

Conditional Use Permit Application

Jennifer Woodbury Parcel 043-240-024-000

Existing Building/Reoccupancy:

of Buildings in Redwood Condo at Commercial Court is 3 total buildings in the complex. NorStars Dispensary proposed location is at unit #25 which is one of 6 units in building #1. Unit #25 has an undivided 5.5697% interest in and to Lot 1. The total square foot of unit 25 is 1397.04. The Square foot to be occupied by the dispensary is 1397.04, and is .03 acres of the complex. The occupancy will be determined by Santa Rosa Fire Department and Fire Marshal upon being issued the Conditional Use Permit.

Existing Tenants at 112 Commercial Court:

- Unit #2- Seitz Motors
- Unit #3- Seitz Motors
- Unit #4- Minuteman Press
- Unit #5- Minuteman Press
- Unit #6- Country Linen
- Unit #7- Country Linen
- Unit #8- Vacant
- Unit #9- Vacant
- Unit #10- Bavarian Tuning
- Unit # 11- Bavarian Tuning
- Unit #12-19- Maaco

City of Santa Rosa

APR 17 2018

Planning & Economic
Development Department

Retail Cannabis Use Permit Application Material

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Do not Fit in binder - See Attached plans

Letter of Intent

This letter is to confirm that Jennifer Woodbury, Trustee of the Joan Quinn Trust, owner of 112 Commercial Court #25 intends to lease the above address to J.J.D. NorStar Group L.L.C, NorStar Dispensary, for a term of 3 years. The owner approves the use of the property for a Cannabis Dispensary.

Jennifer Woodbury-Trustee
Signature

4-12-18
Date

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NorStar Pharmaceuticals Project Description Narrative

Commercial Cannabis Use- Operator Proposes Medical Cannabis Sales and Adult Use Cannabis sales. NorStar proposes to sell Medical and Adult Use flowers, edibles, concentrates, topicals and vapor products as well as implements (vaporizers and vapor accessories) that may be used to administer Cannabis or Cannabis Products in strict compliance with the City's zoning code and all applicable state regulations.

Operator proposes to offer wellness services like patient support groups for various medical conditions and scheduled health walks through a local park or hiking trail.

Operator proposes to offer some social services and proposes to operate a weekly food bag giveaway for low-income persons by collecting donations from customers, the local community and by donating some of our proceeds to the program.

Compliance- Operator will diligently pursue and obtain a state medical cannabis license, as well as an Adult Use license, and shall comply at all times with all applicable state and local licensing requirements and conditions, including, but not limited to, operational standards such as, by way of illustration but not limited to, background checks, prior felony convictions, restrictions on multiple licenses and license types, and locational criteria. Operator has submitted a Staffing Plan that requires background checks and illustrates age limitations. See the NorStar Management and Operations Manual for further details.

Separation of License Types- NorStar is seeking to only perform retail cannabis sales with an 'M' license and an 'A' license and will not be requesting any other license type at this location. Operator will have two separate inventories for both 'Medical' and 'Adult Use' sales. Clear separation of license types will be maintained always. Operator will only sell 'Medical Cannabis' to medical patients upon verification of patient status and will only sell 'Adult Use' cannabis to adults 21 and over upon verification of age in strict compliance with state and local laws. See the NorStar Management and Operations Manual for further details.

Building and Fire Codes- This proposed project complies with, and will continue to comply at all stages, with all building and fire codes including adequately marked and illuminated exit signs, posted fire exit plans, certified fire extinguishers and unobstructed entry ways and exits. Operator declares that they will comply with Chapter 18 of the City Code and shall seek and obtain all required building permits and all annual fire permits with inspection(s) prior to operation. Operator shall comply with all applicable H&SC and California Fire Code requirements related to the storage, use and handling of hazardous materials and the generation of hazardous waste. Operator shall also obtain all required Certified Unified Program Agency (CUPA) permits including completing a California Environmental Reporting System (CERS) submission for hazardous materials inventory that meet or exceed State

thresholds and any waste generation for accountability. Operator will install a Fire Department Lock Box for keys to all doors and gates.

Security Plan- Operator shall provide adequate security on the premises, including lighting and alarms, to insure the public safety and the safety of persons within the facility and to protect the premises from theft. Operator has submitted a Security Plan that includes, but is not limited to, the following minimum-security plan requirements:

- Provisions for and locations of security cameras
- Verification that a professionally monitored alarm system will be installed
- Demonstration of safe and secure product storage including outdoor waste receptacles
- Demonstration of safe and secure Transportation and Delivery
- Verification that commercial grade door and window locks will be installed
- Demonstration of emergency access in compliance with state and local regulations by installation of a Lock Box for keys to all doors and gates

See operators Management and operations Plan, Section six: Security Plan for further details.

NOTE: Building Association has its own security camera surveillance system separate from applicant's security and camera system offering additional cameras covering all business and offering video redundancy. Association also has their own Security Guards that monitor and lock and unlock the facility gate daily.

Odor Mitigation Plan- Operator has submitted and Odor Mitigation Plan certified by a licensed professional engineer demonstrating compliance with state and local regulations that will eliminate and prevent offensive odors from escaping the facility.

Outdoor Lighting- Operator has submitted an Outdoor Lighting Plan as part of our Security Plan which includes, but is not limited to, the following points:

- Ensuring that the light source (e.g., bulb, etc.) is not visible from off the site; and
- Confining glare and reflections within the boundaries of the site to the maximum extent feasible

Operator has ensured that Each light fixture is directed downward and away from adjoining properties and public rights-of-way, so that no on-site light fixture directly illuminates an area off the site and that:

- No lighting on private property shall produce an illumination level greater than one-foot candle on any property within a residential zoning district except on the site of the light source
- No permanently installed lighting shall blink, flash, or be of unusually high intensity or brightness

Outdoor illuminated sign above entry way is the same sign used by the last tenant used and consists of 2, five-foot fluorescent lamps. Other outdoor lighting is considered common areas of the complex by the building association and operator has no plans to alter current configuration.

Indoor lighting consists of six solar light tubes, four of which contain supplemental lighting. These four solar tubes contain 3 four-foot T8 fluorescent lamps totaling twelve, four-foot T8 lamps. The solar tubes will be sufficient for daytime use. Operator proposes using energy efficient mini L.E.D pendant lights as supplement on the sales floor.

Noise- Operator has submitted a Noise Control Plan as part of our General Operations Plan. Operator has no plan to use sound amplification equipment at any time for any reason. Operators Noise Control Plan is in strict compliance with Santa Rosa City Code 17-16.170.

Accessory Uses-Limited Access Areas will be well marked and sectioned off from public access. Non-cannabis accessory uses will be administrative office space, reception area, restroom facilities, non-cannabis storage and warehouse space and employee break area.

Vicinity and Neighborhood Context Maps- See attached Maps

Site Plan, Elevations and Floor Plans- See attached plans

Parking Analysis- The complex has 65 painted parking spaces and 4 handicapped parking spaces painted and signed. Operator has been assigned 4 designated parking spaces by building association. Handicapped parking spaces are common property.

See the attached parking diagram for details.

Hours of Operation- Proposed hours of operation are 7 days a week from 9am to 8pm Monday through Saturday. Sunday 11 am to 6 pm. Closed Thanksgiving and Christmas.

Location Requirement- Operator is compliant with city requirements and is not located near another retail cannabis dispensary within 600 feet avoiding overconcentration.

Operator in in compliance with set back from schools with the closest school being Mount Taylor Elementary school located more than one (1) away.

Visibility of entrance. The storefront entrance of this proposed Cannabis Retail facility is in a visible location that provides an unobstructed view from the public right of way.

Operational Plan- Operator has submitted an General Operations Plan that includes, but is not limited to:

Operator shall create an employee register to maintain a current register of the names of all employees employed by the Cannabis Retailer and shall disclose such register for inspection by any City officer or official for purposes of determining compliance with these requirements.

Operator shall maintain customer, patient and sales records in accordance with state law.

Protocols and requirements for patients and persons entering the site. No person shall be permitted to enter operator's facility without government issued photo identification. Adult Use customers must provide proof of age in compliance with current state and local law.

Operator shall not provide Medical Cannabis or Medical Cannabis Products to any person, whether by purchase, trade, gift or otherwise, who does not possess a valid government-issued photo identification card and a valid physician's recommendation under Section 11362.712 of the Health and Safety Code.

Limited Access Areas- Secured access. Operators Cannabis Retail facility shall be designed to prevent unauthorized entrance into areas containing Medical Cannabis or Medical Cannabis Products as well as Adult Use Cannabis and Adult Use Cannabis Products. Limited access areas accessible to only authorized personnel shall be established.

Display of State Issued License- Operator shall maintain a copy of its permit on display during business hours and in a conspicuous place so that the same may be readily seen by all persons entering the facility.

Deliveries and on-site consumption- operator proposes no delivery service.

Operator proposes no cannabis consume cannabis on-site.

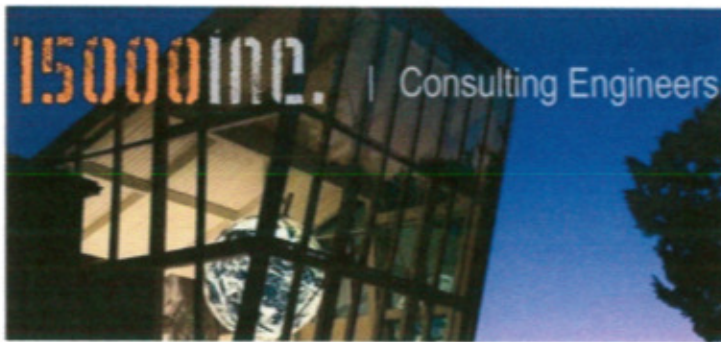
Special Events- Operator proposes no special event activities at this location.

Storefront, Signage and Window Treatments- Operator proposes a standard lettered window sign taking up no more than 10% of the entire window area on the front window only. Operator proposes using the existing back-lit sign located above our front entrance. See attached diagram.

Operator shall not advertise or market cannabis or cannabis products on an advertising sign within 1,000 feet of a day care center, school providing instruction in kindergarten or any grades 1 through 12, playground, or youth center.

Operator will post signage stating that no persons under 21 years old are allowed on premise. Operator will post signage warning against consumption of any cannabis product(s) within 200 feet of our property boundaries.

See the NorStar Management and Operations Manual for further details on signage.



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santa rosa, ca 95403
phone: 707.577.0363
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4/16/2018

Dear Sir,

We have reviewed the attached odor mitigation plan, dated 4/16/2018, for the NorStar Pharmaceuticals Dispensary.

It is our understanding that the attached plan meets, or exceeds, the requirements of the city of Santa Rosa for cannabis odor mitigation.



Sincerely,
Matthew Torre, Registered Professional Engineer
15000 Inc

City of Santa Rosa

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Procedure #:	Policy Name:	
	Odor Control Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Company: NorStar Pharmaceuticals
 112 Commercial Court, Unit #25
 Santa Rosa, CA 95403

Odor Control Plan Date: April 16, 2018

Policy:
 Odor Control

Purpose:
 To assure no offsite odor of cannabis occurs

Scope:
 Facility Exterior and Surrounding Area

Responsibilities:
 Chief Executive Officer (CEO) – to create and supervise an odor control plan

Chief Operations Officer (COO) – to implement the odor control plan

Security (SEC) – to report any odor from the dispensary that occurs offsite, to the COO or facility supervisor

General Procedures:

Implementing and maintaining an odor control system:

- a. The CEO and COO will supervise installment and maintenance of an air treatment system to ensure that there is no off-site odor of cannabis. Air treatment system will consist of carbon filters on the exhaust of the ventilation system and negatively pressurizing the dispensary in relation to outside.
- b. Outside SEC and any other staff members should immediately report any odor problems to the CEO or COO, who will implement upgrades to the system, to the facility, or to the internal cannabis handling processes of the dispensary to further deter odors.
- c. If such upgrades require the approval of any agency of the City, the CEO or COO will seek and gain such approval before implementing the new system.

It is important to our organization that our various community plans remain transparent so all community members understand the importance of mitigated cannabis odors. Thus, our mitigation plan and records will be made available to the public and documents can be requested at our dispensary.

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While cannabis products may produce an odor, under the new ordinance and state regulations all cannabis products we sell to patients will be pre-packaged at the cultivation / processing site and we will not package cannabis products on site. State regulations *CCR Code 5412. Packaging and Labeling* are explained below:

- (a) A retailer shall not accept, possess, or sell cannabis goods that are not packaged as they will be sold at final sale, in compliance with this division.
- (b) A retailer shall not package or label cannabis goods.

Active Measures

Controlled Storage: All cannabis products will be securely stored in our security storage room. The storage room will be exhausted through a carbon filter exhaust system that will remove any odors which may emanate from the pre-packaged products.

Dispensary: All areas of the dispensary will be provided with code required ventilation and air changes rates. All areas will be under negative pressure in relation to outside to prevent any odors from escaping when doors are opened.

Air Pressure and Carbon Filter Control: The dispensary will be kept under negative pressure by means of an exhaust system with carbon filters for odor removal. The exhaust discharge will be designed with a high velocity outlet to eject the exhaust up and away from any neighbors or pedestrian traffic.

Best Available Technology: The combination of carbon exhaust air filtration and building pressure control represent the current best available technology.

Design: Our dispensary will have non-operable windows, meaning they cannot be opened. All our doors will be sealed with proper weather stripping, keeping circulating and filtered air inside our facility. We will not have onsite usage of cannabis products, which will help mitigate cannabis odors to our surrounding neighbors.

Monitor, Detection and Remediate: Method for Assessing Odor Impacts

We understand the importance of cannabis odor mitigation and will do our best to prevent the issue, but if odors are detected outside our facility we have a plan to review and mitigate.

Monitor: Each day the manager or supervisor on duty will assess the on-site and off-site odors for potential release of objectionable odors. The manager on duty will be responsible for assessing and documenting odor impacts daily.

The closest adjacent businesses include Country Linen, Bavarian Tuning, MAACO Collision Repair, Karls Jr., North Bay Color Supply, Golden Gate North and KFC.

Mitigate: If objectionable off-site cannabis odors are detected by the public, the following protocols will take place:

1. Investigate the likely source of the odor.
2. Utilize on site management practices to resolve the odor event.
3. Take steps to reduce the odor-generating source.
4. Determine if the odor traveled off-site by surveying the perimeter and making observations of existing wind patterns.
5. Document the event for further operational review.

If employees are not able to take steps to reduce the odor-generating source, they are to immediately notify the Dispensary Manager, who will then notify the COO. All communication will be documented and our team will come up with a proper solution, if applicable. If necessary we will engage our certified engineer to review the problem and make recommendations for corrective action.

Staff Training: All employees will be trained on how to detect, prevent and remediate odors outside our dispensary and the proper steps outlined.

Odor Detection Documentation: The Odor Detection Form will be provided to undesirable odor observers. The form can be submitted at the dispensary.

We will maintain records of all odor detection notifications or complaints that will include the remediation measures employed. The records will be made available to the City or the general public on request.

Odor Detection Record

Name of Reporting Party _____

Phone Number () -

Email Address _____

Date _____

Time: _____

Location where odor was observed:

Weather conditions (wind direction, speed)

Date/Time in which company was notified

Company personnel were notified via (circle one):

Phone Email Web Social Media In Person

Administrative Use

Mitigation Response Measures Taken: _____

Date/Time Measures Employed: _____

Were Mitigation Measures Successful?: _____

Person in responsible charge: _____

Signature, Date and Time _____

NorStar Pharmaceuticals Décor:

Overall look imparts a feeling of rustic countryside industrialism.

- Countertops in redwood slab with galvanized metal and redwood trim
- Display cabinets made of tempered glass with locks
- Accent walls in grey reclaimed barn wood and galvanized metal
- Refinished polished concrete floors
- White walls and trim
- Customized industrial throw rugs and rug runners throughout
- Color scheme will incorporate colors from our logo, white, silver and blue

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Dispensary Interior Lighting



7 1/4" Wide Brushed Steel LED Mini Pendant

- Martini contemporary energy-efficient LED mini pendant.
- Brushed steel finish.
- Metal construction.
- Cobalt glass shade.
- Includes sloped ceiling adapter.
- Part of the Martini collection by Access Lighting.
- Dimmable with a standard incandescent dimmer.
- Includes 12 watt SSL LED bulb.
- Light output is 880 lumens.
- Light output comparable to a 60 watt incandescent bulb.
- 3000K color temperature.
- 90 CRI.
- Measures 6" high, 7 1/4" wide.
- Includes one 6", one 16" and one 22" downrod; 10 feet of adjustable cord.
- Round canopy is 5 1/4" wide.
- 6 lb. hang weight.

Indoor Lighting consists of six solar light tubes. Four of the solar light tubes contain supplemental lighting. These four solar light tubes contain 3 four Foot T8 Fluorescent tubes, totaling twelve 4' fluorescent T8 bulbs. The solar tubes should be efficient for daytime lighting use as along with the L.E.D. pendant lights.

There will be 4 energy efficient L.E.D. pendant Lights located in the dispensary area.

Outdoor illuminated sign consists of two 5' T 12 fluorescent lights. Each light has as output of 4775 each. This is considered equivalent to daylight lighting.

- Pendant lights in dispensary: energy-efficient LED mini pendant.
- Light output comparable to a 60 watt incandescent bulb.
- Light output is 880 lumens.

Outdoor lighting is considered common areas of the complex and is provided by Redwood Condo Association, the management for the complex and common area.



NorStar Pharmaceuticals Parking Analysis

NorStar Pharmaceuticals is located in the Redwood Center located at 112 Commercial Ct, Suite #25, in Santa Rosa, CA. and is governed by the Redwood Condominium Association. The previous tenant was Steele Roofing Systems conducting consultation and sales of roofing systems to their walk-up customers.

The complex has 65 painted parking spaces and 3 handicapped parking spaces painted and signed.

Our assigned spaces can be seen on the attached diagram. We have space #65, 32, 33, and 34 for customer parking. We have space in the warehouse for two employee vehicles and three enough room behind our building for three additional employee parking if needed. Refer to map A 1.00, an aerial view that shows two cars parked behind our warehouse.

NorStar Pharmaceuticals is also installing a bike rack in front of our door for our patrons use and we will give discounts to bikers and those using public transit.

Security will direct customers to the correct parking spaces.

The complex has two driveways for ingress and egress.

See the attached parking diagram for further details.

Improvements to the parking situation will include monitored parking by our security guard who will monitor and direct traffic as necessary to eliminate any potential adverse traffic or parking situations and to ensure that our customers do not negatively impact surrounding business.

Criteria for Merit Based Review

Local and State Compliance

State Regulation- Operator has submitted a Standard Operating Procedure (SOP) called the NorStar Pharmaceuticals Management and Operations Manual Section One General Operations, 'Local and State Compliance Plan' detailing our process for remaining compliant with state and local regulations.

State departments that may propose regulatory changes include but are not limited to; Bureau of Cannabis Control, the Department of Food and Agriculture, the Department of Public Health, the Department of Pesticide Regulation, and the Board of Equalization.

Local regulation- Local departments that may propose changes include but are not limited to; Building Dept, Fire Dept, Planning Dept, and Zoning Dept.

Please see the Management and Operations Plan Section One, 'Local and State Compliance Plan' for further details.

'Local' defined as City/County/regional requirements.

Santa Rosa General Plan Policies- Proposed operations contained herein are consistent with the goals and policies of all elements of the General Plan, and any applicable specific plan in that the commercial cannabis business is located in an appropriate commercial and industrial district designated to support such use. The proposed operation is internally consistent with other applicable provisions of Title 20 of the Code.

The proposed operation will result in land uses that are compatible with existing and future uses and will not be detrimental to the public interest, health, safety, convenience, or welfare of the City.

Santa Rosa City Code Locational and operational Requirements- Operator has met the city locational requirements in compliance with the requirements established in Tables 2-6 and 2-10, of Santa Rosa City Ordinance ORD-2017-025, operator shall be subject to the following location requirements:

- Overconcentration. To avoid overconcentration, operator shall not be established within 600 feet of any other Medical Cannabis Retail established within and permitted by the City of Santa Rosa
- Setback to schools. Operator shall be subject to a 600-foot minimum setback from any "school", as defined by the Health and Safety Code Section 11362.768
- Measurement of distance. The distance between Medical Cannabis Retail and a school shall be made in a straight line from the boundary line of the property on which the

Medical Cannabis Retail is located to the closest boundary line of the property on which a school is located

- Location of a new school after permit issued. Establishment of a school within the required setback of a Medical Cannabis Retail facility after such facility has obtained a Conditional Use Permit for the site shall render the Medical Cannabis Retail facility legal non-conforming and subject to the protections and provisions of Chapter 20-61 (Non-Conforming Uses, Structures and Parcels)
- Visibility of entrance. The storefront entrance of a Medical Cannabis Retail facility shall be in a visible location that provides an unobstructed view from the public right of way

Site Management-

Experience in Operating a Cannabis Business- Our Executive Director and Chief Operations Officer is Dave McCullick. Mr. McCullick has been a cannabis activist and canna-business owner for more than thirteen (13) years. A US Navy Veteran, Mr. McCullick opened his first dispensary, D&M Compassion Center in 2005 in Clearlake, California. Dave operated D&M Compassion Center as Executive Director and Purchasing Agent from 2005 until 2008 when Mr. McCullick left the company to open Sonoma Patient Group in Santa Rosa.

Mr. McCullick opened his second dispensary, Sonoma Patient Group, in Santa Rosa in 2008. Dave was one of the original founders of Sonoma Patient Group and served as Vice President and Chief Purchasing Agent from 2008 until 2016 when he left the company.

Our General Manager Jennifer Woodbury has twelve (12) years of extensive experience working closely with patients and caregivers in the legal cannabis retail, manufacturing and cultivation environments. Mrs. Woodbury specialized in providing one-on-one consultations for new and returning medical cannabis patients providing direction on self-titration and micro dosing.

Qualifications and background of principals- Mr. McCullick has owned and operated two dispensaries, including Sonoma Patient Group in Santa Rosa.

Mr. McCullick has spent the last 9 years teaching at Oaksterdam University, the nation's first cannabis college located in Oakland, Ca. Dave created the curriculum for and teaches Safe Procurement and Allocation (buyers class teaching how to judge and grade cannabis), Patient Relations and Customer Service (a customer service class for budtenders), and Dispensary and Cannabusiness Management and Operations, all with an emphasis on regulatory compliance and SOP development.

Mr. McCullick also taught for, and created the initial curriculum, for the Cannabis Training University 2012 and the Florida Medical Marijuana Training Institute in Miami, FL. In 2014.

Dave has also written for many trade industry magazines such as West Coast Cannabis, Treating Yourself Magazine and Alternet.org. Additionally, Mr. McCullick has spent much of his career working with cities and counties in California and across the United States developing sensible cannabis regulations at the local level. He also serves as a consultant to assist businesses in the cannabis permitting application process and provides compliance training to dispensaries and other licensed cannabis businesses that have obtained state licenses.

In 2017, Mr. McCullick co-authored 'Starting and Running a Marijuana Business' with Debby Goldsberry, writing 15 of 22 chapters.

Mr. McCullick served as Chief operations officer for Aquarius Cannabis and spent 14 months as the General Manager of Magnolia Wellness, one of the largest dispensaries in the state, located in Oakland, California. As GM of Magnolia Wellness Mr. McCullick was responsible for day-to-day operations and staff training. While serving as the GM at Magnolia Wellness Mr. McCullick assisted in obtaining the first East Bay on-site cannabis consumption permit in the City of Oakland as well as worked to get the first ever outdoor cannabis farmers market approved and licensed in Oakland.

Mr. McCullick is currently working back at Magnolia Wellness as a consultant and as a compliance officer training the staff on the new rules and regulations that took effect this year and writing Magnolia's new SOP's. Mr. McCullick is also in-charge of getting their new Consumption Lounge remodeled.

Mr. McCullick was recently asked to work as a court appointed cannabis expert writing reports and interviewing defendants and prosecutors and testifying in court on cannabis yields, values and dosages for California municipal jurisdictions. Different courts and attorneys have cases that require cannabis expert testimony to determine strategy for prosecution and defense in pending and future cases.

General Manager- Jennifer Woodbury

Jennifer graduated from Ocean city High School in Ocean City, NJ in 1992. Jennifer received a Bachelor of Science Degree in accounting from La Salle University in Philadelphia, PA. 1999 found Jennifer graduating from South Philadelphia Beauty Academy and became a licensed cosmetologist in PA. She has subsequently been licensed as a cosmetologist in Ca. and NJ.

In 2003 Jennifer worked for and became a licensed realtor in NJ. Jennifer worked for Accurate Income Tax in PA. and has worked as a cosmetologist and hair stylist. Jennifer is the General Manager of Happy Chief, LLC a company that sells filtration systems for pipes and bongs used by cannabis consumers.

Jennifer is currently also managing investment properties for Bay Beginnings, LLC.

Jennifer has spent the past 12 years working closely with patients and caregivers in the cannabis retail, manufacturing and cultivation industries for Happy Chief, LLC., NorStar Genetics Collective (no longer active), and TGA seeds.

Jennifer's experience working with cannabis patients and caregivers will ensure that our customers receive the highest level of care possible. Jennifer's experience as an accountant will ensure timely, accurate collection and reporting of sales and collected taxes to the appropriate authorities.

Business Plan- Operator has submitted their business plan.

Operator has also submitted our Management and Operations Manual, Section one (1), General Operations which includes, 'Recordkeeping, Storage and Document Provision Plan' covering our Track and Trace requirements and process. This Management and Operations Manual, Section One (1) also includes SOP's to prevent Diversion, No Redistribution of Cannabis Medicines Allowed, Local and State Compliance Plan, Consumption Restrictions, Maintenance of Electronic Recordkeeping, Securing Limited Access Areas, and Process for Allowing Individuals Access to the Premises

Protecting Children: Addressing the Concern about Children and Young People- operator will maintain strict regulatory compliance over operations to prevent diversion, to always protect the youth of our community. NorStar Pharmaceuticals will implement stringent anti-diversion policies to reinforce California's law that cannabis will not find its way to non-patients or youth. This includes ensuring that all cannabis is packaged correctly in child proof packaging that meets or exceeds regulatory requirements, the packaging rules as mandated by the State and local regulations.

See the NorStar Management and Operations Manual for our SOP's for monitoring cannabis and our diversion plan.

Management Plan to prevent and respond to potential nuisance impacts on adjacent properties, public areas and the surrounding neighborhood, e.g. loitering, trash, local contact-

Operator has submitted our Management and Operations Manual, Section one (1), General Operations which includes but is not limited to the following SOP's; Local and State Compliance Plan, Hours of Operations, Maintaining a Barrier Free Entrance, Nuisance Prevention, Control of Litter, Debris, Trash, & Graffiti, Odor Mitigation Plan, Noise Control, Consumption Restrictions, No Redistribution of Cannabis Medicines Allowed, No Onsite Cannabis Cultivation, On-site Community Relations Staff Person, Maintain a Clean, Orderly, Sanitary Facility, Adherence to Americans with Disabilities Act, Management of a Community Benefits Plan, Maintenance of Electronic Recordkeeping, Providing Education and Referrals on the Benefits and Potential Abuses of Cannabis, Process for Allowing Individuals Access to the Premises, and Securing Limited Access Areas.

Operator will designate a Community Relations Staff Person to act as a Neighborhood Liaison, or Ombudsman, to address the concerns of the neighborhood. NorStar Pharmaceuticals is

confident that we can work collaboratively with neighbors to develop policies, procedures and practices that ensure safety and security of the neighborhood, and which insulates our dispensary from providing access or promoting cannabis use for youth. Here's how we'll do that:

NorStar Pharmaceuticals will strive to work with all our neighbors to create open lines of communication for all community concerns and needs and, in that regard, we shall designate a Neighborhood Liaison.

Our Neighborhood Liaison will be tasked with the following:

1. Reaching out to our neighbors to create a specified Neighbor Plan for each neighboring business or organization so we can address each of our immediate neighbors' concerns methodically and they can give input on our operations in a meaningful way.
2. Coordinating and facilitating a cohesive Neighborhood Watch Program, and authorizing our Security Personnel to serve and protect our neighbors as well as;
3. Distribution of the Neighborhood Liaison's contact information to all neighbors and to the City's police and Planning Dept. personnel;
4. Ensuring the exterior of the building is aesthetically pleasing and that its appearance is maintained through daily employee walkthroughs and regular upkeep by a landscaper;
5. Ensure that NorStar Pharmaceuticals customers move in and out smoothly and that there is no loitering and no use of cannabis products on the premises;
6. Developing and updating written policies and procedures for solving any future issues that may arise as to the safety and appearance of the NorStar Pharmaceuticals property and facility.
7. Reaching out to the Santa Rosa Police Department, our Sheriff's Office, and our District Attorney's Office for input and keeping those important lines of communication open.

Developing a Neighborhood Committee

We will develop and facilitate a Neighborhood Committee which will meet quarterly, or more as needed, and will be tasked primarily with identifying neighborhood issues and crafting realistic solutions. All neighborhood businesses and residents within 1000' of the dispensary will be invited to apply to sit on the Neighborhood Committee to ensure neighborhood issues are addressed.

Holding advisory Council Slots for Neighbors

For those neighbors who want to give more input and be involved in advising the Board and staff, we will hold at least one slot on our Advisory Council for a neighbor, and possibly more than one depending upon interest. In this vein, we will also be seeking an Advisory Council member who opposed the City's decision to grant a dispensary permit

or that clearly voiced opposition to passing any local cannabis laws. This way, other opposing voices can be heard, and concerns can be addressed promptly.

 Performance Timeline from land use approval, plan check and construction to opening.

NOTE: Santa Rosa City application requests 16 different SOP's with the application. The State of California requires 12 specific SOP's starting July 1, 2018 to obtain licensing. Operator is turning in a total of 120 Standard Operating Procedures, which includes the required SOP's for both the city and the state. The additional 92 SOP's are to show operator has the knowledge and qualifications to operate successfully. All SOP's have been written by or Chief Operations Officer. Our COO has operated one Bay Area and two North Bay dispensaries. Most of the SOP's have been proven and accepted by other cities regulating cannabis sales including Oakland, CA.

Neighborhood Compatibility

How the proposed operation fits into the stability and quality of the surrounding

neighborhood- Proposed operation is compatible in reference to Security, Parking, lighting and setbacks to other existing land uses. The property is Zoned CG and is compliant with the Santa Rosa General Plan and ORD-2017-025, Tables 2-6 and 2-10. See the attached Security Plan, Lighting Plan, and parking plan for more details.

How Odors would remain within the building and not be detectable from adjacent properties

or business- Operator has submitted an Odor Mitigation Plan certified by an engineer to ensure no off-site odors are detected on adjacent properties. See the attached Odor Mitigation Plan for details.

Providing an enhanced retail experience- Operator has designed the facility with a fluid and attractive site plan using high quality materials and displays. See attached diagram for more details.

Operator has written an extensive SOP for providing the Best Customer Service Experience. See the attached Management and Operation Manual Section 5, Staffing Plan for the SOP titled 'Providing the Best Customer Service' for further details.

As part of our Management and Operations Manual, Section four (4) 'Point of Sale Operations', operator has written the following extensive SOP's to enhance the customer retail experience; Ensure Proper Dosage and Use, Supervision of Dispensary Operations, Limits on Dispensing, Labeling of Cannabis Products, Properly Dispensing Cannabis to Customers, Posting Prices and Products, Reviewing and Reporting Dispensing Errors, and Denial of Sale.

As part of our Management and Operations Manual, Section Three (3), Customer, Patient and Caregiver Registration operator has written the following SOP's; Age Limits on Membership,

Membership Limited to Customers, Patients and Caregivers, Entering the Facility, Mandatory Information Given to Members, Confidentiality of Information, Ensuring the Integrity of Doctor Recommendations, and Providing Wellness Services to Members.

See attached description of quality materials used for inside. (Operator not altering the current outside look, structure or façade of the building).

Clear and Attractive Entrance, pedestrian orientation, bike parking and access to transit-

Proposed operation has an attractive entry (see attached diagram) with proper pedestrian orientation well seen from the commercial street and sidewalk areas. Operator has proposed installing a bike rack.

Public transit, for both City and County bus routes, is located at the corner of our street, the corner of Commercial Ct and Santa Rosa Ave. See the NorStar Management and Operations Manual for further details on 'Maintaining a Barrier free entrance'.

See attached diagram of the facility from the street view.

Neighborhood Enhancement

Quality and Extent of Improvements to the site, building and surrounding neighborhood-

Improvements to the site do not include any structural changes that would affect the outside of the site structurally, the building or the surrounding neighborhood.

Improvements do include keeping the façade clean, properly maintained landscaping, and presentable in consistence with surrounding business.

Improvements to the site, building, and surrounding neighborhood will include monitored parking and traffic control by our security guards who will monitor and direct traffic as necessary to eliminate any potential adverse traffic or parking situations.

Additional improvements include enhanced security for the site, building and surrounding neighborhood. Our security staff is charged with monitoring all activity within 200 feet of the dispensary enhancing the overall security of the entire neighborhood. Any unauthorized activity at our location or within 200 feet of our location will be monitored, challenged, observed and reported to local law enforcement and any business or residence effected by said activity.

The NorStar security video surveillance system will also bleed over and cover some of our surrounding businesses allowing us to provide recorded video surveillance footage to our neighbors upon request.

Landscaping will be improved and regularly maintained by operator.

Environmental benefits- include the use of 6 solar light tubes, strategically placed, to bring in outside light allowing the operator to decrease the amount of necessary internal lighting placing less demand on the energy grid.

Additional environmental benefits include the use of low energy consumption lighting throughout the facility.

Operator will use Best Practice Standards for the conservation of water and energy sources and will ensure our storm drains are kept clear and free of trash and debris that could negatively impact storm drain operation. See the NorStar Management and Operations Manual 'Seeking and Maintaining Certification as a Green Business' for further details.

For control of litter, debris, trash and material operator will ensure the property and the adjoining premises are free of trash, litter, debris, and graffiti. Garbage cans will be made available inside the dispensary as well as externally near the entrance and parking area. Clean-up days will be organized if needed and any graffiti will be cleaned up within 72 hours. See our Management and Operations Manual, Section One (1), 'Control of Litter, Debris, Trash and Graffiti Plan' for further details.

Community Benefits- include employment opportunities for local-residents. Operator is committed to hiring the entire staff from a pool of local applicants. Employment opportunities will include flexible scheduling, competitive salary, medical benefits and holiday bonus program.

Operator will start with fourteen (14) full-time employment positions. Operator will strive to hire a minimum of 50% of our staff directly from within the City of Santa Rosa and will only go outside of Santa Rosa if there is a lack of qualified interested candidates.

Charitable donations- Applicant believes that it can and should have a critical role in the delivery of medical marijuana healthcare and to that light we also believe that we have an important fiduciary obligation to be a "good neighbor" and provide benefits to our community as part of our healthcare mission. Therefore, we view our Community Benefits Plan as a blueprint for how we plan to accomplish our Mission.

Operator will make charitable cash donations to local charities and programs of interest to the residents of Santa Rosa. Donations the first year will be less than in following years in which the donation amount will be increased.

Applicant has plans to include in its Community Benefits Plan, a grant program. We anticipate awarding funding annually through our grant program. While we recognize that our program will require refinement, we anticipate awarding grants to organizations with a 501(c)3 status.

NorStar is proposing, for the first year, upon verification of 501 (c) 3 status, to make charitable cash donations in the amount of \$10,000.00. This will be broken down and spread among three charities the first year. The Finley Center will receive \$5,000.00 and the other \$5,000.00 will be

evenly split between the YWCA receiving \$2,500.00 and \$2,500.00 to another charity yet to be identified. We would like to get feedback from our customers as to where to donate the remaining \$2,500.00.

Performance TimeLine:

NorStar Farmaceuticals performance timeline from obtaining a Conditional Use Permit to dispensary opening is three months.

When CUP is issued, NorStar will apply for a building permit and an electrical permit. Upon approval of the building and the electrical permits, construction will take 1.5 months to complete. Norstar will then apply for building and electrical inspections, 2 weeks time. After inspections are approved painting and adding décor will take 1 week. Then a two week training period will take place for employees. After training is completed the dispensary will be ready to open.

Please note the time frame of 3 months includes one week allotment for extra time if needed.

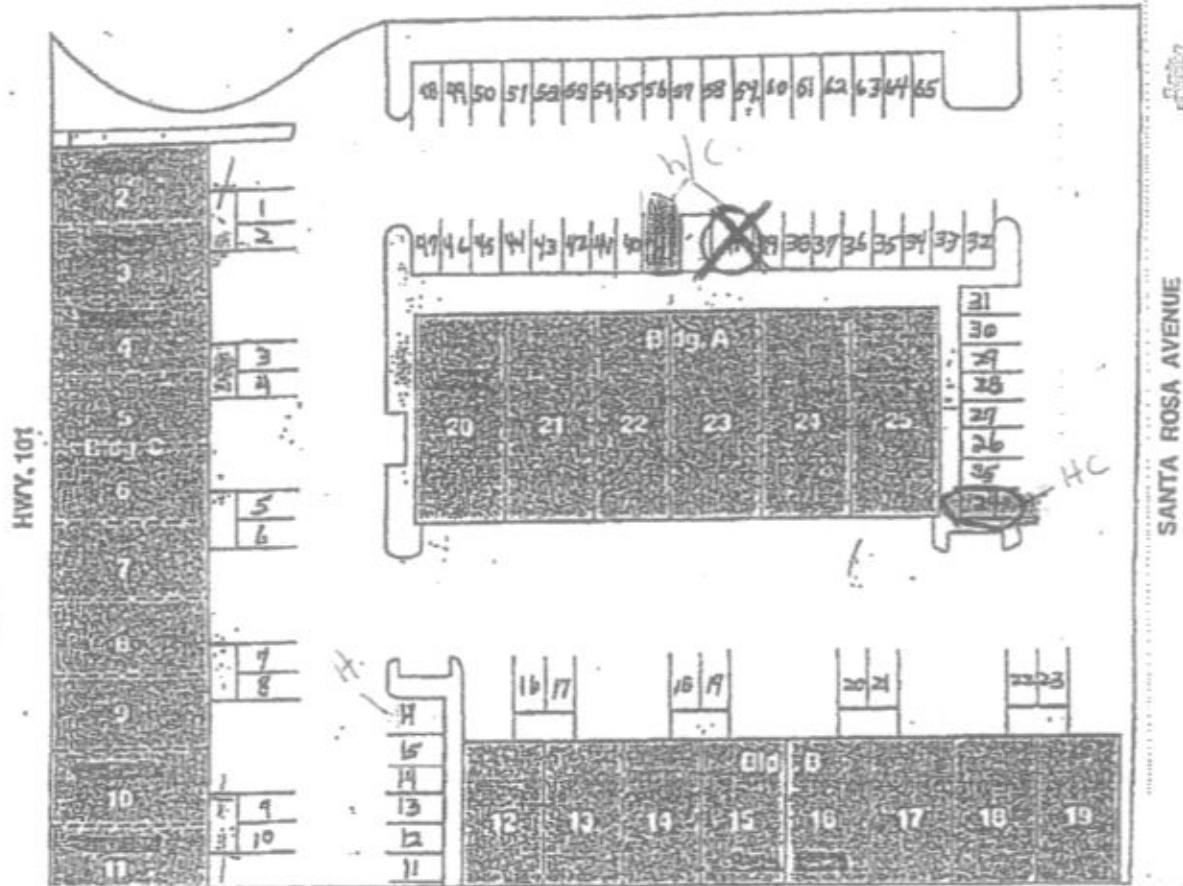
City of Santa Rosa

APR 17 2018

Planning & Economic
Development Department

REDWOOD CENTER

112 Commercial Court, Santa Rosa, California



Handicap parking # 14 # 24, # 40

unit 25 parking # 32, 33, 34, 65



Dispensary Permit Business Plan

City of Santa Rosa

APR 17 2018

Planning & Economic
Development Department

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Business Plan

This is the written BUSINESS Plan for NorStar Pharmaceuticals ("We", "Us", "Our"). This plan addresses and meets the application requirements of the State of California Medical Marijuana and Adult Use Program Rules and Regulations ("Department").

EXECUTIVE SUMMARY

The NorStar Pharmaceuticals ("Applicant") is a dispensary collective organized as a LLC, Inc. under the laws of The State of California. Founded in 2018, we plan to operate a medical and adult use cannabis dispensary at 112 Commercial Ct. Suite 25, Santa Rosa, CA. if awarded a permit by the city. Our planned dispensary will use a patient-centered care model, collaborating with community stakeholders to provide quality and affordable care to all residents, including minority and underserved populations.

We will provide our patients with safe products, professionally packaged, and presented in a compassionate, service-focused way in a comfortable setting by well-trained staff. Patient education is a key element of our approach and will be part of an array of wellness and support services (transportation, interpreters, and care advocates) we offer our patients.

NorStar Pharmaceuticals is governed by leading professionals and community leaders with over 21 years in combined management, finance, legal, government, and industry expertise. Our team have extensive experience working with the city and state on a variety of issues. This breadth of experience and deep ties to the community will be needed to help guide us through the many complex issues facing cannabis dispensaries in California and across the country.

Our dispensary is being designed and built to feature state of the art technology with forward-looking green practices. Security and safety are critical components of our operations. We also plan to take every effort to be "good neighbors" in the community. This means providing extensive community outreach, including hiring, indigent care, and public involvement. It also means minimizing any negative impacts or nuisances that may arise from our operations.

Our key objectives are:

- To provide safe and legal access to medical cannabis for all qualified patients regardless of their ability to pay;
- To reduce the barriers and improve access to medical cannabis and its potential benefits, including the potential to reduce health disparities in underserved and minority residents in Santa Rosa; and
- To revitalize our neighborhood and contribute to Santa Rosa's wider economic development through job creation, increased tax base, and education and outreach.

Finally, NorStar Pharmaceuticals has sufficient capital in place to furnish, secure, and start up the proposed dispensary. We believe that we have more than sufficient capital to cover estimated costs of designing, furnishing, operation, compensation of employees with fringe benefits, equipment costs, utility costs, legal compliance, and other O&M as needed.

THE NEED AND OPPORTUNITY

THE POTENTIAL TO ADDRESS HEALTHCARE DISPARITIES FOR UNDERSERVED RESIDENTS

Healthcare Trends

California's cannabis market is quickly evolving. Medical marijuana has been legal since 1996, when voters passed the Compassionate Use Act. In 2015, California legislature finally passed laws creating a statewide scheme for licensing industry businesses. These new laws, collectively called the Medical Cannabis Regulation and Safety Act, create permit processes, tax schemes, and rules for cultivation, manufacturing, and retail sales. Licenses will be available in January 2018 under a set of comprehensive regulations designed to assure product safety and the seed-to-sale tracking of all marijuana.

NorStar believes these new laws will bring clarity to the often-murky marketplace, where clandestine grow houses and uninspected manufacturing facilities are the main suppliers of medical cannabis products. Facilities such as NorStar Pharmaceuticals will have access to standardized medicines at decreased prices, increasing their ability to consistently stock retail locations and gain more profitable sales.

Over the past decade, studies increasingly have demonstrated cannabis' ability to reduce pain, control nausea, improve appetite, and ease many symptoms associated with chronic, debilitating, and terminal medical conditions—with virtually no harmful side-effects. Although slow at first to endorse the medical benefits of cannabis, the health community is now almost wholly behind it.

Driven by new research and broad public health community support, several states and the District of Columbia now have adopted medical cannabis laws in the U.S. In 1996, California became the first state to legalize the use cannabis for medical purposes. Several states now also have Adult Use Cannabis laws.

Concurrent with the acceptance of medical cannabis, patient-centered care (PCC) also has emerged as a fundamentally new model and approach to health care in the United States. The PCC approach stresses the role of doctor as educator and enabler of an empowered patient who takes an active role in making health-care decisions and implementing them not just in traditional medical choices, but also in complementary care and in life-style changes.

This new healthcare approach has dramatically increased self-reported patient satisfaction and improved clinical outcomes (measured by survival and longevity) and patient quality of life (measured by such objective criteria as mental health, ability to return to work, and independent functioning). It even has reduced malpractice litigation.

This new understanding of the mission and responsibility of health care has had an impact on the treatment and care of patients with terminal, chronic, or debilitating illnesses. It forces treatment to focus on the long-term management of these conditions as a quality of life issue. Instead of viewing these conditions as falling "by definition" in the category of "untreatable," the clinician is now expected to help patients find ways to make life with serious medical conditions livable.

Health Disparities

A large number of Santa Rosa residents are people of color, and many of these residents live below the poverty line. As is the case in many urban communities, most of the people of color and low-income residents face healthcare disparities. Indeed, diseases that affect the population as a whole, disproportionately affect low-income and minority populations who typically experience multiple debilitating health conditions at the same time.

In Santa Rosa and other areas in California, people of color face health disparities across a wide range of debilitating illnesses. For instance, Black men have the highest overall cancer rate, and Black women are more likely to die from cancer even though White women are diagnosed with it more often. Blacks also are almost two times and Hispanics are 1.4 more times likely to test HIV-positive compared to Whites.

The underlying causes for these health disparities are rooted in a history of systemic discrimination, poor social and environmental conditions, and lack of access to quality medical care, according to the American Public Health Association (APHA). Lack of access can include transportation challenges, language barriers, and lack of agency in navigating healthcare options.

Transportation Challenges

Geographic challenges to health care can be formidable in cities like Santa Rosa. Lower income patients may not own a car. Distances to public transportation that are considered negligible to healthy Santa Rosa residents may be prohibitive to those who are sick, particularly with elderly residents.

Language Barriers

Language barriers are a serious obstacle to any kind of healthcare and they make patient-centered care virtually impossible for many Santa Rosa residents who are non-English speakers. In California, for example, the number of people who speak a language other than English exceeds 40 percent. Patients who face language barriers are less likely than others to have access to regular medical care.

Lack of Agency Navigating the System

A very commonly reported reason for patients, especially low-income patients, do not seek treatment for health concerns until the illness becomes severe is that they do not know how to go about finding the appropriate kind of specialist or clinician. Unfortunately, trying to locate appropriate care providers themselves is often an exercise in frustration since recorded messages and automated switchboards rarely offer the answers they are seeking.

To eliminate health disparities in communities like Santa Rosa, APHA recommends working to:

- Prevent illness by fostering healthy behaviors, healthy community environments, and institutional support of good health outcomes; and

- Reduce the severity of illness and injury by providing quality, accessible medical care to all.

While there have been few, if any, studies regarding medical cannabis disparities, there is little reason to believe that the same disparities for minority and underserved populations that exist across other healthcare issues do not, and will not continue to, exist in the emerging medical cannabis healthcare setting.

A. The Opportunity

We believe that Santa Rosa's medical cannabis regulatory framework provides an unique opportunity for NorStar Pharmaceuticals not simply to provide adult use and medical cannabis, but also to: (a) provide a patient-centered care approach to help remove barriers, improve access, and provide holistic and preventative care for Santa Rosa residents, including underserved and minority residents; (b) serve as a "best practice" dispensary collective for targeted outreach and support services for underserved populations in communities across the country; (c) become an industry model of green dispensary operations; and (d) provide cutting edge research and development that will help advance the cause of compassionate healthcare.

IMPLEMENTATION STRATEGY

NorStar Pharmaceuticals dispensary collective will use a community-driven, patient-centered care approach that will benefit all Santa Rosa residents, including delivering care in a way that makes quality, affordable medical cannabis available to underserved minority, low-income and indigent populations. This complex commitment dictates the features of our implementation strategy:

- Patient-centered care,
- Complementary therapies and support services,
- A professional clinical setting,
- Product variety,
- Scientific quality control,
- A skilled and knowledgeable staff,
- Investment in sustainable operations, community outreach, and enabling/support services.

A. Patient-Centered Care

The crucial element of our PCC approach will be meeting our patients where they are: communicating with them in the terms they are comfortable with. This requires that our staff be well-trained, comfortable with diversity, and competent to interact appropriately with individuals from different backgrounds and levels of “medical literacy.” As a “socio-culturally competent” caregiver, NorStar Pharmaceuticals will educate and empower its patients so that they share responsibility for their own healthcare decision-making and healthy lifestyle choices. Our PCC-focused dispensary will provide:

- A welcoming environment,
- Respect for patients’ values and expressed needs,
- Patient empowerment,
- Staff socio-cultural competence,
- Help with coordination of care across providers,
- Emphasis on patient comfort and support, and
- Community outreach and collaboration.

Our staff, facility, and operations will prioritize education and patient empowerment. Maintaining a holistic focus and supportive services, it will seek to identify underlying factors that broadly influence quality of life, with emphasis falling on pain management, avoiding unhealthy behaviors, lifestyle change, improving physical conditioning, adopting better nutritional practices, reducing stress, and taking advantage of the profound mental health benefits that patients can derive from interpersonal support such as counseling, support groups, and community activities with those suffering from similar conditions.

As noted in our discussion above, research has shown PCC to result not only in far higher levels of patient satisfaction with their care, but also in better clinical outcomes and quality of life. While we are not practicing medicine, embracing PCC as the centerpiece of our model puts NorStar Pharmaceuticals ahead of the curve in this rapidly growing trend in healthcare.

Complementary Therapies and Support Services

It is crucial to our implementation strategy that we are not simply a cannabis dispensary. Our focus is on overall health and wellness, and as such, we must be a

wellness clinic that offers more than medical cannabis. Offering an array of peripheral services is central to our holistic, patient-centered approach to healthcare.

We understand that we are not replacing traditional health care, but we seek to become its essential complement for patients who appreciate and need a customized, holistic, and coordinated approach to wellness. We will offer several types of support services:

- An on-site library providing, patient information on medical cannabis, holistic healing, legality issues, and cannabis advocacy/activism,
- Complementary and alternative wellness therapies, offered for free or at discounted rates (NorStar Pharmaceuticals will subsidize the fees charged by outside providers such as acupuncturists, chiropractors, etc.),
- Free classes, workshops, and support groups, and
- Patient advocacy and care coordination/referral to other providers and organizations.

Although there is a flourishing alternative medicine industry in Santa Rosa, our wellness center will have a distinct advantage of integrating patient care at one location and offering services free of charge or, in the cases where we bring in skilled outside practitioners, at significantly reduced rates subsidized by member transactions and more effectively targeted to underserved populations.

Professional Clinical Setting

The compassionate cause of medical cannabis is ill served by reminders of the counterculture or association with the image or ethos of the “stoner.” Our atmosphere will be designed to move medical cannabis away from any association with the counterculture or even with the casualness of uninformed home cultivation and focus attention on its scientific and medical legitimacy. In keeping with this, our dispensary collective will maintain the professional look and feel of a professional medical service clinic, and the fact that our products are scientifically cultivated and tested will be the key element in our strategy on which we plan to build public awareness of our “brand.”

Strain Variety

Different strains of cannabis have different therapeutic and palliative effects, some offering relief from a given condition more than others. Furthermore, patients with serious medical conditions, such as those with wasting syndrome or undergoing

chemotherapy for cancer, can have very specific tolerances, intolerances, and idiopathic reactions to medication. To offer patients customized and scientifically precise treatment options, it is critical that we provide as wide a variety of strains of medical cannabis and as great a variety of delivery methods as possible. Relying on patient members, we will provide a wide range of edibles as soon as we begin our operations.

Scientific Quality Control

As discussed below, all our products will be tested for purity and potency by an independent testing laboratory and bear a guarantee of scientific quality control. We will work with one or more of our state certified labs to provide independent lab testing services.

Skilled and Knowledgeable Member Staff

Without a skilled and knowledgeable staff, our product diversity and PCC approach would be of little benefit to most patients. A crucial feature of our strategy is the extensive training that our staff will undergo to be able to advise patients on such things as the specific effects and side effects of various strains or delivery methods, their benefits for specific medical conditions, and their interactions with other medications, as well as with drugs and alcohol.

Providing patients with types of information they cannot obtain in traditional health care settings conforms with our general strategy of offering something that does not replace traditional health care but complements it by providing something critically lacking in it. The need for complementary care is particularly evident in the case of medical cannabis because physicians typically recommend only that the patient use it, without specifying the strain or delivery form. This creates a patient information deficit and education need that our approach is designed to address. Because many dispensaries do not take this need seriously enough, our educational approach will quickly distinguish our "brand."

B. Investment in Community Outreach and Enabling Services

Many states have dispensaries offering a variety of peripheral services on a patient-centered care model. NorStar Pharmaceuticals approach builds on successful dispensary

models, improves the scope and type of community outreach, and delivers more targeted services that will benefit all residents of Santa Rosa, including underserved and minority residents.

ORGANIZATION AND COMPLIANCE SUMMARY

C. Legal Entity: A Medical Cannabis Collective

The NorStar Pharmaceuticals is a dispensary collective organized as a LLC, Inc. under the State of California Law. Founded in 2018, NorStar Pharmaceuticals plans to improve access to medical cannabis and advance the cause of compassionate, patient-centered care for seriously ill patients, particularly minority and low-income residents from underserved neighborhoods. We plan to accomplish this through a patient-centered care model, a variety of partner and collaborative relationships with key community stakeholders, and a commitment to the delivery of quality and affordable preventative healthcare with outstanding patient support services.

NorStar Pharmaceuticals will be located at: 112 Commercial Ct., a 1397 (sq. ft.) square foot facility with a three-year proposed lease option from Bay Beginnings, LLC. The landlord's corporate address is 112 Commercial Ct., Suite 25, Santa Rosa, CA.

See Attachment, Letter of Intent to Lease.

The building is located within a commercial and industrial zone and complies with all of the site requirements mandated by the ordinance and zoning. Our hours of operation will be from 9 am to 8 pm, Monday through Saturday and Sunday 11 am to 6 pm. Closed Thanksgiving and Christmas.

As discussed below, our dispensary collective is governed by a three-person Board of Directors, with Joel Woodbury serving as Chairman of the Board and Dave McCullick overseeing daily operations as Executive Director.

See Attachment, Articles of Incorporation and Bylaws

Organizational Compliance: Operations and Status

Our business model is dictated by two constraints: the legal conditions placed by state and local governments on the operation of medical cannabis dispensary collectives and the commitments specific to our mission.

As a medical cannabis dispensary, NorStar Pharmaceuticals facilitates the gathering of the most sought after medical cannabis strains. In organizing our operation, NorStar Pharmaceuticals has taken great care to ensure patient and neighborhood security, to design our operations so as to prevent cannabis diversion, and to comply with all applicable laws, including state and local laws. To ensure lawful operation, NorStar Pharmaceuticals will:

- Require patient verification,
- Acquire, possess, and distribute only lawfully cultivated cannabis,
- Not distribute and/or sell cannabis to non-members,
- Comply with California and Santa Rosa Cannabis program requirements,
- Provide adequate security to ensure patient safety and prevent the negative impact of any nuisance to surrounding homes and businesses,
- Keep accurate records and follow accepted cash handling practices, including regular bank runs and cash drops, and maintain a general ledger of cash transactions,
- Comply with possession and cultivation guidelines,
- Obtain necessary business licenses/permits and pay required taxes, and
- Meet IRS tax requirements for dispensaries.

NorStar Pharmaceuticals will operate using Track and Trace and Track all cannabis that is processed, acquired, distributed, and consumed by members. All transactions will be internal to the collective and involve members interacting only with one another. No cannabis will be acquired from or distributed to non-members or non-licensees. Monies tendered will be for the sole purpose of reimbursing the costs of products and services provided, as well as the overhead costs of operating the dispensary, including its peripheral wellness services and community outreach programs.

Transactions between staff and members will be consultative in nature, focused on matching product with patient needs in light of his or her medical condition, specific treatment limitations, and history of response to previous dispensary products.

1. Membership Compliance

Membership in the collective is strictly limited to members in good standing. To be a member in good standing an individual must be a properly enrolled member whose status as a currently *qualifying patient or caregiver*¹ or qualified Adult Use customer, has been duly verified at the time he or she seeks services.

Under California law, NorStar Pharmaceuticals members must have a medical condition² for which cannabis is recommended in writing by a physician as a treatment. Although verbal recommendations may be permitted by law, NorStar Pharmaceuticals will require all applicants for membership to provide a written proof of their physician recommendation, and we will require members to carry their recommendations or medical cannabis ID cards with them whenever in possession of medical cannabis.

2. Transparency and Oversight

To ensure transparency of our operations and easy verification and documentation that we are operating within the limits of state and local regulations and that our operations do form a trackable closed loop with no outside diversion or acquisition, we will enforce strict oversight procedures regarding membership, facility access, operations, and documentation of legal compliance.

- NorStar Pharmaceuticals will verify all members' medical cannabis recommendations and medical cannabis identification cards and track when they expire so as to exclude from membership those whose credentials are invalid or have expired.
- Medical cannabis will only be distributed on the dispensary site.
- Except for our security, only dispensary collective members (customers, patients and caregivers) will be allowed into the facility.
- All members must have a valid form of government-issued photo ID that matches their medical cannabis recommendation or ID.
- All employee members responsible for the handling, dispensing, providing and cultivation of cannabis will be duly enrolled members: either customers, patients or designated caregivers.
- Membership of those caught diverting cannabis to non-members or for non-medical use will be revoked. We will not dispense cannabis to anyone whose membership has been revoked.

Verification, Paperwork, and Tracking

¹As defined by statute and/or applicable law.

²Conditions are named in the California Health and Safety Code, Section 11362.7 et seq.

Verification.

California allows patients and their designated caregivers to enroll in a voluntary state or local medical cannabis patient ID program that provides them with a government-issued card identifying them as legally-qualified medical cannabis patients or caregivers. These medical cannabis ID cards allow for easy verification of the cardholder's current eligibility status through a telephone or electronic verification system that dispensaries and law enforcement can access. To be eligible for membership in NorStar Pharmaceuticals, we will verify a prospective member as follows:

- The individual's identity must be verified by a form of government-issued photo ID (separate from any medical cannabis ID), this includes Adult Users showing they are over 21.
- The medical patient or caregiver must present proof of California State residency.
- The enrolling officer of the dispensary must check to make sure the individual has not been a member in the past whose membership was revoked.
- In order to become a member, every patient applicant must present his or her physician's recommendation for the use of medical cannabis, regardless of whether the applicant possesses a medical cannabis ID card issued by the State of California. (This is more than a compliance issue: because NorStar Pharmaceuticals focus in on providing health-focused patient-centered care, it is important that the first document in every patient's file be his or her doctor's recommendation so that we can take any specific information given by the doctor into consideration in recommending treatment options.) The presented document must be an original, not a copy. The validity of the physician's license to practice medicine in the state of California is verified. The physician is then contacted, and the recommendation is verified.
- If the patient applicant does not have a California State Medical Cannabis ID Card or a City of Oakland Medical Cannabis Patient ID Card, the individual will have to present the physician's recommendation at the time of each subsequent visit, and it will be matched against the copy on file.

- If the prospective patient presents a California State Medical Cannabis ID Card the validity of the card is checked electronically or by phone. Subsequently, the member will not have to re-present his or her physician's recommendation at the time of each visit as long as he or she presents the medical cannabis ID card and it is found to be valid by the verification system.
- If the prospective member is a primary caregiver, the individual must present a Primary Caregiver Designation Agreement and Disclosure Form, signed and executed by the designating patient and designated caregiver, naming the prospective member as the patient's caregiver. The presented document must be an original, not a copy. The prospective member must also present a copy of the patient's physician recommendation. The patient is contacted to verify the validity of the agreement. The verification of the physician recommendation is the same as above.
- If the caregiver applicant does not have a State or City medical cannabis ID card, he or she must present the original caregiver agreement and a copy of the patient's recommendation at each subsequent visit, and they will be matched against the copies on file.
- If the caregiver applicant presents a California State Medical Cannabis ID Card the validity of the card is checked electronically or by phone. Subsequently, the caregiver member will not have to re-present the Caregiver Agreement or physician's recommendation at the time of each visit as long as he or she presents the medical cannabis ID card and it is found to be valid by the verification system.
- If all verifications are in order, the applicant is eligible to be enrolled as a member in our dispensary collective. The patient must still complete compliance paperwork and agree to membership rules before becoming a duly enrolled member.

Paperwork Compliance.

Compliance consists in the *Membership Agreement*. The prospective patient/caregiver member must read or have read to him/her all the compliance paperwork. He/she must attest in writing (by their signature) that they

- have received the paperwork,
- have read it or had it read to them,
- understand it, and

- agree to abide by all its rules and requirements.

See Exhibit, Membership Rules and Agreement Sample.

Membership Tracking.

We plan to track our memberships. For every day, month, quarter, and year, we will track the total number of members, the number of members who visit the dispensary, the number of their visits, and the number, quantity, and type of products sold and on hand for sale, as well as the number of plants or products under cultivation or production. This will allow us to ensure and document for the purposes of regulatory compliance the aggregate amount of medical cannabis and Adult Use cannabis in our facility does not exceed allowable cannabis limits.

We also will keep accurate records of all transactions, whether cash or otherwise, as well as of all member's contributions.

Finally, we will track member's monthly cumulative buy amounts to ensure that patients do not exceed the amounts recommended by their physicians and to monitor for patterns suggestive of diversion or abuse. We estimate the average patient's legitimate monthly use to be approximately 1 oz. Buy amounts frequently or significantly exceeding this will be reviewed by staff.

All books, records, and accounts, including those related to membership, will be maintained to comply with applicable laws and regulations.

D. Tax Compliance and Accounting

NorStar Pharmaceuticals will comply with local, state, and federal tax requirements. We are well aware of the unique federal tax implications for medical cannabis businesses and have consulted with appropriate professionals to ensure full compliance with the Internal Revenue Service's treatment of medical marijuana. We understand that for any drug that is considered illegal by the Federal government, including medical marijuana (albeit legal according to the State of California, a 1982 tax code prohibits cost deductions for our business. The IRS does allow for cost of goods sold deductions, however; therefore, our financial projections apply federal income tax to our projected gross profit, or gross sales less cost of goods sold.

Since we have no plans to take deductions for rent, payroll, health insurance, worker's compensation insurance, or the many other expenses that are standard deductions for

other industries, we do not expect to encounter the problems currently besetting other medical marijuana dispensaries.

See Exhibit - Financial Performance

E. Insurance

Upon granting of the dispensary permit NorStar Pharmaceuticals will obtain the required commitments necessary for insurance coverage, including general aggregate, products complete operations, personal and advertising injury, per occurrence, and medical payment coverage.

PRODUCTS AND SERVICES

F. Products

3. Dried Cannabis: Sativa, Indica, & Hybrids

The effectiveness of cannabis is directly related to strain selection and therefore we will recommend care be taken in selecting appropriate strains to meet patient needs. Patients will be encouraged to use vaporizers or ingest cannabis medicine to reduce any potential risks from smoking.

Finished, dried, manicured, cured medical cannabis will be sold in small increments. NorStar Pharmaceuticals plans to begin with 25-50 medicinal varieties of cannabis.

4. Edibles

NorStar Pharmaceuticals plans to offer several different edible product lines to cater to the various medical, nutritional, financial and taste needs of patients. Infusing cannabis into foods is a long-practiced and very effective method to use cannabis as medicine. Careful dosing is important. Edibles can be used as effectively as smoking or vaporizing. Special attention will be given to edibles with micro doses of cannabinoid content.

a. Concentrates

This line will ensure patients have a variety of consumption methods that suit each person's needs and lifestyle. Our line is designed to provide high levels of cannabinoids and THC in a readily accessible form which provides instant relief for serious conditions. This line will be produced to create pure, clean, unadulterated extractions.

Medicinals

This line is designed to conveniently access the palliative as well as curative properties of cannabis. Each different delivery method of ingestion is targeted to treat specific diseases; for example, capsules and tonics have the potency to provide curative treatment, while the Oral Spray and Chewing Gum are designed for immediate palliative treatment of pain or spasticity.

Topicals

This line is designed to provide topical applications of cannabis for arthritic patients, or patients with injuries. Topicals have an analgesic and anti-inflammatory effect to reduce or eliminate pain.

Tinctures

Tinctures are not new. Tinctures are plant extractions of whole cannabis (usually the flowers and trim leaves). This line is designed to make dose control easy for patients, with rapid absorption and effect. Tinctures can be flavored for better taste.

Services

We will offer all a full range of supportive services for our target customers and patients. At the time we open our doors, we believe that these services will be most important to the wellness and needs of our medical cannabis patients:

- Classes on medical cannabis compliance,
- Classes on pain management, wellness strategies, and oncology issues,
- Condition-based support groups (e.g., women's cancer support group, chronic pain support, HIV/AIDS support group),
- Counseling services focusing on proper medication practices and avoiding substance misuse,
- Educational seminar/support group for those new to medical cannabis,

- Horticulture classes and programs on growing your own medicine (including organic and solar), and on making edibles,
- Individual counseling,
- Medication interaction counseling,
- Nutrition and diet counseling,
- Nutrition classes,
- Resource services (referrals for a wide variety of essential life, social and economic services),
- A library providing patient information on medical cannabis, holistic healing, legality issues, and advocacy/activism, and
- Select workshops.

All these services will be available to members, free of charge. Their retention will depend on continuing demand and what we learn through our Community Needs Assessment, as discussed below. Additional services, including one or more of those set forth in the list of potential expansion services may be added based upon patient and community feedback.

Patient education will be taking place in the context of virtually every service we offer. As part of our education and counseling, we will offer a library that will include information on general holistic healing, cannabis use, and research. Understanding that patients will have different education levels and reading skills, we plan to offer our material in a variety of formats, including DVD, video, online, and tape formats.

We also plan to offer directly and through partner collaborations patient advocate or licensed clinical social work services. We will have a full-time staffing position dedicated to:

- Providing one-on-one patient counseling,
- Managing our referral network to ensure that we have working and trusted alliances with a wide variety of other patient groups and healthcare providers, and
- Working with other team members to set up and oversee our slate of member-to member activities.

Support (“Enabling”) Services

To remove barriers to access for certain populations, we plan to offer the following service:

- *Interpreters*- Providing free interpreters to patient members who do not speak English is imperative if we are to fulfill even our basic mission of providing patient-centered care to underserved populations. *Advocate Referrals* - Critical to enabling access to health care will be providing patients with expert assistance in locating providers and getting necessary referrals. This service will be offered by our center to all patients free of charge.

We plan to scale additional enabling services based on input from the community.

Substance Abuse and Misuse Counseling

We recognize the need to provide a safe environment that helps patients avoid substance abuse and misuse. Our employee members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependency, and withdrawal. In our workshops, clinics, and materials, we will emphasize personal responsibility for individual behavior. We also will provide information about the differing strengths of medical cannabis strains and products and the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, non-prescription drugs, and supplements. Each patient and caregiver will receive a list of substance treatment facilities and counselors located within 50 miles of the dispensary. Finally, working with our member managers, patient education about the potential abuse of medical cannabis will be integrated in all patient visits, materials, and outreach.

THE MARKET

The medical cannabis market is a \$1.7 billion market, according to *See Change Strategy for the American Cannabis Research Institute* and *Deal Flow Media*, a financial research firm specializing in unusual assets. Despite several recent regulatory setbacks, the market is estimated to grow fivefold, researchers say, as the list of states adopting medical cannabis laws grows. According to the firm, nearly 25 million Americans are potentially eligible to use medical cannabis based on their diagnoses, but fewer than 800,000 currently do.

Medical marijuana sales in California totaled approximately \$1.8 billion in 2016, and it's on track to grow to \$1.9 billion by the end of 2017. New patient growth has been trending at a 2 to 3 percent annual increase, and NorStar is ideally situated in the Bay Area. Cannabis use in this area is higher than average, with more than 15 percent of people reporting they regularly use marijuana. This is double the national average, which is no surprise given the long-standing medical marijuana laws.

In 2016, California voters passed Proposition 64, which legalized and regulated adult use of marijuana in the state. This law will also be implemented in January 2018, and NorStar is well-

situated in Santa Rosa where the city's decision makers have indicated they will allow adult-use retail dispensaries. Using Colorado and Washington as the model, along with data aggregated from sales at 100 California retail locations in 2017, NorStar predicts that the adult-use market will total more than \$500 million in sales in its first year, with medical marijuana sales reaching over \$2 billion simultaneously. NorStar predicts strong sales in both markets onward. The medical marijuana market will fall in 2019 down to approximately \$1.8 billion statewide, while the adult-use market will gain ground fast with up to \$2.2 billion in its second year. By 2020, combined sales of medical marijuana and adult-use products should be around \$5 billion in California, and trend even higher at an estimated \$6 billion in sales statewide in 2021.

According to BDS Analytics, sales from March 2017 to March 2018 were in excess of \$2.7 Billion.

NorStar Pharmaceuticals will apply to serve both medical and adult cannabis users and has every expectation of being successful in doing so. NorStar stands out from the crowd, with multiple differentiators driving it to success. It is the *only* dispensary in the North Bay with an Oaksterdam University Cannabis business instructor on staff, Mr. Dave McCullick. Mr. McCullick created the curriculum for and teaches the advanced business classes on Dispensary Management, Dispensary Operations, Procurement and Allocation, and Customer service for Budtenders at OU. Mr. McCullick also created the initial curriculum for the Cannabis Training University and the Florida Medical Marijuana Training Institute. Mr. McCullick was the founder and Executive Director of D&M Compassion Center in Clearlake, CA. from 2005 – 2008 and an original founder and Vice President of Sonoma Patient Group in Santa Rosa from 2008 – 2016. NorStar Pharmaceuticals goal is to become Santa Rosa's number one dispensary, and with Mr. McCullick's experience and guidance, and the team he is putting together this goal will be met with alacrity.

Because Santa Rosa is a tourist destination, we anticipate drawing patients from Mendocino, Napa, Lake, Marin and Sonoma County and the greater Bay Area. Just outside the city limits on Santa Rosa Avenue are currently two dispensaries that opened several years ago in response to Santa Rosa limiting the number of issued dispensary permits. NorStar Pharmaceuticals location will allow the City to bring back retail spending and tax revenues that it lost to these other localities.

OPERATIONS

G. Patient Care

1. *Orientation*

All new members must attend a group orientation where basic critical information is reviewed. This will include legal information such as:

- Where and when patients may legally use cannabis, with special attention paid to situations where it is expressly illegal regardless of medical cannabis qualifying status and situations where legality may be ambiguous and subject to conflicting interpretation, and
- What to do if stopped by law enforcement for possession or use of cannabis.

It will also cover medical and safety issues:

- Basic types of cannabis and their various benefits and effects,
- Safe and proper use of cannabis,
- Side-effects and drug interactions, and
- Keeping medication away from children and preventing diversion.

2. Patient Handbook

Each new member patient will receive a Patient Handbook. The new Patient Handbook will include:

- Patient Guidelines to Stay Safe and Healthy
- Patients' Rights
- Medical cannabis Law Overview
- Services
- Guide to Using cannabis
- Sativa vs. Indica
- Understanding Edibles
- Applications for Cannabis and Cannabinoids
- Ailment Specific Strains
- Substance Use Prevention
- References and Resources

3. Dispensary Access

Patient/Customer members (hereafter in this document "patient/customer members" shall include non-staff members of the collective who are designated primary caregivers as well as patients and customers enter the dispensary through the secure patient screening area. To proceed beyond the screening area, members

must have their membership verified by security personnel. This requires in most cases three kinds of documents:

- 1) their dispensary membership ID card,
- 2) a government-issued form of photo ID (other than a medical cannabis ID card), and
- 3) their medical cannabis eligibility documentation: either a) their State Medical Cannabis ID, b) Medical Cannabis Patient ID, or c) their physician's medical cannabis recommendation (if a patient) or their Primary Caregiver Designation Agreement and Disclosure Form, along with a copy of the designating patient's recommendation (if a caregiver).

Transactions involving cannabis will not take place without verification of the member's current status as a qualified customer, patient or caregiver and as a dispensary member in good standing. Members will not be allowed to acquire more than reasonable and medically recommended amounts.

All receipts for medical cannabis and adult use cannabis dispensed will state clearly the sales tax, any MBT as well as include a statement that any excise tax is included in the price at the time of the transaction.

4. *Patient Service*

The patient's first visit as a full member to our dispensary will involve a private consultation in which the patient's medical needs, history, and dosing practices are discussed. Detailed records will be kept. Patients will be encouraged to keep a "medication use journal" and asked to keep track of their medication use, indicating the date and time of use, the symptom they were treating, the exact product used, the amount, and the result obtained. Staff will follow up in private consultations with patients at each subsequent visit until patient expresses satisfaction that an effective regimen for his or her needs has been found. At every visit, staff will check with patients to see if they would like to use any of our free services such as care referrals and coordination, one-on-one counseling, or support groups. Staff will follow up with patients at regular intervals to ensure that they are getting the care they need.

We use space in our dispensary (outside of limited access areas) for both private patient consultations and for group meetings. The dispensary will be open seven days a week, and we will make sure that some group activities and essential consultative care services are available to patients every day of the week.

The services available to our members are described above in our discussion of services. By general category they are:

- An on-site library providing, in multiple languages and in both written and video formats, patient information on medical cannabis, holistic healing, legality issues, and cannabis advocacy/activism;
- Complementary and alternative wellness therapies, offered for free or at discounted rates applicant will subsidize the fees charged by outside providers such as acupuncturists, chiropractors, etc.);
- Free classes, workshops, and support groups;
- Free counseling, patient advocacy, and care coordination/referral to other providers and organizations; and
- Enabling services such as interpreters and needs/means-testing to qualify patients for products and services at no charge on or sliding fee scale.

5. Feedback

Applicant will solicit continual member feedback, take specific action to mitigate any member dissatisfaction, and follow up to measure the success of the mitigation actions undertaken. We will keep a log of all member complaints, of the response action taken, of the names of those assigned accountability for implementing and following up on the success of the mitigation, and of the ultimate outcome as measured against both management expectations and reevaluated member satisfaction. Mitigation will continue until management and member satisfaction is complete and documented. These records will be available for the scrutiny of state, county, and municipal oversight officials at any time. A comprehensive internal performance assessment will take place not less than annually and will, among other self-assessment methods used, review these logs *in extenso* to ensure that our dispensary is successfully employing as its standard procedure a self-correcting and improving operations model.

H. Cultivation Production

No cultivation will take place at this or any other location.

Edibles, Concentrates, and Tinctures

In addition to dried cannabis, we also plan to offer extractions. Relying only on licensed suppliers, we will offer a wide variety of edibles to patient members and it allows us to offer patients a greater variety of delivery methods and forms of cannabis.

Applicant will employ a nutritionist member who will be responsible not only for our free patient nutrition counseling service, but also for overseeing our edibles inventory and educating patients, healthcare providers, and the public about the benefits of edibles.

Edibles and concentrates will be selected that meet all relevant federal, state, and local health and safety standards for agricultural products and the manufacture of food-grade products for commercial sale.

Non-Diversion: Inventory Control

Our goal is a process that tracks and secures each individual cannabis product through the entire process, that is, from the seed to sale.

The supply chain tracking begins upon receipt of all cannabis goods.

All of a products information is entered into a software system that tracks the product so at any given time, we are able to know how many products and what distributor and supplier they came from.

Information that our supply chain tracking system is able to retrieve includes but is not limited to; supplier of origin, distributor info and Transporter info.

Just like fine wine, our cannabis will be *appellation d'origine controlee*, with detailed and verifiable information as to provenance, variety, purity, and strength.

Patient health is a high priority of applicant. Since our bar-coding system allows us to track the origins of each product so that we know the production history of the batch (any problems that arose during production and the remedies used) as well as the origin of the product(s) in question. This data gives us extraordinary power to control quality through targeted monitoring. We can determine if problems (or benefits) are related to production or cultivation conditions or genetics, allowing us to improve supplier cultivation techniques and to use selective breeding to produce varieties with highly specific clinical applications or with properties that are desirable from a cultivation perspective, such as disease resistance or high yield.

Once we are fully operational, our supply chain tracking system allows us to give our patients more information about their medicine than they have ever received before.

Regular Inventories will reconcile automated records with actual holdings. This enables us to prevent significant diversion by promptly identifying any unaccounted inventory shrinkage.

Labeling

- The Labeling will be compliant with current applicable state and local regulation. The final label on all cannabis products dispensed to patient members will clearly bear, as the minimum, the following information:
- Name of the cannabis variety or strain
- The amount (weight) of product and form
- Cannabinoid profile (absolute quantities of each active ingredient per unit) including THC levels
- Date packaged or expiration date of product
- Product safety testing results for all categories of possible contaminants (pesticides, mold, yeast, bacteria, heavy metals)
- Source of product

Labels will also bear the following warnings and precautions:

- Use only as needed.
- Do not use when driving or handling heavy equipment.
- Do not use in conjunction with alcohol or other medications.
- WARNING: This product contains chemicals, including cannabis, known to cause cancer and birth defects or other reproductive harm.
- KEEP OUT OF REACH OF CHILDREN!

Finally, all customers, patients and caregivers will be informed of the following legal disclosures:

- This product may only be possessed by a member of NorStar Pharmaceuticals in good standing. It may not be transferred to any person who is not a NorStar Pharmaceuticals member under any circumstances.
- This product may not be possessed, transported, or used outside of the state of California.

- This product may only be consumed by qualified patients as defined under California Health and Safety Code 11362.7 or adult users 21 and over.
- Under federal law, the manufacture, distribution, or possession of marijuana is a criminal offense. While the California Attorney General's Office recommends individuals involved with the manufacture, distribution, or possession of medical marijuana not be arrested, there are no guarantees regarding the effect of federal law on people who possess or use this product.
- The possession or use of this product carries with it an inherent risk of negative health consequences, criminal prosecution, and other possible risks. Neither NorStar Pharmaceuticals nor its members can be held responsible for any damages or injury that may result from the use or possession of this product, except in the case of gross negligence or intentional misconduct.

Patient/Customer Recordkeeping

The dispensary will track when members' recommendations or IDs expire to avoid providing cannabis to ineligible patients. Finally, we will track member's monthly cumulative buy amounts to ensure that patients do not exceed the amounts recommended by their physicians and to monitor for patterns suggestive of diversion or abuse. Our software system will identify unusual purchasing levels that may suggest diversion. Adult Use customers purchases will also be closely monitored and tracked.

Only authorized staff and dispensary Directors will have access to patient records, which will be kept electronically in a secure on-site database and subject to the same level of security and confidentiality as other types of health information in traditional medical settings.

To the extent required by law, patient record-keeping will be fully HIPAA-compliant. Adult Use customers are not protected by HIPPA but will receive the same protections.

Reporting

As required by the Department, the dispensary will, make available to reporting authorities all required and applicable reports and track and trace information.

Safety

1. *Patient/Customer Safety*

The safety of our patients/customers and their information is important to us. Other than security guards, only members will be allowed in our facility. No one can gain access to the facility without passing through a secure screening area. This access point is secured by our security guards. The interior patient area is monitored on video surveillance by security personnel for any disturbances. Patient information is kept encrypted on a secure, password-protected database that only authorized staff can access and never directly associated with patients' names.

2. *Product Safety*

The purpose of product safety protocols is to ensure that our medical cannabis is

- Free of pests and microbiological contaminants, toxins, pesticides and non-organic nutrient residues,
- Medicinally potent, and
- Properly labeled to strength of active ingredients.

Secondly, we monitor for the failure of our preventive measures and the need for remediation through close observation of current conditions and continual laboratory analysis of samples.

Finally, when necessary, we undertake remediation, always employing the most organic and least toxic best practice method that will be effective for the purpose.

BUILDING AND CONSTRUCTION PLAN

The plans for conversion and upgrade of the existing facility keep several goals in mind.:

- Complying with all code requirements,
- Meeting and exceeding safety and efficiency standards specific to the type of operations proposed, and
- No operations until after final city inspections and approval

The facility is designed to maximize the safety of our patients, employees, and neighbors, as well as the safety and security of our products. The design incorporates the most environmentally friendly materials and the latest technologies, enabling us to conserve energy and lessen our carbon footprint while optimizing the conditions for a healthy facility.

SECURITY PLAN

Patient/customer, worker, and neighborhood security are our highest priority. As discussed more fully in our attached Security Plan, we have developed a state-of-the-art plan that takes advantage of the security industry's best practices and most up-to-date technology, ensuring that our dispensary facility operates at the highest level of legal compliance and security preparedness.

The security of our site and proposed facility has been proven in several cities across California including Oakland where our Executive Director/Chief Operations Officer served as General Manager and wrote this Security Plan approved by Oakland. Our ED/COO was also a founding member of Sonoma Patient Group in Santa Rosa from 2008 until 2016 utilizing the same security protocols.

Our Security Plan has the preventive measures adopted that will minimize our security exposure, protecting the public, our patients, and our staff. We also are confident that should there be any breach of security, our comprehensive response capabilities will ensure the incident is quickly detected, contained, and resolved at the appropriate response level.

Facility Security

The key to facility security is controlling ingress into and movement within the building a) through strict access protocols for employees and patients and b) through physical and electronic safeguards to protect against forced or surreptitious entry or movement.

This includes:

- Securing the perimeter of the lot with security patrols,
- Securing all doors and windows with locks and electronic alarm mechanisms,

- Adequate lighting and video surveillance with third-party monitoring in and around the facility,
- Round-the-clock security monitoring the facility,
- Multiple redundant electronic systems to detect intrusion or unauthorized movement within the facility,
- Controlled access points in employees-only areas,
- Strict enforcement of identification requirements for all incoming persons ,
- A secure pre-screening and reception area for incoming patients, and
- Strict enforcement of eligibility documentation and verification procedures for all patients.

Operations Security

The key elements of operational security are: procedural security, workforce security, and inventory security:

- Procedural security requires explicit and well-rehearsed protocols to deal with all types of incidents and eventualities, from suspicious behavior, loitering, or on-site consumption to full-blown emergencies and premeditated security threats. Well-laid plans, working security systems, and staff preparedness are paramount.
- Workforce security includes background checks, proper training and drills, and physical and electronic safeguards for employee safety during transactions.
- Inventory security requires a system for strict inventory tracking and control along with facility monitoring to prevent diversion, theft, and on-site consumption.

As reflected in our attached Security Plan, preventing minor incidents of misconduct and responding to them appropriately when they do occur is an important strategy to reducing the likelihood of major security breaches.

See Attachment X, Security Plan

FIRE PLAN

To make sure we develop a fire protection plan adequate in all of the occupancy categories relevant to a medical cannabis dispensary, we will partner with the Santa Rosa Fire Dept. to evaluate our building and approve our comprehensive fire plan.

Fire Plan Overview

1. *Preventive Safety Measures*

a. Areas of the Dispensary

Critical components of fire prevention in a dispensary facility that includes cannabis cultivation are:

- Complying with State and Local Fire Codes
- Going Beyond Code Requirements
- Ensuring Electrical Safety
- Good Housekeeping and Site Maintenance
- Adequate Signs and Notification for Hazardous Materials
- Fire Safety Training and Drills
- Effective Emergency Response Plans
- Certified fire extinguishers

b. Patient/customer Service Areas of the Dispensary

In addition to the above, further fire safety measures must be adopted in the dispensary areas that will be frequented by patient members:

- Promulgation of a strict no-smoking policy and other fire prevention rules to all members;
- Clearly marked and illuminated exits and evacuation routes; and
- A dispensary staff trained and routinely drilled in the proper procedures to evacuate members.

2. *Fire Suppression*

Applicant will employ many techniques to mitigate and control fires if they occur. Smart mitigation techniques limit fire damage and danger, and they conserve the resources of the Santa Rosa Fire Department by reducing the number of incidents that require response by firefighters. These mitigation techniques include the following:

- Fire Alarms
- Sprinklers
- Extinguishers
- Monitoring Services
- Fire Evacuation Plan

COMMUNITY ENGAGEMENT

Outreach

Applicant is committed to strong public engagement and outreach to the community. Our community outreach has three goals: (i) to establish a process by which the community can express itself regarding the project; (ii) to inform the community about medical cannabis issues; and (iii) to ensure that our approach genuinely reflects the community's needs. To reach our goals, we anticipate doing one or more of the following, depending on input at various stages of the project:

- Identifying a broad cross-section of community-based organizations and community leaders, including those representing indigent and traditionally underserved and underrepresented residents, to learn how residents and stakeholders can best receive useful information that enables them to participate meaningfully.
- Identifying and visiting civic, senior, and veteran organizations, health care support groups, and community meetings to introduce our nonprofit organization, our mission, and our vision for the patient care center. We believe this type of outreach establishes our legitimacy with the community and our vested interest in its welfare. We will listen receptively and respond to any concerns about the project.
- Holding or participating in advisory council meetings to introduce applicant and present the project to any parties with similar goals. Again, our purpose would be to listen and find ways to be responsive. Completing our outreach efforts with a follow-up letter to community stakeholders, letting them know that we heard their concerns and what procedures we will follow in responding to such concerns.

We are committed to engaging our patient and residential communities on an ongoing basis. We will partner with local community organizations to solicit volunteers for these positions.

We can create public awareness of our dispensary and attract new members through our community outreach and education programs. By offering free workshops and

seminars to potential patients and other healthcare providers on topics related to medical cannabis and the conditions for which it is typically recommended, as well as on legal issues surrounding medical cannabis, we make the existence of our organization known and attract members by positioning ourselves in the public mind as ambassadors of a socially responsible provider.

1. *Developing Provider Alliances*

An important element of NorStar Pharmaceuticals patient-centered approach is the help we will offer patient members in finding providers and services to handle other aspects of their care and in coordinating their care across their many different providers. To be able to do this, we must first build alliances with these other providers and organizations. However, alliances are two-way streets and will result in our getting referrals from them as well. A key part of this outreach initiative will be educating alliance partners on the benefits and legalities of medical cannabis, and on the processes involved in referring people for medical cannabis use. Hosting educational forums for other providers will therefore be a critical element in our business approach. Building strong alliances with other health care providers, community health clinics, hospices, community service organization, patient advocacy groups, support groups, AIDS organizations, senior homes, and referral networks will create a strong and lasting source of patient referrals. At the same time, it will give us greater resources to fulfill our own patient-centered mission, which includes helping patients find appropriate providers for services we do not offer and helping them coordinate their care across providers. Being known in the patient community as a wellness center with especially strong networking and referral resources will itself be a draw to patients with complex medical conditions.

2. *Industry Leadership and Sponsorships*

We will keep our corporate “brand” visible through sponsorships of community and industry causes and through industry activism that reflects our community-focused public health agenda and its emphasis on compassion and social justice.

3. *Public Relations*

Carefully managed messaging and coverage in local media can be a very effective means to create public awareness.

4. *Word of Mouth*

In the medical cannabis industry, satisfied members and their word of mouth is perhaps the most powerful generator of a growing membership. Many dispensaries report that “friend” is the most common answer reported on new patient intake forms when patients are asked to indicate how they heard about a dispensary. We do not intend to enlist patients to recruit new members or to offer any special incentives to do this. We will not need to. The high quality of supportive patient-centered care we offer as part of our basic mission will be incentive enough. We intend to operate as a “community center” for those suffering from serious medical conditions— what the literature on patient-centered care sometimes refers to as a “medical home-away-from-home” where patients can interact supportively with one another. Since non-members legally cannot be allowed in our facility, patients who appreciate this aspect of our services will naturally recommend membership to those of their friends who are also qualified medical cannabis patients.

Community and Economic Development

Santa Rosa has shown great interest in revitalization and community development plans that correct systemic inequities and benefit blighted areas and disadvantaged populations. This brings us to a crucial component of our implementation strategy, which is an aggressive outreach and community benefits program. Some monies collected in excess of operating and recapitalization costs will be dedicated to funding this larger charitable mission, which has three components:

- Giving indigent and low-income patients full access to our products and wellness/support services,
- Removing other barriers to access through enabling services (providing transportation, interpreters, and referral to other access-enabling services), and
- A Community Benefits Plan.

1. *Commitment to Local Hiring and Spending*

We are committed to making our project a source of economic stimulus for Santa Rosa and California. From initial opening of the facility to the implementation of our community development initiatives, we intend to contract, buy, and hire locally, taking advantage of local recruitment resources to offer employment to displaced local workers who are willing to be retrained.

We believe that Phase I day-to-day operations will add approximately 14 full-time employment opportunities to Santa Rosa’s economy. The dispensary will contribute

directly to the revitalization of its immediate neighborhood by funneling an influx of visitors from in and around the vicinity of the dispensary, bringing incidental business to shops, restaurants, and other services in the area.

2. *Indigent/Compassion Care Program*

In order to bring patient-centered care to underserved populations and effectively address the health disparities affecting them, applicant will have to support, as a fundamental part of its charitable mission, aggressive community outreach services that overcome each of these barriers:

- Providing free patient education services in a variety of formats, media, and languages;
- Providing free or sliding-scale products and services to indigent or low-income patients;
- Hiring a diverse staff and training them to be comfortable with diversity and competent in minority patients' languages and cultures;

Finally, by building alliances with other health-related organizations, such as community health clinics, community service organizations, patient groups, and providers, we can share our strength, coordinate initiatives, and have a collective impact on public health for which we can be proud.

We anticipate that our compassion care program will require further refinement, but we are committed to making our program be the model program in the country.

3. *Community Benefits Plan*

Applicant believes that it can and should have a critical role in the delivery of medical marijuana healthcare and to that light we also believe that we have an important fiduciary obligation to be a "good neighbor" and provide benefits to our community as part of our healthcare mission. Therefore, we view our Community Benefits Plan as a blueprint for how we plan to accomplish our Mission.

In developing our Community Benefits Plan, the following core principles that will guide us:

- Applicant's Board of Directors commits to make public a Community Benefits Mission Statement, putting forth our formal commitment to provide

resources to and support the implementation of a regular Community Benefits Plan.

- Applicant will support its Community Benefits Plan at the highest level of our organization. Our Board and senior management will be responsible for overseeing the development and implementation of the Community Benefits Plan, including designating the programs or activities to be included in the plan, allocating the resources, and ensuring its regular evaluation.
- We will ensure regular involvement of the community, including that of the representatives of the targeted underserved populations, in the planning and implementation of the Community Benefits Plan.
- To develop our Mission Statement and Community Benefits Plan, we will conduct a Community Health Needs Assessment, a comprehensive review of unmet health needs of the community by analyzing community input, available public health data and an inventory of existing programs.
- We will include in our Community Benefits Plan the Target Populations we wish to support, specific programs or activities that attend to the needs identified in the Community Health Needs Assessment and, measurable short and long-term goals for each program or activity.

Applicant has plans to include in its Community Benefits Plan, a grant program. We anticipate awarding funding annually through our grant program. While we recognize that our program will require refinement, we anticipate awarding grants to organizations with a 501(c)3 status.

4. *Good Neighbor*

Applicant seeks to be an asset and a beneficial resource for the surrounding community. As a good neighbor, we will seek neighborhood and other necessary input through every phase of our operation, beginning with our neighborhood meeting.

We also believe that being a good neighbor requires that we work to improve the neighborhood. Some of the public improvements we plan to address are:

- Access Improvements
- Drainage Improvements
- Landscape Improvements
- Code Compliance

Finally, we will take all efforts to mitigate noise, odor, and pollution/waste, and will address nuisances, including limiting foot and vehicular traffic.

MANAGEMENT AND GOVERNANCE

I. Board Members

The NorStar Pharmaceuticals team is composed of successful, established community leaders, professionals, and others committed to providing qualifying patients, their caregivers, and their healthcare providers with current, scientifically accurate information about medical cannabis and to bringing the highest quality medical cannabis and patient-centered care to those who need them most. Led by Chairman of the Board, Joel Woodbury, the Board includes:

Joel Woodbury, Chairman of the Board

Mr. Woodbury graduated from High School in Ocean City, NJ in 1996. In 1998 Mr. Woodbury Graduated from the Academy of Culinary Arts at Atlantic Community College in Mays Landing, NJ.

1997 to 1999 found Mr. Woodbury working at the Lobster House as Chef in Atlantic City, NJ. And 1999 to 2001 Chef at the Sands Casino in Atlantic City. In 2001-2005 Mr. Woodbury was a Realtor at Ocean City Realty in Ocean City, NJ.

In 2005 Mr. Woodbury invented and founded Happy Chief Filtration, an innovative first of its kind healthier solution for filtering cannabis smoke.

In 2007 Mr. Woodbury founded NorStar Genetics, a cannabis breeding and genetics company dedicated to crafting the finest cannabis strains through extensive testing, research and elite strain acquisition while promoting safe and environmentally friendly cultivation methods for the legal cannabis market.

Dave McCullick, Executive Director/Chief Operations Officer

Mr. McCullick has been a cannabis activist and canna-business owner for more than 13 years. A US Navy Veteran, Mr. McCullick opened his first dispensary, D&M Compassion Center in 2005 in Clearlake, California. Mr. McCullick sponsored lake County's first medical cannabis cup in 2006. Mr. McCullick separated from D&M Compassion Center and opened his second dispensary, Sonoma Patient Group, in Santa Rosa in 2008.

Mr. McCullick spent 2008 to 2016 as the Vice President and Chief Purchasing Agent for Sonoma Patient Group. Before leaving Sonoma Patient Group he trained their current Chief Purchasing Agent.

Mr. McCullick has spent the last 9 years teaching at Oaksterdam University and created the curriculum for and teaches Safe Procurement and Allocation, Patient Relations and Customer Service, as well as Dispensary and Cannabusiness Management and Operations, all with an emphasis on regulatory compliance. Mr. McCullick also taught for, and created the initial curriculum, for the Cannabis Training University and the Florida Medical Marijuana Training Institute.

Mr. McCullick has also written for many trade industry magazines such as West Coast Cannabis, Treating Yourself Magazine and Alternet.org. Mr. McCullick also co-authored the Idiot's Guide to 'Starting and running a Marijuana Business' with Debby Goldsberry in 2017, writing 15 of 22 chapters.

Additionally, he has spent much of his career working with cities and counties in California and across the United States developing sensible cannabis regulations at the local level. He also serves as a consultant to assist businesses in the cannabis permitting application process and provides compliance training to dispensaries and other licensed cannabusiness's that have obtained state licenses.

Mr. McCullick served as Chief operations officer for Aquarius Cannabis and spent 14 months as the General Manager of Magnolia Wellness in Oakland, California. While serving as the GM at Magnolia Wellness he assisted in obtaining the first East Bay on-site consumption permit in the City of Oakland as well as worked to get the first ever outdoor cannabis farmers market approved and licensed in Oakland.

Mr. McCullick is currently working back at Magnolia Wellness consulting and working as a compliance officer training the staff on the new rules and regulations that took effect this year and writing Magnolia's new SOP's and is in-charge of getting their new Consumption Lounge remodeled.

Mr. McCullick was recently asked to work as a court appointed cannabis expert writing reports and interviewing defendants and prosecutors and testifying in court on cannabis yields, values and dosages for California municipal jurisdictions. Different courts and attorneys have cases that require cannabis expert testimony to determine strategy for prosecution and defense in pending and future cases.

Mr. McCullick's years of industry experience and business acumen will ensure that NorStar Pharmaceuticals will be always in compliance with state and local regulations and that our customers have access to the most recent and highest quality cannabis and cannabis products.

Jennifer Woodbury, Chief Financial Officer/General Manager

Mrs. Woodbury graduated from Ocean city High School in Ocean City, NJ in 1992. Mrs. Woodbury received a Bachelor of Science Degree in accounting from La Salle University in Philadelphia, PA. 1997 found her graduating from South Philadelphia Beauty Academy and became a licensed cosmetologist in PA. She has subsequently been licensed as a cosmetologist in Ca. and NJ.

In 2003 Mrs. Woodbury worked for and became a licensed realtor in NJ. Mrs. Woodbury worked for Accurate Income Tax in PA. and has worked as a cosmetologist and hair stylist. Mrs. Woodbury is the General Manager of Happy Chief, LLC a company that sells filtration systems for pipes and bongs used by cannabis consumers.

Mrs. Woodbury is currently also managing investment properties for Bay Beginnings, LLC.

Mrs. Woodbury served as the GM and CFO of NorStar Genetics, a cannabis genetics seed breeder from 2012 until the end of 2017. Mrs. Woodbury's experience in breeding and genetic selection, coupled with Mr. McCullick experience as long time purchasing agent, will prove an invaluable asset assuring our customers a product range rivaled by no other.

Mrs. Woodbury's experience as an accountant will ensure timely collection, payment and reporting of all monies and taxes collected.

J. Employee Members and Training

Applicant will start with 14 full-time employee members.

Qualified members will have a minimum of 40 hours of training upon hiring and work for three-months on probationary status. During this period, they will participate in a rigorous training process and be evaluated for suitability in a restricted-access medical

environment and for their ability to adapt to the needs of our patient-centered approach to healthcare. Training will include the member work handbook, other reading materials, presentations by qualified professionals, and hands-on training. The program will consist of one or more of the following modules:

- *Compliance.* Compliance training will cover all municipal, state, and federal laws and requirements relating to cannabis. Obligations of licensed cannabis collectives will be emphasized. Other topics may include the rules and regulations of the dispensary, sexual harassment training, effective interaction with law enforcement personnel, and the rights and responsibilities of medical cannabis patients. The training will include at least one two-hour session with a licensed, subject-matter expert attorney who is a practicing member of the state bar.
- *Medical.* Medical training will include disabled rights and sensitivity, how to identify and interact with a patient having a medical emergency, the proper uses and benefits of medical cannabis, and an introduction to the other medical treatments offered by our wellness program.
- *Dispensing.* As noted before, staff will be trained in patient care as well as Adult Use retail sales. The focus will be on assisting customers in making appropriate decisions about how to choose the type of medicine which is right for them. Staff will be provided with ongoing training in product information as well as general service philosophy.
- *Safety.* In addition to its focus on safety, security training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery and active shooter response techniques, conflict resolution techniques, and diversion detection techniques.
- *Patient-Centered Care.* Because of our focus on patient-centered care, staff training, and education will have to go beyond the standard of care in traditional settings. Staff must not only be able to answer questions about the use of medical cannabis for many different conditions, the differences between various strains and the benefits of other complementary therapies, but they must also be able to do this in a patient-centered way, which means having the pedagogical, socio-cultural, and linguistic competencies needed to communicate effectively with patients regardless of their level of health literacy, education, language, or socio-cultural background.

GREEN PRACTICES

Applicant aims to become an industry role-model for initiative and innovation in green cultivation and environmentally-responsible business development. Because of their disproportionate energy use, we believe that dispensaries have a responsibility to be as green as possible.

As part of our green model, Applicant plans to obtain:

“Clean Green Certification” for Cultivation Products, and Compliance

The Clean Green Certified program is comprised of three parts: legal compliance, a review of the manner-in-which the medicine is grown to teach patients. Taken together, the program helps to insure our legal compliance as well as to distinguish our products from others available to qualified patients. A certified operation is licensed to use the Clean Green Certified label on their products. It is an annual review requiring an on-site inspection once a year as well. We will seek products from Clean Green Certified suppliers. While applicant is not operating a cultivation facility we intend to seek Clean Green Certified flower suppliers.

Green Business Certification

The certification recognizes businesses and government agencies that operate in an environmentally responsible way. The County provides assistance to help businesses comply with environmental regulations, and then to go beyond compliance to conserve energy, water, and other resources, and to reduce pollution and waste.

Furthermore, we will develop a comprehensive plan to ensure that our operations will be exceptionally responsible in the following areas of environmental concern:

- Management of storm water runoff,
- Energy use,
- Disposal of trash and debris,
- Management of waste,
- Handling of hazardous materials, and

Finally, as part of our research and development budget, we intend to work with energy efficiency, renewable energy, and carbon markets to invest in advanced green growing technology, equipment supplies, and operating standards. We intend to make the drive

towards “100 percent green and clean” a signature element of our “brand” and a centerpiece of our industry leadership.

Given that dispensaries can be financially sustainable organizations, there is simply no good reason not to invest in sustainable practices and build such practices into the costs of operation.

RESEARCH AND DEVELOPMENT

Once we are operating at capacity, we will begin dedicating a portion of monies collected for research and development, which will have three long-term-goals: improving patient care by building a clinical database, 2) improving strains through feedback on selective breeding to our suppliers, and 3) developing better green growing technologies for our customers and suppliers.

Needs of Patients

We place great emphasis on researching and developing medicines that best fit the needs of patients. We will use patient feedback forums including anonymous web-based tools, in-house surveys, patient log books, forms to rate the scale of pain, guidelines for patient self-assessment, and direct feedback documentation to assess patient satisfaction and to correlate specific benefits, reactions, and effects with patients’ medical conditions, lifestyle, and other relevant circumstances. We will use this information to build a comprehensive database that we can eventually use in helping patients pick just the right medications for their needs and condition. This will improve our clinical understanding of the benefits and side-effects of different strains, both in general and insofar as they relate to the management of specific diseases and patients with specific profiles (age, medical history, adjunctive treatments).

K. Conventions

We will also attend regular medical and medical-related cannabis conventions as a means of investigating current cultivation techniques and practices as they relate to patient care. As we develop a rich database on desirable and undesirable properties in different strains, we can begin a process of crossbreeding to selectively remove unwanted properties, reinforce others, such as increased levels of specific cannabinoids, thus creating strains with specifically designed clinical applications.

FINANCIALS

Applicant has sufficient capital in place to secure and start up the proposed facility. Such costs incorporate the City's permit fee. Applicant believes that we have more than sufficient capital to cover estimated costs of operation, compensation of employees with fringe benefits, equipment costs, utility costs, legal compliance, and O&M as needed. The funds for this project are readily available and have been set aside for our project, pending approval of our permit. Additional sums remain available, if necessary, to fund applicant's longer-term financing needs until applicant becomes self-sustaining.

After extensive review of other established facilities and established dispensary models, we have developed a comprehensive three (3) year financial Performa for the anticipated results of establishing and operating our proposed facility. Our financial Performa shows the immediate and long-term financial feasibility of our proposed plan. Specifically, our Performa demonstrates how applicant plans to maintain our status. We have given particular emphasis to the projected cash flows and opportunities for revenue redistribution through taxation, job creation, patient services and community benefits. We provide a three (3) year Performa.

See attached, NorStar Pharmaceuticals Proforma

EXHIBITS

NorStar Pharmaceuticals Membership Agreement

Please carefully read this document before initialing and signing it.

By signing this Agreement and meeting other requirements (described below),
_____ will become a member of _____, a collective
formed under the California law.

Initials

Membership qualifications

To be a member, you must meet the following requirements at all times:

- Be at least 18 years of age (21 for Adult Use)
- Be a California resident (for Medical Cannabis Purchase)
- Be one of the following:
 - A Qualified Patient – a person whose licensed physician has recommended the use of marijuana to treat an illness.
 - A Primary Caregiver for a Qualified Patient – a person who is designated by a Qualified Patient (defined above) and has consistently assumed responsibility for the housing, health, or safety of the Qualified Patient. A person may be a Primary Caregiver for more than one Qualified Patient provided that the Primary Caregiver and Qualified Patients for which he or she has responsibility all live within the same county.

IMPORTANT: By signing this Agreement, you are certifying that you meet these requirements. You understand that you must notify the collective IMMEDIATELY if at any time you no longer meet these requirements and your membership will automatically be terminated.

We require that you show us proof of California residency (Medical Cannabis Only), your valid state or city medical marijuana identification card (if you have one), and original (not a copy) doctor's recommendation (or if you are a caregiver, you must provide a letter from a Qualified Patient designating you as his or her caregiver as well as a copy of that patient's medical marijuana identification card, if he or she has one, and his or her doctor's recommendation) before you can be admitted as a member. We will track the expiration date on your card and

will remind you in advance when the expiration date approaches. You must always have a valid, non-expired card or recommendation on file to remain a member. We will verify that your doctor is currently licensed to practice medicine in California and we will contact your doctor to verify the validity of the recommendation (you will need to sign the attached release for this purpose).

IMPORTANT: If you are joining as a caregiver, and not as a patient, you understand and agree that the medicine grown by the collective is for use by Qualified Patients only.

Initials

Fees

Fees are charged for products to cover the overhead costs and operating expenses of the collective and its members.

Your membership will be automatically renewed each year unless you notify us that you wish to cancel your membership.

Product fees will be charged based on the products that you order. All applicable sales taxes and MBT's are in addition to the product fees. Excise taxes are included in product fees.

Initials

Communication

You may receive email communications from us. These communications may contain important information such as changes in rules or regulations etc. You are responsible for reading the emails we send to you and for notifying us of a change in your email address or other contact information.

Initials

Confidentiality

Management will keep all information regarding our members confidential except as otherwise required under the law.

Members are required to keep information about other members, including the fact of their membership in the collective, confidential.

Initials

No re-sale or transfer of medicine

The medicine grown by the members of the collective is grown only for the use of the members. No member may sell or transfer in any way any medicine to a non-member. Any member that does this will be immediately terminated. Members may gift legal amounts of cannabis. Gifting may not take place on premises of a licensed retail cannabis facility.

Initials

Use for medical purposes only; Adult Use; federal law

By signing this Agreement, you; understand that the medicine you receive as a member of the collective is for medical purposes or Adult Use only.

You understand that under federal law, the manufacture, distribution, or possession of marijuana is a criminal offense. While the California Attorney General's Office recommends individuals involved with the manufacture, distribution, or possession of medical marijuana not be arrested, there are no guarantees regarding the effect of federal law on the collective and its members.

Initials

Termination of membership

You may cancel your membership at any time by providing written notice to the collective.

Your membership will be terminated immediately if you cease to meet the requirements for membership or violate any legal requirements governing the collective such as the requirement that medicine may not be diverted to non-members. Your membership may be terminated for other reasons.

Initials

Transferability of membership

Membership in the collective is non-transferrable.

Initials

Liability and risk

You agree to hold the collective and the other members harmless for any injury or damages resulting from events not caused by the intentional misconduct or gross negligence of the collective.

The consumption of fresh produce always carries with it an inherent risk of negative health consequences. One example of this is the aspergillus fungus which can grow on marijuana and has been known to threaten the health of persons with suppressed immune systems. If you believe you may be vulnerable to such risks, it is your responsibility to alert collective management which will work with you to identify methods for reducing your risk. You understand, however, that there is no way to completely eliminate the risk associated with consuming fresh produce and you hold the collective and the other members of the collective harmless for any damages or injury that may result from such consumption.

Initials

Governing law

This Agreement shall be governed by and construed and enforced in accordance with the internal laws of the State of California and the City of Santa Rosa.

Initials

Invalidity of provisions

In the case any one or more of the provisions contained in this Agreement is for any reason held to be invalid, illegal or unenforceable in any respect, such invalidity, illegality or unenforceability shall not affect any other provision of this Agreement and such invalid, illegal and unenforceable provision shall be reformed and construed so that it will be valid, legal, and enforceable to the maximum extent permitted by law.

Initials

No waiver

Any party's failure to enforce any provision or provisions of this Agreement shall not in any way be construed as a waiver of any such provision or provisions, nor prevent that party thereafter from enforcing each and every other provision of this Agreement. The rights granted both parties herein are cumulative and shall not constitute a waiver of any party's right to assert all other legal remedies available to it under the circumstances.

Initials

I have read and agree to all of the above.

Signed: _____

Date: _____

Name: _____

Address: _____

Email address: _____

Home phone: _____

Work phone: _____

Cell phone: _____



**NorStar Pharmaceuticals
Retail Cannabis Use Permit
Application Materials**

City of Santa Rosa

APR 17 2018

Planning & Economic
Development Department



NorStar Pharmaceuticals Management and Operations Manual

NorStar Pharmaceuticals Management and Operations Manual

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NorStar Pharmaceuticals Management and Operations Manual

Section 1: General Operations

Procedure #:	Policy Name: Local and State Compliance Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Local and State Compliance Plan

Purpose:

To ensure consistent Local and State Compliance with current cannabis regulations

Definitions:

Local = City, County/regional

Scope:

Facility Wide

Responsibilities:

Executive Director (ED) – to create and implement a policy assuring compliance always

Chief Operations Officer (COO) – to assist the Executive Director in implementing this policy

General Manager (GM) – to supervise this policy and ensure compliance

Detailed Procedures:**1. Local and State Compliance**

- a. The ED will create and implement this policy.
- b. The Executive Director (ED), with the assistance of the COO, and with supervisory oversight by the GM, will assure that the dispensary is always in compliance with State and Local regulations.

c. The ED will review state and local law quarterly to ensure continued compliance.

d. The ED will ensure any notices received by the city of Santa Rosa, County of Sonoma or the State of California regarding regulation changes are implemented immediately upon receipt including changes to building permit requirements, fire permit requirements and CUPA permit requirements.

e. The COO, with oversight and instruction from the ED, will implement any new requirement changes to state and local law(s).

f. State agencies that may propose changes to the current law could be but not limited to the following agencies; Bureau of Cannabis Control, the Department of Food and Agriculture, the Department of Public Health, the Department of Pesticide Regulation, and the California Department of Tax and Fee Administration.

Attachments:

Santa Rosa city Ordinance No. ORD-2017-025

California code of Regulations Title 16 Division 42. Bureau of Cannabis Control

Procedure #:	Policy Name: Hours of Operations	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Hours of Operations

Purpose:

To assure the dispensary is open during mandated hours to best serve our members and to not be a detriment to the surrounding area

Definitions:

None

Scope:

Facility Wide

Responsibilities

Executive Director (ED) – to establish and enforce hours of operation

Chief Operations Officer (COO) – to implement hours of operation

General Manager (GM) – to supervise timely opening and closing within these parameters

Security (SEC) – to secure the outside of the facility, before and after hours of operations

Detailed Procedures:

1. Maintaining proper hours of operation

a. The ED, COO and GM are responsible for enforcing hours of operation for the facility.

b. Public hours for NorStar Pharmaceuticals are 9:00 AM – 8:00 PM seven (7) days a week, Sunday through Saturday. The facility will be closed on Thanksgiving and Christmas.

c. Staff will arrive at 8:30 AM and leave at 9 PM, to manage opening and closing procedures. The PA will do their best to have deliveries scheduled made as few days per week as possible to accommodate the needs of the dispensary and the distributors for security purposes. All deliveries distributors will be through a separate entrance from that of the public.

2. Turning away people who arrive early or late

a. Once they arrive, and before evening departure, under the supervision of the GM, SEC are responsible for politely turning away any patient or caregiver who arrives either before or after the public hours of operations.

b. If patients or caregivers arrive before or after hours, the SEC should inform them that the facility is closed. As it is our goal to have the member return during normal hours, this communication should be friendly, and the SEC should verbally inform them of normal hours of operations.

c. SEC should be alert for people arriving during these closed hours, as they pose an extra security risk. If any danger is sensed, the guard should immediately retreat, use their radio to call for help, and, if warranted, push their panic button to notify the police of an emergency.

d. Patients and caregivers will be allowed to enter the parking lot and line up outside the front door 15 minutes before opening. This will keep members from circling the block, potentially creating nuisance, if they arrive a few minutes early.

3. Commercial cannabis product deliveries

a. The PA will ensure that all cannabis product deliveries are scheduled and conducted outside of normal business operating hours in accordance with state law. Deliveries can not be made or accepted using the same entrance as customers or patients during the hours of customer/patient operation.

Attachments:

None

Procedure #:	Policy Name: Display of License	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Display of License

Purpose:

To allow members to see that the dispensary is properly licensed at all times and to comply with local provisions of law

Definitions:

None

Scope:

Reception Area

Responsibilities:

Executive Director (ED) – to implement a policy assuring that this license is properly displayed at all times

Chief Operations Officer (COO) – to post all signs properly, including this license

General Manager (GM) – to supervise this policy and ensure compliance

Receptionist (REC) – to assure that all mandated signs, including this license, are posted properly, and to report any problems to their supervisor

Detailed Procedures:

1. Posting the dispensary license

a. The Executive Director (ED), with the assistance of the COO, and with supervisory oversight by the GM, will assure that the dispensary displays, at all times during business hours, the medical cannabis dispensary license issued pursuant to the laws of the city of Santa Rosa.

b. The ED will post this in a conspicuous place, so that it is readily seen by anyone entering the dispensary.

c. Under the supervision of the GM, the REC is responsible for reporting any damage, loss related to this sign to the CEO, who will immediately remedy the situation.

Attachments:

None

Procedure #:	Policy Name: Outside Signs	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Outside Signs

Purpose:

To provide clear guidance to our members and to comply with all city and County regulations regarding signage

Definitions:

None

Scope:

Outside Facility

Responsibilities:

Executive Director (ED) – to implement a policy assuring that all mandated and other signs are properly posted at all times

Chief Operations Officer (COO) – to assure that all mandated and other outside signs are posted in a visible and safe manners

General Manager (GM) – to supervise this mandate and ensure compliance

Security (SEC) – to assure that all mandated signs, including this license, are posted properly, and to report any problems to their supervisor

Detailed Procedures:

1. Mandated outside signs

a. The Executive Director (ED), with the assistance of the COO, and with supervisory oversight by the GM, will assure that the entrance to the dispensary is clearly and legibly posted with a notice indicating that persons under the age of 21 are not allowed to enter the premises, unless they are a qualified patient, or a primary caregiver and they are in the presence of their parent or guardian.

b. The ED will assure that the building entrance to a dispensary is clearly and legibly posted with a notice indicating that smoking, ingesting or consuming cannabis on the premises or, in the vicinity of the dispensary is prohibited.

c. The front door SEC has the primary responsibility for reporting any loss or damage to this sign to the ED, who will immediately carry out the repair and replacement of it, if needed.

2. Address identification sign

a. The ED will assure that the premises address identification sign complies with the City Code and with the Fire Department illuminated address signs bulletin.

3. Business identification signage

a. The ED will assure that all business identification signage is approved in accordance with the city's sign permit process and any other applicable ordinances

b. The ED will assure that any business identification signs do not contain any logos or information that identifies, advertises or lists the specific products or services offered by the dispensary.

4. No obstruction of entrances or windows

a. The ED, with supervisory oversight by the GM, will assure that no sign on the premises obstructs the entrance or the windows.

Attachments:

None

Procedure #:	Policy Name: Maintaining a Barrier Free Entrance	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintaining a Barrier Free Entrance

Purpose:

To maintain the safety of the dispensaries front entrance and emergency exits

Definitions:

None

Scope:

Facility Wide

Responsibilities:

Executive Director (ED) – to create and supervise a safety plan, which assures that all entrances and exits are in working order and are kept clear and free from debris

Chief Operations Officer (COO) – to implement this policy and to manage any repairs the doors that may be required

General Manager (GM) – to supervise and ensure compliance

Security (SEC) – to assure that all external doors are in working order and kept free of debris and to report any problems with the doors or the egress in or out to a supervisor or to the COO

Detailed Procedures:

1. Maintaining a barrier free entrance

a. The ED, with supervisory oversight by the GM, will assure that the entrance to the facility is located and maintained clear of barriers, landscaping and similar obstructions, so that it is clearly visible from public streets, sidewalks or site driveways.

b. The outside SEC is responsible for clearing any obstructions that occur, which are easily managed, or should immediately report them to the ED, who will remedy the situation, with repairs if needed.

Attachments:

None

Procedure #:	Policy Name: Nuisance Prevention	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Nuisance Prevention

Purpose:

To protect the safety of the dispensary and its surrounding neighborhood

Definitions:

None

Scope:

Facility Exterior and Surrounding Area

Responsibilities:

Executive Director (ED) – to create and supervise a nuisance prevention plan

Chief Operations Officer (COO) – to implement the nuisance prevention plan

General Manager (GM) - to make sure each staff member is trained in nuisance prevention, and to implement any membership revocations or suspensions that occur due to nuisance

Security (SEC) – to be the first defense against nuisance, observing and reporting crime, and enforcing the rules of the dispensary

Receptionist (REC) – to educate members about the building rules and about nuisance prevention in the neighborhood

Detailed Procedures:

1. Maintaining a nuisance prevention plan

a. The ED is responsible for creating, implementing, and updating nuisance prevention and reporting policies and procedures. These must take all reasonable steps to discourage and correct nuisance in parking areas, sidewalks, alleys and areas surrounding the premises and adjacent properties, during business hours and if directly related to dispensary members.

b. The ED will use this definition of nuisance, as follows: ““Nuisance” includes but is not limited to disturbances of peace, open public consumption of cannabis or alcohol, excessive pedestrian or vehicular traffic, illegal drug activity, harassment of passerby, excessive littering, excessive loitering, illegal parking, excessive loud noises, especially late at night or early in the morning hours, lewd conduct or police/sheriff detentions and arrests.”

2. Implementation of the nuisance prevention plan

a. The outside SEC, under the supervision of the GM, are primarily responsible for implementing the nuisance prevention plan. The SEC posted at the facilities parking lot must be vigilant in observing the street and nearby businesses for nuisance behaviors.

b. The SEC should also carefully observe members as they pull into the lot, park and exit the lot again. No nuisance behaviors are allowed during these times, either from the members or by any guest left waiting in the car during a visit.

c. If nuisance behavior is spotted, SEC should use their radio to report the activity to the facility senior supervisor, who will be the ED or their designee. If the nuisance is onsite, the SEC may remedy the situation by having a conversation with the patron, requesting that the activity cease. This should never be done if personal safety would be threatened in making the request. If any such fear exists, the SEC should radio the ED or their designee to call 911 immediately, or they should yell out to other outside security staff to call 911.

d. If the nuisance behavior is offsite, the ED or their designee will assist in the decision to send the SEC offsite to manage the situation with a polite conversation, or to call 911 for police assistance.

3. The GM will implement and supervise a Nuisance Prevention Training Program to train all staff on the nuisance policy.

a. The GM will train staff on the Nuisance Prevention Training Program to ensure compliance.

b. The GM will instruct the REC to educate members about the building rules and about nuisance prevention in the neighborhood.

4. Revocation of membership for nuisance violations

a. Small, non-reoccurring violations of the nuisance policy are easy to manage with verbal warnings. But, if the violation is serious, such as lewd conduct or illegal drug activity, or if it is anything requiring the assistance of the Santa Rosa PD, the membership of the person will be immediately revoked by the GM. The GM or their designee is responsible for assuring the person is stricken from the member role.

Attachments:

None

Procedure #:	Policy Name: Control of Litter, Debris, Trash, & Graffiti	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Control of Litter, Debris, Trash and Graffiti

Purpose:

To keep the dispensaries premises and the surrounding areas clean and debris free

Definitions:

None

Scope:

Facility Exterior and Surrounding Area

Responsibilities:

Executive Director (ED) – to create and supervise a litter and debris control plan

Chief Operations Officer (COO) – to implement the litter and debris control plan

General Manager (GM) – to give direction to staff in executing the litter and debris control plan

Security (SEC) – to clear any immediate debris in their work area, and to notify the facility supervisor of any clean up requirements

Receptionist (REC) – to assist the building supervisor or GM in keeping their work area and the entire facility clear of trash and debris

Cannabis Service Specialist (CSS) – to assist the building supervisor or GM in keeping their work area and the entire facility clear of trash and debris

Detailed Procedures:

1. Keeping the sidewalks clean

a. Each morning, and again at mid-day, and at any other time needed, the GM, or their designee, will assure that a dispensary staff member clears the sidewalks adjoining the premises, plus 10 feet beyond property lines along the street, of all litter and debris under the supervision of the ED.

2. Maintaining adequate external trash receptacles

a. The ED will assure that the premises, including the parking, is free of litter, debris and trash. A designated staff member, under the direction of the GM, will clean the external areas each day, again mid-day, and as needed.

b. The ED will make sure there are easy to access, external garbage cans, for the use of patrons.

c. The ED is responsible for arranging for regular garbage pick-up and for any additional garbage pickups needed, if an excess of trash or debris develops for any reason.

3. Graffiti removal

a. The ED is responsible for assuring that all graffiti is removed from the premises and parking lots under the control of the premises within 72 hours of its application.

4. Staff is responsible for keeping their work area and the entire facility clear of trash and debris.

b. The GM will to give direction to CSS and the REC in executing the litter and debris control plan

Attachments:

None

Procedure #:	Policy Name: Odor Mitigation Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Odor Mitigation Plan

Purpose:

To assure no offsite odor of cannabis occurs

Definitions:

None

Scope:

Facility Exterior and Surrounding Area

Responsibilities:

Executive Director (ED) – to create and supervise an odor control plan

Chief Operations Officer (COO) – to implement the odor control plan

Security (SEC) – to report any odor from the dispensary that occurs offsite, to the COO or facility supervisor

Detailed Procedures:

1. Implementing and maintaining an odor control system

a. The ED and COO will supervise installment and maintenance of an air treatment system to ensure that there is no off-site odor of cannabis. Air treatment system will consist of carbon filters on the exhaust of the ventilation system, ozone generators throughout the facility and air scrubbers placed in strategic locations around the facility.

b. Outside SEC and any other staff members should immediately report any odor problems to the ED or COO, who will implement upgrades to the system, to the facility, or to the internal cannabis handling processes of the dispensary to further deter odors.

c. If such upgrades require the approval of any agency of the City, the ED or COO will seek and gain such approval before implementing the new system.

Attachments:

None

Procedure #:	Policy Name: Noise Control	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Noise Control

Purpose:

To assure no loud sounds or noises

Definitions:

None

Scope:

Facility Interior, Exterior and Surrounding Area

Responsibilities:

Executive Director (ED) – to create and supervise this noise control plan

Chief Operations Officer (COO) – to implement the noise control plan

Security (SEC) – to report any noise from the dispensary that occurs offsite, to the COO or facility supervisor

Detailed Procedures:

1. Implementing and maintaining a noise control system
 - a. The ED and COO will supervise and monitor noise around the facility.
 - b. Outside SEC and any other staff members should immediately report any spikes in noise or problems to the ED or COO, who will implement upgrades to the facility to further deter and eliminate excess noise.
 - c. If such upgrades require the approval of any agency of the City, the ED or COO will seek and gain such approval before implementing the new system.
 - d. NorStar Pharmaceuticals will use no sound amplification equipment inside or outside of the facility.

e. Should sound amplification equipment be required for special operations it must be in strict compliance with Santa Rosa City Code Chapter 17-16.170 and shall not exceed 15db above the ambient base level and not within 200 feet of churches, schools or hospitals.

Attachments:

Santa Rosa City Code 17-16.170

Procedure #:	Policy Name: Consumption Restrictions	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Consumption Restrictions

Purpose:

To assure that cannabis is not consumed on the premises by any member of the public.

Definitions:

ADA – Americans with Disabilities Act

Scope:

Facility Wide and other surroundings within 200 feet of the dispensaries entrance

Responsibilities:

Executive Director (ED) – to create, implement and supervise this policy

Chief Operations Officer (COO) – to implement the cannabis consumption policy

General Manager (GM) – to train staff on this policy

Receptionist (REC) – to educate members about this policy and immediately report any violations to security and to their supervisor

Cannabis Service Specialist (CSS) – to enforce this policy and immediately report any violations to security and to their supervisor

Security (SEC) – to enforce this policy and immediately report any violations to security and to the facility supervisor

Detailed Procedures:

1. Creation of a policy to prevent onsite cannabis consumption on the dispensary premise by members of the public
 - a. The ED will create policies and procedures to assure that members do not consume cannabis onsite. This includes creating and implementing membership rules that revoke membership for unauthorized use and implementing a security plan to prevent unauthorized use.
 - b. The term "premises" must include the actual building, as well as any accessory structures, parking areas, or other surroundings within 200 feet of the dispensary's entrance.
2. Member training on the importance of this rule
 - a. The ED will create a member education program about the no consumption rule and will train staff to educate members about it. This will include developing a written rule, an agreement of understanding that each member will sign, and a spoken script for staff to use as a guideline when educating members about this rule.
 - b. The COO will assist the ED in implementing these rules, including supervising other staff, creating signs and other designing other means of educating members about the policy.
 - c. The REC is responsible will train every member on the importance of this rule. This will include speaking to each member about this policy, including stating that membership will be revoked for violations of this rule.
3. Staff training on the importance of this rule
 - a. The GM will create a staff education program about the no consumption rule, and will train staff on this policy.
4. Security procedures to prevent unauthorized onsite consumption
 - a. The ED will implement security policies to prevent onsite consumption. This will include having video surveillance of the property, posting guards on the property, who observe offsite behavior of members, and who are trained to speak with members who violate this rule.
 - b. CSS will report any violations to security and their supervisor.

Attachments:

none

Procedure #:	Policy Name: No Redistribution of Cannabis Medicines Allowed	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

No Redistribution of Cannabis Medicines Allowed

Purpose:

To assure the collectives members understand this rule and to implement specific policies to support this

Definitions:

None

Scope:

Facility Wide and other surroundings within 200 feet of the dispensaries entrance

Responsibilities:

Executive Director (ED) – to create and implement systems to support this policy

Chief Operations Officer (COO) – to assist the ED in implementing this policy

Purchasing Agent (PA) – to assure that all vendors understand this policy

General Manager (GM) – to train staff and to implement this policy

Receptionist (REC) – to educate members about this policy during registration and as needed

Cannabis Service Specialist (CSS) – to observe, interrupt, and report any violations of this policy

Security (SEC) – to observe, interrupt, and report any violations of this policy

Detailed Procedures:

1. Creation and implementation of a policy preventing illegal distribution of medical cannabis

a. The ED will create and implement policies to assure that dispensary operations do not result in illegal redistribution of medical cannabis, or use in any manner that violates local, State or County Codes.

b. The COO will create systems to support this policy, including creating a membership agreement that revokes membership for noncompliance, posting of signs, labeling of cannabis, and implementing a security system that includes cameras and onsite guards.

b. The COO will create a staff education and training program to implement this policy and the systems that support it, and the GM will train all staff.

2. Educating members about this policy

a. The COO will create training materials for this policy, to include flyers, spoken script and posted signs.

b. The COO and GM will work together to train all staff members about this policy, giving each person a view of the full system in place to prevent, observe and report violations of this policy.

c. The REC will be responsible for educating members, both when they register for the first time and as needed after that. During registration, the receptionist will review this policy with each member, stressing the importance of following this regulation. Each member will be given a flyer about this policy, and will sign a pledge agreeing it. Members will be educated about the fact that a single violation of this policy will result in immediate revocation of their membership.

d. The GM is responsible for posting all signs and for keeping them in pristine, readable condition. Signs about this policy will be posted in the reception area and in the dispensary.

3. Packaging all medical cannabis with a warning against redistribution.

a. The COO, with the assistance of the GM and PA, will assure that each package of medicine at NorStar Pharmaceuticals is labeled with a warning stating that it is not for redistribution.

3. Observing, interrupting, and reporting violations of this policy

a. The ED, with the assistance of the COO, will develop a comprehensive set of procedures to report violations of this policy, including creating reporting forms and systems, training staff to watch for signs of redistribution or intent to redistribute, and training staff to interrupt a violation of this policy.

b. The COO and GM will train staff, especially outside security and the CSS, to implement these policies, and they will provide tools for complete investigations into these matters, including a reporting forms, video feed footage, and trained staff and security staff observing and reporting about violations.

4. No vendors may sell cannabis to our members

a. The ED, COO, and GM will make sure all vendors are aware of this policy, and that no direct sales occur between the NorStar Pharmaceuticals suppliers and our members. Violations of this policy will result in immediate revocation of membership.

5. Maintaining good neighbor and police relations

a. The ED and COO will assure that NorStar Pharmaceuticals will maintain good neighbor relations at all times, including reaching out to neighbors and to the community at large to inform them of our policies. The ED will assure that all neighbors have contact information for our On-site Community Relations Staff Person, so that they can report any violations to them.

b. The ED and COO will assure NorStar Pharmaceuticals maintains good relationships with the Santa Rosa Police Department. It is essential that NorStar Pharmaceuticals be able to count on the Santa Rosa Police department to assist us in enforcing this law, if needed, and for the Santa Rosa Police Department to be able to depend on our systems to prevent violations.

Attachments:

None

Procedure #:	Policy Name: No Onsite Cannabis Cultivation	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

No Onsite Cannabis Cultivation

Purpose:

To assure no cannabis is cultivated at the facility

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and implement systems to support this policy

Chief Operations Officer (COO) - to assist the CEO in implementing this policy

Detailed Procedures:

1. No cultivation of cannabis onsite

a. The ED and COO will assure that no cannabis is cultivated on the premises of the dispensary

b. In the future, if NorStar Pharmaceuticals wants to cultivate onsite, the ED and COO will seek all proper local and state permits, before beginning any cultivation.

Attachments:

None

Procedure #:	Policy Name: On-site Community Relations Staff Person	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

On-site Emergency Contact Person

Purpose:

To assure the city of Santa Rosa, the dispensary neighbors, and the community at large that NorStar Pharmaceuticals Has a community relations person at the dispensary, especially so that all complaints first come directly to the dispensary.

Definitions:

None

Scope:

Facility wide and surrounding neighborhood

Responsibilities:

Executive Director (ED) – to designate a Community Relations Staff Member and to report their contact information to the City Administrator, and to act as the Community Relations Staff Member, if designated

Chief Operations Officer (COO) – to help distribute contact information for the NorStar Pharmaceuticals Community Relations Staff Member to the neighbors and community, and to act as the Community Relations Staff Member, if designated

Office Administrator (OA) – to act as the Community Relations Staff Member, if designated

Detailed Procedures:

1. Designating an Onsite Community Relations Staff Member
 - a. The ED will provide the County Administrator with the name, phone number and facsimile number of an On-site Community Relations Staff Person, to whom one could provide notice if there are operating problems associated with the dispensary. This will be the ED, COO, or the OA, as designated.
2. Notify neighbors about the Onsite Community Relations Staff Member
 - a. The ED, COO and the Onsite Community Relations Staff Member will make every good faith effort to encourage neighborhood residents to call this person to try to solve operating problems, if any, before any calls or complaints are made to the City.
 - b. The Onsite Community Relations Staff Member will visit all neighbors, within a radius to be determined by the ED and City Administrator to meet them, to inform about the dispensaries policies, and to make sure they have contact information for the Onsite Community Relations Staff Member, including their phone, fax, and email. If unable to make in person contact, information about the dispensary will be mailed to each neighbor.

Attachments:

None

Procedure #:	Policy Name: No Onsite Physicians Evaluations	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

No Onsite Physicians Evaluations

Purpose:

To meet the rules set forth by the State Medical Board

Definitions:

None

Scope:

Administrative office

Responsibilities:

Executive Director (ED) – to create, implement, and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy

Detailed Procedures:

1. No onsite medical cannabis evaluations

a. The ED and COO will assure the dispensary never has a physician on-site to evaluate patients and provide a recommendation for medical cannabis.

Attachments:

None

Procedure #:	Policy Name: Permission Needed to Increase Floor Area	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Permission Needed to Increase Floor Area

Purpose:

To make sure the City Administrator approves changes to the dispensaries floor area, and that the NorStar Farmaceuticals permit is changed to reflect any changes

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) – to assure all changes to the facility are approved and that the NorStar Farmaceuticals permit is modified to reflect them

Chief Operations Officer (COO) – to assist the CEO in planning facility changes and in seeking permits for this

Office Administrator (OA) – to assist the CEO and COO, as assigned

Detailed Procedures:

1. No changes to the facility without proper approval
 - a. The ED is responsible for assuring that the dispensary is not physically increased in size, including floor area or buildings utilized, without a prior approval from the City amending the existing dispensary license.
 - b. The COO and OA will assist the ED in securing all building and other permits, including securing professional services, like architects and building contractors, to perform any work to code.

Attachments:

None

Procedure #:	Policy Name: Annual Review of Information	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Annual Review of Information

Purpose:

To assure that NorStar Pharmaceuticals meets mandated reporting requirements

Definitions:

None

Scope:

Administrative office

Responsibilities:

Executive Director (ED) – to prepare all reports required for the annual review of information

Chief Operations Officer (COO) – to assist the ED with information needed for the annual review of information

Finance Director (FD) – to assist the ED with information needed for the annual review of information

Office Administrator (OA) - to assist the ED with information needed for the annual review of information

Detailed Procedures:

1. Provision of annual reports to the review authority
 - a. The ED, with the assistance of the COO, FD, and OA, will provide information on the prior years' operations to the review authority, as required by law.
2. Updating operations based on annual review
 - a. The ED, with the assistance of the COO, FD, and OA, will adjust the operations of the dispensary, as necessary to address issues that arise from the annual review or any other review by the City authorities.

Attachments: None

Procedure #:	Policy Name: Maintain a Clean, Orderly, Sanitary Facility	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintain a Clean, Orderly, Sanitary Facility

Purpose:

To ensure the health and safety of patients, staff, and neighbors by keeping a clean, orderly and sanitary facility at all times

Definitions:

None

Scope:

Facility wide and within 200 feet of the facility

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) - to implement and supervise this policy, in coordination with Security and the General Manager

Security (SEC) - to implement and supervise this policy, in coordination with COO

General Manager (GM) – to oversee day-to-day operations in keeping with this policy

All other staff members – to keep their work areas clean and orderly at-all-times

Detailed Procedures:

1.The ED will create and supervise this policy.

a. The COO will implement and supervise this policy, in coordination with Security and the GM

2. Parking lot area maintenance

a. Each morning before opening, at closing time, and throughout the day, under direction from the GM, SEC will:

- Patrol the entire area including the parking lots and surrounding areas, picking up and disposing of trash
- Make sure that patients and caregivers enter and exit the building in an orderly fashion
- Make sure that their own appearance is neat and orderly, wearing clean uniforms provided by the security company and keeping all their equipment clean and well maintained

3. Reception and dispensing areas

a. Each morning before opening, at closing time, and throughout the day as needed, under direction of the GM, staff will:

- clean and sanitize their work areas, picking up and disposing of any trash and using appropriate cleaning products on scales and computer equipment
- keep their workspaces organized, neat and orderly
- keep any drink or food dispensing areas sanitary and orderly using appropriate cleaning products and disposing of trash
- sanitize door handles, counters, and bathrooms with appropriate cleaning products
- vacuum or scrub floors in their work area

4. Procurement, and storage areas

a. Each morning before opening, at closing time, and throughout the day as needed, under direction of the GM, staff will:

- clean and sanitize their work areas, picking up and disposing of any trash and using appropriate cleaning products on stainless steel surfaces, scales and computer equipment
- keep their workspaces organized, neat and orderly
- vacuum or scrub floors in their work area

5. Management offices

a. Each morning before opening, at closing time, and throughout the day as needed, under the direction of the GM, management will:

- clean and sanitize their work areas, picking up and disposing of any trash and using appropriate cleaning products on surfaces and computer equipment
- keep their workspaces organized, neat and orderly
- vacuum or scrub floors in their work area

6. Plants and clones

a. Each morning before opening, at closing time, and throughout the day as needed, under direction of the GM, staff will:

- clean and sanitize their work areas, picking up and disposing of any trash
- keep their workspaces organized, neat and orderly; drain and coil hoses

- vacuum or scrub floors in their work area, making sure no dirt or chemical products contaminate any part of the dispensary
- keep all equipment used clean and in good working condition

Attachments:

None

Procedure #:	Policy Name: Management of Marketing Plans	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Management of Marketing Plans

Purpose:

To ensure that products are procured and sold in a way that maximizes patient benefits and the solvency of the collective; to make the proper products available, and to communicate their availability and features to members in a clear and timely fashion

Definitions:

None.

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) - implement and supervise this policy and to set marketing goals and access successful implementation of plans and achieving of goals

Finance Director (FD) – to analyze financial data to assess marketing programs

Purchasing Agent (PA) – to source needed products in keeping with the Marketing Plans, current market prices and availability

Office Administrator (OA) – to assist with social media, public relations, and advertising

General Manager (GM) – to implement this policy on a day-to-day basis and coordinate flow of information and products between departments

Detailed Procedures:

1. Development of a marketing plans

a. The ED will set marketing goals and plans for achieving goal, communicating these plans and goals to the COO, and GM. The ED, with the COO, will assess achievement of goals and success of plans, adjusting them as needed.

2. Implementation of marketing plans

a. The COO will communicate the marketing plans and goals to all staff. Under direction of the GM they will coordinate the flow of information between departments so that marketing plans are implemented successfully.

b. The COO will hold weekly meetings with the FD, PA, the GM, and the OA to access product availability, sales trends, and communications. The COO will make needed adjustments to adhere to marketing plans and update them as needed.

3. Social media and website management

a. The COO will work with the GM to manage social media and the website. They will assign staff to photograph, describe, and place all items on the menus, both in house and online.

b. The COO is responsible for creating a functioning online menu, and for supervising the team that keeps it current and operational. The GM will assure all stock is listed on the online menu, and that the menu is functional at all times.

4. Advertising and Public Relations

a. The PA will coordinate with vendors to coordinate staff training and to schedule in-house demonstrations for patients. The GM will coordinate the demonstrations on the day they are scheduled. The OA will schedule staff trainings, which the GM will assist in implementing them.

b. The COO and GM will work together to develop, implement and analyze special sales offers (e.g. holidays, new patients), with the assistance of the FD.

c. The PA will obtain informational materials about products. The OA and GM will make sure these are generally in stock, and in the reception area or dispensary for members.

Attachments:

None

Procedure #:	Policy Name: Adherence to ADA	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Adherence to ADA

Purpose:

To provide accommodations in architectural standards, practices and procedures in compliance with non-discrimination requirements of the Americans with Disabilities Act (ADA) that prohibit exclusion, segregation, and unequal treatment.

Definitions:

ADA - Americans with Disabilities Act of 1990 (ADA) – Federal civil rights legislation requires employers to provide reasonable accommodations to employees with disabilities, and imposes accessibility requirements on public accommodations. The current text of the ADA includes changes made by the ADA Amendments Act of 2008 (P.L. 110-325), which became effective on January 1, 2009.

In July 2010 Attorney General Eric Holder signed final regulations revising the Department's ADA regulations, including its ADA Standards for Accessible Design. The official text was published in the Federal Register on September 15, 2010 (corrections to this text were published in the Federal Register on March 11, 2011).

The revised regulations amend the Department's 1991 the 1991 title III regulation (public accommodations), 28 CFR Part 36. These final rules went into effect on March 15, 2011, and were published in the 2011 edition of the Code of Federal Regulations (CFR).

See: http://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm#a209

Scope:

Facility wide, including parking lot

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) - to implement and supervise this policy, in coordination with Security and the General Manager

General Manager (GM) - to supervise this policy, in coordination with Security and the COO.

Office Administrator (OA) - with the COO, will coordinate all repairs with outside contractors.

Security (SEC) - to report any problems or needed repairs anywhere in the facility or on the ground

All NorStar Pharmaceuticals staff – to report any problems or needed repairs in their work area or anywhere in the facility or on the ground

Detailed Procedures:

1. Providing necessary architectural elements and services for patients

a. The COO, under the supervision of the ED, will ensure that the dispensary will provide, in keeping with local building codes and the ADA:

- Handicapped parking spaces with ample room for wheelchair lifts
- An accessible entrance to the dispensary
- An accessible route to the dispensing area
- At least one accessible restroom for each sex or a single unisex restroom
- Accessible drinking fountains
- If requested, accommodations for patients with visual, hearing or other impairments.

2. Reporting repairs or problems

a. The COO will establish a reporting system for repairs or problems. If any staff member, or SEC, notices a problem or needed repair, they are responsible for using this system at the time they notice the issue, so that repairs can be handled in a timely manner and so that problems can be addressed immediately.

b. The Office Administrator, with the COO, will coordinate all repairs with outside contractors. The COO is responsible for making sure each repair meets ADA standards and that it is done by properly licensed and permitted contractors.

Attachments:

None

Procedure #:	Policy Name: Management of a Community Benefits Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Management of a Community Benefits Plan

Purpose:

To gather input from and provide education and support to patients, caregivers, staff and the surrounding community regarding the safety and security of the facility, the uses of cannabis as a medicine, and the compassion programs that the facility provides

Definitions:

None

Scope:

Facility wide and throughout the surrounding neighborhood

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy

Purchasing Agent (PA) - to select, package and store products for the Compassion Program

General Manager (GM) – to assist with scheduling of staff trainings and oversee day-to-day operations of community service programs

Office Administrator (OA) - develop a registration form and procedure for verifying a patient's eligibility for the program and training staff on signing patients up for the program.

Digital Media Manager (DMM) - to develop and update the webpage and monthly calendar to inform patients, caregivers and the community of services and programs and to keep all social media platforms updated

Receptionist (REC) – to assist with registering patients for compassion programs; to keep flyers and announcements about community services in stock and up to date at the entrance to the dispensary

Security (SEC) - to implement and supervise this policy, in coordination with COO

Cannabis Service Specialist (CSS) – to distribute information about compassion programs to members and to assist patient members who are in this program

Detailed Procedures:

1. Developing and implementing compassion programs for patients

a. The ED and COO, in coordination with the GM, will develop and implement a compassion program for indigent, seriously ill patients including, establishing and publicizing program benefits, such as free or reduced-price cannabis medicines and/or food bank packaged meals. They will establish and publicize criteria for patient eligibility, with the assistance of REC and the GM.

b. Establishing and publicizing criteria for patient eligibility. This will include seniors, qualified low-income patients, and military veterans who are residents of Santa Rosa.

c. The DMM will develop and update the webpage and monthly calendar to inform patients, caregivers and the community of services and programs and to keep all social media platforms updated

d. The COO and OA will develop a registration form and procedure for verifying a patient's eligibility for the program and training staff on signing patients up for the program. The GM will train all REC, who will then register applicants for the program.

e. The COO will establish and publicize day(s) of the week and times when patients may participate. The GM and REC are responsible for assuring that this information is distributed to members. It will be printed on flyers, signs, and the Receptionist will tell each member about this program. The COO will assure the website contains information about the program and how to register.

f. The COO will work with the PA to select products for the Compassion Program. The PA and GM will assign a staff member to package the compassion program products for members.

g. The CSS will dispense compassion program products to patients in need.

h. The COO will create programs to gather input from patients on their needs, and adjust the program as needed. The GM, with the assistance of the REC and, will gather this data.

2. Developing and implementing educational programs on safety and awareness

a. The ED and COO, in coordination with the GM, outside experts and vendors, will develop, implement and publicize outside educational offerings for staff, patients, and the community. This will include:

- Personal safety and emergency procedures

- Inclusiveness, nondiscrimination and preventing verbal and physical harassment
- CPR training, avoiding blood-borne pathogens, responding to medical emergencies such as seizures
- Strains and forms of cannabis and their medical uses.

3. Being an active, inclusive community member

- a. The ED, COO, or their designee, will attend and participate in meetings of local neighborhood and community groups, such as the Neighborhood Crime Prevention Council, making presentations about the dispensary's operations if asked.
- b. The ED, COO, or their designee will attend and participate in meetings of local patient support groups to further the goals of expanding safe access to medical cannabis.
- c. The COO, with the assistance of the GM and other staff, will plan, promote and host regular community events such as BBQs.
- d. The COO, with the assistance of the GM and other staff, will plan, promote, and host cultural activities such as sponsoring a community beautification program near the dispensary in an effort beautify the area; sponsoring in-house art exhibits to promote local artists
- e. The GM will post and manage a community bulletin board at the dispensary on which members and neighbors can promote local business, services, and organizations.

4. Conducting charitable giving programs

- a. The ED and COO will plan and implement charitable works such as:
 - Collecting clothing and winter supplies for distribution to organizations such as Operation Dignity, Salvation Army, and St. Vincent de Paul's.
 - Donating meals to local food banks and organizations at Thanksgiving and at other times of the year
 - Donating to local community improvement projects, particularly those improving the lives of youth, such as skate parks and basketball summer camps.
 - Sponsoring local community events
 - Donating to wellness, research and support organizations
 - "Adopting" the neighborhood: removing and disposing trash, painting, gardening and making repairs
 - Sponsoring marijuana policy reform efforts and cannabis business and education conferences in order to support mission-based cannabis entrepreneurship; offering scholarships to conference to communities impacted by the drug war
 - Collecting monies for special cases, including helping seriously ill children of a members or a holiday donation drive to support children of parents incarcerated for non-violent cannabis crimes
 - Collecting Valentine's Day cards and donations for people in prison for non-violent marijuana crimes; donating to organizations like the Marijuana Lifers Project.

5. Encouraging and enabling staff to volunteer throughout the year in their local neighborhoods

a. The ED and COO will organize staff to participate in events like local literacy programs, to volunteers at community Thanksgiving dinners, and to participate in park and community fundraising programs.

6. Designating a community ombudsperson

a. The ED will designate the COO to act as the community relations' manager and liaison. This person will be assigned as the point of contact to address neighborhood concerns.

b. SEC, REC, or any other staff who is the point person for receiving a visit from a concerned neighbor should be friendly and accommodating. It is essential to take down all the details of the complaint, and to give this to the COO. If the situation requires immediate attention, the COO should be phoned, and the information should be relayed. If not, the information should be recorded in written form, and emailed to the COO or placed in their inbox. This information should include the name of the person, the date, the time, their phone and email address, and a detailed report on the situation.

c. The COO must respond to each concern or complaint in a timely manner. This may be immediately in certain situations, or soon for others. All responses should be tracked and filed with the original complaint, and the resolution should be noted.

Attachments:

None

Procedure #:	Policy Name: Recordkeeping, Storage and Document Provision	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Recordkeeping, Storage and Document Provision

Purpose:

To keep, store, and provide records in a manner that ensures security and complies with state and local law including Track and Trace requirements

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy

Finance Director (FD) – to supervise and manage all finance data and sales records for NorStar Pharmaceuticals

Office Administrator (OA) – to execute a paper back up of financial and patient records at the end of each business day and store these records in a secure location; to provide documents to officials as required by law and upon request

General Manager (GM) – to manage day-to-day operations in keeping with this policy

Receptionist (REC) - to scan and maintain records electronically

Detailed Procedures:

1. Keeping financial, inventory, patient, and customer records

a. The REC will maintain records electronically via the POS database, and by scanning the customer, patient or caregiver's documents into an electronic file, the State of California Medical Marijuana Identification Card number issued by the County or the County's designee pursuant to California Health and Safety Code Section 11362.7 et seq, or a copy of the patient's written recommendation and caregiver designation.

b. The OA is responsible for backing up data each day in two ways, both in a cloud-based system and on a computerized backup system. The OA will keep an accurate account of the number of members that visit the dispensary each month, and also for the entire permit year.

c. The OA, under supervision of the COO, will ensure that a general ledger of cash transactions is maintained, as well as records of all members' contribution of labor or other resources made to the dispensary.

d. The OA, under the supervision of the COO, will maintain a log of patient complaints containing at a minimum the date of the complaint, the complaining patient's identification number or reference to his/her written recommendation, the nature of the complaint, and the action taken by the dispensary to address the complaint.

2. Storing financial, inventory, customer and patient records

a. The OA, with the supervision of the COO and assistance of the GM, will make sure that at the end of each day, back up all patient and financial records via a secure internet connection and server to a Cloud-based system, and to a thumb drive. This thumb drive will be kept in a locked safe for storage.

b. The OA, with the with the supervision of the COO and assistance of the GM, will assure that at the end of each day, all printed patient and financial records are filed and locked in a secure cabinet.

c. At the end of each month, the OA will transport all paper copies of daily financial and patient records, along with a copy of the thumb drive, to storage in a secure off-site storage facility.

d. The COO will ensure that all financial records are kept for 7 years and that employment records are kept for 7 years. All written documents will be destroyed after these times, under the supervision of the COO.

e. The COO and OA will perform a yearly inventory of the storage facility to ensure that records are being kept in a safe, orderly, and easily accessible manner.

3. Providing documents to authorities

a. The CEO and COO, with the assistance of the OA and FD, will provide the city with all membership and financial information required for inspection, upon notice.

b. The CEO and COO will provide the city, Board of Equalization or IRS financial information regarding the dispensary, upon request, and as needed to conduct an audit or to verify tax compliance and/or gross receipts tax requirements.

c. The CEO and COO, with the assistance of the OA and FD, will make available to the City Administrator the books, papers, tax returns for the purpose of verifying the accuracy of any declaration made or to ascertain the business tax due, compliance with and applicable laws.

d. The ED, COO, OA and FD will respond quickly and completely, in a cooperative manner, to any administrative subpoena with the production of relevant books, papers and records.

4. Track and Trace recordkeeping

a. The ED, with assistance from the COO will ensure that the IM maintains accurate records of cannabis product transactions of both incoming and outgoing cannabis products and that reporting is conducted in accordance with current state law and best practice management.

Attachments:

None

Procedure #:	Policy Name: Opening Procedures	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Opening Procedures

Purpose:

To ensure that the dispensary is opened in a secure and timely manner, and that all monies and cannabis are properly accounted for and readied for the day's transactions

Definitions:

None

Scope:

Facility wide and within 200 feet of the doors

Responsibilities:

Executive Director (ED) – to create and supervise this policy

Chief Operation Officer (COO) - to implement and supervise this policy

Security (SEC) - to implement this policy

General Manager (GM) – to open the dispensary to staff in the morning and oversee opening procedures

Finance Director (FD) – to supervise and manage all finance data and sales and cash counting

Receptionist (REC) – to manage assigned opening tasks

Cannabis Service Specialist (CSS) - to manage assigned opening tasks

Detailed Procedures:

1. Opening the door to opening staff and management

- a. At 8:30 AM or ½ hours before opening, the overnight SEC will be patrolling the parking lot.
- b. At 8:30 AM or ½ hours before opening, the ED, COO, OA, or GM will open the door to the dispensary and let dispensary staff and the overnight SEC inside.
- c. The overnight SEC will lock the door and turn on the lights.
- d. The GM will enter the alarm code and disarm the alarm system.
- e. All Staff will clock in and secure their belongings in the break room before going to their stations

2. Opening the vault and safe; assigning product and cash to service stations

- a. The COO, GM, or OA will unlock the cash drop safe and remove the previous evenings cash sales envelopes from it. They will re-count all the cash in the cash envelopes, checking to see that it matches the tally sheet from the night before.
- b. The COO, GM or OA will open the main cash safe and add the previous evenings funds to the bundles. They will count the entire cash inventory, using a cash inventory sheet. This sheet will be given to the FD, to balance the cash count and to investigate cash over/short issues.
- c. The GM, or their designee, will prepare the numbered cash envelopes with \$150 each in change and assign them to BT's, as they are assigned their daily service stations.
- d. The GM, or their designee, remove the daily cannabis supply from the safe, and will supervise a daily morning count of all active stock. Stock will be assigned to BT's, and set up near at each station. All inventory tallies will be given to the FD, who will match the totals to the previous evenings count. The FD will track each over/short issue, tracking and solving the problems. All discrepancies will be put on trouble tickets, and will be reported to the COO.

3. Deploying daytime Security Staff

- a. At 8 AM or one hour before opening, the SEC will change shifts and begin their duties.
- b. The SEC assigned to the front door will open the door for staff as they arrive, and relock the door after they enter.

4. Setting up the reception area

- a. The REC will enter the building and turn on the computer and FAX/scanning machine and make sure the any other equipment is charged or is charging.
- b. The REC will clean the bathroom and stock it with toilet paper and hand towels. They will clean the reception area, picking up and disposing of any trash, and wiping down counters and machines, and will vacuum the front desk and lobby areas
- c. The REC will stock the reception area with calendars and other literature for patients
- d. The REC will check the email inbox and will manage any callbacks and deliver any messages to the correct staff member, either in person or by placing them in their mailboxes.

5. Setting up the dispensary room

a. The CSS will receive their station assignments, cash envelopes and cannabis supply from the GM. They should go immediately to their station, placing their cash in the cash drawer, and checking their supply of medicine is as assigned.

b. BT's will turn on their computers and sign in to the POS program. If any problem arises, the GM will assist.

c. The GM will assign tasks as follows:

General Manager:

- Restock display cases and make sure each item is properly labeled
- Turn on the monitors with the day's menu, confirming accuracy and

making any adjustments needed

- Start music in the lobby

CSS #1 will:

- Organize literature on tables
- Ensure all flyers and magazines are stowed away on flyer rack
- Sanitize all door handles
- Windex all glass in bar area (display cases and shelves)

CSS #2 will:

- Restock counter and stations with all merchandise and supplies
- Put the donation jars out on the counter
- Restock bar with hand sanitizer
- Sweep and Swifter the bar area

CSS #3 will:

- Wipe down the water cooler
- Stock cups at water cooler
- Brew coffee and set up coffee station

4. Radio pick up and check

a. All SEC and staff members are responsible for checking out a numbered walkie-talkie and for turning it on at the beginning of their shift.

b. Before opening, the GM will supervise a radio check, calling each walkie-talkie by number and making sure that each staff member and SEC responds when his or her number is called.

5. Opening the doors to patients

a. At 9 AM or at opening time, the front door SEC will announce on the radios to all staff that the doors are opening.

b. The SEC will open the front door and allow patients to enter, ensuring that they do so in an orderly fashion.

Attachments:

None

Procedure #:	Policy Name: Closing Procedures	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Closing Procedures

Purpose:

To ensure that the Dispensary is closed in a secure manner and that all monies, cannabis and cannabis products are accounted for and secured.

Definitions:

None

Scope:

Facility wide and within 200 feet of the doors

Responsibilities:

Executive Director (ED) – to create and supervise this policy

Chief Operation Officer (COO) - to create, implement and supervise this policy

Security (SEC) – to implement this policy, in coordination with COO

General Manager (GM) – to close the dispensary in the evening and oversee closing procedures

Receptionist (REC) – to manage assigned opening tasks

Cannabis Service Specialist (CSS) - to manage assigned opening tasks

Detailed Procedures:

1. Locking the dispensary door at closing time
 - a. Under supervision from the ED and COO the closing Supervisor will announce by radio to all staff that the Dispensary is closing at 8 PM.
 - b. The REC and BCSS serve all members who are in the building, but no new members will be allowed to enter after 8 PM.

c. The SEC will check that all patients have left the Dispensary, and escort them out to the parking lot if needed. One guard will remain stationed inside the front door until all patients have left. A guard or the REC will check the restroom to make sure no patient is inside before closing the door.

d. After all the patients are out of the building, SEC will lock the front door.

e. The SEC stationed in parking lot will make sure all patients go to their cars in a quiet and orderly fashion, and that the parking lot gate is locked behind them.

2. Counting cash drawers and securing monies

a. After all patients have left the building and the front door is locked, the GM will hand out numbered Cash Bags to each CSS. Each CSS will count and record their cash on tally sheets. They will put these sheets and all funds into the numbered bags, and will give them to the GM to put in the cash drop safe.

b. At the end of each shift, CSS will:

- Use POS system to print out the day's sales total
- Count all change and bills, entering in the number of coins or bills in each denomination on a Bank Till-Tally Sheet and into the POS program
- Report any discrepancy between the counted amount and the sales total to the GM
- Enter their name and the number of their cash bag on their Bank Till-Tally Sheet
- Place the Bank Till-Tally Sheet and all cash inside the cash bag
- Turn in cash bags to the General Manager

3. Securing cannabis flowers from the dispensary floor

a. CSS will empty their station and all displays and feelers of cannabis product inventory each evening, and return any items to the GM.

b. The GM will store these items in the safe for the evening.

4. Tidying and cleaning counter

a. Each CSS is responsible for leaving their counter space in a clean and orderly fashion. They will:

- Remove donation jars from the counter and place them out of view beneath the counter
- Dispose of any trash or extra office supplies
- Straighten products on counter and wipe it down

5. Computers, scales and walkie-talkies

a. At the end of the working day, each BT is responsible for exiting the POS software program and turning off their computer and any scales.

b. All Staff are required to turn off and place their walkie-talkies on a charger.

6. Clone care

a. Clones will be watered as needed at closing time by a CSS.

Attachments:

None

Procedure #:	Policy Name: Maintaining Fully Integrated Equipment	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintaining Fully Integrated Equipment

Purpose:

To maintain all equipment (computers, scales, telephones, etc.) in a fully integrated manner that ensures security and complies with state and local law

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy; to perform system audits and to manage repairs

Office Administrator (OA) – to schedule and supervise outside service providers

General Manager (GM) – to oversee the day-to-day operation and enforcement of this policy

Detailed Procedures:

1. Setting up fully integrated equipment

a. Under supervision from the ED the COO will hire an outside service provider to manage IT. Under the supervision of the COO or their designee, his person will connect all dispensary computers to a central server box, either hard-wired or via a secure Wi-Fi network connection

b. The IT provider will connect all scales to computers running POS software in the dispensing and procurement areas via USB cables.

c. The COO will hire a service provider to connect the telephone lines and alarm systems through an integrated system.

2. Maintaining fully integrated equipment

a. Under the supervision from the ED the COO, with the assistance of the OA and the GM, will respond to any reported issues with the integrated systems in a timely manner. Employees should report any problems with systems immediately to their supervisor.

b. The COO will conduct performance audits monthly and/or as recommended by equipment manufacturers to ensure that the systems are working properly

c. The COO, with the assistance of the OA and the GM, will schedule routine maintenance on all equipment as recommended by manufacturers.

Attachments:

None

Procedure #:	Policy Name: Entry by Service Professionals	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Entry by Service Professionals

Purpose:

To ensure that entry by service professionals is conducted in a manner that complies with state and local law for maximum security

Definitions:

None.

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy

Office Administrator (OA) – to schedule and supervise outside service providers

General Manager (GM) – to supervise outside service providers

Receptionist (REC) – to greet outside service providers

Detailed Procedures:

1. Notifying the City of Third-Party Visitors to the Dispensary

a. Under supervision from the ED the COO or OA will notify the City Administrator at least 24 hours before a non-patient service professional will be visiting the facility, including:

1. Who the guest will be (e.g. licensed contractors, government officials)
2. When the short-term, limited duration visit will take place
3. Why their presence is necessary (e.g. to perform verifiable construction or other work), and
4. Measures that will be taken to prevent diversion of cannabis during the visit

b. No outside persons will be allowed to enter, unless approved.

2. Allowing Visitors to Enter and Preventing Diversion During the Visit

a. Under supervision from the ED the COO, OA or GM will inform SEC and the REC that a visitor is coming and instruct them to alert the GM when the service professional has arrived.

b. SEC and the REC will greet any visitors at the Reception desk and issue them a Visitors ID Badge. The GM will come to the desk escort them to the area where they will be working.

c. A staff member escort will be assigned by the GM to monitor any visitor's work. They will observe them directly and via security cameras to make sure they stay at their workstation.

d. All staff will make sure that cannabis products remain secure and out of reach of the visitor.

e. The GM or assigned staff will escort any visitor to the dispensary exit upon completion of their work and collect their Visitor ID Badge.

Attachments:

None

Procedure #:	Policy Name: Management of the Management & Operations Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Management of the Management & Operations Plan

Purpose:

To ensure that the Management and Operations Plans are properly managed and updated

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to oversee the Management and Operations Plan; to update the plan as needed and promulgate the new policies; to conduct an annual review of the plan

Chief Operation Officer (COO) – to implement and supervise the Management and Operations Plan; to seek and receive input from staff and patients on changes and updates that are needed and to report these to the CEO

Detailed Procedures:

1. Management of the Management and Operations Plan

- a. The ED will, at all times, be aware of the management and operations plan, and evaluate the dispensary's adherence to the plan using appropriate performance standards and markers (e.g. sales volume, employee performance, patient satisfaction).
- b. The ED and COO will foster an open environment where staff and supervisors feel able to discuss any suggested improvements to the management and operations plan.
- c. The ED will update the management and operations plan as needed and the COO will promulgate the changes to the necessary staff.

d. The ED, with the assistance of the COO, will conduct an annual review of the management and operations plan and make necessary adjustments to improve the efficiency and service level of the dispensary.

Attachments:

None

Procedure #:	Policy Name: Facilities Maintenance	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Facilities Maintenance

Purpose:

To maintain the dispensary in a manner that ensures security and complies with state and local law

Definitions:

None

Scope:

Facility wide and within 200 feet of the facility

Responsibilities:

Executive Director (ED) - to create and supervise this policy; to approve maintenance budget and any additional costs

Chief Operations Officer (COO) – to implement and supervise this policy; to perform regular inspections and routine maintenance of facilities; to investigate and respond to reports of needed maintenance

Office Administrator (OA) –to contract with outside service personnel as needed in coordination with General Manager and COO

General Manager (GM) – to receive reports of needed maintenance and assign Staff with investigating; to oversee regular inspection of facilities, routine maintenance, and outside contractors

Detailed Procedures:

1. Establishing a procedure for maintaining the facility
 - a. The ED, in coordination with the COO, will establish a procedure and budget for routine maintenance of the facility.
 - b. Under supervision of the COO, the GM will train staff and management to report to repairs to the OA.
2. Performing routine and as-needed maintenance
 - a. The COO will perform regular inspections and routine maintenance on the dispensary building and parking lot, on a monthly basis or as needed.
 - b. The OA, under the supervision of the COO and with the coordination of the GM, will contract with outside service personnel to perform maintenance as needed.
 - c. The COO will ensure each maintenance report is responded to in a timely manner, either performing the repair according to building code and other pertinent laws or securing estimates from licensed contractors who can perform the maintenance.
 - d. The COO will receive and review estimates from GM of any additional maintenance costs and secure approval of expenditures from CEO
 - e. The OA will disperse approved payments to equipment and service providers.

Attachments:

None

Procedure #:	Policy Name: Internal Signs	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Internal Signs

Purpose:

To post signs inside the dispensary to inform patients of policy and their rights in a clear manner that complies with state and local law

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy; to design signs that meet state and local regulatory requirements with maximum clarity and readability

General Manager (GM) – to deploy internal signs in proper places to maximize visibility and effect

Detailed Procedures:

1. Creating necessary internal signs

a. The COO will supervise design and printing of white signs with black lettering, with font size at least one inch, and overall size at least 18" x 33" that say:

PATIENT NOTICE

1. YOU HAVE THE RIGHT TO HAVE YOUR PRODUCT REWEIGHED AND SUPPLEMENTED IF IT IS UNDER THE STATED WEIGHT AT THE TIME OF PURCHASE.

2. IF YOU DO NOT HAVE A VALID STATE OF CALIFORNIA IDENTIFICATION CARD ISSUED BY OAKLAND COUNTY HEALTH DEPARTMENT OR A VALID PATIENT ID CENTER CARD, THIS DISPENSARY MUST CONFIRM YOUR MEDICAL NEED FOR CANNABIS. IF YOU HAVE A VALID IDENTIFICATION CARD, YOU SHOULD NOT BE ASKED FOR ADDITIONAL INFORMATION.

3. THE DIVERSION OF CANNABIS FOR NONMEDICAL PURPOSES IS A VIOLATION OF STATE LAW.

4. THE USE OF CANNABIS MAY IMPAIR A PERSON'S ABILITY TO DRIVE A MOTOR VEHICLE OR OPERATE HEAVY MACHINERY.

5. LOITERING AT THE LOCATION OF A MEDICAL CANNABIS DISPENSARY FOR AN ILLEGAL PURPOSE IS PROHIBITED BY CALIFORNIA PENAL CODE SECTION 647(h).

6. THIS MEDICAL CANNABIS DISPENSARY HAS RECEIVED A PERMIT TO OPERATE FROM THE CITY OF Santa Rosa.

2. Signs about services and policies

a. The COO will supervise creation of signs to help patients be aware of specials and services, laboratory testing information, and price adjustments. They will also create signs to inform patients of policies such as purposeful inclusion and diversity.

b. The General Manager will post all signs where members can easily view them.

3. Posting licenses and tax certificates

a. The ED will ensure that NorStar Pharmaceuticals post a copy of the Business Tax Certificate and a copy of the Cannabis Dispensary Permit issued by the City in a conspicuous place on the premises.

Attachments:

None

Procedure #:	Policy Name: Ordering of Supplies and Equipment	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Ordering of Supplies and Equipment

Purpose:

To maintain stock of all necessary supplies and equipment in an efficient manner

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy; to create ordering budget

General Manager (GM) – oversee weekly ordering of needed supplies with the Office Administrator

Office Administrator (OA) – to conduct a weekly inventory of supplies and order items; secure budget approval to order them from the COO; to receive and disperse items ordered in their proper place

Floor Manager (FM) – working with the Office Administrator, conduct weekly inventory of needed supplies

All Staff – to write on the Order Board any supplies that are needed

Detailed Procedures:

1. Determining needs and placing orders

a. Under supervision from the ED the COO will pre-approve items for ordering and make the list of these items available to the GM and OA. The COO will approve orders of any items not on the pre-approved list, if they cost more than \$200.

b. The OA, with the assistance of the FM, will conduct a weekly inventory of supplies (stationery, packaging supplies, cleaning supplies, etc.)

c. The OA will note the items staff has written on the Order Board and make sure they are not in back stock.

d. The OA will order pre-approved items and secure approval for other items as needed. They will source items for maximum quality, price, and timely delivery.

e. The OA is responsible for securing any items needed outside of the weekly ordering plan, such as important items that ran out early.

2. Receiving and dispersing shipments

a. The OA will set up a receiving area in the dispensary back room for all shipments.

b. The REC will receive all orders, using the walkie-talkie to call the GM or OA to let them know of all deliveries.

c. The OA will receive and record orders as they arrive in the receiving area. They will open all boxes and inspect the items, making sure they are in good condition and that the order has been filled properly.

d. The OA will disperse supplies to the appropriate departments, or into back stock. They will keep a record of how many items are in back stock, and where they are located.

3. Creating a list of needed supplies.

A. Staff will write on the Order Board items that we are running low on or need to order.

Attachments:

None

Procedure #:	Policy Name: Maintenance of Electronic Recordkeeping	
Approved By:	Approval Date:	Effective Date: ____
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintenance of Electronic Recordkeeping

Purpose:

To maintain electronic records in a manner that ensures accuracy and security and complies with state and local law

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy; to oversee monthly inventory counts and reconcile with electronic systems

General Manager (GM) – to maintain the POS system with daily updates to products offered, prices; to ensure that sales data is entered properly by Patient Services Clerks and by the Receptionist

Cannabis Service Specialist (CSS) – to properly enter all sales into the POS system

Inventory Specialist (IS)– to properly enter all weights and product counts into the POS system

Finance Director (FD) - review daily records to make sure data is being entered accurately

Receptionists (REC) - properly scan and enter patient data into the patient database

Detailed Procedures:

1. Maintaining the POS system with daily updates to products offered and prices
 - a. Under the supervision of the COO, the GM will review daily the products and prices entered into the POS system and perform any updates needed, including the addition or termination of any specials on products. They will ensure that the POS database is updated throughout the day as inventory shifts and new products are made available for sale.
2. Ensuring that sales are entered properly by CSS
 - a. The COO, with the assistance of the GM, will train each BT on entering sales into the POS system.
 - b. The COO, with the assistance of the FD, will review daily records to make sure data is being entered accurately. The COO is responsible for making sure each staff member is retrained, if needed.
3. To ensure that patient data is entered properly by the Receptionist and properly maintained
 - a. The COO, with the assistance of the GM will train the REC on properly entering patient data into the patient database, and on scanning the patients' recommendation and copy of their driver's license or state-issued ID into an electronic file.
 - b. The COO, with the assistance of the OA, will review the records to make sure they are being properly maintained. They will check that all data is being entered properly, including the expiration dates of the patient's recommendations.
 - c. The COO, with the assistance of the GM, will train the Receptionists on updating patient data upon expiration of their doctor's recommendation, and as needed (e.g. address and other contact information; health concerns or prescription medications taken).
4. To conduct monthly inventory counts and reconcile product inventory with the electronic database
 - a. The COO will oversee monthly inventory counts of all dispensary products. On the last day of the month, staff will be assigned to stay late and count stock.
 - b. The FD will reconcile available inventory with electronic database. With the COO and GM, they will investigate and understand each over/short.
 - c. The COO or GM may adjustments to prices and availability of products as needed in the electronic database.
5. The COO will oversee the entering of inventory counts and all dispensary products into the POS system.
 - a. The IS, under supervision from the COO, will properly enter all weights and product counts into the POS system as they arrive.

Attachments:

POS software provider literature sections regarding record maintenance

Procedure #:	Policy Name: Traffic Control	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Traffic Control

Purpose:

To ensure that the streets outside the dispensary are not impacted by dispensary operations

Definitions:

None

Scope:

Facility wide and within 200 feet

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy in coordination with Security and the Community Ombudsperson

Security (SEC) – to train its agents in the implementation of this policy; to oversee day-to-day operations

Ombudsperson (OP) – to assist with developing this policy and with a mechanism to receive, respond to, and address community complaints about traffic issues

Detailed Procedures:

1. Management of traffic control

a. The ED will implement a traffic control plan to assure NorStar Pharmaceuticals visitors get off of the street and into the parking lot immediately upon arrival. The COO will implement this policy, using outside consultants and services, as needed.

b. A security agent will be stationed in the parking lot during dispensary operating hours, plus one hour before opening and one hour after closing. These agents

will, as needed, direct visitors to the parking spaces as they arrive and assist visitors with exiting parking spaces.

c. SEC will assure that at no time will people be allowed to wait on the street to turn into the parking lot. The parking spaces closest to the street will be used by staff, and will be low use spaces. Visitors will be asked to pull far into the lot, while waiting to pull into their space. This will allow cars to wait for parking, while other visitors pull out safely.

d. If the parking lot is full, Security will close the lot and direct visitors away from the dispensary. The dispensary has a visitor limit that matches its parking spaces, so if the lot is full, the dispensary is also at capacity. Visitors will be waved on by security, and a large sign announcing the lot is full will be placed in a visible location.

2. Addressing traffic issues

a. Under the supervision of the ED, the COO will establish and implement a procedure to solicit and receive community complaints and suggestions about traffic issues in the area around the dispensary.

b. The CEO will work with the COO and SEC to revise and implement new policies that address issues raised in complaints or suggestions. This may include hiring outside consultants to assist with developing and implementing solutions, including hiring additional SEC and valet parking all cars in the lot.

c. The COO, with the assistance of the OP, will communicate to complainants and the community at large the dispensary's policy on traffic issues and any changes that are made to that policy.

Attachments:

Map of the dispensary parking lot and street

Procedure #:	Policy Name: Providing Education and Referrals on the Benefits and Potential Abuses of Cannabis	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Providing Education and Referrals on the Benefits and Potential Abuses of Cannabis

Purpose:

To implement an educational awareness program for patients, caregivers, staff and the community that explains the benefits and potential abuses of cannabis; to provide information and/or referrals to substance use disorder education, prevention, and treatment programs

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to create, implement and supervise this policy; to supervise creation of printed and online materials; to develop and implement community programs about cannabis uses and substance abuse

General Manager (GM) – to assist with scheduling of staff trainings and patient/caregiver educational programs and to assure materials are available for those in need and to consult with patients or caregivers who may need education or referrals about cannabis uses and substance abuse

Human Resources (HR) - in coordination with COO; to write and update sections in Staff manuals to include information about cannabis uses and abuse, and referrals to substance abuse programs

Digital Media Manager (DMM) – to develop and update webpage and monthly calendar to inform patients and caregivers of educational programs and referrals

Receptionist (REC) –to assist with registering patients, caregivers and the community for educational programs; to keep flyers and announcements about educational programs in stock and up to date at the entrance to the dispensary

Detailed Procedures:

1. Developing and implementing educational programs for patients, caregivers and staff
 - a. The ED and COO, in coordination with the GM and outside experts and vendors, will develop, implement and publicize educational programs and groups for patients, caregivers and staff, such as:
 - The benefits and potential abuses of cannabis
 - Signs of substance abuse to look for in oneself and others
 - Proper intervention methods for substance abuse disorders

b. The ED will identify key community programs or agencies to refer people to for substance use disorder education, prevention, and treatment programs

2. Offering educational services to patients and caregivers

b. The GM, under the supervision of the COO, will interface with any patients or caregivers need of substance abuse educational services or referrals by being alerted by the REC or BT when a patient or caregiver is in need of counseling or information about cannabis uses or substance abuse. Any staff member in need of assistance or referrals should be managed by the COO or by HR.

c. Once notified of an issue, the GM or COO will spend time in the dispensing area observing if a patient is agitated or in difficulty, and will approach them to offer help.

d. If encouraged by the member, the GM or COO will maintain a dialog with the person, communicating with patients about the results of their cannabis therapies and concerns about their use of cannabis and other substances.

e. The COO or GM will refer patients and caregivers to dispensary-lead educational programs and groups, and to outside substance use disorder education, prevention, and treatment programs.

f. The COO should be alerted if a staff member is in need of counseling or information about cannabis uses or substance abuse. The COO will refer them to dispensary-lead educational programs and groups, and to outside substance use disorder education, prevention, and treatment programs.

3. Developing and implementing community educational programs

a. The ED and COO, in coordination with the GM, outside experts and vendors, will develop, implement and publicize educational offerings for staff, patients, and the community such as

- Strains and forms of cannabis and their medical uses
- Signs of cannabis abuse
- Resources for substance abuse prevention and treatment.

b. The DMM will post all educational offerings on the company website.

Attachments:

Brochures from outside experts and vendor/partners

Procedure #:	Policy Name: Seeking and Maintaining Certification as a Green Business	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Seeking and Maintaining Certification as a Green Business

Purpose:

To demonstrate continuous compliance with applicable environmental regulations; to conserve energy, water, and other materials; to implement sound environmental practices that prevent pollution and waste generation; and to share environmentally responsible practices with other businesses in the community

Definitions:

None

Scope:

Facility wide and within 200 feet of the facility

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to apply for Green Business Program certification; to implement and supervise compliant policies; to renew certification as needed

General Manager (GM) – to train staff on compliant policies and oversee day-to-day operations to ensure compliance with the Green Business Program

Office Administrator (OA) – to supervise developing patient and employee handbooks with information about the Green Business Program and how to comply with it; to develop and post signs in the dispensary with the Pledge to Stay Green

Digital Media Manager (DMM) – to update the website and social media sites with information about this program

Ombudsperson (OP) – to share the dispensary's environmentally responsible practices with other businesses in the community

Detailed Procedures:

1. Applying for Certification as a Green Business

- a. The COO will ensure that the Dispensary meets all requirements for Green Business Certification by working with appropriate agencies and companies to develop policies and procedures to comply with all applicable regulations, striving to exceed compliance.
- b. The COO will supervise the sourcing and purchase of necessary equipment and systems to meet certification requirements (e.g. energy efficient appliances).
- c. The CEO, with the assistance of the COO, will complete the County Green Business Application and secure certification.
- d. The OA will post of the Green Business Certification certificate in the dispensary.

2. Maintaining Certification as a Green Business

- a. The COO will work with business and local agencies to verify that compliance with applicable environmental regulations, including but not limited to visits from wastewater, storm water, CUPA (hazardous materials/waste) and Air.
- b. The COO will identify ways to conserve resources and to prevent pollution and will implement policies that do so. The COO will use the county Green Business checklist to select and record measures to conserve water and energy, prevent pollution and reduce waste.
- c. The ED will renew the Green Business Certification as needed in a timely and efficient manner, striving to exceed compliance whenever possible. The OA will post the updated Green Business Certification certificate in the dispensary.

2. Training staff and members on Green Business policies

- a. The COO will supervise development of protocols for compliance with Green Business policies for inclusion in member and employee handbooks.
- b. The GM will train staff on procedures for compliance with Green Business policies, and will oversee day-to-day operations to ensure they are compliant with Green Business policies
- c. The DMM will publicize and promote the policy.
- d. The COO will supervise creation of flyers and education programs about Green Business policies for staff, members, and the community.
- e. The OA will design and post signage in the dispensary saying:
"We believe a successful business is dependent on a healthy environment. We are actively working very hard to show our environmental responsibility to our community by committing to the following objectives:
 1. To comply with all applicable regulations and strive to exceed compliance
 2. To conserve energy, water, materials and other resources
 3. To develop and implement practices that prevent pollution and waste

4. To be an environmentally responsible business within our community
5. To strive for continuous improvement.

If you have questions about the Dispensary's Green Business Policy, please see (the COO or Ombudsperson)."

3. To share the dispensary's environmentally responsible practices with other businesses in the community

a. The ED, with the assistance of the COO and the OP, will develop and implement an educational program to inform other businesses in the community about the dispensary's environmental practices. This includes attending local meetings and events about community environmental practices and making presentations about dispensary practices when asked

b. The ED, with the assistance of the COO, will work cooperatively with the community and neighboring businesses to implement sound environmental policies.

4. Sharing the dispensary's environmentally responsible practices with other businesses in the community

a. The DMM will update the website and social media sites with information about this program

Attachments:

Procedure #:	Policy Name: Employee Identification Badge Policy	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Mandatory Employee Identification Badges

Purpose:

Sets forth the process for mandatory employee identification badges

Definitions:

Employee: All agents, officers, or other persons acting for or employed by a licensee

Scope:

Company-wide all employees

Responsibilities

Executive Director (ED) – to establish and supervise this mandate

General Manager (GM) – to implement and supervise this policy

Human Resources (HR) – to ensure all employees and new hires are issued an identification badge prior to engaging in commercial cannabis activity

Detailed Procedures:

1. Assuring all employees have the correct employee identification at all times.
 - a. The Executive Director (ED) is responsible for assuring that all NorStar Pharmaceuticals employees are wearing their employee identification badges at all times, while engaged in commercial cannabis activity.
 - b. The Executive Director will develop and maintain this policy in good standing at all times.
2. Human Resources (HR) will ensure that all employees and all new hires have a current employee identification badge in accordance with all State and Local regulations, policies and directives prior to engaging in commercial cannabis activity.
3. Human Resources (HR) will ensure that all employee identification badges are durable plastic or are laminated in plastic.
4. At a minimum, all employee identification badges will have the following features:
 - a. Company DBA and State Commercial Cannabis license number
 - b. Employees first name
 - c. Employee unique identification number
 - d. Color photograph clearly showing the employees face that is at least 1.5 inches high and 1 inch wide
5. The General Manager (GM) will ensure that all employees wear their badge prominently above the waste so that it is visible and unobstructed by clothing, beard or hair and seen above the sales counter or demo tables.

Attachments:

Section 26013, Business and Professions Code. Reference: Section 26070, Business and Professions Code.

Procedure #:	Policy Name: Visitor Identification Badge Policy	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Mandatory visitor identification badges

Purpose:

Sets forth the process for mandatory visitor identification badges

Definitions:

Employee: All agents, officers, or other persons acting for or employed by a licensee

Customer: Person(s) authorized to purchase commercial cannabis from A or M Licensees

Visitor: Authorized individuals such as any outside vendors, contractors, or other individuals conducting business that requires access to the limited-access area(s)

Limited Access Area: Non-retail area or any area other than reception or the sales floor. All storage, vault and back of house areas are limited access areas

Scope:

All visitors

Responsibilities

Executive Director (ED) – to establish and administrate this mandate

General Manager (GM) – to implement and supervise this policy

Reception (REC) – to execute this policy

Detailed Procedures:

1. Assuring all visitors are screened and properly identified
 - a. The Executive Director (ED) and General Manager (GM) are responsible for assuring that all NorStar Pharmaceuticals visitors are screened and issued visitor identification badges and are escorted by an employee at all times

- b. The Executive Director (ED) and General Manager (GM) will develop and maintain this policy in good standing at all times
- 2. Screening persons upon entry.
 - a. Reception (REC) will ensure that all persons entering the facility are screened and properly identified as either an employee, customer or a visitor
 - b. If the person entering the facility is an employee Reception (REC) will ensure that they are wearing their employee identification badge
 - c. If the person entering the facility is a customer, Reception (REC) will verify their current customer status
 - d. If the person entering the facility is a visitor, Reception (REC) will notify a manager who will verify the visitor is authorized to enter the facility and Reception (REC) will issue a unique Visitor Identification Badge and enter the visitor, and the Visitor Identification Badge number, into the NorStar Pharmaceuticals Visitor Entry Log
- 3. Escorting visitors.
 - a. The manager, or their employee designee, will escort the visitor into the facility and ensure that the visitor is escorted at all times, when entering or conducting business in Limited Access areas
 - b. No visitor under the age of 21 may be allowed into Limited Access Areas
- 4. End of visit.
 - a. Upon completion of each visitor's business, the visitor will be escorted back to Reception (REC). The visitor will surrender the Visitor Identification Badge to Reception (REC) who will secure the Visitor Identification Badge and enter the exit time into the NorStar Pharmaceuticals Visitor Entry Log upon the visitor's departure
- 5. Making the NorStar Pharmaceuticals Visitor Entry Log available to the BCC upon request.
 - a. The Executive Director (ED) will ensure that the NorStar Pharmaceuticals Visitor Entry Log is available upon request to the BCC

Attachments:

NorStar Pharmaceuticals Visitor Entry Log

Section 26013, Business and Professions Code. Reference: Sections 26010, 26012, 26070 and 26140, Business and Professions Code

Procedure #:	Policy Name: Process for Allowing Individuals Access to the Premises	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Process for Allowing Individuals Access to the Premises

Purpose:

Sets forth the process for allowing individuals access to the premises

Definitions:

None

Scope:

All customers, visitors, contractors and employees

Responsibilities

Executive Director (ED) – to establish and administrate this mandate

General Manager (GM) – to implement and supervise this policy

Office Administrator (OA) – to verify individual customer status; ensure employees, contractors and visitors are issued identification badges prior to allowing access to the premises

Reception (REC) – to assist the Office administrator (OA) in executing this policy

Detailed Procedures:

1. Process for Allowing Individuals Access to the Premises
 - a. The Executive Director (ED) will establish and administrate this mandate with supervision from the General Manager (GM).
 - b. Individuals seeking access to the premises for the purpose of purchasing cannabis will be screened and verified in accordance with the NorStar Pharmaceuticals Management and Operations Manual Section Three: Patient and Caregiver Registration and Recordkeeping.

- c. A NorStar Pharmaceuticals employee shall be physically present in the retail area at all times when individuals who are not employees of NorStar Pharmaceuticals are in the retail area.
- d. All Adult User individuals seeking to purchase cannabis goods must show proof of patient status and or acceptable forms of identification (described as follows) prior to being given access to the premises as Adult Users. All Adult users must be 21 years of age or older. Medical Marijuana Patients must be 18 years of age or older with current Doctor's recommendation.
- 2. Acceptable forms of identification
 - a. Acceptable forms of identification include; 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 picture of the person; or a valid identification card issued to a member of the Armed Forces that includes a date of birth and a picture of the person; or valid passport issued by the United States or by a foreign government.
 - b. A valid proof of identification must clearly indicate the age or birthdate of the individual.
- 3. Allowing employees access to the premises
 - a. Reception (REC) will grant access to the premises by employees if they are displaying their current Employee Identification Badge in accordance with the NorStar Pharmaceuticals Wellness Employee Identification Badge policy.
- 4. Allowing visitors and contractors access onto the premises
 - a. REC will grant visitors and contractors access to the premises only in accordance with the NorStar Pharmaceuticals Wellness Visitor Identification Badge Policy and only after verifying authorization from the GM or the ED.
 - b. REC will inform any distributors attempting to make cannabis product deliveries that they must use a separate distributor entrance during business hours in accordance with the NorStar Pharmaceuticals Wellness Distributor Plan.
- 5. Limited access areas
 - a. Only employees displaying their employee identification badge may have access to limited access areas.
 - b. Visitors and contractors will only be granted access to limited access areas in accordance with the NorStar Pharmaceuticals 'Securing Limited Access Areas Plan' and only if they have official business to conduct and if they are escorted by a NorStar Pharmaceuticals employee at all times.

Attachments:

NorStar Pharmaceuticals ID Badge Policy

NorStar Pharmaceuticals Visitor ID Badge Policy

Securing Limited Access Areas Plan

NorStar Pharmaceuticals Wellness Management and Operations Manual Section Three:
Patient and Caregiver Registration and Recordkeeping

Section 26013, Business and Professions Code. Reference: Sections 26010, 26012, 26070
and 26140, Business and Professions Code

Procedure #:	Policy Name: Securing Limited Access Areas	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Securing Limited Access Areas

Purpose:
Sets forth the process limited access areas

Definitions:
Limited Access Area: any area not associated with the sales floor or retail operations like manufacturing areas, administrative offices, vaults, safes and cannabis product storage areas

Scope:
All non-sales areas

Responsibilities
Executive Director (ED) – to establish and supervise this mandate

General Manager (GM) – to implement and supervise this policy

Assistant General Manager (AGM) – to assist the General Manager (GM) with implementation and supervision of this policy

Security (SEC) - to assist the General Manager (GM) in supervising this policy

Cannabis Service Specialist (CSS) – to assist in enforcing this policy

Reception (REC) – to assist in enforcing this policy

Detailed Procedures:

1. Establishing the Limited Access Areas
 - a. Under the supervision of the Executive Director (ED), and with direct oversight by the General Manager (GM), the Assistant General Manager (AGM) will establish well marked boundaries and barriers to Limited Access Areas as determined by the ED.
 - b. Barriers will be erected by the AGM, or their designee, using TSA style crowd control barriers and adequate signage.
 - c. Signage will be big and bold and will state "Limited Access Area. I.D. Badge Required Beyond this Point. Visitors Must Have Employee Escort".
2. Keeping Limited Access Areas Secure
 - a. The GM, AGM, Cannabis Service Specialist (CSS), Reception (REC) and Security (SEC) will ensure that no persons, including employees, shall be allowed in the Limited Access Areas unless they have been issued and are wearing a current identification Card in accordance with the NorStar Pharmaceuticals Employee Identification Badge Policy or the Visitor Identification Badge Policy.
 - b. All visitors entering the Limited Access Areas must have an employee escort at all times.

Attachments:

NorStar Pharmaceuticals Employee Identification Badge Policy

NorStar Pharmaceuticals Visitor Identification Badge Policy

Procedure #:	Policy Name: NorStar Pharmaceuticals Distributor Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

NorStar Pharmaceuticals Distributor plan

Purpose:

Sets forth the process for Distributor intake

Definitions:

None

Scope:

All Distributor intake

Responsibilities

Executive Director (ED) – to establish and administrate this mandate

General Manager (GM) – to implement and supervise this policy

Inventory Manager (IM) – to execute this policy and ensure all Distributors comply

Reception (REC) – to screen Distributors and notify the Inventory Manager of Distributor arrival

Security (SEC) – to escort and secure all Distributor product deliveries

Distributor (DIST) – person(s) licensed by the state of California to sell and make product deliveries to licensed retail establishments

Detailed Procedures:

1. Distributor Qualifications

a. The GM, with assistance from the IM, will ensure that all DIST provide appropriate licensing information before or upon arrival. NorStar Pharmaceuticals can only do business with licensed DIST who meet current regulatory requirements.

- b. Prior to transporting or delivering cannabis goods to a licensee, a DIST shall generate a shipping manifest through the track and trace system.
 - c. The DIST shall securely transmit the manifest to the Bureau and the licensee that will receive the cannabis goods prior to transporting the cannabis goods.
 - d. The ED will develop and maintain this policy in good standing at all times
 2. Fielding calls from a DIST without an appointment
 - a. A DIST who calls to see the IM that does not yet have an appointment will be informed by REC that appointments are required to see the IM.
 - b. The REC will verify if the IM has an appointment time to give the DIST for a future date and time. If the IM has a future date and time available, then the DIST will be given a future appointment and the IM will ensure that the DIST is informed of our vendor policies and protocols by emailing a copy of the policy to the DIST.
 3. Receiving Distributors that have appointments
 - a. DIST with an appointment will notify REC that they have arrived.
 4. Fielding calls from non-distributors that want a vending appointment
 - a. Persons calling to talk to the IM about vending that do not have a DIST will be transferred to the IM, if the IM has the time to talk to them, and the IM will inform them of the protocols to get distribution. The IM may put the person(s) in touch with a licensed DIST or, in some cases, offer to take the product in under the NorStar Pharmaceuticals Distribution license as a one-time solution.
 - b. If the IM does not have time to talk to the person(s) at this time then REC will take the contact information and forward that to the IM who will contact the person(s) at their earliest convenience.
 5. Safe DIST escort protocol
 - a. Upon arrival, REC will inform the DIST to wait in the parking lot and that the IM and SEC will escort them to the appropriate entrance
 - b. REC will notify the IM and SEC that the DIST is in the parking lot waiting to be escorted into the facility.
 - c. The IM will verify receipt of the shipping manifest. If the shipping manifest has been received the IM will initiate escort protocol. If the shipping manifest has not yet been received the IM will inform the DIST that a shipping manifest must be received prior to product delivery and acceptance.
 - d. Upon shipping manifest verification, the IM and SEC will meet the DIST in the parking lot and escort them into the building.
 - e. If the delivery is during non-business hours the escort delegation may use the main entrance. If the delivery is during business hours the escort delegation must use the DIST entrance and exit which is the east door on the Adeline St. side of the building.
 - f. SEC and the IM will escort from the south door down the hallway to the door to packaging.
 - g. The IM will knock on the packaging door and staff inside will use the peep hole to verify that it is the IM with SEC before opening the door for them.
 - h. SEC and the IM will escort the DIST to the IM office where they will complete the transaction.
 6. Receiving product from the DIST

a. The IM will only take into possession cannabis goods that are listed on the product shipping manifest and only the amounts as listed on the product shipping manifest.

b. All products entering the facility must be verified by the IM or management that it meets all requirements and meets regulatory guidelines for licensing, testing, dosage, labeling and packaging.

7. Recording DIST deliveries

a. All DIST products, including samples, received will be immediately entered into the Track and Trace system in accordance with current regulatory guidelines by the IM, or their designee, prior to making said products available for retail sale.

8. Inventory documentation

a. The ED, with assistance from the GM, will ensure that the IM will maintain an accurate record of all NorStar Pharmaceuticals product inventory. The ED shall provide the Bureau with the record of inventory upon request. The IM shall keep a record of the following information for all cannabis goods the retailer has in its inventory;

(i) A description of each item in the retailer's inventory. This description will be such that the cannabis goods can easily be identified;

(ii) An accurate measurement of the quantity of the item;

(iii) The date and time the cannabis goods were received by the retailer;

(iv) The sell-by or expiration date on any cannabis goods, if any;

(v) The name and license number of the licensee that delivered the cannabis goods to the retailer;

(vi) The name and license number of the distributor that provided the cannabis goods to the retailer; and

(vii) The price the retailer paid for the cannabis goods, including taxes, delivery costs, or any other costs.

9. DIST exit escort

a. Upon completion of the delivery transaction, SEC will escort the DIST back to the parking lot through the DIST exit unless it is after hours in which case SEC may escort the DIST out the main entrance.

b. SEC will ensure that the DIST is securely inside their vehicle and on their way out of the parking lot before securing the escort.

Attachments:

Section 26013, Business and Professions Code. Reference: Sections 26010 and 26070, Business and Professions Code

Section 26013, Business and Professions Code. Reference: Sections 26010 and 26012, Business and Professions Code.

Procedure #:	Policy Name: Transportation Procedure	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Transportation Procedure

Purpose:

Sets forth the Cannabis Goods Transportation process

Definitions:

Scope:

All Cannabis product movement and or deliveries

Responsibilities

Executive Director (ED) – to create and establish this mandate

General Manager (GM) – to implement and supervise this policy

Purchaser (PA) – to ensure Transportation of cannabis good are arranged by the Licensed Distributor or other Transportation arrangements are contracted for each product delivery

Detailed Procedures:

1. NorStar's Detailed Transportation Plan
 - a. The Executive Director (ED) will create and establish this mandate.
 - b. The General Manger (GM) will implement and supervise this policy.
 - c. The Purchaser (PA) will ensure that the Transportation of cannabis good are arranged by the Licensed Distributor or that other Transportation arrangements, with a licensed Transporter, are contracted for each product delivery.
 - d. Under no circumstances will NorStar Transport cannabis goods.
 - e. The ED will maintain this policy in good standing at all time.

Attachments:

Chapter 2 (commencing with Section 34620) of Division 14.85 of the Vehicle Code
Section 26013, Business and Professions Code. Reference: Sections 26012, 26160 and
26070, Business and Professions Code

Procedure #:	Policy Name: Waste Management: Destruction and Disposal of Medical Cannabis	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Waste Management: Destruction and disposal of cannabis products

Purpose:

To establish and implement a safe and secure handling processes for cannabis waste products

Definitions:

None

Scope:

Facility Wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Operations Officer (COO) – to implement this policy

General Manager (GM) – to oversee and execute this policy

Detailed Procedures:

1. Destroying and disposing of cannabis products

a. With supervision from the ED the COO, the GM, or their designee, will destroy all out-of-date cannabis products, stems, floor buds or any other cannabis products deemed waste material, and unusable and nonreturnable cannabis products by:

b. Using an industrial grinder and grinding cannabis products with coffee beans and/or other compostable products as to make them unusable.

c. No cannabis goods shall be disposed of as cannabis waste pursuant to this policy unless the cannabis goods have been removed from their packaging and rendered unrecognizable and unusable.

2. Composting cannabis waste

a. NorStar Pharmaceuticals may choose compost cannabis waste on the premises, and the CEO shall ensure it is done so in compliance with Title 14 of the California Code of Regulations at Chapter 3.1 (commencing with Section 17850).

3. Storing destroyed cannabis products

a. The GM will ensure that all destroyed cannabis products are placed into a secure locking refuse receptacle until they can be disposed of directly to a sanitation service. The secure receptacle area is restricted to the licensee and its employees and the local agency, local agency franchiser, or permitted private waste hauler. Public access to the designated receptacle or area is prohibited.

4. Removal of destroyed cannabis products

a. The GM will contract with a sanitation service to safely remove cannabis waste from the facility as needed.

b. If a local agency, a local agency franchiser, or permitted private waste hauler is being used to collect and process cannabis waste, the GM, or their designee, shall do all the following:

- (i). Provide the Bureau with the name of the entity hauling the waste
- (ii). Obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises; and
- (iii). Obtain a copy of the certified weight ticket, or other documentation prepared by the entity hauling the waste confirming receipt of the cannabis waste at one, or more, of the following solid waste facilities:

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

c. If NorStar Pharmaceuticals is self-hauling cannabis waste to one, or more, of the solid waste facilities, NorStar Pharmaceuticals shall obtain for each delivery of cannabis waste delivered, a copy of a certified weight ticket or receipt documenting delivery from the solid waste facility. Only the NorStar Pharmaceuticals employees may transport self-hauled cannabis waste.

Attachments:

Section 26013, Business and Professions Code. Reference: Section 26070, Business and Professions Code.

Procedure #:	Policy Name: Non-cannabis Waste Management	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Non-cannabis Waste Management

Purpose:

To set for the process for non-cannabis waste management.

Definitions:

None

Scope:

All non-cannabis Refuse

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement this policy in coordination with staff

Detailed Procedures:

1. Training staff on non-cannabis waste management
 - a. The General Manager (GM), under the supervision of the Executive Director (ED), will create educational training for staff on the dispensary's non-cannabis waste procedures.

2. Non-cannabis refuse receptacle

b. All non-cannabis waste will be secured in a locking refuse receptacle outside and behind the building.

c. Employee's wishing to dispose of non-cannabis refuse must sign out the key from the GM.

d. Staff is required to return the key to the GM upon completion of refuse disposal.

e. The GM will ensure that the outside refuse receptacle is locked at all times.

f. The following pictures shows the locking refuse station.





Attachments:
None

NorStar Pharmaceuticals Management and Operations Manual

Section Two: Inventory Management

Procedure #:	Policy Name: Appropriate Payment for Cannabis Goods	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Appropriate Payment for Cannabis Goods

Purpose:

To ensure that the dispensary pays appropriately for cannabis goods in order to offer the best prices to our patients and keep the organization viable.

Definitions:

Point of Sale (POS) System - a system that we use to facilitate the sale of cannabis for our patients.

Scope:

Purchasing Office

Responsibilities:

Executive Director (ED) - to establish a system for evaluating, pricing, and tracking cannabis medicines

General Manager (GM) - to implement this system, with the assistance of the Executive Director and the Assistant General Manager and working with the purchaser, to evaluate the quality of cannabis being acquired; to establish purchase value and donation-value cannabis medicines

Chief Finance Officer (CFO) - to review all purchases and payments and make recommendations to maximize inventory flow and profit

Office Administrator (ADMIN) - to keep all digital and paper records of purchases and sales accessible, orderly, and up to the standards of the collective's accounting plan

Purchaser (PA) - to evaluate all incoming products from Patient Providers and purchase products for the collective's membership; to provide weekly reports of all medical cannabis flowers, concentrates, packaged products, and clones onsite to the Chief Operations Officer/Project Manager

Inventory Manager (IM) - to relay useful information regarding inventory flow and stock to the Purchase Agent and General Manager.

Distributor (DIST) - to work with the Purchaser to provide quality and clean cannabis fitting the needs of our patients

Detailed Procedures:

1. Accessing patient and inventory needs and trends
 - a. The Purchaser (PA) shall be responsible for monitoring the inventory of all cannabis flowers, concentrates, packaged products, and clones onsite in order to purchase necessary products. They should monitor purchasing patterns, customers and patients. The General Manager (GM), and the Inventory Specialist (IS) are to ensure that the required products are stocked, giving special attention to high-CBD and THC-A products and products that provide alternative forms of ingestion (e.g., vaporizers).
2. Conducting market research
 - a. The (GM) and (PA) are responsible for keeping tabs on industry patterns and prices by monitoring other dispensaries' websites, reading pertinent industry publications, and attending industry events. NorStar Pharmaceuticals will supply cannabis to our members at the fairest prices and meet the needs of the widest range of people possible.
3. Inspecting products
 - a. The Executive Director (ED) will ensure that all cannabis medicines are lab-tested for molds, mildews, and chemical contamination, as well as for their potency. The (GM) and the (PA) are responsible for choosing the testing lab and implementing the testing system, and the (PA) is

responsible for managing the daily task of ensuring the medicines have been tested.

b. The (PA) will perform an organoleptic examination of all incoming flowers from Distributors (DIST), using smell, feel and visual inspections to check for the following:

Odor (terpene profile, lack of mold or mildew smell)

Color (green, not brown)

Cleanliness (lack of visible mold, mildew or other contaminants)

Size of buds

Lack of stems and seeds

Moisture content

c. Concentrates will be examined for smell and visual appearance.

d. Packages and edibles will be examined for their integrity, and expiration date required labeling information, which will be recorded in the Point-of-Sale (POS) and Track and Trace system by the PA.

e. Clones will be examined for the presence of any mold, mildew, or pests.

4. Setting cost recovery price

a. The (PA) will set the cost recovery price offered for products by taking into account the following:

Current market value

Quality of the product

Availability and need for the product

Consistency of supply

b. The (PA) will inform the DIST that price is contingent on testing, and that that NorStar Pharmaceuticals maintains the right of refusal or price adjustment dependent upon receipt of test results.

c. The Chief Finance Officer (CFO) will review all purchases and payments, making recommendations to maximize inventory flow and profitability.

5. Recordkeeping

a. The (ED) and (GM) are responsible for monitoring product entry into the Track and Trace system ensuring all cannabis products are entered as they arrive into inventory.

b. The (PA) will track each item as it arrives into inventory, and as the (DIST) receive the negotiated cost-recovery prices. NorStar Pharmaceuticals will use a formal seed-to-sale inventory-tracking system to track each item. The IS, with oversight from the (GM), is responsible for ensuring that this seed-to-sale inventory-tracking system functions on a daily basis, that data is regularly reviewed, and that hard copies of all invoices and payments are kept on file.

Attachments:

None

Procedure #:	Policy Name: Maintaining an Inventory Management System	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintaining an Inventory Management System

Purpose:

To create a comprehensive tracking system for all inventory acquired by the dispensary for our members' needs

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Stock Keeping Units (SKUs) - a product identification code assigned to each product for tracking purposes

Scope:

Administration and Dispensary Room

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to oversee day-to-day operations in line with this policy; to implement and supervise this policy; to train managers on proper use of the inventory management system; to implement all updates and maintenance to the inventory management system, including all hardware and software

Inventory Manager (IM) - to record data on cannabis products in the inventory management system as they are received; to assign stock keeping units (SKUs) to all cannabis

Cannabis Service Specialist (CSS) - to enter sales into the POS system; to make suggestions about improvements to the inventory management system to the General Manager

Detailed Procedures:

1. Selecting an inventory management system
 - a. The General Manager (GM) will conduct an investigation into available inventory management systems. With the assistance of the Executive Director (ED), they will select and purchase an inventory management system, including all necessary hardware, software, and maintenance services.
2. Maintaining and implementing an inventory management system
 - a. The General Manager (GM) will train all managers on the proper use of the inventory management system.
 - b. The (GM) will implement all updates and maintenance to the inventory management system, including all necessary hardware and software updates and maintenance.
 - c. The Inventory Manager (IM) will assign SKUs to all cannabis and cannabis products available at the dispensary and enter them into the inventory management system. They will work with the GM on developing product labeling to track products using bar codes and other methods to ensure efficiency and accuracy of inventory management.

d. The (IM) and (GM) will review weekly reports on product flow and implement procedural changes to improve inventory tracking.

e. The (IM) will record data on cannabis products in the inventory management system at the time of receipt, including information on where the products are stored and whether they need to be labeled. The IS will record data on cannabis products in the inventory management system as products are stored, placed onto the sales floor, labeled, or sold.

f. The (IM) will bring tested cannabis from the vault to the production area to package and label then the (IM) will enter it into the system and will put it on the floor, along with two feeler jars and a display.

g. The (GM) will train Patient Service Clerks (PSCs) on the proper use of the inventory management system in line with this policy. They will provide suggestions about improvements to the inventory management system to the GM.

e. (CSS) will enter sales into the inventory management system in line with this policy. They will provide suggestions about improvements to the inventory management system to the (GM).

Attachments:

None

Procedure #:	Policy Name: Safe Storage of Cannabis	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Safe Storage of Cannabis

Purpose:

To ensure medicinal cannabis products are securely stored for freshness and inventory control purposes.

Definitions:

None

Scope:

Safe Storage Room and Vault

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy, to oversee day-to-day operations in line with this policy; to lock up the safe at the end of the night

Assistant General Manager (AGM) - to lock up the safe at the end of the night

Purchaser (PA) - to store cannabis products in safe storage upon receipt in line with this policy; to monitor all access to the safe storage room during the day; to unlock the storage room at the beginning of the day

Closing Supervisor - to lock up the safe at the end of the night

Security (SEC) - to monitor all access to the safe-storage room during the day via video security system

Detailed Procedures:

1. Storing cannabis and cannabis products safely throughout the day and during opening and closing
 - a. The Executive Director (ED) will create and supervise this policy.
 - b. The General Manager (GM) will train the Purchaser (PA) and Assistant General Manager (AGM) on safe storage.
 - c. The GM and PA, working with the COO/PM, will oversee day-to-day operations to ensure proper procedure is followed.
 - d. The (GM) will set up and maintain security cameras, locks, and alarms in the safe storage room/vault locations, in coordination with the Security (SEC) and other vendors.
 - e. The (PA) and (GM) will monitor all access to the safe storage room during the day in conjunction with Security (SEC).
 - f. The (PA) will unlock the storage room at the beginning of the day and the Closing Supervisor, (GM), or (AGM) will lock it at the end of the day.
 - g. The (PA), (GM), or Supervisor will store cannabis products in the safe storage room and vault locations as they are received, in line with this policy.
 - h. (SEC) will monitor all access to the safe storage room and vault locations during the day (when necessary) via video security system, as directed by the (GM).

Attachments:

None

Procedure #:	Policy Name: Cannabis Product Recalls	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Cannabis Product Recalls

Purpose:

To establish procedures for managing cannabis product recalls.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to establish and supervise a system for product recalls

General Manager (GM) - to implement and supervise this system

Chief Finance Officer (CFO) - to monitor recall costs

Purchaser (PA) - to contact suppliers whose products are affected by recalls; to negotiate returns and reimbursements

Office Administrator (ADMIN) - to track recalls; to assist in seeking reimbursements

General Manager (GM) - to monitor medicinal cannabis products for spoilage; to receive any adverse effect reports from members

Inventory Manager (IM) - to monitor medicinal cannabis products for spoilage; to receive any adverse effect reports from members

Reception (REC) - to direct product complaints from members to the appropriate supervisor

Senior Patient Service Clerk (SPSC) - to receive complaints from members and Patient Service Clerks; to monitor medicinal cannabis products for spoilage

Patient Service Clerk (PSC) - to direct product complaints from members to the General Manager; to monitor medicinal cannabis products for spoilage

Detailed Procedures:

1. Establishing and implementing a product recall process

a. The Executive Director (ED) will research and stay up to date on all state and local laws and policies regarding product recalls.

b. The ED will establish a product recall system in keeping with state and local laws. He or she will establish dispensary standards for recalls (e.g., if a product is found to be contaminated or in violation of regulations).

c. The NorStar Pharmaceuticals Product Recall System is multi-tiered, with the ED, General Manager (GM), Purchaser (PA), Senior Patient Service Clerk (SPSL) or Patient Service Clerk (PSC) all capable of launching the recall process.

d. The GM, with supervision of the ED, will establish reasons and procedures for recalling cannabis products, including the following:

Removing a product from the shelf if it has expired

Implementing a recall by a supplier or governmental body

Training staff on conducting and analyzing organoleptics and lab tests, and on procedures for reporting possibly tainted products

e. The ED or GM will establish a policy for exchanges or reimbursements to patients on recalled products, with emphasis on giving patients choices. For exchanges, a bonus of 15% could be established.

f. The GM will establish a policy and procedures for securing reimbursement from suppliers, which shall be managed by the PA.

g. The Chief Finance Officer (CFO) will track recall costs.

2. Training staff and educating members
 - a. The GM will develop training materials and train all managers on product recall policies and procedures. The GM will train Reception (REC) and PSCs on this policy.
 - b. The GM will develop and promulgate materials to inform patients, caregivers, and suppliers of dispensary product recall policies.
3. Acting on product complaints from members
 - a. The REC and PSCs are to direct product complaints from members to the GM.
 - b. The GM will meet with the patient and record their complaint in the either in shared notebooks or through email threads to identify solutions as a team. We operate on a case-by-case basis for patient returns and exchanges, always replacing defective or tainted products and providing a discount or additional product for patients' inconvenience. If patient is unsatisfied with their purchase, we will identify their needs and accommodate accordingly.
 - c. The GM will determine if the product is still in inventory in the dispensary and remove it from the shelf and inventory, taking it to the PA and/or the IM to return it to the supplier and negotiate product reimbursement.
 - d. The PA will send the product to the appropriate location for return or destruction.
 - e. The GM will alert the PA and IM to make changes in the Point of Sales (POS) system
4. Monitoring products for problems and taking action
 - a. PSCs will monitor medicinal cannabis products for spoilage and expiration dates. They will report potential problems to the GM.
 - b. The GM will take questionable products to the PA, IM, for evaluation, after which they will determine the next steps. Any expired or damaged products will be taken off the shelves and reported to the PA, who will note the change in the POS System.
5. Tracking recall costs and securing reimbursements

a. The CFO will monitor recall costs and report them to the ED.

b. The Office Administrator (ADMIN) will track product recalls and assist in seeking reimbursements from suppliers.

c. The PA will contact suppliers whose products are affected by such recalls to negotiate returns and reimbursements.

Attachments:

None

Procedure #:	Policy Name: Twice Monthly Inventory Counts	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Twice Monthly Inventory Counts

Purpose:

To reconcile active stock and point-of-sale data for non-cannabis products twice monthly

Definitions:

None

Scope:

Administration

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Finance Officer (CFO) - to monitor product costs and counts

Purchaser (PA) - to review the end-of-the month report generated by the Financial Director

General Manager (GM) - to implement, oversee and execute this policy

Assistant General Manager (AGM) - to review the end-of-the month report generated by the Financial Director

Inventory Manager (IM) - to perform an end-of-the-month product count and reconcile stock with sales data

Cannabis Service Specialist (CSS) - to assist with monthly inventory counts

Detailed Procedures:

1. Twice Monthly inventory counting

a. Under direction from the Executive Director (ED), the Inventory Manager (IM) will generate a Twice monthly report of sales data on the first and fifteenth of each month. The monthly financial report is created by reviewing sales and product purchases. The report is generated by the Chief Finance Officer (CFO) and shared with the General Manager (GM), Assistant General Manager (AGM), Purchaser (PA), ED, and Shift Supervisors.

b. The (GM) and Cannabis Service Specialist (CSS) will perform end-of-the-month product counts of all packaged products are assigned to service stations at the beginning of each day. The IM or their assignee, will reconcile those monthly product counts with the inventory counts in the Inventory Management System.

c. The GM and CFO will identify any problems with inventory management, including accounting for any lost inventory.

Attachments:

None

Procedure #:	Policy Name: Loss Documentation and Reporting	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Loss Documentation and Reporting

Purpose:

To discover, research, and resolve any inventory overage or shortage issues

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Administration and Dispensary Room

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Finance Officer (CFO) - will create reports regarding inventory, finances, and discrepancies under the direction of the Executive Director; to identify issues with help from the Inventory Specialist.

Inventory Manager (IM) - to supervise the daily product reports from the Point of Sale system and report any discrepancies to the General Manager and Chief Operations Officer/Project Manager

General Manager (GM) - to implement, oversee and execute this policy; to receive discrepancy POS reports from Inventory Manager and take action to correct and report to the Assistant General Manager, Finance Director, and Executive Director if necessary.

Cannabis Service Specialist (CSS) - to assist with monthly inventory counts

Detailed Procedures:

1. To discover and report inventory discrepancies
 - a. Under direction from the Executive Director (ED), the Chief Finance Officer (CFO) will generate a daily report of sales data at the beginning of each day.
 - b. The General Manager (GM) and Cannabis Service Specialist (CSS)- will perform end-of-the-month product count of all packaged products and reconcile those counts with the inventory counts in the Inventory Management System.
 - c. The GM and PSCs will report any discrepancies to the Purchaser (PA) and the ED.
2. To research, resolve, and report on inventory discrepancies
 - a. The Inventory Manager (IM) and PA will receive reports on inventory discrepancies from the GM.
 - b. The GM and IM will research the reasons for discrepancies (e.g., shrinkage [loss of water content], theft, errors in entering sales data or weighing, etc.). The GM will interview PSCs and other staff, in addition to reviewing security-taped footage as needed.
 - c. The GM and IM will resolve errors in accounting, measuring, or weighing. They will report any losses to the ED.
 - d. The ED, with assistance from the GM, will take administrative action against staff responsible for discrepancies.
 - e. NorStar Pharmaceuticals will report to local authorities any theft of cannabis products by staff, members, or guests.

Attachments:

None

Procedure #:	Policy Name: Cash Management System	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Cash Management System

Purpose:

To create a fully transparent and substantiated policy for the management of all cash transactions.

Definitions:

None

Scope:

Administration and Dispensary Room

Responsibilities:

Executive Director (ED) - to create and supervise a transparent and substantiated system for cash transactions, for counting and bundling cash, and for transporting cash outside of the dispensary

Chief Finance Officer (CFO) - to tally and reconcile all cash-in and cash-out payments at the end or beginning of each working day; to reconcile each day's total cash on hand with the sales data from the Inventory Management System. The General Manager, Assistant General Manager, or Office Assistant can aid the ED in these duties

Purchaser (PA) - to execute cash payments for products in a safe, secure, and transparent manner

General Manager (GM) - to implement this policy; train Dispensary Patient Consultants on this policy; to dispense cash to the drawers on sales floor at the beginning of each working day and to record this disbursement; to keep track of cash coming into the sales floor and to secure it in a safe as needed

throughout the day; to count and bundle all cash at the end of each working day

Assistant General Manager (AGM) - to dispense cash to the drawers on sales floor at the beginning of each working day and to record this disbursement; to keep track of cash coming into the sales floor and to secure it in a safe as needed throughout the day; to count and bundle all cash at the end of each working day

Distributor (DIST) - to verify payments ensuring accuracy; to complete and sign necessary documents.

Security (SEC) - to observe cash transactions via a security camera and take immediate action upon seeing any problems. Must also have their walkie-talkies on them so they can be in quick communication when necessary.

Detailed Procedures:

1. Counting, bundling, and storing cash

a. At the beginning of each workday, in a manner observable by security cameras and under the direction from the Executive Director (ED) and the General Manager (GM)/Assistant General Manager (AGM), along with one other designated staff member, will:

Count all cash in the safe and record the total cash present by denomination on formal counting sheets.

Count all cash in each cash drawer envelope, record the total cash present by denomination, and reconcile that total with the sales data from the Inventory Management System.

Bundle and recount all cash taken in that day (clipped with paper clips in quantities of 25, then banded with rubber bands in bundles of 4 and 20).

Provide a report to the Finance Director (FD) of cash in the safe and cash taken in, by denomination. Individual bag counts, and the safe count will be entered in the appropriate spreadsheet through Google Drive. These counts will be printed and stored in the correct financial filing area.

b. Lock all cash in the safe after counting.

2. Disbursing cash to the sales floor drawers
 - a. At the beginning of each workday, in a manner observable by security cameras, the GM, Supervisor, or AGM will disburse a set quantity of cash in various denominations to each cash drawer for sales stations and record this disbursement.
 - b. This set cash amount will total \$150 per sales drawer, in denominations of \$10, \$5, \$1, \$.25, \$.10, and \$.05,
3. Implementing and executing a cash-out payment
 - a. The FD, GM, AGM, or Purchasing Agent (PA) will prepare a cash-out slip for the amount to be paid.
 - b. The GM, AGN, CFO, or PA will remove the proper amount of cash from the safe, then record that amount on the invoice that it was paid in cash.
 - c. The GM or PA will count any cash in front of the Distributor (DIST) or other payee and in view of the security camera in the procurement office.
 - d. The GM, AGM, CFO, or PA will witness the PP's signature on the invoice, denoting that the amount has been paid. He or she will attach a copy of the invoice to the cash-out slip and place it in the designated area for the CFO.
 - e. Every payment will be recorded in the bookkeeping system.
 - f. The CFO will provide weekly reports on payments made to the GM and ED.
4. Observing cash transactions via security-camera system.
 - a. Security (SEC) will observe cash transactions via the security-camera system and take immediate action upon observing any problems.

Attachments:

None

Procedure #:	Policy Name: Inventory Recordkeeping and Storage	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Inventory Recordkeeping and Storage

Purpose:

To establish a policy for the storage of inventory records.

Definitions:

None

Scope:

Administration

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Chief Finance Officer (CFO) - to review monthly inventory counts and create all necessary reports

Office Administrator (ADMIN) - to manage day-to-day operations of this policy; to review inventory records and properly store them

Inventory Manager (IM) - to supervise the monthly inventory count; to enter data into the Inventory Management Program; to provide daily, weekly, and monthly inventory reports to the General Manager. Insights on products that have sold, and daily reporting are accessible by all management via our POS System when necessary.

General Manager (GM) - to implement this policy; oversee monthly inventory counts and to ensure day to day inventory is accurate in our POS system.

Assistant General Manager (AGM)- to assist the GM with monthly inventory counts and day to day updates.

Detailed Procedures:

1. Keeping track records of inventory
 - a. The Inventory Manager (IM), with the assistance of other staff, will weigh and/or count inventory at the end of each month of ea.
 - b. This data will be entered into the Inventory Management Program. At the beginning of the day, the IM will delegate the cannabis to be packaged and labeled to the production crew, then he or she will add any new inventory into the system.
 - c. The IM will end-of-the-month inventory records generated by the Inventory Management Program to the General Manager (GM) and Chief Finance Officer (CFO).
2. To store inventory records in a safe way
 - a. The GM and CFO will receive an end-of-month-inventory report from the IM, and will coordinate with the IS to generate reports when needed.
 - b. The Office Administrator (ADMIN) will back up the reports onto a computer disk and also print them out and file them. These reports can also be printed by the FD, GM, and Assistant General Manager (AGM).
 - c. The Executive Director (ED) will ensure that NorStar Pharmaceuticals complies with all state and local regulations for storing and reporting financial and inventory-related data.

Attachments:

None

Procedure #:	Policy Name: Safe Receipt of Cannabis Deliveries	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Safe Receipt of Cannabis Deliveries

Purpose:

To receive deliveries of medical cannabis flowers and products in a safe, verifiable, and efficient manner.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts and inventory stock

Scope:

Facility-wide and within 200 feet of the dispensary

Responsibilities:

Executive Director (ED) - to establish and administrate this mandate

General Manager (GM) - to implement and supervise this policy

Inventory Manager (IM) - to execute this policy and ensure all Distributors comply

Reception (REC) - to screen Distributors and notify the Inventory Manager of Distributor arrival

Security (SEC) - to escort and secure all Distributor product deliveries

Distributor (DIST) - person(s) licensed by the state of California to sell and make product deliveries to licensed retail establishments

Detailed Procedures:

1. Distributor Qualifications

a. The GM, with assistance from the IM, will ensure that all DIST provide appropriate licensing information before or upon arrival. NorStar Pharmaceuticals can only do business with licensed DIST who meet current regulatory requirements.

b. Prior to transporting or delivering cannabis goods to a licensee, a DIST shall generate a shipping manifest through the track and trace system.

c. The DIST shall securely transmit the manifest to the Bureau and the licensee that will receive the cannabis goods prior to transporting the cannabis goods.

d. The ED will develop and maintain this policy in good standing at all times

2. Fielding calls from a DIST without an appointment

a. A DIST who calls to see the IM that does not yet have an appointment will be informed by REC that appointments are required to see the IM.

b. The REC will verify if the IM has an appointment time to give the DIST for a future date and time. If the IM has a future date and time available, then the DIST will be given a future appointment and the IM will ensure that the DIST is informed of our vendor policies and protocols by emailing a copy of the policy to the DIST.

3. Receiving Distributors that have appointments

a. DIST with an appointment will notify REC that they have arrived.

4. Fielding calls from non-distributors that want a vending appointment

a. Persons calling to talk to the IM about vending that do not have a DIST will be transferred to the IM, if the IM has the time to talk to them, and the IM will inform them of the protocols to get distribution. The IM may put the person(s) in touch with a licensed DIST or, in some cases, offer to take the product in under the NorStar Pharmaceuticals Distribution license as a one-time solution.

b. If the IM does not have time to talk to the person(s) at this time then REC will take the contact information and forward that to the IM who will contact the person(s) at their earliest convenience.

5. Safe DIST escort protocol

a. Upon arrival, REC will inform the DIST to wait in the parking lot and that the IM and SEC will escort them to the appropriate entrance

b. REC will notify the IM and SEC that the DIST is in the parking lot waiting to be escorted into the facility.

c. The IM will verify receipt of the shipping manifest. If the shipping manifest has been received the IM will initiate escort protocol. If the shipping manifest has not yet been received the IM will inform the DIST that a shipping manifest must be received prior to product delivery and acceptance.

d. Upon shipping manifest verification, the IM and SEC will meet the DIST in the parking lot and escort them into the building.

e. If the delivery is during non-business hours the escort delegation may use the main entrance. If the delivery is during business hours the escort delegation must use the DIST entrance and exit which is the east door on the Adeline St. side of the building.

f. SEC and the IM will escort from the south door down the hallway to the door to packaging.

g. The IM will knock on the packaging door and staff inside will use the peep hole to verify that it is the IM with SEC before opening the door for them.

h. SEC and the IM will escort the DIST to the IM office where they will complete the transaction.

6. Receiving product from the DIST

a. The IM will only take into possession cannabis goods that are listed on the product shipping manifest and only the amounts as listed on the product shipping manifest.

b. All products entering the facility must be verified by the IM or management that it meets all requirements and meets regulatory guidelines for licensing, testing, dosage, labeling and packaging.

7. Recording DIST deliveries

a. All DIST products, including samples, received will be immediately entered into the Track and Trace system in accordance with current regulatory guidelines by the IM, or their designee, prior to making said products available for retail sale.

8. Inventory documentation

a. The ED, with assistance from the GM, will ensure that the IM will maintain an accurate record of all NorStar Pharmaceuticals product inventory. The ED shall provide the Bureau with the record of inventory upon request. The IM shall keep a record of the following information for all cannabis goods the retailer has in its inventory;

(i) A description of each item in the retailer's inventory. This description will be such that the cannabis goods can easily be identified;

- (ii) An accurate measurement of the quantity of the item;
- (iii) The date and time the cannabis goods were received by the retailer;
- (iv) The sell-by or expiration date on any cannabis goods, if any;
- (v) The name and license number of the licensee that delivered the cannabis goods to the retailer;
- (vi) The name and license number of the distributor that provided the cannabis goods to the retailer; and
- (vii) The price the retailer paid for the cannabis goods, including taxes, delivery costs, or any other costs.

9. DIST exit escort

- a. Upon completion of the delivery transaction, SEC will escort the DIST back to the parking lot through the DIST exit unless it is after hours in which case SEC may escort the DIST out the main entrance.
- b. SEC will ensure that the DIST is securely inside their vehicle and on their way out of the parking lot before securing the escort.

Attachments:

Section 26013, Business and Professions Code. Reference:
Sections 26010 and 26070, Business and Professions Code

Section 26013, Business and Professions Code. Reference:
Sections 26010 and 26012, Business and Professions Code.

Procedure #:	Policy Name: Comprehensive Inventory Management System with Electronic Tracking	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Comprehensive Inventory Management System, with Electronic Tracking

Purpose:

To establish and maintain a comprehensive inventory management system with electronic tracking.

Definitions:

Stock Keeping Units (SKUs) - a product identification code assigned to each product for tracking purposes

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Inventory Manager (IM) - to enter information about all products into the Point-of-Sale system as they are received at the dispensary; to provide electronic reports on a daily, weekly, and monthly basis for all products sold and in stock

General Manager (GM) - to source and contract with a comprehensive Point-of-Sale system provider with rigorous standards for electronic tracking, meeting all state and local requirements; to implement and supervise this policy; train staff on the operation of the Point-of-Sale electronic tracking

system; to track the sales of each product in the POS system on a daily basis

Chief Finance Officer (CFO) - to assist the GM with sourcing a comprehensive Point-of-Sale system provider with rigorous standards for electronic tracking, meeting all state and local requirements

Cannabis Service Specialist (CSS) - to enter all sales into the Point-of-Sale system

Detailed Procedures:

1. Establishing and maintaining a comprehensive Point-of-Sale (POS) system with electronic tracking
 - a. Under the direction of the Executive Director (ED), the General Manager (GM) or our Chief Finance Officer (CFO) will source and contract with a comprehensive POS system provider offering rigorous standards for electronic tracking. The CFO and GM will ensure that the system meets all state and local requirements and keep up to date with any laws as they change so that the system may be adjusted or updated.
 - b. The CFO will train the Inventory Manager (IM), General Manager (GM), and Cannabis Service Specialist (CSS) on the proper use of the POS system.
 - c. The IM will produce regular inventory reports. The GM, and CFO will review daily, weekly, and monthly reports of sales and inventory, ensuring that all products are being tracked properly.
 - d. The CFO, IM, and GM will stay up to date with all POS system updates and improvements, retraining staff as needed.
2. Operating a comprehensive POS system with electronic tracking
 - a. The IM will enter the weight, count, and other identifying information about all products into the POS system as the products are received at the dispensary.
 - b. The IS will establish Stock Keeping Unit (SKU) numbers for all dispensary products.

- c. The IM will enter the SKUs into the POS system along with product's weight or count.
- d. The IM will enter into the POS system the weights and counts of each product distributed to the retail vending station at the beginning and end of each day.
- e. The IM will provide daily and weekly reports of all medical cannabis flowers, concentrates, packaged products, and clones onsite to the GM and CFO when needed.
- f. The GM, and CFO will oversee monthly inventories of all dispensary products, ensuring that they are properly entered into the POS system.
- g. The CSS will enter all sales into the electronic POS system as instructed by the GM.

Attachments:

POS system information

Procedure #:	Policy Name: Safe Storage of Cannabis; Vault Use and Access	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Safe Storage of Cannabis; Vault Use and Access

Purpose:

To store all medical cannabis flowers and products in a safe, verifiable, and efficient manner throughout the business day and upon closing the dispensary.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Purchaser (PA) - to receive cannabis deliveries and store products in a safe manner

General Manager (GM) - to implement and supervise this policy, in coordination with the Purchaser and Security; to ensure the security of all medical marijuana products stored during the business day and after hours; to keep all locks and security systems in good working order and ensure they are used properly;

oversee the placement of all marijuana products from the floor into the vault upon the dispensary's closure

Assistant General Manager (AGM) - to oversee the placement of all marijuana products from the floor into the vault upon the dispensary's closure

Shift Supervisor (SSUP) - to oversee the placement of all marijuana products from the floor into the vault upon the dispensary's closure

Security (SEC) - to assist in designing and maintaining security systems; to establish and maintain a safety zone surrounding and within the dispensary for product storage

Detailed Procedures:

1. Design and maintenance of storage security systems
 - a. Under the direction of the Executive Director (ED), the General Manager (GM), working with Security (SEC), will design and source a vault and security system, including cameras, locks, and access doors.
 - b. The ED will write a security protocol for storage and train the Purchaser (PA), (GM), and staff on security procedures for storage.
 - c. The PA and GM will manage day-to-day operations of the storage security plan. They will routinely inspect all locks and security systems to ensure equipment is in good working order and being used properly.
2. Storage of medical cannabis products during the business day
 - a. The PA will properly store all cannabis products received in the storage vault.
 - b. The GM will be in charge of employee access to the product storage vault, allowing only authorized persons to enter for authorized withdrawals.
 - c. The GM and SEC will monitor cameras throughout the day to ensure no unauthorized persons are near the storage vault and that no one makes an unauthorized product withdrawal from the vault.
3. Storage of medical cannabis products after hours
 - a. The GM, Assistant General Manager (AGM), or Shift Supervisor (SSUP) will remove all medical marijuana products from the floor and dispensing areas, placing them into the vault upon the dispensary's closure.

b. The PA and SSUP will remove all medical marijuana products from the packaging area at the end of each shift, placing them in the vault for safe storage.

c. The GM, AGM, SSUP, or PA will lock the vault at the end of each business day, and he or she will open the vault at the beginning of each business day.

Attachments:

None

Procedure #:	Policy Name: Determination of Necessary Inventory Additions and Reductions	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Determination of Necessary Inventory Additions and Reductions

Purpose:

To determine necessary inventory additions and reductions based on patient needs, sales trends, projections, and available inventory.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Purchaser (PA) - to routinely analyze sales and inventory reports and, based on sales trends, projections, and knowledge of available products, determine which cannabis products to order and what inventory to reduce; to provide sales and inventory reports to the General Manager

General Manager (GM) - to implement and supervise this policy; provide information on member products request to the Purchaser

Cannabis Service Specialist (CSS) - to report to the General Manager product requests from patients and complaints about currently available products

Detailed Procedures:

1. Gathering data on cannabis products both in and out of stock

- a. The Purchaser (PA) will make daily, weekly, and monthly reports of current product inventory and sales available to the General Manager (GM) and Chief Finance Officer (CFO).
 - b. The PA will gather information about available cannabis products and make this information available to the COO/PM.
 - c. The (GM) will gather information from patients via direct contact and through Cannabis Service Specialist (CSS) about which products they would like to see in the dispensary, which products are working for patients, and which products are not.
 - d. The GM will suggest ordering products that might suit patients' needs to the PA. The GM will also suggest reducing inventory of products that do not meet patients' needs.
2. Analyzing sales trends and making projections
- a. The CFO will review data about inventory, availability, and efficacy of cannabis products received from the GM and PA, then will make decisions based on that data.
 - b. The GM and/or CFO will direct the PA to order needed products.
 - c. The ED, with the assistance of the PA and GM, will devise and implement methods of reducing inventory of overstocked products (e.g., offering specials, returning products to manufacturers, etc.).

Attachments:

None

Procedure #:	Policy Name: Paying Distributors for Cannabis Products	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Paying Distributors for Cannabis Products

Purpose:

To pay Distributors for cannabis products in an accurate, efficient, verifiable, and safe manner.

Definitions:

Point of Sale (POS) - a System for tracking patient sales, accounting information, and inventory stock.

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy

Purchaser(PA) - to pay Patient Providers for products in accordance with this policy

Chief Finance Officer (CFO) - to tally and reconcile all cash-out payments at the beginning or end of each workday; to reconcile each day's total cash on hand with the sales data from the Inventory Management System

Distributor (DIST) - to work with the Purchaser to identify dates for payments and drop offs; to be accommodating to the needs of the company and payment schedule

Detailed Procedures:

1. Accepting product, sending for testing, and preparing invoices

a. Under the direction of the Executive Director (ED), and with supervision from the General Manager (GM, the Purchaser (PA) will accept or prepare an invoice for the agreed-upon price for all cannabis products received at the dispensary.

b. The PA will inform Distributors (DIST) that the price is contingent upon test results, and that the dispensary maintains the right of refusal or price adjustment upon receipt of results.

c. The PA will secure the signature of the DIST on the invoice, along with their initialing of the agreement regarding test results.

d. The PA will record the product in the Point-of-Sale (POS) system on the receiving sheet and will place the product in the vault pending test results along with the PP's name, the weight or amount received, and the price agreed upon.

e. The DIST will be instructed that test results will be available in 7 - 10 days, and that payment terms for consignment start when the product becomes shelf ready. From the time the test results arrive to the time of payment will be 30 days, unless the product sells slowly. Then the time terms must be longer.

f. The PA will provide weekly reports on products received to the GM and Financial Director (FD).

2. Paying DIST

a. The PA will verify that the testing results on all products are acceptable. The PA will adjust the price or return product if testing shows it to be of lesser or inadequate quality.

b. The PA will prepare a cash-out slip for the amount to be paid, indicating whether it is to be paid by cash or check. They will remove the proper amount of cash from the safe or requisition a check for the amount owed from the Office Administrator (ADMIN). The PA will record the check number on the invoice or indicate that it was paid in cash.

c. The PA will count any cash in front of the DIST and in view of the security camera in the Procurement office.

- d. The PA will witness the DIST signature on the invoice, denoting that the amount has been paid.
- e. The PA will attach a copy of the invoice to the cash-out slip and give it to the Chief Finance Officer (CFO) for reconciliation and will provide copy if needed.
- f. The PA or their designee will record the payment in the bookkeeping system, and he or she will provide weekly reports on payments made to the General Manager (GM).

Attachments:

None

Procedure #:	Policy Name: Product Handling	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Product Handling

Purpose:

To handle cannabis products in a way that ensures their integrity, for maximum benefit and safety to the patient.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM - to implement and supervise this policy; to train and oversee the Purchasing Agent, and Patient Service Clerks on this policy

Inventory Manager (IM) to enforce this policy by overseeing the packaging and production departments

Cannabis Service Specialist (CSS) - to properly handle all products per this procedure

Detailed Procedures:

1. Establishing and promulgating product-handling procedures

a. Under the direction of the Executive Director (ED), the Inventory Specialist will establish and enforce all product-handling protocols, including the following:

The use of gloves, lab coats, hairnets, beard nets, and face guards by Cannabis Service Specialist (CSS) when handling, packaging, or manufacturing products.

The use of gentle techniques so as not to crush flowers or damage trichomes on cannabis medicines when weighing, dispensing, manufacturing, or packaging them.

b. The General Manager (GM) will develop techniques for minimizing damages to cannabis products caused by light and heat.

Attachments:

None

Procedure #:	Policy Name: Preventing the Deterioration of Cannabis Goods	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Preventing the Deterioration of Cannabis Goods

Purpose:

Sets forth the process for preventing the deterioration of cannabis goods

Definitions:

None

Scope:

All cannabis goods

Responsibilities

Executive Director (ED) - to establish and administrate this mandate

General Manager (GM) - to implement and supervise this policy

Inventory Manager (IM) - to execute this policy

Purchaser (PA) - to assist the Purchaser (PA) in executing this policy

Detailed Procedures:

1. Preventing the deterioration of cannabis goods
 - a. Under direction from the Executive Director (ED), the General Manager (GM), with assistance from the Inventory Manager (IM), will establish protocols and processes to ensure that all cannabis goods do not deteriorate prior to sale.
 - b. The IM, Purchaser (PA), or their designee receiving cannabis goods, will ensure that all cannabis goods received are clearly marked with their born on or expiration date if available.
 - c. The IM and the PA will ensure that NorStar Pharmaceuticals only orders cannabis goods in amounts that we can sell through before product deterioration occurs, based on past sales census data.
 - d. The IM will ensure that any cannabis goods allowed to expire will be removed from the sales floor, vaults and storage space(s) and put into the NorStar Pharmaceuticals waste management protocol in accordance with current state and local laws.

Attachments:

NorStar Pharmaceuticals Waste Management Plan

Section 26013, Business and Professions Code. Reference:
Sections 26010, 26012, 26110 and 26130, Business and Professions
Code.

Procedure #:	Policy Name: Returns and Destruction of Cannabis Goods	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Returns and Destruction of Cannabis Goods

Purpose:

To establish and implement a safe and secure handling processes
for returns and destruction of purchased cannabis goods in
accordance with state and Local regulations

Definitions:

None

Scope:

Facility Wide

Responsibilities:

Executive Director(ED) - to create and supervise this policy

Chief Operations Officer (COO) - to implement this policy

General Manager (GM) - to oversee and execute this policy and
ensure required track and trace reporting is executed

Purchasing Agent (PA) - to assist the General Manager in
operational and regulatory compliance

Detailed Procedures:

1. Returns and destruction of purchased cannabis goods
 - a. With supervision from the ED, the COO, or the GM, the PA, or their designee, receiving a cannabis good(s) found to be defective, will inform the GM that the product is defective and ensure that it is removed from active inventory and initiate return and destruction protocols.

b. With supervision from the ED the COO, or the GM, any staff member that discovers a defective cannabis good(s) will inform the GM that the product is defective.

c. The GM, or their designee, shall ensure that the defective good(s) is removed from active inventory and initiate return and destruction protocols

d. No cannabis goods shall be disposed of as cannabis waste pursuant to this policy unless the cannabis goods have been removed from their packaging and rendered unrecognizable and unusable.

2. Licensee purchasing from another licensee

a. If NorStar Pharmaceuticals, as a licensee, discovers that a manufactured cannabis good that was purchased from another licensee is defective, as the purchasing licensee, NorStar Pharmaceuticals may return the cannabis good to the selling licensee only in exchange for a non-defective version of the same type of cannabis good or in exchange for a cannabis good of equal value. (b) Except as provided in subsection (a) of Article 7 § 5053, a licensee shall not return cannabis goods purchased from another licensee.

Attachments:

Section 26013, Business and Professions Code. Reference: Section 26070, Business and Professions Code.

Procedure #:	Policy Name: Process for performing inventory reconciliation and ensuring inventory records are accurate	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Process for performing inventory reconciliation and ensuring inventory records are accurate

Purpose:

Sets forth the process inventory reconciliation and ensuring inventory records are accurate

Definitions:

POS: Point of Sale

Scope:

All Cannabis product inventory and records

Responsibilities

Executive Director (ED) - to create and establish this mandate

General Manager (GM) - to implement and supervise this policy

Chief Finance Officer (CFO) - will create reports regarding inventory, finances, and discrepancies under the direction of the Executive Director; to identify issues with help from the Inventory Manager.

Inventory Manager (IM) - to supervise the daily product reports from the Point of Sale system and report any discrepancies to the General Manager and Chief Finance Officer

Purchaser (PA) - to ensure Transportation of cannabis good are arranged by the Licensed Distributor or other Transportation arrangements are contracted for each product delivery

Cannabis Service Specialist (CSS) - to assist with monthly inventory counts

Detailed Procedures:

1. Discovering inventory discrepancies
 - a. Under direction from the Executive Director (ED), the Chief Finance Officer (CFO) will generate a daily report of sales data at the beginning of each day and forward that data to the Inventory Manager (IM).
 - b. The General Manager (GM) and Cannabis Service Specialist (CSS) will perform product counts of all cannabis products at least every 14 days and reconcile those counts with the inventory counts in the Inventory Management System.
 - c. The GM and CSS will report any discrepancies to the Purchaser (PA) and the (ED).
 - d. The IM will use the daily sales report generated by the (CFO), the 14-day physical inventory counts, and any discrepancies reported by the (GM) or (CSS) to do spot checks on inventory counts for accuracy.
2. Maintaining customer sales records

- a. The (GM), with assistance from the (IM), shall maintain an accurate record of sale for every sale made to a customer.
 - b. A record of a cannabis goods sale shall contain the following information: The first name and employee number of the retailer employee who processed the sale; the first name of the customer and a retailer assigned customer number for the person who made the purchase; the date and time of the transaction; a list of all the cannabis goods purchased, including the quantity purchased; and the total amount paid for the sale including the individual prices paid for each cannabis good purchased and any amounts paid for taxes.
 - c. This data is to be kept and used for inventory discrepancy reconciliation.
3. Reconciling and reporting inventory discrepancies
- a. The (IM), with assistance from the (PA), will reconcile any inventory discrepancies found.
 - b. The (IM), the (PA), or their designee, will do a physical count of the product inventory in question and compare that count with the current 'should have' count found in the POS system.
 - c. The (IM) and the (PA) will use the original shipping manifest, with lot or batch numbers and product delivery date(s), to verify what and when the products in question were delivered.
 - d. The (IM) and the (PA) will follow the original shipment from the time it was received and entered in inventory until the time of sale and reconcile the discrepancy by tracing the product, by lot or batch number, until it was sold to a retail customer.
 - e. Any discrepancies found in entering product into inventory, or being moved from inventory to active stock, that are discovered will be corrected in the inventory count and reported in Track and Trace by the (IM).
 - f. The IM will update the POS system with the newly found accurate inventory count.
 - g. Discrepancies of \$5,000.00, or 2% of the average monthly sales (as calculated from the previous six months of sales), whichever is less, shall be reported to the Bureau of Cannabis Control and law enforcement within 24 hours.
 - h. The (GM) will maintain accurate inventory reconciliation records and make them available to the Bureau of Cannabis Control upon request.
 - i. Any theft, diversion or loss found during inventory reconciliation shall be reported to the Bureau of

Cannabis Control and law enforcement in accordance with state and local law within 24 hours.

Attachments:

Section 26013, Business and Professions Code. Reference:
Sections 26013, 26069, 26160 and 26161, Business and Professions Code.

Procedure #:	Policy Name: Safe Storage and Recordkeeping of Cannabis Goods	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Safe Storage and Recordkeeping of Cannabis Goods

Purpose:

Sets forth the correct process storage and recordkeeping of cannabis goods delivered

Definitions:

Scope:

All Cannabis goods in the Vault and Safe(s)

Responsibilities

Executive Director (ED) - to create and establish this mandate

General Manager (GM) - to implement and supervise this policy, lock the safe at the end of the night

Assistant General Manager (AGM) - to lock up the safe at the end of the night

Chief Finance Officer (CFO) - supervise and oversee electronic recordkeeping

Purchaser (PA) – to ensure the secure storage and recordkeeping of cannabis goods upon delivery; to monitor all access to the safe storage room during the day; to unlock the storage room at the beginning of the day

Security (SEC) – to monitor all access to the safe-storage room during the day via video security system

Cannabis Service Specialist (CSS)– to enter all sales into the Point-of-Sale system

Detailed Procedures:

1. Secure storage of cannabis products upon delivery and throughout the day and during opening and closing
 - a. The Executive Director (ED) will create and supervise this policy.
 - b. The General Manager (GM) will train the Purchaser (PA) and Assistant General Manager (AGM) on safe storage.
 - c. The (GM) and (PA), will oversee day-to-day operations to ensure proper procedure is followed.
 - d. The (GM) will set up and maintain security cameras, locks, and alarms in the safe storage room/vault locations, in coordination with the Security (SEC) and other vendors.
 - e. The (PA) and (GM) will monitor all access to the safe storage room during the day in conjunction with Security (SEC).
 - f. The (PA) will unlock the storage room at the beginning of the day and the Closing Supervisor, (GM), or (AGM) will lock it at the end of the day.
 - g. The (PA), (GM), or Supervisor will store cannabis products in the safe storage room and vault locations as they are received, in line with this policy.
 - h. (SEC) will monitor all access to the safe storage room and vault locations during the day (when necessary) via video security system, as directed by the (GM).
2. Inventory Management with electronic recordkeeping
 - a. Under the direction of the (ED), the (GM) or our Chief Finance Officer (CFO) will source and contract with a comprehensive POS system provider offering rigorous standards for electronic recordkeeping including Track and Trace. The CFO and GM will ensure that the system meets all state and local requirements, and keep up to date with any laws as they change so that the system may be adjusted or updated.

- b. The CFO will train the Inventory Manager (IM), General Manager (GM), and Cannabis Service Specialist (CSS) on the proper use of the POS system.
 - c. The IM will produce regular inventory reports. The GM, and CFO will review daily, weekly, and monthly reports of sales and inventory, ensuring that all products are being tracked properly.
 - d. The CFO, IM, and GM will stay up to date with all POS system updates and improvements, retraining staff as needed.
3. Operating a comprehensive POS system with electronic tracking
- a. The IM will enter a description of the cannabis goods with enough detail to easily identify the batch; the best-by, sell-by, or expiration date of the batch, if any; the weight of or quantity of units in the batch; and other identifying information, including distributor license number and supplier license number, about all products into the POS system as the products are received at the dispensary.
 - b. The IM will establish Stock Keeping Unit (SKU) numbers for all dispensary products.
 - c. The IM will enter the SKUs into the POS system along with product's weight or count and batch number(s).
 - d. The IM will enter into the POS system the weights and counts of each product distributed to the retail vending station at the beginning and end of each day.
 - e. The IM will provide daily and weekly reports of all medical cannabis flowers, concentrates, packaged products, and clones onsite to the GM and CFO when needed.
 - f. The GM, and CFO will oversee monthly inventories of all dispensary products, ensuring that they are properly entered into the POS system.
 - g. The PSC will enter all sales into the electronic POS system as instructed by the GM.

Attachments:

POS system information

Section 26013, Business and Professions Code. Reference: Sections 26110 and 26120, Business and Professions Code.

NorStar Pharmaceuticals Management and Operations Manual

Section Three: Patient and Caregiver Registration and Recordkeeping

Procedure #:	Policy Name: Age Limits on Membership	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Age Limits on Membership

Purpose:

To ensure that no patient under the age of 18 years old or customers under 21 years old is permitted inside the premises.

Definitions:

None

Scope:

Front Door and Reception

Responsibilities:

Executive Director (ED) - to establish and supervise this mandated age limit

General Manager (GM) - implement this policy and to supervise ongoing adherence to it; supervise and train staff and receptionists, giving them the tools, resources, and knowledge to identify and locate date of birth on valid, government-issued identification

Reception (REC) - to ensure all patients entering the premises have physical, valid, government-issued identification stating that they are at least 18 years old, or are accompanied by their parent or legal guardian

Security (SEC) - to prevent underage patients from entering by checking identification at the door; to ensure that any underage patients exit the premises immediately upon discovery of a disqualified date of birth.

Detailed Procedures:

1. Establishing and implementing this policy
 - a. The Executive Director (ED) will create procedures to screen every person who enters the facility and grant access only to patients and caregivers over the age of 21 (patients must be 18). Patients under 18 will be denied access and their parent, guardian or caregiver will be allowed to obtain their medicine. Customers over 21 will be allowed in with proper identification verification by the Reception (REC).
 - b. The General Manager (GM) will implement this policy by developing a screening protocol for REC and will create a training program for the staff.
 - c. The GM will train staff and ensure that REC has all information necessary to fully screen members. The GM will supervise the REC, ensuring that each member receives proper approval before being allowed to enter the dispensary.
2. Intake of qualified patients and customers
 - a. The REC will inspect customer or patient-provided, valid, government-issued IDs in order to ascertain that the patient is over 18 or customer is over 21. If not, the REC will then allow the underage persons is primary caregiver to obtain their medicine.
 - b. If the person is not qualified to enter, the REC will ask them to leave the facility, with the polite accompaniment of SEC.
 - c. SEC will assist with asking non-verified patients to leave if necessary.

Attachments:

None

Procedure #:	Policy Name: Membership Limited to Customers, Patients and Caregivers	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Membership Limited to Customers, Patients and Caregivers

Purpose:

To ensure all patients entering premises are 18 and over (21 for Adult Use) or are verified medical marijuana patients or caregivers for verified patients.

Definitions:

None

Scope:

Front Door, Reception Area, and Administration

Responsibilities:

Executive Director (ED) - to establish and supervise procedures that ensure only patients and caregivers are allowed access to the facility

General Manager (GM) - to supervise and train staff and Receptionists, giving them the tools, resources, and knowledge to identify and locate the date of birth on valid, government-issued identification

Assistant General Manager (AGM) - to ensure all staff are trained and have the knowledge to verify a current, state-approved, medical marijuana recommendation and to retain proof of such for each member

Office Administrator (ADMIN) - to aid in verifying that all caregivers are qualified; to maintain all physical and digital records collected from members

Reception (REC) -to verify patients have a valid and current doctor's recommendation for use of medical marijuana; to verify

all caregivers are qualified; and to collect the proper records for each member

Security (SEC) - to assist REC by ensuring only valid patients are allowed in the dispensary.

Detailed Procedures:

1. Establishing a policy to ensure only patients or caregivers 18 (21 for Adult Use) and over gain access to the dispensary.

- a. The Executive Director (ED) will establish and supervise procedures that ensure only patients or caregivers over 18 (21 for Adult Use) are allowed access to the facility.

- b. This policy will include verifying that each person carries either a valid identification card or doctor's recommendation for medical marijuana from a licensed physician.

2. Implementing the policy to ensure that qualified persons gain access to the dispensary

- a. The General Manager (PM) will implement this policy and supervise the staff responsible for ensuring adherence.

- b. For patient members, the policy will be as follows:

Each member must have either a county-approved medical marijuana card, a copy of their original doctor's recommendation, or an equivalent card issued by a licensed physician.

Before a new member is allowed to access the dispensary, the Receptionist (REC) will call the doctor's office or use the doctor's online verification system to check that the recommendation is valid.

The REC will also check Medical Board records to verify that the doctor is licensed in California, if necessary.

Members will only be allowed to complete registration and enter the dispensary after meeting both qualifications.

- c. For caregiver members, the policy will be as follows:

The patient member they represent must be with them on the first visit to verify that each caregiver is an

actively giving care, and that each is qualified to purchase medicine for the patient member they represent.

If patient is too ill to physically come in, the patient's caregiver must provide their patient's ID and documents in addition to their own and will need to fill out our membership form on their behalf.

The patient must register first, and be fully verified, then the caregiver's documentation will be verified and read over to ensure accuracy.

Once the designated caregiver is registered and has filled out the designation form, they will be able to acquire medicine for the patient.

Patients can revoke a caregiver's rights at any time, by phone, email, or in writing, and NorStar Pharmaceuticals will immediately revoke their access to the facility.

3. For Adult Use Customers the policy will be as follows:
 - a. Each customer must have current valid identification with proof of age before completing registration.
4. Staff training
 - a. Under the supervision of the GM, the Assistant General Manager (AGM) will ensure that all staff are trained in and knowledgeable about these procedures and state regulations, and that they have the knowledge to identify and locate a patient's name and dates to verify a current, state-approved, medical marijuana recommendation, which should be signed and stamped by a physician licensed in the State of California.
 - b. The AGM will ensure that all staff are trained to verify the licenses of doctors when necessary, using the State Medical Board's website.
5. Verifying patient recommendations and doctor's licenses
 - a. The REC will require that each patient member register when they first join the dispensary. The REC will collect a copy of the member's doctor's recommendation for medical marijuana and information about how to contact the doctor for verification. He or she will also collect a valid, government-issued identification (ID) from each member.

b. The REC will verify each doctor's recommendation by phone or by checking online. No member will be allowed to access the dispensary until their doctor's recommendation is validated.

c. For recordkeeping, the dispensary will maintain records of all patients and caregivers using only the ID card number issued by the county or its agent, or a copy of the written recommendation from a physician or doctor of osteopathy stating the patient's need for medical cannabis. The ED will ensure this policy is in place, and the COO will implement it with the assistance of the AGM and REC.

6. Registering and verifying caregivers

a. The REC will require each qualified caregiver to register before entering the dispensary. On the first visit, the patient and caregiver must arrive together, and the patient's registration must be completed before their caregiver can register. In cases where the patient is too ill to come in or has been hospitalized, the patient's caregiver must provide their patient's documentation along with their own for the registration process. Management's approval is required in these situations.

b. The GM will ensure that the REC has caregiver registration forms available at all times, so patient members can designate their caregiver as a member of NorStar Pharmaceuticals and able to pick up their medicines if needed.

c. Caregivers will be required to provide a valid ID and will have to fill out a registration form agreeing to meet all the rules of the collective.

d. Patients can revoke a caregiver's status at any time by phoning, emailing, or notifying the collective in person. The REC or Office Administrator (OA) can deactivate a caregiver's membership, and they should do so immediately upon notification that the caregiver/patient relationship has terminated.

7. Screening current and potential members at the front door

a. The SEC will direct all patients to the reception area and ask them to present their valid government-issued ID and a valid doctor's recommendation.

b. If a potential member does not have either of these documents, the SEC will deny them entry.

c. NorStar Pharmaceuticals will provide information about medical marijuana and the law and will recommend doctor's offices and online services for obtaining their doctor's recommendation.

8. Maintaining patient and caregiver records

a. At registration, the REC will either photocopy or scan each member's doctor recommendation, government-issued ID, and, if applicable, caregiver agreements.

b. The Office Administrator (ADMIN) is responsible for maintaining all physical and digital records collected from members.

Attachments:

None

Procedure #:	Policy Name: Entering the Facility	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Entering the Facility

Purpose:

To ensure only qualified and verified patients and caregivers are allowed admittance into facility for the receipt of medical marijuana.

Definitions:

None

Scope:

Front Door and Reception Area

Responsibilities:

Executive Director (ED) - to ensure the dispensary's floor plan has separate admittance and dispensing areas; to create systems to register and verify members

General Manager (GM) - to implement and supervise registration and verification procedures

Reception (REC) - to ensure only qualified patients are allowed into the dispensing area

Security (SEC) - to verify that each person entering the facility is a patient or caregiver

Detailed Procedures:

1. Accepting qualified patients and caregivers onto premises

a. The Executive Director (ED) and General Manager (GM) will ensure that the dispensary only allows entrance to verified members. This includes having a lobby reception for members, which does not allow direct access to the secured dispensary room until the person has been registered and verified. The GM will ensure that the entrance to the dispensary is locked at all times, with buzz-in access, and that there is a security camera on the door allowing the maximum-angle view of the exterior entrance.

b. Reception (REC) will check in each person who enters the facility. Each member will have to show a government-issued identification (ID) and a doctor's recommendation or county-issued medical cannabis ID card to gain entry. If the person is not yet registered, the REC will register them and verify the validity of the doctor's recommendation.

2. Buzzing members into the dispensary

a. Upon membership verification, the REC will permit qualified patients and caregivers into dispensing area, via a "buzz-in" electronic entry system.

b. Security (SEC) is to serve as a secondary line of defense, ensuring only qualified and approved members enter the dispensing area. They must stop any person attempting to barge past the reception desk or enter surreptitiously with a registered member.

Attachments:

None

Procedure #:	Policy Name: Mandatory Information Given to Members	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Mandatory Information Given to Members

Purpose:

To educate new members about the laws, regulations, facility rules, and etiquette required.

Definitions:

None

Scope:

Reception Area

Responsibilities:

Executive Director (ED) - to determine what types of documentation and information will be presented to members; to ensure that all members' documentation is current, legal, and valid

General Manager (GM) - to locate or create the best information possible for members, including building rules and guidelines and instructional or educational literature

Office Administrator (ADMIN) - to ensure all information is complete, organized, and ready for distribution to members, either digitally or in hard copy form

Reception (REC) - to distribute information to all incoming members

Detailed Procedures:

1. Distribution of mandatory information
 - a. The Executive Director (ED) and General Manager (GM) will work together to create accurate information about the medical cannabis rules and regulations governing use and consumption within the city. They will also create recommendations on sensible cannabis use and etiquette.
 - b. The Office Administrator (ADMIN) will ensure all required documents and literature are organized in a neat and presentable manner for distribution to all incoming patients and caregivers. This information must be updated and redistributed as needed.
 - c. REC will tell patients about the various documentation and information we have on hand and will encourage them to take this information with them.

Attachments:

None

Procedure #:	Policy Name: Maintenance and Storage of Membership Records	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintenance and Storage of Membership Records

Purpose:

To ensure the proper filing and storage of membership records for the required length of time.

Definitions:

None

Scope:

Reception and Administration

Responsibilities:

Executive Director (ED) - to establish and supervise a recordkeeping system

General Manager (GM) - to implement the recordkeeping system

Office Administrator (ADMIN) - to ensure the proper filing, maintenance, and destruction of membership records

Reception (REC) - to electronically file and label membership records

Detailed Procedures:

1. Maintenance of patient membership records and documents
 - a. The Executive Director (ED) will design a recordkeeping system to maximize the confidentiality of members. Rather than storing patient's private information, the collective will store member data using the identification (ID) number found on the member's county-issued card. If no card is available, the collective will use the highest level of digital and hard-copy storage security to keep copies of any written recommendations from a physician or doctor of osteopathy stating the need for medical cannabis.

b. The General Manager (GM) will implement and supervise this policy, designing systems for digital and paper storage.

c. The Office Administrator (ADMIN) will ensure that the proper management of filing, storage, and safekeeping of membership records occurs. Patient membership records will be reviewed and destroyed at least every 12 months or upon expiration of their verification.

d. The Reception (REC) will electronically file Membership Agreement Forms, which are filed by the patient's first and last name and can be searched using a scan of their valid government-issued ID.

Attachments:

None

Procedure #:	Policy Name: Confidentiality of Information	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Confidentiality of Information

Purpose:
To check patients and caregivers in and maintain their records in a manner that ensures confidentiality of their information.

Definitions:
Point-of-Sale (POS) - a system for tracking sales, inventory and patient accounts.

Scope:
Facility-wide

Responsibilities:
Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy; to train Dispensary Patient Consultants and Receptionists on procedures to ensure confidentiality; to oversee day-to-day operations and ensure procedures are followed

Assistant General Manager (AGM) - to assist the General Manager (GM) overseeing day-to-day operations

Director of Clinical Services (DCS) - to conduct patient consultations upon request

Reception (REC) - to register or verify patients and caregivers; to maintain records according to confidentiality standards and practices

Patient Service Clerk (PSC) - to serve patients and caregivers; to maintain records according to confidentiality standards and practices

Security (SEC) - to serve patients and caregivers according to confidentiality standards and practices

Detailed Procedures:

1. Creating and implementing a confidentiality policy
 - a. The Executive Director (ED) will create policies and supervise related procedures to ensure the dispensary maintains member confidentiality.
 - b. The General Manager (GM), with the assistance of the Assistant General Manager (AGM), will oversee day-to-day operations to ensure that confidentiality procedures are carried out facility-wide
2. Training staff on confidentiality policies and supervising them
 - a. The GM, with the assistance of the AGM, will implement training for Reception (REC), Patient Service Clerks (PSC), and Security (SEC) on dispensary procedures to ensure patient confidentiality, including but not limited to as follows:

Dispensary policy of not sharing patient or caregiver records, in addition to a means of informing patients and caregivers of this policy, which includes the security of servers and data backup systems.

Procedures for shredding patient records after the necessary information has been entered into the Point-of-Sale (POS) system or the patient database.

Using discretion when calling a patient to the desk or vendor area, or when they enter or exit the facility, which includes not calling their name or using their last name.

Not asking for a patient's medical condition or entering their condition into the database, unless the patient requests a consultation with the Director of Clinical Services (DCS) to discuss said condition.

Attachments:

None

Procedure #:	Policy Name: Ensuring the Integrity of Doctor Recommendations	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Ensuring the Integrity of Doctor Recommendations

Purpose:

To ensure the integrity of doctor recommendations presented by patients and caregivers, in keeping with state and local law.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy, in coordination with the Assistant General Manager (AGM); train staff on this policy and oversee day-to-day operations; to communicate information about any banned or suspect doctor(s) to staff along the with the policy for communicating that information to patients

Assistant General Manager (AGM) - to review doctor recommendations that are flagged as potentially noncompliant; to assist the General Manager in establishing the policy and about acceptance or non-acceptance.

Reception (REC) - to implement this policy and report any potential abuses to the General Manager

Cannabis Service Specialist (CSS) - to implement this policy and report any potential abuses to the General Manager

Detailed Procedures:

1. Establishing and implementing policies to ensure the integrity of physician recommendations

a. The Executive Director (ED), with the assistance of the General Manager (GM), will establish and communicate to staff policies on acceptance of physician recommendations for medical cannabis, in compliance with California Business and Professions Code Section 2220.05 Acceptable recommendations include ones that have been verified by the doctor or online verification website. Non-acceptable recommendations include those that the Receptionist (REC) is unable to verify, or one that does not have the correct information, including recommendation, date, doctor's name and signature.

b. The GM, with the assistance of the Office Administrator (ADMIN), will include in the Customer Membership Agreement and the Patient Membership Agreement, which is to be signed by all new and renewing dispensary members, checkboxes for the following phrases:

"I have a medical reason for using cannabis."

"My recommending physician has taken responsibility for an aspect of my medical care, treatment, diagnosis, counseling, or referral."

"My recommending physician conducted a medical examination before issuing my recommendation."

c. The GM, with assistance from the ADMIN, will establish and implement policies for verifying physicians' licenses, reviewing doctor recommendations, and allowing or disallowing recommendations from physicians based on state law and best practices.

2. Verifying a doctor's licensure and "attending physician" status

a. Upon presentation of a doctor's recommendation by a patient or caregiver, the REC will verify the doctor's license (MD or DO) is current and complete at the California Medical Board website if unable to verify online or speak with the doctor directly. If REC is not familiar with a doctor's office or physician, they will then verify their license at <http://www.mbc.ca.gov/>.

b. The REC will verify that the patient has fully completed and signed the Membership Code of Conduct.

c. The REC will report to the GM about any potentially noncompliance issues that could lead to patients being banned or a doctor's recommendations that may not be accepted. This information will then be reported to the ED for review. It includes:

Physicians who appear to be repeating acts of clearly excessive recommending of cannabis for medical purposes, or repeated acts of recommending without a good faith prior exam (e.g., excessive numbers of recommendations, patients reporting that notes were issued without receiving an exam, etc.).

Physicians who may be recommending medical cannabis without a medical reason for the recommendation, based on statements made by a patient.

Physicians who offer remuneration to the dispensary in exchange for referrals.

3. Reviewing doctor records and determining the integrity of recommendations and allowing or disallowing recommendations

a. ADMIN will review, when necessary, the number of physician recommendations presented from all doctor. He or she will flag all recommendations from doctors who appear to be handing out excessive approvals. These will be reported to the ED and GM for investigating.

b. The ED and GM will investigate any reports from REC or Patient Service Clerks (PSCs) about doctors who may not be conducting a good-faith prior exam or who are issuing recommendations without a medical reason.

c. The ED and GM will determine whether a physician's recommendation will be accepted at the dispensary and will communicate this information to the REC.

d. If a physician's recommendation is no longer accepted, the REC will inform the member that they must secure a new recommendation in order to maintain their membership status.

Attachments:

None

Procedure #:	Policy Name: Providing Wellness Services to Members	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Providing Wellness Services to Members

Purpose:

To create and supervise wellness programs to serve each member.

Definitions:

None

Scope:

Facility-wide and social media platforms

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy; to decide which services to offer; to hire providers to perform those services; assist with the scheduling of staff training sessions; to oversee the day-to-day operations of wellness programs

Director of Clinical Services (DCS)- to develop and update the webpage and monthly calendar to inform patients and caregivers of wellness services and programs; to announce services on all social-media platforms

Assistant General Manager (AGM) - to help oversee the day-to-day operations of wellness programs

Shift Supervisor (SSUP) - to help oversee the day-to-day operations of wellness programs

Reception (REC) - to alert the Director of Clinical Services when a new patient or one who needs service arrives; to assist with registering patients for wellness services and groups; to keep flyers and announcements about wellness services in stock and up-to-date at the dispensary's entrance

Cannabis Service Specialist (CSS) - to alert the General Manager when counseling on wellness services is needed

Detailed Procedures:

1. Developing and implementing wellness services and support groups for patients

- a. Under the supervision of the Executive Director (ED), the Director of Clinical Services (DCS), in coordination with the General Manager (GM) and after gathering input from dispensary members, will develop, implement, and publicize programs offering skill-building and wellness services for patients, such as the follows:

Massage, chiropractic, nutritional counseling, and Chinese-medicinal treatments

Support groups for seniors, veterans, cancer patients, AIDS patients, PTSD patients, pain-management patients, caregivers, and others

Classes on cultivating, curing, and preparing medicinal cannabis food.

- b. Classes will be publicized in print and posted around the facility by the GM or their designee, and the classes will be publicized on social media and the NorStar Pharmaceuticals website by the DCS.

2. Offering clinical services to patients and caregivers and gathering their input

- a. The GM will attempt to interact with all new patients and any patient in need of special attention. Reception (REC) will use a walkie-talkie to alert staff that a new patient is coming to the back. The Shift Supervisor (SSUP), Senior Staff Member, or Assistant General Manager (AGM) will greet the patient and give them a brief tour and overview of where everything is and how we operate.

- b. The REC or Cannabis Service Specialist (CSP) should alert the GM or DCS when a patient is in need of counseling or information about compassion or wellness programs or services. The GM should respond with information and assistance.

c. The GM will spend time in the dispensing area observing if a patient is agitated or in difficulty and approach them to offer their help.

d. The GM and CSS will communicate with patients about the results of their cannabis therapies and concerns about their cannabis use, in order to help them make successful choices.

Attachments:

None

Procedure #:	Policy Name: Check-in Procedures	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Check-in Procedures

Purpose:

To check customers, patients and caregivers into the dispensary in an efficient, accurate, and private manner.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement this policy and oversee day-to-day operations

Assistant General Manager (AGM) - to assist the General Manager (GM) with implementation

Reception (REC) - to check in new patients, verify existing ones, and update patient files as needed in keeping with this policy

Detailed Procedures:

1. To verify existing patients in keeping with this policy
 - a. Under the supervision of the Executive Director (ED), the General Manager (GM), along with the Assistant General Manager (AGM), will implement this policy.
 - b. Reception (REC) will greet each patient as they enter the dispensary, asking for their California driver's

license or identification (ID) card. All members must have a current, government-issued ID to register for membership.

c. The REC will look the patient's name up in the Point-of-Sale (POS) system to verify membership and current recommendation. The REC will notify any member whose recommendation is due to expire.

2. To update patient files in keeping with this policy

a. If, after greeting the patient, asking for their ID, and looking up their name in POS system, the REC finds that patient's recommendation has expired, he or she will inform the patient that they need to renew their recommendation with their doctor.

b. If they need a doctor, the REC will provide a list of doctors who provide recommendations.

c. When the patient returns with their updated recommendation, the REC will scan the recommendation and contact the doctor's office via telephone or website in order to verify it. He or she then will update the tracking system with the new expiration date.

d. If the doctor is unknown, the REC will verify the doctor's license using the California Medical Board website.

3. To sign up new patients in keeping with this policy

a. If, after asking for ID, the REC cannot verify the membership of a patient or caregiver, the REC will ask for their doctor's recommendation, scan it, and contact the doctor's office via telephone or website for verification.

b. If the doctor is unknown, the REC will verify their license using the California Medical Board website.

c. The REC will have the patient read, check each line of, and sign the Patient Membership Agreement and Code of Conduct.

d. The REC will update the POS system with the expiration date for the patient's recommendation and the date that they signed the Patient Membership Agreement and Code of Conduct.

4. To sign up caregivers in keeping with this policy

a. If a caregiver wishes register to pick up medicine for a patient, the REC will verify that the patient (who must be present) has a current doctor's recommendation.

b. If the caregiver has a Caregiver Agreement signed by the patient, the REC will scan the agreement. If the caregiver does not have an agreement, the REC will have them fill out a Caregiver Agreement, then direct both the caregiver and patient to sign the agreement. The REC will then scan it in the system.

c. The REC will have the caregiver fill out the Patient Membership Agreement and Code of Conduct.

d. The REC will create a file for the caregiver in the member-tracking system, providing the name of the patient, the date that that the agreement was signed, and the expiration date of the agreement.

Attachments:

None

NorStar Pharmaceuticals Management and Operations Manual

Section Four: Point of Sale Operations

Procedure #:	Policy Name: Restrictions on Entry to Dispensary Department	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Restrictions on Entry to Dispensary Department

Purpose:

To ensure only qualified customers medical marijuana patients and caregivers are permitted to enter the dispensing department.

Definitions:

None

Scope:

Reception and Dispensary Room

Responsibilities:

Executive Director (ED) - to create and implement a policy that assures only patients and caregivers are allowed access to the dispensary room

General Manager (GM) - to implement and train staff on this policy

Assistant General Manager (AGM) - to ensure the Receptionist is diligent in the admittance and verification of members

Reception (REC) - to verify that only qualified patients and caregivers are admitted to the dispensing area

Cannabis Service Specialist (CSS) - to verify each patient's identity and status as a currently registered member

Security (SEC) - to assist in verifying that only qualified patients and caregivers are admitted to the reception area and into the dispensing area from that point

Detailed Procedures:

1. Creating a policy to allow only customers, registered patients and caregivers into the dispensary room
 - a. The Executive Director (ED) will create and implement a policy to allow only customers, registered patients and caregivers into the dispensary room. This includes status verification at the time of registration, a recheck of their registration at each visit, and a system of only buzzing qualified people into the dispensary room from the reception area.
 - b. The ED will implement this policy, which includes creating a General Manager (GM)-lead staff training program.
2. Intake, verification, and granting access to qualified patients and caregivers
 - a. Under guidance from the GM and Assistant General Manager (AGM), Reception (REC) will verify that each person is a valid customer over 21 or a registered patient member, both during their initial registration and at each following visit.
 - b. REC should only allow those legally qualified and verified as Adult users 21 or over, current medical marijuana patients or caregivers to enter the dispensary room. Following verification, the REC will grant access to the dispensing area by way of electronic buzzer entry system.
 - c. If the person does not have a valid patient recommendation or they are not a valid and registered caregiver, they will be asked to leave the reception area by the REC. The person will be given information about how to become a legal patient or caregiver, and they also may be provided with general medical cannabis information. Security (SEC) may assist with handing out our events calendar and literature.
3. Rechecking a patient's status in dispensary room

a. Cannabis Service Specialist (CSS) will check the identification of each member at the dispensary counter in order to again verify each persons' status as a currently registered member. If there is an issue finding their account, they will ask the patient for their identification (ID)

b. If a person is found to have an expired card, they will be escorted from the dispensary by the PSCs and advised to get an updated card before returning. SEC may assist with asking members to leave, if necessary.

c. If a person with an expired card or without a valid card enters the dispensary due to staff error on the part of the REC, the GM or AGM should be notified, and the REC should be given a written or verbal warning about their violation of this policy by the GM. Repeat violations will be grounds for termination.

4. Guests and visitors

a. The ED will create a guest policy, stating that all other authorized visitors will remain in the designated outside waiting or parking areas. The General Manager (GM) will implement this policy.

b. SEC will monitor the outside waiting and parking areas to assure that guests and visitors do not create any nuisance crimes nor present a risk for diversion of cannabis or another serious crime. If SEC feels threatened, they will call 911 immediately and notify the ED or other senior facility staff that a problem exists.

Attachments:

None

Procedure #:	Policy Name: Ensure Proper Dosage and Use	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Ensure Proper Dosage and Use

Purpose:

To ensure that patient dosing is within a doctor's recommendations and that a qualified patient's physician is not recommending cannabis for less than medically appropriate reasons.

Definitions:

None

Scope:

Dispensing Area and Reception

Responsibilities:

General Manager (GM) - to ensure professionalism in staff in-regards to a product's effect and its description

Reception (REC) - to make inquiries regarding doctor recommendations

Cannabis Service Specialist (CSS) - to make recommendations of dosages and types of medicine

Detailed Procedures:

1. Ensuring appropriate doctor recommended product and use
 - a. The General Manager (GM) is to be diligent about all staff being professional at all times and using the correct medical dialog and vocabulary, discouraging all slang and recreational vocabulary per best practice standards.

b. Reception (REC) must make appropriate inquiries as to what a patient's doctor has recommended for them.

c. Cannabis Service Specialist (CSS) must make careful recommendations on the dosage and type of medicine based on a doctor's recommendation for a patient and the feedback provided by said patient.

Attachments:

None

Procedure #:	Policy Name: Supervision of Dispensary Operations	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Supervision of Dispensary Operations

Purpose:

To properly supervise dispensary operations in order to assure patient safety, maximum efficiency, solvency, and adherence to all state and local regulations.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create policies; to remain current with state and local regulations; to adjust policies as needed via the proper management team; to review inventory and finances and create monthly reports

Chief Finance Officer (CFO) - to supervise the management of the dispensary's inventory and finances

General Manager (GM) - to implement policies; to oversee day-to-day operations ensuring that the procedures are followed

Inventory Manager (IM) - to manage data entry

Office Administrator (ADMIN) - to manage data entry; to assist with reconciliations

Purchaser (PA) - to track all medical cannabis acquisitions and payments

Detailed Procedures:**1. Creating accounting and inventory management plans**

a. The Executive Director (ED) will develop inventory management and accounting plans for the dispensary. This will include using systems to track the cannabis from the moment it arrives into the facility, until it is provided to a patient member, and tracking all financial transactions from purchases to sales.

b. The Purchaser (PA), under the supervision of the General Manager (GM), will purchase medical cannabis from patient suppliers, entering all transactions onto inventory and financial tracking forms. These forms will be provided to the Inventory Manager (IM) and Office Administrator (ADMIN) each day, so that the data is properly input into the Point-of-Sale (POS) system and financial accounting software.

c. The Chief Finance Officer (CFO) will review all financial and inventory data weekly, investigating cash overages and shortages, reconciling data, and correcting and training staff as needed.

d. All financial information will be sent to a bookkeeper, who will review the information monthly and confirm all data is in balance. The ED will choose this bookkeeper, and will also hire an accountant for tax preparation.

e. The ED will review all financial data for the month, after it has been reconciled by the bookkeeper, in order to calculate taxes and improve the dispensary's operations. The ED will also review financial data weekly in order to catch errors and solve problems in their early stages. The ED or GM may hire outside financial consultants, as needed, to assist with this analysis or to help solve problems and improve systems. The ED is responsible for updating the inventory and financial management plans, whenever needed, with the assistance of the GM.

Attachments:

None

Procedure #:	Policy Name: Retail Sales Plan and Limits on Dispensing	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Retail sales plan and Limits on dispensing

Purpose:

Sets forth the correct procedure for retail sales and limits on dispensing

Definitions:

None

Scope:

Sales floor

Responsibilities

Executive Director (ED) - to establish and administrate this mandate

General Manager (GM) - to implement and supervise this mandate

Lead Cannabis Service Specialist (LCSS) - to supervise and assist the Patient Service Clerks for compliance

Cannabis Service Specialist (CSS) - to execute and ensure compliance

Reception (REC) - verify age and all qualifications of adult use and medicinal customers

Detailed Procedures:

1. Assuring secure retail sales

a. The Executive Director (ED) and General Manager (GM) are responsible for establishing and administering this mandate.

b. The Executive Director (ED) and General Manager (GM) will develop and maintain constant due diligence in all operations,

with supervision from the Lead Cannabis Service Specialist (LCSS), in order to verify that the organization is meeting its retail sales in a secure manner consistent with State and Local regulation.

2. Limited access areas

a. Executive Director (ED) and General Manager (GM) will establish limited-access areas and permit only authorized individuals to enter the retailer limited-access areas. Authorized individuals include individuals employed by the retailer as well as any outside vendors, contractors, or other individuals conducting business that requires access to the limited-access area.

b. An individual in the retailer limited-access area who is not employed by the retailer shall be escorted by the licensee's employees at all times within the retailer limited-access area.

c. An individual who enters the retailer limited-access areas shall be at least 21 years of age.

d. A retailer shall maintain a log of all authorized individuals who are not employees of the retailer that enter the retailer limited-access area. These logs shall be made available to the Bureau upon request.

e. A retailer shall not receive consideration or compensation for permitting an individual to enter the retailer limited-access area.

3. retail area

a. Individuals shall be granted access to the retail area only to purchase cannabis goods after the retailer or an employee of the retailer has verified that the individual is at least 21 years of age and has a valid proof of identification, or that the individual is at least 18 years of age, has valid proof of identification and a valid physician's recommendation for his or her self or for a person for whom he or she is a primary caregiver.

4. Acceptable forms of identification

a. 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 picture of the person.

b. A valid identification card issued to a member of the Armed Forces that includes a date of birth and a picture of the person.

c. A valid passport issued by the United States or by a foreign government.

d. A valid proof of identification must clearly indicate the age or birthdate of the individual.

5. Securing the retail area

a. The General Manager (GM), with assistance from the Senior Patient Service Clerk (SPSC), will ensure that the retailer or its employees shall be physically present in the retail area at all times when individuals who are not employees of the retailer are in the retail area.

6. Retail customers

a. the Executive Director (ED), with assistance from the General Manager (GM) and the Lead Cannabis Service Specialist (LCSS), will ensure that the Cannabis Service Specialist (CSS) only sell adult-use cannabis goods to individuals who are at least 21 years of age, and medicinal cannabis goods to individuals at least 18 years of age who possess a valid physician's recommendation for his or her self or a person for whom he or she is a primary caregiver.

b. (Reception REC) shall verify the identity and age, and physician's recommendation if applicable, of a customer as required by.

7. Cannabis goods display

a. The General Manager (GM), with assistance from the Lead Cannabis Service Specialist (LCSS) and Cannabis Service Specialist (CSS), shall ensure that cannabis goods for inspection and sale shall only be displayed in the retail area and that there will be no display of cannabis goods in a place where it is visible from outside the premises.

b. Cannabis goods may be removed from their packaging and placed in containers to allow for customer inspection. The containers shall not be readily accessible to customers without assistance of Patient Service Clerk (PSC) or other, authorized employee.

c. A container must be provided to the customer by the Cannabis Service Specialist (CSS) or other authorized employee, who shall remain with the customer at all times that the container is being inspected by the customer.

d. Turning your back for any reason is considered leaving the customer unattended with a cannabis product as it gives them unauthorized access.

c. The Executive Director (ED), with assistance from the General Manager (GM), will ensure that cannabis goods removed from their packaging for display shall not be sold, shall not be consumed, and shall be destroyed pursuant to State and Local regulation when the cannabis goods are no longer used for display.

8. Authorized for sale

a. The Executive Director (ED), with assistance from the General Manager (GM), will ensure that no cannabis goods be available for sale or delivery to a customer unless the cannabis goods were received from a licensed distributor.

b. The Executive Director (ED), with assistance from the General Manager (GM) and the Patient Service Clerk (PSC), will ensure that the cannabis goods have not exceeded their expiration or sell-by date if one is provided and in the case of manufactured cannabis products, the product complies with all requirements of Business and Professions Code section 26130 and all other relevant laws.

9. Daily limits

a. The Executive Director (ED), with assistance from the General Manager (GM) and the Patient Service Clerk (PSC), will ensure that staff will not sell more than the following amounts to an adult-use cannabis customer:

(i) not sell more than 28.5 grams of non-concentrated cannabis in a single day to a single customer

(ii) not sell more than 8 grams of concentrated cannabis as defined in Business and Professions Code section 26001, including concentrated cannabis contained in cannabis products, in a single day to a single customer

(iii) not sell more than 6 immature cannabis plants, in a single day to a single customer

(iv) not sell more than eight ounces of medicinal cannabis in a single day to a single medicinal cannabis customer. If a valid physician's recommendation contains a different amount than the limits listed in this section, the medicinal cannabis customer may purchase an amount of medicinal cannabis consistent with the patient's needs as recommended by a physician

10. Exit packaging

a. Cannabis goods purchased by a customer shall not leave the premises unless the goods are placed in an opaque exit package.

Attachments:

Section 26013, Business and Professions Code. Reference:
Sections 26010, 26012, 26070 and 26140, Business and Professions Code

Procedure #:	Policy Name: Labeling of Cannabis Products	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Labeling of Cannabis Products

Purpose:

To label all cannabis products in accordance with state laws in a way that is clear, concise, and accurate, and maximizes efficiency and inventory control.

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy in accordance with California Medical Marijuana Regulation and Safety Act and the Adult Use Marijuana Act

Inventory Manager (IM) - to oversee all packaging and labeling, in keeping with this policy

General Manager (GM) - to implement and supervise this policy oversee day-to-day operations; to oversee the placement of all packaged and labeled products in the dispensing area

Cannabis Service Specialist (CSS) - to assist with packaging and labeling all products

Detailed Procedures:

1. Labeling packages of cannabis flowers

a. With supervision from the Executive Director (ED) and the General Manager (GM), the Inventory Manager (IM) will oversee the weighing of cannabis flowers and package it into an 1/8 ounce or 1-gram tamper-evident packages or into bags sealed so that they are tamper evident. Cannabis Service Specialist (CSS) will assist with the packaging and labeling of all products, and the GM is responsible for making sure each product is packaged and labeled to this standard before it reaches the dispensary floor.

b. The packages and/or bags will then be labeled with the dispensary name, and the following information prominently displayed in a clear and legible font, on label designs that are not attractive to children:

The source and strain name.

The net weight of the cannabis in the package

The statements "FOR MEDICAL USE ONLY"

Information associated with the unique identifier issued by the Department of Food and Agriculture pursuant to Section 11362.777 of the Health and Safety Code (at such time this become available)

Any other requirements set by the Bureau of Medical Marijuana Regulation, Department of Public Health, or other governing body

2. Labeling packages of cannabis extracts

a. The IM will oversee the weighing of cannabis waxes and package them into 1/2 gram or 1-gram tamper-evident containers or inserted into bags sealed so that they are tamper evident. The packages and/or bags will be labeled with the dispensary name, and the following information prominently displayed in a clear and legible font, on label designs that are not attractive to children:

The source and strain name

The net weight of the cannabis in the package

The statements "FOR MEDICAL USE ONLY"

Information associated with the unique identifier issued by the Department of Food and Agriculture pursuant to

Section 11362.777 of the Health and Safety Code (at such time this become available)

Any other requirements set by the Bureau of Medical Marijuana Regulation, Department of Public Health, or other governing body

3. Labeling packages of cannabis topical medicines

- a. The IM will oversee the production and labeling of our in-house cannabis topicals.

The name of the product

The non-cannabis ingredients that are present, including essential oils.

The amount of content in the topical including size.

The pharmacologically active ingredients including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other, cannabinoid content

The statements "FOR MEDICAL USE ONLY"

Information associated with the unique identifier issued by the Department of Food and Agriculture pursuant to Section 11362.777 of the Health and Safety Code (at such time this become available)

Any other requirements set by the Bureau of Medical Marijuana Regulation, Department of Public Health,

4. Labeling packages of cannabis edible products

- a. The IM will oversee the packaging of cannabis edible products into tamper-evident packages or into bags sealed so that they are tamper evident. The packages or bags will then be labeled with the dispensary name, and the following information prominently displayed in a clear and legible font, on label designs that are not attractive to children and using only generic food names:

The source, strain name, and date of manufacture

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's total.

The pharmacologically active ingredients including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other, cannabinoid content

The statements "FOR MEDICAL USE ONLY" and "SCHEDULE I CONTROLLED SUBSTANCE"

The statement "KEEP OUT OF REACH OF CHILDREN AND ANIMALS" in bold print

Warnings about the medicine's intoxicating effects, including the statement, "THIS PRODUCT MAY IMPAIR THE ABILITY TO DRIVE OR OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

The statement "THE INTOXICATING EFFECTS OF THIS PRODUCT MAY BE DELAYED BY UP TO TWO HOURS."

Warnings if nuts or other known allergens (e.g., gluten, dairy, soy, etc.) are used

List of pharmacologically active ingredients, including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other, cannabinoid content

Food handling information (e.g., "Perishable. Refrigerate after opening")

Information associated with the unique identifier issued by the Department of Food and Agriculture pursuant to Section 11362.777 of the Health and Safety Code (at such time this become available)

Any other requirements set by the Bureau of Medical Marijuana Regulation, Department of Public Health, or other governing body

b. The IM, with oversight from the GM, is responsible for ensuring that new and returning edibles have up-to-code labeling.

Attachments:

Photos of labels

Procedure #:	Policy Name: Maintaining Sales Records	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintaining Sales Records

Purpose:

To maintain all dispensary sales records in a manner that ensures maximum accuracy and efficiency and follows all state and local regulations.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Office Administrator (ADMIN) - to assist in maintaining records; to assist the General Manager (GM)

Chief Finance Officer (CFO) - to establish and supervise bookkeeping and inventory management procedures and policies; to review sales records and reports regularly to ensure they are in good order and in accordance with state and local regulations, including keeping a general ledger of sales transactions

General Manager (GM) - to implement and supervise the entering and maintenance of sales data in the Point-of-Sale system by Patient Service Clerks; oversee the day-to-day maintenance of sales records, including the opening and closing procedures for the backup and storage of sales records

Inventory Manager (IM) to aid the GM in inventory management procedures

Assistant General Manager (AGM) - to supervise a reconciliation system

Shift Supervisor (SSUP) - to supervise a reconciliation system

Cannabis Service Specialist (CSS) - to enter data into the Point-of-Sale system in an accurate and complete manner

Detailed Procedures:

1. Implementing a Point-of-Sale (POS) tracking system
 - a. The Executive Director (ED) and General Manager (GM) will work the Finance Director (FD) to choose a Point-of-Sale (POS) system. The GM will work with an IT consultant to install the system, and the GM will be trained on operations and on how to train others.
 - b. The GM is responsible for keeping the POS system in working order and for contracting with the IT consultant as needed for repairs or updates.
 - c. The GM, with the assistance of the Inventory Manager (IM) and Assistant General Manager (AGM), will ensure that each medical cannabis item is entered into the POS system when it is acquired, and that the unit will be transferred and recorded as grams and 1/8s, after processing. They are also responsible for moving stock from the safe and into active dispensary stock, then updating the POS system to reflect this change.
 - d. The ED, with the assistance of the GM and Chief Finance Officer (CFO), will perform an annual review of the system, assessing its viability and comparing it to other systems in the marketplace.
2. Maintaining sales records in the POS system
 - a. The GM will train and supervise Cannabis Service Specialist (CSS) in the proper entering and maintenance of sales records in the POS system.
 - b. Each evening, CSS will print a record of the transactions they supervised, which will be provided to the GM along with an accounting of their sales and any cash. Each morning, the GM, AGM, or Shift Supervisor (SSUP) will

supervise a reconciliation system, looking for cash overage and shortage issues, and solving them.

c. Any PSC not properly performing this function will be retrained. However, failure to follow this policy will lead to termination.

d. The Office Administrator (ADMIN) will perform a double daily back-up and storage of the sales records. This will include using both a cloud-based server and using an external thumb drive or hard drive for storage. The COO will hire an IT consultant to automate this function to the maximum.

Attachments:

None

Procedure #:	Policy Name: Properly Dispensing Cannabis to Customers	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Properly Dispensing Cannabis to Customers

Purpose:

To properly dispense cannabis to customers in a way that ensures they receive the right strains and delivery methods in a timely manner, and with maximum efficiency and accuracy.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Purchaser (PA) - to procure a variety of cannabis medicines to meet patients' needs; to train the Patient Services Clerks in assisting members in choosing the right medicines

General Manager (GM) - to implement and supervise this policy; oversee day-to-day maintenance of sales records, including opening and closing procedures for collecting sales records; to gather information from patients about the effectiveness and side effects of the medicines used

Assistant General Manager (AGM) - to aid in training the Patient Services Clerks to assist members in choosing the right medicines

Cannabis Service Specialist (CSS) - to consult with members about using cannabis as a medicine and assist with their choice of medicine; to enter data into the Point-of-Sale system

Detailed Procedures:

1. Dispensing the proper weights and amount of medicine
 - a. Under the supervision of the Executive Director (ED), the General Manager (GM) will train and supervise Cannabis Service Specialist (CSS) in the proper weighing and dispensing of cannabis medicines.
 - b. During each transaction, the CSS will check to ensure that the product dispensed is properly labeled and is what the patient requested.
 - c. PSC will record the disbursement properly in the Point-of-Sale (POS) system and transact all payments properly.
 - d. PSC will stay focused on patient needs, with no side chatter between each about other topics while working the dispensary floor.
 - e. The Purchaser (PA) will provide information about the products carried by the dispensary to the GM and PSC, which includes coordinating training programs and gathering materials from suppliers for this information.
2. To assist patients in choosing the right medicine
 - a. The GM, along with the PA and Assistant General Manager (AGM), will train and supervise PSC by acting as a peer counselor or coach/mentor, emphasizing kindness and empathy with patients.
 - b. Each CSS will be trained to describe the contents and effects of different cannabis medicines and delivery methods to the members. The GM will present during open hours to assist with questions, if and when the need arises.
 - c. PSC will gather and record information about the effects and side effects of medicines that patients are using and recommend changes. The GM will assist with this.
 - d. The GM will consult with patients as needed about their use of medical cannabis, recommending they see a physician when necessary.

Attachments:

References about strains, cannabinoids, and effects

Procedure #:	Policy Name: Posting Prices and Products	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Posting Prices and Products

Purpose:

To post in a clear, legible, and timely manner all of the products available to patients with their proper prices on the website and in the dispensing area.

Definitions:

None

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Inventory Manager (IM) - to implement available product information into the Point of Sale System; to keep menus up to date

Purchaser (PA) - to implement this policy; to set prices on the available products and communicate this information to the Director of Clinical Services

General Manager (GM) - to implement and supervises this policy; keep records on all available products and communicate this information to the Procurement Director and Director of Clinical Services on a timely basis

Director of Clinical Services (DCS) - to interface with the Procurement Director and General Manager about the available products and their prices in order to promote them in a timely manner

Assistant General Manager (AGM - to assist the Inventory Specialist in implementing this policy

Detailed Procedures:

1. Posting prices and products to the dispensary's menu
 - a. Under the direction of the Executive Director (ED), the General Manager (GM) will implement a system so that each product is listed on the online menu when it arrives into stock and is taken off when it is sold out. The Purchaser (PA) will provide the Inventory Manager (IM) with the purchase order and invoice to be implemented into the Point of Sale (POS) System. Once it has been added into the system, the IM will ensure that it has been added to the menu. The GM and Assistant General Manager (AGM) will assist the IM with this process when necessary.
 - b. The GM Manager will implement a system to assure that menus are available for review in the dispensary, either in print or digital form. The IM, with the assistance of the GM and AGM, is responsible for keeping these menus available and up to date in real time.
2. Posting to the website and on social media
 - a. The GM is responsible for the creation of policies for posting items to the website and on social media. These Social Media Policies should match the guidelines set forth by each service.
 - b. The GMM will oversee the Director of Clinical Services (DCS) and their social media posts.
 - c. The DCS is responsible for updating the social media sites daily.
 - d. The AGM, with assistance from the IM, will make sure that the website is up to date with our monthly calendar and various upcoming events. The PA and GM will offer content guidance so that all current specials and promotions receive the attention on these sites.

Attachments:

None

Procedure #:	Policy Name: Sale of Non-Cannabis Products, Goods, or Services	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Sale of Non-Cannabis Products, Goods, or Services

Purpose:

To handle the sales of non-marijuana items at the dispensary in an efficient manner.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility-wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

Purchaser (PA) - to research prices on available non-marijuana products and choose items our members require; to set prices on available products and communicate this information to the General Manager; to receive and disburse non-marijuana items for sale

Inventory Manager (IM) - to receive and record non-cannabis product deliveries

Office Administrator (ADMIN) - to set prices on available products and communicate this information to the General Manager

General Manager (GM) - to supervise the PA implementing this policy; to help determine which non-marijuana products should be sold to best serve patients' needs; to keep non-marijuana items stocked marked with their prices where they may be sold; to assist patients with purchasing non-marijuana items

Cannabis Service Specialist (CSS) - to enter into the Point-of-Sale system all sales of non-marijuana items

Detailed Procedures:

1. Purchasing non-marijuana items for sale at the dispensary
 - a. The Executive Director (ED) will request that up to 150 square feet of the dispensary be authorized to display or sell devices for administration of medical cannabis. The ED will create and supervise a policy to ensure that these items may only be sold to qualified patients or primary caregivers. He or she will seek approval to sell other related products to qualified patients and will do so only if the sale of such products is a use approved by the City Administrator and is in compliance with the city's zoning codes and any other applicable state or local regulations. These items include books, t-shirts, mugs, and other items with the NorStar Pharmaceuticals logo or other medical cannabis insignia imprinted on it.
 - b. The General Manager (GM) will determine which products should be sold at the dispensary and communicate this information to the Purchaser (PA) and the ED.
 - c. The PA or GM will set the prices on the products that are purchased and communicate this information to the ED.
2. To make the purchased items available for sale at the dispensary
 - a. The PA or IM will receive all shipments of non-marijuana items, dispersing them to the GM or storing them in back stock.
 - b. The IM or GM will enter the items received and their sales price into the POS system.
 - c. The GM will keep non-marijuana items stocked in locked or unlocked cases on the floor and at the service stations. He or she will mark the products with their prices as needed.
 - d. The GM and Cannabis Service Specialist (CSS) will assist patients with accessing non-marijuana items and answer questions they may have about them. No person other than registered patients and caregivers are allowed to purchase these items.

3. To sell non-marijuana items at the dispensary

a. CSS or the GM will enter into the POS system all sales of non-marijuana items, taking the payment and giving change for each item to the patient.

Attachments:

None

Procedure #:	Policy Name: Reviewing and Reporting Dispensing Errors	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Reviewing and Reporting Dispensing Errors

Purpose:

To review and report any dispensing errors made by Patient Service Clerks and or the General Manager and to immediately take any appropriate action.

Definitions:

Point of Sale (POS) - a system for tracking patient sales, accounts, and inventory stock.

Scope:

Facility wide

Responsibilities:

Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement and supervise this policy; to report errors to the Chief Operations Officer/Project Manager; to address problems with Patient Services Clerks

Assistant General Manager (AGM) - to assist the General Manager (GM) in training staff on this policy

Chief Finance Officer (CFO) - to review all daily sales and report any potential dispensing errors to the General Manager

Detailed Procedures:

1. Reviewing dispensing errors

- a. The Chief Finance Officer (CFO) and General Manager (GM) will review each day's sales against inventory and report any discrepancies to the Executive Director (ED).
 - b. The CFO will work with the GM to investigate, identify, and solve any problems related to these errors.
2. Reporting dispensing errors
- a. The GM will report to the CFO any dispensing errors that are noticed on the dispensary floor each day. The GM will then work to repair any problems that result from this immediately, including the retraining staff on Point-of-Sale (POS) procedures.
 - b. The CFO will use any information learned from these errors to improve the POS system to limit future mistakes.
3. Training and retraining staff
- a. The GM is responsible for creating POS training programs for staff. The Assistant General Manager (AGM) will assist in implementing these training sessions, assisting the staff in the dispensary as they learn this system.
 - b. If a staff member makes an error, the GM is responsible for retraining them on the procedure.
 - c. If the error is serious or persistent, the GM will give the staff member a verbal or written warning along with retraining them. Any staff member who consistently fails to properly use the POS system will be terminated.

Attachments:

None

Procedure #:	Policy Name: Denial of Sale	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Denial of Sale

Purpose:
To deny sales of medical cannabis to any patient who does not qualify under state laws or who has violated the dispensary's Code of Conduct.

Definitions:
None

Scope:
Facility wide

Responsibilities:
Executive Director (ED) - to create and supervise this policy

General Manager (GM) - to implement this policy and supervise the day-to-day implementation of this policy; to train Reception, Security, and Patient Service Clerks on the policy; to address problems and complaints about the policy

Reception (REC) - to deny service to anyone who is not a registered member of the collective with an active medical cannabis recommendation

Cannabis Service Specialist (CSS) - to deny service to anyone who is not a registered member of the collective with an active medical cannabis recommendation

Security (SEC) - to deny service to anyone who is not a registered member of the collective with an active medical cannabis recommendation; to assist in escorting problem persons from the facility

Detailed Procedures:

1. NorStar Pharmaceuticals right to refuse service
 - a. Under the supervision of the Executive Director (ED), the General Manager (GM) will supervise the creation of a policy informing patients and caregivers that the dispensary reserves the right to refuse service to them, and under what conditions they may be denied medicine or have their membership revoked.
 - b. The GM will supervise creation of a Code of Conduct, Building Rules, and Good Neighbor Policy, which every person will have to agree to before gaining membership. Members will be denied entry, refused service, or banned for violations of any of these rules.
2. Denying expired or unqualified patients or caregivers
 - a. Reception (REC) will check the name of each patient or caregiver who enters the dispensary in the database to ensure that they have a current doctor's recommendation.
 - b. The REC will inform the patient if they do not qualify and how they can rectify the situation. They will also instruct them that they must come back with a current recommendation.
 - c. Security (SEC) will be on alert when a patient or caregiver is informed by the REC that they may not purchase medicine that day. If necessary, they will politely and firmly escort the patient from the dispensary, ensuring that they exit the parking lot in an orderly way.
3. Denying service to patients or caregivers who have violated the dispensary's Code of Conduct
 - a. The REC or Cannabis Service Specialist (CSS) will immediately report to the GM and/or SEC in their area if a patient or caregiver is:
 - Disruptive (e.g., yelling, verbally or physically threatening other patients or staff, making someone feel uncomfortable or unsafe)
 - Disrespectful (e.g., making racist comments)
 - Found to be diverting their medical marijuana to another person, either on the premises or offsite

Stating that they intend to divert their medical marijuana to another person or take it out of state

b. The GM will inform the patient or caregiver that they must leave the dispensary and cannot return that day, and then will inform the REC that the patient or caregiver may not enter the dispensary again that day. If the issue is serious, pervasive, or ongoing, the person's membership will be revoked.

c. SEC will politely and firmly escort the patient from the dispensary, ensuring that they exit the parking lot in an orderly way. They will inform the other SEC that the patient or caregiver may not enter the dispensary again that day.

4. Revoking a patient or caregiver's membership

a. The ED will supervise the creation of a policy that revokes a patient or caregiver's membership in the dispensary if a patient's behavior is extreme or if they have repeated violations of the dispensary's rules and Code of Conduct.

b. The GM will inform the patient or caregiver that their dispensary membership has been revoked and they may not purchase medicine there again. He or she will enter this information into the database so that RECs can view this denial of entry.

c. If a person whose membership has been removed returns to the dispensary, the REC will use the walkie-talkie to ask the GM to come forward and explain their denial of. The GM will politely inform anyone, for either the first time or again, of the reasons for this, suggesting more appropriate alternative methods for getting their medicines.

d. SEC will politely and firmly escort the patient from the dispensary, ensuring that they exit the parking lot in an orderly way. They will inform the other SEC and their Supervisor that the patient or caregiver may not enter the dispensary again at any time.

Attachments:

Code of Conduct, Building Rules, Good Neighbor Policy

Procedure #:	Policy Name: Process Ensuring that Cannabis Goods are Properly Packaged and Labeled Prior to Retail Sale	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Process Ensuring that Cannabis Goods are Properly Packaged and Labeled Prior to Retail Sale

Purpose:

Sets forth the process for ensuring that Cannabis Goods are Properly Packaged and Labeled Prior to Retail Sale

Definitions:

None

Scope:

All cannabis goods

Responsibilities

Executive Director (ED) - to establish and administrate this mandate

General Manager (GM) - to implement and supervise this policy

Inventory Manager (IM) - to execute this policy

Purchaser (PA) - to assist the Inventory Manager (IM) in executing this policy

Detailed Procedures:

1. Ensuring that cannabis goods are properly packaged and labeled prior to retail sale
 - a. Under direction and supervision of the Executive Director (ED), the General Manager (GM) will implement a system to

- ensure that no cannabis goods are made for retail sale unless they meet all packaging and labeling requirements.
- b. The Inventory Manager (IM), Purchaser (PA), or their designee, receiving cannabis product deliveries, will ensure that all products are screened for proper packaging and labeling at the time they are received in accordance with the NorStar Pharmaceuticals Distributor Plan.
2. Inventory Documentation
- a. All DIST products, including samples, received will be immediately entered into the POS and the Track and Trace system in accordance with current regulatory guidelines by the IM, or their designee, prior to making said products available for retail sale.
 - b. The ED, with assistance from the GM, will ensure that the IM will maintain an accurate record of all NorStar Pharmaceuticals product inventory. The ED shall provide the Bureau with the record of inventory upon request. The IM shall keep a record of the following information for all cannabis goods the retailer has in its inventory;
 - (i) A description of each item in the retailer's inventory. This description will be such that the cannabis goods can easily be identified;
 - (ii) An accurate measurement of the quantity of the item;
 - (iii) The date and time the cannabis goods were received by the retailer;
 - (iv) The sell-by or expiration date on any cannabis goods, if any;
 - (v) The name and license number of the licensee that delivered the cannabis goods to the retailer;
 - (vi) The name and license number of the distributor that provided the cannabis goods to the retailer; and
 - (vii) The price the retailer paid for the cannabis goods, including taxes, delivery costs, or any other costs.
3. Sales of plants and seeds
- a. Under direction from the ED, the IM will ensure that NorStar Pharmaceuticals shall only sell live, immature cannabis plants and seeds if all of the following requirements are met: the plant is not flowering; the plant or seed was purchased from a nursery that holds a valid Type-4 license; and A label is affixed to the plant or package containing any seeds which states "This

product has not been tested pursuant to Medicinal and Adult-Use Cannabis Regulation and Safety Act."

Attachments:

NorStar Pharmaceuticals Distributor Plan
Business and Professions Code section 26130. Reference: Sections 26070 and 26100, Business and Professions Code

Procedure #:	Policy Name: Process Ensuring that Cannabis Goods are Properly Tested by a Licensed Laboratory	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Process Ensuring that Cannabis Goods are Properly Tested by a Licensed Laboratory

Purpose:

Sets forth the process for ensuring that cannabis goods are properly tested by a licensed laboratory

Definitions:

None

Scope:

All cannabis goods

Responsibilities

Executive Director (ED) - to establish and administrate this mandate

General Manager (GM) - to implement and supervise this policy

Inventory Manager (IM) - to execute this policy

Purchaser (PA) - to assist the Inventory Manager (IM) in executing this policy

Detailed Procedures:

1. Ensuring that all cannabis goods are properly laboratory tested prior to retail sale
 - a. Under direction and supervision of the Executive Director (ED), the General Manager (GM) will implement a system to ensure that no cannabis goods are made for retail sale unless they meet all laboratory testing requirements and are labeled as such.
 - b. The Inventory Manager (IM), Purchaser (PA), or their designee, receiving cannabis product deliveries will ensure that all cannabis goods are properly tested and labeled with test results prior to receiving them from the distributor.
 - c. Any cannabis goods that are not accompanied by test results, or the test results are not affixed to the product label in accordance with current state and local laws, will be rejected and will not be received from the distributor at the time of delivery.

Attachments:

Section 26013, Business and Professions Code. Reference:
Sections 26010, 26012, 26110 and 26130, Business and Professions Code

NorStar Pharmaceuticals Management and Operations Manual

Section Five: Staffing Plan

Procedure #:	Policy Name: Mandatory Criminal Background Check Policy	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Mandatory Criminal Background Check Policy

Purpose:

Details the process for completing mandatory criminal background checks for all potential employees.

Definitions:

None

Scope:

All Potential NorStar Pharmaceuticals Employees and Contractors

Responsibilities:

General Manager (GM) - to create and implement a policy ensuring all potential employees and contractors pass a criminal background check

Human Resources (HR) - to ensure implementation and compliance

Detailed Procedures:

1. Completing mandatory criminal background checks.
 - a. The General Manager (GM) will create and implement this policy and Human Resources (HR Manager) will assist with its implementation and ensure compliance.
 - b. Criminal background checks can only be conducted after a potential new employee has been offered conditional employment and accepted the offer.

- c. All prospective new hires and contractors are required to sign a consent form for and submit to a criminal background check.
- d. The HR will provide all potential new hires and contractors a Live-Scan Application form.
- e. The HR will send all potential new hires and contractors to get a criminal background check from Sparkles or another company that meets all NorStar Pharmaceuticals requirements.
- f. The HR will give new hires and contractors a voucher or the money for the Live-Scan application or reimburse them when they turn in their receipt for the background check.
- g. The HR will instruct the hires and contractors to turn over the results of the Live-Scan Application to NorStar Pharmaceuticals upon receipt.
- h. The HR will read the results of the criminal background check confirm employment eligibility.
- i. If the new hire or contractor is eligible for continued employment, the HR Manager will inform the new hire or contractor of their eligibility.
- j. If the new hire or contractor is not eligible for employment after the criminal background check, the HR Manager will inform the new hire and immediately initiate the termination process.
- k. The HR will maintain a file with copies of all Live-Scan Application results.

Attachments:

NorStar Pharmaceuticals Background Check Consent Form

Live-Scan Application Information

Procedure #:	Policy Name: Age Eligibility Requirement for NorStar Pharmaceuticals Staff	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Minimum Age Eligibility Requirement for NorStar Pharmaceuticals Staff

Purpose:

Sets forth the minimum eligibility age requirements for staff.

Definitions:

None

Scope:

All NorStar Pharmaceuticals Employees and Contractors: Full-Time, Part-Time, and Temporary Employees

Responsibilities:

General Manager(GM) - to create a policy that ensures all employees meet the minimum age requirements for employment; implement and supervise a policy that ensures all employees and contractors meet minimum age requirements for employment

Human Resources (HR) - to ensure the implementation and compliance of this policy

Detailed Procedures:

1. With direction from the General Manager (GM), the Human Resources Manager (HR Manager) will obtain sufficient identification (ID) from potential new hires and contractors to verify that they meet the minimum age requirement for employment.
 - a. Documents accepted as proof-of-age include any of the following:
 - Valid driver's license from any U.S. state or territory

Valid ID from any U.S. state or territory

U.S. passport

U.S. passport card

U.S. military ID

Foreign government-issued passport

Permanent resident card (Green Card)

DHS-designated enhanced driver's license

Transportation Worker Identification Credential (TWIC Card)

Native American Tribal photo ID

Photo ID card issued by federal, state, or local government agencies or entities

DHS-Trusted Traveler cards (Global Entry, NEXUX, SENTRI, FAST, etc.)

b. All NorStar Pharmaceuticals employees and contractors must be at least twenty-one (21) years of age.

c. HR, under the supervision of the GM, will confirm the age of potential employees and contractors.

d. HR will keep a copy of the proof-of-age eligibility in each employee's file.

Attachments:

None

Procedure #:	Policy Name: Minimum Staffing Levels	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Minimum Staffing Levels Policy

Purpose:

To set minimum staffing levels for daily operations.

Definitions:

None

Scope:

Facility-Wide, Inside and Out

Responsibilities:

Executive Director (ED) - to establish and supervise this mandate

General Manager (GM) - to administrate and implement this mandate, train staff, and ensure compliance

Assistant General Manager (AGM) - to assist the General Manager in implementing this mandate and ensuring compliance

Shift Supervisor (SSUP) - to ensure minimum staffing levels in the absence of the General Manager and Assistant General Manager

Cannabis Service Specialist (CSS) - to be present to ensure minimum staffing levels

Reception (REC) - to be present to ensure minimum staffing levels

Security (SEC) - to keep the store secure inside and out

Detailed Procedures:

1. Minimum staffing levels.

- a. The Executive Director (ED) will establish and supervise this mandate.
- b. The General Manager (GM) will administer this mandate.
- c. The Assistant General Manager (AGM), with supervision from the GM, will implement this mandate, train staff, and ensure compliance.
- d. If the GM is not opening the store for operations, then he or she will assign the task to an AGM or Shift Supervisor (SSUP).
- e. SEC must be on-site prior to opening. Once the opening staff has opened the store in accordance with the NorStar Pharmaceuticals Opening Procedures, two Cannabis Service Specialist (CSS) and a manager, as well as SEC, must be present in order to operate. One PSC will run the sales line, and the other two will work reception. We will call in additional staff or management if we are nearing the minimum staff amount.
- f. There must be a GM, AGM, or SSUP present in addition to the operating staff.
- g. The store cannot be opened until Security (SEC) are in place. One officer will be stationed at the front door and another and monitoring the parking lot perimeter.
- h. SEC is to keep the store secure inside and outside.

Attachments:

NorStar Pharmaceuticals Opening Procedures

Procedure #:	Policy Name: Maintenance of an Employee Records Register	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Maintenance of an Employee Records Register

Purpose:

To maintain complete and up-to-date records for all current employees.

Definitions:

None

Scope:

All NorStar Pharmaceuticals Employees and Contractors

Responsibilities:

General Manager (GM) - to create and implement and administrate a policy to maintain all employee records

Human Resources (HR) -to ensure implementation and compliance of this policy

Detailed Procedures:

1. Maintenance of employee records
 - a. The General Manager (GM) will administer this mandate and will create and implement this policy.
 - b. NorStar Pharmaceuticals will maintain personnel records for current and past employees to document employment-related decisions, benefit choices, and compliance with regulatory record-keeping requirements.
 - c. An authorized agent, administrator, or supervisor will control access to personnel information in order to ensure privacy.

d. NorStar Pharmaceuticals shall maintain only one official personnel file, which is to be kept in the Office of Human Resources and overseen by the Human Resources (HR). Supervisors are discouraged from keeping informal personnel files on employees.

e. NorStar Pharmaceuticals will keep documents related to medical conditions or history of the employee and their family members, records of work-related injury or illness, or disability-related documentation, including requests for accommodation, in a separate confidential file.

f. The HR will create a new personnel file for each new hire.

g. The HR will update each employee's file on an as-needed basis, by filing any documentation confirming changes in employment status, position, salary, or benefits, as well as disciplinary actions or letters of reprimand.

h. Required employee file content includes, but is not limited to, the following:

Employee applications, résumés, and letters of reference

Honors or awards

W-2 and all required IRS or payroll paperwork

Notices regarding overtime compensation (non-exempt employees only) and any required union notices

Emergency contact information

Performance appraisals

Current job description

Proof-of-service form(s) for any disciplinary action taken

i. HR will regularly review each employee's personnel file to ensure that all necessary documents have been filed, and that date-sensitive documents have not expired.

j. Records and documents relating to salary, benefits, performance appraisals, and write ups can be expunged after two (2) years.

k. For the purpose of the Age Discrimination in Employment Act (ADEA) and under the Fair Labor Standards Act (FLSA), all personnel files for non-exempt employees will be retained for a minimum of three (3) years from the end of the fiscal year that the employee left NorStar Pharmaceuticals.

Attachments:

None

Procedure #:	Policy Name: General Staff Training	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

General Staff Training

Purpose:

To set for the correct process for general staff training.

Definitions:

None

Scope:

All-Inclusive, Company-Wide

Responsibilities:

Executive Director (ED) -to establish and supervise this mandate

General Manager (GM) - to create and implement this policy to ensure all employees are properly trained

Human Resources (HR) - to ensure implementation and compliance; to document the training sessions

Detailed Procedures:

1. General staff training
 - a. The Executive Director (ED) will establish and supervise this mandate.
 - b. The General Manager (GM) will create a policy to ensure that all employees are properly trained.
 - c. The General Manager (GM) will implement this policy.
 - d. Human Resources (HR) will ensure implementation and document each employee's training sessions.

2. General staff training requirements
 - a. The GM will identify the required training for each.
 - b. The GM will design a training program tailored for each unique job role or hire an outside contractor to conduct required training sessions in keeping with this mandate.
 - c. The GM or the HR will give each employee advance notice of the scheduled training session.
3. Documenting staff training sessions
 - a. The HR will record and keep on file the training each employee has completed.

Attachments:

None

Procedure #:	Policy Name: Use of Volunteers	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Use of Volunteers

Purpose:
To set guidelines for the use of volunteers.

Definitions:
None

Scope:
All-Inclusive, Company-Wide

Responsibilities:
General Manager (GM) - to administrate and implement this policy
Human Resources (HR) - to ensure implementation and compliance

Detailed Procedures:

1. Use of volunteers
 - a. The General Manager (GM) will implement this policy with assistance from Human Resources (HR).
 - b. The use of volunteers is never allowed to interfere with the positions available to current or potential union members.
 - c. NorStar Pharmaceuticals cannot use volunteers to fill paid employment positions reserved for current or potential union members.
 - d. NorStar Pharmaceuticals can use volunteers only for special and temporary projects that are not of interest to union members.

e. Special projects available to volunteers would include the following:

Parties/celebrations

Industry trade-show booth

Cannabis Cup

Public outreach

Special non-paid projects

Attachments:

None

Procedure #:	Policy Name: Notifying Proper Authorities of Changes in Employee Status	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Notifying Proper Authorities of Changes in Employee Status

Purpose:

To set forth the correct process for reporting changes in employee status to the proper authorities.

Definitions:

None

Scope:

All NorStar Pharmaceuticals Employees and Contractors

Responsibilities:

Executive Director (ED) - to administrate this mandate

General Manager (GM) - to create and implement a policy that ensures compliance

Human Resources (HR) - to ensure implementation and compliance

Detailed Procedures:

1. Notifying the proper authorities of changes in employee status
 - a. The Executive Director (ED) will administer this mandate. The General Manager (GM) will create and implement this policy with the assistance from the Human Resources (HR).
 - b. HR will report all new or rehired employees who work in California to the New Employee Registry within 20 days of their start-of-work date. Any employee rehired after a separation of at least 60 consecutive days must also be reported within 20 days.

c. HR will submit two files each month that are not less than 12 days and not more than 16 days apart. No report should be submitted if there are no new or rehired employees to report.

d. HR will notify the union (if a union is formed by workers) of any changes in employee employment status*.

e. HR will notify the City of Santa Rosa of any changes an employee's employment status*.

f. HR will notify the New Employee Registry of the California Employment Development Department of all new hires within 20 days of their work-start date**.

**Changes in employment status include, but are not limited to, the following:*

Employee discharge or retirement

Employee name change

Promotion of an employee to a management position

Changes in seniority status

Felony conviction

***Employers are required by law to report the following:*

Employers:

The California employer payroll tax account number

The Branch Code (complete only if employer was assigned a Branch Code Number)

The Federal Employer ID number

Business's name and address

A Contact person and their phone number

Employee:

First name, middle initial, and last name

Social Security Number

Home address

Start-of-work date

*** Any employee that is rehired after a separation of at least 60 consecutive days must also be reported within 20 days. Employers who report electronically must submit two files each month that are not less than 12 days and not more than 16 days apart. No report should be submitted if there are no new or rehired employees to report.*

Attachments:

City of Santa Rosa Cannabis Dispensary Ordinance ORD-2017-025

California's Employment Development Department official website

Procedure #:	Policy Name: Staff Scheduling	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Staff Scheduling

Purpose:
To set forth the correct process for staff scheduling.

Definitions:
Seniority for Non-union employees: Seniority is set by the employee's start-of-work date

Seniority for union employees: Seniority is set by the employee's start-of-work date

Time-Off Request: Written request to take paid or unpaid time away from core job responsibilities

Vacation Request: Written request to take paid or unpaid vacation time away from core job responsibilities

Scope:
All Employees, Company-Wide

Responsibilities:
Executive Director (ED)- to administer this mandate

General Manager (GM) - to create and implement a compliance policy

Human Resources (HR) - to ensure implementation and compliance; to schedule staff

Detailed Procedures:
1. Staff scheduling

- a. The Executive Director (ED) will administer this mandate. The General Manager (GM) will create and implement it with assistance from Human Resources (HR).
- b. All effort will be taken to accommodate time-off requests tendered in the appropriate manner and with appropriate advance notice. Operational responsibilities will almost always prevail when the company's needs conflict with the needs of the employee. Conflicts arising from multiple employees asking for time off on the same, similar, or overlapping time periods will be resolved by invoking seniority privileges, and by input from the employee's supervisor and/or department head.
- c. The NorStar Pharmaceuticals Schedule Template is based on the projected census needs of the company through the anticipation of customer/patient traffic patterns.
- d. Requests for fixed schedules will be considered in light of the company's known staffing patterns, position vacancies, and impact on other staff. NorStar Pharmaceuticals makes no promise of intent to give staff regular fixed schedules.
- e. Requests for fixed days off to support education, children/childcare, or other personal needs must be submitted in writing to the HR Manager and will be accommodated as often as possible with priority.
- f. In exchange for a fixed schedule, when granted, the employee commits to being flexible with all other days of the week, which may include more frequent weekend or undesirable shifts.
- g. A fixed schedule arrangement may be re-evaluated, in the event, that an employee's and/or department's needs change. Advanced notice from either party will be given before any changes are made.
- h. HR will ensure that staff is scheduled and assigned so there is adequate coverage throughout all shifts and days of the week.
- i. HR will work with the GM to create a schedule with the appropriate skill sets and supervision on every shift.
- j. HR will ensure that employees are scheduled to work no more than eight (8) hours per day and no more than forty

(40) hours per week. Employees may not exceed these numbers without prior consent from their department head.

k. HR will ensure that employees who have asked for schedules below eight (8) hours per day and forty (40) hours per week cumulative will be scheduled accordingly.

l. HR will ensure that employees are notified of their schedules.

m. All employees are required to acknowledge their schedules upon receipt.

n. Employees are responsible for arranging schedule changes after the schedule has been posted, with approval from their supervisor to ensure there is no excess overtime or other scheduling conflicts.

o. Requests for time off from employees must be authorized by HR with input from their supervisor or department head and the GM.

p. Employees who want to take a scheduled shift off must tender a time-off request through HR at least five (5) days before the requested time off. Any requests tendered fewer than five (5) days from the requested time off will be accommodated whenever possible.

q. Except in the case of illness, employees who want extended time off must tender a time-off request or vacation request to HR at least one (1) week prior to the requested time off.

r. HR will post a vacation calendar on or about December 15th of each year, and the employees will make their vacation selections by seniority in the classification no later than January 31st of each year. Employees failing to make their selection during this time shall will select their vacation on a space-available basis.

s. Requests for time off must be authorized by an employee's supervisor or department head and the GM.

Attachments:

None

Procedure #:	Policy Name: Hiring and Termination Plan	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Hiring and Termination Plan

Purpose:

To set forth the correct process for hiring and terminating employees.

Definitions:

None

Scope:

All-Inclusive

Responsibilities:

Executive Director (ED) - to establish and supervise this mandate

General Manager (GM) - to create a policy ensuring adherence to this mandate; implement this policy

Human Resources (HR) - to ensure implementation and compliance

Detailed Procedures:

1. Hiring and termination plan
 - a. The Executive Director (ED) will establish and supervise this mandate.
 - b. The General Manager (GM) will create a policy to ensure compliance.
 - c. The GM will implement this policy.
 - d. Human Resources (HR) will assist in implementation and document each employee's hiring and termination.

2. Employee hiring

a. The GM will work with HR to ensure that all employees are hired in accordance with this plan and all state and local regulations.

3. Termination of employees

a. The GM will work with HR to ensure that the termination of any employee is in accordance with current state law.

Attachments:

None

Procedure #:	Policy Name: Payroll Management	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Payroll Management

Purpose:

To set forth the correct process for payroll management.

Definitions:

None

Scope:

All Employees

Responsibilities:

Executive Director (ED) - to establish, supervise and administrate this mandate

General Manager (GM) - to issue paychecks to staff with assistance from Human Resource Manager

Chief Finance Officer (CFO) - to implement and supervise this mandate

Human Resources (HR) - to ensure implementation and compliance with this policy

Detailed Procedures:

1. Payroll management
 - a. The Executive Director (ED) will establish and supervise this mandate.
 - b. The (ED) will administer this mandate.
 - c. The Chief Financial Officer (CFO) will implement and supervise this mandate.
 - d. Human Resources (HR) will ensure implementation and compliance.
2. Creating a timecard and payroll report
 - a. HR will prepare a timecard and payroll report at the end of each pay period for the previous two weeks' payroll.
 - b. HR will use the timecard and payroll report to prepare the employee data for payroll.
3. Preparing earnings statements for employees
 - a. HR will prepare and print earnings statements for employees once the data for payroll is complete.
4. Preparing the paychecks
 - a. HR, or their designee, will prepare paychecks for staff using the earnings statements and withholding all required state and federal withholding monies.
 - b. HR, or their designee, will place each employee's paycheck and earnings statement into an envelope, seal it, and label the front with the employee's name, and place the envelope into the vault for safekeeping.
5. Paying the required withholding amounts to the state and federal governments
 - a. HR will prepare a withholding report for the CFO.
 - b. The CFO will pay all required withholding amounts to the state and federal government.

6. Issuing paychecks to employees

a. The GM, or their designee, will issue paychecks to staff on payday.

b. Checks must be completed for staff members no later than 3:00 PM.

Attachments:

None

Procedure #:	Policy Name: First Aid, Fire, and Disaster Training	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

First Aid, Fire, and Disaster Training

Purpose:

To set forth the correct process to perform first aid, fire, and disaster training.

Definitions:

None

Scope:

All Exempt and Non-Exempt Employees

Responsibilities:

Executive Director(ED) - to administer this mandate

General Manager (GM) - to oversee implementation; to train staff on these procedures

Human Resources (HR) - to record implementation and compliance

Director of Clinical Services (DCS) - to oversee implementation; to train staff on these procedures

Detailed Procedures:

1. Providing first aid, fire, and disaster training
 - a. This procedure sets forth the correct process for first aid, fire, and disaster training. Disasters include, but are not limited to: fire, flood, hurricane, earthquake, toxic gas or chemical spills, explosions, civil disturbances, and workplace accidents and violence resulting in injury or bodily harm. All training will be in accordance with the training requirements set forth in the

Occupational Safety and Health Administration (OSHA) Standards.

b. Under the administration of the Director of Clinical Services, the General Manager (GM) will coordinate with Human Resources (HR) to schedule training for the following categories:

First Aid

Fire

Natural disasters, including earthquake and flood

Toxic gas or chemical spill release

Workplace violence, including active shooter

b. HR will document and keep on file the trainings held, training dates, and the names of employees who attended. Training under this policy is mandatory for all officers, managers and employees.

Attachments:

None

Procedure #:	Policy Name: Managing Staff Breaks	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:
Managing Staff Breaks

Purpose:
To set forth the correct process for managing staff breaks.

Definitions:
None

Scope:
All Exempt and Non-exempt Employees

Responsibilities:
Executive Director (ED) - to create and administrate this
mandate

General Manager (GM) - to implement a policy that ensures
compliance

Assistant General Manager (AGM) - to aid the General Manager in
implementing a policy that ensures compliance

Human Resources (HR) - to ensure implementation and compliance

Shift Supervisors - to facilitate breaks; to delegate coverage
when necessary

Detailed Procedures:

1. Managing staff breaks.

a. The Executive Director (ED) will create and administer
this mandate, and the General Manager (GM) will oversee
implementation with the assistance of Human Resources (HR).

b. All exempt and non-exempt employees are required to take their breaks in accordance with California Labor Law, the Memo of Understanding Between NorStar Pharmaceuticals.

c. The GM or Assistant General Manager (AGM), with assistance from HR, will ensure that all employees receive a fifteen (15)-minute rest break for every four (4) hours worked, or major fraction thereof. Rest breaks must be in the middle of the work period as much as possible.

d. Rest breaks will be paid breaks.

e. The GM will ensure that employees will not be required to work during their rest break.

f. The GM will ensure that employees working more than five (5) hours in a day will receive a meal break.

g. The GM will ensure that employees receive a meal break no earlier than the third (3rd) hour of work and ending no later than the end of the fifth (5th) hour of work.

h. The GM will ensure that meal breaks are no less than thirty (30) but no more than sixty (60) minutes long.

i. Meal breaks are unpaid breaks.

j. The GM will ensure that employees are not required to work during their meal break.

k. The GM will ensure that employees working more than ten (10) hours receive a second meal break.

l. The GM will ensure that employees may waive their second meal break as long as they did not waive their first meal break and only if they are not working more than twelve (12) hours.

m. The GM will ensure that all non-exempt employee breaks are recorded on the NorStar Pharmaceuticals Break Sheet.

n. The GM will ensure that copies of the NorStar Pharmaceuticals Break Sheets will be kept on file for no less than three (3) years.

Attachments:

NorStar Pharmaceuticals Employee Handbook

Procedure #:	Policy Name: Providing the Best Customer Service	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Providing the Best Customer Service

Purpose:

To set forth the process for the best customer service.

Definitions:

Point-of-Service (POS) - a system for tracking patient sales, accounts, and inventory stock

Scope:

Reception, Sales Floor, and Express

Responsibilities:

Executive Director (ED) - to establish, supervise and administrate this mandate

General Manager (GM) - to train staff and ensure compliance with this mandate

Assistant General Manager (AGM) - to aid the General Manager in training staff and ensuring compliance with this mandate

Shift Supervisor (SSUP) - to supervise and direct the Patient Service Clerk Leads

Lead Cannabis Service Specialist (LCSS) - to greet customers in a welcoming manner; to facilitate the foot traffic on the sales floor; to supervise and direct to the Patient Service Clerks

Cannabis Service Specialist (CSS) - to offer the best patient service possible

Security (SEC) - to keep the facility secure inside and outside; to welcome patients upon their arrival.

Detailed Procedures:

1. Providing the best patient service
 - a. The Executive Director (ED) will establish and supervise this mandate.
 - b. The (ED) will administer this mandate.
 - c. The General Manager (GM) will train staff on this mandate and ensure compliance.
2. Receiving customers through the front door
 - a. As customers approach the building, Security (SEC) will greet them warmly with a smile and welcome them to NorStar Pharmaceuticals.
 - b. As customers approach the front door, inside SEC will open the door and welcome them to NorStar Pharmaceuticals. If special-needs patients or customers request assistance to navigate the front door or the reception area, SEC will offer that assistance. If additional assistance is required, Reception (REC) will radio to the back of the house for additional assistance.
 - c. REC will greet patients warmly, welcoming them to NorStar Pharmaceuticals and ask if they are a first-time or a returning customer.
 - d. If the patient is visiting for the first time, the REC will register them in accordance with the NorStar Pharmaceuticals Management and Operations Manual, Section 3.
 - e. If the patient is returning, the REC will check them in following the NorStar Pharmaceuticals Management and Operations Manual, Section 3.
 - f. After checking in a first-time or returning patient, the REC will thank the patient for choosing NorStar Pharmaceuticals, inform them of any current specials and vendor demos, and send them on to the dispensary sales floor for service.
3. Receiving patients on the dispensary sales floor
 - a. When the patient enters the dispensary sales floor, the Lead Cannabis Service Specialist (LCSS) greets them warmly. He or she will explain any daily specials or active vendor demos, answer any questions they may have, and let them

know what the current wait time or direct them immediately to the sales counter for service.

4. Receiving patients at the sales counter

a. The Cannabis Service Specialist (CSS) will greet the customer warmly and welcome them to NorStar Pharmaceuticals. The PSC will politely ask the customer their name and open their profile in the Point-of-Service (POS) system. The PSC will pull up the patient's past purchase history to help identify their needs and to check and see if the patient enjoyed their previous purchase, which will help the PSC determine beneficial products.

b. The CSS will ask the patient what product or service they desire and assist them with obtaining those items, offering any advice, counseling, and/or required disclaimers or best-practice advice on dosage and usage, politely suggestion non-smoking options whenever possible.

c. If the patient is not sure what product or service would best suit them, the CSS will help the patient make an informed decision by offering advice, counseling, and best-practice guidelines.

d. Once the patient decides on the products or services they require, the PSC will place the items in a child-resistant bag one at a time, verifying with the patient that each is the requested item; enter the item into the POS system; give the patient a total dollar amount of the requested items; and read the list back to the patient one last time to ensure order accuracy before finalizing the transaction.

e. Upon accepting the payment and closing out the POS system, the CSS will give the register receipt to the customer/patient and thank them for their patronage.

5. Customers leaving the sales floor

a. As the customer/patient leaves the sales counter and heads towards the exit, the CSS will thank them for their patronage, ask them how their experience was, and let them know that NorStar Pharmaceuticals awaits their return and is always willing to receive patient feedback.

b. If the customer/patient is in a wheelchair or otherwise needs assistance with the door, the PSC will provide the requested assistance.

6. Patients exiting through the reception lobby

a. As the patient exits the sales floor and passes through the reception lobby, the REC will thank the patient for their patronage and let them know NorStar Pharmaceuticals awaits their return.

b. If the patient is in a wheelchair or otherwise requires assistance with the door, REC and/or SEC will provide the requested assistance.

7. Patients exiting through the parking lot

a. As the patient exits the building and walks through the parking lot, outside SEC will escort them to their car if requested, thank them for their patronage, and let them know that NorStar Pharmaceuticals awaits their return.

Attachments:

NorStar Pharmaceuticals Management and Operations Manual

Procedure #:	Policy Name: Management of Employees Benefits	
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Policy:

Management of Employee Benefits

Purpose:

To set forth the correct process for managing employee benefits.

Definitions:

None

Scope:

All NorStar Pharmaceuticals Full-Time and Part-Time Employees

Responsibilities:

Executive Director (ED) - to establish, administrate and supervise this mandate

Human Resources (HR) - to ensure implementation and compliance

Detailed Procedures:

1. Management of employee benefits

a. The Executive Director (ED) will establish and supervise this mandate.

b. All employee benefits will be managed and available to all NorStar Pharmaceuticals employees in accordance with the NorStar Pharmaceuticals Employee Handbook.

c. Under the direction of the (ED), Human Resources (HR) will create an enrollment benefits profile for each employee, documenting the employee's hire date, marital status, number of dependents, total hours worked, and attendance records.

d. HR will ensure that all records are maintained and updated on an as-needed basis and available in the event of an audit.

e. HR will work closely with the finance department to ensure that NorStar Pharmaceuticals is credited with all of its entitled tax benefits.

f. HR will ensure that all employees are informed of and given the opportunity to take advantage of all available benefits.

Attachments:

NorStar Pharmaceuticals Employee Handbook