and tables will be sanitized and disinfected to prevent contamination, insects, rodents, and other pests. This area will remain locked, ensuring limited access to authorized personnel only.

External waste collection areas will be constantly monitored, and dumpsters will be equipped with a locking mechanism to prevent unauthorized access. Security cameras will be installed on both the exterior and interior of the area at a minimum of two juncture points so that several vantage points can be viewed on monitors recording activity 24 hours per day, seven days per week.

**Non-Cannabis Waste**

Non-cannabis waste will be disposed of in accordance with Benicia, federal, and state laws. General waste will be removed in a timely manner and will be contained to prevent unpleasant odors, contamination, or the attraction of pests in areas where cannabis is displayed and sold. Applicant will dispose of non-cannabis waste in an environmentally conscious manner, as described herein:

Type of Non-Cannabis Waste	Sample Image of Receptacle	Disposal Process
<p><b>Trash and General Refuse</b></p>		<p>Properly labeled trash bins will be placed throughout the center, collecting any non-cannabis, non-recyclable, non-hazardous waste generated in the dispensary. A large, locking dumpster will be located outside the center and regularly picked up by a local trash service.</p>
<p><b>Recyclable Materials</b></p>		<p>Blue recycling containers will be placed throughout the center to collect common recyclable items such as newspaper, aluminum, plastic, glass or cardboard. A large recycling container will be located outside the center and regularly picked up by a local recycling arm of the Benicia Public Works service.</p>
<p><b>Sensitive Documentation</b></p>		<p>As a dispensary, Applicant anticipates the handling and storage of confidential and sensitive records. If a record or piece of documentation is in need of disposal, designated employees will verify that the record is ready for destruction and it will be</p>

*Records and Inventory*

		placed into a locked bin that is routinely picked up and destroyed by a contracted document shredding and disposal entity.
<b>Liquid Waste</b>	Pursuant to regulations, discharge of toxic, flammable or hazardous materials into city sewer or storm drains is prohibited. Water used in sinks, toilets, or other normal, non-hazardous use will be drained into the municipal sewer/wastewater system. Applicant will ensure cleaning solvents or other sanitizing substances that are disposed of in the wastewater system are nontoxic and diluted as they are drained, and in accordance with regulations put forth by the California Regional Water Quality Control Board.	

Non-cannabis waste, such as general trash and garbage, including recyclable refuse, and liquid waste will be disposed of following the clear processes described above. Whenever possible, waste management will be handled in an environmentally conscious way, with consideration for California and Benicia waste removal regulations.

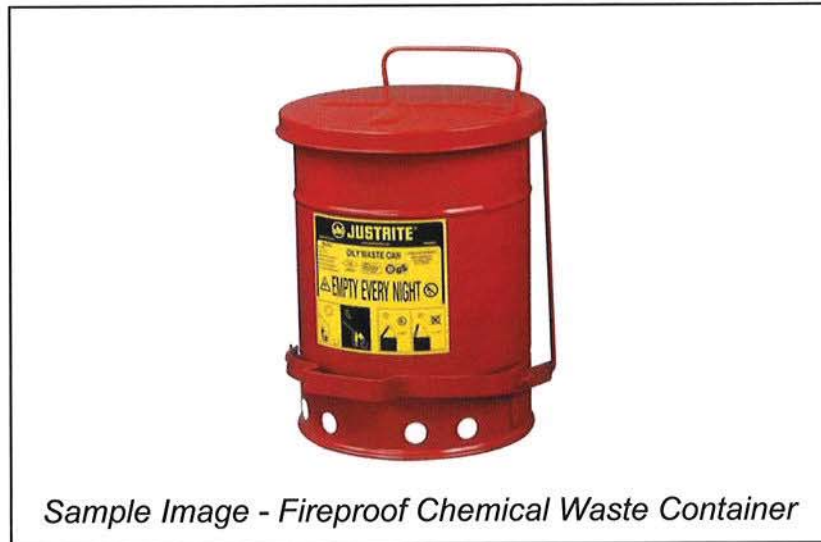
***Chemical Waste***

While we do not anticipate disposing of many chemicals or hazardous substances in the dispensary, chemical waste will be managed pursuant to Benicia's standards for Household Hazardous Waste (HHW) handling. If hazardous waste is generated, it will be kept in a locked container clearly labeled as "Hazardous Waste" with the appropriate NFPA 704 hazard signage and located in the waste holding area. Hazardous chemical waste will be routinely taken to the appropriate HHW handling facilities within Benicia.

Toxic, flammable or hazardous materials, including common items such as isopropyl alcohol, will be properly labeled, stored, and not discarded into city sewers or storm drains. Solvent waste will be carefully collected in clearly labeled liquid chemical waste containers to be removed through coordination within the dispensary for HHW removal. Employees will be trained to read manufacturer labels and research proper disposal of solvents and sanitation substances prior to disposal, especially with regard to state and local regulations for HHW.

Chemical waste has the potential to harm the environment, animals or humans if not properly disposed of, and will be handled with great care and concern. For instance, isopropyl alcohol waste is a common byproduct of cannabis business entities, as it is used in cleaning and removal of resinous residue; it is highly flammable and poses a risk of combustion, even in enclosed sewer systems. Applicant will ensure that isopropyl alcohol waste and cleaning materials containing isopropyl will be placed in a fireproof, closable container, and then collected for disposal when the hazardous waste is completely contained. Other chemical waste may include cleaning compounds and

sanitizing agents. All hazardous waste will be conspicuously labeled and disposed of by the dispensary.



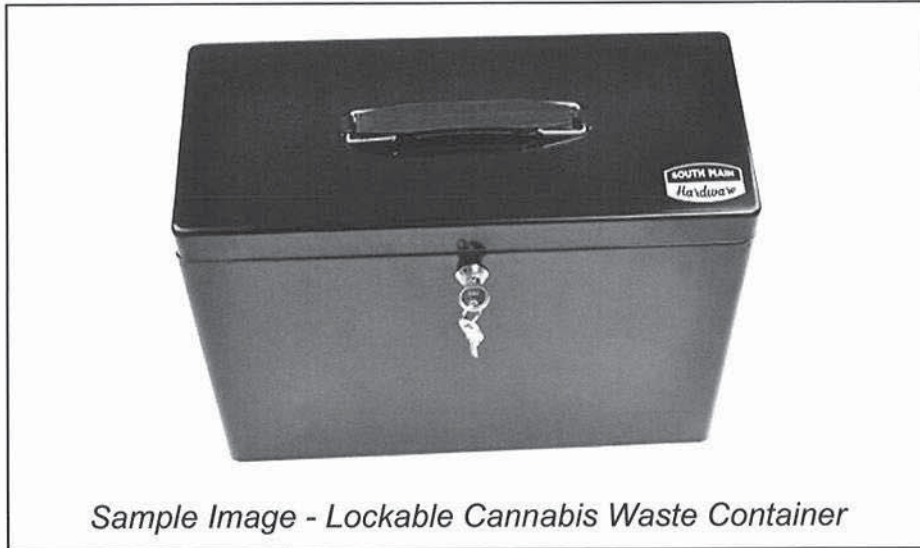
### ***Cannabis Plant and Product Waste***

Applicant will not sell cannabis waste, or cannabis products that are to be destroyed or that the Bureau or City of Benicia orders for destruction. Cannabis waste generated during dispensary operations may include: cannabis that does not meet or exceed quality assurance standards; and cannabis that comes into contact with unsanitary surfaces, or is otherwise deemed unsaleable. Cannabis that is to be destroyed or is considered waste will be rendered into an unusable and unrecognizable form and recorded in METRC™, the statewide track-and-trace system. Destruction and disposal of cannabis waste material will be performed in the designated, secure area within the dispensary. All steps taken to render the cannabis unusable will be performed under video surveillance, and at a minimum, activity will be recorded from the time the rendering and destruction begins until unusable waste is placed in a locked dumpster and removed from the facility.

### ***Waste Collection, Destruction, Disposal, Removal, and Record Keeping***

#### *Waste Containers*

Non-cannabis waste will be collected into separate, designated bins, depicted above, located throughout the dispensary. Lockable containers will be designated for cannabis plant and product waste, should the dispensary have an occurrence where cannabis waste is generated. These bins will be conspicuously labeled, "CANNABIS WASTE ONLY," kept under clear video surveillance, and placed in an area equipped with an available scale, for weighing and recording prior to depositing the cannabis waste into the lockable container. Weighing devices used during audits or other business operations will be certified and calibrated, and maintained to conform to all state regulations.



Before discarding waste in a container, the employee will weigh or measure the cannabis that is to be discarded, under the supervision of the shift manager, recording identifying information for each batch or item in a disposal log. Refuse containers for other waste will be placed strategically, as needed, throughout the center to collect for paper, other recyclables, and non-recyclable, non-cannabis waste. These waste bins will be appropriately categorized and will contain a label saying “NOT FOR DISPOSAL OF CANNABIS WASTE.”

Waste Collection and Destruction

The table below describes the processes in which employees will be instructed to handle waste:

<i>Waste Collection at End Of Day</i>
<ol style="list-style-type: none"><li>1. Collect waste containers at the end of each business day and remove trash liners.</li><li>2. Insert new liners into the emptied waste containers, if applicable.</li><li>3. Seal and take waste to the holding area.</li><li>4. If cannabis waste is included in this collection, record: date and time of waste collection; operation from which waste was generated; batch, harvest, or package identifier; total weight of waste collected, separated per identifier; reason for waste; and name and identification number of the employee who collected the cannabis waste.</li><li>5. Return waste containers to their respective locations.</li></ol>
<i>Waste Destruction</i>

Cannabis waste will be rendered unusable in a designated area, referred to as "cannabis waste destruction." To prevent unauthorized access to waste, this area will be monitored and secured. At the end of the business day, an employee with approved access will move all waste that has not already been collected to this designated area. Applicant will designate specific employees to have clearance to perform cannabis waste destruction. Cannabis waste destruction will be achieved via the following process:

1. Cannabis waste will be combined with one or more approved, non-consumable, solid wastes until the final mixture reaches at least 51% non-cannabis waste. This may be achieved by mixing an equal volume of paper, cardboard, food or yard waste, or soil.
2. Once the incorporation of non-cannabis waste is complete, the resulting mixture shall render the cannabis unusable and unrecognizable.
3. The employee will secure and lock the dumpster, after depositing the incorporated mixture that is sealed in an opaque trash liner.

While performing cannabis waste destruction duties, employees will be under constant video surveillance from the time destruction begins until the final waste is placed in a locked dumpster and is removed from the facility. The employee overseeing the cannabis waste destruction will maintain a record of the destruction. The record will include the:

- Date and time of destruction;
- Manner of destruction;
- Volume and weight of approved solid waste used to render the cannabis unusable;
- Batch identifiers (batch number, package number, strain, originating license number, volume, weight, or unit count) involved in the destruction; and
- Signature of the employee overseeing the destruction.

### ***Waste Removal***

Consistent waste removal is vital for proper sanitation and premise maintenance. Areas and equipment utilized for the purpose of waste management will be regularly cleaned and sanitized, as to not attract pests or rodents, and to mitigate the possibility of contamination. Contracted third-party services will be scheduled to pick up non-cannabis waste, recyclable materials, and destructed cannabis waste in a mixture that is at least 51% non-cannabis. The schedule of such pickups will be frequent enough, one time per week at a minimum, to not allow a backstock of waste at any time.

### ***Cannabis Waste Disposal Log***

Each time cannabis waste is disposed of, the event will be recorded on a cannabis waste disposal log. A supervisor will need to sign off on the disposal to provide evidence that the disposal weight was accurate and that the disposal was

## *Records and Inventory*

warranted. The waste will be weighed on a calibrated, certified scale. The employee disposing of cannabis waste will record in the waste disposal log the:

- Weight, in grams or volume, of the waste being disposed;
- Date and time of the disposal;
- Reason for disposal;
- Product name, if applicable;
- Strain Name;
- Batch number;
- Harvest identifier, if applicable;
- Name and identification number of the employee; and
- Signature of the attending supervisor.

The disposal of cannabis will be recorded at the end of each business day in METRC™ by the authorized supervising employee overseeing disposal practices.

***Sustainability Introduction*** Applicant understands the importance of instituting sustainable business practices and will encourage environmentally conscious practices among employees, such as cycling to work, carpooling, and use of electric vehicles. As a burgeoning industry, cannabis businesses must be conscious of the impact that the regulated market has on the environment and our habitats. Applicant will actively pursue emerging best practices and fixtures and equipment that support the commitment to sustainability. Should the City of Benicia make its own CEQA review or assessment, Applicant's prepared to conduct and pay for any required California Environmental Quality Act (CEQA) reviews or assessments.

### ***Energy Usage***

Applicant will implement and utilize technology to reduce the energy needed for operations within the dispensary. Applicant understands the importance of efficient energy use and has considered proactive ways to reduce the facility's energy dependence. Applicant will strive toward LEED established standards wherever possible, looking to these standards before selecting fixtures, lighting, furniture, and other facility installments.

#### ***Energy Efficient Lighting***

LED fixtures are widely accepted as the most energy efficient option for general lighting. The proposed facility will implement energy efficient LED bulbs in all lighting fixtures. Motion detecting sensors will illuminate spaces that have personnel actively working within the area. The sensors will turn off lights when motion is not detected, mitigating unnecessary lighting and energy usage. Lighting fixtures installed in rooms with exterior windows will be dimmable to reduce energy and lighting use during bright, daylight hours.

#### ***HVAC and Climate Control***

Applicant will implement highly efficient HVAC and environmental controls. These systems will be maintained with regular cleaning and filter replacement, ensuring optimal operation while reducing the risk of mechanisms requiring excessive energy. Renovation and construction materials will be carefully selected to act as proactive, preventative barriers that form a permanent insulation which will reduce reactive, superfluous heating and cooling within the dispensary.

#### ***Efficient Practices***

Employees will be trained on acceptable energy usage and ways in which they can reduce their use of electricity in the dispensary. For example, one of the most common, unnecessary uses of energy is chargers and adapters left plugged into a



power source while they are not actively charging an item. Employees will be instructed to remove such items and to be conscious of electronics pulling energy without being used. Computer terminals will be placed on energy-saving stand-by modes, further eliminating excessive energy use.

***Water Usage***

To be cognizant of the water used in the dispensary, restrooms and handwashing sinks will contain low-flow fixtures, and will be monitored to limit unnecessary loss of water due to leaks or ruptures.

***Reduce, Reuse, Recycle***

Applicant will strive to operate a dispensary that produces as little waste as possible. Any waste created at the dispensary will be disposed of pursuant to regulation, and in an environmentally conscious manner. Excess paper waste will be reduced by digitizing and automating as many reports and files as possible, by setting printer defaults to double-sided printing, and by providing employees with accessible recycling bins. Waste and recycling bins will be provided in every office, sales station, and break area with clear signage indicating the proper method for sorting recyclable materials including, paper, plastic, glass and food waste.

Waste and recycling will be sorted, and recyclable material will be separated and designated for removal by a City of Benicia recycling division. Applicant will use environmentally friendly cleaning agents, however, any potentially hazardous materials will be disposed of in a fashion that does not pose a risk to the municipal wastewater system or employees who handle the materials.

***Recycled, Efficient Supplies***

Whenever possible, environmentally friendly supplies including printer paper, paper towels, plastic trash bags, and cardboard boxes will be made from recycled materials and will be recycled after use. Applicant will research and source office supplies and equipment with careful consideration for the environmental impact of these products, including materials sourced from local manufacturers that are comprised of recycled content. Applicant will evaluate the energy efficiency rating when purchasing appliances or electronics for the dispensary, such as television or computer monitors, and copy machines.

## **Introduction**

Applicant understands the importance of controlling odors that could emanate from the dispensary, potentially impacting neighboring businesses or the surrounding residents and community. To prevent this, Applicant has developed and will implement a comprehensive Air Filtration and Odor Mitigation Plan, which includes the use of technology to control and neutralize odor and mitigation best practices. The dispensary will feature an activated carbon air filtration system for effective mitigation of discernible odors emitted during the normal course of operations. This system will be designed to control and prevent the emission of odors beyond the interior of the dispensary.

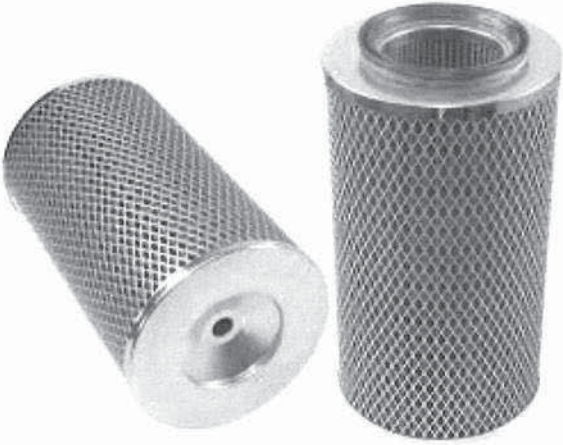
## **Odor Mitigation Procedures**

Employees at the dispensary will be trained to recognize and address any actions that may increase the emission of odor within the facility including ensuring that points of ingress or egress remain securely closed when not in use. Doors shall not be propped open, and secured doors are not only vital for maintaining a secure, limited- and restricted-access facility, but also as a means of controlling the spread and permeation of odor.

Upholding the maintenance of all air filtration and odor mitigation units, especially conducting filter changes, will greatly improve the efficacy of the system. Dispensary employees will be thoroughly instructed on the operational standards and maintenance needs of the air filtration and odor mitigation components. Per a predetermined maintenance schedule, and as needed after events that would warrant this action, all components of the air filtration and odor mitigation units will be cleaned and sanitized. At this time, filters used throughout the system will be observed for efficiency and cleanliness. The carbon filters will be changed in accordance with the manufacturer's instructions, and a log will be kept detailing the maintenance completed on each component.

## **Odor Mitigation Equipment**

While a dispensary may not emit as much odor as other cannabis businesses such as a cultivation or processing facility, mechanical intervention is necessary to mitigate odors and purify the air in order to prevent harmful pathogens. In accordance with the municipal regulation governing odor mitigation and air filtration, Applicant's dispensary will be equipped with an activated carbon filtration system that will purify air and control odor emitted from general business operations. Odors will not be detected outside the building, from public rights-of-way, or on adjacent properties. The equipment below is in addition to the Odor Abatement Plan provided separately.

<p><b>Activated Carbon and HVAC</b></p>	<p>The main component of the air filtration and odor mitigation system is the configuration of a highly efficient activated carbon filtration system that works in conjunction with a highly efficient HVAC network. Activated carbon filtration is used to remove impurities from the air, which includes airborne molecules that produce odor. HVAC duct work will be strategically placed to direct air flow to the activated carbon filters in order to purify the air and mitigate odor within the center. Adequate air movement and proper filtration will also mitigate the risk of pathogen development and fungal growth, such as mold and mildew.</p>
 <p><i>Sample Image - Activated Carbon Filter</i></p>	

**Addressing Complaints**

Applicant is invested in becoming a compatible and welcomed member of the surrounding neighborhood and the city of Benicia. In the interest of fostering great relationships with neighbors and the community, Applicant will implement an anonymous comment system whereby individuals can share their questions or concerns directly with dispensary management. If a complaint is received regarding the emission or detection of odor, Applicant will immediately assess, address, and respond to the complaint.

**Summary**

Through the implementation of a highly secure and compartmentalized dispensary design, Applicant will be able to adequately control the odor emitted during general business operations. Securely closing doors and points of ingress will manage the spread and permeation of odor, reduce contamination, and maintain the negative air pressure needed to control the flow of odor molecules. Plant material and product containment will naturally mitigate odor by reducing the amount of exposed cannabis

## *Records and Inventory*

within the dispensary. Well-maintained equipment in the form of activated carbon filtration and strategically placed HVAC components will act as mechanical intervention in the process of mitigating odors. As a final measure, Applicant will continue to assess odor emissions and analyze the efficacy of the odor mitigation efforts, ensuring that cannabis odor does not extend beyond the interior of the dispensary.

***Maintaining the Premise***

*Signage and Aesthetic*

The Applicant team boasts a great deal of experience both in the cannabis and non-cannabis retail industries. Inclusive of both industries is the need for suitable branding, marketing, and premise signage. Applicant will ensure that the signage and exterior of the dispensary is not attractive or appealing to minors, as defined by the state of California and in alignment with regulations. Temporary signs will not be used, and permanent signage that is affixed to the exterior of the facility will be limited to a singular sign that measures within twenty (20) square feet. Signs, advertising, or other observable methods of communication installed and utilized on the interior of the dispensary will not be visible from the exterior. Interior signs and posters will include a consumption prohibition statement (described below), and signage that legibly states: "THE CITY OF Benicia HAS NOT TESTED OR INSPECTED ANY CANNABIS PRODUCT FOR PESTICIDES, OR OTHER CONTAMINANTS, DISTRIBUTED AT THIS LOCATION"; which will be conspicuously placed inside the dispensary, in accordance with regulations. A copy of the Commercial Cannabis Business Permit that allows for licensed retail activity will be displayed and readily visible.

Aside from signage, Applicant will maintain the aesthetic, safety, and security of the premise by conducting daily inspections to ensure the maintenance of both the interior and exterior of the dispensary, and mitigating the possibility of graffiti, trash, or litter from disrupting operations or impacting appearance of the premise. The proposed site abides by all Benicia zoning guidelines for commercial cannabis businesses and is not within the prohibited radius for schools, day care or youth centers, libraries, or public parks. The premise will be reconstructed and outfitted to conform to the needs of the dispensary and future physical modifications will not be completed without prior, written permission from the City of Benicia, in accordance with all regulations. Applicant will ensure that parking at the proposed site is in alignment with the City of Benicia Municipal Code, including adequate handicapped and accessible parking spots as required by the California Building Code.

*Sanitation and Maintenance*

A clean and orderly dispensary will be maintained to preserve aesthetics and prevent pests and other sources of contamination. Counter tops will be cleaned and floors swept daily, with a deep clean and sterilization of the entire dispensary occurring at least once monthly. Points of ingress or egress will be kept securely closed to limit exposure of pests and airborne pathogens within the dispensary. Open points of access not only allow for pest or pathogen contamination, but also pose a security risk. Cannabis and derivative products will be kept in closed, secure containers within secure

storage or the sales floor, mitigating open exposure which may attract pests or allow for contamination.

Employees will adhere to strict sanitary procedures and personal hygienic practices, including cleaning their shoes upon entering the dispensary, which helps prevent the transfer of pests or debris. Waste or open and exposed food will be contained to designated areas with a conscious effort by employees to restrict the introduction of pests or pathogen development. Open food and liquid containers will be prohibited in areas outside of the designated break room. Cabinets, refrigerators, and microwaves will be cleaned weekly to prevent against food spoilage or pest attraction to exposed food and food waste. Food waste and other debris will be collected at the end of each day and locked in waste disposal bins away from product storage or display areas. Waste in the distinguished bins will be removed often to deter settlement of pests, pathogens, or odor. To accommodate and sustain operational efficacy, the plumbing and electrical systems will comply with state and local regulations, and be maintained in proper working order.

### ***Securing the Premise***



### ***Consumption***

The presence of the dispensary in Benicia will be thoughtfully incorporated into the surrounding community. Applicant will ensure complete adherence to all state and City of Benicia regulations governing appropriate and acceptable business operations and employee conduct. Alcohol and tobacco products will not be sold at the dispensary, and patrons will be prohibited from consuming food, alcohol, or tobacco while on site, pursuant to code.

Additionally, consumption of cannabis or cannabis-derived products will be explicitly prohibited on site. Applicant will ensure the following language is legible and posted in multiple, conspicuous locations throughout the premise:

**“SMOKING, INGESTING, OR CONSUMING CANNABIS ON THIS PROPERTY OR WITHIN 100 FEET OF THE BUSINESS IS PROHIBITED.”**

*Records and Inventory*

The posted language and enforceable conduct will maintain a safe and secure facility while ensuring full compliance with regulations.



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## **Odor Abatement Plan**



For Property Located at:  
**1401 E. 5th Street**  
**Benicia, CA 94510**

Prepared on:

**August 16, 2018**

Prepared by:

***Wood Environmental Services***  
Santa Barbara, California



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**Appendices:**

Appendix A: Titan 1000/4000 Hydroxyl Generator Manufacturer Specifications

## **1.0 EXECUTIVE SUMMARY**

Wood Environmental Services (WES) has been procured to develop an odor abatement plan for a cannabis retail facility for a property located at 1401 E. 5th Street in Benicia, California. Chris Hester requested the Odor Abatement Plan to address the requirements of the City of Benicia Retail Cannabis Permit Application Odor Abatement Requirements.

### **1.1 INTRODUCTION**

To counteract the distinguishable smell of the cannabis plant, air quality control technology can be utilized within the facility to mitigate the smell and to address nuisance regulations. The Solano County Air Pollution Control District Nuisance Rule described below:

**NUISANCE.** A person shall not discharge from any source whatsoever such quantities of air contaminants or other material in violation of Section 41700 of the Health and Safety Code which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety or any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

There are two known established industry standard odor mitigation methods in use that include 1) Activated Charcoal Filtration and 2) Deodorizing Technology. Ozone air purification methods have been banned by the State of California due to the health & safety issues associated with ozone in air.

In the activated charcoal filtration method the charcoal acts as an adsorbent whereby the odors and volatile organic compounds (VOC's) become entrained in the pores of the charcoal filter. When the pores of the charcoal become saturated, the charcoal is no longer activated and requires disposal (sometimes as a hazardous waste) and replacement. The deodorizing method utilizes ultra violet (UV) rays to create free radicals that convert organic and inorganic gases and air pollutants into carbon dioxide and water and requires minimal maintenance.

## **2.0 ODOR ABATEMENT TECHNOLOGY**

### **2.1 AIR CONTAMINANTS**

Air contaminants of concern include the distinguishable smell of the cannabis plant and potential industrial solvents in cannabis products that are byproducts of manufacturing or unintentionally present in trace amounts that may include the following VOC chemicals: 1,2-Dichloroethane; Ethyl ether; Pentane; Acetone; Ethylene oxide; Petroleum ether; Acetonitrile; Heptane; Propane; Butane; Isopropyl alcohol; Chloroform; Methanol; Total xylenes; Ethanol; Methylene chloride; Ethyl acetate; and Naphtha. The abatement control technology would require mitigation of both odors from the cannabis and the trace amounts of potential VOC air contaminants.

### **2.2 DEODORIZING HYDROXYL GENERATORS**

To eliminate the maintenance, disposal and replacement cost of changing out charcoal filters/canisters, WES recommends utilization of a deodorizing Hydroxyl Generator that requires minimal maintenance and can "scrub" up to 40,000 cubic feet of air. In addition to the generator a fan and humidifier are required for optimal effectiveness.

Hydroxyl generators emit UV rays from a photo-catalytic lamp to trap titanium dioxide that will react with water and oxygen. Free electrons are produced and hydroxyl radicals become

dispersed by a fan to convert organic and inorganic gases and air pollutants into innocuous carbon dioxide and water. The recommended Titan 1000 (100 cubic feet per minute cfm) or Titan 4000 (3,000 cfm) Hydroxyl Generator technology is specifically designed to mitigate odors and chemicals. For more information, the manufacturer specifications can be referenced in Appendix A of this document.

### **3.0 ODOR ABATEMENT PLAN**

#### **3.1 AIR FLOW REQUIREMENTS**

The Titan 1000 is rated at 100 cubic feet per minute (cfm) and designed to purify 10,000 cubic feet of air space and the Titan 4000 is rated at 3000 cfm and designed to purify 40,000 cubic feet of air. For the purposes of the odor abatement plan, the source of the air contaminants will be located in the sales room and the safe room only. Reference the associated architectural floor plans to determine the size and number of machines needed per room.

#### **3.2 ODOR ABATEMENT PLAN**

The step by step process for odor mitigation is as follows:

- Place the Titan 1000 or 4000 Hydroxyl Generator closest to the main source of the air contaminants and at least 6 inches from walls or any other structure that can block air intake;
- Perform the required maintenance on the generator's electrostatic filter every 3 to 4 months (depending on use or as needed when odors become detectable) per the manufacturer specifications in Appendix A on page 9 as follows: wash the electrostatic filter located on the back of the unit with soap and water for maximum efficiency.
- The photo catalytic lamps are self-cleaning and should be replaced every 8,000 hours of use.

If nuisance complaints are received or odors continue to be detectable, the following recommendations can be implemented:

- If the specified generator is not meeting the requirements for the room size, a "Hydroxyl Maximizer" can be purchased that increases the efficiency of the generator up to 2-3 times by introducing water vapor to provide more hydrogen compounds for the chemical reaction.
- Odoricide Fresh Scent 210 Concentrate or Fresh Scent IQA Gel sanitizers can be used at the end of each day to wipe horizontal surfaces;
- Place blow down air fans at the entry/exit door to contain odors;
- Use in generators in conjunction with the HVAC fan system.

If you have any questions regarding the report or the procedures, feel free to call me at (805) 563-0100.

Sincerely,

*Judy Wood*

Judy H. Wood, Environmental Scientist, CAC, LRCIA, NRPP-RMP, CMI, CEA

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**LIMITATIONS STATEMENT:**

The data compiled and evaluated in connection with this Odor Abatement Plan was limited to information provided by the client for the subject property and believed by Wood Environmental Services (WES) to be representative of areas most likely to be contaminated or areas exhibiting external evidence of possible contamination and such limited data may not disclose all conditions at the subject property or be representative of the subject property.

All data collected by WES has been collected solely for the purpose of preparing an Odor Abatement Plan and may not be used by any other entity for any other purpose. While recommendations are made herein regarding certain mitigation measures that the client may consider, these recommendations are presented in order to provide the client with an order of magnitude estimate of the likely cost of such mitigation in order to assist such client with economic decisions in connection with the subject property, and such recommendations are subject to the same limitations as set forth above, that is, that the sampling techniques utilized in the collection of data for this assessment are limited and not intended to comprehensively reflect all possible contamination at the subject property.

WES is not responsible for mitigation services that are not performed under the advisement and auspices of WES and a professional, licensed and insured, up to a minimum of one million dollars with contamination mitigation insurance and does not guarantee that contaminants have been removed unless WES performs testing following mitigation services. This mitigation plan is effective for the time of the plan submittal and may not represent additional conditions that may have occurred since the date of submittal.

Other than the client to whom this assessment is addressed, this indoor air quality assessment may not be utilized or relied upon by any third party without the express written consent of WES.

APPENDIX A  
TITAN 1000/4000 MANUFACTURER SPECIFICATIONS



## **OWNER'S GUIDE**

# **Titan 1000 & 4000**

*International Ozone Technologies Group, Inc.*  
Lantana, Florida USA  
2007

*"Manufactures Of Environmental Products That Solve Problems"*

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Disclaimer: International Ozone Technologies Group, Inc. Shall not be liable for technical or editorial errors or omissions contained herein; nor for incidental or consequential damages resulting from furnishing this material, or the performance or use of this product.

In the interest of continuing product improvement, International Ozone Technologies Group, Inc. reserves the right to change product specifications without notice. Information in this document may change without notice.

### For Your Records

The serial number for this product is located on the back right bottom of the case. Write the model number, serial number and the original date of purchase in the spaces below for future reference for warranty or insurance purposes.

Product Name: Titan Photo Catalytic Oxidizer  
 Model Number: \_\_\_\_\_  
 Serial Number: \_\_\_\_\_  
 Purchase Date: \_\_\_\_\_

### Glossary

Bacteria	Disease causing microscopic organism.
BOD	Biological Oxygen Demand
CFM	Cubic Feet Per Minute
COD	Chemical Oxygen Demand
Corona	Arcing halo around an electrical discharge.
EPA	Environmental Protection Agency
Fungus	A plant without leaves, flowers or roots. Example = mushroom.
Germ	Disease causing microbe.
Half-life	The time it takes for half the atoms in a substance to decay.
Mildew	A type of destructive fungus that grows in moist environments.
Milligrams Per Hour	Amount of ozone produced, and measured by weight, by a given ozone generator under certain conditions.
Mold	A fungoid growth caused by dampness.
OSHA	Occupational Safety & Health Administration.
Oxidize	To transform a substance by changing its chemical structure. Fire and rust are forms of oxidation.
Ozone	A triatomic form of oxygen with a pungent odor.
PPM	Parts per million. One shot glass in a ten thousand gallon tanker truck is an example of one part per million.
RMA Number	Returned Merchandise Authorization Number
Virus	Disease causing sub-microscopic organisms.
VOC	Volatile organic compound.



WITH BUSINESS RELATIONSHIPS, OR OTHER COMMERCIAL LOSS, EVEN IF ADVISED OF THE POSSIBILITY OF SUCH DAMAGES

- 2 ANY OTHER DAMAGES, WHETHER INCIDENTAL, CONSEQUENTIAL OR OTHERWISE.
- 3 ANY CLAIM AGAINST THE CUSTOMER BY ANY OTHER PARTY.

**Effect of state law:**

This warranty gives you specific legal rights, and you may also have other rights which vary from state to state. Some states do not allow limitations on implied warranties and/or do not allow the exclusion of incidental or consequential damages, so the above limitations and exclusions may not apply to you.

**Sales outside the U.S.A.:**

For Titan products sold outside of the U.S.A., contact your Titan dealer for warranty information and service.



**Model #1000 & #4000  
TiO<sub>2</sub> Photo Catalytic Oxidizer**

**OPERATIONS MANUAL**



**International Ozone Technologies Group, Inc.**

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## LIMITED WARRANTY Titan Catalytic Oxidizers

### What the warranty covers:

**International Ozone Technologies Group, Inc.** warrants its products to be free from defects in material and workmanship during the warranty period. If a product proves to be defective in material or workmanship during the warranty period, **International Ozone Technologies Group, Inc.** will, at its sole option, repair or replace the product with a like product. Replacement product or parts may include remanufactured or refurbished parts or components.

### How long the warranty is effective:

The **Titan Catalytic Oxidizer** is warranted for one (1) years for all parts and one (1) year for all labor from the date of the first consumer purchase.

### Who the warranty protects:

This warranty is valid only for the first consumer purchaser.

### What the warranty does not cover:

1. Any product on which the serial number has been defaced, modified or removed.
2. Damage, deterioration or malfunction resulting from:
  - a. Accident, misuse, neglect, fire, water, lightning, or other acts of nature, unauthorized product modification, or failure to follow instructions supplied with the product.
  - b. Repair or attempted repair by anyone not authorized by **International Ozone Technologies Group, Inc.**
  - c. Any damage of the product due to shipment.
  - d. Removal or installation of the product.
  - e. Causes external to the product, such as electric power fluctuations or failure.
  - f. Use of supplies, or parts not meeting **International Ozone Technologies Group, Inc.** specifications.
  - g. Normal wear and tear.
  - h. Any other cause which does not relate to a product defect.
  - i. Shipping & Handling to or from **International Ozone Technologies Group, Inc.**

3. Removal, installation, and set-up service charges.

### How to get service:

1. For information on obtaining warranty service, call **International Ozone Technologies Group, Inc.** The customer support telephone numbers are: U.S. and Canada 1-877-406-9663. Internet address <http://www.internationalozone.com>
2. To obtain warranty service, you will be required to provide (a) the original dated sales slip, (b) your name, (c) your address, (d) a description of the problem, and (a) the serial number of the product. Obtain a **RMAR** (Returned Merchandise Authorization) from **International Ozone Technologies Group, Inc.**
3. Take or ship the product prepaid in the original container to **International Ozone Technologies Group, Inc.** at 860-6 N. 8th. Street, Lantana, Florida 33462.

### Limitation of implied warranties:

THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, WHICH EXTEND BEYOND THE DESCRIPTION CONTAINED HEREIN INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

### Exclusion of damages:

**International Ozone Technologies Group, Inc.**'s LIABILITY IS LIMITED TO THE COST OF REPAIR OR REPLACEMENT OF THE PRODUCT. **International Ozone Technologies Group, Inc.** SHALL NOT BE LIABLE FOR:

1. DAMAGE TO OTHER PROPERTY CAUSED BY ANY DEFECTS IN THE PRODUCT, DAMAGES BASED UPON INCONVENIENCE, LOSS OF USE OF THE PRODUCT, LOSS OF TIME, LOSS OF PROFITS, LOSS OF BUSINESS OPPORTUNITY, LOSS OF GOODWILL, INTERFERENCE

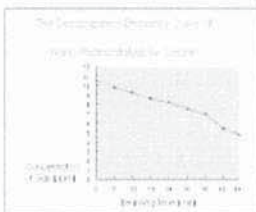
## Titan Testing

This testing was done on a model that is equal to the Titan #1000

Test on Organic Vapor Reduction Effectiveness of Air Purification Technology  
Tested Model: Air Cleaner

Test Substance	Concentration of Input Gas	Concentration After	Reduction Concentration (%)	Concentration After 30 min	Efficiency (%)
3ZW	CH <sub>2</sub> ClCOCl <sub>2</sub>	48	10.56	4.75	54.92

- The sample is tested against a 100% reduction against a control of 100%
- The 100% reduction is achieved by 100% of the sample tested in the test chamber. The 100% reduction is achieved by 100% of the sample tested in the test chamber.
- The test is performed in a laboratory setting. The test is performed in a laboratory setting.



International Ozone Technologies Group, Inc along with many of its dealers have tested *Titan* on many odors such as cigarette smoke, dead body odor, urine odor, garbage odor, and airborne VOCs. Just to name a few and have come out "Smelling Like A Rose" every time.

## Important Safeguards

- ▶ Do not operate equipment before reading and familiarizing yourself with all instructions, procedures, cautions and warnings contained in this manual.
- ▶ Save these instructions for later reference
- ▶ Follow all warnings and cautions marked on the product and contained herein.
- ▶ Do not use this product near water or in a moist environment.
- ▶ Operate equipment only with the correct electrical power specified on the backside of the case.
- ▶ Do not attempt to service this product yourself as opening or removing the enclosure may expose you to dangerous voltage or other hazards.
- ▶ Do not put foreign objects inside the equipment.
- ▶ Do not operate equipment with a damaged cord or plug, if fans fail to rotate, after the equipment malfunctions or if it has been dropped or damaged in any manner. Return equipment to manufacturer for examination, electrical or mechanical adjustment or repair. (See warranty for information.)
- ▶ Do not block air flow through equipment. Set equipment at least 6 inches from walls or any structure that could block the air intake.
- ▶ Do not use equipment in a flammable or explosive atmosphere.

**Caution:**

As with all electrical devices this equipment should not be operated in a wet or damp environment.

This equipment should only be operated using a properly grounded electrical outlet.

International Ozone Technologies Group, Inc. assumes no liability for damages or injuries incurred by misuse of this equipment.

# **Titan #4000**

**Is it an Air Purifier  
That Scrubs The  
Air  
Or  
An Air Scrubber  
That Purifies The  
Air?**



Theory of Operation

UV Rays in the 365 nanometer wavelength, which are safe to look at and let shine on your skin, are emitted from Titan's TiO<sub>2</sub> Photo Catalytic Lamp and pass through the TiO<sub>2</sub> Anatase Coated Glass Sleeve, which is designed to hold the maximum amount of Titanium Dioxide. As a result, electron hole pairs are formed that react with H<sub>2</sub>O and O<sub>2</sub> in the air and produce free electrons and hydroxyl radicals that when dispersed by the fan will decompose organic and inorganic gases and air pollutants into carbon dioxide and water.

Humidity is not a factor when using your Titan. In fact, Titan will produce larger amounts of its purifying agents when used in high humidity situations.

Titan is safe to use at any time with or without people or animals in the treatment area.

Washable  
Foam Filter

**Model #1000**



100 CFM  
Ball Bearing Fan  
&  
1 - 8" Diameter  
High Output  
TiO<sub>2</sub> Photo Catalytic  
Lamp

Front Mounted  
On/Off Switch



1 - 3000 CFM  
Ball Bearing Fan  
&  
4 - 8" Diameter  
High Output  
TiO<sub>2</sub> Photo Catalytic  
Lamps

**Model #4000**

20" x 20" x 2"  
Permanent  
Washable  
Electrostatic Filter  
94% Arrestance



Resettable  
Circuit Breaker



**General Use Guidelines**

Determine the source of the odor and remove any odor causing substance that can be found.

Determine the size of the area that will be purified or deodorized. Multiply the width by the length by the height to determine the total cubic feet of the area.

The following suggestions are general. The actual time it will take to remove an odor or to purify an area depends on many variables such as pollutant load, temperature, humidity, etc.

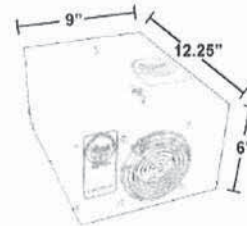
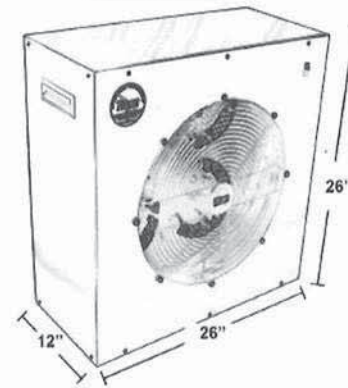
Examples for 1000 cubic feet (100 Square feet with 10 foot ceilings) with lite to moderate odor:

Titan #1000 = 3 to 4 Hours

Titan #4000 = 1 Hour

As stated above, these are just general guidelines. In some cases you will have to go longer and in other cases you will go shorter. Once you have become experienced with using your Titan for odor removal you will be able to determine the treatment times from your past experiences.

Set your Titan anywhere in the area to be treated and turn it on.

**Dimensions****#1000****#4000**

Model	#1000	#4000
Size	12 1/4" x 9" x 6"	26" x 26" x 12"
Weight	8 lbs.	38.5 lbs.
Process	Titanium Dioxide Based Photo Catalytic Oxidation	Titanium Dioxide Based Photo Catalytic Oxidation
Filtration	4" Washable Foam Filter	20" x 20" x 2" Permanent Washable Electrostatic Filter 94% Arrestance
Air Movement	100 CFM	3,000 CFM
Max. Treatment Area	10,000 Cu. Ft.	40,000 Cu. Ft.
Volts / Amps	110 / 1	110 / 4
Hertz	50 / 60	50 / 60
Case Material	Anodized Aluminum .060 / 14 Gauge	Anodized Aluminum .060 / 14 Gauge
Finish	Industrial Powder Coat	Industrial Powder Coat
Warranty	One Year Parts & Labor	One Year Parts & Labor

Adult Day Care Centers & Nursing Homes  
 Air Conditioning Contractors  
 Apartment Complexes  
 Auto Dealerships  
 Auto Detailers  
 Automobile Rentals  
 Beauty Parlors & Nail Salons  
 Bowling Alleys  
 Bus Lines  
 Business Opportunity  
 Businesses  
 Carpet Cleaners & Installers  
 Chemical Supply  
 Child Care Centers  
 Cocktail Lounges & Bars  
 Condominium Associations  
 Country / Golf Clubs  
 Cruise Ships  
 Doctors, Dentist & Chiropractors and Medical Clinics  
 Dry Cleaners  
 Duct Cleaning Companies  
 Equipment Rental Companies  
 Fire & Water Damage Restoration  
 Florists  
 Funeral Homes  
 Garbage/Dumpsters Rooms  
 Grocery Stores, Meat Markets and Fish & Seafood Markets  
 Health Clubs & Gyms  
 Home Owners  
 Hotels  
 Insurance Companies  
 Janitorial Companies  
 Janitorial Supply  
 Karate Studios  
 Limousine Services  
 Marinas / Boats  
 Motorhome / Recreational Vehicle Rentals  
 Movie Theaters  
 Painting Contractors  
 Pest Control Companies  
 Police Departments  
 Pool Supply Companies  
 Print Shops  
 Public Rest Rooms  
 Realtors  
 Restaurants  
 Schools  
 Sick Building Syndrome  
 Trucking Companies  
 Vegetable & Fruit Preservation  
 Warehouse / Storage Facilities

**Trouble Shooting**

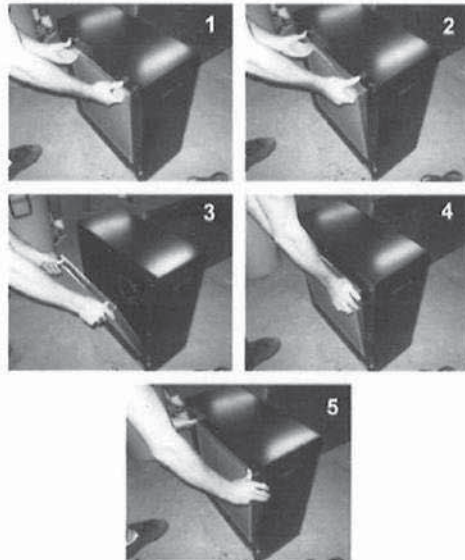
<i>Problem</i>	<i>Possible Cause</i>	<i>Remedy</i>
Unit does not turn on	Power Cord Not Plugged In	Plug Power Cord Into Suitable Outlet With Correct Voltage
	Circuit Breaker In Building Tripped	Reset Circuit Breaker At Panel Box
	Faulty Power Outlet	Try Another Outlet
Unit Keeps Tripping Circuit Breaker	Fuse or Circuit Breaker is Blown On back Of Unit	Replace Fuse Or Reset Circuit Breaker
	Electrical Short Circuit	Return Unit To Manufacturer For repair

**Maintenance**

Your *Titan Photo Catalytic Oxidizer* was engineered, designed and built to require very little maintenance. The only maintenance necessary to keep your *Titan* running at peak performance is to wash the electrostatic filter located on the back of the unit with soap and water, air dry, then re-install. If you ever feel that your *Titan* is not working as well as it did when it was new, call the factory for an RMA number and ship the unit back. We will inspect and diagnose the problem. If the equipment only needs adjustments or cleaning to bring it back into specifications we will gladly service and re-certify your equipment *free of charge*, you only pay shipping and handling. *Titan's Photo Catalytic Lamps* are self-cleaning and will perform at their optimum for a period of 8000 hours (24 Hours Per Day - 7 Days A Week - For 1 Year) at which time they may need to be replaced.

**Removing & Re-Installing Filter**

(#1) Slide fingers under frame of the filter. (#2) Using your thumb to push against the case, pull the corner of the filter free and remove from case.  
 (#3) Place the bottom of the filter into the bottom and completely to the back of the opening.  
 (#4) Using the palms of your hands push down on the filter as you push it into the opening.  
 (#5) Grab the outside of the case with your fingers and use your thumbs to push the corners of the filter to seat the filter completely into the opening. Repeat #5 on the bottom corners of filter.



























urbn leaf

**Urbn Leaf**  
**City of Benicia Commercial Cannabis**  
**Business Application Package - Retail Sales**

*Delivery Services*

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**GG) The applicant's process to ensure driver and patient safety.**

***Introduction***

Applicant will take several measures to ensure driver, patient, customer and community safety. Applicant has evaluated existing delivery companies within the cannabis sector, as well as traditional delivery businesses in non-cannabis environments to learn more about available safety and security measures to protect our team and our customers. The following Driver and Patient Safety Plan is derived from these best practices and has been thoroughly reviewed by all members of the Management Team. Our multi-pronged approach to ensuring safety is as follows:

1. Develop and Implement a Rigid Candidate Screening Program
2. Develop and Implement a Comprehensive Delivery Training Program
3. Select and Maintain Highly Secure Delivery Vehicles
4. Develop and Adhere to Delivery-Specific Standard Operating Procedures

Applicant acknowledges that the safety of our community and our personnel rests on extensive planning and the implementation of preventative measures wherever possible, and has summarized our plans for addressing each of the aforementioned pillars of safety herein. This entire Plan constitutes Applicant's *Delivery Code of Conduct*.

***1. Develop and Implement a Rigid Candidate Screening Program***

Urbn Leaf has developed a rigorous *Pre-Employment Screening Process* to be implemented prior to opening the dispensary and delivery businesses. All employees will undergo extensive background checks in alignment with the rules and regulations surrounding employee screening. Interested candidates will participate in a five (5) step interview and evaluation process, advancing to the next step if each of the minimum requirements and prerequisites for the position are met by the candidate. All delivery personnel employed by our Company will be at least 21 (twenty-one) years of age, in accordance with municipal codes and will have a valid California driver's license. Delivery personnel will be subjected to additional screening prior to hiring and additional training post-hiring, including but not limited to: comprehensive background check; a clean driving record; and ability to operate a motor vehicle in all lighting conditions. The five steps of candidate evaluation are as follows:

1. Submission of resume and completion of Applicant's formal employment application
2. Initial Phone Screen
3. In-Person Interview with Director of Operations
4. Review of References and Driving History
5. Passing of Background Check

*Step 1: Submission of Resume and Completion of Application*

## *Delivery Services*

Candidates will begin the application process by submitting their resumes and by completing the Urbn Leaf employment application, to be added to Urbn Leaf's website. Once submitted, applications will be reviewed by the Director of Operations. If a candidate meets the basic qualifications for the position, the Director of Operations will contact the applicant to schedule and consequently conduct a phone interview.

### *Step 2: Initial Phone Screen*

Candidates who successfully pass through the resume review and application submission process will be invited to participate in a phone screen. The phone screen will be utilized to evaluate the candidate's level of professionalism, assess the candidate's experience and interest level, and to determine if the candidate would be a good cultural fit for Urbn Leaf. Candidates who both demonstrate serious interest and effectively answer phone screen questions will advance to the in person interview round.

### *Step 3: In-Person Interview*

If the candidate passes the phone screening, the Director of Operations will conduct an off-property in-person interview with the candidate. During the in-person interview, the candidate will be asked questions pertaining to his/her relevant work experience(s) and behavioral questions to assess how the candidate would handle a variety of situations pertaining to the role.

### *Step 4: Reference Check and Driving History*

Pending a successful in-person interview, a member of Management will contact no less than three (3) references, supplied by the candidate and will conduct a driving history review to ensure that the candidate has a clean driving record, free of violations that would prohibit the candidate from safely transporting cannabis during the delivery process. If the feedback from references is positive, the candidate will be issued a written offer letter, pending the successful completion of a background check, as required by the City and County of Benicia and the State of California.

### *Step 5: Background Check*

Candidates will, as a final screening step, complete a background check. The background check process is prescribed by the State of California and will require all candidates to meet the minimum criteria set forth by the program. If a candidate fails to provide all required application materials, or fails to meet the background check requirements set forth, the candidate's application for employment will be denied.

Once hired, all delivery drivers and personnel will participate in a mandatory ninety (90) day probationary period beginning on the individual's start date. While working in the probationary period, employees will have limited facility access and limited information access. Access limitations will not interfere with the employee's ability to perform the functions of his/her role within the Company. While we anticipate our screening process to uncover any concerns pertaining to a new hire, we are confident that this probationary period will offer additional protection for our Company

and our patrons. Pursuant to 20.44.170(G)(2), all employees who deliver cannabis shall have valid identification and a copy of the dispensary's Commercial Cannabis Business Permit at all times while making deliveries.

## ***2. Develop and Implement a Comprehensive Delivery Training Program***

In addition to all mandatory company-wide trainings, Delivery Drivers must participate in a two-week classroom and hands-on training, facilitated by the Director of Operations and Security Director, which covers all security measures, protocols, equipment and safety related procedures necessary for the individual to fulfill his/her job duties as a Delivery Driver. Candidates for employment will be provisionally hired with the understanding that the individual must participate in training and pass the Delivery Driver Assessment issued on the final day of training. Employees will need to pass the assessment with a score of 90% or higher before being able to start work as a Delivery Driver. Should an employee score below a 90% more than two (2) times, the individual may not be eligible for employment, at the discretion of the Security Director. This Assessment is comprised of a written examination as well as a hands-on assessment where the individual will respond to a series of scenarios and explain to the Security Director his/her response to the scenario, in accordance with Urbn Leaf's procedures. Training will be held for newly added team members on a rolling basis as new employees are hired.

## ***3. Select and Maintain Highly Secure Delivery Vehicles***

Applicant will select and utilize commercial type cargo vans as secure delivery vehicles. Each vehicle will be of plain color with no reference markings to indicate the transportation of cannabis including, but not limited to: any sign, logo, illustration or identifying factor related to cannabis production, cannabis products or Urbn Leaf itself. At no time will any medical cannabis product stored inside a Urbn Leaf delivery vehicle be visible from the outside. The delivery vehicle will be climate controlled in both the passenger compartment and the cargo area and will also be equipped with a GPS monitoring system. The cargo areas may only be accessed by designated Delivery Drivers, members of the Management Team, and members of the Security Team. Any vehicle used for the purposes of delivering cannabis products will have a copy of the current California Department of Transportation registration and required inspection certificates kept inside the vehicle. All vehicles will be equipped with FasTrak to limit the amount of time vehicles would need to slow down while passing through toll roads. Current State inspection and registration stickers will be displayed in the appropriate location on each vehicle. Delivery vehicles will be maintained with meticulous detail in accordance with the vehicle's handbook. Delivery personnel, as well as members of the Management and Security teams, will be trained to regularly inspect the delivery vehicle prior to usage.

The following technologies and systems will be utilized within the delivery vehicles to facilitate greater levels of safety, security, communication with Delivery Drivers and overall traceability of the vehicle itself:



<p><b>Communi- cation</b></p>	<p>enables the Delivery Drivers to contact personnel at either the dispensary or the receiving qualified purchaser, as well as law enforcement by dialing 9-1-1.</p>
-----------------------------------	--

Finally, delivery vehicles will carry a valid insurance card within the Transportation Binder as mandated by California law, pursuant to 20.44.170(G)(3) which requires all delivery businesses to be insured with proof of insurance at a minimum amount of \$1,000,000.00 for all vehicles being used to transport cannabis goods. Applicant acknowledges that the business must maintain a comprehensive general liability combined single occurrence insurance policy issued by an "A" rated insurance carrier in an amount no less than two million dollars and naming the City of Benicia as additional insured, pursuant to municipal code. Electronic copies of the delivery vehicle's registration documents will be stored at Urbn Leaf's facilities. D

**4. Develop and Adhere to Delivery-Specific Standard Operating Procedures**

Applicant has developed comprehensive Standard Operating Procedures (SOPs), outlining driving considerations; route assessment and route planning; state laws and Program rules and regulations; safe driving processes and reporting. The following processes pertain to all cannabis deliveries:

1. **Inspect the Vehicle:** Prior to each delivery, the vehicle will be inspected by the Delivery Driver (DD). During the inspection, the DD will inspect tire pressure, dashboard lights, all locking mechanisms, fuel level, cleanliness, windshield wiper fluid levels and functionality of windshield wipers, headlights, brake lights, and turn signal lights, security communication devices, GPS and tracking devices. The Driver will also ensure there are no unauthorized tracking devices, explosives or other weapons. The Driver will verify the vehicle's insurance and inspection sticker are current and valid. If needed, the Driver will communicate vehicle concerns to management or will seek out mechanical assistance for concerns that can be corrected prior to departure. Under no circumstances will Applicant permit vehicle usage for the transportation of medical cannabis if the vehicle has mechanical needs or any of the aforementioned inspection points do not meet company standards.
2. **Assess Weather Restrictions:** Applicant will restrict deliveries of cannabis in inclement weather conditions. The Security Director will make the final decision as to whether or not weather is too severe for delivery purposes. If a delivery is permitted, headlights are required at all times during inclement weather.
3. **Assess Time of Day and State Line Restrictions:** The delivery of cannabis will occur between the hours of 10:00 AM and 9:00 PM, pursuant to Municipal Code. Deliveries will only be permitted within the State of California. Headlights will be required at dawn, dusk and any time when a distance of five hundred (500) feet

ahead cannot be clearly seen. Pursuant to 20.44.170(G)(6), delivery vehicles shall not leave the State of California while possessing cannabis products.

4. **Plan the Delivery Route within Hours of Operation:** Delivery times and routes will be randomized, and any vehicle delivering cannabis will travel directly to the receiving facility without intervening stops or unnecessary delays. The Security Director will develop and maintain a list of approved routes. Each planned route will also have at least one (1) secondary route to be used in the event of a traffic situation, detour, or other obstruction. If a planned route will require a fuel stop, the stop will be identified ahead of time and built into the planned route and shipping manifest so as to choose a rest area in a safe, accessible area that allows for the least amount of stop time. If a stop is required, Delivery Drivers will be trained to shut off the engine and assess surroundings prior to exiting the vehicle.
5. **Creation of a Manifest:** Every delivery will be accompanied by a manifest, pursuant to code, and as described in greater detail within our response to *Prompt JJ* of this section *Delivery Services*. All information pertaining to the delivery will be entered into the inventory tracking system (ITS), METRC™, and will also be made available to law enforcement agencies upon request. Manifests will be stored in accordance with Applicant's Record Keeping Plan.
6. **Preparing Cannabis for Delivery:** Before cannabis packages are permitted to leave the facility, they will be packaged and inspected and will then receive an accompanying shipping manifest. Applicant will create labels for each shipment of cannabis and will package, and label, in accordance with Bureau rules and Applicant's response to *Section 7- Records and Inventory, Prompt K*. Packages will be prepared for delivery and will be anchored inside of the delivery vehicle. To further reduce the risk of diversion and safety or security breaches that may negatively impact our drivers, the greater Benicia community or the patients and customers we serve, Applicant will ensure that delivery vehicles contain less than the maximum amount of cannabis product allowed by the regulations. Pursuant to 20.44.170(G)(11), the total value of cannabis product contained within a delivery vehicle will not exceed \$3,000.00 at any time.
7. **Inventory Control and Change in Custody:** When the delivery vehicle and Delivery Drivers are ready to depart post vehicle inspection, the previously prepared shipment containers will be brought to the secure loading and unloading area. The containers will be transferred into the delivery vehicle by the Delivery Driver. Once verified and recorded in the METRC™, a copy of the shipping manifest will be placed in the tamper proof container and placed in the Transportation Binder. Upon arrival, employees representing the licensed receiving entity will confirm that the container identification number matches the identification number on the shipping manifest. The employee will visually inspect



each airtight package and confirm that the package's identification number matches the identification number on the shipping manifest. Contents delivered will be inventoried and verified against the log to ensure there was no tampering or loss during transfer. □ The employee will then mark the product as received within METRC™, effectively indicating that the products have transferred custody from the initiating licensee to the receiving licensee. If there is an inventory error, discrepancy or loss that cannot be rectified, the error will immediately be reported to the Bureau.

8. **Reporting Emergencies or Suspected Theft or Diversion:** In the event of an emergency, the Delivery Driver will immediately report the threat or emergency to a member of California's law enforcement through the 911 emergency system and to the sending and receiving cannabis entities. The Delivery Driver will also report vehicle accidents, diversions, losses, or other reportable events that occur during transport of cannabis to the Security Director within one hour of the accident or incident. Applicant will report any loss or theft of cannabis in a manner described by the Bureau and within METRC™. The Security Director will be responsible for continuing to notify the Bureau as additional information becomes available, as well as the appropriate law enforcement parties. If a discrepancy is suspected due to criminal activity by an employee, the Security Director will report the employee to the Director of Operations to take appropriate action, which includes notifying the Bureau and the appropriate law enforcement agency if applicable. Any discrepancy between the physical cannabis in a shipment and the shipping manifest will be documented, reported to the Bureau and followed by an internal investigation conducted by the Security Director. If the discrepancy requires modification to existing SOP's, Applicant will revise the procedure, making sure it is checked against existing procedures for anomalies, duplications, conflicts, and ensuring that it adheres to current regulatory requirements. The updated SOP will be reviewed by the Security Director, and, once approved, the procedure will be implemented. Staff will be re-trained with respect to the modified procedures.
9. **Responding to In-Transit Emergencies or Threats:** In the event of attempted robbery or other threatening events during delivery, the Delivery Driver will be trained to respond with and without force, depending on the situation. All Delivery Drivers will participate in extensive training covering the best method for evaluating threatening situations; determining the most appropriate response and corresponding level of force, if applicable; and how to maneuver away from the threatening event if possible.
10. **Cooperating with Authorities:** Applicant understands that delivery vehicles may be stopped and inspected along delivery routes or at any facility by the Bureau, law enforcement or other federal, state or local government officials if necessary to perform the government officials' functions and duties. During any such inspection, Delivery Drivers will cooperate with the official to ensure a smooth,

efficient and secure inspection.

### **Summary**

Applicant will develop a Code of Conduct for all delivery drivers, as well as the licensed cannabis businesses we intend to serve. Pursuant to codes and regulations, the delivery company will also provide a flyer, in a format provided by the City of Benicia, articulating the 'Prohibited Conduct Involving Marijuana and Marijuana Products,' included within the Health and Safety Code Section 11362.3. Delivery drivers will only deliver cannabis in aggregated amounts as ordered by the customer and will ensure strict compliance with State delivery limits, with regard to the amount of cannabis and cannabis products that can be delivered on the same occasion, pursuant to 20.44.170(G)(8).

### **HH) The applicant's process to verify delivery is to a qualified purchaser and to a qualified location.**

Pursuant to Municipal code commercial cannabis deliveries may be made only from a commercial cannabis dispensary permitted by the City in compliance with this ordinance, and in compliance with all the State regulations. When an order for cannabis delivery is placed with the Applicant, the Director of Operations will first confirm that the order has been placed by a qualified buyer and that the proposed delivery address is a qualified location. To accomplish this, the Director of Operations will request the following information from the prospect buyer:

#### ***Business to Customer Delivery***

- Name and phone number of the purchaser
- Age of the purchaser (to be verified by an appropriate form of identification upon delivery)
- Address of the physical location to which the delivery will be made

The Director of Operations will then look up the address to ensure that it is a qualified, physical location per regulations set forth by the City of Benicia and State of California. The Delivery Driver will be responsible for confirming that the form of identification used for age verification is valid and accurate.

#### ***Business to Business Delivery***

- Name of the Licensed Business
- Address of the Licensed Business
- License Number Associated with the Business
- Medical or Adult-Use
- Point of Contact Full Name and Employee Identification Number
- Point of Contact Phone Number

The Director of Operations will verify the responses provided by visiting the State's website and searching for the entity name and entity's corresponding license number. The Director of Operations will confirm that the licensed buyer is a licensed entity in the State of California, confirming that the entity may receive both medical cannabis and adult-use cannabis products via delivery.

**II) The applicant's process to track and maintain communication with the delivery person at all times.**

Applicant's Security Director, Chris Hester, will be responsible for communicating with, and tracking, Delivery Drivers and delivery vehicles throughout the delivery process. Deliveries will be made in compliance with State regulations, including use of a vehicle with a dedicated Global Positioning System (GPS) device which will allow for accurate tracking of the vehicle at all times, pursuant to 20.44.170(G)(10). Applicant acknowledges that cell phones and tablets are not sufficient for purposes of tracking the delivery vehicle. Delivery Drivers will have a fully charged cellular phone during deliveries. Delivery Drivers will participate in extensive training to ensure that all drivers understand the rules surrounding cell phone use while operating a delivery vehicle.

The Global Positioning System (GPS) device will be monitored by the Security Director throughout the delivery process and will provide the Security Director the ability to see the vehicle's exact location. By monitoring the device, the Security Director will be able to see if the Delivery driver strays from the planned route, makes stops not articulated within the driving route plan, the vehicle's speed, or if the vehicle is stopped for unexpected lengths of time.

**JJ) The applicant's process to verify deliveries and provide accurate manifests for audit purposes.**

Applicant will utilize METRC™, California's selected Seed-to-Sale system, for the cannabis inventory tracking process. METRC™ is comprised of traceability features that enable the generation of reports and the specific identification and location of cannabis at any point in that lifecycle, and the "tracking-back" of product from the customer or patient to the specific production site and circumstances. METRC™ also maintains a log of reports that are secure and searchable by authorized users of the system. Data may only be modified by users with Administrator access. Any changes to the reports or underlying system data will be recorded within the system with the relevant User ID as well as date and timestamps for all relevant actions. All delivery events and purchase reports will be created for each licensed dispensary or qualified purchaser to which Urbn Leaf delivers cannabis.

Transport shipping manifests track movement of cannabis from the originating site to any licensed recipient or qualified purchaser. Shipping manifests will be generated by METRC™ and will include all of the information required by the regulations, remaining with the Delivery Driver during the entire delivery process, pursuant to 20.44.170(G)(9). Additionally, the Delivery Driver will maintain a delivery

receipt that will be signed and given to the receiving purchaser, with a copy retained for Applicant's records. The receipt will include:

- Name and address of the originating, licensed dispensary (20.44.170(G)(12)(a);
- The name of the employee who delivered the order (20.44.170(G)(12)(b);
- The date and time the delivery request was made (20.44.170(G)(12)(c);
- The complete delivery address (20.44.170(G)(12)(d);
- A detailed description of the cannabis goods requested for delivery including the weight or volume or any accurate measure of the amount of cannabis goods requested (20.44.170(G)(12)(e);
- The total amount paid for the delivery including any fees or taxes (20.44.170(G)(12)(f); and
- At the time of the delivery, the date and time delivery was made, and the signature of the person who received the delivery (20.44.170(G)(12)(g).

Applicant will include the following information on shipping manifests allowing for greater transparency and more detailed records:

- Urbn Leaf's cannabis business license number;
- Recipient's cannabis business license number, if applicable;
- Name and contact information for the receiving business' representative who has knowledge of the transport;
- Driver's name and license number;
- The date and approximate time of departure from Urbn Leaf's facility;
- The proposed route and a secondary route, in the event of a required detour or emergency; and
- The delivery vehicle's make, model and license plate number.

As described previously, Urbn Leaf will only deliver cannabis in aggregate amounts as ordered by the customer and will only make deliveries to licensed cannabis businesses located within the State of California, pursuant to (20.44.170(G)(6). Delivery Drivers will not cross California State lines, even for temporary detours, to complete a delivery and will remain within the State at all times. A cannabis business shall ensure compliance with State delivery limits as they regard the amount of cannabis and cannabis products, pursuant to (20.44.170(G)(8). Urbn Leaf will maintain a list of all deliveries, including the address delivered to, the amount and type of product delivered, and any other information and for the duration of time required by State regulations, pursuant to (20.44.170(G)(7). The delivery lists will be maintained in accordance with Urbn Leaf's record keeping guidelines explained in *Section 3.2 - Records and Inventory, Prompt D*, in both physical and electronic formats. The customer requesting the delivery shall maintain a physical or electronic copy of the delivery request and shall make it available upon request by the licensing authority and law enforcement officers, only as required by State regulations, pursuant to (20.44.170(G)(5).

## Rental Agreement Interim to a Lease Agreement

This Rental agreement entered into on September 1<sup>st</sup>, 2018 between Landlord (Lessor) \_\_\_\_\_ and Tenant (Lessee) Emerald Capital Holdings LLC to serve as a binding agreement interim to the acceptance and signing of a long term lease by both aforementioned parties subsequent to the Tenant (Lessee) Emerald Capital Holdings LLC obtaining City of Benicia required permits to operate their business. Landlord (Lessor) to allow 120 One Hundred and Twenty days, or up until January 15th 2018 for Emerald Capital Holdings LLC to obtain said Permits. Should the Permits be issued by The City of Benicia and be acquired by Emerald Capital Holdings LLC earlier, it is agreed that ten days subsequent to issue and upon signing of the permanent "Lease Agreement", the Landlord (Lessor) allow the Tenant (Lessee) to have full and uninterrupted possession of the premises as covenanted by the terms and conditions of the "Lease Agreement".

1. Premises/Location: Lessor does hereby rent and let unto the Lessee an approximate 5,400 (Five Thousand Four Hundred) square foot part of a building located at East N street, Benicia, California, 94510 and in the County of Contra Costa, for \$2.00 per square foot.

2. Term: The "Term" of this "Interim Rental Agreement" is Four months beginning September 1<sup>st</sup>, 2018. Should the Tenant be unable to obtain the City of Benicia required permits during this "Term" to operate their business Landlord will have the right to extend this "Term" or terminate this "Interim Rental Agreement" at his sole discretion.

3. Rent: Rent shall be in the sum of (\$100.00) One Hundred dollars per month due on the (1<sup>st</sup>) first of each month and considered late if paid after the 5<sup>th</sup> of any given month during the "Term" or "Extended Term" and must be accompanied with a late fee of 5% or (\$5.00) if paid after the 5<sup>th</sup> of any month during the "Term" or "Extended Term" of this agreement. The first month's rent will be due and payable upon the acceptance and signing of this "Interim Rental Agreement". This rent sum shall have no bearing or effect upon the rental sum of the anticipated eventual lease agreement to be accepted and signed by Landlord and Tenant.

4. Possession of Premises: Upon acceptance and signing of this Interim Rental Agreement Landlord (Lessor) agrees to give the Tenant ( Lessee) permission to have uncompromised access to the space to conduct any studies or site visits, but without permission to begin or conduct any alterations, improvements, modifications or the likes to include the non operation of any business and no storing anything during this "Term" until such time as an accepted signed long term lease is in place.

5. Acceptance of Terms and Covenants: By signing this agreement all parties are in acceptance of the terms and covenants set forth herein and agree to uphold all conditions holding one another harmless with no liability outside the terms of this limited contract.





Valerie Ehrke Design  
 306 5th Street  
 P.O. Box 1444  
 Arbutle, CA 95912  
 (530) 681-1218

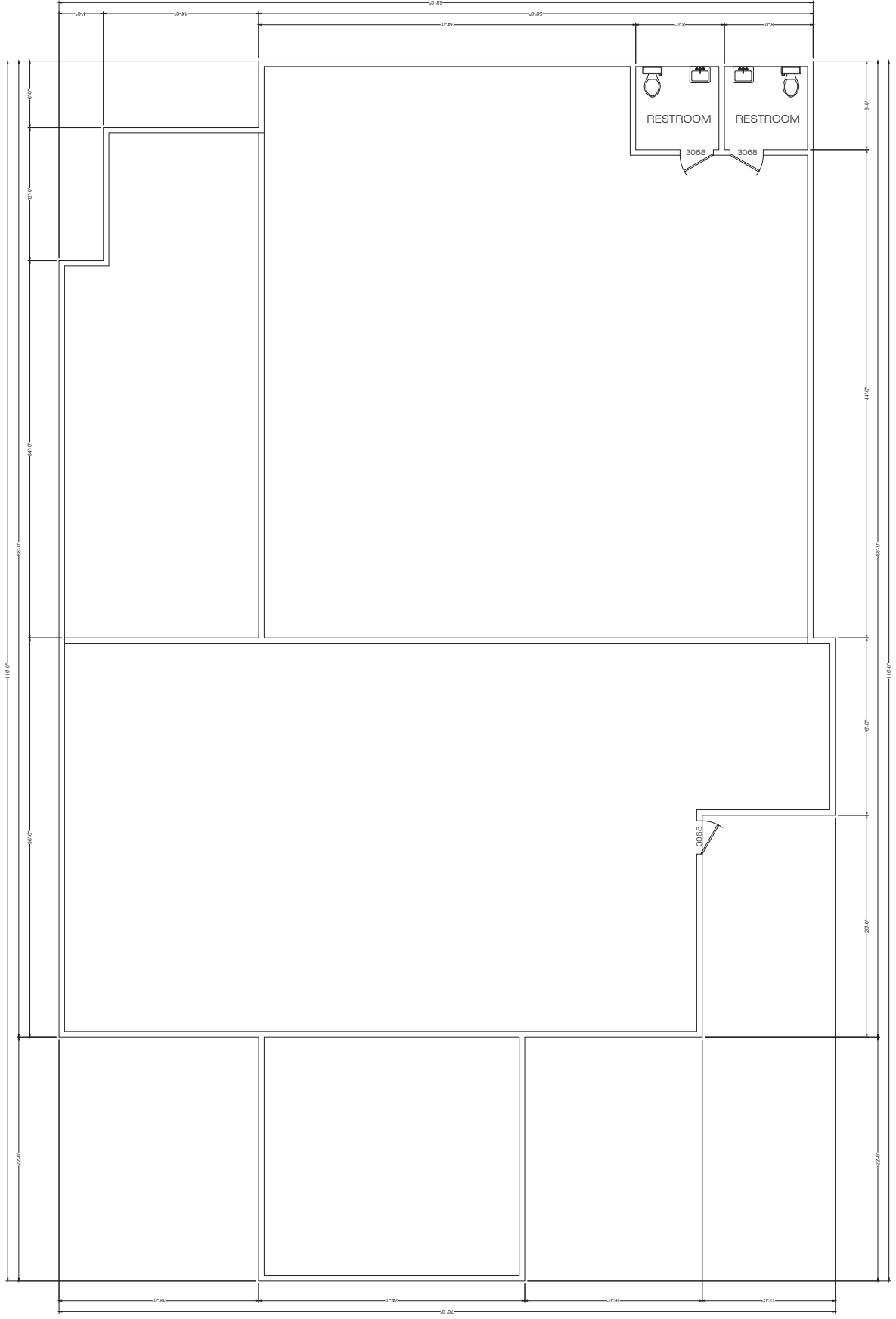
Dispensary  
 1401 East 5th Street  
 Benicia, CA

DATE	DESCRIPTION	DATE	DESCRIPTION

DRAWN BY: VEE  
 DATE: 9-01-18  
 PROJECT NO:  
 SCALE: 1/4" = 1'-0"

SHEET NO  
**A-2.1**

DATE PLOTTED: 9/1/18  
 PLOTTED BY: VEE  
 PLOTTER: HP DesignJet T1100



6188 SQ. FT. EXISTING FOOT PRINT





