



**Expanding Roots, Inc.**  
**Microbusiness with Cultivation, Manufacturing, Distribution, & Retail**

**Site Security Plan**

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*By Andrew Trippel at 1:53 pm, Dec 31, 2018*

Applicant's facility will be adequately equipped with security personnel, access controls, security surveillance, electronic security systems, failure notification systems, electrical backup, and emergency procedures, as described in detail below. Grant Babbitt is the local site contact person who will be responsible for the use and will provide and keep current full contact information to the Santa Rosa Police Department dispatch database as part of the alarm permitting process.

*i. Security Personnel*

In accordance with Bureau of Cannabis Control regulations, which require retailers to have security personnel present at the licensed premises 24-hours per day, Applicant will have security guards present at the retail premises at all hours. This security guard will be in place at the retail storefront entrance at all times.

*ii. Security Surveillance System*

Applicant will provide a comprehensive surveillance system, including motion-sensor cameras throughout the facility. All cameras will be located strategically to view all areas of the facility and will have resolution to adequately capture images of people and movement throughout the facility, including at all exterior and interior premise entry points. The cameras will record at all times and footage will be stored for a minimum of 90 days. Additionally, all cameras will be HD quality, and will have infrared capabilities to monitor dark rooms.

The extensive surveillance system will be run and monitored by an outside agency. Security personnel from an offsite licensed security company will monitor the CCTV system 24/7. There will be a computer and access center onsite with a video printer to allow local control and to produce a clear still photo from any live or recorded video on demand, in the event of a security breach. Additionally, local law enforcement will be provided remote access to the security footage and provided access to archived footage promptly upon request.

The video surveillance system will be configured to allow for the exporting of still images in a variety of standard formats like .jpg or .bmp so that they can be digitally transferred. Digital images will also have data protection that prevents digital alteration and allows for a date/time stamp of both the image and the file creation to be authenticated. Video or still images exported from the system can be viewed on any standard computer operating system, such as Windows or Mac. The onsite system will be located in a secure office area that only the GM and security personnel will be able to access. The images from all cameras will have a date/time stamp to allow verification of video integrity during the life of Applicant.

*iii. Access Controls*

Applicant will provide and install keyless entry ports to ensure that only authorized personnel have access to limited access areas, and so that both employees and customers, as well as cannabis and cannabis products, are safe and secure inside the facility. All doors will be equipped with an alarm that will sound if they are damaged or opened without a proper key and/or code. These secured access ports will be installed in all doors that separate limited access areas from common areas and from the public retail premises. Information about who accesses each door will be tracked and stored for at least 90 days.

All access points from outside of the facility will have both locks and alarms. All perimeter windows and hatches will remain closed and locked with tamper-proof security devices. Access points will be equipped with perimeter

alarms that will sound if there is any breach of these apparatuses. In the event of any theft or loss of cannabis, these devices will also provide a security log of who accessed the doors for any ensuing investigations.

Alarm systems can also be triggered if an employee presses either a panic or duress button. These buttons will be installed in strategic locations only accessible to employees. The panic button should be pressed when there is a theft or breach and employees or other individuals inside the facility would not be placed in danger by a loud alarm. The duress button will still notify authorities just like a typical alarm, but will not make any sound. These duress buttons will allow employees who are threatened to signal an alarm without escalating the situation.

Arming and disarming the security system will require an access code. Both the entry alarm and surveillance alarm will notify the monitoring service if a failure is detected in the system, which will be corrected as soon as possible. If the failure prevents security systems from operating, the facility will take additional security measures until it is fixed.

*iv. Electronic Security System*

In addition to the surveillance system, Applicant will implement a comprehensive electronic security system, including third party monitoring of all surveillance and alarms, intrusion detection electronic alarms, and panic/duress buttons at strategic locations within the facility. The intrusion detection system will use appropriate methods (such as pressure sensitivity, lasers, etc.) to determine if any entrance, exit, or window has been breached without authorization.

*v. Failure Notification System and Electrical Backup Systems*

The security system will include a failure notification system to provide an audible, visual and text notification of any failure in the surveillance or alarm system. The audible and visual notifications will be onsite at the equipment monitoring station. A text alert will go out to designated cultivation agents within five minutes after the failure. These notifications will be in both text message and email form. The message will include the time of failure, type of failure, cause of failure (if identified), extent of systems malfunctioning, and contact information for the security company.

*vi. Surveillance Recording Access Controls*

Only authorized security and appropriate management personnel will be allowed to access the surveillance monitoring and recording area. This secured area contains a surveillance hard-drive at which all of the security devices in the facility can be monitored and adjusted, and the surveillance archive can be viewed and printed. The terminal will be in an isolated area with a locked door that only the Principal Officers, GM, and Security Agents will have access to. Law Enforcement and the City of Santa Rosa will be provided access by authorized personnel, upon request and verification of appropriate organization credentials.

*vii. Emergency Response Procedures*

In addition to the above described security and surveillance technology, Applicant's facility will be equipped with fire and burglar alarm systems. The fire alarm will meet NFPA72 and local code standards. Applicant has procedures in place in case of an emergency. Training will be provided to employees in case of break-in, robbery, or burglary, fire, flood, or other natural disaster. If the employees cannot safely leave the building, there will be an emergency kit that contains food, water, and other supplies.

Applicant's first priority is the safety of its patients/customers and employees. Management will draft security and emergency procedures and review them with employees regularly. Fire and earthquake drills will be conducted to familiarize employees with proper procedures to follow in evacuating the facility and retail store. Formal procedures will be documented in the employee handbook and posted in the break room. Guidelines will include but are not limited to the following:

- In case of an emergency such as a fire or event causing injury, dial 9-1-1 to alert police and rescue workers;
- Notify security if any threats or offensive behavior is initiated by a patient/customer or fellow employee;

- If an alarm goes off, proceed quickly and calmly to emergency exits and direct patients/customers to do the same;
- Follow the processes outlined during fire and earthquake drills.

*viii. Emergency Access*

Applicant recognizes that it may be required to have a key box installed in a location approved by the Fire Department in the event that the Fire Code Official determines that access to or within a structure or area is restricted because of secured openings, or that immediate access may be necessary for life-saving or fire-fighting purposes. In this event, Applicant will install and maintain a box of an approved type that will contain keys to gain necessary access, as required by the Fire Code Official and the California Fire Code.

*ix. Product Storage and Waste Management*

As was discussed in detail above, the facility is designed to prevent unauthorized entrance into areas containing Cannabis or Cannabis Products. Limited-access areas accessible to only authorized personnel will be established. The facility has secure doors that will separate the retail area from the cultivation, manufacturing, and distribution areas (*see Site Plans*). Customers will not be granted access to the Stock Room, which can only be accessed through the Office attached to the Dispensary area. The door to this Office will only be accessible by Applicant or Applicant's employees who are granted access behind the counter in the Dispensary area. Furthermore, a secure Vault and two Storage areas will be in separate parts of the building from the Retail area (*see Site Plans*). Cannabis and cannabis products that are not used for display purposes or immediate sale will be securely stored in the Vault or the Stock Room, and will be stored in a manner reasonably designed to prevent diversion, theft, and loss.

In accordance with the Bureau of Cannabis Control Regulations Section 5302, Applicant will ensure all cannabis goods batches are stored separately and distinctly from other cannabis goods batches on the premises. In compliance with Bureau of Cannabis Control Regulations Section 5309, Applicant will reconcile all inventories of cannabis goods at least once every 14 days and will keep an inventory log containing detailed information about each batch. If Applicant finds a discrepancy between the inventory of stock and the inventory log or track and trace system that is outside normal weight loss caused by moisture loss, Applicant will commence a full audit of the batch in which the discrepancy is found (Bureau of Cannabis Control Regulations Section 5309).

An onsite dumpster is located at the north-east area of the lot, closest to the northern property line. Applicant will ensure this dumpster is locked at all times. Packaging and product waste will be recycled and composted to the maximum extent possible. Cannabis and cannabis products will only be placed into the dumpster for disposal at such time that these items are rendered completely destroyed. All waste management techniques will ensure cannabis products and associated product waste is stored and secured in a manner that prevents diversion, theft, loss, hazards, and nuisance, in accordance with Section 20-46.050(G) of the City Ordinance.

*x. Transportation and Delivery Procedures*

Distribution Activities

In accordance with Section 5413 of the Bureau of Cannabis Control Regulations, transportation of cannabis goods will only be conducted by Applicant or Applicant's employees in a motor vehicle or trailer. No person under the age of 21 will be allowed inside a commercial vehicle or trailer transporting cannabis goods, and only Applicant or Applicant's employees will be in the vehicle while transporting cannabis goods (Bureau of Cannabis Control Regulations Section 5313). For distribution purposes, Applicant will only transport cannabis goods between licensees shipping or receiving cannabis goods and its own facility (Bureau of Cannabis Control Regulations Section 5311).

Prior to transporting cannabis goods, Applicant will generate a shipping manifest through the track and trace system and will securely transmit the manifest to the Bureau of Cannabis Control and the licensee that will receive the cannabis goods (Bureau of Cannabis Control Regulations Section 5314). Applicant will ensure and verify that the cannabis goods being taken into possession for transport are as described and are accurately reflected in the shipping manifest.

Applicant plans to transport both medicinal and adult-use cannabis. In accordance with Section 5311 of the Bureau of Cannabis Control Regulations, Applicant may transport multiple shipments of cannabis goods at one time. Furthermore, according to Bureau of Cannabis Control Regulations Section 5311(k), both medicinal and adult-use cannabis goods may be transported in the same vehicle only if the cannabis goods are clearly identified and marked as “A” for adult-use cannabis goods, or “M” for medicinal cannabis goods, both on the physical packaging of the cannabis goods, and on the shipping manifest. Applicant will ensure the medicinal and adult-use cannabis goods will be secured and separated from each other in the vehicle or trailer. Applicant will never transport non-cannabis goods with cannabis goods (Bureau of Cannabis Control Regulations Section 5311(k)).

Applicant will ensure that all cannabis goods are locked in a box, container, or cage that is secured to the inside of the vehicle or trailer, and that no cannabis goods will be visible or identifiable from outside the vehicle or trailer at any time (Bureau of Cannabis Control Regulations Section 5311). Vehicles and trailers will have a vehicle alarm system, and while left unattended, all vehicles and trailers will be locked and secured. Packages or containers holding cannabis goods will never be tampered with or opened during transport by Applicant or Applicant’s employees (Bureau of Cannabis Control Regulations Section 5311).

Applicant will provide to the Bureau of Cannabis Control and the City of Santa Rosa all information it requires regarding the vehicles or trailers used for transportation and distribution, including proof of ownership or lease, the year, make, model, license plate number, and numerical VIN for any and all vehicles and trailers that Applicant will use to transport cannabis goods (Bureau of Cannabis Control Regulations Section 5312).

#### Retail Delivery Activities

Applicant will make both medicinal and adult use cannabis and cannabis products available for delivery. In accordance with Section 5418 of the Bureau of Cannabis Control Regulations, while making deliveries, Applicant’s delivery employee will not carry an amount of cannabis goods worth more than \$3,000 at any one time. This value will be determined using the current retail price of all cannabis goods carried by the delivery employee.

In accordance with Section 5417 of the Bureau of Cannabis Control Regulations, Applicant’s delivery employees will only travel in an enclosed motor vehicle operated by the delivery employee. The delivery employee will ensure the cannabis goods are not visible to the public inside the vehicle or at any time during delivery of the cannabis goods. Applicant will ensure all cannabis and cannabis products are securely stored within the trunk of the vehicle, or if the vehicle has no dedicated trunk, another secure, discrete location inside the vehicle. Applicant’s delivery employee will not leave cannabis goods in an unattended motor vehicle unless the vehicle is locked and equipped with an active vehicle alarm system (Bureau of Cannabis Control Regulations Section 5417).

The vehicles Applicant will use for the delivery of cannabis goods will be outfitted with Global Position System (GPS) devices, for ready identification of the geographic location of each delivery vehicle at any time (Bureau of Cannabis Control Regulations Section 5417). The dedicated GPS device will be owned by Applicant and will be used for delivery only. The device will be affixed to the delivery vehicle and will remain active and inside of the delivery vehicle at all times during delivery. At all times, Applicant will be able to identify the geographic location of all delivery vehicles that are making deliveries and will provide that information to the Bureau of Cannabis Control upon request (Bureau of Cannabis Control Regulations Section 5417).

In accordance with Bureau of Cannabis Control Regulations Section 5417, Applicant is prepared to provide the Bureau of Cannabis Control with information regarding any motor vehicle used for the delivery of cannabis goods, including the vehicle’s make, model, color, VIN, license plate number and DMV registration. Applicant understands that any vehicle used to deliver cannabis goods is subject to inspection by the Bureau of Cannabis Control and that the vehicles may be stopped and inspected by the Bureau at the facility or during delivery (Bureau of Cannabis Control Regulations Section 5417).