



HARVEST

City of Santa Rosa

JUN 21 2018

Planning & Economic  
Development Department

# CITY OF SANTA ROSA

## CANNABIS BUSINESS PERMIT APPLICATION

COMBINED APPLICATION FOR MEDICAL AND ADULT-  
USE DISPENSARY & DELIVERY LICENSES

1015 Santa Rosa Ave

CMP18-068

## TABLE OF CONTENTS

Executive Summary	15
Project Narrative Key Points	16-17
Security Plan	17-46
Odor Mitigation	47-52
Outdoor Lighting Plan	40-42
Noise	53
Parking Analysis	53
Hours of Operation	54-55
Operational Plan	55-56
Delivery and On-site Consumption	56-59
Storefront, Signage & Window Treatments	59-60

## MERIT BASED SECTIONS

Local and State Compliance	60-63
General Plan and Zoning Consistency	63-66
Special Events	67
Employee Register	67-68
Accessory Uses	68-69
Site Management	70-140
Experience in Retail Cannabis in North Bay Area	70-72
Qualifications and Backgrounds of Principals	72-86
Diversity Plan Overview	87
Business Plan	87-158
Positions, Responsibilities, and Qualifications	88-92
Inventory Records and Diversion Protection	93-99
Protected Information	99-104
Cash Management Plan	104-107
Quality Assurance Audits and Inspections	107-109
Track and Trace Compliance	110-113
Ensuring All Cannabis Goods Are Properly Packaged and Labeled	114-117
Practice For Ensuring All Products are Tested	117-121
Recalls	121-126
Transfer/Transport of Cannabis Products	126-133
Delivery Service Overview	134-158
Management Plan	158-165
Premises Maintenance Regarding Trash and Graffiti	158
Secure Facility	158-159
Performance Timeline	160-165
Neighborhood Compatibility Plan	166-191
Clear and Attractive Entrance	166-167
Pedestrian Orientation	168
Bike Parking	168-169

Access to Transit	169-170
Stability and Quality	171-175
Enhanced Retail Experience	176-184
Building and Site Improvements	185
Crime Prevention	186-187
Environmental Impact	187
Community Outreach and Economic Impact	188-191
Trash and Graffiti	191
Neighborhood Enhancement Plan	191-209
Description of Site Improvements	191-192
Integration of Project Through an Attractive Façade	193
Environmentally Friendly Business Practices	193-198
Public Relations and Neighborhood Outreach	199-201
Local Neighborhood Liaison	201
Community Benefits	201-204
Providing Health Benefits And a Living Wage for Employees	204-209

#### ATTACHED DOCUMENTS

Documents for Harvest of Santa Rosa	210-211
Letters from Local Businesses	212-216
Letters of Commitment for Local Charities	217-225
Letters from Santa Rosa Community	226-227
Letters from Other Markets	228-229
Copies of Cannabis Licenses	230

This Cannabis Business Permit Application is submitted for the consideration of the Applicants desire to operate medical and adult-user retail dispensary and delivery licenses in the City of Santa Rosa, California.

The Applicant, Harvest Inc., has extensive retail cannabis experience, operating cannabis dispensaries across nine States in the United States of America. Harvest Inc., are one of the largest commercial cannabis operators in the country and bring a range of systems, processes, tools and procedures to the application and City. Our mission is to be the largest operator of cannabis retail operations in North America and to be the preferred retail provider for patients and customers across North America.

The business at Santa Rosa, if approved, will be fully staffed by a local qualified and trained team, overseen by Harvest Inc., which will guide the business in all aspects of operations, finance, quality control and regulatory compliance and approvals.

The Applicant will operate the business under a new local entity – Harvest of Santa Rosa LLC – from leased premises at 1015 Santa Rosa Ave Suite A, Santa Rosa CA 95404.

Harvest of Santa Rosa are applying for Medical and Adult-Use Cannabis Retail Dispensary and Delivery Licenses, which will operate from premises which are appropriately and compliantly zoned within the City's commercial cannabis zone.

The site will have 24-hour security and be fully compliant with all City and State directives and codes regarding the operations and practices of the cannabis industry. Security for the site will be managed by a State Licensed party security operator. The Applicant aims to build and operate a business that exceeds the needs of its Medical Patients and Adult-Use Customers whilst at the same time delivering needed taxes and revenue to City of Santa Rosa.

Harvest of Santa Rosa will operate, first and foremost, as a local business entity, focused on the needs of its local patients and customers. It will operate under the national umbrella of Harvest Inc., which will provide the backbone to the operations, ensuring that the business operates at all times as a taxed, tested, compliant, legal and licensed entity. Harvest Inc. has a strong track record of supporting the local community wherever it goes – Santa Rosa will be no different. We will provide a dozen new jobs to the City of Santa Rosa, have a policy of 'using local services' wherever possible and will contribute back to the local community health, youth, minority and drug education programs.

This document contains all the plans, processes and practices required by City of Santa Rosa for the application for the Cannabis Business Permit, as directed by City of Santa Rosa's Ordinance.



**LegalNameofEntity:** Harvest of Santa Rosa, LLC

**EntityType:** Limited Liability Corporation – treated as a General Partnership under Californian State Law (articles of incorporation attached).

**OwnersList:** Harvestof Santa Rosa LLC 95%  
Monica Hesz 5%

**Convictions / Infractions:** None

**RetailExperience:** Harvest Inc. operate 28 dispensaries across 7 North American States and are one of the largest commercial cannabis retailers in North America.

**Proposed Business Location:** 1015 Santa Rosa Ave Suite A, Santa Rosa CA 95404

**LocationCompliance:** The Location we have selected complies with overconcentration and setback to schools requirements. The storefront entrance is in a visible location that provides an unobstructed view from the public right-of-way.

**LicenseType:** The Applicant is applying for Medical and Adult-Use Retail Dispensary and Delivery Business Licenses.

This document contains all the plans, processes and practices required by City of Santa Rosa for the application for the Cannabis Business Permit, as directed by City of Santa Rosa's Ordinance.

#### BUILDING AND FIRE CODES

The applicant has prepared the following Fire Protection Plan for review by the City and chief Fire Marshall. The applicant will adhere to all building and fire code requirements required by the city of Santa Rosa for cannabis related occupancies.

Fire Sprinklers shall be located throughout the building. The primary purpose of the Fire Sprinklers are to protect employees, plant and equipment and the building in the event of a fire.

#### Occupancy Classification

The Facility, according to Chapter 3 of the International Building Code (IBC) and International Fire Code (IFC), has a M-Occupancy (202) classification. The Building will have a Hazard Communication Rating of 407.

The Applicant would propose securing Building Construction and Electrical / Mechanical Certifications, prior to any operations being conducted. Automatic Fire Extinguishing / Suppression systems, Fire Alarm and Detection systems, and related equipment would also be installed at the Facility.

### **Hazard Communication**

Containers and/or packages related to hazardous materials shall be properly labelled and warning signage shall be properly displayed and easily visible. Further, all persons working at the Facility shall be trained on what to do in the event of an emergency involving fire on the property.

### **Interior Finishes**

All interior finishes shall be fire-rated according to California Building Code Standards. All installations will be installed according to building and fire code requirements. Interior finishes will comply with flame spread ratings in accordance with Table 803.3 of the IFC

### **Exits and Exit Signage**

The number of exits at the Facility shall be in accordance with Table 1006.2.1 and Table 1006.3.2(2) and Section 1017.2 of the International Fire Code (IFC). Accordingly:

- All exits will be clearly illuminated by EXIT signage on the roof of the Facility – signs will be clearly visible from both directions.
- A Fire Exit Plan shall be printed and appropriately displayed on the walls of the Facility.
- Egress doors will be installed and required to swing in the direction of egress.
- All staff will be briefed on Fire Safety procedures and a Fire Safety Exercise shall be conducted at least twice a year.

### **Security Gates & Egress Doors**

Any security gates installed at the Facility that impact any Fire Exit shall be approved by the City Chief Fire Marshal prior to installation.

A key box shall be installed on the site which shall only be accessible by the General Manager and City Chief Fire Marshal (or any Fire Department officials approved by the Chief Fire Marshal). The Chief Fire Marshal shall also be issued a Key Swipe Card that permits access to Levels 1-5 at the Facility. The Chief Fire Marshal shall only be permitted to use such Swipe Card in the event of an emergency.

## **SECURITY PLAN**

### **Executive Summary**

Our number one priority at Harvest of Santa Rosa LLC ("Harvest") is the safety of the public and our employees. We realize we have a serious responsibility and, like the City of Santa Rosa, a compelling interest in ensuring that cannabis is not distributed in an illicit manner, protecting the public health, safety, and welfare of Santa Rosa's residents and businesses, and preserving the peace and quiet of the neighborhoods in which we operate and providing safe access of cannabis to residents. Our efforts to fulfil these responsibilities begins with our security protocols and continue with inventory and access control, safe dispensing, incident response and proper recordkeeping; which are addressed throughout this plan.

will be instructed to ensure doors providing access to these areas remain closed at all times.

Each morning at opening, the general manager will inspect the HVAC and odor control systems to ensure proper operation. A representative of TEP Engineering will be contracted to conduct a comprehensive inspection once every three months. Filters will be replaced per manufacturer's recommendations or more frequently, as necessary. Records of all inspections and maintenance will be maintained for at least seven years.

Further mitigation strategies will be explored in the unlikely event that carbon filtration is found to be inadequate for odor mitigation.

### Staff Training

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During initial training and weekly staff meetings, dispensary employees will learn that it is everyone's responsibility to ensure cannabis odors do not escape the dispensary structure. Employees will be instructed to immediately report to the general manager any detection of cannabis odor outside of the dispensary and to ensure doors providing access to the secure storage area and dispensary sales floor remain closed at all times. Employees that violate these instructions will be subject to our Progressive Discipline Policy.

### Engineering Controls

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#### **Filtration**

Odors will be mitigated by activated carbon filters and ultraviolet (UV) purifiers integrated into the exhaust, ventilation, and HVAC systems. Activated carbon is charcoal treated with oxygen, which generates pores between the carbon atoms, creating a highly absorbent material that captures odorous, gaseous, and liquid contaminants. As recommended by TEP Engineering, suitable activated carbon filter manufacturers include Camfil, Can-Filters Canada, and Purafil. UV lighting further purifies air by destroying up to 99% of airborne microorganisms such as germs, viruses, bacteria, and fungi.

#### **Air Curtains**

Air curtains installed on exterior doors will create a seamless barrier of air, further preventing odor escape.

#### **Ventilation Intake Openings**

The location of air intake openings will comply with IMC. All intake fans will be equipped with UV and insect filters. Air intake openings that terminate outdoors will be protected with corrosion-resistant screens, louvers, or grilles. Openings in louvers, grilles, and screens will be sized in accordance with IMC, and will be protected against local weather conditions. Outdoor air intake openings located in exterior walls will meet the provisions for exterior wall opening protective measures in accordance with IBC.

#### **Outdoor Air**

The minimum outdoor airflow rate will be determined in accordance with IMC. Ventilation supply systems will be designed to deliver the required rate of outdoor airflow to the breathing zone within each occupied space.

### **Air Balancing**

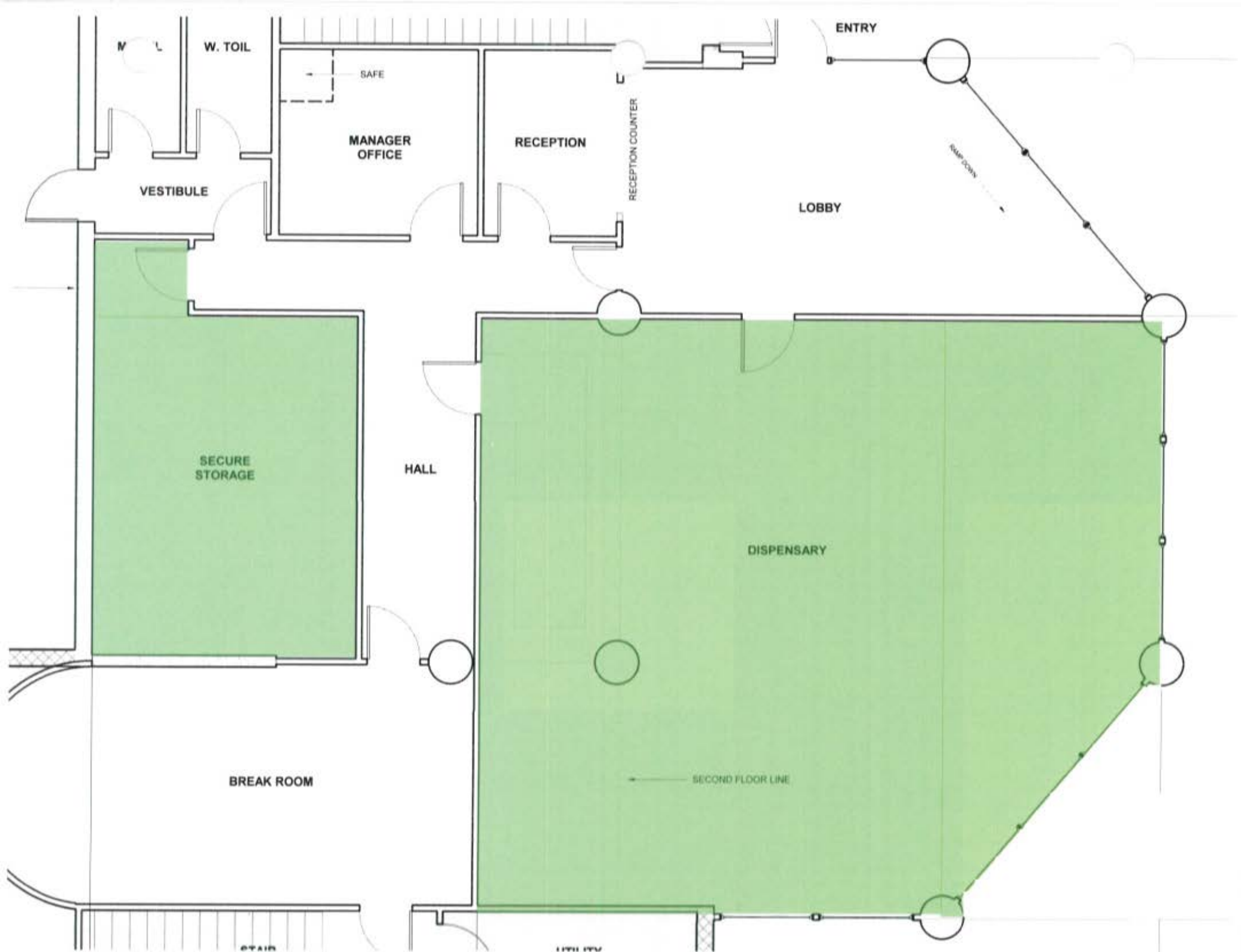
The ventilation air distribution system will be equipped with a means to achieve at least the minimum ventilation airflow rate as required by IMC. Ventilation systems will be balanced by an approved method.

### **Duct Systems**

Duct systems used for the movement of air in heating, air-conditioning, ventilating, and exhaust systems will conform to the provisions of IMC.

### **Dehumidification Equipment**

If required, the Facility will be equipped with a dehumidifier system. Humidity controls set at or below (60%) will be installed and maintained as necessary, according to manufacturer's specifications, to control mold or pathogen growth.



June 7, 2018

Re:

Harvest of Santa Rosa, LLC  
1015 Santa Rosa Ave, Suite A,  
Santa Rosa, CA 95404  
Cannabis Retail Dispensary  
City of Santa Rosa –  
Conditional Use Permit Application

As required by the City of Santa Rosa's Cannabis – Conditional Use Permit Application, the Owner has hired TEP Engineering to address three items regarding HVAC filtration and noise. These three items are "Storage of Cannabis Products/Inventory", "Odor Control – Engineering Controls" and "Noise".

### Dual EHS Permitting - Storage of Cannabis Products/Inventory

The project as proposed shall comply with the City of Santa Rosa's storage of cannabis products/inventory standards set forth in Zoning Code Chapter 20-46. Harvest of Santa Rosa, LLC will store and display packaged edible cannabis goods in spaces that have temperature and humidity controlled heating, ventilation and air conditioning (HVAC) systems. The outside and recirculated air for these HVAC systems will include filters that mitigate environmental contaminants such as smoke and dust. These filtration systems must be specified and sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions. The area in which edible medical cannabis goods are stored also may not be exposed to direct sunlight.

### Odor Control – "Engineering Controls"

The project as proposed shall comply with the City of Santa Rosa's odor mitigation standards set forth in Zoning Code Chapter 20-46. The industry accepted method to remove cannabis odors for exhaust airstreams is carbon filtration. Harvest of Santa Rosa, LLC will install activated carbon filter canisters or inline filters on their exhaust systems serving spaces at risk for emitting cannabis odors. Harvest of Santa Rosa, LLC will also install activated carbon inline filters on their recirculating air systems serving spaces at risk for emitting cannabis odors. These carbon filters are designed for the control of VOC's, odors and other gaseous contaminants. The spaces at risk for emitting cannabis odors are noted on the odor-control floor plan provided by Harvest of Santa Rosa, LLC; these spaces include the Dispensary and Secure Storage. The exhaust and recirculated air for these spaces will pass through an activated carbon filter, which uses chemical adsorption to remove organic compounds from the airstream. These organic compounds carrying the cannabis odor are captured through a process of adsorption in the microporous carbon. The activated carbon filtration systems must be sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions. Suitable activated carbon filters manufacturers include: Camfil, Can-Filters Canada, Purafil or approved equivalent by a Professional Engineer.

### Noise

HVAC equipment shall comply with the City of Santa Rosa's Chapter 17-16 (Noise) requirements. These HVAC systems must be specified and sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions.

Sincerely,



TEP Engineering  
Andrew Souza, P.E., CPD, GPD, LEED AP BD+C





**COPYRIGHT MATERIALS RELEASE-** To the extent that your application submittal packet includes plans or drawings prepared by a licensed, registered or certified professional, as defined pursuant to the California Health and Safety Code Section 19851 or Business and Professions Code Section 5536.25, such as a licensed engineer, architect or other design professional, the City must first obtain the signature release and permission of said professional prior to publication or reproduction of any such plans or drawings. Such drawings and plans may also be protected by copyright laws. The City of Santa Rosa hereby requests permission to reproduce and publish plans and drawings submitted with your application packet for purposes of more effectively and efficiently facilitating the entitlement review process, including making plans and drawings available on the City's website for public review and providing electronic reproductions to the City's review boards. The purpose of this request is limited solely to the purpose of facilitating the timely review of this application, and the plans and drawings will not be utilized by the City for other purposes. To assist the City in this process, please provide below the signatures of all of those who have prepared plans and drawings to be submitted with this application. PROJECT: 1015 SANTA ROSA AVE, SUITE A

Engineer Name: ANDREW SOUZA, P.E. (MECHANICAL ENGINEER)  
Phone: 707-538-0400  
Email Address: andy @ tep.net

ENGINEER /SURVEYOR'S SIGNATURE Andy Souza

Architect Name: \_\_\_\_\_  
Phone: \_\_\_\_\_  
Email Address: \_\_\_\_\_

ARCHITECT/DESIGNER'S SIGNATURE \_\_\_\_\_

Landscape Architect Name: \_\_\_\_\_  
Phone: \_\_\_\_\_  
Email Address: \_\_\_\_\_

LANDSCAPE ARCHITECT/DESIGNER SIGNATURE \_\_\_\_\_

There may be occasions (e.g., inclement weather) when the lights are required to be used during the day, which will be at the judgement of the General Manager. All outdoor lighting used for security purposes will be shielded and downward facing. In any case, we will adjust our external lighting to meet Sheriff standards and the City of Santa Rosa's guidance.

We will be using LED 4000K Flood Lights supplied by GE. These lights offer 11 years of light life (50,000 hours) and are widely used to illuminate similar buildings in the industry. The LED lighting solution selected takes into account security and safety requirements, design, energy efficiency (reduced carbon footprint) and a uniform distribution of light (to aid security cameras and minimize 'dark areas' which become potential security breaches).

The lights have a die-cast aluminum housing and a slim architectural design that incorporates an integral heat sink and light engine, ensuring maximum heat transfer, long LED life and a reduced Effective Projected Area (EPA). Lights meet 2g Vibration level per ANSI (C136.31 – 2010). The lights are rated at -40 degrees to 50 degrees Celsius and are fully compliant with all industry standards. The lights will be mounted on the building exterior and wired with cable to the building power.

## NOISE

The applicant will comply with the Santa Rosa City Code Chapter 17-16 regarding noise. This will include:

- Sound level from any sound-amplifying equipment shall not exceed 15 decibels above the ambient base noise level.
- Maintain an ambient base noise level of:
  - 55 decibels from the hours of 10pm-7am
  - 60 decibels from the hours of 7am-10pm

## VICINITY AND NEIGHBORHOOD CONTEXT MAP

See attached vicinity and neighborhood context map.

## SITE PLAN, ELEVATIONS, AND FLOOR PLANS

See attached site plan, elevations, and floor plans.

## PARKING ANALYSIS

We will provide adequate parking to support our occupancy in conjunction with Santa Rosa's ordinance regarding parking. We have 15 parking spaces exceeding the minimum (12) based on our occupancy. There is accessible bike parking for more than 1 bike exceeding the minimum (1) based on our occupancy. In compliance with the state, county, and city ADA requirements we have a handicap parking space accessible. See attached plans.

## HOURS OF OPERATION

☐ The Applicant's dispensary storefront will be open to the public during the hours of 7am-9pm daily. These hours will change if an alternative time frame is established by the local and state cannabis

authorities. Harvest will conspicuously post the hours of operation at the public entrance to the facility.

#### ADDITIONAL REQUIREMENTS FOR RETAIL

#### LOCATION

The applicant's facility would be located at 1015 Santa Rosa Ave Suite A, Santa Rosa CA 95404.

#### OPERATIONAL PLAN

Harvest Inc., if approved, will operate the following commercial cannabis operations from the business premises:

- Medical Dispensary
- Adult-Use Dispensary
- Medical Delivery
- Adult-Use Delivery

The Applicant proposes operating a 2,790 sq. ft Dispensary which is available to both Medical Patients and Adult-Use customers. Patients and customers must register at the Dispensary Lobby, showing either a Medical Card and/or a State of California ID Card. Records of each will be stored in a HIPAA Compliant customer management database with cloud storage at an offsite location. After clearing checks, patients and customers will enter the Dispensary and be able to shop for products. Limits apply to the amount of product that an individual can purchase each day.

Harvest of Santa Rosa will participate in the California Department of Public Health's (CDPH) Medical Marijuana Identification Card Program (MMICP) which was specifically established to create a State- authorized medical marijuana identification card (MMICP), along with a registry database for verification of qualified patients and their primary caregivers. The MMICP Web-based registry allows law enforcement and the public to verify the validity of a qualified patient or primary caregiver's MMICP as authorization to possess, grow, transport, and/or use medical marijuana within California.

Data will be stored by Harvest using industry specific cloud storage software. Our first priority is to ensure that such system provides secure electronic access to health data that is compliant with privacy rules and HIPAA Compliance (Health Insurance of Portability and Accountability Act). HIPAA Compliance ensures that data could never be released without either the patient's written consent or by court subpoena. Data is stored at an off-site HIPAA-Compliant Data Storage Centre and is SSL Encrypted.

Specifically we will also ensure that any Data Storage and Web-Hosting Services have:

1. A signed Business Associate Agreement (BAA)

2. Monthly vulnerability scans of your servers
3. Mitigation of the vulnerabilities discovered by the monthly vulnerability scans
4. Server hardening
5. Off-site backups
6. Log retention of 6 years

The Applicant would propose operating the Dispensary daily from 9am to 9pm, with retail staff permitted on-site (with a Manager in attendance) after 7am each day for 2 hours of administrative, cleaning, merchandising and inventory management procedures between 7am and 9am (as required).

## DELIVERY AND ON-SITE CONSUMPTION

### **Delivery Services**

The Applicant is applying for the opportunity to operate a Delivery Service from its premises which will serve the needs of elderly and mobility patients and customers, for both medical and adult-use sales. Orders will be verified through our Patient Management System and deliveries shall only be made to private houses.

### **Shipping & Transportation**

The Applicant will strictly adhere to all rules, requirements and regulations regarding shipment of medical cannabis to licensed delivery operators within the state of California as they are created and modified by City and State legislators. No deviation from those rules will be tolerated or allowed.

The Head of Security will implement additional measures beyond the minimum requirements.

### **Transportation Manifest**

- A LIVE transportation manifest will be created which tracks every order, purchase and product delivery;
- No product will leave the Facility without being accompanied by an authorized driver of the Facility, together with transportation manifests to show the vehicle information, driver and accompanying personnel information, date and time the delivery vehicle leaves the facility, the amount of product that is being transported, a breakdown of the individual boxes that will be delivered to individual patients and customers, the route that the vehicle will take, and expected delivery times for delivery to each delivery.

### **Order Fulfilment (Pre-Delivery)**

- Orders will be taken by the Applicant through an SSL Encrypted website, Smart-Phone APP and by phone. All Patients will be checked to ensure they have the appropriate Medical Card and California State ID Card.
- Received Orders will then be approved by the Shift Manager and queued for Packing. A Packer Employee will fulfil the order from stock in either the Ambient Storage Room or Cold Storage Room, where it will be packed in the Packing Room. It will then be queued for Dispatch.

- Packed Orders will be assigned to a Driver by the Dispatch Manager and moved to the Dispatch Room from the Packing Room. Limits will be set per Patient per day.
- The order fulfilment boxes (plastic) containing medical cannabis to be delivered to individual patients and customers will be verified, recorded and sealed. Once sealed they will be loaded into the lock boxes in the delivery vehicle from the Dispatch Room; and
- Both the Inventory Control Specialist and the driver that will accompany the product will verify the number of boxes, the date and time of delivery, the date and time that the delivery vehicle leaves the Facility, and the addresses to which the product will be delivered.
- Only after the delivery employee has completed the check with checklist for delivery will the vehicle then be driven out of the lock area, and immediately begin its delivery route.

#### **Order Fulfilment (Post-Delivery)**

- Post-Delivery, once the delivery vehicle is in the locked and secured area designated for that purpose, the lockbox inside of the delivery vehicle will be opened by delivery personnel; and
- The Inventory Control Specialist will perform a visual verification that the lockbox is in fact empty and contains no leftover medical cannabis products from a previous delivery. If there is medical cannabis, it will be removed from the vehicle, identified, recorded and placed in the vault for either reshipment or in the case of a cancelled order, the box seal will be cut, the contents verified as being un-tampered with and then re-stocked into inventory and recorded as being re-stocked, including time, date, amount, package numbers, weights, employee performing the re-stocking and reason for the return of the product. Any product that has been tampered with
- Any cash payments received by the Driver will be logged, accounted for, signed and held in the cash register until the end of the shift or day, at which point it will be counted and locked in the Walk-In Vault.

#### **Communications**

- Each driver will carry a communication device and a cell phone for backup communication.
- Driver will always remain in contact with the Applicants Central Security Control Room as well as 911 and emergency services, if necessary.

#### **Route Planning**

- The Dispatch Team will plan route security after the time and destination are determined. Routes will be randomized and times varied. Other consideration, in addition to randomization and time, for each route will be based upon:
  - ✓ Operational security (based on number of stop on route, crime by area,



known previous routes etc.);

- ✓ Traffic (time of day or road incident);
- ✓ Known public events, i.e. parades, demonstrations, unusual activity using current information available from a variety of sources to include news releases, police and city offices, social media; and
- ✓ Ongoing real-time incidents that would impede delivery.

### **Driver and Patient / Customer Safety**

- The driver will be trained regarding required protocols for personal safety, product safety, operational policy and inventory control.
- The driving team will be trained to place their safety and public safety above other actions.
- Drivers will immediately notify the Applicant monitoring centre of a conflict, deviation or threat.
- In case of a robbery, attack or threat to public, the driving team is not to engage in proactive action that would further endanger them or the public. The driving team is to take the best and safest action needed to protect themselves and the public while maintaining control of the product if possible. Once a safe environment exists and as soon as possible, they will notify the monitoring centre and the police via 911 of the event and all available details.
- The Central Security Control Room will actively engage with the police regarding GPS information to locate the shipment/vehicle if applicable.
- The driving team will notify the Central Security Control Room upon departure and they will check in every half-hour. The driving team will notify the Central Security Control Room and the dispensary that medical cannabis is going to be delivered to when the delivery team is 5 minutes away, one minute away, upon arrival, upon leaving the dispensary and at trip conclusion.
- Immediately upon return to the Facility the drivers will enter into the Data Management System the amount of product delivered, to whom, batch numbers, receipts for receiving the products and any other information about the trip.

### **Carriage of Business License**

All vehicles associated with the business shall carry in the vehicle a copy of the valid, unexpired business license.

### **Restricted Sales & No On-site Consumption**

There shall be no sale or sale to any person not in possession of a valid identification card denoting the person as a qualified patient or a caregiver as defined by law. Our Point of sale system has built in transaction limits to prevent any sale from exceeding California state regulation. There will be no facilities for on-site consumption and the consumption of all alcohol and cannabis products on site is strictly prohibited.

### **Estimated Annual Retail Sales (Quantity and Revenue)**

The Applicant estimates that monthly retail sales would be \$240,000.00 (200 patients and customers a day at \$40.00 an average basket). Annually, this would be \$2,880,000.00 of total retail sales.

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## **STOREFRONT, SIGNAGE & WINDOW TREATMENTS**

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### **Storefront Treatment**

Storefront treatments will comply with local signage ordinance. Informational signage is informative to patients/customers (store hours, video cameras in use, etc.). Brand signage is professionally built with "Harvest" name and logo, we do not use a green cross or leaf in our branding.

### **Signage**

Signage will conform to the rules set forth by the Bureau, the City and all applicable state and local laws, regulations, ordinances, and other requirements. If approved by Bureau and allowed by the City, a phone number and website may also be displayed to provide a resource for obtaining additional information about Harvest. Harvest's hours of operation, as allowed by state and local requirements, will be conspicuously posted at all public entrances to the Facility. Signage will be limited to one (1) wall sign no larger than twenty (20) square feet in area. Interior signage will not be visible from the exterior. No temporary signs such as window signs or banners will be posted.

The License Certificate, along with a copy of the current certificate of occupancy for the Facility and any other certificate, business license, or other authorization required to conduct production activities, will be posted in a conspicuous place within the Facility and made available to the Bureau and all fire code and building officials upon request.

Internal signage will also include signs that conspicuously state:

- "Smoking, ingesting or consuming cannabis on this property or within one hundred feet (100') of the business is prohibited."
- The explicit prohibited conduct involving marijuana and marijuana products contained in Health and Safety Code Section 11362.3. Harvest will use the standard format and content developed by the City.

The License Certificate, along with a copy of the current certificate of occupancy for the Facility and any other certificate, business license, or other authorization required to conduct production activities, will be posted in a conspicuous place within the Facility and made available to the Bureau and all fire code and building officials upon request.

External signage will not:

- Promote the use of cannabis and cannabis products.
- Be appealing to minors.
- Include prices of cannabis and cannabis products.
- Provide advertising visible to members of the public from any street, sidewalk, park, or other public place, including advertising utilizing any of the following media:
  - o A sign mounted on a vehicle.
  - o Consist of any hand-held, human signage, or other portable sign.

## Windows

All exterior windows at the Facility will be coated with bulletproof window film with break strength of four hundred pounds per inch (400 lbs./inch). Shock sensors and motion detectors will also be installed on the windows. Unlike glass-break sensors, shock sensors provide a quicker response in the event a window is not broken on the first strike. In the event of a window strike, an alarm will be set off.

Additionally, the Facility's main entrance vestibule will have a bulletproof service window between it and the check-in desk to facilitate communication and allow identification and other print materials to be passed through to a Security Guard or properly trained retail employee to ensure that only qualified individuals gain access to separate, locked areas where cannabis products are displayed.

## MERIT BASED REVIEW

The Applicant understands that a Merit Based Review System will be adopted for the allocation of Licenses in Santa Rosa. We have included information and our response to this Merit Based Review System in the following pages.

## LOCAL AND STATE COMPLIANCE

### Managing Compliance

The business shall be governed and managed by an Executive Committee from Harvest Inc., and a General Manager from Harvest of Santa Rosa LLC.

The General Manager is the head of the business and all commitments thereunder including ensuring that all commitments to the City and State are being met. Harvest Inc. shall ensure that all obligations, taxes, fees and other operational procedures are in place.

Specifically, the General Manager shall also ensure the following Compliance Measures take place:

- Providing all necessary information and reports to regulatory agencies;
- Monitoring reports from the inventory control system;
- Tracking any discrepancies between known or expected values, counts, weights or other information back to the source of the error;

### **Managing Compliance**

The business shall be governed and managed by an Executive Committee from Harvest Inc., and a General Manager from Harvest of Santa Rosa LLC.

Harvest Inc. shall implement a framework that ensures all obligations, taxes, fees and other locational and operational requirements are in place and up-to-date. Harvest Inc. shall oversee a dedicated and full-time internal audit, regulation and compliance management team. The General Manager is the head of the business and all commitments thereunder and will ensure that all day-to-day commitments to the City and State are being met.

Specifically, the General Manager shall also ensure the following Compliance Measures take place:

- Providing all necessary information and reports to City staff and regulatory agencies;
- Maintaining copies of state, regional and local agency permits, approvals and certificates;
- Facilitating inspections and Fire Department and law enforcement access as needed, including providing a Fire Department lock box for keys to gates and doors;
- Monitoring reports from the inventory control system;
- Tracking and reporting, as necessary, any discrepancies between known or expected values, counts, weights or other information back to the source of the error;
- Providing input and implementing changes to protocols to correct errors, and/or other deficiencies in the Facility operations;
- Monitoring shipping manifests, inventory levels, inventory weight amounts, and other seed to sale tracking information;
- Maintaining confidential information;
- Screening prospective employees;
- Training staff on standard operating protocols and procedures;
- Overseeing day-to-day operations;
- Identifying and resolving company risk, compliance and legal issues;
- Reporting to Harvest Inc.;
- Interfacing with Security;
- Interfacing with the Head of Regulation and Compliance;
- Engaging local counsel when necessary; and
- Any other responsibilities required by management.

### **Adherence to State, County, Regional and City Policies and Directives**

It is the Company's commitment to operate in full compliance with applicable state, local or federal laws, regulations, and orders at all times. The Company will obtain and maintain in good standing all required licenses and permits, including but not limited to state and local business licenses, tax registrations and certificates, sellers permits, conditional use permits, building and occupancy permits, annual operating fire permits, and Sonoma County Health Permits. The Company will not commence operations until all necessary state and local licenses and permits have been obtained. To guarantee compliance with state, county,

regional, and city policies and directives, this Document and all Standard Operating Procedures adopted by Harvest of Santa Rosa LLC have been carefully constructed in consideration of and shall continually conform to the following pieces of legislation, policy, regulations and other directives as the same may be amended:

- Proposition 215 – Compassionate Use Act (1996)
- MCRSA – Medical Cannabis Regulation and Safety Act (2015);
- Proposition 64 (2016) and the Control, Regulate and Tax Adult of Marijuana Act (AUMA) and implementing legislation and regulations promulgated thereto;
- The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), and the regulations promulgated thereto; City of Santa Rosa Comprehensive Cannabis Ordinance (2017);
- City of Santa Rosa General Plan policies;
- The tax ordinance pertaining to cannabis businesses in the City of Santa Rosa;
- Other applicable provisions of the City of Santa Rosa's Municipal Code, including but not limited to regulations governing building, grading, plumbing, septic, electrical, fire, hazardous materials, nuisance, and public health and safety;
- Conditions imposed by a City, County, or State pursuant to an issued permit or license;
- California Uniform Controlled Substances Act;
- Other California legislation touching and concerning cannabis business operators; and
- Any and all relevant regulations, guidance, directives and issuances from regulatory agencies, including but not limited to: Bureau of Cannabis Control (BCC), CalCannabis Cultivation Licensing within the Department of Food & Agriculture, the Manufactured Cannabis Safety Branch within the State Department of Public Health, California Department of Fish and Wildlife, California Department of Pesticide Regulation, California Department of Tax and Fee Administration, California State Water Resources Control Board, Santa Rosa Fire Department, Santa Rosa Police Department, and Sonoma County Sheriff's Department.

The Company recognizes that the laws governing cannabis businesses and facilities are far reaching and ever changing. State laws pertaining to cannabis include various Business and Professions, Civil, Evidence, Fish and Game, Food and Agricultural, Government, Health and Safety, Labor, Penal, Revenue and Taxation, Vehicle, Water, Building, Electrical, Mechanical, Plumbing, Energy, Fire, and Green Building Standards Code Sections. The three cannabis licensing authorities – namely, the BCC, CalCannabis Cultivation Licensing and Manufactured Cannabis Safety Branch – have recently readopted emergency regulations which will likely change and evolve in the regular rulemaking process. Accordingly, a dedicated and full-time internal audit, regulation and compliance management team will ensure that all operations are in adherence to local, regional and State Laws and regulations regarding all aspects of the cannabis operations. The compliance management team will monitor for the latest changes, amendments and updates at the federal, state, regional and local levels and suggest revisions to the Company's policies as needed. This team sits within Harvest Inc. Any standards will meet or exceed City and State Regulations and any changes must be approved by the Head of Regulation and Compliance who will interface with the



General Manager. We will place added emphasis on meeting or exceeding all required locational and operational standards including, but not limited to, all required employee background checks, restrictions on multiple licenses (if applicable) and license types and locational criteria.

The Company has selected and will continue to recruit qualified individuals who will uphold the Company's high standards and ensure that all operations of the Company remain in compliance with all applicable laws and regulations. Staff training for regulation and compliance will be implemented at least annually with periodic updates as needed and all staff must PASS required mandatory tests each year regarding the handling, treatment and dispensing of cannabis plants and products

Specific Compliance procedures will be implemented to ensure that the Commercial Cannabis operation meets any directives under Santa Rosa Ordinance No. ORD-2017-025, BCC regulations and the Attorney General's Guidelines for the Security and Non-Diversion of Marijuana Grown for Medical Use.

Standard operating procedures as well as written health & safety information will be kept on site and made available to all employees.

These documents will be reviewed for content and accuracy at least annually. The documents will include emergency contact information. All staff will have detailed knowledge and comprehension of the Standard Operating Procedures, as demonstrated through testing and performance reviews.

Safety policies detail procedures for ensuring the implementation of best safety practices at all times and in accordance with Occupational Safety and Health Administration (OSHA) guidelines throughout all facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of employees and the public is the company's foremost business consideration. All employees will comply with all applicable safety regulations as listed in the SOPs as a condition of employment. Safety training will be provided as often as necessary to ensure the safety and welfare of the employees, contractors, and residents of the community and annually at a minimum.

Safety rules addressed include those relevant to emergency response, accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment (PPE). Enforcement measures and disciplinary actions are to be implemented in response to safety rule violations established in SOPs.

Training and continuing education will be provided as often as necessary and annually at a minimum with workplace safety discussions included in employee meetings and communications at a frequency determined by management and as needed.

### **General Plan and Zoning Code Consistency**

The City of Santa Rosa is committed to preserving its special identity and character while building new features which provide enduring value and further improve the quality of life. The General Plan addresses issues related to the physical development



and growth of Santa Rosa and sets forth guiding principles and policies in furtherance of the City's long-term goals. When the City Council adopted the zoning amendments contained in the City's Comprehensive Cannabis Ordinance, the Council found that the amendments were consistent with the goals and policies of the General Plan because they direct cannabis businesses like retailers and delivery services to appropriate commercial districts.

The proposed location is situated in compliance with and consideration of the General Plan and zoning code. The lot upon which the selected property sits has a General Plan designation of "Medium-Residential" and "Retail & Business Services." However, it should be noted that the suite proposed for this project is situated entirely within the Retail & Business Services area (see attached diagram). For purposes of the General Plan, Retail and Business Services are defined as retail and service enterprises, offices, and restaurants. The zoning code designation for 1015 Santa Rosa Ave, Suite A is CG (General Commercial). Zone CG applies to areas considered appropriate for a range of retail and service land uses serving residents and businesses throughout the City. The CG zoning district is consistent with the Retail and Business Services land use classification of the General Plan. See Santa Rosa, California, Municipal Code § 20-23.020(C).

Pursuant to the Santa Rosa Comprehensive Cannabis Ordinance and amended zoning code, Cannabis retail and delivery services are permitted in the CG zone with a conditional use permit provided that the location is not within 600 feet of schools or existing dispensaries. Here, the proposed location is over 1 mile away from the nearest school and existing dispensary. the previous use was a used car lot, and the property abuts numerous car dealers and car care providers. The proposed project will generate jobs and economic growth for the community while adhering to density and intensity requirements under the General Plan. Harvest of Santa Rosa will enhance the neighborhood by developing the site into a state-of-the-art retail and delivery service location similar to other Harvest Inc. locations in various states across the nation. The architectural, aesthetic, and site planning features follow all design guidelines for the City of Santa Rosa. Santa Rosa Avenue is a major corridor, so the utmost care will be taken to ensure the façade is aesthetically pleasing and the site plan is user friendly. As demonstrated on the attached site plan, the storefront entrance is in a visible location that provides an unobstructed view from the public right-of-way. It follows that the proposed use will add to the range of high quality retail and services available to residents without detracting from existing and future uses.

The Company has taken proximity to residential and other sensitive uses into consideration when developing its design, policies and procedures. To establish and maintain positive neighborhood relations in keeping with the General Plan, the Company will appoint a Community Relations Liaison who will proactively establish relationships with law enforcement, neighboring residents and business owners. The Community Relations Liaison will serve as a point of contact that can be reached day or night should any questions, comments, concerns or operational problems – including but not limited to noise, odor, littering, loitering, or illegal activity – arise. The name, phone number, facsimile number and email address of the Community

Relations Liaison will be mailed and/or hand delivered to the City Manager and all residences within a two-block radius. The Community Relations Liaison or designated manager will make reasonable efforts to redress all complaints in a timely manner. The Company will do everything in its power to prevent access or diversion to minors, and no advertising signs will be placed within 1,000 feet of a day care center, k-12 school, playground or youth center. Security of not just the business but the community as a whole is of the utmost importance to the Company. A security guard will monitor and regularly patrol the site and surrounding neighborhood to prevent and detect nuisances and ensure all locational and operational standards are being upheld. The Security Plan includes surveillance, lighting, limited and controlled access areas, secure storage and waste, and alarms designed to deter criminal activity and prevent theft and diversion for public safety.

The City of Santa Rosa is a leader in sustainable practices and resource conservation, which are prioritized in the General Plan. Accordingly, the Company plans to implement eco-friendly design elements and green business practices. The Company will employ waste reducing strategies to ensure we leave smallest footprint possible. Interior lighting will be low wattage with continuously dimmable local switches throughout, consistent with energy code and all City of Santa Rosa requirements. Exterior lighting will be sufficient to provide illumination and clear visibility to all outdoor areas of the premises for security purposes while also being low wattage and provided schedule control in addition to photocell control. A new, efficient hot water heater will be provided. All new plumbing fixtures will be low flow, consistent with plumbing code, CalGreen code and all City of Santa Rosa guidelines. Low-flow GPM aerators will be installed on sinks throughout the facility to help reduce the amount of water used.

Overall, the design, location, size, and operating characteristics of the proposed project are compatible with existing and future uses and will not be detrimental to the public interest, health, safety, convenience, or welfare of the City. It is the Company's goal to go above and beyond City Code and general plan requirements in order to seamlessly integrate into the community we serve.

# City of Santa Rosa

## Public GIS Viewer

1015 Santa Rosa Ave

Home Map Tools

Tool Labels X

Layer List Filter Upload Data Linked Maps

Layers Linked Maps

### Layers

Planning and Economic Development

Filter Layers...

Filter

- ☐ Medium Density Residential
- ☐ Medium High Density Residential
- ☐ Mobile Homes
- ☐ Retail & Business Services
- ☐ Retail/Medium Residential Mixed Use
- ☐ Retail/High Residential Mixed Use
- ☐ Office/High Residential Mixed Use
- ☐ Office/Med Residential
- ☐ PubInst/Med Residential
- ☐ Lt Ind/Med Residential Mixed Use



County Aerial City Aerial

No Aerial

60m

200ft

## SPECIAL EVENTS

Over the past five years, we have hosted several events at our existing medical cannabis dispensaries. We have obtained Special Event Permits for each event and have received approval from Community Special Event Tasks Forces, as required, to ensure adherence to local event-related rules and regulations. We will continue this track record of regulatory compliance at the proposed Santa Rosa dispensary.

In compliance with Section 20.46-090 of the Santa Rosa Code, we will obtain state and local temporary special event permits if we plan to host an event that involves cannabis sales to patients. We will not host any on-site consumption events. Such events will not commence until we have demonstrated that all necessary local permits, state temporary event licenses, and agency permits have been obtained. We will ensure that said permits are in compliance with any regulations and deadlines established by the City and the state.

Depending on the location of the event, we will submit the appropriate application for a cannabis special event in a timely manner which would include a temporary use permit in accordance with Section 20-52.040 or a special event permit in accordance with Chapter 11-40. A Special Event Permit Application, as required by Council Policy 000-09, will be submitted at least 30 days prior to the event along with applicable fees.

We will attend any pre-event meetings that may be required to establish conditions of use and will maintain General Liability Insurance in the amount of \$1,000,000 for all events permitted through a Special Event Permit. If necessary, we will obtain the following additional permits:

- Amplified Sound Permit
- Fire Department Permit
- Santa Rosa Business Tax Certificate
- Health Department Permit

## EMPLOYEE REGISTER

In compliance with Section 20.46-080(F)(1) of the Santa Rosa Code, we will maintain a current register of all employees employed at the dispensary. This register will be disclosed to any city officer or official for purposes of determining compliance. This register will include the following information:

- Full name, address, phone number, and emergency contact
- Social security number or individual tax payer identification number
- Date employment began
- Date of termination of employment, if applicable, and the reason for termination

Other employee-related records will include discipline records and employee evaluation forms.

## Discipline Records

Response to an employee's failure to comply with policies and rules will depend on the nature and severity of the violation. Management may choose to immediately discharge the employee; however, corrective action will generally follow our Progressive Discipline Policy, which involves a three-step evaluation process. At each step in the process, management will document the following information:

- Employee name
- Date of hire
- Job title
- Name of manager or supervisor
- Date of corrective action
- Progressive discipline step (1, 2, or 3)
- Specific examples of inappropriate conduct by the employee, including frequency, gravity, who, where, how, and when
- Specific action to be taken by the employee to correct the inappropriate conduct, including date by which such conduct may occur
- Consequences of the employee's failure to correct the inappropriate conduct

## Employee Evaluation Form

Employees will be formally evaluated on a biannual basis from the date of hire. Prior to the evaluation, both the employee and supervisor will complete a form on which the employee's performance will be evaluated in relation to the company's core values. The employee will be rated on each value on a scale of 1 (Unsatisfactory) to 5 (Exceeds Expectations) and will provide examples that corroborate the rating to facilitate discussion.

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All employee records, including the employee register, will be stored for at least seven years in compliance with California State requirements for record storage.

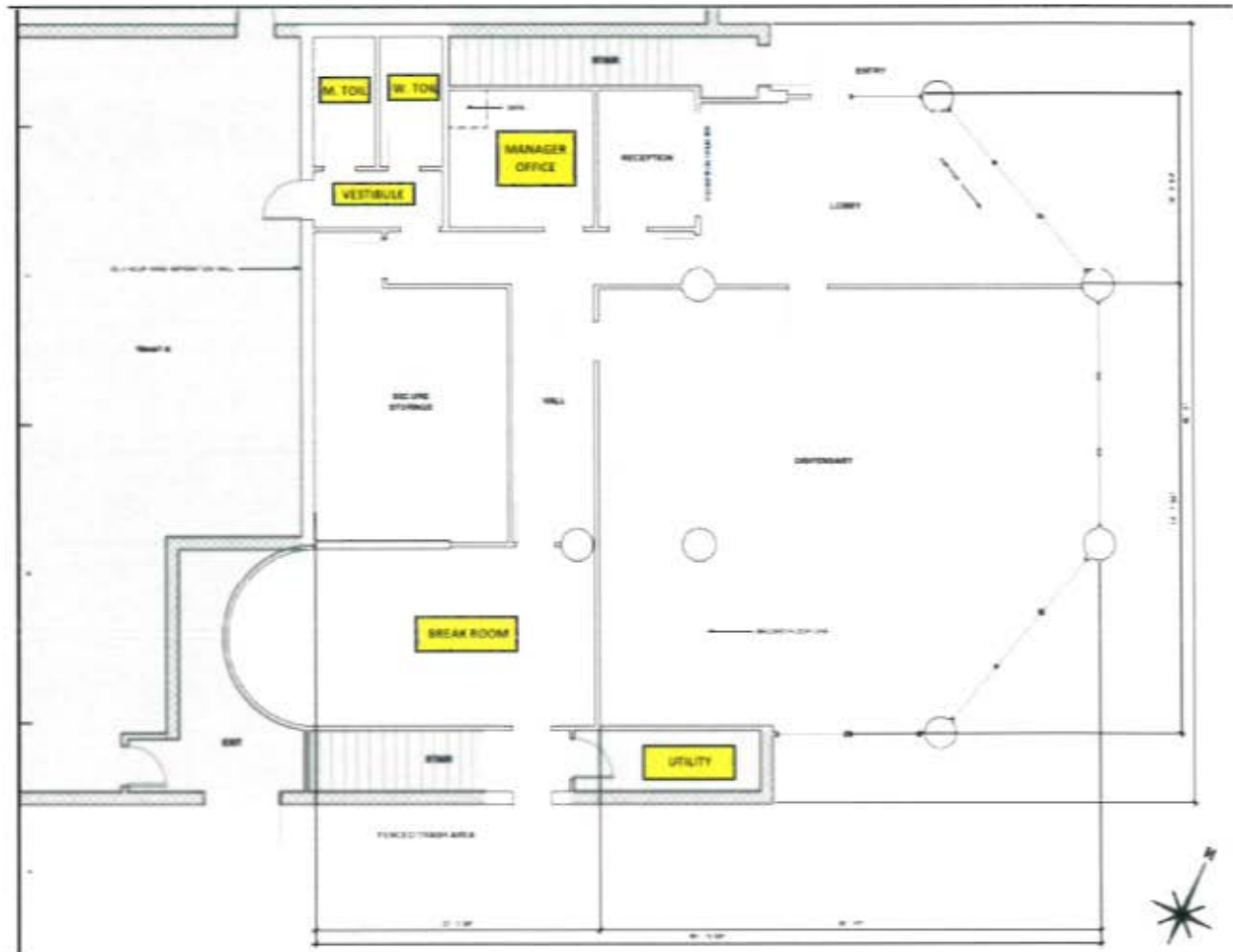
## ACCESSORY USES

Areas that will include non-cannabis accessory use are as follows (see below floor plan with highlighted accessory use areas):

- **Manager's Office.** This will be utilized for the Dispensary Manager to host meetings, provide disciplinary action for employees, maintain locked employee information storage, and contain a work computer for the Dispensary Manager to use for all necessary work functions.
- **Break Room.** This room will be accessible to employees only and will include a refrigerator, microwave, sink, and tables with seating for employees to comfortably take their lunches and breaks.



- **Utility Closet.** This will be used for storage of non-cannabis equipment such as extra labels, receipt paper, cleaning supplies, toiletries, printer paper, printer toner, etc.
- **Restrooms.** These facilities will be locked at all times and only accessible to employees or customers escorted by employees.
- **Vestibule.** This room will facilitate access to the locked restrooms.





times and in accordance with Occupational Safety and Health Administration (OSHA) guidelines throughout all facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of employees and the public is the company's foremost business consideration. All employees will comply with all applicable safety regulations as listed in the SOPs as a condition of employment. Safety training will be provided as often as necessary and annually at a minimum.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment (PPE). Enforcement measures and disciplinary actions are to be implemented in response to safety rule violations established in SOPs.

Safety training will be provided as often as necessary and annually at a minimum with workplace safety discussions included in employee meetings and communications at a frequency determined by management and as needed

## SITE MANAGEMENT

### EXPERIENCE IN RETAIL CANNABIS IN NORTH BAY AREA

Mrs. Monica Hesz, a native of Sonoma County, is a owner of Harvest of Santa Rosa, LLC and has extensive managerial experience with local Northern Bay Area experience totaling over fifteen years. In 2016 Monica entered the cannabis industry opening Revolution Emporium in Ukiah (See attached licenses). Partnering with a group of friends and family they set out to build a trusted brand to serve their community that they call home. With her management experience Monica quickly helped develop their dispensary into a patient and community focused local business to provide the best products and education to their patients. Mrs. Hesz was essential in setting up the entire organization of Revolution Emporium and took a particular focus in Human Resources where she was integral in the hiring process in addition to payroll, taxes, and employee training. Current employee count is 6 with an almost non-existent turnover rate due to the hard-working family environment Monica helped create at Revolution Emporium.

Since the opening of the dispensary in 2016, Revolution Emporium has registered 7,000 patients and have generated revenue going from 60k a month to 134k a month. Monica has taken pride in ensuring her cannabis business flourishes but also maintains compliancy with local and state law. Before cannabis licenses were required Revolution Emporium paid all required business license fees and successfully renewed their business license. With the new regulations going into effect, Revolution Emporium has also acquired the required temporary licensing from both Mendocino County and California State. Additionally the business has paid all necessary taxes including the five percent (5%) cannabis tax.

One of the most important aspects of running a cannabis business to Mrs. Hesz is giving back to the community that supports the business. During the northern California fires

Revolution Emporium was a drop off site for supplies for families affected by the fires. Monica helped establish a program specifically to assist homeless veteran patients by providing them low to little cost medication and creating an environment where these veterans felt comfortable enough to open up about their needs. On several occasions Revolution Emporium has raised money for specific patients' needs such as water and phone bills on a case by case basis to help those that needed it the most. Mrs. Hesz and Revolution Emporium have maintained a strong relationship with both the city and county which she will also pursue in the Santa Rosa community. Below are some photos of Revolution Emporium.







#### QUALIFICATIONS AND BACKGROUNDS OF PRINCIPALS

Harvest is a national cannabis company with deep connections to each local community, we serve. Our team of experienced operators have transformed the industry by putting patients first, capitalizing on emerging technologies, and executing advanced regulatory compliance. With decades of regulatory and operational experience in medical marijuana, our team members have successfully secured licenses to operate in four states and have provisional licenses pending in Pennsylvania, Ohio, and Arkansas. Our team has an unparalleled knowledge in the rigors of marijuana compliance, including inventory tracking, security, testing, and proper disposal of products.

## EXECUTIVE LEADERSHIP

### Steve White, Chief Executive Officer and Owner

Mr. Steve White founded Harvest in 2012. Beginning with a single dispensary in Tempe, Arizona, Mr. White has developed Harvest into one of the largest medical cannabis companies in the United States. Harvest presently holds twenty-six (26) licenses in seven (7) states, with operating facilities in four of those states (Harvest's first Pennsylvania dispensary and Ohio cultivation facility are currently under construction and will be operational in 2018). In addition to overseeing medical cannabis license acquisition, facility start-up and operations, and providing guidance on organizational direction and strategy, Mr. White has also been instrumental in navigating state and county level regulatory audits, including, to date, ten (10) county building safety certificate of occupancy inspections, five county health department inspections, 16 state department of health services inspections, four Americans for Safe Access Patient Focused Certifications, and fourteen (14) certified financial audits.

After opening Harvest's first dispensary, Mr. White worked there for several months fulfilling orders, performing reception duties, and consulting with patients. Through those consultations, he quickly learned that he had the ability to help shape a company that gave people control over an aspect of their life where they previously had very little – their health and wellness. This realization led Mr. White to instill a culture of education and empowerment at Harvest to provide patients much needed products, resources, and support.

For example, Harvest facilities host monthly support group meetings for individuals suffering from epilepsy, chronic pain, cancer, and PTSD. Under Mr. White's direction, Harvest has also engaged in a number of community activities and events, including the donation of over \$400,000 to local charitable organizations, veterans, seniors, and patients in need.

Mr. White also serves on the board of directors for Harvesting Hope, a 501(c)(3) non-profit organization dedicated to improving quality of life for young children suffering from seizure disorders. To date, Harvesting Hope has raised and distributed nearly \$30,000 and provided services for over one hundred (100) families and their children.

Prior to his work at Harvest, Mr. White graduated summa cum laude from Arizona State University's Honors College in 1995 and then from Washington and Lee's School of Law in 1999, where he served as a law journal editor and National Moot Court Team Captain. After graduation, he practiced law – business litigation and business/administrative/regulatory law – for several national law firms. In 2005 he founded his own business litigation law firm and achieved an AV rating, the highest possible rating for skill and ethics. There, Mr. White garnered broad regulatory experience, and for twelve years represented clients across a variety of industries, including engineering, law, chiropractic, and contracting, facilitating compliance with regulatory structure.

Mr. Chris Hewitt holds an MBA from Arizona State University and over the past 16 years he has gained a wide variety of experience operating companies large and small. As co-founder of ThoughtLava, LLC, a funded web services start-up, he raised capital, created financial and business plans, and oversaw daily operations. He has also managed billion-dollar higher education, healthcare, and technology companies, including the development and implementation of corporate budgets, annual profit and loss reports, short- and long-term operational strategies, annual operating plans, and proprietary business planning and go-to-market frameworks.

Mr. Hewitt has worked under and with a variety of regulatory and government agencies, including the SOX Act, the Health Insurance Portability and Accountability Act, the Affordable Care Act, Medicare and Medicaid, the Department of Education, the Family Educational Rights and Privacy Act, and Data Security Standards. While overseeing operations of acute care hospitals and physician's groups, Mr. Hewitt gained considerable experience in the secure tracking and control of pharmaceutical medicines and healthcare equipment, tracking availability among suppliers and current hospital inventory. In the technology industry, he oversaw government contracts requiring secure inventory tracking and control, including inventory segregation, asset tagging, secured locations, RFID serial number tracking, and independent security systems.

Throughout his childhood, Mr. Hewitt watched his parents manage – and struggle with – severe mental health issues. While mostly effective, their medications often came with a variety of side effects. He believes that, had it been available, medical cannabis could have helped manage

some of their issues, like nausea and lack of appetite, leading to an overall improved quality of life. One of his driving motivations is his belief that medical cannabis provides patients with the unique opportunity to meaningfully participate in the management of their own health.

For Harvest, Mr. Hewitt oversees all dispensary, cultivation, and production operations, including start-up and ongoing operations. He also assists Siobahn Carragher, the director of human resources, in maintaining compliance with state and local regulations, and has supervised the creation and implementation of policies and procedures developed in consultation with regulations, guidelines, and standards developed by the International Organization for Standardization, the Food and Drug Administration, the World Health Organization, the Occupational Safety and Health Administration, and the Drug Enforcement Agency.



Mr. Howard Hintz graduated from the University of Toledo with a Bachelor of Business Administration degree in Accounting. Mr. Hintz passed the CPA exam in his first sitting and became a CPA after meeting the minimum experience requirements for the State of Ohio.

Mr. Hintz was working for the international CPA firm Peat, Marwick, & Mitchell (PMM) in Toledo, Ohio for four (4) years when he received a promotion and transferred to the Phoenix office. A few years later, Mr. Hintz left PMM and became a partner in a small but successful real estate development company, where he helped purchase and develop over ten (10) strip shopping centers, office buildings, and other commercial real estate.

In 1988, Mr. Hintz joined the Danny's Family Car Wash organization as its CFO and Director of Development to assist in its expansion plans. At the time that Mr. Hintz joined Danny's, it had only 1 location. With his extensive accounting background and real estate development experience he quickly became a partner in Danny's, where he then helped purchase and develop twenty-two (22) additional locations. With his assistance, Danny's grew into the largest full-service car wash group in the state of Arizona, with sales exceeding \$30 million per year.

Mr. Hintz left and sold his interest in Danny's in 2001 and joined Full Circle Auto Wash, who had purchased five locations from Danny's, four of which Mr. Hintz had developed himself. He acted as the CFO and Director of Development for two years and became a partner in 2003. Full Circle developed two more locations before Mr. Hintz left the company in 2008, eventually selling his interest in 2012. As a licensed Arizona Real Estate Agent, Mr. Hintz was invited to be a panelist at the International Car Wash Association's "New Investor Seminar" five years in a row.

Over the years, Mr. Hintz formed How Hi Development Corporation, and worked as a consultant for business and real estate development issues with Restaurant and Retail Properties, Inc., assisting companies such as W Development, Pima & Dynamite, Sushi Brokers, Brokers Bar & Grill, and WestPac USA. During this time, Mr. Hintz also owned and operated a Dairy Queen in Avondale, Arizona for three years with his family.

For years Mr. Hintz has been the CFO of numerous entities with operations in Arizona and North Dakota, as well as the Director for two non-profit medical marijuana Arizona licensed dispensaries. Mr. Hintz was also a founder and member of the Board of Directors for a 501(c)(3) charitable organization, the Phoenix Phenoms Girls Basketball Club. He was also the assistant varsity basketball coach for Arcadia High School Lady Titans.

Mr. Hintz is proud and excited to work with Harvest as a financial and agreement advisor, helping this rapidly growing company with accounting and legal issues. For Harvest, Mr. Hintz oversees the finance and accounting departments, where he is responsible for GAAP compliant procedures, refining inventory cost accounting process, establishing and maintaining departmental budgets, and developing financial projections to guide company strategy.



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#### Liesl Sicz, Director of Retail Operations

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Ms. Liesl Sicz has nearly twenty-one (21) years of retail management experience. For sixteen (16) years, she served as Corporate District Manager for Charming Shoppes, Inc., a national corporation of retail women's fashion stores (Fashion Bug, Lane Bryant, Catherine's). In that role, Ms. Sicz managed twenty-five (25) stores and over four hundred (400) employees across five states and opened more than forty (40) independent retail locations. She was consistently ranked first in the company for sales volume and profit margin and was one of six District Managers to assist the company president in creating new processes and developing best hiring practices. She also won several awards for her work, including the Hawk Trophy for sales (five-time winner), the President's Select Award for generating new ideas to drive profit, and her district was first in sales for four years.

Ms. Sicz joined Harvest in 2013. Over the past five (5) years, she has opened and oversees Harvest's dispensaries, including opening two dispensaries simultaneously, one in Arizona and one in Nevada, demonstrating her ability to maintain compliance with and initiate successful operations under varying regulatory agencies. She has consistently increased retail sales 30%+ year over year at each dispensary and has successfully navigated dozens of state, local, and Americans for Safe Access audits and inspections, ensuring compliance with state-specific standards, including those related to patient/caregiver card verification, out-of-state cardholders, packaging and labeling, forms of medical cannabis permitted for distribution, point of sale software, inventory tracking software and requirements, product reception, laboratory testing, delivery and transport, access limitations, product display, and marketing and advertising.

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#### Siobahn Carragher, Director of Human Resources

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Ms. Siobahn Carragher holds two master's degrees, one in Education from Arizona State University and another in Social Work from the University of Phoenix. She has extensive experience in the highly-regulated healthcare industry, serving as HR Manager at Hamilton Prosthetic and Orthotic Centers and for Pongratz Orthotics and Prosthetics, in addition to employment law experience while employed at Hamilton, Pongratz, and BLACOH Fluid Control. This experience makes her an invaluable asset to Harvest.

Ms. Carragher's experience with regulatory bodies and government agencies includes HIPAA, employment law, the Affordable Care Act, the Family Medical Leave Act, Equal Employment Opportunity reporting, the Employee Retirement Income Security Act, the Americans with Disabilities Act, COBRA, the National Labor Relations Board, and the Department of Labor. As an HR professional, she has maintained compliance with these agencies through policy, procedure, and employee handbook development; benefits and enrollment guidance; employee training; and performance management.

Since joining Harvest in 2016, Ms. Carragher has managed medical cannabis regulatory requirements in six states and dozens of local municipalities, where she analyzes and modifies compensation and benefits policies; advises management on equal employment opportunity and

sexual harassment regulations and best practices; manages staffing strategies and duties, including hiring, training, performance evaluation, and termination; maintains and analyzes personnel-related data; ensures HR and employment compliance on local, state, and federal levels; and establishes internships with surrounding colleges/universities to attract promising recent graduates to the medical cannabis industry. For example, in Pennsylvania, she and others from Harvest's HR department attended Delaware Valley University's career fair, where they spoke to many students about the careers available within the medical cannabis industry. She is also a member of the Diversity Leadership Alliance, a diversity education organization in Arizona, and is a Society for Human Resource Management Senior Certified Professional.

Most recently, Ms. Carragher has developed and implemented The Harvest Way, an HR initiative designed to perpetuate a culture of empowerment, truth, and perseverance throughout the organization. This initiative encourages employees to be Genuine, Dedicated, Impactful, and Accountable through team-building, employee exchange opportunities, and by incorporating those four Core Value throughout day-to-day work goals and activities.

Mr. Paul Nowack graduated summa cum laude from Arizona State University in 2002 with a degree in Construction Management and Engineering. After, he worked for Gilbane, one of the nation's largest builders of biotech research and pharmaceutical manufacturing facilities, for four years. He later co-founded a design-construction firm in 2005, Waltz Construction, where he served as Vice President and operations manager for 11 years. Along with Steve White, he is a founding member of the original Harvest entities.

Mr. Nowack has 17 years of experience building pharmaceutical and research facilities. Examples include the State of Arizona Health Laboratory, the Interdisciplinary Science and Technology Building at Arizona State University, the Interdisciplinary Research Facility at the University of Arizona, and the Physical Science F Wing at Arizona State University. These facilities were designed and constructed to comply with CDC Biosafety Level 3 laboratory requirements, ISO certified clean room regulations, and State-regulated security access and controls, and to contain and prevent the emission of dust, fumes, vapors, and odors into the environment. Mr. Nowack is also LEED Accredited and integrates eco-conscious practices in his design and construction work, including green building, water conservation, air quality control, and energy efficiency.

Mr. Nowack has applied his experience to the design and construction of state-of-the-art medical cannabis facilities, including six retail dispensaries in Arizona ranging from 1,300 ft<sup>2</sup> to 6,800 ft<sup>2</sup>, two in Nevada, one 3,500 ft<sup>2</sup> and one 3,000 ft<sup>2</sup>, a 3,000 ft<sup>2</sup> dispensary in Illinois, a 5,600 ft<sup>2</sup> dispensary in Maryland, and a 2,500 ft<sup>2</sup> dispensary in Pennsylvania. Designing and building these facilities has required strict compliance with state, county, and local rules and regulations, including dozens of inspections and audits conducted by officials, such as, geotechnical inspections, phase 1 environmental studies, structural inspections, city and county construction inspections, fire inspections, planning inspections, third-party equipment commissioning and inspections, final building inspections, and health department inspections.

Mr. Sean Berberian has practiced business litigation and transactional law for over 18 years. While at Hastings College of the Law, he worked as an extern for the Chief Judge of the United States District Court for Northern California. After graduation, Mr. Berberian was first employed in San Francisco at Shook Hardy & Bacon and then in Arizona at Stinson Morrison Hecker, becoming the youngest partner in the Phoenix office. There, Mr. Berberian practiced civil litigation, including cases before the U.S. Supreme Court and the 9<sup>th</sup> Circuit Court of Appeals. Sean later joined Steve White to form White Berberian and expand his practice to include business transactions and regulatory work.

After representing Harvest as outside counsel for several years, Mr. Berberian joined Harvest as general counsel in April 2017. Mr. Berberian's practice has included regulatory compliance before and litigation against various administrative agencies, including the Arizona Department of Health Services, Maryland Medical Cannabis Commission, Maricopa County Flood Control District, Maricopa County Sheriff's Office, and Maricopa County Correctional Health Services.

Throughout Mr. Berberian's career, he has been committed to performing pro bono services for clients who cannot afford legal counsel. Mr. Berberian has also volunteered for the Volunteer Lawyers Program in Maricopa County, has been a member of the U.C. Hasting Alumni Mentor Program, mentoring students and new lawyers, and has also volunteered with the Men's Arts Council of the Phoenix Art Museum.

Mr. Berberian's passion for Harvest does not stop with his belief in and support of its business and people. Mr. Berberian is also a true believer in the medical benefits of cannabis. In addition to hearing many accounts of parents whose children whose lives have dramatically improved because of cannabis treatment, Mr. Berberian has also experienced great personal success in post-surgical recovery through the use of CBD extracts and truly believes that cannabis medication should be available to all patients who need it.

Mr. Timothy Buskirk graduated from Maryland's Western Police Academy in 2002. He has over 15 years of experience as a police officer, including 10 years as a Chief of Police for the town of Hancock, Maryland. As a police officer, he completed the following specialized training courses:

- Search and Rescue/Search Manager School
- Criminal Street Gang School
- First Line Supervisor School
- Taser Certification
- Certified Narcotic Detection
- First Aid, CPR, and AED Certifications
- Defensive Tactics Training
- O.C. Spray Training
- Judgmental Decision Training
- Crisis Intervention Training

As police chief, Mr. Buskirk was responsible for the 24-hour security and monitoring of the entire town of Hancock, Maryland. There, he supervised law enforcement patrols, apprehended criminals, ensured public safety during town events, responded to building alarms and emergency calls, and designed and implemented the town's downtown surveillance and monitoring system. He is also a two-time winner of Washington County's Life Saving Award for saving the life of another by providing essential medical treatment prior to arrival of emergency medical services personnel.

Mr. Buskirk entered the medical cannabis industry after his father's passing from cancer. His father had difficulty with the chemotherapy and radiation treatments, and Mr. Buskirk wondered privately if medical cannabis might have helped ease his pain in his final days. He decided he wanted to protect the products and the people that make them, so others can benefit from cannabis.

For Harvest, Mr. Buskirk oversees all aspects of safety and security. He has developed and implements Harvest's safety and security policies and standard operating procedures, oversees risk assessment and crisis management, and trains management and staff on how to respond to potentially life-threatening situations. To prevent product theft and diversion, in addition to extensive inventory management and surveillance protocols, Mr. Buskirk has implemented internal controls such as the Lobby Guard system, which logs and tracks visitors within Harvest's large-scale facilities. Mr. Buskirk also builds relationships with local law enforcement and emergency response personnel to seek consultation on security systems and protocols and facilitate rapid response in the event of an emergency.



## EXPERIENCED OWNERS

### Beth Stavola

Ms. Beth Stavola is a female entrepreneur, Chief Operating Officer and Board Member of MPX Bioceutical Corporation, the Founder and CEO of Stavola Medical Marijuana Holdings, Health for Life Inc, GreenMart of Nevada, and CBD For Life, and a mother of 6 children. In 2017 Cannabis Business Executive named Ms. Stavola #3 on the "CBE 75 Most Important Women" in cannabis list. She runs a thriving cannabis business, which includes processing, growing and dispensing operations throughout Arizona, Nevada, Maryland, and Massachusetts.

The current overall operation consists of two Dispensary licenses, two Production licenses, and four Cultivation licenses in the state of Arizona operated under the Health for Life brand; as well as three medical marijuana licenses in Las Vegas, Nevada under the GreenMart of Nevada brand. In the last year the company has expanded to Maryland managing three dispensary licenses under the Health For Life brand and one production license under MPX, as well to Massachusetts with a fully integrated grow, production and dispensary license. Her beauty and wellness brand CBD For Life provides customers with the benefits of cannabinoids while avoiding unwanted psychoactive effects and can be sold throughout the country.

Ms. Stavola has successfully established the Health for Life brand from inception to significant sales/cash flow within 5 years time and maintains one of the most stellar compliance records in the state of Arizona, receiving a 100% score on the last several state compliance audits. Given this record, Ms. Stavola was able to establish a banking relationship for the business, which is not an easy feat in this industry. Health for Life is one of the most recognized brands of cannabis dispensary, cultivation, and processors in Arizona. Ms. Stavola is also the owner of Melting Point Extracts (MPX), which has become an extremely well respected and sought after brand in Arizona and Nevada. MPX recently won the Phoenix New Times Best Concentrates of 2016 and the 2016 Jack Herrer Cup in Las Vegas. They specialize in hydrocarbon, CO2, and solvent-less extractions to offer a wide and diverse selection of high quality cannabis concentrates.

In February 2015, Ms. Stavola launched CBD for Life, a company that produces highly innovative, natural, luxurious, and effective Cannabidiol (CBD) infused pain management and beauty products using 99% pure CBD extract derived from stems and stalks of industrial hemp. She learned about the wonderful healing properties of CBD after she infused the amazing compound with essential oils to create a rub that would help manage her chronic back pain caused from scoliosis of the spine, a condition she suffered with since her early teenage years. As a wonderful side effect of using the rub, Ms. Stavola noticed a significant improvement, clearing and softening of her skin. After months of extensive research she and her team met with a chemist to create the luxurious formulations, and two years later CBD for Life was born! CBD for Life is headquartered in New Jersey where the products are produced in a large-scale contract manufacturing facility. All products are 95% naturally derived and are free of GMO's, parabens, phthalates, formaldehyde, artificial coloring and are never tested on animals. Rave reviews from mainstream prominent beauty publications and bloggers and client testimonials have been flooding in since the launch. Her products in mainstream media are helping in educating the beauty and health world on the healing properties of cannabis.

Ms. Stavola is also founding partner of GEM, the German Extraction Method, where she participated in a pilot project growing hemp in Germany and processing out the THC, leaving pure CBD which can be used in so many beneficial ways. Her company CBD For Life has participated in multiple important CBD research conferences including the CannaTech conference in Israel, which was created to help accelerate cannabis research and innovation.

Ms. Stavola holds the esteemed honor of being named as one of the leading medical cannabis expert entrepreneurs on the floor of the House of Representatives in 2014 by Congresswoman Dina Titus. She holds a BS in Finance and Economics from Monmouth University and spent most of her Wall Street career at Jefferies and Company. The medical cannabis business was an investment initially that transformed into her life's true passion to holistically help others and create a lucrative business at the same time. Women-owned and operated businesses are the minority in the cannabis industry and Ms. Stavola continues to sponsor organizations promoting and elevating women in this industry including the Women in Business section of the 710 Chronicle. Ms. Stavola resides in New Jersey with her beautiful family and is proud to be the mother of 6 children.

Ms. Stavola has just won the coveted Baltimore County, MD dispensary license and plans to open by the end of 2017. Future expansion plans include Pennsylvania in 2017 and continued ongoing analysis for new state growth.

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#### Sharon Wright

Sharon Wright has been a member of the community since 1981 and has dedicated to participating in local government to help Santa Rosa achieve success. Sharon Wright is an exemplary citizen of Santa Rosa with years of experience contributing to local charities and participating in local government on a leadership level. She has received many awards for her hard work and dedication to the community including the 2008 "Jewel of a Woman" award by the Girl Scouts of Northern California for her outstanding service and commitment to the community. She chaired the first Small Business Committee for the California Chamber of Commerce where the Paul Revere Network was formed that linked members of local chambers of commerce throughout the state to legislators in both the Assembly and Senate.

From 1995 to 1998 and 2002-2004 Sharon was Santa Rosa's mayor. She was the top vote getter in all three elections and the first council member in the history of the city to be selected to succeed themselves and served an unprecedented three terms as mayor. She initiated the first economic development program for the City of Santa Rosa creating 500 jobs and thousands more over the years. She oversaw the creation of the Neighborhood Revitalization Program in the City of Santa Rosa bringing the public and private sector together to create funding mechanisms and programs for residents to reclaim their blighted neighborhoods.

Sharon currently sits on the following boards: Santa Rosa Memorial Hospital Board of Trustees, Habitat for Humanities of Sonoma County, Sonoma County Alliance (she has been the director for 14 years and was named first life honorary member in 2005), and the Leadership Santa Rosa Alumni Association. Since 2005 Sharon has assisted members of

the community in strategic execution of business expansion plans through her company Wright Consulting.

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#### Monica Hesz

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Mrs. Monica Hesz, a native of Sonoma County, is an owner of Harvest of Santa Rosa, LLC and has extensive managerial experience with local Northern Bay Area experience totaling over fifteen years. In 2016 Monica entered the cannabis industry opening Revolution Emporium in Ukiah. Partnering with a group of friends and family they set out to build a trusted brand to serve their community that they call home. With her management experience Monica quickly helped develop their dispensary into a patient and community focused local business to provide the best products and education to their patients. Growing up the eldest daughter in a hardworking local Bay Area family, Mrs. Hesz learned the values of hard work, sacrifice, and leadership at a young age. As a child, she regularly helped her family with her siblings while helping support the family.

After graduating from Healdsburg High School, Monica began working for a medical device company. She soon married and began her career as a mom while continuing to work. Through personal drive and ambition, she was promoted into management. She was responsible for a myriad of supervision duties. In this role she learned to hone her leadership skills that translated over to being a caring and giving mother and a partner Revelation Emporium.

In her family life her and her husband Ian wanted to do more. They became emergency foster parents and ended up adopting one son while having three children of their own. They also run a local nonprofit food booth where they provide hand dipped corn dogs for local organizations giving back to back to their community.

With dedication to her family, community and her drive to help others combined with her cannabis management experience Monica makes a tremendous addition to the Harvest team.

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#### ADVISORY BOARD

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Harvest of Santa Rosa will also utilize the extensive expertise of its experienced and dedicated Advisory Board members to ensure we fulfill our commitments to our patients, customers, community, and employees.

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#### Dr. William Troutt, Medical Education Advisor

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Dr. Troutt graduated magna cum laude from Arizona State University in 1999, earning a bachelor's degree in Biology. In 2004, he graduated from the Southwest College of Naturopathic Medicine, specializing in botanical and natural medicines.

Dr. Troutt has worked exclusively in the cannabis industry since the passage of the Arizona

Medical Marijuana Act (AMMA) in 2010, providing him with extensive experience in cannabis education. He was the first medical director of a State-licensed dispensary in Arizona and has trained medical cannabis employees since 2012. He currently serves as the medical director for seven Arizona dispensaries and as director of medical education for two Nevada dispensaries, which requires that he develop all medical protocols, provide cannabis training to every employee, and develop education materials.

Since 2010 Dr. Troutt has consulted with thousands of medical cannabis patients, providing him with extensive practical experience in the application of cannabis-based medicine. He has also conducted dozens of patient-focused lectures on the history of cannabis use for medical purposes; medical cannabis varieties and uses; and medical cannabis use for epilepsy, seizure disorders, cancer, inflammation, chronic pain, and the senior population. In addition, he has given many formal lectures:

Medical Cannabis and the Senior Population; Keynote speaker at a conference held by the Assisted Living Federation of America, 2014

Medical Cannabis and PTSD; Science of Cannabis Summit, 2015

Medical Cannabis and Seizure Disorders; Presentation given at the Mayo Clinic, 2015

Medical Cannabis and the Senior Population; Annual Conference of the Non-Medical Home Care Association, 2015

Cannabis Therapy for Cancer; Presentation given at Ironwood Cancer Center, 2015

Medical Cannabis: History, Research, Dosage, and Modalities; Nevada Health Occupations Students of America Future Health Professionals Symposium, 2016

Cannabis for Pediatric Conditions, Cannabis Seminar for Physician Continuing Education; Southwest College of Naturopathic Medicine, 2016

Cannabis and Seizure Disorders in Adults; Adult Epilepsy Medical Symposium, 2016

Medical Cannabis for Palliative Care During Cancer Treatment; Grand Rounds, Banner MD Anderson Cancer Center, 2017

He also serves as the Executive Director of Harvesting Hope, providing free guidance on the use of medical cannabis for treating childhood seizure disorders to over 100 families.

In 2014, Dr. Troutt co-founded the Medical Marijuana Research Institute to conduct research on the potential health benefits of medical cannabis. To date, he has first-authored two studies. The first, published in the *Journal of Psychoactive Drugs*, surveyed Arizona patients, examining their medical cannabis use, perceptions of its efficacy, and their experiences using cannabis medicinally before and after cannabis legalization. The second, published in the *Journal of Alternative and Complementary Medicine*, examined the carcinogenic byproducts of vaporizing common thinning agents used in medical cannabis vapor products (e.g., cartridges containing cannabis oil).



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#### David Welch, Compliance Advisor

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Mr. David Welch studied law at the Loyola Law School in Los Angeles. After graduating in 2007, he founded a boutique law firm, D|R Welch Attorneys at Law, which specializes in the cannabis industry. Over the past 10 years, he has represented over 300 cannabis companies, including 75% of the Pre-ICO dispensaries in Los Angeles. He advises on compliance with State, county, and city rules and regulations, providing services for organizations during facility start up and "midstream" to correct compliance violations for companies with existing operations. In 2015, D|R Welch Attorneys at Law was named a Top 25 Boutique Law Firm in California by the Los Angeles Daily Journal for David's work in the cannabis industry. Mr. Welch was also named an Intellectual Property Trailblazer in 2016 by the National Law Journal and a Southern California Super Lawyer in 2018. He is also a partner at Greenberg Gross LLP, where he chairs the cannabis litigation practice group.

Mr. Welch has litigated cases at all court levels, including the 9<sup>th</sup> Appellate Circuit Court and the California Supreme Court. His regulatory expertise is sought not only by business owners but also local municipalities, as he has participated in the cannabis ordinance drafting process for several cities throughout California, including social equity components that increase license accessibility for individuals of low income and with past minor drug offenses.

In addition to his legal work, Mr. Welch founded and manages a nonprofit organization in Los Angeles, Operation Re-Hire, which provides pro bono legal and social services to non-violent drug offenders, enabling them to more easily reenter the workforce and thereby reduce the likelihood of recidivism.

Mr. Welch's cannabis regulatory experience and work as a government affairs adviser at both state and local levels has given him an unparalleled level of experience, which he will bring to his position as our Compliance Advisor. For the proposed dispensary, Mr. Welch will consult on matters related to regulatory and operating compliance, ensuring the dispensary maintains conformity with City of Santa Rosa and California State laws, rules, and regulations.

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#### Morris L. Thomas, Employment Diversity Advisor

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As a child in Bessemer, Alabama, Mr. Thomas was steeped in the Civil Rights Movement during the 1950s and 1960s. His father was president of the NAACP and worked closely with Dr. Martin Luther King, Jr., and like many other civil rights leaders lived under a constant threat of violence. As protection, Mr. Thomas and his brothers lived for a time in Massachusetts, away from their family. Later, back in Alabama, Mr. Thomas' school was integrated under armed guard. These experiences, among many others, influenced Mr. Thomas as an adolescent and young adult,



ultimately instilling in him the importance of equality in all areas of life, including one's employment.

A graduate of the University of California, Los Angeles School of Law, Mr. Thomas was the first judicial law clerk for the Honorable Consuelo Marshall, the first Black female on the Federal District Court in California. After many years as an attorney, he joined Santa Clarita's local newspaper, the Signal, in 2000. After advancing to District Manager of the circulation department, Morris was confronted with a transition occurring in the carrier force from mostly White carriers to nearly 90% Hispanic. Despite reluctance from upper management, Mr. Thomas understood the importance of minority, Spanish-speaking managers to ensure efficient paper delivery, and took it upon himself to select and train promising individuals for managerial roles. As he advanced through the Signal from Administrative Director to Publisher of the Business Journal, to Interim Publisher, and finally to General Manager, Mr. Thomas continued to hire, promote, and train minority employees for key positions within the company.

As our employment diversity advisor, Mr. Thomas will advise on best practices to attract, retain, and develop a diverse workforce for the dispensary. He will facilitate relationships with local organizations and institutions that serve diverse populations, advise on in-house diversity-oriented programs, and recommend mentorship and training strategies to develop promising minority and female employees.

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#### AMERICANS FOR SAFE ACCESS PATIENT FOCUSED CERTIFICATION

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Harvest currently operates two (2) Medical Retail Facilities that have received a "Patient Focused Certification" through the organization Americans for Safe Access (ASA). Americans for Safe Access is the premier organization for patient safety and advocacy. This prestigious organization trains doctors and registered qualifying patients on the use of medical marijuana. Patient Focused Certification (PFC) is a program that patients, healthcare providers, companies, and regulators can depend on to identify reliable medical cannabis products and services. The certification program is based on the new high-quality standards for medical cannabis products and businesses that is issued by the American Herbal Products Association (AHPA) and the American Herbal Pharmacopeia (AHP) Cannabis monograph.

To obtain the certification, Harvest conducted extensive employee training, completed a facility audit, participated in product testing, made suggested corrective actions, and audited all records. Harvest will obtain certification for the Santa Rosa Retail Facility and continue to uphold the programs objectives. A primary objective of PFC is that Harvest will emphasize at the Santa Rosa Retail Facility is educating employees in the areas of protocols and procedures in all operations with an emphasis on both regulation and best practice.

## DIVERSITY PLAN OVERVIEW

At Harvest, our strength as a company is and will be defined by the opportunities created for everyone, especially people of color, veterans, women, the LGBTQ community, and other disadvantaged or underrepresented communities. This means harnessing California's rich and diverse heritage and putting policies and procedures in place to ensure Harvest will help make the legal cannabis industry as accessible and beneficial for the disadvantaged and underrepresented as it has been for primarily white, wealthy, male-dominated businesses in other states. Harvest recognizes that diversity enrichment and inclusion should reach the executive and ownership levels of an organization, which is why Harvest is proud to have Ms. Stavola and Ms. Blazeovich, two incredible female entrepreneurs as owners, and Mr. Contreras a local Hispanic owner. Harvest will foster an environment where personal identity, heritage, race, gender, language, age, and military service are recognized as assets and those assets are celebrated, respected, and valued. To meet these commitments, Harvest has developed a strategic Diversity Plan that will guide our principles, decisions, and actions, both as an organization and as representatives of Harvest.

## The Employment Diversity Advisor

As our employment diversity advisor, Mr. Morris Thomas will advise on best practices to attract, retain, and develop a diverse workforce for the dispensary. He will facilitate relationships with local organizations and institutions that serve diverse populations, advise on in-house diversity-oriented programs, and recommend mentorship and training strategies to develop promising minority and female employees. Mr. Thomas will oversee the development and implementation of our diversity policies and practices. He will be responsible for setting goals, implementing strategies, and analyzing metrics of success.

With respect to setting metrics to measure minority and veteran participation in our workforce and vendor partnerships each financial quarter, the Employment Diversity Advisor will produce a report that analyzes the backgrounds of employees in the company. The analysis will show what percentage of those positions are filled by target underrepresented or disadvantaged populations. If the analysis indicates persons from underrepresented or disadvantaged populations do not make up a satisfactory proportional share of the workforce, the team must develop new strategies to obtain this goal.

## BUSINESS PLAN

It is with great pride in our company, and what we stand for, that Harvest presents the following proposal for a combined Medical and Adult-Use Retail Facility with Delivery Services. In this Section, we will describe the operating hours and days of the week when patients and customers can visit Harvest as well as the estimated number of employees that

will assist and create meaningful and life-enhancing experiences for those individuals.

#### HOURS OF OPERATION

Harvest's dispensary facility will be open to the public a minimum of forty (40) hours per week. Hours of operation will be compliant with the rules set forth by the Bureau, the City of Santa Rosa, and all other applicable state and local laws, regulations, ordinances, and other requirements, including all zoning regulations. Harvest will be open for the sale of cannabis goods solely between the hours of 8:00 a.m. PST to 9:00 p.m. PST, unless an alternative time frame is established by the local and state cannabis authorities.

Whenever the Facility is not open for retail sales, the premises will be securely locked with commercial-grade, non-residential door locks and will be equipped with an active alarm system, as discussed in the Security section of this application. All cannabis goods will be stored in a locked, fire-proof vault within the secure storage room in a limited access area of the dispensary facility. Only authorized employees and contractors will be allowed to enter the Facility after hours, except in emergency circumstances.

#### DESCRIPTION OF HOURS AND DAYS OF THE WEEK THE FACILITY IS OPEN TO THE

Harvest will be open seven (7) days a week for the sale of cannabis goods for at least eight (8) hours per day in compliance with all applicable zoning requirements. Harvest's operating hours will be between 8:00 a.m. PST to 9:00 p.m. PST from Monday to Friday, and 9:00 a.m. PST to 8:00 p.m. PST on Saturday and Sunday. These hours will change if an alternative time frame is established by the local and state cannabis authorities. Harvest will conspicuously post the hours of operation at the public entrance to the Facility. All patrons and employees will be escorted out by a Security Guard prior to closing.

#### ESTIMATED NUMBER OF EMPLOYEES (AT START-UP AND AT FULL BUILD OUT)

Harvest is committed to maintaining a sufficient number of employees possessing the skill-sets and experience needed to ensure the success of all aspects of our retail operations. At start-up, the estimated number of employees is twenty-five (25). We will begin the hiring process as soon as our permit is received. Training for employees will begin during start-up and throughout build-out to ensure the Harvest dispensary facility opens as soon as possible and no later than 6 months from the time we receive our permit. Our construction and design team has phased out the build-out to take an estimated ten (10) weeks, as described in the Site Plan portion of this application. At the time of full build-out, the estimated number of employees is twenty-five (25) individuals, not including the internal Security Guards and our valued Advisory Board. At least six (6) of these jobs will be full time positions. Harvest will not hire any person that is ineligible under state or local law or company policy. Harvest requires that all staff be twenty-one (21) years of age or older.

Harvest encourages employee development and empowerment. We intend on fostering an environment where personal identity, heritage, race, gender, language, age, and military service are recognized as assets and those assets are celebrated, respected, and valued. Employees are encouraged to provide input and suggest new policies and processes on a regular basis.

In addition, due to the highly regulated and security intensive nature of its operations, Harvest utilizes a unit-based reporting structure to ensure compliance with all laws and regulations.

Employees and consultants are assigned to a specific unit to ensure oversight. There is no policy against working in more than one (1) unit, however, the Director of the assigned unit is responsible for managing their employees or consultants. For example, the Retail Manager supervises staff assigned to a specific retail department. The Chief Operating Officer and Director of Retail Operations will oversee the retail operation as a whole.

Harvest's organizational chart identifies prospective positions at Harvest and depicts the reporting structure that provides internal accountability. Detailed descriptions of specific positions can be found below.

## POSITIONS, RESPONSIBILITIES, AND QUALIFICATIONS

### *Chief Executive Officer*

The Chief Executive Officer ("CEO") provides leadership in achieving the Harvest vision, mission, strategy, and annual goals. The CEO is responsible for leading the Management Team, initial staffing, communicating and cooperating with the Bureau and the City of Santa Rosa. The CEO, with the help of the neighborhood liaison, is also responsible for the development of strategic communications strategies and representing Harvest at events and activities that involve interaction with customers, the public, the media, and employees. The CEO builds and sustains the company's reputation for quality, reliability, and consumer satisfaction, approves press releases, and oversees all communication sent to the public and, when necessary, the Bureau, the City of Santa Rosa, State and local law enforcement and any other applicable governmental entities. Other responsibilities include managing the Harvest's brand and reputation.

### *Neighborhood Liaison*

The Neighborhood Liaison is a resident of Santa Rosa and will be responsible for assisting the CEO, Director of Security and Advisory Board members in organizing and carrying out the ongoing public information program to inform City residents of cannabis issues and proper/safe/legal use of cannabis products. The Neighborhood Liaison will also prepare a schedule for communication and receiving feedback from all entities within 300 feet of the business at least two times a year. The Liaison will be essential in developing a process and schedule for at least two public outreach meetings per year that meet City approval. This includes working with the City and the CEO to ensure the meetings are productive and exceed local standards. Responsibilities will entail preparing meetings and relevant materials, as well as developing a plan to address all neighborhood feedback.

### *Chief Operating Officer*

The Chief Operating Officer ("COO") reports to the CEO and is responsible for day-to-day operations and the development, design, operation, and improvement of the systems that create and sell Harvest's cannabis products to consumers and to ensure quality and compliance in all aspects Harvest's operations, as well as all aspects of safety and security. The COO is responsible for driving performance measures for the operation (including a consideration of efficiency versus effectiveness), often in the form of dashboards convenient for review of high-level key results indicators. The COO also oversees the information technology strategy for Harvest, as well as develops and implements the policies and goals for all teams using selected technologies.

### *Controller*

The Controller provides both operational and programmatic support to the organization. The



Controller supervises the finance unit and is the chief financial spokesperson for the organization. The Controller reports directly to the CEO and directly assists the COO on all strategic and tactical matters as they relate to budget management, cost benefit analysis, forecasting needs, and the securing of new funding.

#### *Director of New Development*

The Director of New Development provides both operational and programmatic support to the organization. The Director of New Development supervises the build out and implementation of new programs. The Director of New Development reports directly to the CEO and directly assists the COO on strategic program management matters as they relate to organizing, developing, and implementing new programs.

#### *General Counsel*

The General Counsel will provide guidance on internal corporate, licensing, and compliance matters to assist with daily operations.

#### Human Resources Positions

##### *Director of Human Resources*

The Director of Human Resources of Harvest reports to the CEO and is responsible for supervising and providing consultation to management on strategic staffing plans, compensation, benefits, training and development, budget, and labor relations. The Director of Human Resources will work closely with the Controller. Harvest's Director of Human Resources will also take a leadership role in developing a culture that enables Harvest employees to perform in accordance with the organization's objectives. Harvest's Director of Human Resources supervises staff and will report to the CEO and the Controller on issues regarding implementation of policies and procedures, safety of the workforce, recruiting and hiring high-performing, diverse employees, and labor, legislative, and other human resources issues.

#### Security Positions

##### *Safety and Security Compliance Director*

The Safety and Security Compliance Director reports to the CEO and will oversee the installation and operation of security systems, ensure compliance with all rules and regulations, and supervise Security Guards in Harvest dispensary facility, as well as ensure safety protocols for visiting customers and all cannabis goods moved within the dispensary facility. The Safety and Security Compliance Director is responsible for all security-related matters and will work closely with retail management to ensure security protocols are being followed.

##### *Security Guards*

Harvest will enter a contract with a private patrol operator who will furnish Security Guards to secure and protect the retail operation. At least two Security Guards will be on the Harvest dispensary facility premises during all hours of operation. Security Guards must comply with all applicable provisions of Chapter 11.5, Division 3 of the California Business and Professions Code (BPC) and all other applicable state and local laws and regulations. All security guards will hold a valid registration card from the Bureau of Security and Investigative Services and complete mandatory training. The registration card must be held on their person while on duty.



Security Guards will comply with the requirements of the State of California and City of Santa Rosa and maintain an active American Red Cross first-aid card. The Security Guards will report to Safety and Security Compliance Director. The Security Guards are responsible for securing access points, authorizing entrance to Harvest dispensary facility, monitoring surveillance footage, maintaining control of the premises, providing immediate on-site response in the event of a security threat, and other security-related tasks as directed by the Safety and Security Compliance Director.

#### Retail Positions

##### *Director of Retail Operations*

The Director of Retail Operations reports to the COO. The Director of Retail Operations is responsible for supervising all phases of retail operations and ensuring compliance with local and state law regarding cannabis retail operations, including inventory controls, inventory monitoring, and ensuring the retailer's strategies, policies, and procedures are properly implemented. The Director of Retail Operations will also work closely with the Retail Manager and Medical Director to develop educational and training materials for consumers and the community. Responsibilities also include training retail personnel, developing and overseeing implementation of retail standard operating procedures, and monitoring day-to-day retail operations for non-compliance. The Director of Retail Operations must be appropriately trained for the position and have at least five (5) years of experience in retail operations, management, or other related fields.

##### *Retail Managers*

The Retail Managers report to the Director of Retail Operations. The Retail Managers will oversee all phases of receiving, storing, and selling cannabis and cannabis goods. The Retail Managers will plan, organize, and control day-to-day retail operations to ensure industry standards are exceeded and ensure that cannabis goods are acquired, stored, handled, displayed, sold, and delivered efficiently and to internal, state, and local standards. The Retail Managers will oversee the Wellness Representatives.

##### *Wellness Representatives*

The Wellness Representatives report to the Retail Managers. The individuals who fill Wellness Representative roles will be the face of the storefront operation and critical players in cultivating consumer loyalty and satisfaction. Wellness Representatives will work primarily in the retail area of the dispensary facility and will provide assistance to consumers who enter the store to make a purchase. Wellness Representatives must have excellent interpersonal communication skills, expertise regarding a range of different cannabis goods and consumption methods, an upbeat demeanor, and the ability to carry out a regulated transaction in full compliance with all applicable laws and regulations while creating a fun experience for the consumer. Appropriate training will be provided to ensure those skills are met. Wellness Representatives will be responsible for making sales, stocking the displays in the retail area, securing inventory in the vault at close of business, carrying out opening and closing procedures, maintaining a clean and welcoming retail environment, and all other tasks as directed by the Retail Manager or Director of Retail Operations. Prior retail experience preferred, but not required. Professional appearance and outgoing nature required.

##### *Facility Manager*

The Facility Manager reports to the COO and will oversee the functioning of building systems

including mechanical, electrical, fire/life safety, and elevators, as well as manage the maintenance of buildings and grounds. The Facility Manager will also oversee all contractors throughout Facility renovation projects entailing HVAC, electrical systems, and retail area layout.

#### *Inventory Manager*

At Harvest, the Inventory Manager has the responsibility of keeping and protecting inventory from damage, theft and loss as well as performing inventory counts. The Inventory Manager is responsible for ensuring that incoming product is receipted and managed appropriately according to Harvest procedures, ensuring materials are ready and available for production as and when required, and accuracy of the inventory. The Inventory Manager oversees the proper and timely ordering and retail of all products, merchandise, and office supplies at all locations. The Inventory Manager executes inventory procedures using the Harvest's seed-to-sale software and the statewide track and trace system and responds to any discrepancies by notifying management and investigating reasons for the discrepancy. The Inventory Manager also supervises and coordinates activities of workers engaged in verifying and keeping records on incoming shipments. The Inventory Manager will work with the Deliver Manager to coordinate and ensure all deliveries are appropriately carried out and proper inventory is maintained to meet patient and consumer demand.

#### *Delivery Manager*

The Delivery Manager works closely with the Retail Manager and Inventory Manager to arrange deliveries to qualified consumers. This position is responsible for facilitating deliveries to consumers by working closely with the Safety and Security Compliance Director. The Delivery Manager ensures the Delivery Drivers follow all delivery, tracking, recordkeeping, and security procedures that are pertinent to cannabis delivery. The delivery manager will also work with the Director of Security and local law enforcement to ensure all risk involved in the delivery of cannabis goods is mitigated to the greatest extent possible.

#### *Delivery Drivers*

The Delivery Drivers are responsible for the safe movement of cannabis products between the licensed cannabis retail premises and consumer addresses. This position is supervised by the Delivery Manager. The Delivery Drivers are responsible for preparing delivery orders, loading and unloading cannabis products, securely moving products between approved locations, generating sales receipts (if authorized), maintaining delivery records, and operating and maintaining the delivery vehicle(s). Each Delivery Driver must be at least twenty-one (21) years of age and hold a valid driver's license.

## INVENTORY RECORDS AND DIVERSION PREVENTION

The Harvest team has over six years of experience tracking and securing medical cannabis and maintaining relevant records. We have successfully implemented an inventory tracking system in two states, tracking thousands of products throughout cultivation, processing, and dispensing. Our experience in inventory management has informed our tracking processes and seamlessly integrating MJ Freeway, our internal point of sale and tracking system, into METRC, which is California's chosen inventory tracking system. This allows us to produce real time records of all product in the store and what has been dispensed.

Harvest has comprehensive inventory management procedures, which are compliant with the rules set forth by the California Department of Consumer Affairs' Bureau of Cannabis Control ("the Bureau"), the Santa Rosa City ("the City") Council Ordinance 2017-025, and all other applicable state and local laws, regulations, ordinances, and other requirements. These procedures will ensure strict control over Harvest's cannabis and cannabis product inventory from transport by a licensed distributor to sale/delivery to a consumer, or disposal as cannabis waste. Inventory management procedures will also include measures to prevent contamination and maintain the safety and quality of the cannabis goods dispensed at Harvest's Retail Facility. Harvest understands its responsibility to the greater community and the environment and is committed to providing consumers with a safe, consistent, and high-quality supply of cannabis goods.

The Inventory Manager will be responsible for determining the appropriate level of cannabis input material and finished product needed to satisfy the projected needs of the consumers that Harvest serves. These projections will in turn guide sales and acquisitions of cannabis goods.

Two (2) inventory tracking systems will be employed in concert to maintain an accurate accounting of the status, location, movement, and ultimate disposition of all cannabis inventory that comes onto the licensed retail premises. These electronic accounts of inventory will be reconciled daily and confirmed periodically with physical inventory counts to ensure no inventory discrepancy goes unnoticed. Inventory discrepancies will be promptly investigated and, when appropriate, reported to relevant authorities as described in this narrative.

## INVENTORY MANAGEMENT

Harvest's comprehensive inventory management procedures will be compliant with the rules set forth by the Bureau, the City, and all other applicable state and local laws, regulations, ordinances, and other requirements. This includes, but is not limited to, complying with all state and city regulations regarding testing, labeling and storage of all cannabis products. These procedures will ensure strict control over Harvest's cannabis goods inventory from delivery by a licensed distributor to the sale or delivery to a consumer or the disposal as cannabis waste. Harvest's Inventory management procedures will also include measures to prevent contamination and maintain the safety of the products.

The Inventory Manager will implement and enforce all inventory management policies and procedures. The Retail Manager or supervisor on duty will ensure accurate recording of all inventory transactions in their department. The Inventory Manager will make all necessary changes to procedures and retrain employees immediately upon discovering a problem in inventory management procedures.

## Product and Inventory Storage

All cannabis inventory, except for limited amounts of cannabis, limited to only an amount necessary to provide a visual sample for customers, as used for display purposes, samples, or immediate sale, will be stored in a fire-proof vault within the secure storage room, a limited access area of the dispensary facility, to prevent diversion, theft, and loss during non-business hours. No cannabis product display or storage will be visible from the exterior of the business. When the dispensary is open, a limited amount of product will be moved from the vault to a restricted access area behind the sales counter in locked cabinets. Cabinets may be unlocked using an employee specific keycard. Accessing the cabinets via keycard allows the Director of Security to track which employee accessed which product at what time. This is an additional layer of security and accountability. All product available for display will be behind the sales counter, out of reach from customers, in the restricted access area. All cannabis goods displays, points of sale and product storage cabinets will be on video surveillance. All areas where cannabis, cannabis products, and devices will be stored will be dry, well-lit, well-ventilated, and maintained in a clean and orderly condition.



The fire-proof vault used for secure storage of cannabis goods and, if applicable, cash will be bolted to the floor within an access-controlled secure storage room in a limited access area of the Facility. The vault will be Underwriter's Lab (UL) approved, with a fire rating that is at minimum 2-hour 1700 degrees Fahrenheit. Access to the vault will be limited to the minimum number of authorized personnel for efficient operations. Harvest will maintain a list of all personnel with access to the storage room and vault. The room and the vault will be time-controlled, meaning access will only be granted during regular business and shipment hours, except when manual override is necessary to provide access in the case of an after-hours emergency. Motion sensors, vibration detectors and alarms will deter any criminal activity. The vault will be equipped with power back-up, so that lighting, security features, and climate control systems within the vault remain operational in the event of facility power loss. All storage areas containing cannabis and cannabis products will remain dry, well ventilated, have temperature-control features to avoid extreme temperature fluctuations, and appropriate odor-control features to help ensure that off-site odors shall not result from its operations and that quality and purity will not be adversely affected. Additional details regarding the product storage practices that will prevent deterioration of cannabis goods can be found in Part J of this narrative. Harvest will ensure that all transfers to and from storage areas will be witnessed and documented by two (2) employees and recorded in the inventory tracking system. Under no circumstances may any cannabis or cannabis product(s) be transferred or dispensed without following Harvest procedures and all the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements.

At all times that the Retail Facility is open, two (2) Security Guards will be present to assist with the secure storage of inventory.

#### Disaster Relief

If Harvest needs to move cannabis goods stored at the Facility to another location immediately to prevent loss, theft, or degradation of the cannabis goods from the disaster, Harvest may move the cannabis goods prior to Bureau approval if the following conditions are met:

- The cannabis goods are moved to a secure location where they are accessible only to Harvest's employees and contractors.
- Harvest notifies the Bureau and any other required governmental entities in writing within twenty-four (24) hours of moving the cannabis goods that a) the cannabis goods have been moved and b) Harvest requests relief from complying with specific requirements.
- Harvest provides the Bureau access to the new secure location where the cannabis goods have been moved for inspection purposes.



Harvest will submit a written request to the Bureau and any other required governmental entities, within ten (10) business days of moving the cannabis goods, for temporary relief clearly stating which statutory and regulatory sections from which Harvest is seeking relief, the time period for which relief is requested, and the reasons relief is needed for the indicated amount of time.

### Inventory Records and Documentation

Harvest will maintain accurate records of its inventory that render, balance and evidence all activities (from receipt of sale or disposal) regarding all cannabis and cannabis products in its possession. We will provide the Bureau, the City and any other required governmental entities with a record of our current inventory upon request. Harvest will keep a record of the following information for all cannabis in its inventory:

- A description of each item in Harvest's inventory. This description will be such that the cannabis goods can easily be identified.
- An accurate measurement of the quantity of the item.
- The date and time the product was received by Harvest.
- The sell-by or expiration date on any cannabis goods, if any.
- The name and license number of the licensed transporter that delivered the cannabis goods.
- The name and license number of the licensed distributor that provided the cannabis goods to Harvest.
- The price Harvest paid for the cannabis goods, including taxes, delivery costs, or any other costs.

MJ Freeway will be Harvest's primary virtual system to track cannabis product inventory. MJ Freeway will record data points for the different stages of commercial activity, including, but not limited to, cultivation, harvest, processing, distribution, inventory, and sale. Harvest will ensure that each day's beginning inventory, acquisitions, sales, disbursements, disposal of unusable cannabis products, and ending inventory are documented in the statewide track and trace system, as well as the MJ Freeway. More information about Harvest's third-party seed to sale system can be found in Part G of this narrative.

Harvest will use a standard of measurement supported by the statewide track and trace system and approved by the California Department of Food and Agriculture ("the Department") to track all cannabis products. Cannabis goods will be weighed, recorded, and reported in U.S. Customary units (e.g. ounce or pound) or International units (e.g. kilograms, grams, or milligrams), and fractions thereof. The scale used to weigh cannabis products will be Department-approved,

certified Legal-for-Trade, NTEP approved, and tested and sealed in accordance with Division 5 of the California Business and Professions Code and any applicable regulations thereunder. Documentation of approval, testing, certification, and sealing of scales by the county sealer will be maintained and a copy will be provided to the Department, upon request.

## RECORD MAINTENANCE

Harvest will maintain complete, accurate, current, legible, and comprehensive books and records on-site at its Retail Facility and on a secure cloud storage system. Harvest's standard operating procedures will detail the maintenance of accurate records of commercial cannabis activity and address measures for reporting any loss or unauthorized alteration of records. Our Recordkeeping will include all necessary books and records required to render a full account of all commercial cannabis operations at Harvest's Facility for the year-to-date and the seven (7) years prior, as required by the licensing authorities, in both hard and electronic copy. All required records, identified by the licensing authorities, will be secured in a limited access storage area where the records are protected from debris, moisture, contamination, hazardous waste, fire, and theft.

The Bureau, the City, and other licensing authorities may examine Harvest's records as the licensing authority, or a state or local agency, deems necessary to perform its duties under this division. Records will be kept in a manner that allows the records to be produced for the Bureau and the City at Harvest's facility in either hard copy or electronic form, whichever is requested. Harvest will maintain electronic storage of all required records of sales, delivery, manifests, patient information, and inventory which can be provided to the City upon request. All inspections and examinations of records will be conducted during standard Harvest business hours.

The Chief Operating Officer and Director of Retail Operations, in coordination with all managers, will ensure all documentation will be maintained in accordance with Harvest's procedures and with the rules set forth by the Bureau, the City, and all applicable state and local laws, regulations, ordinances, and other requirements. All records and logs described and required herein will be maintained and reviewed by the appropriate manager. Required records and logs, which will be kept onsite for seven (7) years, produced within twenty-four (24) hours for the City, and, where indicated, on a secure cloud storage, include:

- Financial records including, but not limited to, bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration under Title 18 California Code of Regulations sections 1698 and 4901.

- Personnel records, including each employee's full name, social security, or individual tax payer identification number, date of beginning employment, and date of termination of employment, if applicable.
- Training records, including but not limited to the content of the training provided and the names of the employees that received the training.
- Contracts with other licensees regarding commercial cannabis activity.
- Permits, licenses, and other local authorizations to conduct Harvest's commercial cannabis activity.
  - o Harvest's state retail license will be prominently displayed at the Retail Facility where it can be viewed by state and local agencies.
  - o Valid Seller's Permit
  - o Proof of building ownership or landlord letter acknowledging the business type.
  - o Proof of insurance.
    - Harvest will maintain a comprehensive general liability combined single occurrence insurance policy issued by an "A" rated insurance carrier in an amount no less than \$2,000,000 and naming the City as an additional insured. Documentation for that policy will be kept and made available to the City of Santa Rosa
- Security records, including but limiting to the following:
  - o Employee Access Control Logs.
  - o Visitor Registration Logs.
  - o Authorized Visitor Access Control Logs.
  - o Incident Logs and Post-Incident Reports.
  - o Delivery Logs, including a full list of deliveries, addresses, and the amount of product delivered.
  - o Alarm system records.
  - o Surveillance system records and recordings.
- Facility records, including but limiting to the following:
  - o Facility Maintenance Logs.
  - o Equipment List.
  - o Equipment Cleaning Logs.
  - o Equipment Maintenance Logs.
  - o Waste Disposal Logs.
  - o Manifests.

- Job Hazard Analysis Logs.
- Material Safety Data Sheets.
- Hazardous Chemicals Inventory Lists.
- Dispensing
  - Consumer profile records.
  - Sale Error and Discrepancy Report.
  - All other records required by the Bureau.
  - Statewide Track and Trace System Authorized Users Logs.
  - Loss of Access to Statewide Track and Trace System Logs.
  - All storage and transfer records.
- Quality Assurance
  - Product Complaint Form.
  - Withdrawal and Recall Log.

All logs, forms, and records will include a date and time stamp, as well as the name and identification number of the employee completing the action being documented.

## PROTECTED INFORMATION

Access to protected information will be restricted to essential employees only. Our electronic storage system for the retrieval of patient and consumer information or other records guarantees information confidentiality and HIPAA compliance. The system provides safeguards against erasures and unauthorized changes in data after the information has been entered and verified, allows for a true audit trail and indicates and dates any edits or deletions to patient records. The system can be reconstructed and retrieved within 3 business days if there's a computer malfunction or accident resulting in the database's destruction.

Access may be granted to representatives of the Bureau and other government officials if necessary to perform their official duties. Examples of protected information include:

- Security and cash management procedures.
- Asset and inventory lists.
- Network data.
- Floor plans of critical areas.
- Password and code records.

- Consumer records.
- Employee records.

#### DESCRIPTION OF RECORD STORAGE

Harvest's third-party seed to sale tracking system, MJ Freeway<sup>1</sup>, is a Platform ERP software hosted on cloud-based servers that collect all sales information, patient information, caregiver information, and purchase transaction information including every detail outlined in this section.

The database stores sales information including patient identifiers, product display name, product identifiers, form, and quantity sold. Every transaction, such as a sale, purchase order, movement of inventory, inventory adjustment, and inventory reconciliation is serialized and recoverable on-demand and retrieved in seconds. This data lives in the Platform system through the life of the system. At minimum, Harvest will utilize the statewide track and trace system (METRC) and MJ Freeway, simultaneously, to do the following:

- Monitor business activities, inventories, transportation and sales transactions.
- Record details about the retail process and inventory management activities in accordance with internal company policy.
- Enter required information regarding acquisition, inventory management, packaging and labeling, distribution, and sale in the statewide track and trace system in accordance with applicable statutes and regulations.
- Maintain data regarding from whom goods were received, the type and amount of goods received, the party who hold title to the goods and the UIDs or lot number of the goods.
- Produce an electronic history of production, quality assurance, and distribution for each batch or lot and inventory transfers or sales between licensees and locations.
- Produce labeling for batches or lots in each stage of the retail process.
- Produce Finished Product labeling for all nonmanufactured cannabis products to be packaged and labeled on site.
- Generate reports on demand.



## SALES RECEIPTS

Harvest will maintain an accurate record of every sale of cannabis goods made to a customer as required by Bureau regulation. MJ Freeway is integrated with the point of sale system, allowing Harvest to maintain all necessary records of sales. Each sales invoice, created or maintained by authorized Harvest personnel will include the following information:

- Date and time of the transaction;
- Invoice number;
- A list of all the cannabis goods purchased, including the quantity purchased;
- Cannabis excise tax listed separately from the list price.
- The total amount paid for the sale including the individual prices paid for each cannabis good purchased and any amounts paid for taxes.
- A statement that reads: "The cannabis cultivation and excise taxes are included in the total amount of this invoice."
- Any additional information specified by the Bureau.

## Tax Documentation

All sales transaction will be subject to applicable tax rates. If applicable, the proper tax rates will be programmed into each point of sale system to ensure that tax is collected. The Chief Operating Officer, in coordination with the Accountant, will ensure the proper collection of tax on all taxable products sold in the Facility.

Purchasers of cannabis or cannabis products will be subject to a cannabis excise tax at the rate of fifteen percent (15%) of the average market price of any retail sale by a cannabis retailer. Harvest will provide all consumers with an invoice, receipt, or other document that displays the cannabis excise tax separately from the list price, the price advertised in the premises, the marked price, or other price and includes a statement that reads: "The cannabis cultivation and excise taxes are included in the total amount of this invoice."

## Delivery Receipts

Harvest will maintain an accurate record of every sale of cannabis goods made to a customer. MJ Freeway is integrated with the point of sale system, allowing Harvest to maintain all necessary record of deliveries. Each delivery receipt, created or maintained by authorized Harvest personnel will include:

- Harvest's name and address.

- The name of the employee who delivered the order.
- The date and time the delivery request was made.
- The 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.
- The total amount paid for the delivery including any fees or taxes.
- The time of delivery request.
- The date and time the delivery was made.
- The signature of the person who received the delivery.

## Manifests

Harvest will maintain every transport manifest documenting the transfer or transport of cannabis goods to and from the dispensary.

Harvest will not accept any shipment of cannabis and cannabis products without receiving a copy of a Shipping Manifest from the licensed distributor transporting the shipment. Shipping manifests generated by and maintained in the statewide track and trace system will include, without limitation, the following information:

- Variety and quantity or weight of cannabis goods shipped.
- Estimated times of cannabis goods departure and arrival.
- Variety and quantity or weight of cannabis goods received.
- Actual time of departure and arrival.
- A categorization of the product.
- The license number and the unique identifier pursuant to CA Business and Profession Code, Section 26069 issued by the licensing authority for all licensees involved in the shipping process, including, but not limited to, cultivators, manufacturers, distributors, and Retail Facilities.

The manifest will be securely transmitted to Harvest and the Bureau. Once Harvest receives the shipment from a licensed distributor, Harvest will maintain an electronic copy of the shipping manifest for a minimum of seven (7) years and make all shipping manifests available upon request to the Bureau and any state or local law enforcement officers upon request. Upon receipt of the transported shipment, Harvest will submit a record verifying receipt of and the details regarding the shipment to the Bureau if required.

Harvest's third-party seed-to-sale system will be used in conjunction with the statewide track and trace system to keep a record of all cannabis and cannabis products acquired from a licensed distributor, including, but not limited to:

- The Shipping Manifest.
- Purchase order number.
- Date and time of acquisition.
- Description of the cannabis and cannabis products acquired, including the amount, strain, and batch number.
- Name and registration/license number of the licensed distributor.
- Name of the licensed distributor's employee, and registration identification number, if applicable, distributing cannabis and cannabis products to Harvest.
- Name and employee identification number of Harvest employee receiving the cannabis and cannabis products.
- Copies of purchase order, employees' identification card, and other supporting documentation.

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#### Patient Information

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Harvest will maintain the following patient information in MJ Freeway:

- The patient's full name.
- The patient's address.
- The patient's telephone number.
- A copy of the patient's physician-issued recommendation card or state-issued card

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#### Patient Privacy and Confidentiality

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Information contained in a physician's recommendation and received by Harvest, including, but not limited to, the name, address, or social security number of the patient, the patient's medical condition, or the name of the patient's primary caregiver is hereby deemed "medical information" within the meaning of the Confidentiality of Medical Information Act (Part 2.6 (commencing with Section 56) of Division 1 of the Civil Code) and will not be disclosed by Harvest except as necessary for authorized employees of the State of California or any city, county, or city and county to perform official duties pursuant to this chapter, or a local ordinance. Patient-specific retail transactions are confidential and not a public record. Harvest will vigorously implement privacy and security rules of the Health Insurance Portability and Accountability Act

(HIPAA) to include protecting the privacy of the patient's medical health information, personal identifying information, financial information, purchases, and all other patient-related information. Unless requested by the Bureau, required under law, or pursuant to a court order, all information held by Harvest about patients and employees is confidential and will not be disclosed without the written consent of the individual to whom the information applies.

Harvest will implement and maintain employee training procedures and policies including training on the standard operating procedures regarding patient confidentiality that will follow HIPAA guidelines, including, at a minimum, the following:

- Prohibit any patient information being shared or discussed outside of the Facility or in the presence of other patients, vendors, or any unauthorized personnel.
- Prohibit use of video recording or photography on the premises.
- Inform patients of privacy policy and complete and distribute the appropriate forms.
- Ensure any paper documentation containing patient identifiable information is kept in a secured location at all times or shredded immediately before discarding.
- Ensure electronic information is protected in accordance with Harvest's information technology security standard operating procedures.
- All rules set forth by the Bureau and other applicable state and local laws, regulations, ordinances, and other requirements for patients.
- Rights and responsibilities of patients, including:
  - o How patients can expect to be treated by employees of Harvest.
  - o Information that each patient will be required or requested to provide.
  - o How to provide feedback and suggestions, including procedures for communicating commendations and complaints.
- All other applicable policies.

#### CASH MANAGEMENT PLAN

Harvest has developed cash management policies and procedures for safely receiving, storing, and transporting cash payments. Our track record speaks for itself. Harvest's cash handling procedures include:

- Clearly defined roles for each person involved in cash-handling activities
- Cash counting procedures and equipment
- Protocols to prevent cash build-up
- Training for what to do in the event of a hold-up or an attempted hold-up
- 24-hour, 365-day surveillance of all areas of ingress and egress in addition to the lobby and receptionist area, all teller stations, and the storage vault
- Duress and panic alarms, and automatic dialing features that alert local law enforcement in the case of a threatening event such as a robbery or attempted robbery
- Hiring an armored car service to pick up and transport all cash receipts from the dispensary to our local financial institution

- Only accepting electronic payment – credit and debit cards – for medical cannabis deliveries

## OVERSIGHT

The dispensary's security manager will be responsible for implementing all security protocols, including cash management policies and procedures, directly overseeing security associates, and providing cash management training for existing employees and new hires.

### Security

#### Security Personnel

Per Cal. Code Regs. tit. 16, § 5045, we will hire or contract for security personnel to provide security services for the proposed dispensary. We will ensure that all security personnel hired or contracted will comply with Chapters 11.4 and 11.5 of Division 3 of the Business and Professions Code.

#### Surveillance

We will install a surveillance system that includes fixed camera placement allowing for a clear image of all individuals and activities in and around the following areas:

- All entrances to and exits from the facility, which will be recorded from both indoor and outdoor vantage points
- Rooms with exterior windows, exterior walls, roof hatches or skylights, and storage rooms, including those that may contain medical cannabis and safes, such as the storage vault
- All limited access areas
- Each point of sale location
- Parking areas and any alley areas immediately adjacent to the building

### Cash Handling Procedures

#### Start of Shift

At the start of a shift, each teller will collect his or her drawer from the safe in the storage vault. While in the vault, s/he will count the cash in the drawer, ensuring that the bills are properly sorted by denomination and arranged so that each stack of bills faces in the same direction, with the front of each bill facing up. Tellers will place the stack of one-dollar bills in the slot of the cash drawer furthest to the left. Five-dollar bills will be placed in the next slot, tens in the next, and twenty-dollar bills in the slot furthest to the right.

After counting all bills and coins, the teller will move to his or her teller station and place the drawer in its secure location in the register.

#### During the Shift

Tellers will accept credit and debit cards, checks, and cash payments throughout his or her shift. S/he will lift the cash drawer tray and place credit card receipts, checks, and large denomination bills (anything over \$20) under the tray for safekeeping until the end of his or her shift. If the cash and coins in the teller's



drawer exceeds shift limits set by the security manager, the teller will alert the teller manager who will temporarily close the teller's station so that the excess cash can be properly counted and stored in the safe until the end of the shift.

### **End of Shift**

At the end of the shift, each teller will print a point-of-sale report for his or her station, remove the tray from his or her register and take it into the vault to be counted. S/he will count all the cash and coins in the tray and confirm that the totals match the point-of-sale report. If there is a discrepancy, the teller will recount the cash and coins. If he or she cannot find the source of the discrepancy, s/he will call the teller manager, who will use a currency counting machine to recount the drawer. If the discrepancy remains, the teller will file a report with the security manager who will investigate the matter.

After counting and reconciling the cash, the teller will organize the credit and debit card receipts by time of day and place them in the electronic receipt envelope in the drawer. Once the tellers have counted and reconciled their drawers to the POS reports from MJ Freeway and organized the electronic receipts, the teller manager will alert the general manager that the day's cash is ready to prepare for deposit.

### **Preparing Deposits**

To calculate the total cash deposit, the teller manager will sum the deposits from each register. S/he will then print a closing report, sum each register's deposit value from the closing report, and compare this total deposit value to the total cash deposit. If there is a discrepancy, s/he will recount the cash deposit. If the values remain different, s/he will adjust the cash deposit to make it reflect the deposit amount from the closing report and report the discrepancy to the security manager for investigation.

After reconciliation with the closing report, the teller manager will put a copy of the closing report into an envelope along with the cash deposit. On the envelope, s/he write the date and the total deposit amount. If there are multiple deposit envelopes, s/he identify each envelope by number out of the total number of envelopes (e.g., 1 of 2, 2 of 2). The envelope(s) will then be placed into the safe in the vault.

### **Cash Storage**

Cash will be stored in a safe that is bolted to the concrete floor of the vault. It will feature 5-point premium NKL bolt-work hardware, an automatic locking detent mechanism, and burglary resistant lock with re-locker. The electronics feature positive user identification with electronic key, audit trail, and programmable delay and time lock settings.

### **Cash Transport**

Harvest will contract with an armored car service that will pick up cash from the dispensary twice per week, on Tuesdays and Fridays, or on an on-call basis when cash receipts exceed set levels. The security associate on duty will remove the cash deposits from the safe in the vault and meet the armed security guard in the lobby. There, s/he will pass, under video surveillance, the cash deposits to the armored car service guard. The guard from the armored car service will not enter the restricted area of the dispensary.

### **Deposit into a Banking Institution**

After receiving the cash deposits from the security guard, the armored car service will deliver the cash deposits to the dispensary's local banking institution where the cash will be recounted and deposited into Harvest's bank account.

#### QUALITY ASSURANCE AUDITS AND INSPECTIONS

Harvest will conduct audits and inspections of the entire dispensary facility to ensure all areas are compliant with Harvest policies and procedures and all state and local requirements. The Retail Manager will prepare a dated checklist of the areas or steps or procedures to be audited, using an established SOP (or SOPs) for the task being audited as a baseline control measure.

#### INVENTORY AUDITS & RECONCILIATIONS

Harvest will perform a reconciliation of its inventory at least once a week. The Inventory Manager will verify that the physical inventory of cannabis goods matches Harvest's records pertaining to inventory. Harvest will also reconcile its physical inventory with the records in the statewide track and trace system every week. An electronic record of the inventory reconciliation will be saved in MJ Freeway, which will include the date the inventory reconciliation was performed, a summary of findings, and the names and employee ID numbers of the individuals who conducted the inventory activity. Harvest will retain the results of each inventory reconciliation performed for a minimum of seven (7) years, and such records will be made available to the Bureau, the City and other applicable governmental entities upon request.

Should any electronic and physical inventories not reconcile at any given review or daily checkpoint, the Director of Retail Operations will be notified immediately and will assume responsibility for investigating the situation, including performing an audit to identify the source of the discrepancy. If the discrepancy can be traced to a simple transcription error concerning the location or placement of the product, the Director of Retail Operations will rectify the error in MJ Freeway and the statewide track and trace system, as required. After identifying the source of the discrepancy or other error, corrective action will be taken to ensure that there will be no further variances from expected amounts. The responsible party will be instructed as to how to avoid future errors.

If the Director of Retail Operations finds a significant discrepancy between the physical inventory count and statewide track and trace database records or Harvest's inventory records, the Director of Retail Operations will report the significant discrepancy to the Bureau, the City and local law enforcement, in writing, within twenty-four (24) hours of discovery. Harvest personnel will use the Harvest acquisition price to determine the value of cannabis goods in inventory when performing a reconciliation. A significant discrepancy in inventory means a difference in actual inventory compared to records pertaining to inventory of at least \$5,000 or 2.00% of average monthly company sales, whichever is less. Average monthly sales are calculated by taking a per month average of the total Harvest sales for the previous six (6) months. If Harvest is in operation for less than six (6) months at the time the significant discrepancy is discovered, only the months in which the Facility has been in operation will be used to determine average monthly sales.<sup>107</sup>

To conduct regular inventory audits, the Safety and Security Compliance Director, in coordination with the Controller, will:

- Assign the same two (2) employees, at least one (1) will be Director of Retail Operations Retail Manager, to recurring inventory groups whenever possible.
- Ensure that inventory audits are completed on schedule with minimal impact on regular operations.
- Review any discrepancies and document any adjustments made in the statewide track and trace system.
- Report any discrepancies identified during inventory audits to the Security Manager.

Harvest will follow good handling practices when conducting inventory audits to minimize risks of microbial contamination. Employees conducting inventory audits will be free of infectious illnesses. All inventory audits will be recorded in the statewide track and trace system and reconciled with existing inventory records.

#### REQUIRED INVENTORY RECONCILIATION SCHEDULE

Harvest will, at a minimum, conduct the following inventory reconciliation at the Facility:

- Daily inventory reconciliation – reconciling statewide track and trace system's beginning and ending cannabis inventory.
- Weekly inventory reconciliation – conduct and document a reconciliation of complete inventory.
- Semi-annual inventory reconciliation – complete inventory hand count with second count.
- Annual inventory reconciliation – complete inventory hand count with second count witnessed by Safety and Security Compliance Director or Controller.

#### DISCREPANCIES IN INVENTORY

Any discrepancy in weight or package reconciliation will be identified and reported. Discrepancies identified during inventory reconciliation, including dispensing errors, diversion, theft, loss, or any criminal action will be reported to the Director of Retail Operations and the Safety and Security Compliance Director. Additionally, the Safety and Security Compliance Director will determine where the loss has occurred and document all corrective actions.

The Compliance Director or Director of Retail Operations will notify the Bureau, the City and local law enforcement within twenty-four (24) hours after the discovery of any reportable incident, as defined by the Bureau or the City.

Reportable incidents include, but will not be limited to:

- Theft or physical loss of cannabis and cannabis products.

- Significant discrepancies identified during inventory.
- Diversion, theft, loss, or any criminal activity pertaining to the retailer's operation.
- Diversion, theft, loss, or any criminal activity by any agent or employee of the retailer pertaining to the retailer's operation.

The notification to the Bureau and the City will be in-writing and will include:

- The date and time of occurrence of the theft, loss, or criminal activity.
- The name of the local law enforcement agency that was notified.
- A description of the incident, including, where applicable, the item(s) that were taken or lost.

#### COMPLIANCE AUDITS

Harvest will conduct quarterly compliance audits to ensure the Facility is, at all times, compliant with the rules set forth by the Bureau, the City and all other applicable state and local laws, regulations, ordinances, and other requirements. The Director of Retail Operations, in coordination with the Chief Operating Officer, and managers, will conduct the compliance audits.

#### HEALTH AND SAFETY INSPECTIONS

The Compliance Director, in coordination with the Director of Retail Operations, will regularly conduct health and safety inspections to ensure the Facility is, at all times, compliant with all applicable state and local laws, regulations, ordinances, and other requirements regarding the health and safety of its employees.

#### ACCOUNTING AUDITS

An audit of Harvest's accounting records, as well as the physical inspection of its assets, will be performed quarterly. Our Accountant with oversight from the Controller will be required to perform audit activities. An annual audit of all financial records will be performed by an independent CPA firm selected by the CEO. Harvest's "whistleblower" policy exempts all employees who report the mishandling of cash from retribution.

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## INVENTORY AND UTILIZATION OF TRACK AND TRACE SYSTEM

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Harvest's inventory will be tracked with the use of two systems: the statewide track and trace system and Harvest's selected third-party seed-to-sale system, MJ Freeway. Harvest will utilize electronic equipment that may include, at a minimum, the following:

- Radio-Frequency Identification Devices.
- Bar code identifiers.
- Scanning equipment and software.
- Cash registers.
- Desktop computers.
- Mobile devices.
- Cloud-based technologies that manage all aspects of the cannabis life cycle from seed to sale.

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## THIRD-PARTY SEED-TO-SALE SYSTEM

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MJ Freeway will be the retailer's third-party seed-to-sale inventory tracking and internal production recordkeeping system. The system will function as a virtual system for tracking cannabis product inventory as well as recording and tracking other data points of interest to Harvest.

MJ Freeway's Platform ERP software is a comprehensive tracking management platform that provides real-time tracking and accountability for the inventory's life cycle "from seed to sale". The accountability of the dispensary process includes tracking products from intake/receipt, into storage and back-stock and, up until the sale of that product to a patient or the destruction of material. The dispensary accountability includes action-level accountability at the package level by recording every action to a product, such as intake, storage movements, reconciliations, sales, returns and destructions. Every action appears on the product history detail record with the time/date, user credentials, the actions performed, and the status change details as well as notes.

MJ Freeway's Application Program Interface (API) is designed to directly integrate with the Inventory Tracking System designated by the State of California, where all pertinent information is automatically updated in real-time. Once the designated system has published a functional API,



MJ Freeway's development team codes against that API. MJ Freeway has successfully integrated with state systems in other states.

#### TRACK AND TRACE COMPLIANCE

Harvest will record all commercial cannabis activity information required by the Bureau and the City and all other applicable state and local laws, regulations, ordinances, and other requirements, at minimum, on paper receipts, invoices or manifests, as well as on the state track and trace system and MJ Freeway, when available. Prior to commencing commercial cannabis activities under an annual license, Harvest will create and maintain an active and functional account within the statewide track and trace system prior to engaging in any commercial cannabis activity, including the purchase, sale, transfer, transport, return, destruction, or disposal of cannabis goods under a retail license issued by the California Department of Consumer Affairs' Bureau of Cannabis Control ("the Bureau"). Upon obtaining its annual license, Harvest will record all cannabis activity with other annual licensees.

Harvest will input all required inventory and other reportable information into the statewide track and trace system after the Director of Retail Operations attends the required track and trace system training session(s), per state requirements.

#### DESIGNATED TRACK AND TRACE ACCOUNT MANAGER

Harvest will designate one (1) individual owner to serve as the designated statewide track and trace account manager. The account manager will be responsible for training all retail personnel on the proper and lawful use of the statewide track and trace system and for administering and revoking Harvest's track and trace account user credentials, as appropriate.

Harvest's designated track and trace account manager will be the Director of Retail Operations. Although Harvest intends on completing all required training in a timely manner, if the Director of Retail Operations has not completed the required track and trace orientation training prior to Harvest receiving an annual license, the Director of Retail Operations will complete the state-mandated training within five (5) business days of the company's annual license being issued. The account manager will attend and successfully complete all Bureau-mandated track and trace system training, including any orientation and continuing education. The account manager will also be responsible for maintaining a complete, accurate, and up-to-date list of all track and trace system users, consisting of their full names and usernames in the *Statewide Track and Trace Authorized Users Log*. This list will be maintained on-site at Harvest's Facility and will be made available to the Bureau upon request.

## EMPLOYEE ACCESS TO INVENTORY TRACKING SYSTEMS

The Director of Retail Operations, in coordination with Harvest's management team, may authorize and distribute additional track and trace account user credentials to trained Harvest Managers and Wellness Representatives for the operation and maintenance of the Harvest track and trace account, as needed. Authorized users, including the account manager, are required to attend and successfully complete initial training prior to being granted access to the statewide track and trace system. The Director of Retail Operations will train new statewide track and trace system users in the proper and lawful use of the statewide track and trace system before they receive access credentials and are permitted to input, modify, or delete any information in the program. All statewide track and trace system users will also be required to participate in ongoing training as required by the Bureau and company management.

Each employee who obtains access to the inventory tracking systems on behalf of Harvest will be provided with unique system log-on credentials, consisting of a username and password. Harvest Wellness Representatives may only log into the inventory tracking systems using unique log-on credentials that have been individually assigned to that representative. Employees who have not completed training or who have not been granted their own unique log-on credentials will be prohibited from accessing or using the electronic inventory tracking systems at Harvest.

Employees who are authorized to use these systems are prohibited from sharing their credentials with any other person, for any reason. Only authorized employees that have completed training may access the statewide track and trace system and MJ Freeway, and any unauthorized access or sharing of credentials discovered will result in disciplinary action against the responsible party. Harvest management will track all employee actions while they are connected to the statewide track and trace system.

Harvest employees understand that inventory tracking system access is a revocable privilege and acknowledge, as a condition of employment and tracking system access, that he or she is responsible for ensuring the accuracy of all information entered in the statewide track and trace system on behalf of Harvest. Harvest further understands that Harvest remains accountable for all actions its owners and employees take while logged into or using the track and trace system or otherwise while conducting track and trace activities. Harvest and its representatives understand that inaccuracies or omissions may be considered a violation by the Bureau or the City, and as such, any employee caught entering inaccurate information or omitting information during inventory tracking will be subject to disciplinary action, including if appropriate, termination of employment or account access credentials.

## USE OF TRACK AND TRACE SYSTEM

Every authorized user of the statewide track and trace system and MJ Freeway will enter data into the system in a manner that fully and transparently accounts for all inventory management activities, including physical movement or destruction of cannabis goods at the Harvest Facility. The Chief Operating Officer, in coordination with the Director of Retail Operations, will be the agents with overall responsibility for overseeing the implementation and operation of MJ Freeway and the statewide track and trace system.

Once Harvest's track and trace system account is operational, all transactions will be entered into the track and trace system within 24 hours of the transaction. The statewide track and trace system account manager in coordination with all authorized system users will monitor all compliance notifications from the statewide track and trace system and timely resolve any issues identified. Harvest will keep independent records of all compliance notifications received from the statewide track and trace system, detailing how and when the compliance was achieved. If Harvest is unable to resolve the issue within three (3) business days of discovery, we will notify the Bureau and the City immediately.

Harvest's Director of Retail Operations will ensure that if the point of sale system is not functional for any reason that all transactions are properly recorded manually and entered into the system as soon as it will be available, if allowed by the Bureau.

## FACILITY-WIDE LOSS OF ACCESS TO INVENTORY TRACKING SYSTEMS

If at any time the Facility loses access to the statewide track and trace system for any reason, Harvest will prepare and maintain comprehensive records detailing all commercial cannabis activities that were conducted during the loss of access. Harvest will both document and notify the Bureau and the City immediately of when access to the system is lost, when it is restored, and the cause for the loss of access. Once access to the statewide track and trace system is restored, Harvest will enter all commercial cannabis activity that occurred during the loss of access into the system within three (3) business days of regaining access. Harvest will not transport, transfer, or deliver any cannabis goods until all information has been recorded into the statewide track and trace system.

## ENSURING ALL CANNABIS GOODS ARE PROPERLY PACKAGED AND LABELED

The Director of Retail Operations, in coordination with the Retail Manager, is responsible for inspecting all incoming inventory and for verifying that all packaging and labeling is compliant with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements. The Retail Manager will inspect all incoming shipments to ensure that all information required to be listed on a label is printed in legible English and designed and applied so that the labels will remain in place and legible during the customary conditions of distribution, storage, and use. Approved labels will be designed to include all applicable requirements of the Bureau, the State Department of Public Health, or the Department of Food and Agriculture, including the net weight of the contents of the package, and the unique identifier issued by the Department of Food and Agriculture for use in the state-wide track and trace system. Harvest will only accept cannabis goods from a licensed distributor and will not engage in any packaging or labeling of cannabis or cannabis products. All container and packaging labels accepted for use by Harvest's Retail Facility will be compliant with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements.

### Packaging

Approved packaging will be child-resistant, tamper-evident, maintain the integrity and stability of the product, prevent the product from contamination, and will not be attractive to children or impart any toxic or deleterious substance to the goods contained within. Tamper-evident for the purposes of compliance with state law means the product is packaged in a container within which a product is sealed so that the contents cannot be opened without obvious destruction of the seal. Pharmaceutical-grade packaging materials that preserve the quality and purity of cannabis goods stored within must be utilized.

### Pre-Display Packaging and Labeling Review Criteria

Cannabis and cannabis products will be packaged in a resealable, tamper-evident and child-resistant package approved by the Bureau prior to delivery or sale at Harvest's Retail Facility and must include all information required to identify and track cannabis and cannabis products. Packages and labels must not be designed to be attractive to children.

Harvest will not accept from a licensed distributor any cannabis goods or products that are not packaged as they will be sold at final sale, and Harvest will not package or label any cannabis

goods or products. The Retail Manager will ensure that all cannabis goods accepted for sale or delivery by Harvest have not exceeded their expiration or sell-by date if one is provided, and that all cannabis products accepted into inventory comply with Business and Professions Code § 26130.

In addition to the packaging inspection criteria described above, inventory may not be transferred to the retail sales floor before the Retail Manager or his/her designee reviews a randomly selected sample of the cannabis and cannabis products and conducts a review to ensure the packaging and labeling meets all of the following requirements:

- All cannabis and cannabis product labels and inserts will include the following information prominently displayed in a clear and legible fashion in accordance with the requirements, including font size, prescribed by the Bureau, the State Department of Public Health or the Department of Food and Agriculture:
  - o The following statements, in bold print:
    - For cannabis: "GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."
    - For cannabis products: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."
  - o For packages containing only dried flower, the net weight of cannabis in the package.
  - o Identification of the source and date of cultivation, the type of cannabis or cannabis product and the date of manufacturing and packaging.
  - o The appellation of origin, if any.
  - o List of pharmacologically active ingredients, including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content, the THC and other cannabinoid amount in milligrams per serving, servings per package, and the THC and other cannabinoid amount in milligrams for the package total.



- A warning if nuts or other known allergens are used.
  - Information associated with the unique identifier issued by the Department of Food and Agriculture.
  - For a medicinal cannabis product sold at a retailer, the statement "For Medicinal Use Only."
  - For edibles, the statement "cannabis infused" above the product identifier in bold in a font larger than the identifier.
  - Any other requirement set by the Bureau or the State Department of Public Health.
- The label and all required label information is affixed to the container so as to be unobstructed and conspicuous, and all label text shall be no less than 6-point font in relation to the size of the container, as applicable.
  - The label of any cannabis or cannabis product does not contain any advertising or marketing health-related statements that are untrue in any particular manner or that tend to create a misleading impression as to the effects cannabis consumption has on health.
  - Beginning January 1, 2018 through June 30, 2018, Harvest may sell cannabis or cannabis products that have not been tested for a limited and finite time as determined by the Bureau. During this period, all approved cannabis and cannabis products must have a label affixed to each package containing cannabis or cannabis products that clearly states:
    - "This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act" and must comply with any other requirement as determined by the Bureau.
  - Only generic food names are used to describe the ingredients in edible cannabis products.
  - Edible products must have the phrase "cannabis infused" directly above the identity of the product in bold in a size larger than the product identity.

#### Exit Packaging

Harvest will place all cannabis and cannabis products purchased in an opaque exit package prior to the customer leaving the premises. Harvest's exit packaging will meet all of the following requirements:

- Package will be designed or constructed to be significantly difficult for children under five (5) years of age to open and not difficult for adults to use properly, as defined by 16 C.F.R. 1700.20.
- Package will be opaque so that the cannabis goods cannot be seen from outside the packaging.
- For any cannabis goods that will be intended for more than a single use, the package will have the ability to be resealed for multiple uses.

- The package will be labeled properly in accordance with Bureau instruction and all other applicable state and local laws, regulations, ordinances, and other requirements.

Customers who purchase cannabis or cannabis products will not be permitted to leave the licensed retail premises unless the cannabis goods are placed in an opaque exit package.

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#### PRACTICES FOR ENSURING ALL PRODUCTS ARE TESTED BY A LICENSED TESTING FACILITY

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As previously stated, Harvest will not engage in any packaging or labeling of cannabis goods and will not accept any cannabis goods from a distributor that have not passed testing by a licensed laboratory or that are not packaged for final sale in full compliance with Bureau regulations, and the criteria listed above. Further, Harvest will only sell edible cannabis products that do not exceed 10 milligrams of tetrahydrocannabinol (THC) per serving.

In addition to the packaging inspection criteria described above, Harvest will inspect all products to ensure that all cannabis products on the premises or held in Harvest's possession have met the testing requirements as defined by the state. Harvest will require distributors to supply evidence of testing and all testing results to Harvest before Harvest agrees to sell the distributor's product.

These testing records will be maintained on site as well as on the secure cloud server for seven

(7) years. Inventory may not be transferred to the retail sales floor before the Retail Manager or his/her designee reviews a randomly selected sample of the cannabis and cannabis products and conducts a review to ensure the packaging and labeling meets all of the testing requirements.

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#### Untested Products

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Beginning January 1, 2018, through June 30, 2018, Harvest is permitted to sell cannabis or cannabis products in inventory at the time of licensure that have not been tested. However, the Retail Manager or personnel at the point-of-sale must ensure that these cannabis and cannabis products have a label affixed to each package that clearly states, *"This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act."* Such products will also be labeled to reflect that the City has not tested or inspected any cannabis products for pesticides or other regulated contaminants. Any untested cannabis goods permitted to be sold during this period will comply with all other applicable State and local requirements.

## Quality Control in Retail Products

The Director of Retail Operations, in coordination with the Retail Manager, will be responsible for ensuring all employees fully comply with all of Harvest's retail operations policies and procedures to prevent deterioration of cannabis goods. The policies and procedures will, at a minimum, reflect the following quality assurance principles:

- Implementing handling procedures that prevent contamination of cannabis and cannabis products.
- Ensuring all cannabis and cannabis products received satisfy all state requirements regarding identity, strength, quality, and purity, of the cannabis goods sold.
- Ensuring all cannabis goods sold are compliant with all rules set forth by the Bureau.
- Approving or rejecting all procedures, which may impact the identity, strength, quality and purity of cannabis and cannabis products
- Protecting any containers or packaging from contamination.
- Ensuring all cannabis goods dispensed by Harvest's Retail Facility satisfy all applicable packaging and labeling requirements.
- Implementing sustainable and zero-waste practices whenever possible.
- Ensuring transparency of all retail operations.
- Ensuring that no unlawful sales transactions will be permitted or tolerated.
- Conducting and documenting a quality assurance audit of the Harvest's daily inventory at least once a week to ensure that no cannabis goods have been improperly stored or have exceeded or past their sell-by date.

## STORAGE CONDITIONS

Cannabis product and inventory storage areas will be climate controlled, permitting control of temperature and humidity and will prevent the entry of environmental contaminants such as smoke and dust. The storage area in which cannabis goods will be kept will not be exposed to direct sunlight so as to ensure the integrity of cannabis prior to its use. Storage of cannabis goods outdoors will be expressly prohibited. Employee break rooms, changing facilities, and bathrooms will be completely separated from the storage areas. The facility, including all storage areas, will be kept free from infestation of pests.

The storage areas containing cannabis and cannabis products will remain dry, well ventilated, have temperature-control features to avoid extreme temperature fluctuations and appropriate odor-control features to help ensure that its identity, strength, quality and purity will not be adversely affected. Cannabis and edible cannabis products that require refrigeration will be kept at a temperature between 35° F and 42° F. These proper storage environments ensure product storage will not lead to product contamination or loss of quality.

#### IMPROPER STORAGE CONDITIONS

Any cannabis and cannabis products subjected to improper storage conditions, including, extremes in temperature, humidity, smoke, fumes, pressure, age or radiation due to natural disasters, fires, accidents or equipment failures, will not be salvaged and may not be sold to a consumer. Whenever it is unclear whether cannabis and/or cannabis products have been subjected to such conditions, salvaging operations may only be conducted if there is:

- Evidence from laboratory tests and assays that the cannabis and cannabis product meets all applicable standards of identity, strength, quality and purity.
- Evidence from inspection of the premises that the cannabis and cannabis product and its associated packaging was not subjected to improper storage conditions as a result of a disaster or accident, if any.

Harvest will maintain records in the inventory tracking system that include the name, batch number, and disposition of cannabis and cannabis products salvaged.

The Bureau, and, if applicable, the City, may retrieve samples of Harvest's cannabis and cannabis product inventory and submit such samples to a testing laboratory for appropriate testing upon reasonable suspicion that expired, damaged, deteriorated, misbranded or adulterated cannabis is:

- Being or has been dispensed to consumers; or
- Intermingled with Harvest's cannabis inventory until they are destroyed in accordance with Harvest's destruction policy.

Expired, damaged, deteriorated, misbranded, or adulterated cannabis will not be stored at the Harvest for more than one (1) week.

#### CUSTOMER COMPLAINTS

Harvest will establish a procedure for handling complaints regarding its cannabis and cannabis products. The procedure will include:

- Collecting information, including:
  - o Contact information for individual who reported a complaint.
  - o Identity of the specific cannabis and/or cannabis product used, if known.
  - o A description of the complaint or adverse event.
- Reviewing the cannabis complaint to determine whether the cannabis complaint involves a possible failure of cannabis to meet any of its specifications, or another requirements, including but not limited to those specifications and other requirements that, if not met, may result in a risk of illness or injury.
- Notifying the licensed distributor that provided the cannabis.
- Assisting the appropriate licensed distributor with the investigation process of any cannabis complaint that involves a possible failure of a cannabis product to meet any of its specifications, or any other requirements, including, but not limited to, those specifications and other requirements that, if not met, may result in a risk of illness or injury.

#### INVESTIGATION OF COMPLAINT

Once notification of a complaint has been received, Harvest will assist the licensed distributor that provided the cannabis goods with the investigation, including documentation and product tracking. Harvest will, at a minimum, do the following to assist with the investigation:

- Gather information from the consumer about the nature of the cannabis complaint.
- Determining the nature and potential causes of the problem.
- Enter all information into the Product Complaint Form.
- Provide a copy of the Product Complaint Form to the appropriate licensed distributor and, if requested, to the Bureau or the City.

This information shall be compiled in a central database so that issues can be identified and addressed in the appropriate manner.

#### CUSTOMER RETURNS OF CANNABIS GOODS

A customer return is defined as a return of cannabis goods that were purchased from a Retail Facility back to the same Retail Facility the cannabis goods were purchased from. Harvest also treats cannabis goods abandoned at its licensed premises as a return. Harvest will segregate, destroy, and render abandoned goods, along with returned goods, into cannabis waste in accordance with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements. Under no circumstances will Harvest ever resell cannabis goods that have been returned or abandoned.



Harvest may accept customer returns of cannabis goods, so long as those goods were purchased from Harvest's Retail Facility. If Harvest is accepting returned goods from an individual serving in a caregiver capacity, Harvest employees must first ensure the goods were sold to a patient for whom he or she provides care. All returns will be investigated to ascertain the reason for the return and the customer's account will be notated. The returned goods will be removed from their packaging and rendered into cannabis waste in accordance with Bureau regulations and Harvest's Waste Disposal Procedures. For more information on Harvest's waste disposal practices, please consult Part L of this narrative.

#### ABANDONED CANNABIS GOODS

Harvest will treat any cannabis goods abandoned on the premises as a consumer return. Harvest will remove the goods from their packaging and render the goods into cannabis waste in accordance with Bureau regulations and Harvest's Waste Disposal Procedures, detailed in Part L of this narrative.

#### RETURNS BETWEEN LICENSEES

If Harvest discovers that a manufactured cannabis good that was purchased from another licensee is defective, Harvest may return the defective manufactured cannabis good to the selling licensee only in exchange for a non-defective version of the same cannabis good or in exchange for a cannabis good of equal value. Harvest will not return cannabis goods purchased from another licensee for any other reason besides defective manufactured cannabis products.

#### RECALLS

The following details Harvest's comprehensive process for twenty-four (24) hour minimum response time to cannabis product recall notifications.

#### EXECUTING A VOLUNTARY WITHDRAWAL OR MANDATORY RECALL

If the Bureau, the City or the licensed manufacturer or licensed cultivator that supplied the cannabis goods determines that a voluntary withdrawal or mandatory recall must be initiated, Harvest will begin execution of a withdrawal or recall immediately.

Harvest will establish procedures for withdrawing or recalling a cannabis product in a manner that maximizes the recall of affected cannabis products and minimizes risks to public health and safety. The procedures will include:

- Securing, isolating, and preventing the distribution of all cannabis products that have been affected.
- Assembling a recall team responsible for a withdrawal or recall.
- Communication protocols.

The Controller will contact the insurance provider and determine coverage, if any. If the event is covered, the Controller will file all documentation necessary after the completion of the withdrawal or recall. The Controller will notify General Counsel and maintain communication with counsel throughout the withdrawal or recall procedures. Any recommendations by counsel for alternative procedures will be approved by the Chief Operating Officer.

#### RECALL TEAM

The Director of Retail Operations will appoint a recall coordinator and assign a team responsible for traceability for any withdrawal or recall event. The team will consist of a Retail Manager and employees from various departments. The team will coordinate all aspects of a withdrawal or recall. The recall coordinator will ensure that all procedures are carried out effectively and efficiently.

The team will receive appropriate training through mock withdrawal and recall procedures semi-annually so that they understand their responsibilities. The withdrawal and recall team list will be kept current and include the following information:

Name	Alternate Person	Daytime Phone	Alternate Phone	Responsibilities During a Withdraw or Recall
Director of Retail Operations				Decision making Bureau communications Obtaining legal counsel or other expert advice
Chief Operating Officer				Harvest communications Media communications Consumer communications
Retail Manager				Internal complaint investigation
Safety and Security Compliance Director				Internal complaint investigation
Retail Manger				Inventory reconciliation

## DUTIES OF RECALL TEAM

The goals of executing a withdrawal or recall are to:

- Halt sale of the affected cannabis and cannabis products.
- Remove the affected cannabis and cannabis products from Harvest's inventory and the market.
- Dispose of the affected cannabis and cannabis products.

The Chief Operating Officer will ensure the recall team has adequate resources to effectively execute a withdrawal or recall. The following will be conducted by the recall team:

- Gather all information collected in the tracking process.
- Send a Notification of Recall to all affected consumers.
- Detain and segregate all affected cannabis and cannabis products in the Facility.
- Coordinate and monitor the recovery of all affected cannabis and cannabis products.
- Conduct a reconciliation of the total quantity of recalled cannabis and cannabis products and affected cannabis and cannabis products in inventory against the total quantity received into inventory.
- Dispose of recalled cannabis and cannabis products according to Harvest's waste disposal procedures and rules set forth by the Bureau.
- Ensure the following information is entered in the Withdrawal and Recall Log and the inventory tracking system:
  - Name, batch number, and product identification code of the withdrawn or recalled cannabis and cannabis products.
  - Production date(s) of the withdrawn or recalled cannabis and cannabis products.
  - Reason for the withdrawal or recall.
  - Quantity of withdrawn or recalled cannabis and cannabis products sold to a consumer.
  - Quantity of withdrawn or recalled cannabis and cannabis products in inventory.
  - Quantity of recalled cannabis and cannabis products returned to Harvest, including types, forms, batches and product identification codes, if applicable.
  - From whom the recalled cannabis and cannabis products were received.
  - The manner of disposal of the recalled cannabis and cannabis products, including:
  - The name of the individual overseeing the disposal of the recalled cannabis and cannabis products.
  - Name of the disposal service provider, if applicable.
  - Method of disposal.

- Date of disposal.
- Amount disposed of by types, forms, batches and lots, if applicable.
- Any other information required by the Bureau or the City.

After the withdrawal or recall event, the recall team will conduct a post-event meeting to evaluate and report the effectiveness and outcome of the recall. The Director of Retail Operations will complete the Withdrawal and Recall Log. The Log will be made available to the Bureau, the City other applicable governmental agencies, upon request.

#### WITHDRAWAL OR RECALL COMMUNICATIONS

Harvest will establish procedures for communicating a withdrawal or recall of cannabis and cannabis products. Procedures must include:

- A mechanism to contact all consumers who have, or could have, obtained the cannabis and cannabis products from Harvest.
- Information on the return or destruction of any recalled cannabis and cannabis products.
- A mechanism to contact Harvest.
- Communication and media outreach, as necessary and appropriate.

Harvest's communications will include the following:

What to Communicate	Internal
Media/External Communications Policy	Employees
Complaint Information for Investigation	Recall Team
Stop/Hold/Destroy Product	Director of Retail Operations
Return/Destroy Product	Director of Retail Operations
Credit/ Replacement/ Stop Promotions	Retail Manager
Track All Expenses	Controller
Product Return and Refund	Wellness Representatives and Managers
Type of Communication	External
Recall Notification	Website

Recall Notification (Email/Letter)	Consumer
Press Release	Media
Recall Notification	Social Media
Recall Signage/Placards/Posters	Facility
Status of Recall	Bureau

#### TRACKING WITHDRAWN OR RECALLED CANNABIS PRODUCTS

All withdrawn or recalled cannabis and cannabis products will be tracked, located, detained, and segregated. Withdrawn or recalled cannabis and cannabis products will be quarantined and labeled with a sign stating, "DO NOT DISTRIBUTE." These will be stored in a location not accessible to the public. All cannabis and cannabis products located will be entered in the Withdrawal and Recall Log and accounted for in the inventory tracking system.

All cannabis and cannabis products which have been received for retail sale or have been sold to a consumer fall into this category. Tracking activities will include:

- Identify the affected and any other potentially affected cannabis and cannabis products, batch number(s), product identification code(s) and cannabis production date(s).
- Determine the quantity of affected cannabis and cannabis products.
- Determine from the inventory tracking system and point of sales system the last day of shipment for the affected cannabis and cannabis products.
- Determine from the point of sale system all the consumers who purchased the affected cannabis and cannabis products.
- Determine from the inventory tracking system the remaining quantity of the affected cannabis still in inventory.

#### RETURNED WITHDRAWN OR RECALLED CANNABIS PRODUCTS

Harvest will establish a procedure describing the receipt, handling, and disposition of returned affected cannabis and cannabis products in accordance with the rules set forth by the Bureau, and all applicable state and local laws, regulations, ordinances, and other requirements. Returned products will be identified as such and be quarantined until disposed of.



## DISPOSAL OF WITHDRAWN OR RECALLED CANNABIS PRODUCTS

All recalled products returned or in inventory will be quarantined for a minimum of seventy-two (72) hours, segregated, and destroyed in accordance with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements. The products held in quarantine for a recall shall be subject to auditing by all applicable governmental agencies.

## MOCK WITHDRAWAL AND RECALL DRILLS

Mock recalls are used to determine whether the withdrawal and recall procedures are capable of identifying and quickly controlling a given batch of potentially affected cannabis and cannabis products and reconciling the quantities sold and quantities in inventory. A mock withdrawal or recall can identify potential problems and allow employees to become familiar with recall procedures.

Harvest will carry out mock withdrawal or recall procedures at least annually by randomly selecting one (1) cannabis and cannabis products for withdrawal. The mock procedures will follow all regular procedures. However, no cannabis and cannabis products should be taken from consumers or removed from inventory.

If problems are identified in the recall procedures, they will be corrected by Director of Retail Operations and the recall team members will be retrained on new procedures. All corrective actions and deficiencies will be documented in Withdrawal and Recall Log as a drill and submitted to the Chief Operating Officers

## TRANSFER/TRANSPORT OF CANNABIS PRODUCTS TO AND FROM SHIPPING AND RECEIVING AREAS

Areas used to receive, load, and unload cannabis goods for retail sale and delivery will be a secure limited access area. The Harvest dispensary has a secure back door that will only be used for transfer and transport of cannabis products to and from the premises, as designated on the premises diagram in Section 2 of this application. The secure do will lead directly into the dedicated secure delivery unloading and loading area. Security Guards and the Safety and Security Compliance Director will ensure and maintain security in this area. The secure delivery unloading and loading area will have the following features:

- Access control points will include the positive identification of all employees and service providers at all points of entry.
- An alarm system will provide silent alarm capability and full-coverage video surveillance of all loading areas.
- Physical barriers guarding against unauthorized access to the area.
- Locking vehicle access gates controlled by the Safety and Security Compliance Director.

All cannabis products leaving the facility for delivery will be moved from the secure packaging room where they will be prepared for transport into the secure delivery unloading and loading area. An inventory and a final check of the transport manifest will be conducted in the secure delivery loading and unloading area before the product is loaded into the delivery vehicle for transport.

## MANIFESTS

As detailed in Part E above, Harvest will not accept any shipment of cannabis and cannabis products without receiving a copy of a Shipping Manifest from the licensed distributor transporting the shipment.

The manifest will be securely transmitted to Harvest and the Bureau. Once Harvest receives the shipment from a licensed distributor, Harvest will maintain an electronic copy of the shipping manifest for a minimum of seven (7) years and make all shipping manifests available upon request to the Bureau, the City and any state or local law enforcement officers upon request. Upon receipt of the transported shipment, Harvest will submit a record verifying receipt of and the details regarding the shipment to the Bureau or the City, if required.

When generating manifests for the delivery of cannabis products, a delivery transport manifest will be included include detailed information including destination address, route traveled, vehicle used for the transport, receiver's marijuana license information, shipment date, custody of the shipment, customizable notes about the shipment, and details about each package included in the transfer. The package details include Gross and Net weight, Strain, Product, and Package specifics, Harvest date, and more. The document management system within MJ Freeway allows the user to attach any relevant information to the manifest in the following formats: gif, jpg, jpeg, bmp, png, and rtf. Our HIPAA-compliant secure servers retain all information for recall on-demand, ready for inspection by authorities. A manifest with all required information will accompany the Delivery Driver at all times during the delivery process. Detailed descriptions of our delivery process can be found in section GG of the Additional Questions for Delivery Services section of this application.

## RECEIVING SHIPMENTS OF INVENTORY

Harvest will only receive shipments of cannabis goods from a licensed distributor during regular business hours. Harvest will schedule shipments, either by scheduling appointments with specific licensed distributor or by establishing open vending times, during which any licensed distributor may drop off a shipment without a specific appointment. During business hours, any shipment of cannabis goods accepted by Harvest will not enter the premises through an entrance that will be available for use by the public to enter or exit the premises. Shipments will only enter through the secured back entrance dedicated to delivery unloading and loading.

As detailed in Part H, Harvest will not accept from a distributor cannabis goods that will not be packaged as they will be sold at final sale. Harvest will not purchase dried flower that is not already packaged for final sale. Upon accepting a shipment of cannabis goods from a licensed distributor and completion of any required inspection, recording, and segregation, Harvest personnel will immediately place the cannabis goods in a locked room or safe within a limited access area to prevent diversion, theft, and loss.

Any licensed distributor delivering cannabis and cannabis products to Harvest will provide the following information:

- The identity, quality, and cultivation conditions of cannabis and cannabis products.
- The extent and type of testing conducted on the cannabis and cannabis products, including:
  - o The type of test or examination used, if any, to determine the particular strain or cultivar of each lot of cannabis.
  - o The quantitative levels of contained constituents and the type of testing used.
  - o The absence or presence of specific classes of potential contaminants and the type of testing used. The information will disclose each of the following:
    - Residual solvents.
    - Pesticides.
    - Yeasts, molds, and mildew.
    - Other microbiological contaminants.

If Harvest has reason to believe the information provided by the distributor is not accurate, Harvest will seek clarification or correction of any such information.

## SHIPMENT INSPECTION

Upon receipt of a shipment, Harvest will verify and reconcile all cannabis and cannabis product package counts, labeling and actual weights and confirm that the cannabis goods have not

exceeded their expiration or sell-by dates before accepting the cannabis and cannabis products. Harvest will ensure that the cannabis goods received are as described in the shipping manifest and will record acceptance and acknowledgment of the cannabis goods in the statewide track and trace system. Inventory will be updated in the statewide track and trace system and MJ Freeway immediately upon receiving a shipment. If there are any discrepancies between the type or quantity specified in the shipping manifest and the type or quantity received by the Harvest, the Director of Retail Operations will record and document the discrepancy in the statewide track and trace system and in Harvest's business records, complete any reporting requirements and refuse the shipment if necessary. Upon receipt of inventory, the Retail Manager will ensure cannabis or cannabis product(s) will be properly labeled as required by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements before released for dispensing.

#### REFUSAL OF INCOMING CANNABIS PRODUCT

Harvest will refuse a shipment from a licensed distributor, in whole or in part, if any of the following determinations are made:

- Cannabis or cannabis product(s) are comprised of or contain prohibited ingredients, such as alcohol or tobacco.
- Cannabis or cannabis product(s) do not match the description or quantity indicated on the Shipping Manifest.
- Cannabis or cannabis product(s) are contained in damaged packaging that could have exposed the goods inside to contaminants.
- Cannabis or cannabis product(s) packaging do not meet Bureau or the City's requirements and all applicable state and local laws, regulations, ordinances, and other specifications.
- Cannabis or cannabis product(s) labeling do not meet the requirements of the Bureau and the City and all applicable state and local laws, regulations, ordinances, and other specifications.
- Cannabis or cannabis product(s) otherwise do not meet regulatory requirements.

Refusal of delivery will be documented on the Shipping Manifest and a copy kept on file with Harvest's cannabis acquisition records.

#### RECEIVING LIVE PLANTS



If a live plant is accepted into inventory for sale, the Director of Retail Operations must ensure that:

- The plant is not flowering.
- The plant or seed was purchased from a nursery holding a valid Type-4 license.
- A label is affixed to the plant or package containing any seeds with the following warning: "This product has not been tested pursuant to Medicinal and Adult-Use Cannabis Regulation and Safety Act."
- No pesticides are applied to the plant while in the retail inventory.

#### DISPOSAL OF UNUSED CANNABIS

The following content details Harvest's plan for disposal of all solid waste based on the best practices of the state.

#### CANNABIS WASTE MANAGEMENT

All cannabis waste, including waste composed of or containing cannabis goods, will be stored, secured, and managed in accordance with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements. All waste will be quarantined and secured in the secure packaging and destruction room, which is a limited access area. Harvest will not sell cannabis waste. Any cannabis or cannabis product that is expired, damaged, contaminated, or non-viable will be immediately segregated and destroyed. Harvest will ensure that all cannabis and cannabis products that have been subjected to improper storage conditions, extremes in temperature, humidity, smoke, fumes, pressure, age or radiation due to natural disasters, fires, accidents or equipment failures, will not be salvaged, but instead properly disposed of.

Harvest will only dispose of cannabis products in a secured waste receptacle in an area of the licensed premises only accessible by, Harvest employees, the waste hauler, and law enforcement personnel. Containers storing expired, damaged, deteriorated, misbranded, adulterated, returned, or opened cannabis will be clearly marked, "WASTE PRODUCT TO BE DESTROYED," and separated from other cannabis until destroyed in the designated packaging and destruction room. Cannabis waste will be made unusable and unrecognizable prior to leaving the dispensary facility through the process discussed below. Access to areas containing cannabis waste will be restricted to the Harvest's employees and the local agency or waste hauler franchised or contracted by the local agency under the supervision of a Security Guard. The public will not have access to this area.

#### DESTRUCTION OF CANNABIS-CONTAINING WASTE



Harvest will make unusable cannabis goods into cannabis waste by rendering the cannabis goods unusable and unrecognizable. Harvest will remove all goods from any packaging, and render the cannabis goods into cannabis waste, in full view of Harvest's surveillance cameras, before removing the cannabis waste from the premises. Harvest will render the cannabis goods into unusable and unrecognizable cannabis waste by grinding and incorporating the cannabis goods with other ground material such as trash, coffee grounds, compost or other material so that the resulting mixture will be at least fifty percent (50%) non-cannabis material by volume. After the cannabis waste has been rendered unusable and unrecognizable, Harvest will dispose of the cannabis products on at least weekly basis at a Bureau and City-approved location.

After Harvest renders the cannabis goods into cannabis waste, Harvest will ensure that a local agency or waste hauler franchised or contracted by a local agency transports it to one of the

following facility-types:

- A manned and fully permitted solid waste landfill or transformation facility.
- A manned and fully permitted composting facility or manned composting operation.
- A manned and fully permitted in-vessel digestion facility or manned in-vessel digestion operation.
- A manned and fully permitted transfer/processing facility or manned transfer/processing operation.
- A manned and fully permitted chip and grind operation.

Harvest will obtain documentation from the entity hauling the waste that indicates the date and time of each collection and a copy of the certified weight ticket or other documentation prepared by the entity hauling the waste that confirms the cannabis waste hauled was received at one of the above facilities.

#### CANNABIS WASTE DISPOSAL METHODS

Harvest will maintain accurate and comprehensive records regarding cannabis waste material that account for, reconcile, and evidence all activity related to the generation and disposal or deposition of cannabis waste.

Harvest will obtain and keep a record from the solid waste facility or other approved waste handling operation evidencing the acceptance of the cannabis waste material at the facility. The record will contain the name and business address of the facility, the name and phone number of

the primary contact person at the company, the date and time of each collection, the volume or weight of the cannabis waste accepted at each collection, and the name and signature of the person manning the facility who accepts the cannabis waste. These documents are records subject to inspection by the Bureau and will be kept in compliance with applicable state laws and regulations.

Harvest will record all cannabis waste into the statewide track and trace system. Harvest will use the track and trace system, MJ Freeway, and on-site documents to ensure the cannabis waste materials will be identified, weighed, and tracked while at the Facility and when disposed of or deposited.

All waste disposed of will be recorded in the statewide track and trace system and the Waste Disposal Log, which will be kept electronically in MJ Freeway. Harvest will use the statewide track and trace system and MJ Freeway to record the following:

- Date of disposal.
- Batch identification.
- Type and weight of cannabis waste disposed of.
- Description of and reason for the disposal of the cannabis and cannabis products.
- Confirmation that the cannabis and cannabis products were rendered unusable and unrecognizable before disposal.
- Manner of disposal.
- Name and identification number of the employee responsible for the disposal.
- Any other information required by the Bureau.

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#### NON-CANNABIS WASTE

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All non-cannabis waste will be disposed of in accordance with the rules set forth by the Bureau and all applicable state and local laws, regulations, ordinances, and other requirements. Harvest's non-cannabis waste disposal system will receive sufficient maintenance and kept free of odor and pests to prevent all sources of contamination.

All non-cannabis waste will be disposed of in a designated waste receptacle under control of Harvest. All non-cannabis waste must be kept in containers that are:

- Leak-proof.
- Rodent-proof.
- Feature a closing top.
- Lined with heavy-duty plastic trash bags.

All facility non-cannabis waste receptacles will be emptied daily and stored in a secure container and in accordance with all applicable state and local laws, rules, and regulations.

## HAZARDOUS WASTE

Harvest's hazardous waste will be handled, stored, and disposed of in a manner that is consistent with federal, state, and local laws and requirements, including Public Resources code section 40141. Hazardous waste is that which may pose a serious potential hazard to human health when improperly treated, stored, transported, or disposed of. Based on the proposed operations of Harvest's Facility, Harvest does not anticipate handling hazardous materials or generating hazardous waste. Examples of potentially hazardous waste at the Harvest's Retail Facility may include: cleaning products and sanitation aids. In accordance with the California Health and Safety Code and the U.S. Environmental Protection Agency's Worker Protection Standard, any hazardous wastes that may be present at the Facility will be stored handled, stored, and disposed of in a manner conforming to the manufacturer's Safety Data Sheet and labeling guidelines. If stored on-site, hazardous waste will be secured in a sealed and locked container within a limited-access area, prior to off-site disposal. Hazardous waste will be removed from the premises by a state-approved commercial waste hauler and all applicable hazardous waste records will be stored on-site and available to state and local authorities, upon request, for a minimum of seven years. All waste streams will be assessed for hazardous waste.

## MANAGEMENT PLAN

### PREMISES MAINTAINCE REGARDING TRASH AND GRAFFITI

Harvest is committed to being a good neighbor. All security measures will be reasonably designed to provide assurance that both patron and employee behavior does not detract from the quality of life for adjoining residents, property owners, and businesses. Harvest will complete a daily inspection to ensure maintenance of the interior and exterior of the facility. Harvest will ensure that that the Retail Facility premises and associated parking, including the adjacent area under the control of Harvest and any sidewalk or alley, will be maintained in an attractive condition and will be kept free of obstruction, trash, litter, and debris at all times. . In the event that vandalism in the form of graffiti occurs, it will be removed or painted over within twenty-four (24) hours. Adequately illuminating the exterior of the building in the evening will deter vandalism of any kind.

Harvest's Facility will be patrolled by a Security Guard at all times, prohibiting individuals from remaining on Harvest's premises if they are not or will not be actively engaging in the purchase of cannabis goods or any other activity expressly related to the operations of Harvest.

## SECURE FACILITY

### DELIVERY SERVICE OVERVIEW

Harvest is committed to providing high-quality cannabis and cannabis products to California's patient, caregiver, and adult-consumer population. Harvest values the relationships it has cultivated with the City of Santa Rosa and the consumers it serves and is dedicated to continuing to increase the value Harvest's Dispensary Facility will provide. Thus, in an effort to promote the convenience and accessibility of Harvest's unrivaled team of wellness representatives and first-class cannabis products, our Harvest Dispensary will offer a discrete and secure delivery service providing the same exceptional cannabis purchasing experience to lawful cannabis consumers at any eligible physical address within our City of Santa Rosa delivery radius. Harvest transportation and delivery policies and procedures will be compliant with the rules set forth by the Bureau of Cannabis Control ("Bureau"), the City of Santa Rosa and all applicable state and local laws, regulations, ordinances, and other requirements.

#### Logistical Expertise: Optimizing Operations

Harvest has significant experience operating secure and compliant commercial cannabis delivery services, as proven through its successful multi-store delivery service offerings in stringent regulatory environments such as Arizona. Harvest's Arizona operations have provided our California team with the critical foundation of knowledge needed for compliant transportation process envisioning, systems implementation, labor productivity, and customer service improvement. Harvest intends to use the wealth of information and logistical know-how it has developed in Arizona to operate the City of Santa Rosa's premier cannabis dispensary and delivery service.

#### Talent Acquisition: Harvest's Team of Wellness Couriers

Due to the sensitive nature of delivery service operations and the fact that our dispensary operates in a high security risk industry, all of Harvest's wellness representatives (employees) will be required to undergo background checks and security screenings as a prerequisite to employment. In addition to satisfying all state and local eligibility requirements, Harvest requires all prospective delivery service personnel to pass a pre-employment license check, have a safe history of vehicle operation, and have no DUI/DWI violations or serious moving traffic violations in the five years prior to Harvest employment. Only authorized Harvest wellness representatives

may be present in a delivery vehicle when a delivery is being performed or perform deliveries on Harvest's behalf and each wellness representative engaged in our delivery service operations must be at least twenty-one (21) years of age. Harvest's delivery services are designed to provide unparalleled value, demonstration of knowledge, and a holistic wellness purchasing experience; as such, all deliveries will be conducted by pre-approved and highly-trained staff. Harvest will not engage in the use of independent contractors or third-party services to deliver our premium cannabis goods. An accurate list of all authorized delivery personnel and proof of all required insurance policies will be maintained at the licensed premises and all employees who deliver cannabis goods will carry valid identification and a copy of the Harvest's commercial cannabis business permit at all times while making deliveries. Harvest is committed to providing a safe, efficient, and convenient service and expects its representatives to abide by the highest standard of care and conduct while performing such deliveries. Consumption of cannabis goods while conducting deliveries is prohibited, and any Harvest representative found to be in violation of this policy will be subject to termination.

### Commitment to Sustainability: Environmentally Conscious Delivery Service Fleet

In an effort to reduce Harvest's impact on the environment and to promote driver safety, Harvest will utilize 2018 Toyota Priuses with GPS tracking to facilitate its commercial cannabis delivery services. The Toyota Prius is a trusted leader in eco-mobility and offers advanced integrated safety technology, aerodynamic exteriors, and fuel-efficient performance (up to 58 mpg). Harvest is dedicated to continuing its commitment to serving as responsible stewards of the environment and is proud to support products that share these same values. Harvest looks forward to continuing its approach of incorporating environmentally conscious practices in all of its commercial cannabis operations.

### Community Education: A Catalyst for Change

Harvest has created a public information program to inform City residents of cannabis issues and the proper, safe, and legal use of cannabis goods in California. Harvest is committed to continuing to dispel the stigma and misinformation on cannabis use through our community education projects and by leading as a positive example of regulatory compliance. Harvest will also create and distribute an educational compliance pamphlet that spells out the prohibited conduct involving marijuana and marijuana products contained in Health and Safety Code Section 11362.3 to all delivery customers, using a standard format and content provided by the City for the



dissemination of such flyers. We are dedicated to furthering cannabis movement by offering respect, education and our promises to our patients, customers, neighbors, and the public.

### Compliance and Leadership: Responsible Corporate Stewardship

Harvest is committed to serving as a pristine example of regulatory compliance and to demonstrating responsible corporate stewardship throughout all aspects of its operations. Harvest has used its operating experience in other jurisdictions and has proactively engaged legal counsel and industry experts across the United States to identify and develop best practices for safe, compliant delivery service operations.

Harvest believes that successful implementation of compliant practices requires clear delineation of corporate policies, strong leadership to teach by example, and a commitment to learning and continuing improvement. As such, Harvest will abide by and enforce the following corporate policies, operating procedures, and regulatory requirements outlined below to ensure the implementation and maintenance of safe, compliant delivery service operations.

### DELIVERY SERVICE PROTOCOLS

#### Operating Procedures

Harvest has developed comprehensive operating procedures regarding the delivery of cannabis goods and will ensure that all delivery operations and activities are compliant with all applicable state and local laws, regulations, ordinances, and other requirements. These procedures will be designed to hold both Harvest management and all employees accountable for Harvest's operations and identify individual and collective responsibilities. All Harvest wellness representatives seeking to engage in delivery services will be trained on all delivery standard operating procedures, which incorporate applicable legal and regulatory requirements. Delivery personnel will be required to acknowledge and agree to abide by such procedures as a condition of employment.

#### Licenses and Permits

Harvest Cannabis Dispensary will obtain all business licenses, permits, and insurance required by the City of Santa Rosa and the State of California prior to commencing any

delivery operations. All commercial cannabis deliveries will be conducted in compliance with applicable laws and regulations, including, but not limited to, State regulations and the City of Santa Rosa Ordinance 2017-025. Additionally, all employees who deliver cannabis goods will carry valid identification and a copy of the Harvest's commercial cannabis business permit at all times while making deliveries.

### Restrictions on Service

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- Harvest restricts availability of its delivery service to adult consumers twenty-one (21) years of age or older, and qualified patients eighteen (18) years of age or older who possess a valid government issued identification card, and either a valid county-issued identification card under Section 11362. 712 of the Health and Safety Code or a valid physician's recommendation for himself or herself or for a person for whom he or she is a primary caregiver.
  - o Caregivers who present a physician's recommendation for the patient for whom he or she provides care will be required to provide written documentation containing the signatures and the printed name of the medicinal cannabis patient designating the individual as a primary caregiver for a medicinal cannabis patient.
- Harvest delivery services will be limited to serving consumers located at a physical address in the state of California. Addresses will be verified on-site prior to preparing deliveries to ensure compliance with this requirement.
- Harvest prohibits its wellness representatives from leaving the state of California while in possession of Harvest cannabis goods and from serving any addresses outside its delivery radius. Harvest's delivery vehicles will be equipped with fully-functioning GPS which allow for remote monitoring in real-time to supervise and monitor driver compliance.
- Harvest will not deliver cannabis goods to an address located on publicly owned land or any address on land or in a building leased by a public agency. This prohibition on delivery includes land held in trust by the United States for a tribe or an individual tribal member unless the delivery is authorized by and consistent with applicable tribal law.
- Deliveries may only be made between the hours of 8:00 a.m. Pacific Standard Time and 7:00 p.m. Pacific Standard Time.
- Harvest will not carry more than three thousand dollars (\$3,000.00) worth of cannabis goods in any delivery vehicle at any one time.

- Deliveries will never be made through the use of an unmanned vehicle.

### Consent to Inspection

Delivery employees understand that providing this service is a privilege and that any motor vehicle used by Harvest to deliver cannabis goods may be subject to inspection by the Bureau, the City of Santa Rosa, local and State law enforcement, Harvest management and any other applicable governmental or licensing entity. Vehicles used to deliver cannabis goods may be stopped and inspected by the Bureau at any licensed premises or during delivery. Delivery employees will fully cooperate with such inspections. Harvest wellness representatives are required to adhere to the highest standard of conduct while performing deliveries and are instructed to comply with all official requests for information. Upon request, Harvest delivery personnel will provide the Bureau and the City of Santa Rosa with information regarding any motor vehicles used for the delivery of cannabis goods, including the vehicle's make, model, color, Vehicle Identification Number, license plate number, and Department of Motor Vehicle's registration information. Additionally, copies of delivery request receipts generated through the inventory tracking system and *Trip Plans* will be kept in the vehicle for each delivery run.

Each wellness representative engaged in delivery services is required to carry a copy of Harvest' current business licenses, the representative's government-issued identification and driver's license, and a Harvest-issued employee identification badge displaying a picture and the name of the wellness representative. Wellness representatives must present these documents and identification, as well as any shipping manifests and delivery request receipts to state and local law government agents, upon request.

### DELIVERY PROCESS OVERVIEW

Harvest will offer in-person cannabis good deliveries conducted by our world-class team of wellness representatives. All cannabis goods will be delivered by a delivery team consisting of two (2) wellness representatives. Each member of the delivery team will be at least twenty-one (21) years of age, have a clean driving record, and have completed in-house training on cargo theft risk awareness and Harvest security procedures. At least one (1) employee will remain with the vehicle at all times when the delivery vehicle contains cannabis goods. As previously stated, each wellness representative engaged in delivery services is required to carry a copy of Harvest' current business licenses, the

representative's government-issued identification and driver's license, and a Harvest-issued employee identification badge displaying a picture and the name of the wellness representative. Wellness representatives must present these documents and identification as well as any shipping manifests and delivery request receipts to state and local law government agents, upon request. Employees will not wear any clothing or symbols that indicate ownership, possession or transportation of cannabis goods.

A wellness representative begins the process of delivery when he or she leaves the retail premises with the pre-ordered cannabis goods and ends the process when he or she returns to the Dispensary after delivering the cannabis goods. When delivery personnel are approximately five (5) minutes away from the delivery destination, as well as upon arrival, the Harvest representative that is not driving will telephone the authorized purchaser to inform them of the impending arrival and will alert our on-site security personnel of the arrival. Once at the delivery address, the wellness representative will verify the age and identification of the intended delivery recipient prior to removing the lock box from the vehicle.

### PROCESS TO ENSURE DRIVER AND PATIENT SAFETY

Protecting the health and safety of our employees and patrons, is of the highest importance to our company. Harvest is committed to the implementation and maintenance of a secure facility and to ensuring patient and driver safety throughout all delivery operations. Harvest's proactive risk mitigation strategy includes the utilization of industry-leading best practices, state of the art technology, strategic route planning, and a comprehensive employee training safety program. The Delivery Manager will be responsible for the implementation and maintenance of driver safety policies and procedures and will ensure all delivery personnel are adequately trained to properly follow such procedures. Through prevention, awareness, reporting, and responsible incident management, all employees will aid in maintaining the safety and security of Harvest's delivery drivers and customers. Harvest's driver and customer safety program and risk mitigation measures are outlined below.

### Required Insurance and Protection of Assets

Harvest will ensure that it obtains, and maintains in good-standing, all required insurance policies applicable to Harvest's retail cannabis business and delivery service operations. This includes, but is not limited to, obtaining and maintaining a City-approved automotive liability insurance policy in a minimum amount of one million

dollars (\$1,000,000.00) for any and all vehicles being used to transport cannabis goods, as well as Worker's Compensation insurance for all personnel as required by law. Prior to the issuance of any Harvest commercial cannabis business licenses, and at all times while such licenses are in effect, Harvest will maintain on file with the City proof of all insurance required by the City of Santa Rosa and the State of California.

Harvest appreciates the importance of protecting the people and property that allow our business to prosper. As such, if any of the above required insurance policies are canceled for any reason, Harvest will automatically suspend all delivery service operations until any required insurance policy has been reinstated.

### Safety By Design

#### Facility Safety: Secure Loading and Unloading Area

Harvest's Dispensing Facility is equipped with a separate, private entrance designated for accepting shipments of inventory and other equipment used in Harvest's dispensing and delivery operations. In order to facilitate driver safety and security, shipments of cannabis goods will only be received and prepared for delivery within a designated limited-access shipping and receiving area, accessible through a non-public entrance. Harvest will not accept any shipment of inventory through an entrance that is available for use by the public to enter or exit the premises and will apply the same standard to outgoing deliveries. Harvest will only receive and accept shipments of cannabis and cannabis products from a licensed distributor, during its regular operating hours.

On-duty Security Officers and managerial staff will supervise all shipment preparation and receiving activities to maintain security in the designated shipping and receiving space. At a minimum, Harvest' shipping and receiving area will be secured with the following:

- Access control points, which include the positive identification of all Harvest representatives and service providers at all points of entry.
- An alarm system that is equipped with silent alarm capability to notify management and law enforcement of a potential intrusion.
- Video surveillance of all entry and exit points, produced with enough clarity to allow facial recognition.

To ensure patient and consumer safety, Harvest will not engage in any packaging or labeling of cannabis or cannabis products and will not accept any cannabis or cannabis products from a distributor that are not packaged for final sale in full compliance with Bureau and the City of Santa Rosa regulations. As soon as approved cannabis or



cannabis products are delivered from the distribution Facility and delivery is accepted, the Retail Manager becomes accountable for them. The Retail Manager will immediately place the products in a secured and locked room, safe, or vault in a manner as to prevent diversion, theft, and loss. The Retail Manager maintains accountability for all approved cannabis and cannabis products until the inventory is dispensed or dispatched for delivery.

#### Vehicle Safety: 2018 Toyota Prius Safety Specifications

Harvest will utilize 2018 Toyota Priuses to facilitate its commercial cannabis delivery service operations. Harvest chose the Toyota Prius because these vehicles offer a suite of technologically advanced safety features in addition to being environmentally friendly. The 2018 Toyota Prius offers blind spot monitors, rear cross-traffic alert and backup cameras for safety when backing out of driveways and parking areas, rain-sensing windshield wipers, dual-stage front airbags, side-curtain and front-seat side airbags, and a variety of other safety specifications. In addition, Toyota's Star Safety System comes standard in all new Prius vehicles, which includes enhanced vehicle stability control, traction control, anti-lock brakes, and Smart Stop Technology. Although Harvest will utilize a variety of after-market security features such as locked storage containers for the secure transportation of products and sophisticated communication and GPS tracking devices, Harvest is confident in the Prius' ability to keep its drivers safe.

#### Vehicle Security: After-Market Security Specifications

Harvest's delivery fleet will be equipped with interior locked storage compartments for secure storage of cannabis goods while in transit. Each of Harvest' delivery vehicles will be outfitted with an active vehicle alarm system and a dedicated Global Positioning System (GPS) for identifying the geographic location of the delivery vehicle in real-time. Active vehicle alarm systems give the delivery personnel the ability to activate the vehicle's alarm system as needed, via a remote; however, at no time will Harvest personnel leave a delivery vehicle containing cannabis goods unattended, and at no time will cannabis or cannabis products be visible from the exterior of the vehicle. Although Harvest also requires all delivery employees to carry GPS-equipped phones while performing deliveries, a dedicated GPS device will be affixed to the delivery vehicle and will remain active and inside of the delivery vehicle at all times. GPS devices will provide real-time tracking of the geographic location of all delivery vehicles actively engaging in delivery services for consumers, and all GPS tracking information will be made available to the Bureau and law enforcement upon request.

As an added safety measure, the delivery employees will have access to a secure form of communication with a security officer at the licensed premises at all times when the vehicle contains cannabis goods via two-way radio communication equipment. The Director of Security or his/her assigned designee will ensure all delivery personnel are trained appropriately on its use, and that the system is fully functioning prior to the commencement of each day's delivery operations.

### Discrete Transport Systems

Harvest understands the intimate nature of cannabis good delivery service to patients and consumers and acknowledges that many individuals who prefer at-home delivery desire a discrete personalized service. Further, Harvest appreciates the security risks associated with the operation of a commercial cannabis business and acknowledges that such risks are increased when operations involve off-site transportation of cannabis goods. In an effort to ensure patient and driver safety, Harvest's delivery fleet will consist strictly of unmarked cars free of any Harvest branding and commercial cannabis insignia. Harvest's delivery vehicles will be designed to be non-descript and at no time will cannabis or cannabis products be visible from the exterior of the vehicle. Additionally, as previously stated, delivery personnel will not wear any clothing or symbols that indicate ownership, possession, or transportation of cannabis goods while making deliveries.

## Safety in Operations

### Delivery Fleet Maintenance

To promote driver safety, all delivery vehicles will receive regular maintenance and be maintained in good operating order. Mileage and maintenance logs will be created and updated to ensure that each vehicle receives required service in a timely manner and that all routine maintenance is conducted in accordance with manufacturer recommendations. Harvest will also conduct monthly internal inspections of delivery vehicles to ensure they are maintained in a clean and compliant condition. Each vehicle will have a copy of its vehicle registration, proof of insurance, and Harvest' cannabis business registration/license number in an easily accessible location, and all Harvest delivery vehicles will be insured and registered with the California Department of Motor Vehicles in accordance with applicable state and local laws and regulations. All Harvest vehicles delivering cannabis and cannabis products will have a valid motor carrier

permit pursuant to Chapter 2 (commencing with Section 34620) of Division 14.85 of the Vehicle Code.

### Cargo Theft Prevention Measures

The Delivery Manager, in coordination with the Director of Security, will develop and oversee implementation of policies, procedures, and best practices to mitigate cargo theft risk and promote driver safety. A key component of the Harvest approach to mitigation of cargo theft risk is the Director of Security's, coordination with law enforcement and third-party security advisors to identify "security risk geographies," meaning areas with high crime rates, resource deprivation, physical features facilitating concealment of criminal activity, or other conditions that could indicate greater risk of cargo theft and therefore should be avoided to the greatest degree possible in route design.

Cargo theft prevention measures will be updated as often as necessary and include, at a minimum:

- Regular employee briefings focused on awareness.
- Prohibition of unauthorized stops during delivery.
- Randomization of all delivery times and routes to prevent delivery interception or ambush. Such randomization will not allow a delivery employee to deviate from the requirement that a delivery driver travel directly from one delivery address to another or from the delivery address to the Retail Facility.
- Active vehicle monitoring using a dedicated global positioning system (GPS) location device for identifying the location of the vehicle at all times.
- Secure radio or satellite communication equipment to communicate with employees at all times when the vehicle contains cannabis goods.
- Utilization of hidden GPS locators in delivery containers.
- Use of non-descript vehicles with no markings that indicate the presence of cannabis or cannabis products.
- In-transit storage protocols.

As previously stated, vehicles used for the delivery of cannabis products will not bear Harvest's name or any markings that indicate the vehicle is being used to deliver cannabis goods.

### Strategic Route Planning

While making deliveries of cannabis goods, a delivery employee will only travel from Harvest's premises to the delivery address; from one delivery address to another delivery address; or from a delivery address back to Harvest licensed premises. Delivery personnel will travel in teams of two (2) at all times and will not deviate from the delivery path, except for necessary rest, fuel, or vehicle repair stops, or because road conditions make continued use of the route unsafe, impossible, or impracticable.

Delivery times and routes will be randomized, and deliveries will only be initiated during daylight hours. The Delivery Manager, in coordination with the Director of Security, will develop the delivery routes. Risk will be assessed in consultation with local law enforcement and environmental factors related to diversion. Routes will be planned with the intent to mitigate risk of harm to personnel, theft, and diversion. In the event Harvest identifies an increase in the risk of diversion or harm for a particular route, the following will be implemented, if determined necessary:

- Changing delivery vehicles.
- Using alternate routes and schedules.
- Adding additional escorts.
- Reducing the limit of cannabis goods delivered at one (1) time.
- Consulting with a third-party security advisor for additional recommended measures.

### Transportation Limitations

Harvest will only deliver cannabis in aggregate amounts as ordered by the customer and in compliance with individual purchasing limitations mandated by state law. To increase driver safety and decrease the likelihood that Harvest's delivery fleet may become a target of theft or diversion, Harvest delivery personnel will not carry more than three thousand dollars (\$3,000.00) worth of cannabis goods in any delivery vehicle at any one time. A manifest with all required information applicable to each pre-authorized cannabis good purchase will accompany each delivery vehicle at all times.

### Driver Preparedness

Before commencing a delivery route, the Delivery Manager will create a Trip Plan for each vehicle driver. In addition to the delivery manifest, a copy of each Trip Plan will be

placed in the vehicle and remain in the vehicle for the entire duration of each trip. The plan will include, but is not limited to the following information:

- The name of delivery employees conducting the delivery run.
- Expected date and start time of the trip.
- Anticipated route and deliver-to locations.
- Number of items in each package, and number of packages to be delivered each route.
- Expected arrival time(s).

### Incident Response and Required Reporting

Every delivery vehicle will have a Delivery Incident Log. In case of an emergency stop, a detailed report will be recorded in the log, describing the event, the duration, the location, and any activities of employees exiting the vehicle. Delivery personnel will report all delivery incidents to the Director of Security.

The Director of Security will report to the Bureau, the City of Santa Rosa and all other appropriate local authorities any vehicle accidents, diversion, losses, or other reportable incidents that occur during delivery including:

- Discrepancies identified during inventory, including diversion, theft, loss, and or criminal action in delivery operations.
- Any suspicious act involving the delivery of cannabis goods by any person.
- Unauthorized destruction of cannabis goods during delivery.
- Any loss or unauthorized alteration of records related to cannabis good delivery.
- Any other breach of security.

Harvest will immediately report any loss or theft of cannabis products to the Bureau and appropriate local authorities.

### PROCESS TO VERIFY DELIVERY IS TO A QUALIFIED PURCHASER AND LOCATION

Harvest is committed to preventing the diversion of cannabis goods to minors and to ensuring that all delivery operations are conducted in compliance with the rules set forth by the Bureau of Cannabis Control ("Bureau") and all applicable state and local laws, regulations, ordinances, and other requirements. As such, Harvest restricts availability of its delivery service to adult consumers twenty-one (21) years of age or older, and qualified patients eighteen (18) years of age or older who possess a valid government issued identification card, and either a valid county-issued identification card under



Section 11362. 712 of the Health and Safety Code or a valid physician's recommendation for himself or herself or for a person for whom he or she is a primary caregiver. Primary caregivers will be required to provide written documentation containing the signatures and the printed name of the medical cannabis patient designating the individual as a primary caregiver for a medical cannabis patient.

In order to maintain a safe and lawful establishment and to ensure full compliance with these policies, Harvest has created qualified purchaser verification procedures to guide our delivery request processing and fulfillment strategy. These procedures include wellness representative training, strategic order processing, dual identity and documentation verification protocols, and pre-dispatch electronic verification of proposed delivery addresses. Harvest's underage access prevention approach focuses on procedures and best practices for preventing unauthorized individuals from illegally accessing our facility or purchasing cannabis goods through our delivery service.

### Purchaser Eligibility Verification

#### Employee Training

All wellness representatives will receive age verification and diversion prevention training as part of their orientation program, as well as annually. Records of training will be kept in each wellness representative's personnel file. In-house age verification and diversion prevention training will include retail facility access procedures, the proper use of electronic identification verification equipment, visual identification inspection techniques, and suspicious behavior and incident identification and response. Employees may be asked to engage in role playing scenarios during training related to preventing underage purchases, such as asking for identification and explaining why there is a need to see one, declining delivery when an individual alleges to have forgotten approved identification or provides unapproved identification documentation, and the procedure for declining delivery of cannabis goods when there are concerns about identification being altered, fake, or misused.

Employees will also be trained on proper review and acceptance of patient identification cards and physician's recommendations during identification screening and verification, and to politely deny and explain the refusal of the provision of medical cannabis goods to individuals over the age of twenty-one (21) but who cannot provide adequate patient or caregiver documentation. Harvest will train its wellness representatives to screen and verify the identification of every individual seeking access to our boutique or attempting to accept a scheduled delivery. Wellness representatives will be instructed on how to convey company policy, which prohibits making assumptions of age based on physical

appearance or memory of past purchases while still providing unparalleled service and demonstrating our appreciation for loyal patronage. Management will implement internal compliance audits and inform all personnel during training that routine compliance checks will be conducted to assess compliance with company policy, laws, and best practices for under age access prevention. Harvest and its team of wellness representatives appreciate the importance of strict adherence to under-age access prevention procedures and understand that the use of minor decoys (individuals under the age of twenty-one who attempt access by carrying their own identification or no identification at all) by law enforcement is permitted to verify compliance with all age verification and access restriction laws. All wellness representatives will be required to sign an acknowledgement that they understand state law and Harvest's policies and procedures pertaining to the lawful sale of cannabis goods.

### Delivery Request Processing

Delivery requests for Harvest Retail Facility must be made 24-hours in advance via telephone or our online portal. If Harvest utilizes a web-based portal, this website will additionally require the user to mark a box indicating that he or she is at least eighteen (18) years of age or older to access the delivery processing webpage. As a prerequisite for an order to process, the following information must be provided:

- Date and time request was made.
- Customer's first and last name (as listed on identification to be used to validate delivery).
- Consumer's date of birth.
- Delivery address.
- Phone number.
- A detailed description of all cannabis goods requested for delivery. The description will include the weight, volume, or any other accurate measure of the amount of any cannabis goods requested.
- Date and time of requested delivery.
- Payment.

For the purposes of maintaining required confidentiality, only the first name of the customer and Harvest's assigned customer number will be displayed on the delivery request receipt and in any other documentation accompanying delivery personnel on any delivery route.

Wellness representatives responsible for taking phone orders will be trained to verify the date of birth and any required patient information provided over the phone, prior to

taking the order. Eligible purchasing age calendars will be available at the licensed premises to aid in this process. If a date of birth is provided via the phone or online portal which indicates the individual is unauthorized to purchase, the ordering process will cease and a record of all denied transactions will be created and maintained.

Prior to submitting an order for processing, the wellness representative will secondarily confirm with the prospective purchaser the accuracy of all information to be entered into the delivery processing system on the customer's behalf. Once the order is processed, the customer will be provided with an assigned customer number for the prospective delivery. Once all required information in the delivery request has been processed, a wellness representative will begin to prepare the order and create a delivery request receipt.

Harvest will not perform any delivery of cannabis goods without first generating a copy of the delivery request receipt for the prospective purchase through the statewide track and trace system. The delivery request receipt will accurately reflect the inventory being delivered from Harvest's Dispensary and will be produced in a format approved by the Bureau. Harvest will maintain copies of the requests while conducting deliveries.

The delivery request receipt must contain the following information:

- The name and address of Harvest's licensed Dispensary.
- The first name and employee number of the licensed retail employee who prepared the order for delivery.
- The first name of the customer and the Harvest-assigned customer number for the person who requested delivery.
- The name and employee number of the delivery employee who delivered the order.
- The date and time the delivery request was made.
- The complete delivery address.
- A detailed description of all cannabis goods requested for delivery. The description must include the weight, volume, or any other accurate measure of the amount of all cannabis goods requested.
- The total amount paid for the delivery, and the cost of cannabis goods, including any taxes or fees, and any other charges related to the delivery.
- Upon delivery, the date and time the delivery was made, and the signature of the person who received the delivery.

Once an order is prepared and verified, the requested cannabis goods will be placed in a sealed exit package to which a copy of the delivery request receipt will be affixed. The wellness representative preparing the package for delivery will independently confirm that order purchase is accurate, the products packaged align with the delivery request,

that the address provided on the delivery request receipt is for a permitted location in the state of California, and that delivery is not requested for a jurisdiction outside of Harvest's delivery range. Harvest delivery personnel must prepare and carry a delivery request receipt associated with each scheduled delivery, whether in electronic or hard-copy form, in addition to the receipt affixed to each exit package. Sealed exit packages will be placed in the secure, locked storage compartment inside the vehicle. As previously stated, loading of delivery vehicles will be performed in a limited access area under the supervision of security personnel and constant video surveillance.

### Delivery Protocol: Age Verification and Documentation Validation

Identification will be checked for every person seeking to receive delivered cannabis goods. A trained wellness representative will greet the prospective purchaser at the exterior of the requested delivery address and verify identification prior to removing the cannabis goods from the vehicle. As previously stated, all deliveries will be completed in teams of two (2) with the driver remaining inside the vehicle at all times, ensuring he or she is able to see and supervise the delivery transaction. Purchasers will be instructed to have their identification, assigned customer number, and any required additional documentation in-hand upon receiving the (5) five-minute notification of impending arrival.

Our wellness representatives will be trained and instructed on how to tactfully communicate to prospective purchasers that Harvest makes absolutely no assumptions of age based on physical appearance or memory of past purchases. Individuals who do not have or cannot provide identification will be denied delivery. California Code of Regulations 16 § 5402(b) specifies the types of documents that are acceptable proof of age for the purpose of purchasing cannabis goods from a Retailer in California.

Acceptable proof of identification is strictly limited to the following:

- A document issued by a federal, state, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to, a valid motor vehicle operator's license, that contains the name, date of birth, physical description, and photo of the person;
- A valid identification card issued to a member of the Armed Forces that includes a date of birth and a photo of the person; or
- A valid passport issued by the United States or by a foreign government.

Any valid proof of identification provided must clearly indicate the age or birthdate of the individual and display an unobstructed photo of the individual seeking access.

Acceptance, in exchange for delivery, of any proof of identification not listed above,



including the provision of multiple types of non-approved identification documentation, is prohibited. Further, anyone seeking to purchase medicinal cannabis goods must provide proof of age using one of the permitted forms of identification described above indicating that he or she is at least eighteen (18) years old as well as proof of a valid physician's recommendation or valid patient identification card, as required by California law.

Minors today easily acquire fake ID's and most fines resulting from sting operations are simply due to human error. As such, our Retail Facility will utilize visual inspection techniques and an electronic identification scanner to verify the proof of age of every person seeking to enter the licensed premises or purchase delivered cannabis goods. All wellness representatives will be trained on proper visual inspection techniques and the use of electronic identification verification equipment. The electronic identification verification scanner is a device capable of quickly and reliably confirming the validity of certain types of identification cards using computer processes. Harvest will utilize the Viage Cav-3200 ID Verification Scanner or another comparable device to supplement consumer screening and validation processes. This type of scanner is equipped with a magnetic stripe scanner, barcode scanner, and a 1D and 2D scanner of government issued driver licenses and identification cards for compatibility with all states. This type of technology can easily spot a fake or expired ID. A wellness representative can verify the validity of identification provided by swiping an identification card through the scanner (like a credit card processor), after which the screen will quickly display the person's age, date of birth, and expiration date.

However, physical inspection of identification is always required to confirm accuracy and judge the authenticity of the identification presented. Harvest wellness representatives are required to take physical control of the identification and require that it be taken out of wallets or covers for inspection, if applicable. Harvest's required age verification process cannot be completed with only the use of an electronic identification scanner verifying proof of age. Some forms of identification (e.g., passports) are not compatible for verification by certain electronic identification scanners. Furthermore, electronic identification scanners do not reject legal identification being used by another individual nor are they error proof at rejecting false identification. Identification machines are required to be used as a supplement to a representative's thorough visual inspection of the identification provided and an analysis as to whether the photo identification provided matches the individual seeking delivery of cannabis goods.

During physical inspection, a wellness representative will first complete a cursory visual review of the manufacturing quality of the identification provided. Employees will be trained and instructed to consistently analyze the identification for poorly cut corners, color bleed on the watermark or security features, bumpy surfaces, or tampering that is



indicative of the photo being replaced. Employees will also review the information printed on the identification document for signs of tampering. This includes checking the back of the identification for poor photocopy quality, digitized lettering, or any wording that indicates it is not issued by a branch of government. Employees must pay special attention to confirm the individual is old enough to purchase cannabis and that the identification has not been altered. Wellness representatives will be trained to use and provided with an identification verification guide for analyzing domestic and international documents. Once the identification provided is determined to be a valid government issued identification document, care will be taken to analyze and confirm that the individual seeking to use the identification provided for delivery, is in fact the individual identified on the document.

### Verification of Patient and Caregiver Documentation

If a delivery request for medicinal cannabis goods is processed, the wellness representative completing the delivery will first verify age and confirm the assigned customer number corresponds to the customer number provided by the recipient. Next, the delivery personnel will verify medicinal cannabis good purchasing eligibility. Patients over the age of eighteen (18) are additionally required to provide a valid county issued identification card under Section 11362.712 of the Health and Safety Code, or a valid physician's recommendation for himself or herself. If provided, delivery personnel will inspect the patient's Medical Marijuana Program identification card and verify that the photo identification and all information provided corresponds to the government identification provided by the prospective purchaser, and that the identification card is still valid. Delivery personnel will be trained on the proper and professional verification procedure for physician recommendation verification.

Primary caregivers are likewise required to provide proof of age and identity and must provide a valid physician's recommendation for the person for whom he or she is a primary caregiver. Caregivers who present a physician's recommendation for the patient for whom he or she provides care will also be required to provide written documentation containing the signatures and the printed name of the medicinal cannabis patient designating the individual as a primary caregiver for a medicinal cannabis patient.

### Patient Confidentiality

Harvest understands that information contained in a physician's recommendation issued in accordance with Article 25 (commencing with Section 2525) of Chapter 5 of Division

2 and received by a licensee, including, but not limited to, the name, address, or social security number of the patient, the patient's medical condition, or the name of the patient's primary caregiver is deemed "medical information" within the meaning of the Confidentiality of Medical Information Act (Part 2.6 (commencing with Section 56) of Division 1 of the Civil Code) and shall not be disclosed by a licensee except as necessary for authorized employees of the State of California or any city, county, or city and county to perform official duties pursuant to this chapter, or a local ordinance. For the purposes of maintaining required confidentiality of personal information, only the first name of the customer and Harvest's assigned customer number will be displayed on the delivery request receipt and in any other documentation accompanying delivery personnel on any delivery route.

### Pre-Dispatch Delivery ADDRESS VERIFICATION

As previously stated, Harvest restricts its delivery service offerings to lawful cannabis consumers at any eligible physical address within our City of Santa Rosa and surrounding area delivery radius. Prospective customers will be required to provide the complete delivery address including, street address, zip code, and state, as a prerequisite to placing an order. The wellness representative responsible for processing the order will input the address into Google Maps or a similar mapping software prior to taking any orders for cannabis goods to ensure that the location provided is accurate, corresponds to a physical address, and is located within Harvest's delivery radius. Harvest will not accept or process any deliveries requested out of the state of California, or to which an address cannot be identified using mapping software. Further, the wellness representative responsible for preparing the order for dispatch will independently review the delivery request receipt to ensure delivery is scheduled for a permitted address. Harvest will not deliver cannabis goods to an address located on publicly owned land or any address on land or in a building leased by a public agency. This prohibition on delivery includes land held in trust by the United States for a tribe or an individual tribal member unless the delivery is authorized by and consistent with applicable tribal law. Harvest employees will not leave the State of California while possessing cannabis products.

### PROCESS TO TRACK AND MAINTAIN COMMUNICATION WITH DELIVERY PERSONNEL AT ALL TIMES

Harvest will use mobile and dedicated GPS tracking equipment to monitor and track the location of delivery personnel and the delivery fleet at all times. Additionally, Harvest will maintain communication with delivery personnel at all times through the utilization of

radio communication equipment in addition to requiring its employees to carry charged and functioning cell phones while performing deliveries.

Delivery personnel will have access to a secure form of communication with a security officer at the licensed premises at all times via two-way radio communication equipment installed in each of Harvest's delivery vehicles. The Director of Security or his/her assigned designee will ensure all delivery personnel are trained appropriately on its use and that the system is fully functioning prior to the commencement of each day's delivery operations.

Delivery Personnel will adhere to the following procedures whenever using radio equipment:

- The "Delivery" channel will only be used for delivery operations.
- The delivery vehicle will perform a radio check-in every hour on the hour while delivering cannabis products.
- If any suspicious activity occurs during delivery, the delivery employee will maintain radio communication during the event to report all details to the Facility.
- Both employees performing deliveries will be required to carry cell phones with GPS tracking enabled at all times while making deliveries.
- If two-way radio communication fails for any reason, the employee will make contact by cell phone immediately after a communication failure.

As previously stated, in addition to radio communication equipment and the requirement that all delivery personnel carry GPS-equipped phones while performing deliveries, a dedicated GPS device will be affixed to the delivery vehicle during delivery and will remain active and inside of the delivery vehicle at all times. Harvest' dedicated vehicle GPS devices will provide real-time tracking of the geographic location of all delivery vehicles actively engaging in delivery services for consumers, and all GPS tracking information will be made available to the Bureau and law enforcement upon request. If the dedicated vehicle GPS ceases to function for any reason, Harvest will maintain tracking of delivery personnel through GPS-enabled cellular devices set to share the location of the device with Harvest's business cell-phone dedicated for use by security staff.

### PROCESS TO VERIFY DELIVERIES AND PROVIDE ACCURATE MANIFESTS FOR AUDITING

Harvest implements the use of multi-phase independent verification technique in addition to comprehensive creation and maintenance of electronic records and supporting documentation to confirm deliveries are conducted in compliance with the rules set forth by the Bureau, the City of Santa Rosa and all other applicable state and

local laws, to verify deliveries, and to provide accurate manifests for auditing. Below is an overview of Harvest's delivery and manifest records accuracy and retention practices. For more detailed information on Harvest's recordkeeping protocols and implemented measures please consult Section 3, Part D, Records and Inventory, of this application.

#### Verification of Deliveries

Prior to submitting a delivery order for processing, the wellness representative will confirm with the prospective purchaser the accuracy of all information to be entered into the delivery processing system on the customer's behalf. All delivery requests will be processed electronically and records of all requests will be retained in Harvest's point of sale and electronic inventory tracking systems. Harvest will maintain a list of all deliveries, including the address delivered to, the amount and type of product delivered, and any other information in hardcopy and electronic form, for a minimum of seven (7) years as required by the Bureau.

Once an order is prepared and verified, the requested cannabis goods will be placed in a sealed exit package to which a copy of the delivery request receipt will be affixed. The wellness representative preparing the package for delivery will independently confirm that order purchase is accurate, consistent with the delivery request, that the address provided on the delivery request receipt is for a permitted location in the state of California, and that delivery is not requested for a jurisdiction outside of Harvest's delivery range.

Once delivery has been dispatched and the wellness representative has confirmed that the customer is eligible to purchase the cannabis goods requested, the delivery employee will give the customer the opportunity to verify the accuracy of the delivery as described on the delivery request receipt. The recipient will be asked to initial each line item on the invoice, then place his/her full signature at the bottom of the receipt to indicate receipt of the merchandise as documented on the delivery request receipt.

The customer who placed the order will be given and instructed to keep a copy of the delivery request receipt, and delivery personnel will retain a signed copy of the delivery request receipt for Harvest's records. The delivery personnel will instruct the purchaser that he or she must maintain a physical or electronic copy of the delivery request and make it available upon request by the licensing authority and law enforcement officers. All documentation will be placed back in the lock box to prevent document-tampering or theft and will be uploaded to the electronic tracking systems once the delivery personnel returns to the licensed premises. All copies of delivery requests will be readily accessible from Harvest's licensed premises for a minimum of seven (7) years following



the date of the scheduled delivery, and all delivery requests and delivery records will be made available to the licensing authority and law enforcement officers, upon request.

Harvest will ensure that all delivery requests receipts are uploaded and maintained electronically in the statewide track and trace system and that each receipt contains, at a minimum, the following information:

- The name and address of Harvest' licensed Dispensary.
- The first name and employee number of the licensed retail employee who prepared the order for delivery.
- The first name of the customer and the Harvest-assigned customer number for the person who requested delivery.
- The name and employee number of the delivery employee who delivered the order.
- The date and time the delivery request was made.
- The complete delivery address.
- A detailed description of all cannabis goods requested for delivery. The description must include the weight, volume, or any other accurate measure of the amount of all cannabis goods requested.
- The total amount paid for the delivery, and the cost of cannabis goods, including any taxes or fees, and any other charges related to the delivery.
- Upon delivery, the date and time the delivery was made, and the signature of the person who received the delivery.

### Maintenance and Provision of Accurate Manifests for Auditing

Harvest will maintain complete, accurate, current, legible, and comprehensive books and records on-site at its Retail Facility that render, balance and evidence all activities (from receipt of sale to delivery or disposal). Harvest's standard operating procedures will detail the maintenance of accurate records of commercial cannabis activity and address measures for reporting any loss or unauthorized alteration of records. Our recordkeeping will include all necessary books and records required to render a full account of all commercial cannabis operations at Harvest's Facility for the year-to-date and the seven (7) years prior, as required by the licensing authorities, in both hard and electronic copy. All required records, identified by the licensing authorities, will be secured in a storage area where the records are protected from debris, moisture, contamination, hazardous waste, fire, and theft.

Harvest's third-party seed to sale tracking system, MJ Freeway', is a Platform ERP software hosted on cloud-based servers that collect all sales information, patient information, caregiver information, and purchase transaction information. The third-party seed to sale tracking system will have complete interoperability with the State's



mandated seed to sale tracking system and the use of this system will not hinder Harvest's ability to enter all required information into the State's seed to sale tracking system in a timely manner. The database stores sales information including patient identifiers, product display name, product identifiers, form, and quantity sold. Every transaction, such as a sale, purchase order, delivery, movement of inventory, inventory adjustment, and inventory reconciliation is serialized and recoverable on-demand and retrieved in seconds. This data lives in the Platform system through the life of the system. At minimum, Harvest will utilize the statewide track and trace system and MJ Freeway to do the following:

- Monitor business activities, inventories, transportation and sales transactions.
- Record details about the retail process and inventory management activities in accordance with internal company policy.
- Enter required information regarding acquisition, inventory management, packaging and labeling, distribution, delivery, and sale in the statewide track and trace system in accordance with applicable statutes and regulations.
- Maintain data regarding from whom goods were received, the type and amount of goods received, the party who hold title to the goods and the UIDs or lot number of the goods.
- Generate reports on demand.

The Bureau, the City, other licensing authorities may examine and perform audits of Harvest's records as the licensing authority, or a state or local agency, deems necessary to perform its duties under this division. Delivery records and manifests will be kept in a manner that allows the records to be produced for the Bureau and the City by Harvest within 24 hours in either hard copy or electronic form, whichever is requested. Harvest will maintain electronic storage of all required records of sales, delivery, manifests, patient information, and inventory which can be provided to the city upon request. Harvest will provide and deliver records to the Bureau and the City upon request. The Chief Operating Officer and Director of Retail Operations, in coordination with the Delivery Manager, will ensure all delivery documentation, including manifests and receipts are maintained in accordance with Harvest's procedures and with the rules set forth by the Bureau, the City, and all applicable state and local laws, regulations, ordinances, and other requirements. Harvest will have a plan set forth for these audits and all employees will fully cooperate with the requirements of such inspections in a timely manner.

### Vehicle Records

The Delivery Manager will ensure the following information for each vehicle delivering cannabis goods is maintained on-site in Harvest's electronic fleet management system records:

- Vehicle Identification Number.
- Vehicle make, model, model year and color.
- License plate number.
- Date of vehicle registration.
- Registration renewal date.
- Insurance information, including expiration date.
- GPS tracking information, including odometer readings of each trip.
- Preventive maintenance schedule and completion dates.
- Any mechanical or body work and completion dates.

Upon request, Harvest will provide the following information to the Bureau, the City of Santa Rosa and any other authorized government representative regarding its commercial delivery fleet.

- Vehicle make, model, and color.
- Vehicle Identification Number.
- License plate number.
- Department of Motor Vehicle's registration information.
- Insurance policy.

All delivery vehicles will be clean and maintained in good operating order. Each vehicle will have a copy of its vehicle registration, proof of insurance, and Harvest' cannabis business registration/license number in an easily accessible location in the vehicle. Additionally, copies of delivery request receipts generated through the inventory tracking system and Trip Plans will be kept in the vehicle for each delivery run. Harvest will maintain accurate and complete records regarding all delivery activities, and no material changes will be made to the delivery service procedures without written approval from the Bureau and the City of Santa Rosa.

### RESTRICTED SALES & NO ON-SITE CONSUMPTION

There shall be no sale or sale to any person not in possession of a valid identification card denoting the person as a qualified patient or a caregiver as defined by law. Our Point of Sale system has built in transaction limits to prevent any sale from exceeding California state regulation. There will be no facilities for on-site consumption and the

consumption of all alcohol and cannabis products on site is strictly prohibited. Prohibition of on-site consumption will also be addressed via a physical sign on the building stating " No Loitering, Public drinking or Public Smoking/Consumption of Cannabis".

Extensive safety precautions are integrated into every aspect of the Harvest's policies and procedures as well as our facility's design and construction. Employees will manage the parking experience, the walk to the building entrance, and entrance into Harvest. The entire building will be surrounded by state of the art security cameras and alarm systems, and will be constantly monitored by Harvest employees including security guards. The interior the dispensary facility will be designed and constructed with patron safety and regulatory compliance as the primary objectives. Outside of hours of operation, all cannabis, cannabis products, and cash will be stored in a fire-proof vault with motion sensors and vibration detectors to deter any criminal activity.

Harvest's robust security measures maximize safety and minimize the risk of diversion, loss, or theft of cannabis and cannabis products. All security measures will be reasonably designed to prevent unauthorized entrance into the dispensary facility and areas containing cannabis or cannabis products, as well as provide assurance that both patron and employee behavior does not detract from the quality of life for adjoining residents, property owners, and businesses.

Individuals will be prohibited from loitering or remaining on Harvest's premises if they are not or will not be actively engaging in the authorized purchase of cannabis goods or any other activity expressly related to the operations of Harvest. "No Loitering, Public Drinking, or Public Smoking/Consumption of Cannabis" signs will be posted in and outside of the dispensary facility. Additionally, at least two security guards will be on site during all hours of operation to monitor the site and the immediate vicinity of the site to ensure that patrons immediately leave the site and do not consume cannabis in the vicinity of the dispensary or on the property or in the parking lot. Harvest will never allow sales through an exterior opening such as a drive through or walk-up window, and Harvest will never allow sales through a vending machine. Harvest will not engage in cash checking. There will be no onsite sales of alcohol or tobacco products, and no onsite consumption of food, alcohol or tobacco products by patrons.

Other security measures will include, but not be limited to, all of the following:

- Ensuring that Harvest's premises and associated parking area, including the adjacent area under the control of Harvest and any sidewalk or alley, will be maintained in an attractive condition and kept free of obstruction, trash, litter, and debris at all times. In the event that vandalism in the form of graffiti occurs, it will be removed or painted over within 24 hours.
- Adequately illuminating the exterior of the building in the evening.
- Establishing secure areas accessible only to authorized personnel.
- Utilizing state-of-the-art alarm and video surveillance equipment, including a panic alarm, meaning a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress.
- Storing all finished cannabis and cannabis products in a secured and locked vault in a manner reasonably designed to prevent diversion, theft, and loss.
- Storing all cash in a secured vault to prevent theft and utilizing dye packs to mark money in the event that it is stolen.
- Utilizing one door for patron access to simplify check-in and monitoring of consumer entry and exit. All other doors will be equipped with an automatic locking device and will be kept closed at all times when not in use by Harvest personnel.
- All exterior facing doors will be solid, commercial-grade.

Security equipment will be inspected and tested in regular intervals, not to exceed 30 calendar days from the previous inspection and test. The Safety and Security Compliance Director will log all inspection and test results. We will perform annual preventative maintenance on the system by an approved vendor. In addition, we maintain emergency protocols for securing currency and cannabis goods following any detected diversion, theft or loss, which includes immediate reporting to the Safety and Security Compliance Director and law enforcement and an internal investigation with accurate recordkeeping.

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## PERFORMANCE TIMELINE

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### **Prior to April 20, 2018**

#### Facility Construction

During the application process, we finalized the architectural design of the dispensary facility, including:

- ☐ Building plans
- ☐ Security plan, specifications, and equipment
- ☐ ADA compliance
- ☐ Parking
- ☐ Employee break room and lockers
- ☐ Educational space
- ☐ Vault storage
- ☐ Secure garage for product receiving and loading
- ☐ Product flow
- ☐ General equipment determination

We also verified zoning compliance with the local municipality.

### **April, 2018 to License Award (est. to be Sep/Oct/Nov 2018)**

#### Facility Construction

After submitting the application, we will:

- ☐ Schedule a pre-application meeting with the City
- ☐ Complete construction documents and engineering
- ☐ Begin the building permit process by submitting final construction drawings to the City

This will give us ample time to incorporate comments from the City and finalize building design, including:

- ☐ Architectural construction drawings
- ☐ Structural drawings
- ☐ Mechanical, electrical, and plumbing construction drawings
- ☐ City building permit
- ☐ Health Department permit
- ☐ State Fire permit

Taking these steps will ensure we are prepared to begin construction immediately if we are awarded a license.

### **By November, 2018**

#### Facility Construction



If we are awarded a license we will be prepared to immediately pull the building permit and begin construction. At this time, we will also contact the State to set a tentative date for final inspection to ensure any delays in the inspection process do not hinder our ability to operate within six months.

We will mobilize our construction team on site within one week of award, including:

- ☐ Installation of:
  - ☐ Temporary fencing
  - ☐ Temporary security
  - ☐ Construction office
  - ☐ Temporary toilets
  - ☐ Dumpster
- ☐ Execution of:
  - ☐ Storm water Pollution Prevention Plan
  - ☐ Subcontracts
- ☐ Schedule all trades
- ☐ Mobilize demolition subcontractor

### **November 16, 2018 to August 30, 2018**

#### **Facility Construction**

The first two weeks of the construction process will entail performing any required demolition and ordering long-lead equipment, including:

- ☐ Bullet-proof glass
- ☐ Millwork
- ☐ HVAC
- ☐ Lighting
- ☐ Electrical sections
- ☐ Controls
- ☐ Security equipment

Any delays experienced with the delivery of long-lead equipment can be mitigated as we have relationships with multiple vendors that have provided this equipment through our operations in seven states, including our Pennsylvania dispensary, and if necessary we can ship equipment currently in our possession to the proposed Pennsylvania dispensary.

#### **Human Resources**

During this time, the Director of Human Resources will discern the requirements for each department, disseminate related information to existing department heads so that they may begin to prepare for employee training, and begin creating partnerships with organizations to gain access to the local labor pool with an emphasis on those that promote the hiring of diverse job candidates.

### **November 30, 2018 to December 21, 2018**

#### **Facility Construction**

After demolition, approximately three weeks will be spent installing underground plumbing, such as floor drains, sewer, and floor sinks. Preparations will also begin for the vault, which will be used to securely store all medical cannabis products. These preparations will include:

- ☐ Selective saw cutting and removing concrete for vault wall footings and drains
- ☐ Concrete footing reinforcing
- ☐ Underground plumbing
- ☐ In-floor drains and floor sinks
- ☐ Complete underground building inspections
- ☐ Pour back concrete

## **December 21, 2018 to January 11, 2019**

### **Facility Construction**

Approximately three weeks will be required to complete walls, including:

- ☐ Metal framing
- ☐ Specialties backing and blocking
- ☐ Vault walls and conduit
- ☐ Structural HVAC support
- ☐ Complete framing inspections

During framing we will start above ceiling mechanical, electrical, and plumbing, including:

- ☐ Routing roof drains
- ☐ Plumbing
- ☐ Electrical conduit
- ☐ Fire sprinkler
- ☐ Ductwork
- ☐ Complete above-ceiling inspections

## **January 11, 2019 to February 8, 2019**

### **Facility Construction**

Rough mechanical, electrical, and plumbing will continue for approximately one month, including:

- ☐ Plumbing top-out
- ☐ In-wall power and low-voltage conduit
- ☐ In-wall HVAC
- ☐ Fire sprinkler
- ☐ Fire alarm cabling
- ☐ Controls cabling
- ☐ Complete in-wall inspections
- ☐ Wall and ceiling insulation
- ☐ Set electrical gear and main distribution
- ☐ Set HVAC equipment
- ☐ Odor filtration

## **February 8, 2019 to March 1, 2019**

### **Facility Construction**

Wall, ceiling, and floor finishes will be installed over approximately three weeks, including:

- ☐ Moisture resistant, antimicrobial drywall
  - ☐ Complete drywall screw inspections
  - ☐ Tape and finish walls
- ☐ Antimicrobial epoxy paint for walls
- ☐ Fiberglass reinforced washable wall panels
- ☐ Antimicrobial floor coating

### **Human Resources**

Job advertisements for specific positions will be posted on large online platforms (e.g., Indeed, LinkedIn) and in local outlets such as newspapers, magazines, and radio stations. Media coverage will also be secured, such as newspaper and television reports announcing job availability.

## **March 1, 2019 to March 22, 2019**

### **Facility Construction**

Installing mechanical, electrical, and plumbing trim will take approximately three weeks, and will include:

- ☐ Switches and outlets
- ☐ HVAC diffusers
- ☐ Sinks and faucets
- ☐ Fire sprinkler trim
- ☐ Fire alarm trim
- ☐ Sensors and controls

### **March 22, 2019 to April 19, 2019**

#### **Facility Construction**

It will take approximately one month to install large equipment, including:

- ☐ Security equipment and devices
- ☐ HVAC
- ☐ Millwork
- ☐ Bulletproof glass
- ☐ Secure displays

#### **Operational Preparations**

All supplies necessary for full operation will be ordered at this time, including:

- ☐ Office supplies
- ☐ Computer equipment and peripherals
- ☐ Paper and ink
- ☐ Stools and chairs
- ☐ Cushioned floor mats
- ☐ Storage racks
- ☐ Work tables
- ☐ Employee lockers
- ☐ Safe
- ☐ Cleaning supplies
- ☐ Restroom and handwashing supplies
- ☐ Name badges
- ☐ Staff apparel
- ☐ Breakroom supplies
  - ☐ Dishes
  - ☐ Utensils
  - ☐ Appliances
  - ☐ Tables and chairs
  - ☐ Food storage containers

We will also set up account services for the Department-approved inventory tracking and point of sale system, MJ Freeway.

### **April 19, 2019 to May 3, 2019**

#### **Facility Construction**

Approximately two weeks will be spent testing and troubleshooting the security and inventory management systems. To ensure proper operation and State compliance, a third-party agent will commission and certify all equipment including:

- ☐ HVAC
- ☐ Security
- ☐ Fire alarm

- ☐ Computer network

In addition, an initial pest inspection of the dispensary will be conducted. Recordings of the following will be made in the Integrated Pest Management Monitoring Log:

- ☐ Type of pests
- ☐ Number of each pest
- ☐ Location of pests
- ☐ Any existing damage and from what pest
- ☐ Potential harboring areas
- ☐ Potential points of pest entry

If the pest population is found to exceed the action threshold, pest control measures will be implemented specific to the pest found.

### Operational Preparations

We will install all computer equipment, Internet, and peripherals, and will install and troubleshoot MJ Freeway.

### May 3, 2019

Approximately two weeks before operation a representative from the State will be invited to inspect the site to ensure full compliance with Pennsylvania regulations.

### May 3, 2019 to May 17, 2019

A two-week contingency period will be used to remedy any deficiencies identified by the inspector. A State representative will be invited to conduct a final inspection, if necessary.

### Human Resources

One week before operation, new hires will undergo a three-day onboarding, orientation, and training session, which will cover policies and procedures relevant to the dispensing, handling, testing, transporting, and disposing of medical cannabis and medical cannabis products, including:

- ☐ Company values and culture
- ☐ Employee handbook review
- ☐ Payroll and benefits
- ☐ Human resources
- ☐ Pennsylvania compliance and operating requirements
- ☐ HIPAA compliance
- ☐ Position overviews
- ☐ Patient flow
- ☐ The patient experience
- ☐ Product overview
- ☐ Product flow
- ☐ Sanitation and hygiene
- ☐ Integrated Pest Management
- ☐ Diversion prevention and detection
- ☐ Safety and security
- ☐ Proper product storage (vault storage, environmental controls, etc.)
- ☐ Transportation protocols, including Two Person Integrity policies
- ☐ Inventory management, including:
  - ☐ Procedures for using MJ Freeway
  - ☐ Inventory audits
  - ☐ Product intake
  - ☐ Product recalls
- ☐ Access limitations

- ☐ Product inspection and testing
- ☐ Packaging and labeling
- ☐ Recordkeeping
- ☐ Laboratory testing
- ☐ Community outreach
- ☐ Marketing and advertising

After the three-day orientation, employees will undergo four days of hands-on training at the proposed dispensary in preparation for opening.

#### Operational Preparations

After gaining Department approval, the dispensary will accept medical cannabis products from vendors. These products will be logged into the electronic tracking system and stored securely in the vault until the date of initial operation.



## NEIGHBORHOOD COMPATABILITY

### Clear and Attractive Entrance

Columns have been erected along the major roadway adjacent to the dispensary (Santa Rosa Avenue), which mark a clear and visible entrance to the parking area. These columns are adorned with vegetation, increasing the attractiveness of the structure. The first image below shows the entrance to the parking area from the vantage of the adjacent sidewalk. The second image shows the entrance as viewed from within the parking area.





The entrance to the dispensary faces the parking area, providing clear, convenient access, as shown in the image below.





### Pedestrian Orientation

The eastern face of the dispensary facility adjoins Santa Ana Avenue, on which there is a pedestrian sidewalk. This area is decorated with wood accents and vegetation matching that adorning the parking area columns, creating an attractive façade that beautifies the surrounding area (see image below).



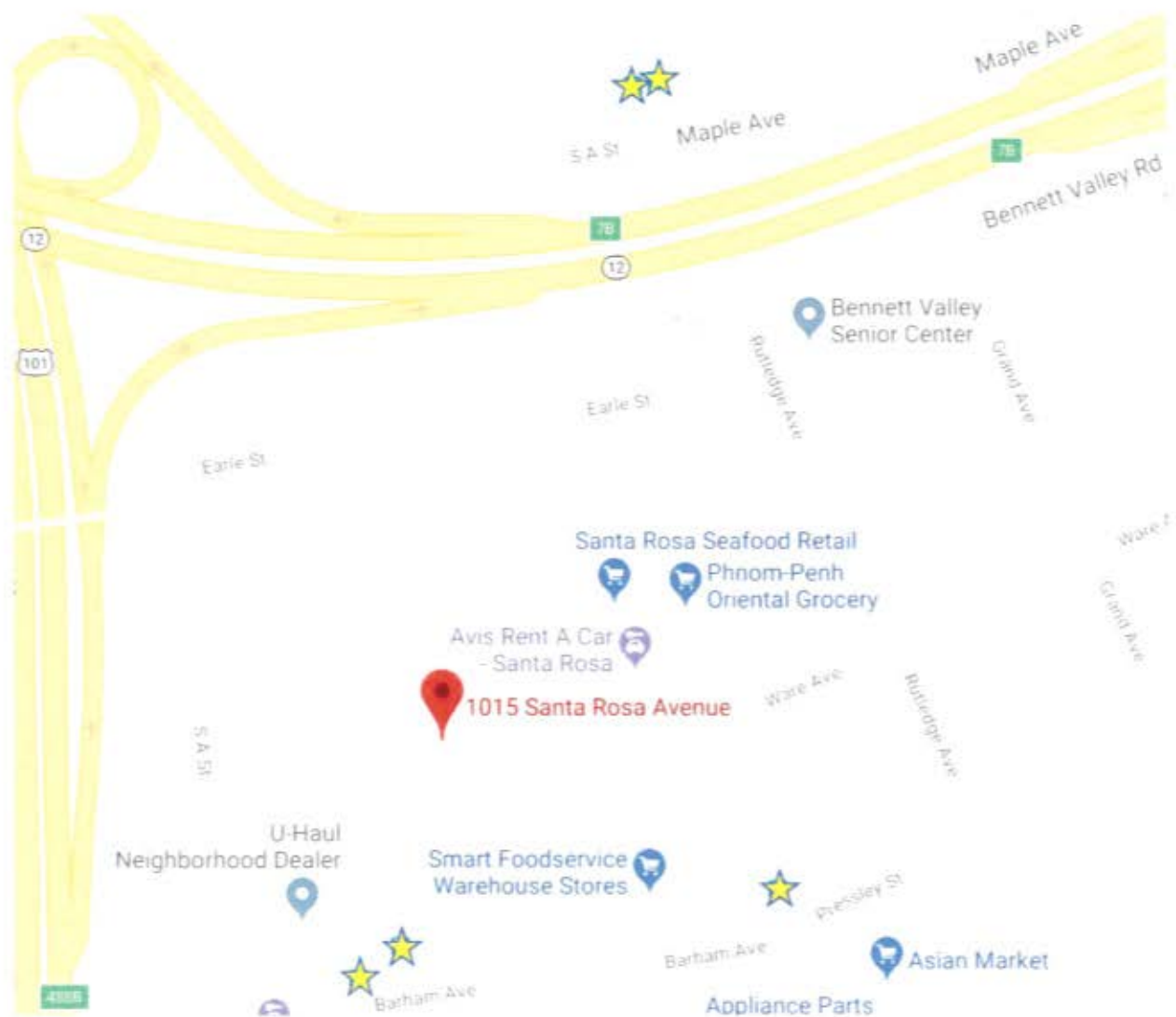
### Bike Parking

A rack will be installed next to the entrance to provide a space for patients and customers to securely fasten their bicycles. Room will be provided for up to 10 bikes. The image below illustrates the location of the proposed bike rack (yellow highlighted area).



### Access to Transit

There are five Santa Rosa City Bus bus stops within a five-minute walk of the proposed dispensary, as shown in the image below (yellow stars mark bus stops). These stops are part of the Santa Rosa Avenue (Route 3) and Petaluma Hill Road (Route 5) bus routes, which provide convenient access throughout the southern part of Santa Rosa and connections to bus routes that service the entire city. These stops are also utilized by the Sonoma County Transit bus system, specifically the Petaluma, JC, SSU, Santa Rosa lines (routes 44, 48, and 54) and the Santa Rosa, Sonoma State University, Cotati Depot line (route 46), providing additional access throughout the city and neighboring communities (e.g., Rohnert Park, Petaluma, etc.).





## HOW WE WILL FIT INTO THE STABILITY AND QUALITY OF THE SURROUNDING NEIGHBORHOOD

We are committed to the peace of mind of our staff, patients, and community members. Although many individuals may be hesitant to welcome a medical cannabis dispensary into their community, we believe our record of success speaks for itself. We presently hold 37 medical cannabis licenses in seven states, including 17 operating dispensaries totaling over 23 years of cumulative dispensary operation. We have served hundreds of thousands of patients and have conducted millions of transactions without a single complaint from a business or community neighbor and without experiencing a security incident. We are confident that we will have the same success at our proposed Santa Rosa dispensary.

### Parking

The dispensary will have 16 parking spaces, including one space designated for individuals with disabilities, providing ample parking for patients and consumers to ensure they do not park their vehicles at surrounding businesses. We will also provide a rack for securing up to 10 bicycles for patrons who choose to use alternative transport. Harvest will commit to making changes in regard to providing employee parking at the back of the property at such a time that we have control of the property and an indication that our application is moving forward. Please see the image below for a site plan illustrating vehicle and bicycle parking areas.



## Security

Americans for Safe Access, in their 2011 Dispensary Report, cited dozens of officials who have stated, unequivocally, that crime decreases in the immediate vicinity of new dispensaries, as additional foot traffic, lighting, and security measures discourage criminal activity. In addition, federally funded research conducted by scientists at the University of California, Los Angeles showed that there is no relation between the density of medical cannabis dispensaries and violent or property crime rates. Other research conducted by the same group showed that there are also steps that can be taken to further reduce any potential negative impact on the surrounding area:

- Employing a dispensary agent as a visible presence outside of the dispensary entrance was related to significantly lower crime rates within 250 feet of the dispensary. Although not statistically significant, dispensaries employing such an individual also had lower crime rates up to 1,000 feet from the dispensary.
- Installing visible security cameras was related to significantly lower crime rates within 250 feet of the dispensary.
- Posting signs that proper identification and authorization were required to purchase cannabis was related to significantly lower crime rates within 250 feet of the dispensary, and although not statistically significant, were related to lower crime rates within 1,000 feet of the dispensary.

We presently implement all of these strategies in our existing dispensary operations and will employ these strategies at the proposed Santa Rosa dispensary location to reduce any potential negative impact on the surrounding community and businesses.

Additionally upon having control of the property and an indication that our application is moving forward, Harvest is committed to make modifications and take security measures (i.e. fencing along A street) that will address issues of access to the property.

## Environmental Impact

Minimal environmental impact is imperative for preserving the beauty of Santa Rosa, its surrounding communities, and the State of California. Our goal is to be a leader in environmentally sustainable practices within the cannabis industry, benefitting the community through the following eco-conscious construction and operating practices.

### Dispensary Construction

We will adhere to the following environmentally-friendly construction practices:

- Use locally sourced construction materials to reduce transportation emissions
- Use rapidly renewable resources for building materials (e.g., bamboo, cork) and, when possible, that contain at least 10% recycled materials
- Install a cool roof to reduce summer cooling needs

- Install Energy Star-rated appliances, computers, monitors, and peripherals
- Install LED lighting
- Install motion sensors that automatically extinguish lights in rooms in which people are not present
- Install high efficiency plumbing fixtures and low-flow toilets

### **Product Sourcing**

An integral part of reducing our environmental impact will be sourcing cannabis from facilities that demonstrate environmentally friendly operations, such as:

- Greenhouse Cultivation: Greenhouses maximize natural air and sunlight during the cultivation process, resulting in less energy use than an indoor facility
- LED Lighting: LED PL lights reduce energy use by up to 66%
- Environmentally-Friendly Packaging: Minimal packaging or packaging that uses recycled materials will reduce environmental impact

Our existing facilities are zero-waste and reuse all water and byproducts in the cultivation process. Knowledge gained from operating those facilities will provide an understanding of water and resource conservation, which we will use to determine from which facilities to source cannabis products in California.

### **Alternative Transportation**

We will install bike racks outside of the proposed dispensary to provide a secure space for patients and customers to park bicycles, scooters, and other self-propelled transportation equipment.

### **Minimizing Environmental Impact in the Dispensary**

As an environmentally responsible business, we will implement practices that reduce our environmental impact, including:

- Turning off computers, peripherals, and other equipment when not in use
- Using a programmable thermostat to reduce energy use during non-business hours
- Using recycled materials and other products as often as is practicable
- Implementing an in-house recycling program
- Utilizing cleaning and sanitizing agents that are EPA-registered

### **Communication**

Signs reminding employees to remain environmentally conscious will be posted throughout the dispensary, particularly the bathrooms and break room, communicating the importance of minimizing paper product use, the use of disposable containers, and water and electricity usage.

## Community Impact

We have a long history of community outreach and support. Since 2013, we have donated over \$400,000 to local charitable organizations veterans, seniors, and patients in need. In addition, we have devoted considerable resources to making connections and providing resources to individuals and organizations in our local communities.

Below are brief descriptions of how we have collaborated with local organizations in other areas in which we operate. We hope to do the same in Santa Rosa if permitted to operate a medical cannabis dispensary.

### **Epilepsy Foundation of Arizona**

We have worked closely with the Epilepsy Foundation of Arizona (EFAZ) since 2014. Representatives from our dispensaries have given guest lectures on cannabis therapies for seizure disorders at Phoenix area EFAZ support groups and have served as volunteer counselors with the EFAZ youth summer camp program, Camp Candlelight, for three consecutive years. Finally, we have attended and sponsored the annual EFAZ Fundraising Gala since 2014, and have sponsored the annual EFAZ 5K run, hosting an educational table at the event.

### **Quality Connections**

Quality Connections is a non-profit organization that provides employment for people with special needs. We have collaborated with Quality Connections to employ approximately 40 persons with disabling conditions at our facilities, giving those individuals an opportunity to withdraw from government aid and create economic growth and a sense of identity for a population that tends to fall behind both financially and socially.

### **Help Me PTSD**

In 2015, a retired Army veteran and founder of Help Me PTSD approached our organization seeking sponsorship and a speaker for his PTSD expo and workshop. Since then we have collaborated on two additional workshops, one of which was hosted at one of our dispensaries.

### **Other Collaborative Work**

Other organizations with which we have collaborated include:

- Epilepsy Foundation of Nevada
- Friends of Parkinson's
- The Justa Center for Homeless Seniors
- Paradise Senior Living Center
- The Cancer Support Community of Phoenix

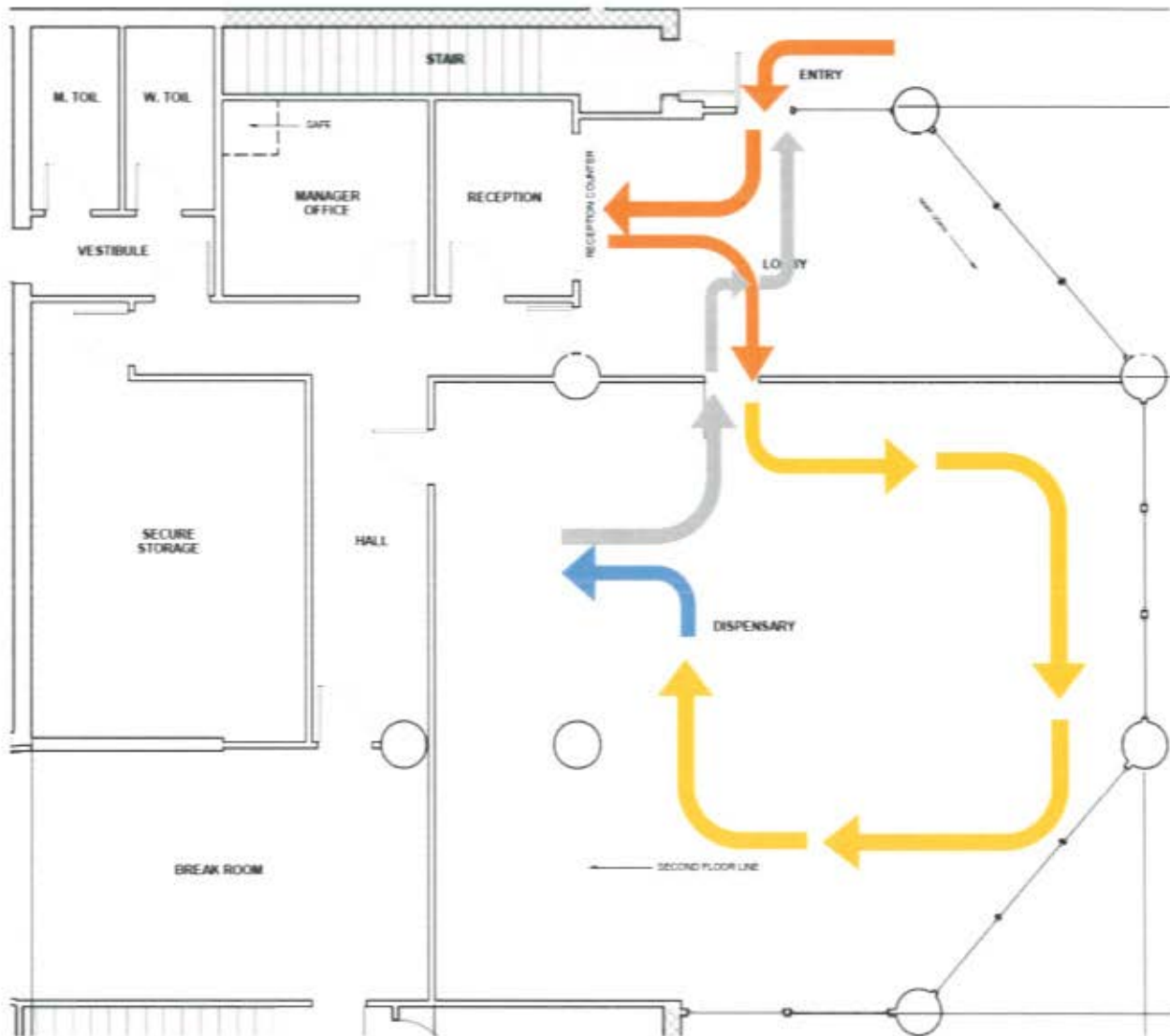
- The Southwest Chapter of the Crohn's and Colitis Foundation of America
- Xico Art and Culture
- United Food Bank



## ENHANCED RETAIL EXPERIENCE

### Patient Flow

Our goal is to provide a flexible retail experience that meets the needs of all patients and consumers. The floorplan below illustrates typical patient flow within the dispensary.



### Lobby (Orange Arrows)

When a patient arrives, the greeter will open the door and welcome him/her into the lobby. This area comprises a small portion of the dispensary space, as our objective is to quickly verify the patient's/consumer's required identification card and welcome him/her onto the sales floor, minimizing wait time before consultation.

### **Sales Floor (Yellow Arrows)**

After the receptionist verifies the patient's credentials, the patient will be admitted onto the sales floor. There, an advisor will assist the individual in determining the products that will best treat their qualifying condition(s).

A primary feature of our dispensaries is a large, open sales floor, as we have found that this design accommodates nearly all patients. Patients who prefer only a brief employee-patient interaction can easily locate their product(s) of choice and proceed directly to a teller station for purchase, whereas those who desire extended consultation are provided the space necessary for comfortable product perusal alongside knowledgeable staff members.

### **Teller Stations (Blue Arrow)**

After consultation, the patient will approach a teller station, where s/he will relay the products s/he would like to purchase. The teller will gather the requested products, accept payment, and dispense medicine to the patient.

### **Exit (Gray Arrows)**

After the patient has procured his/her medication, he/she will exit the sales floor into the lobby and then exit the dispensary premises.

### **Quality Materials**

As we do at our existing dispensaries, we will use quality materials in interior and exterior finishes. Our dispensary design creates a warm and welcoming environment with modern accents that enhance the retail experience. **The images below show one of our existing dispensaries in Scottsdale Arizona, illustrating the overall design we will adopt for the proposed dispensary.**



Harvest of Scottsdale



Harvest of Scottsdale





Harvest of Scottsdale



Harvest of Scottsdale

## Custom Displays

Custom built wood and glass display cases will be designed and constructed to hold a variety of products and facilitate patient-employee discussions. The cases shown below were designed to display flower, vapor cartridges, and a variety of CBD products at one of our existing dispensaries, and integrated menu projections provide information on the available products. Similar display cases will be used at the proposed dispensary.



Harvest of Scottsdale





Harvest of Scottsdale



Harvest of Scottsdale

Free-standing cases installed on the sales floor will be used for products that are best displayed in a flat position, as shown in the image below.



Harvest of Scottsdale

### **Lighting**

A variety of lighting solutions will be used throughout the dispensary to highlight different products and establish a welcoming atmosphere. For example, underlighting will be used on display cases to highlight products.





Harvest of Scottsdale



Harvest of Scottsdale

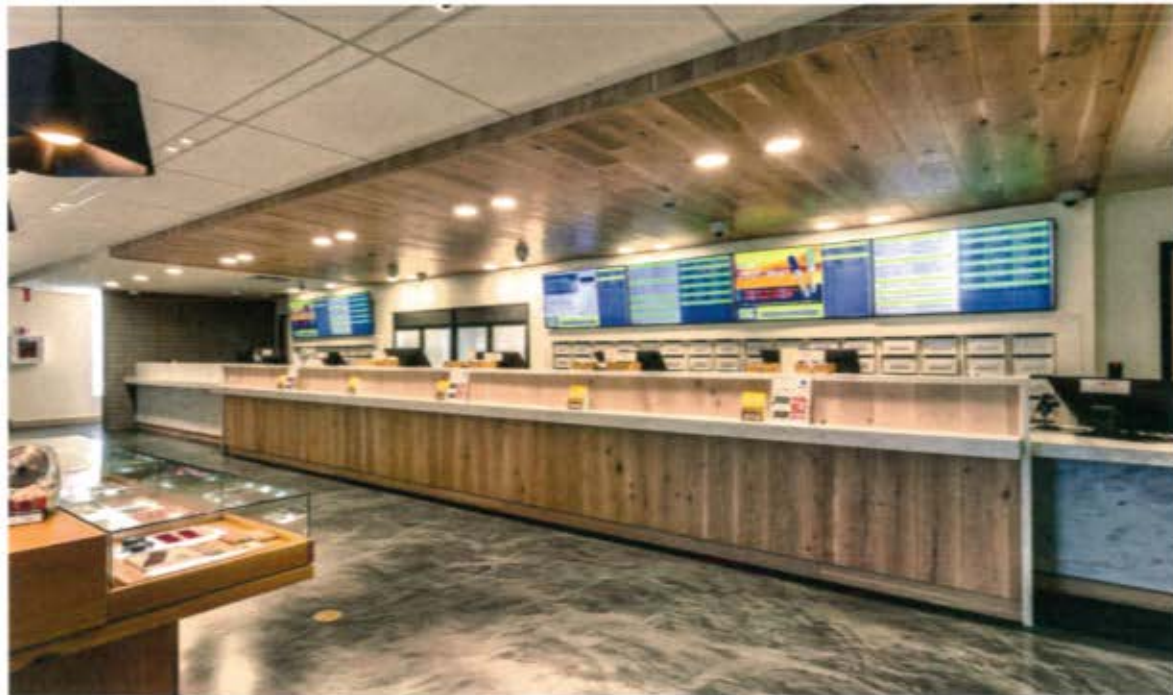
Track lighting, can lights, and focused light fixtures will be used to further highlight specific products and emphasize particular areas of the dispensary (e.g., the teller stations).



## Harvest of Scottsdale

### Surfaces

Wood and granite will be used throughout the dispensary to enhance patient's retail experience. Television displays will be used to communicate information about products, educational seminars, and upcoming support group meetings.



## Harvest of Scottsdale



## NEIGHBORHOOD COMPATABILITY PLAN

### HOW WE WILL FIT INTO THE STABILITY AND QUALITY OF THE SURROUNDING NEIGHBORHOOD

We are committed to the peace of mind of our staff, patients, and community members. Although many individuals may be hesitant to welcome a medical cannabis dispensary into their community, we believe our track record of operating dispensary facilities in other states speaks for itself. We presently hold 32 medical cannabis licenses in seven states, including 17 operating dispensaries totaling over 23 years of cumulative dispensary operation. We have served nearly 100,000 patients and have conducted millions of transactions without experiencing a single complaint from a business or community neighbor and without experiencing a security incident. In fact, rather than only minimizing potential negative impact, we have taken it upon ourselves to make a positive impact and improve the lives of those in the surrounding community. We are confident that we will have the same success at our proposed dispensary location in Santa Rosa.

Harvest wants to ensure we represent the community in a positive manner by having a facility that compliments the surrounding area by keeping tones neutral and having well-manicured landscaping that is regularly maintained. The Facility will be clean and inviting with our regular inspections for graffiti, locked trash, and two block radius patrols by Security to ensure both the Facility and surrounding areas are maintained. Our location has a bike rack to accommodate 5 bikes and is less than 500ft from a bus stop making it easily accessible to patients in the community who use alternative transportation to a car.

### Building and Site Improvements

If awarded a permit to dispense cannabis in Santa Rosa, we will complete building and site improvements, beautifying the area around the dispensary. These improvements will include:

- Cleaning and repairing the parking surface.
- Ensuring ADA compliance with striping, signage, and access.
- Removing, trimming, and/or replacing plants to improve visibility and discourage loitering.
- Maintain landscaping that compliments the surrounding suites and neighborhood.
- Improve lighting to facilitate security monitoring and improve visibility and safety inside and outside of the facility in addition to the parking lot.
- Add signage to discourage loitering and prohibit any consumption.
- 24/7 security on-site that execute daily inspections for graffiti and disrepair in addition to trash and rubbish inspections.



In our experience, community members and nearby business owners are most often concerned with a potential increase in criminal activity due to the presence of a medical cannabis dispensary. However, there is no evidence that substantiates this concern, either in the scientific literature or in our own experience operating dispensaries in other states. For example, Americans for Safe Access, in their 2011 Dispensary Report, cited dozens of officials who have stated, unequivocally, that crime decreases in the immediate vicinity of new dispensaries, as additional foot traffic, lighting, and security measures discourage criminal activity. In addition, federally funded research conducted by scientists at the University of California, Los Angeles showed that there is no relation between the density of medical cannabis dispensaries and violent or property crime rates. Other research conducted by the same group showed that there are also steps that can be taken to further reduce the potential negative impact on the surrounding area:

- ❑ Employing a dispensary agent as a visible presence outside of the dispensary entrance was related to significantly lower crime rates within 250 feet of the dispensary. Although not statistically significant, dispensaries employing such an individual also had lower crime rates up to 1000 feet from the dispensary
- ❑ Installing visible security cameras was related to significantly lower crime rates within 250 feet of the dispensary
- ❑ Posting signs that proper identification and authorization were required to purchase medical cannabis was related to significantly lower crime rates within 250 feet of the dispensary, and although not statistically significant, were related to lower crime rates within 1000 feet of the dispensary.

We presently implement all of these strategies in our existing dispensaries and will employ these strategies in our proposed Santa Rosa dispensary location to reduce any potential negative impact on the surrounding community and businesses.

We will also implement other measures that will reduce the likelihood of criminal activities in the vicinity immediate to and surrounding the dispensary:

- During business hours, a state licensed security guard will be charged with monitoring the parking lot and area surrounding the dispensary, securing safe ingress and egress to patients' transportation and strictly enforcing loitering policies while adding to the safety of the patients and the neighboring community by maintaining a visible presence
- ❑ After business hours, we will contract with a security company to provide a state licensed security guard to patrol the exterior of the premises

- ❑ A licensed and bonded landscaping company will clean and maintain trees, bushes, and other foliage around the perimeter of the dispensary to improve visibility and limit the areas in which criminal activity may take place
- ❑ Security lighting will be installed to ensure all areas around the dispensary are well lit, including sidewalks, parking areas, waste disposal locations, and the front facade.
- ❑ As we have at our existing dispensary locations, we will establish a positive working relationship with local law enforcement officials, seek their counsel on other strategies for reducing potential criminal activity, and encourage them to increase their presence in the community around the dispensary to further deter potential criminal activities

We have employed all of these strategies in our other dispensary operations, and we will continue to do so in our proposed Santa Rosa operation. Through thorough research and sound execution, we will continue to improve our security efforts and reduce the likelihood of criminal activity near our dispensary operation.

## Environmental Impact

As a responsible member of the community, we are dedicated to proper stewardship of its resources and good environmental citizenship. We strive to have a minimal impact on the local and global environment. We employ an environmentally conscious business model, and we intend to utilize these practices in our business operations to the extent that is practical.

An integral part of this will be sourcing our medical cannabis from cultivation facilities that have demonstrated water-smart and zero-waste practices. Our cultivation facility in Arizona is a zero-waste facility that reuses all water and byproducts in the cultivation process.

Knowledge gained from the operation of that cultivation facility will provide an understanding of water and resource conservation, which we will use to determine from which facilities to source medical cannabis and medical cannabis finished products.

There are measures we can take within our own walls as well. As an environmentally responsible business, we will implement practices that minimize waste; make use of energy-efficient heating and cooling equipment; use Energy Star rated computers, peripherals, and other equipment; leverage the use of energy-efficient lighting; and install water-saving plumbing fixtures and low-flow toilets. We will use recycled packing materials and other products as often as is practicable and implement an in-house recycling program for all waste generated by patients, staff, and certain aspects of the packaging process. Harvest will also conduct an annual energy audit to reveal additional cost-saving measures that we can undertake to reduce the dispensary's power and water use and other ways to operate more efficiently.

Finally, we will take measures to eliminate any cannabis odor that may potentially emanate from the dispensary. Ventilated air from the dispensary will pass through HEPA filters with UV-light sanitation. Any air that is expelled from the building will be filtered again through HEPA and charcoal filters to ensure clean, odor-free air.

## Community Outreach and Economic Impact

In addition to reducing any negative impact, it is our goal to have a positive impact on the surrounding community and businesses. We believe that the proposed dispensary will be a benefit within the community in the following ways:

- At least 23 new jobs will be created for local residents, paying between \$40,000 and over \$100,000 annually
- These jobs will require substantial initial and ongoing training, including not only industry specific training, but also training with broader applicability such as first aid, accounting, auditing, regulatory compliance, plant-based medicines, and customer service, which can be applied to other jobs within the community
- In addition to direct staffing, we will contract with several vendors, service providers, and other professionals, such as security companies and medical professionals, who will benefit from our company's operation
- In Arizona, we have conducted our dispensary operations in concert with local neighbors and neighboring businesses. We hold multiple annual events and encourage neighboring business owners to participate. Adjacent tenants have experienced increased business and are very satisfied with being located near the dispensary. Operating the Santa Rosa dispensary with the same level of professionalism, we expect to see the same results, drawing new business to the area, creating more new jobs, and generating more tax revenue.
- To date, we have donated over \$400,000 to local charitable organizations (Justa Center, Epilepsy Foundation, Climb to Conquer Cancer), veterans, seniors, and patients in need. We will continue our charitable activities in Santa Rosa
- We employ an Outreach Coordinator to organize support groups for individuals suffering from various conditions (pediatric epilepsy, chronic pain, multiple sclerosis), provide meetings space and arrange access to medical professionals for those support groups, and have established relationships with local community organizations, such as the Epilepsy Foundation, to collaborate on philanthropic and charitable efforts. Our goal is to implement a similar culture of giving and outreach in Santa Rosa
- Headed by our Medical Director, our dispensaries host free monthly educational lectures and new patient orientation seminars. The educational seminars cover topics such as seizure disorders, strain selection, medical research, conservative dosing strategies, medical cannabis use among elderly patients, and other relevant topics. We have received incredible support and positive feedback from the community, patients, employees, professional health care providers, and governmental entities regarding these seminars
- We host the following support group meetings at our existing dispensaries for patients suffering from epilepsy, chronic pain, cancer, and PTSD to provide a forum for

discussing treatment options, sharing successes and setbacks, and offering emotional support. We will do that same at the proposed Santa Rosa dispensary

- In Arizona, we established a 501(c)(3) non-profit organization that dedicates considerable time and funding to providing support for families with children suffering from pediatric seizure disorders, including financial assistance, access to physicians, voluntary guidance and care, and medicine for patients who cannot afford treatment. To date, we have positively affected the lives of over 100 children and their families. We intend to establish a local chapter to do similar work in the Santa Rosa community.

### Heating, Ventilation, Cooling, and Air Filtration

Harvest's facility includes a fully climate-controlled environment. Heating, ventilation, cooling, and air filtration will be installed by a licensed professional and receive routine maintenance, as needed, to ensure proper functioning of all environmental controls installed throughout the Facility. The Facility will utilize equipment that adequately controls air temperature and humidity where cannabis and cannabis products will be stored. The Facility will be designed and installed for efficient utilization of energy in accordance with the International Energy Conservation Code (IECC). Harvest will also use smartmeters for realtime metrics on energy consumption.

### Ventilation System

### Odor Control Information

Harvest has developed the following plan for the odor control system to be utilized as described below. Odor from cannabis operations, if not treated properly, is a facility security risk and a public nuisance to surrounding neighborhoods, businesses, and pedestrians. Harvest is committed to being a good steward of the environment and will institute a rigorous odor control plan for its Retail Facility. The odor mitigation strategies described here are consistent with industry best practice and compliant with all applicable state and local laws and regulations, including regulations promulgated by the City and the BCC.

The best control technology for marijuana facilities is carbon filtration. The Retail Facility will be equipped with an inline charcoal exhaust system with an activated carbon filter, which removes

99% of all pathogens and odors and ensures that any odor generated inside the Facility is not detected outside of the building, on adjacent properties or the public right of way, or within any other unit located within the same building if the used occupies only a portion of the building.

The system and all components will be reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as meeting professional expectations of competency and as sufficient to effectively mitigate odors for all odor sources.

Harvest will ensure systems, processes and maintenance all fall within best industry practices. Filters will be replaced regularly to ensure the continued effectiveness of the odor mitigation system. A Manager will be responsible for replacing all carbon filters in accordance with the manufacturer's specifications and maintaining records of maintenance and replacement. All Managers must comply with company Standard Operating Procedures which requires a monthly check of each filter to ensure that all filters are working properly. Further mitigation strategies will be explored in the unlikely event that carbon filtration is found to be inadequate for odor mitigation. The Facility Manager will ensure the regular maintenance of such equipment, including regular cleanings and filter replacements.

#### Ventilation Intake Opening

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The location of air intake openings will comply with IMC. All intake fans will be equipped with UV and insect filters. Air intake openings that terminate outdoors will be protected with corrosion-resistant screens, louvers, or grilles. Openings in louvers, grilles, and screens will be sized in accordance with IMC, and will be protected against local weather conditions. Outdoor air intake openings located in exterior walls will meet the provisions for exterior wall opening protective measures in accordance with IBC.

#### Outdoor Air

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The minimum outdoor airflow rate will be determined in accordance with IMC. Ventilation supply systems will be designed to deliver the required rate of outdoor airflow to the breathing zone within each occupied space.

#### Air Balancing

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The ventilation air distribution system will be equipped with a means to achieve at least the minimum ventilation airflow rate as required by IMC. Ventilation systems will be balanced by an approved method.



## Duct Systems

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Duct systems used for the movement of air in heating, air-conditioning, ventilating, and exhaust systems will conform to the provisions of IMC.

## Dehumidifier Equipment

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If required, the Facility will be equipped with a dehumidifier system. Humidity controls set at or below sixty percent (60%) will be installed and maintained as necessary, according to manufacturer's specifications, to control mold or pathogen growth.

## DESCRIPTION OF HOW COMPANY WILL MAINTAIN THE PREMISES AND ENSURE THAT IT REMAINS FREE FROM TRASH AND GRAFFITI

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Harvest is committed to being a good neighbor. All security measures will be reasonably designed to provide assurance that both patron and employee behavior does not detract from the quality of life for adjoining residents, property owners, and businesses. Harvest will complete a daily inspection to ensure maintenance of the interior and exterior of the facility. Harvest will ensure that the Retail Facility premises and associated parking, including the adjacent area under the control of Harvest and any sidewalk or alley, will be maintained in an attractive condition and will be kept free of obstruction, trash, litter, and debris at all times. In the event that vandalism in the form of graffiti occurs, it will be removed or painted over within twenty-four (24) hours. Adequately illuminating the exterior of the building in the evening will deter vandalism of any kind.

Harvest's Facility will be patrolled by a Security Guard at all times, prohibiting individuals from remaining on Harvest's premises if they are not or will not be actively engaging in the purchase of cannabis goods or any other activity expressly related to the operations of Harvest.

Additional details pertaining to Harvest's commitment to fostering neighborhood and community connection, including the appointment of an employee as a designated liaison with the neighborhood, can be found in the Neighborhood/Community/Employee Relations section of this application.



#### DESCRIPTION OF ATTRACTIVE FAÇADE, SETBACKS, ETC.

Landscape foliage will be at least six feet from the building to enable proper security, pest control, and facility maintenance.

Signage will conform to the rules set forth by the Bureau, the City and all applicable state and local laws, regulations, ordinances, and other requirements. If approved by Bureau and allowed by the City, a phone number and website may also be displayed to provide a resource for obtaining additional information about Harvest. Harvest's hours of operation, as allowed by state and local requirements, will be conspicuously posted at all public entrances to the Facility.

Signage will be limited to one (1) wall sign no larger than twenty (20) square feet in area. Interior signage will not be visible from the exterior. No temporary signs such as window signs or banners will be posted.

#### NEIGHBORHOOD ENHANCEMENT PLAN

#### DESCRIPTION OF SITE IMPROVEMENTS

If awarded a permit to dispense cannabis in Santa Rosa, we will complete building and site improvements, beautifying the area around the dispensary. These improvements will include:

- Cleaning and repairing the parking surface
- Ensuring ADA compliance with striping, signage, and access
- Removing, trimming, and/or replacing plants to improve visibility and discourage loitering
- Improve lighting to facilitate security monitoring and improve visibility and safety
- Add signage to discourage loitering and prohibiting consumption on site

#### INTEGRATION OF PROJECT THROUGH AN ATTRACTIVE FACADE

The façade will be improved to enhance the building and improve the appearance to our portion of the neighborhood. Colors and materials will be consistent with other high-end retail businesses in the area which are primarily neutral tones. The facade will be well-lit to enhance visibility and also improve security. Harvest is committed to creating a façade that is attractive, clean, and welcoming to patients. Within 500ft of the business Harvest will regularly have Security Guards patrolling for trash, debris, and graffiti in addition to a daily two block patrol to ensure the facility always remains clean. Harvest's goal would be to have a similar appearance as previous facilities as seen below which include clean lines, clear entry way, and clean aesthetics.



#### DESCRIPTION OF ENVIRONMENTALLY FRIENDLY BUSINESS PRACTICES

The content within this section details Harvest's "green" business practices relating to energy and climate, water conservation, and materials/waste storage. We care deeply about the environment and the judicious use of scarce resources. Sustainability is engrained in our company ethos from installing solar panels, to zero waste policies, to progressive packaging strategies. To implement the plan, we will audit our facility and processes for energy efficiency, implement new sustainable technology, and measure our results.

## CEQA COMPLIANCE

Harvest understands its responsibility to prepare any environmental documents required by state and local jurisdiction for compliance with CEQA. Harvest will conduct and pay for any required CEQA reviews, and pay for all costs of ensuring environmental compliance, including those of the City.

## SMART METERS

Harvest will install smart meters throughout the Retail Facility to record standard metrics including temperature, humidity, airflow, and other complex efficiency measurements. With real-time information and insight into the overall use of resources, providing valuable data to be used to provide a safe and healthy environment for our employees and cannabis product.

## EFFICIENT DELIVERY

Harvest will utilize Toyota Prius Hybrids as delivery vehicles for all delivery of cannabis products.

The Prius has an aerodynamic exterior, offers an EPA-estimated fifty-eight (58) miles per gallon, and reduces emissions of carbon dioxide, allowing Harvest to be mindful of the impact delivery has on their carbon footprint.

## ELECTRICAL SYSTEM AND LIGHTING

Harvest's electrical and plumbing systems will be installed by a licensed professional and in accordance with an approved electrical permit and all applicable State and local regulations. Harvest's electrical system will have sufficient capacity to handle the actual electrical load using energy efficient light bulbs and automatic censored lights where possible. All electrical work and upgrades at the Facility will be performed with proper permitting and be connected to the electrical system in accordance with the equipment manufacturer's recommendations. If approved, Harvest will utilize solar panels to conserve energy and improve efficiency.

Even with energy efficient and automatic censored light bulbs, there will be safe and adequate lighting in all areas where cannabis and cannabis products will be stored or dispensed. Censored lighting will be utilized primarily in handwashing areas, toilet facilities, and dressing and locker rooms, where lighting will not always be required.

All electrical control panel rooms will be marked with proper signage stating, "ELECTRICAL ROOM." All electric circuits, panels, and disconnect switches will be easily accessible and clearly marked.

The Facility Manager will ensure that the electrical system and lighting comply with all applicable state and local laws, regulations, ordinances, and other requirements, will be maintained in good repair, and will not present an electrical shock or fire hazard. The Facility Manager will also

actively work to reduce energy consumption by monitoring energy use.



## SOLAR PANELS

Harvest also plans to purchase and install solar panels on the dispensary facility, which will reduce our carbon footprint by tons in the next 25 years.

## COMMUNITY RECYCLING CENTER

We are not content with simply minimizing our impact on the environment, we want to assist the community in minimizing their impact as well. Therefore, we will incorporate a community recycling center into our dispensary. Patrons can bring cardboard, paper, aluminum and plastic to our facility and we will sort and recycle their waste. This will greatly reduce waste produced by our patients in the community and support our zero-waste initiative.

## Water Management

Harvest water supply system will be installed by a licensed professional, originate from a system of regulated water, and will be sufficient to meet the demands of Harvest's planned operations, including personal consumption. Harvest will derive its water supply from a source that provides a safe, potable, and sufficient supply of water to satisfy all the needs and requirements of the Facility. The Facility Manager ensure that water management operations comply with all applicable regulations set forth by the Bureau, as well as all state and local laws, regulations, ordinances, and other requirements. The Facility Manager will also work to actively reduce the Facility's water usage.

Harvest will comply with all applicable International Plumbing Codes (IPC) regarding the erection, installation, alteration, repair, relocation, replacement, addition to, or use or maintenance of plumbing systems within the Facility.

No liquids of any kind, including water, will be discharged into a public or private sewage or drainage system, watercourse, body of water or into the ground, except in compliance with applicable regulations of the State regional water quality control board.

## WATER SUPPLY AND PLUMBING

Harvest's piping system will be properly installed, receive adequate maintenance, comply with all applicable State and local regulations, and be of sufficient size and design to carry adequate quantities of water to the required places throughout the Facility.

## TOILET FACILITIES

Adequate, readily accessible toilet facilities will be available to both employees and consumers.

The toilet facilities will be maintained in a sanitary condition and use low water pressure to reduce water usage. The Facility Manager will perform or oversee a daily walk-through to ensure toilets, hot running water, toilet paper, disposable towels, and soap are available at the Facility.

Regular maintenance will be scheduled to ensure toilet facilities are maintained in a clean and functioning condition and are as efficient as possible.

#### HANDWASHING FACILITIES

Easily accessible handwashing facilities with warm running water on an automatic sensor will be located in all toilet facilities and employee breakrooms. Instructive handwashing signage will be displayed at all handwashing facilities and may be posted in multiple languages, as needed.

#### WATER BOTTLE FILLING STATION

Harvest will provide water bottle filling stations to be readily available for patrons and employees. Water bottle filling stations will be located in the main lobby area to encourage the reuse of plastic water bottles.

#### WATER QUALITY

Plumbing, bathrooms, and handwashing facilities will be properly maintained and be compliant with all applicable state and local laws, regulations, ordinances, and other requirements. All drain areas will be maintained and routinely inspected so that they do not contribute to the contamination of any inventory or contact surfaces by sewage, filth, or any other extraneous materials, or by providing a breeding place for pests. Harvest will ensure that all water used in the Facility meets, at a minimum, the U.S. Environmental Protection Agency's water quality standards for public water systems.

#### PAPER GOODS

Harvest will utilize recycled paper goods wherever possible, including paper towels, receipt paper, printer paper, and notebook paper. Printers will be automatically set to print two-sided documents. Our goal is to divert 90% or more of solid waste generated at the dispensary from the landfill. To accomplish this, we have implemented a company-wide recycling and composting policy. Employees will be trained on proper waste management and encouraged to find innovative solutions to reuse material when appropriate. To significantly reduce the amount of paper we use at the dispensary all files, records, and information that we are permitted to store on a secure cloud server will be stored digitally. All digital records retention will be approved and stored on network servers that are protected by enterprise-class firewall systems that ensure confidentiality and HIPAA compliance. Eliminating unnecessary paper waste through digital

## DESCRIPTION OF PUBLIC RELATIONS AND NEIGHBORHOOD OUTREACH

### *Civic Engagement*

Harvest has been proactive in its approach to developing relationships in the Santa Rosa community. We have been in communication and forged strategic partnerships with business leaders, local elected officials, and community leaders. However, our community outreach is not stagnant. Harvest will continue to meet with civic organizations, other local businesses, neighborhood leaders, and government officials to listen to their concerns, answer questions, offer solutions, and solicit their input.

### *Collaboration with Local Businesses*

At Harvest, our goal is to be an integral contributor of the local Santa Rosa economy. To facilitate this, Harvest has engaged the majority of nearby businesses, including all of those within 300 ft. to introduce ourselves and request any comments or concerns about our intended operations. Creating dialog with other small businesses and is essential to Harvest being a responsible and trusted neighbor. Harvest will maintain transparency in any remediation efforts required to alleviate or address local concerns. Harvest intends to continue to listen, share knowledge, and create an understanding of our services, objectives and planned outcomes with other local businesses and community partners. Every year in the months of June and December we plan to host a meeting where we will communicate and receive feedback from all entities within 300 feet of the Harvest Dispensary Facility. We will coordinate with nearby local businesses to host the neighborhood business meetings to introduce ourselves and provide the community an opportunity to engage in dialog with our staff. These meetings will be organized and prepared with the help of our on the ground Neighborhood Liaison, Sharon Wright, with open communication lines for members of the surrounding local business community to voice their concerns is essential to Harvest being a responsible and contributing Santa Rosa local business.

### *Harvest Community Benefit Committee*

Harvest is committed to maintaining positive relationships with the surrounding Santa Rosa community. The overall goal will be to build a transparent relationship with the City to ensure that its residents feel comfortable and secure with Harvest's retail operation. One of the primary responsibilities of the Harvest Community Outreach Committee will be to field community questions and concerns. Harvest intends to maintain a regularly-updated website where consumers and community members can receive current relevant information about our operations and company values. Harvest will also have a FAQs page to address common questions about the cannabis industry and our Santa Rosa retail operation.

Harvest intends to continue to listen, share knowledge, and create an understanding of our services, objectives and planned outcomes with all interested parties. Harvest will frequently meet with public officials, the community, and stakeholders so that we may hear about any issues or concerns related to the facility, our operations, and our presence in the Santa Rosa community. Harvest will publicly post on our website and in our facility the Harvest Community Outreach Committee's general email address in addition to the Neighborhood Liaison's, Sharon Wright, contact information, as well as an explanation of the Harvest Community Outreach Committee's purpose and procedures for handling complaints. Harvest

encourages all community members, neighbors, businesses, and clientele to reach out immediately to the Neighborhood Liaison should there be an issue with our operations. Sharon may be contacted with comments, concerns, complaints, or questions at any time, including during or after normal business hours. Sharon as Neighborhood Liaison, in conjunction with the Harvest Community Outreach Committee, will record and investigate each inquiry and take measures to address all legitimate issues to the satisfaction of the complainant and any other stakeholders.

Harvest will also host at least two public outreach meetings per year that meet City approval. The Harvest Community Outreach Committee will coordinate public outreach and listening sessions by scheduling semi-annual gatherings to listen to the community and its feedback on the retail facility and operation. If necessary, the Harvest Community Outreach Committee and the Neighborhood Liaison will establish an action plan and a reporting arrangement to ensure the community is informed about facility-related developments. Our goal is to foster an inclusive environment where neighbors feel safe asking questions about our operations and philanthropy. Neighborhood associations, local businesses, residents, area nonprofits, law enforcement and local businesses will be invited to participate. It is important to hear the community's voice and ensure their needs are incorporated into our mission.

### *Education*

Harvest is committed to providing patients and consumers with educational services and programs to enhance their understanding and overall benefits associated with the California commercial cannabis program. As we have done in the states we are currently operating in, we will actively stay informed of new legal developments at both the local and state levels and will provide the most current and accurate information and guidance to consumers. At the dispensary facility and on our website, we will provide educational materials and pamphlets sourced from licensed commercial cannabis testing facilities as well as academic and scientific institutions about the effects of cannabis and information about certain cannabinoids, strains, and manufacturing methods and practices.

Harvest intends to produce and distribute quarterly newsletters to all customers and interested community members, keeping them abreast of Harvest's involvement in the larger California cannabis community including, the opening of new stores, cannabis competitions it has entered, and any new seminars or important updates to cannabis local or state law locally, to name a few topics.

Monthly informational seminars will be held for both qualified and registered patients and adult consumers to cover a variety of topics, including California and Santa Rosa commercial cannabis rules and regulations, methods of consumption, dosage and serving size suggestions, cooking, and general information on safe and responsible use. As the need for various educational classes arise, Harvest will adjust the monthly class schedule to best serve the greater needs of the patient and consumer base.

Many of the seminars will be hosted by Dr. William D. Troutt, Harvest's Director of Medical Education. Dr. Troutt has hosted multiple workshops for patients in Tempe. Dr. Troutt is a Naturopathic Medical Doctor who specializes in cannabis-based medicine and treatment. He was the first Medical Director of a state-licensed dispensary in Arizona, and currently serves as the Medical Director Advisor for all six (6) sister Harvest dispensaries based in Arizona. Dr. Troutt's knowledge of and experience with medical cannabis extends to a wide variety of topics, including its use for controlling seizure disorders. He's presented on the therapeutic effects of cannabis at many venues including an Adult Epilepsy Conference in Phoenix, Arizona Epilepsy Foundation support groups at Banner Hospital and Mayo Clinic, and the Harvesting Hope pediatric epilepsy empowerment group. Dr. Troutt has also



conducted primary research on the therapeutic effects of cannabis, most recently publishing a study in the Journal of Psychoactive Drugs on the characteristics and perceptions of medical cannabis patients in Arizona.

At Harvest of Santa Rosa, we plan to host seminars similar to those listed below that we have hosted at the Harvest of Tempe and Harvest of Scottsdale dispensary facilities:

- ☐ Chronic Pain Support Group at Harvest of Tempe- Harvesting Support for Chronic Pain: A resource and empowerment group for persons suffering from chronic pain.
- ☐ New Patient Orientation with Dr. Troutt at Harvest of Scottsdale- Join Dr. William Troutt in a discussion of medical cannabis. Topics will include: dosage; risks and benefits; realistic expectations and modalities of use. and
- ☐ Harvesting Hope for Pediatric Epilepsy at Harvest of Tempe- A support and information group for families of children with seizure disorders.

Some educational sessions will be open to the public and will include talks by local and national experts regarding general health and wellness, diet, exercise, stress management, and other important holistic and self-care health-related topics. These sessions will be held off of the dispensary facility premises. Sessions specifically focused on cannabis consumption, such as how concentrates differ from flower, and how to properly administer medical cannabis will be limited to verified adult customers and patients and held on the retail premises for a more intimate educational setting. Absolutely no cannabis will be consumed at Harvest's Santa Rosa retail facility by employees or clientele, either during these sessions or at any other time.

#### LOCAL NEIGHBORHOOD LIASON

Harvest has appointed Mrs. Sharon Wright—a native and current resident of Santa Rosa—as its Neighborhood Liaison for the business. Mrs. Wright is also a consultant of Harvest and is interested in the success of Harvest's retail operation in her home community. Mrs. Wright has been integrated into the Santa Rosa community since 1981 including three four-year terms on the council

#### COMMUNITY BENEFITS

Harvest has a long history of seeding and maintaining community support in conjunction with operating local commercial cannabis retail facilities. Since 2013, Harvest has donated over \$400,000 to veterans, seniors, patients in need, and local charitable organizations including Justa Center, Arizona Epilepsy Foundation, Climb to Conquer Cancer, Ryan House, Bosom Buddies, and American Cancer Society.

Below are examples demonstrating Harvest's collaborations with local organizations in other communities in which we operate.

- Epilepsy Foundation of Arizona - Since 2014, Harvest worked with, attended, and sponsored the annual EFAZ Fundraising Gala. Additionally, Harvest sponsored the annual EFAZ 5K run and hosted an educational table at the event.
- Quality Connections - Quality Connections is a non-profit organization that provides employment opportunities for people with special needs. Harvest collaborated with Quality Connections to employ approximately 40 persons with disabling conditions at numerous Harvest locations.
- Help Me PTSD - Since 2015, Harvest has worked with and sponsored workshops.
- Harvesting Hope - Harvest CEO, Steve White, has been inspired by families raising children with seizure disorders. Steve has gathered a team to create Harvesting Hope,

a 501(c)(3) non-profit organization, dedicated to improving quality of life for young children and families suffering from seizure disorders.

Harvest intends to engage in equally productive and beneficial philanthropic partnerships in Santa Rosa if permitted to operate a cannabis retail facility.

#### *Defined Contributions*

To continue in our charitable endeavors in Santa Rosa, the Harvest Community Benefit Committee will develop a contribution program to specifically handle charitable contributions Harvest will provide to the local Santa Rosa community.

Harvest is committed to setting aside at least three percent (3%) of yearly net profits for monetary contributions to local charitable and community organizations. Harvest believes that well-funded health and social services programs are the bedrock of a thriving community. We have sought out and established the following partnerships:

#### **Redwood Empire Food Bank – At least \$1500 per year**

- ☐ The REFB is the largest hunger-relief organization serving north coastal California. They provide services to 82,000 people contributing \$40 million dollars in retail value worth of food to people who, without it, often succumb to a wide-range of long-term social, physical and emotional negative effects. We have discussed how we can best assist in their mission and committed to giving at least \$1500 per year in addition to volunteering time. See attached commitment letter.

#### **Santa Rosa Fire Fighters – At least \$1500 per year**

- ☐ The mission of the Santa Rosa Firefighters7, Local 1401, is to serve, protect, and improve the community. They partner with citizens in the community to ensure that proper fire, emergency medical, and disaster response capabilities exist. We have discussed how we can best assist in their mission and committed to giving at least \$1500 per year in addition to volunteering time. See attached commitment letter.

#### **Community Foundation Sonoma County – At least \$1500 per year**

- ☐ The CFSC focuses on the power of connecting people, ideas, and resources to benefit all who live in the community. They facilitate connections, stewardship and solutions within Sonoma County and have awarded \$200 million in grants to members of the community. We have discussed how we can best assist in their mission and committed to giving at least \$1500 per year in addition to volunteering time. See attached commitment letter.

#### **Sonoma County Family YMCA – at least \$1500 per year**

- ☐ The Sonoma County Family YMCA seeks to enhance the lives of all people in the community through programs designed to develop spirit, mind, and body. The SCFYMCA is made up of people of all ages and from all walks of life working side by side to strengthen the overall Sonoma County community. We have discussed how we can best assist in their mission and committed to giving at least \$1500 per year in addition to volunteering time. See attached commitment letter.

#### **Boy's & Girl's Club of Santa Rosa – at least \$1500 per year**

- ☐ The Boy's & Girl's Club of Sant Rosa seek to inspire and enable all young people, especially those who need it the most, to reach their full potential as productive, responsible and caring citizens. They provide a safe place to learn and grow along with life-enhancing programs and character development experiences. We have discussed how we can best assist in their mission and committed to giving at least \$1500 per year in addition to volunteering time. See attached commitment letter.

### *Customer Volunteer Discount*

In order to encourage Harvest consumers to give back to their local Santa Rosa community, Harvest will implement our Consumer Volunteer Discount initiative, which will offer a range of discounts on final purchases of cannabis goods to patients and consumers who regularly volunteer at local charitable organizations, particularly the organizations Harvest identified above. Harvest will create a simple form customers and patients may pick up from the retail facility that will track their volunteer time and include a place for the charitable organization's supervisor to confirm any completed volunteer hours. For purposes of the discount, Harvest consumers are not required to complete all of their volunteer hours at one charitable organization. In fact, Harvest encourages consumers to divide the hours over numerous identified organizations. For every five (5) volunteer hours Harvest customers complete and record, the customer will receive a ten percent (10%) discount on their next two (2) purchases. If a Harvest customer completes ten (10) or more volunteer hours in a month, the Harvest customer will receive a twenty percent (20%) discount on all purchases made for the rest of the month in which the hours were completed. Harvest will never give away cannabis or cannabis goods for free.

### *Bicycle and Wheelchair Repair*

For customers who use a wheelchair to accomplish their daily tasks, maintenance issues and unfriendly facilities can severely impact their mobility and access to basic resources. For customers who use bicycles as their main mode of transportation, lack of access to tune ups and simple repair parts can have devastating effects on their ability to get around, including access to their jobs and families. As a preventative measure, Harvest plans on hosting free bicycle and wheelchair repair clinics in the spring, summer and fall months. Harvest will set up temporary wheelchair and bike stands where Harvest employees can perform free tune-ups and replace simple bicycle parts such as tires, tubes, chains, and brake cables. Harvest will operate these tune up services by receiving donations and purchasing parts at-cost from participating local suppliers.

Harvest will advertise the dates, times, and locations of these temporary clinics at their retail facility. Harvest will also have a volunteer sign up document for employees and consumers to commit to help at the clinics. If Harvest consumers wish to volunteer their time making repairs at our temporary wheel and bike stands in addition to volunteering time at local charitable organizations, Harvest will count any volunteer hours completed toward Harvest's Consumer Volunteer Discount initiative. After the consumer has completed their desired volunteer hours, a Harvest employee monitoring the tune up stands will record the completed hours and sign the volunteer time tracking spreadsheet.

### *Healing Our Heroes*

Harvest will offer a twenty percent (20%) discount on final purchases to any medical patients or adult use customers with a veteran designation as part of our Santa Rosa facility's initiative to Heal Our Heroes. Harvest has a duty to honor our veterans with care that reflects their service, sacrifice and bravery. As part of this program, Harvest will help customers understand the potential benefits and effects of using cannabis to treat wounds of war like Post Traumatic Stress Disorder (PTSD) and Chronic Traumatic Encephalopathy (CTE).

To promote Healing Our Heroes and support California veterans, Harvest will advertise this initiative with local chapters of the American Legion, Veterans of Foreign Wars (VFW), Disabled American Veterans Charity, California National Guard Association, and other active veteran service organizations. By providing a twenty percent (20%) discount to eligible



veterans, Harvest will continually demonstrate our commitment to our nation's heroes and honor their sacrifices.

#### *Santa Rosa Cares*

In addition to the Healing Our Heroes initiative, Harvest's Santa Rosa facility will implement the Santa Rosa Cares initiative, offering a twenty percent (20%) discount on final purchases to medical patients who are low income. To qualify for the Santa Rosa cares program, patients will be asked to show proof of eligibility in either CalFresh, Medi-Cal, or other comparable qualified assistance program. The State of California recognizes that medical cannabis can provide relief that is, unfortunately, not covered by health insurance as medical cannabis falls outside the traditional healthcare system. This leaves many low-income families scrambling to pay for medicine and pain relief that can alleviate their or a loved one's suffering. Harvest believes no patient or family should be denied access to medicine simply because they cannot afford it.

To promote Santa Rosa Cares' compassionate program, Harvest will advertise this and its Healing our Heroes initiatives in local libraries, family and community centers, senior centers, nonprofits and other organizations that consistently engage vulnerable populations such as senior citizens, low-income families, indigent patients, and veterans.

#### *Community & Youth Drug Prevention*

Harvest wants the citizens of Santa Rosa to know that the unlawful use of cannabis has severe consequences. Although recreational cannabis is legal in the State of California, there are still current penalties for recreational use under the age of twenty-one and medical use without a prescription. To bring awareness of the penalties for unlawful use of cannabis, Harvest would like to partner with the City of Santa Rosa Police Department and the Sonoma County Sheriff's Department to hold community discussions. Harvest would also like to invite local elected officials to participate and let the local police departments to set the agenda. It is important that our community works together to denounce and discourage the unlawful use of cannabis in our community.

During these community discussions, Harvest will solicit feedback from the community. Community feedback is essential to understanding the best way to reach our neighbors. There is a lot of misinformation about the use of cannabis and the consequences of unlawful use. Harvest will promote these community discussions through traditional media and social media. In order to drive attendance to these important events, Harvest will encourage the City of Santa Rosa Police Department and the Sonoma County Sheriff's Department, and local elected officials to promote the community discussions.

We hope to hold these community discussions at a school, so that the youth can have access to this important information. Harvest is happily prepared and working to facilitate and sponsor that event. These events would be incredibly productive because social media makes students especially vulnerable to bad information about cannabis and drug use. We believe that students must be empowered with the right information in order to make the right decisions.

#### **PROVIDING HEALTH BENEFITS AND A LIVING WAGE FOR EMPLOYEES**

A good-paying job is the cornerstone of the American Dream. Harvest is proud to offer all employees more than just a living wage and robust healthcare benefits because we

recognize that a career can lift a family out of poverty. Harvest is committed to offering employees health coverage compliant with Affordable Care Act, including coverage of essential health benefits such as:

- ☐ Primary Care
- ☐ Prescription Drug Coverage
- ☐ Emergency Services
- ☐ Dental and Oral Care
- ☐ Laboratory Tests, Screening, and Services
- ☐ Maternity and Infant Care
- ☐ Pediatric Services
- ☐ Hospitalization
- ☐ Preventive and Wellness Services
- ☐ Behavioral Healthcare
- ☐ Ambulatory Patient Services
- ☐ Physical Therapy
- ☐ Rehabilitative and Habilitative Services and Devices
- ☐ Chronic Disease Management

As job creators, Harvest has a moral obligation to ensure each employee can provide for their family and be confident in a profitable and stable career choice. In short, we view our employees as family and we are committed to ensuring each team member earns enough income to support themselves and their loved ones. Harvest is proud to offer all current and future employees competitive compensation packages, supplemented by periodic performance evaluations and opportunities for investment and promotion. Below, Harvest has created an estimated pay scale for future positions in the company.

Position	Pay Scale
Director of Retail Operations	\$45,000 - \$65,000 per year
Facility Manager	\$45,000 - \$65,000 per year
Safety & Security Compliance Director	\$45,000 - \$65,000 per year
Inventory Manager	\$45,000 - \$65,000 per year
Retail Manager	\$40,000 - \$60,000 per year
Delivery Manager	\$40,000 - \$60,000 per year
Wellness Representative	\$15 - \$20 per hour



<b>Delivery Driver</b>	\$15 - \$20 per hour
<b>Security Guard</b>	\$15 - \$20 per hour

In addition to offering employees a living wage, Harvest strongly believes in the philosophy of equal pay for equal work. We have worked diligently to eliminate pay disparities, guaranteeing men and women of all backgrounds have equal earning power. Harvest will also provide paid sick leave to all employees. To better educate and inform its employees of the laws and regulations related to wage standards and paid sick leave, Harvest will post the proper Wage Standards and Wage and Sick Time Notices in a conspicuous place at its facility in English and any other languages spoken by at least five percent (5%) of its employees.

## HIRING PRACTICES WITH INCENTIVES/PREFERENCES FOR LOCAL RESIDENTS

### Local Hiring

Hiring local Santa Rosa residents is a cornerstone of our staffing plan. It stimulates job growth in a community we are invested in and it best serves our patients and customers. Therefore, we have developed strategic recruiting tools to ensure Santa Rosa residents are employed by our business. These strategic recruiting tools include:

- ☐ Offering hiring preferences for Santa Rosa residents.
- ☐ Incentivizing the Director of Human Resources to recruit from pool of local applicants.
- ☐ Setting defined benchmarks to ensure Harvest is meeting its local hiring goals.
- ☐ Working with local job centers and other community-based development and placement services.
- ☐ Advertising job postings in the Santa Rosa Press Democrat.

### Local Contracting

Harvest will use local Santa Rosa companies in the design, development, and construction of the dispensary, as well as local trade services for all infrastructure needs. We will work closely with community members to identify companies to assist.

Attached to this application you will find letters of support from:

- The Maintenance Crew – Janitorial services for facility. See attached letter.
- Valley Tire & Brake, Chris Edwards – Maintenance of delivery vehicles. See attached letter.
- New Paradigm, Tim – Website services and graphic design. See attached letter.
- Zenergy Works, Eric Van Cleave – Design and creative services. See attached letter.

### Hiring Practices

Harvest is committed to maintaining a sufficient number of employees possessing the skill-sets and experience needed to ensure the success of all aspects of our retail operations. Harvest's personnel acquisition practices are in full compliance with the Bureau of Cannabis Control regulations, the Santa Rosa City Council Ordinance 2017-025, the Medicinal and Adult Use of Cannabis Regulation and Safety Act, and all other applicable state and local laws, regulations, ordinances, and other standards. The Director of Human Resources is

responsible for determining the staffing requirements and the development and execution of a staff acquisition plan approved by the CEO. All contractors must be approved by the Director of Human Resources.

#### *Staff Acquisition Processes*

The Director of Human Resources coordinates with the CEO to acquire all necessary staff. The acquisition process may vary depending on the vacant position and any special circumstances including board approval for a direct non-solicited hire. The acquisition process is managed by the Director of Human Resources and typically involves the following:

- Identification of need.
- Identifying job classification and preparing job description.
- Soliciting candidates for the vacant position using methods that best fit the position including, but not limited to:
  - o Internal posting;
  - o Partner posting (e.g., consultants, non-profit partners, vendors, etc.);
  - o External posting;
  - o Temporary staffing agency; or
  - o Executive search firm.
- Reviewing resumes and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth.
- Performing and recording reference checks on qualified candidates including:
  - o Verification of address and education.
  - o Verification of former and current employment.
  - o Recording information from former supervisors on the candidate's performance, if available.
- Scheduling first interviews.
- Scheduling second interviews (with strong candidates) with the direct supervisor.
- Delivering an offer letter to the first-choice candidate (as determined by the direct supervisor).
- Performing a criminal background check on the selected candidate to determine eligibility and to identify any other possible disqualifying items.
- Conducting new hire orientation and training.
- Documenting completion of the probationary period.

#### *Responsibilities*

Harvest will follow industry standards regarding division of responsibilities in the acquisition processes:

- It is the responsibility of potential new hires to provide documentation of previous education and work experience.

- It is the responsibility of new hires and existing employees to participate in ongoing, in-house training programs.
- Managers are responsible for assigning job responsibilities consistent with their employees' demonstrated qualifications.
- The Director of Human Resources will be responsible for assuring all employees have the required qualifications and pass all required background checks.

#### *Eligibility*

Only individuals who are qualified to properly perform their assigned job responsibilities are eligible for employment with Harvest. All prospective employees must be twenty-one (21) years of age or older. The Director of Human Resources will ensure all employees have the required qualifications and employee background checks prior to hire, which include fingerprinting.

We believe in providing economic and employment opportunities to community members in the immediate vicinity of Harvest's business. As such, Harvest will make a good-faith effort to have no less than ninety percent (90%) of its workforce's weekly hours performed by employees whose primary place of residence is within fifty (50) miles of the proposed dispensary.

Harvest will not hire any person that is ineligible under state or local law or company policy. However, in an effort to assure impacted persons have the opportunity to work for Harvest but do not threaten the security or safety of our operations, Harvest will consider the eligibility of each applicant with a criminal record on a case-by-case basis. The general internal policy is not to hire anyone who has a history of theft or violence for a position in the company.

#### *Reference Check*

Applicants will be required to provide two (2) references that confirm their character and skillset. Other items discovered through the reference check process may be considered when making a hiring decision including, but not limited to:

- Unverifiable resume or application statements.
- Negative reference checks or inability to obtain a positive reference from any former employers.
- Lack of stability in work history or residence, if applicant is unable to provide a reasonable explanation.

#### *Discriminatory Practices*

Harvest does not discriminate in hiring or operating decisions. All managers and supervisors must comply with all EEOC guidelines when managing staff issues. No internal policies or practices may discriminate based on or conflict with laws regarding discrimination on the basis of:

- Race
- Height & Weight
- Credit Rating or Economic Status
- Religious Affiliation or Beliefs
- Citizenship

- Marital Status or Number of Children
- Gender
- Arrest and Conviction
- Disability
- Medical History and Examinations (beyond assuring applicant can complete any physical tasks required of the position in question)

#### *Documentation*

In accordance with industry standards, only individuals who are qualified to properly perform their assigned job responsibilities will be hired to work at Harvest's retail facility. Employee qualifications and confirmation of their eligibility for employment under applicable California and City of Santa Rosa regulations and Harvest policies will be documented. Internal personnel records will include, at minimum, the following:

- Employee full name.
- Social security number or individual tax payer identification number.
- Date employment begins.
- If applicable, date of termination of employment.
- Documents provided during the application and interview process, including resume.
- Record of pre-hire due diligence activities, including outreach to personal references and background check, if applicable.
- Copy of employee identification badge.
- Training records.

In conclusion, Harvest will hire the most qualified local applicants to serve the people of Santa Rosa.



Secretary of State  
Articles of Organization  
Limited Liability Company (LLC)

LLC-1

201810610572

FILED

Secretary of State  
State of California

APR 16 2018

**IMPORTANT** — Read instructions before completing this form.

Filing Fee — \$70.00

Copy Fees — First page \$1.00; each attachment page \$0.50;  
Certification Fee — \$5.00

Note: LLCs may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to <https://www.ftb.ca.gov>.

This Space For Office Use Only

**1. Limited Liability Company Name** (See Instructions — Must contain an LLC ending such as LLC or L.L.C. "LLC" will be added, if not included.)

Harvest of Santa Rosa, LLC

**2. Business Addresses**

a. Initial Street Address of Designated Office in California - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
1031 Calle Recodo, Ste. B	San Clemente	CA	92673
b. Initial Mailing Address of LLC, if different than item 2a	City (no abbreviations)	State	Zip Code
627 S. 48th St. Suite 100	Tempe	AZ	85281

**3. Service of Process** (Must provide either Individual OR Corporation.)

**INDIVIDUAL** — Complete Items 3a and 3b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

**CORPORATION** — Complete Item 3c. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 3a or 3b  
Registered Agent Solutions, Inc.

**4. Management** (Select only one box)

The LLC will be managed by:



One Manager



More than One Manager



All LLC Member(s)

**5. Purpose Statement** (Do not alter Purpose Statement)

The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited Liability Company Act.

**6. The Information contained herein, including in any attachments, is true and correct.**

Organizer sign here

Allison McBride

Print your name here





I hereby certify that the foregoing  
transcript of 7 page(s)  
is a full, true and correct copy of the  
original record in the custody of the  
California Secretary of State's office.

APR 17 2018

*ts*

Date: \_\_\_\_\_

*Alex Padilla*

ALEX PADILLA, Secretary of State



The Maintenance Crew

---

## Commercial Maintenance Proposal

Presented by TMC The Maintenance Crew  
Insurance Bonded Company.

*Our Promise to you is to provide a clean; Safe & Healthy Work Environment, to create a policy that is built around the unique needs of your business, and maximize the value you receive for the dollars you spend on your maintenance services.*

---

This document is a proposal for monthly janitorial maintenance services

For: Harvest of Santa Rosa

Proposal prepared by: The Maintenance Crew

Total Monthly Rate is: TBD

This quote expires 90 days from issue date.

\_\_\_\_\_  
Issue Date

\_\_\_\_\_  
Start Date

\_\_\_\_\_  
Authorized Representative Signature & Date



The Maintenance Crew

**EXHIBIT A**

**SCOPE OF WORK AND PRICE**

Page 1

Service will be performed as follows:

**Services we provide**

General Janitorial Services

Dust mop/sweep all hard surface floors

Scrub/Mop all hard surface floors

Burnish all hard surface floors

Scrub & Re- Coat all hard surfaces floor

Strip & Wax all hard surfaces floor

Carpet Shampoo/Bonnet, Etc

**Why Harvest**

We are a family operated business growing in the Sonoma area since 2008 we have service Autozones, Safeway, Equity Properties Under subcontractor, etc. and we are looking forward to serve Harvest of Santa Rosa to provide our quality service.

We are currently Providing service to Grocery Outlet Novato, Petaluma, Rohnert Park & Santa Rosa if you need any reference from our work please feel free to contact them.

**emails**

[petaluma@groceryoutlet.com](mailto:petaluma@groceryoutlet.com)

[santarosa@groceryoutlet.com](mailto:santarosa@groceryoutlet.com)

[novato@groceryoutlet.com](mailto:novato@groceryoutlet.com)

[rohnertpark@groceryoutlet.com](mailto:rohnertpark@groceryoutlet.com)

We look forward to working with you and providing you with our stellar service

# VALLEY TIRE & BRAKE

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TIRES • BRAKES • ALIGNMENT • STEERING • SUSPENSION • STRUTS • SHOCKS • PROBLEM SOLVING

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**BFGoodrich** **DUNLOP**

SMOG CHECK • TUNE-UPS • ENGINE MAINTENANCE



Date: April 18, 2018

To: Mr. Steve White  
CEO  
Harvest of Santa Rosa LLC

From: Chris Edwards  
Service Advisor  
Valley Tire & Brake  
chris@valleytire.com  
707-544-3420

Re: Delivery vehicle service proposal

Mr. White,

Thank you for keeping your business local. We strive to be the best at what we do. Here at Valley Tire & Brake we cover vehicle maintenance from tip to tail. From your very basic oil change all the way up to timing belt replacements. We do all manner of brakes, suspension, front end work, alignments, tires, as well as engine repair, smogs, and general maintenance. We have been in business since 1968. We are veterans of the auto industry with decades of experience.

We have a fleet of 25 free loaner cars that your employees are welcome to use while we work on the delivery vehicles. We work by appointment, that way we can be efficient with your vehicle and time. We use the highest quality parts available, as well as strive for the best customer service in the industry.

We offer courtesy 19 point inspections that cover all the major components of the vehicle. We could set it up to do them on a regular basis for your fleet, that way we can be proactive in your vehicle management. We would enjoy the opportunity to care for your fleet vehicles. There is nothing more important to us than customer satisfaction. Please feel free to reach out to me if you have any questions or would like to set up a fleet account.

Best Regards,

Chris Edwards

**STATE OF MISSISSIPPI**  
**DEPARTMENT OF REVENUE**  
**SALES TAX RECEIPT**  
10-1-77

<b>BUYER'S NAME</b> BUTCHY LAMAR & CO., INC.	<b>ADDRESS</b> 1000 N. 10th St. Tulsa, Okla. 74103	<b>PHONE</b> (918) 436-1111
<b>SALES TAX NO.</b> 1000	<b>SALES TAX NO.</b> 1000	<b>SALES TAX NO.</b> 1000
<b>SALES TAX NO.</b> 1000	<b>SALES TAX NO.</b> 1000	<b>SALES TAX NO.</b> 1000
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**SALES TAX RECEIPT**  
10-1-77

**MISSISSIPPI**  
**SALES TAX RECEIPT**  
10-1-77

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