

MARIN COUNTY BOARD OF SUPERVISORS

RESOLUTION NO. _____

A RESOLUTION DENYING THE URBAN HILLS APPEAL OF THE COUNTY ADMINISTRATOR’S DECISION AND DENYING THE URBAN HILLS MEDICAL CANNABIS DISPENSARY LICENSE APPLICATION

SECTION I: FINDINGS

1. WHEREAS, on August 31, 2016, Urban Hills submitted an application and fees for a medical cannabis dispensary license to the Community Development Agency pursuant to the requirements of Marin County Ordinance 3639 and the implementation program. The proposed dispensary is located at 230 Shoreline Highway, Mill Valley, and would be comprised of a medical cannabis dispensary within an existing 3,700 square-foot building. With dispensary hours of operation Monday – Sunday 10 a.m. – 8:30 p.m. and delivery hours Monday – Sunday 11 a.m. – 7:30 p.m.

2. WHEREAS, on April 10, 2017, the County Administrator (CAO) denied the proposed license. The CAO found that the proposed application did not meet and exceed all of the review criteria in Marin County Code Section 6.85.061 with the right combination of experienced applicant/operator, a location that adequately accommodates the use without significant neighborhood impacts, and an operating plan that fits with the type and scale of the proposed dispensary use, and the requirements of Marin County Code Section 6.85.042.

3. WHEREAS, the applicant submitted a timely appeal of the CAO’s decision, claiming that the County Administrator rejected all applications without factual basis.

4. WHEREAS, on May 23, 2017, the Board of Supervisors conducted a public hearing to consider the appeal.

5. WHEREAS, for this application, the Board of Supervisors finds that the applicant did not meet criteria “L” under Marin County Code 6.85.061 (“That the dispensary would not adversely affect the health, peace, or safety of persons living or working in the surrounding area, overly burden a specific neighborhood with special needs or high impact uses, or contribute a public nuisance; or that the dispensary has resulted in repeated nuisance activities including disturbances of the peace, illegal drug activity, ingesting cannabis in public, 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 detentions or arrests.”) The Board bases this finding on the existence of expressed concerns by neighbors and the verified concerns of the Advisory Committee.

- a. Existence of Neighborhood Concern: “additional regional traffic would overburden the hazardous traffic conditions” (Attachment 9; Public Comment 00005; 9/21/16 letter from Sustainable TamAlmonte). Specifically, because it is not unreasonable to be concerned about the draw of regional traffic to one of two potential locations along the 101, the Board finds that the existence of this rational neighborhood concern is sufficient to show

that the dispensary would overly adversely affect the health, peace, or safety of persons living or working in the surrounding area.

- b. **Existence of Neighborhood Concern:** “Five schools/facilities on Shoreline Hwy geared to children should qualify as Youth-Oriented Facilities as defined by the ordinance because they are amenities that are intended for the use by minors or where the individuals who regularly use the facility are predominately minors. These include Mathnasium, Poekie Nook, Roco Dance & Fitness, Mill Valley Potters Studio, and Proof Lab” (Attachment 9; Public Comment 00002; 1/31/17 letter from Sustainable TamAlmonte). Specifically, because it is not unreasonable to be concerned about youth finding ways to gain access to marijuana at this particular location, the Board finds that the existence of this rational neighborhood concern is sufficient to show that that the dispensary would adversely affect the health, peace, or safety of persons living or working in the surrounding area.

6. **WHEREAS**, the Board, after reviewing all of the arguments presented in the applicant's written appeal, and after hearing the arguments and evidence presented at the hearing, finds that the applicant/appellant has failed to negate the existence of the above-stated evidence that justifies denial of the license.

SECTION II: ACTION

NOW, THEREFORE, BE IT RESOLVED that the Marin County Board of Supervisors hereby denies the Urban Hills Appeal and upholds the County Administrator's decision by denying the Urban Hills application for a medical cannabis dispensary license.

SECTION III: VOTE

ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin, State of California, on the 23rd day of May, 2017, by the following vote to wit:

AYES: SUPERVISORS

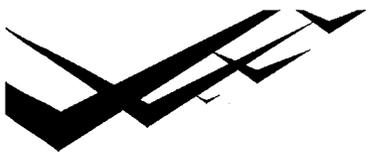
NOES:

ABSENT:

JUDY ARNOLD, PRESIDENT
MARIN COUNTY BOARD OF SUPERVISORS

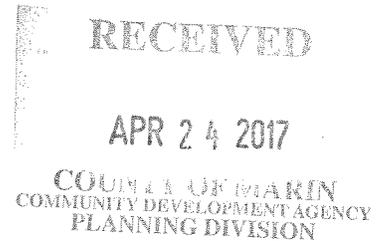
ATTEST:

Matthew H. Hymel
Clerk of the Board of Supervisors



**CLARK
NEUBERT** LLP

APR 24 2017 PM 2:06 Planning



April 24, 2017

Hon. Judy Arnold
Hon. Damon Connolly
Hon. Katie Rice
Hon. Kate Sears
Hon. Dennis Rodini
Hon. Kate Sears
Board of Supervisors
County of Marin
Room 329 Civic Center
3501 Civic Center Drive
San Rafael, CA 94903

RE: *Appeal from County Administrator's Determination Denying Urban Hills, Inc.'s Application (Application ID 16-0040) to Operate a Medical Cannabis Dispensary at 230 Shoreline Hwy Marin County Code Section 6.85.063*

Dear Honorable Members of the Board of Supervisors:

Our firm represents Urban Hills, Inc. ("Urban Hills" or "UH"), an applicant for a medical cannabis dispensary license under Ordinance No. 3639 (Marin County Code Chapter 6.85) (the "Ordinance"), which application was denied by the County Administrator by written Notice of Decision on April 10, 2017 (the "NOD"). Urban Hills hereby submits to the Board of Supervisors the following appeal of that decision.

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201 SPEAR STREET | SUITE 1100
SAN FRANCISCO, CALIFORNIA 94105
(415) 779-0977 MAIN | (415) 757-3449 FAX

URBAN HILLS 00004

Summary of the Merits of Urban Hills' Appeal

Contrary to the will of the citizens of Marin County – who have strongly and consistently supported access to medical cannabis by their choices at the ballot – and the clear direction of the Board of Supervisors, which unanimously passed Ordinance 3639, the County Administrator on April 10, 2017 rejected all applications for a medical cannabis dispensary without factual basis. Rather, the Notice of Decision, which makes no specific factual findings relative to any application or review criteria of the Ordinance, appears to favor the will of small group of anti-cannabis activists over the overwhelming majority of Marin County residents and those meritorious applicants – like Urban Hills – who have fully complied with every County requirement.

Indeed, Urban Hills' application – presented by a team having 35+ years operating Bay Area dispensaries, and over 50 years of experience with California's medical cannabis collectives – meets and exceeds every review criteria and each of the six components of the Medical Cannabis Dispensary Program Dispensary Application Guide. As such, Urban Hills requests the Board of Supervisors exercise its independent power of review and approve its application.

Introduction

The Board of Supervisors (hereinafter "BOS"), whose paramount concern is to protect the health and safety of Marin County's communities, unanimously approved the Ordinance in 2015. This action was the result of the state passing the Medical Cannabis Regulation & Safety Act; and months (if not years) of investigation and careful consideration by the Medical Cannabis *Ad Hoc* Committee, the full BOS, and its staff, of the needs and concerns of the community. The Ordinance, by providing for highly regulated cannabis dispensaries, creates the only clear path to eradicating an illegal cannabis market that targets minors. While drafting the Ordinance, the BOS took public comment on multiple occasions, listening to and considering carefully the ideas expressed both in support and opposition, and revised the Ordinance accordingly. The result was clear: Marin County wants excellent storefront medical cannabis dispensaries, and it should have them.

Indeed, the Ordinance's passage reflected the broad consensus of the 260,000 Marin County residents and the nearly 11,000 residents of Tam Valley¹ who have been voicing their strong support for the legalization and regulation of medical and adult use cannabis, and approval of medical cannabis dispensaries in Marin County since 1996. In 1996, Marin County voters passed Proposition 215 (medical cannabis access) with 73% in favor.² And twenty years later, in November 2016, with 88% turn out, County voters passed Proposition 64 (which legalized the adult-use of cannabis) with a similar margin, 70% voting in favor (a higher margin than "yes" for the Mill Valley School Measure E on the same ballot).³ Clearly, the overwhelming majority of Marin County residents support the licensing and operation of storefront medical cannabis dispensaries in our community.

Of course, during the Ordinance drafting period, as now during this cannabis dispensary license application process, the public comments submitted to the BOS in opposition outnumbered those in support. However, this fact demonstrates only that organized opponents are always more vocal than those supporters who place their trust in their elected officials to reflect the will of the majority as expressed in elections.

¹ https://en.wikipedia.org/wiki/Tamalpais-Homestead_Valley,California

² "2012/2013 Marin County Civil Grand Jury Report Medical Marijuana: Up in Smoke?" which made factual findings and recommended that the County take the following actions: "R1: The Board of Supervisors respect the will of the voters and the intentions of the Compassionate Use Act by using its authority to uphold access to medical marijuana within the county. Compassion without action is not enough. R2: The County Department of Health and Human Services establish standards for edible medical marijuana sold in Marin County

R3: The Board of Supervisors, in concert with law enforcement, the Planning Commission, and representatives from the Alcohol and Drug Advisory Board, develop a viable set of ordinances for Medical Marijuana Dispensaries in the unincorporated areas of the County. (https://www.marincounty.org/~media/files/departments/gj/reports-responses/2012/hhs_up_in_smoke_final2.pdf

³ <https://www.marincounty.org/depts/rv/election-info/past-elections/page-data/tabs-collection/2016/nov-8/results>

Unfortunately, the County Administrator’s decision threatens to supplant this clear majority in favor of the preferences of a small, vocal minority.

Trusting in the intentions of the BOS which enacted the Ordinance, Urban Hills relied upon the clear directions contained in the Ordinance and Application Guide by investing significant resources, time and effort to meet and exceed the County’s requirements. Over the course of two years, this nonprofit mutual benefit corporation assembled an expert team, sited an ideal location, and submitted a robust and complete application that meets and exceeds all required operating, location, and public safety standards. As such, Urban Hills respectfully requests the Board of Supervisors grant its appeal and award Urban Hills a license to operate a medical cannabis dispensary at 230 Shoreline Highway, under any conditions or restrictions it may impose.

Argument

A. The Board of Supervisors Has Authority to Hear Urban Hills’ Appeal

Pursuant Marin County Code (“MCC”) Section 6.85.063, Urban Hills (hereinafter “UH”) hereby appeals this decision to the Board of Supervisors (“BOS”) within 10 days of the written notice upon the grounds stated herein. The Code provides that the BOS “shall have the authority to determine all questions raised on such appeal.” (MCC 6.85.063(B))

B. Urban Hills’ Appeal is Based Upon County Documents and Records in the Application Process

This appeal is based on upon: (1) Marin County Code Chapter 6.85 (the “Ordinance”) and all applicable laws and ordinances (Exhibit A⁴); (2) The Marin County Medical Dispensary Program Dispensary Application Guide prepared by the County Development Agency (“Application Guide”) (Exhibit B); (3) all press releases, notices, and other materials made available on the Marin County Medical Cannabis Program webpage: <https://www.marincounty.org/main/medicalcannabis>; (4) UH’s application, including “Additional Materials Request” (“Additional Materials”) (collectively the

⁴ Exhibits have been provided for ease of reference.

"Application") (on file with the County Administrator's office); (5) the January 31, 2017 Tam Valley public hearing; (6) public comments received by the County made available to the applicants; (7) the County Administrator's April 10, 2017 Notice of Decision ("NOD") and attached Medical Cannabis Advisory Committee ("MDCAC") Medical Cannabis Dispensary Application Evaluations ("Evaluations") (Exhibit C); (8) Marin County voting records; (9) Marin County documents regarding relevant public opinion; and (10) the arguments herein and all exhibits hereto. A public records request was also made to County Counsel on April 14, 2017, which documents have not yet been received by UH. UH reserves the right to supplement this appeal and/or to present evidence at the public hearing based upon any such documents received after the April 24, 2017 deadline for submission of this appeal.

C. **The County Administrator's Denial**

The County Administrator denied UH's application based upon a finding that "[n]one of the proposed cannabis dispensary licenses met and exceeded all of the review criteria in Marin County Code Section 6.84.061 with the right combination" of the following:

- (1) experienced applicant/operator;
 - (2) a location that adequately accommodates the use without neighborhood impacts;
 - (3) an operating plan that fits the type and scale of the proposed dispensary use;
- and
- (4) the requirements of Marin County Code Section 6.85.042.
- (NOD, p. 1).

Additionally, the County Administrator notes that he considered the following relevant to his determination about "whether the dispensary would 'adversely affect the health, peace or safety of persons living or working in the surrounding areas, overly

burden a specific neighborhood with special needs or high impact uses, or contribute to a public nuisance..." under Marin County Code 6.85.061(L):

(5) the "Medical Cannabis Advisory Committee's Application Evaluations" as providing information "about the results of the public input process"; and

(6) the County Administrator's own investigation about "specific neighborhood concerns being raised in the public process," including an investigation into "the extent to that any proposal might increase cannabis access to minors, specific traffic concerns, etc."

(*Id.*, pp. 1-2.)

Ultimately, the County Administrator states that the decision was based upon his independent evaluation of the information before him based upon the review criteria of the Ordinance.

D. The County Administrator's Notice of Decision is Unsupported by Specific Factual Findings

The Application Guide states the NOD "shall include findings relative to [Review Criteria of MCC 6.85.061]". (Application Guide, p. 7.) However, the NOD contains no findings with regard UH's application specifically or to any one of the review criteria. The decision simply states that no application had the "right combination" of factors, without reference to which factors the County Administrator determined UH did or did not meet.⁵ (NOD, p. 1.) Indeed, despite the statement that the County Administrator considered factor (L) [of 6.85.061] regarding public impacts, the NOD contains no finding that that UH would: (1) adversely affect the health, peace or safety of the community, have disproportionate neighborhood impacts, cause a public nuisance; (2) increase minors' access to cannabis; or (3) create an particular traffic concern. (*Id.*, pp. 1-2.)

Neither is any information or data provided with regard to the "careful[] investigat[ion]" the County Administrator personally conducted with regard to these

⁵ See discussion infra regarding the Medical Cannabis Dispensary Advisory Committee evaluations at Section F.

factors. As a result, UH is left with virtually no information about the basis or data upon which its application specifically was denied. As such, UH asks the Board of Supervisors, in its authority, to make its own factual determination of UH's application based upon its review of the application materials and the following:

E. Urban Hills Inc.'s Application Meets and Exceeds All Review Criteria of MCC 6.85.061 and the Six Components of the Application Guide

- (1) UH's team has 35+ years operating Bay Area dispensaries; and over 50 years of experience with California's medical cannabis collective

UH's advisory team and general manager include individuals with more than 35 combined years of direct dispensary operations experience with well-known, established, respected medical cannabis dispensaries in the Bay Area.

Specifically, Debby Goldsberry, UH's Operations Advisor & Consultant wrote the Operations Plan for UH's application based upon her 25-years of experience founding and operating award-winning dispensaries. (Application, p.3-5.) Most notably, Ms. Goldsberry founded Berkeley Patients Group, (one of the most highly respected and revered dispensaries in Berkeley, California) in 1999, and directed the operation for 11 years. Currently, Ms. Goldsberry is the Executive Director for Magnolia Wellness, a highly regarded dispensary operating in Oakland. Simply put, no one knows more about how to operate a dispensary or has been doing so longer than Ms. Goldsberry. Not only is this expertise infused into the operations plan, but the General Manager of Magnolia Wellness – David McCullick, will serve as General Manager of UH, working to implement the very best industry standards and practices into the UH operations. Mr. McCullick himself has more than 10-years experience starting and operating fully compliant medical cannabis dispensaries on a day-to-day basis, including D&M Compassion Center in Clearlake and Sonoma Patient Group in Santa Rosa. As set forth in the Project Narrative, Business Plan, and Operations Plan, Mr. McCullick will be directly involved in setting up and managing UH's operations to ensure that it conforms to these standards and practices.

As BOS Members have seen first hand during their investigation, dispensaries of this caliber are not loose operations allowing just anyone to walk in the door, nor are they operations of ill repute that are magnets for crime. To the contrary, they are clean, professional, tightly secured, and a benefit to their communities. UH's commitment to the same high level of operating standards is evident from the team it has assembled and the careful, thoughtful business and operations plans provided.

In addition, Dustin and Crystal Pebbles, the owners and corporate management team of UH each have been working with and consulting with medical cannabis collectives in California for over a decade, both as the founders of a Sonoma County-based garden supply and plant nutrient supply company and cultivation operations consulting company. Not only do The Pebbles understand the industry and how to operate in compliance with the law, but their deep experience with cannabis cultivators and producers means that they are uniquely well qualified to bring the very best, organically-grown products that are free of toxic chemicals and pesticides to Marin County's patient base. This is a critical to evaluating applicant experience and public safety.

Indeed, a dispensary's quality of service ultimately is only as good as the product it provides to patients. During the next year or more that California's marketplace remains largely unregulated (until full state regulation is implemented beginning in 2018), it is imperative that the people selecting products for Marin's patients know what they are doing and with whom they are dealing. The Pebbles, who are deeply committed and involved in the California cannabis community are these experts. For them, medical cannabis is not a novelty project, a real estate development, another asset holding of a publicly traded company, or an opportunistic business venture conceived since Proposition 64 was approved. These are passionate cannabis experts and small North Bay business owners (and parents themselves of two elementary school age children), who have a documented and demonstrated history of relevant medical cannabis experience in California. Additionally, it is important to note that in 2014 The Pebbles were granted by the State of Nevada one of the few medical cannabis production licenses after a highly competitive, rigorous application process, thus illustrating their competence as operators as determined by another licensing authority.

As such, it is clear from the application materials and supporting documentation that the UH management and operations team has not only has the deep expertise in all matters relevant to a successful, exceptional operation in Tam Valley, but the level and quality of experience far exceeds the basic operating requirements of the Ordinance. UH is the right operator for Tam Valley.

(2) UH's application received no public opposition; Its location is fully compliant with the Ordinance and is comprised of an existing, freestanding, fully enclosed, secure location with no contingencies.

UH application is the only applicant receiving public comment that did not receive specific public opposition. That is, of the 851 total public responses received for Tam Valley (with a population of roughly 11,000⁶), not one of them specifically opposed the location at 230 Shoreline Highway or UH's application. (Evaluations, pp. 2,3.) UH's location meets all requirements of MCC 6.85.041 and is the ideal Tam Valley location for a medical cannabis dispensary for the following reasons:

- (a) **No contingencies:** UH's location is the only Tam Valley site with no contingencies. The building, site, and parking are fully controlled by UH under the terms of an extended lease agreement. Neither the building or site plans require: (a) adjustments to the Master Plan; (b) zoning changes; (c) major construction; or (d) the renewal of any lease agreements by any private or public authority (Application, pp. 22);
- (b) **Low Impact to Neighborhood:** The building is set back from the street and the proposed improvements are designed to have a low-impact, low key appearance not readily apparent to passersby, including minors, as anything other than a nondescript medical office or other average business located in the densely commercial area of Shoreline Highway. The site was specifically designed with Marin County and the surrounding environment in mind. (Application, pp. 22-23, Site Plan; see also Exhibit D hereto).

⁶ See fn. 1.

- (c) **Secure:** The building is a stand-alone structure with a fully enclosed perimeter lending itself to UH's detailed Security Plan (designed by Cannaguard, the industry's best security consultant), which provides for a tightly secured 24-hour monitored security camera surveillance as well as on-site security personnel during business hours. (Application: Business Plan (Appendix C, Security Plan), pp. 41-45; Additional Materials, Cannaguard Security Assessment.)
- (d) **Parking:** The proposed site plan more than doubles the current parking, with the potential for additional parking expansion as needed. (Application pp. 23; Site Plan pp. 1-4.) Moreover, the Operations Plan specifically calls for on-site security staff to directing traffic and assist with parking to get cars off the roadway quickly and safely and, if needed during certain hours, providing valet parking to increase efficiency of in and egress. (Application: Management and Operations Plan, pp. 42-43.)
- (e) **Traffic:** 230 Shoreline previously housed a dog daycare and boarding facility, which saw in and outflows of cars *during peak commutes* of roughly 50-75 cars per day. Since that time, a highly trafficked grocery store has opened in Tam Junction. As noted, security staff will be posted outside the building during business hours managing and directing traffic and parking to get cars in and out quickly and safely. In addition, UH's plan is designed specifically to reduce its own impacts during peak commutes by adjusting its operating hours and providing incentives for off-peak visits, use of the delivery service, alternate modes of transportation, and express ordering and pick up (Application, pp. 3.) As such, specific measures have and will be implemented to mitigate traffic impacts. The result is a project that creates no significant additional impact to traffic patterns at this location than already exists in Tam Junction.

(3) UH's Operations Plan is exhaustive, detailed, and based upon the very best industry standards

UH's application includes a comprehensive Management and Operations Plan keyed to the Ordinance requirements that breaks down operations step-by-step, detailing how each process will be created, implemented and supervised. (See Management and Operations Plan, pp. 1-137.) This detailed plan includes six chapters addressing: General Operations, Inventory Management, Patient and Caregiver Registration and Recordkeeping, Point of Sale Operations, Staffing and Security, and includes 104 separately detail policies and procedures, detailed Staffing and Security Plans, and Employee Handbook. (*Id.* at Table of Contents). A simple review of the table of contents of the manual clearly demonstrates the exhaustive nature of the plan and the considerations made by Ms. Goldsberry and her team, based on their vast dispensary operation experience (*see discussion supra.* at Section E(1).)

As but one example, the plan includes 13 procedures to implement a policy to ensure "No Redistribution of Cannabis Medicines Provided" including the following categories: "Creation an implementation of policy preventing illegal distribution of medical cannabis" (3 procedures); "Educating members about this policy" (4 procedures); "Packaging all medical cannabis with a warning against redistribution" (1 procedure); "Observing, interrupting, and reporting violations of the policy" (2 procedures); "No vendors may sell cannabis to our members" (1 procedure); and "Maintaining good neighbor and police relations" (2 procedures) (Application: Management and Operations Manual, pp. 13-15). This attention to detail is consistent throughout the Operations Plan and Manual.

As a result, no reasonable objective evaluation of UH's Operations Plan can credibly assert that it does not meet and exceed the Ordinance requirements, which itself only lists 19 separate requirements for operating standards. UH's plan describes in detail how it meets each of these, and then provides additional policies and procedures, not required by the Ordinance, but necessary for UH to adhere to best industry operating standards.

(4) UH's Business Plan and Project Narrative describe a financially feasible, community-responsive, patient-centered operation

UH's application includes a detailed and comprehensive Business Plan and Project Narrative that meets every aspect and detail required of the Ordinance and Application Guide. (Application: Business Plan, pp. 1-23.) The purpose of which is to provide the licensing authority with assurance that the operation fits the size and scale of the operation and patient need, and that the operation is financially feasible and adequately capitalized. UH's thoughtful, measured, conservative plan exceeds all of these requirements.

In detail, UH's application describes the fully: (1) the scope of the work proposed including estimated costs (and timeline) to build, operate, compensate employees, equipment costs, utility costs, and other operations (Application: Business Plan, pp. 20-23); (2) partnerships and adequate capitalization and financing, including the use of highly skilled financial experts as advisory committee members and providing three years of financial statements and tax returns (*Id.*, pp.6, 20-23; Additional Materials (Financial Statements, Tax Returns, Proof of Funds, Contracts, Articles of Organization and Operating Agreements submitted)); (3) information about the property, location, and relationship to the owner (Application, p.4; Business Plan pp. 2, 8); and (4) specifically how the UH (the only nonprofit entity applicant in Tam Valley) conforms to State and local laws requiring the business to operate as a non-profit (See Articles of Incorporation and Bylaws; Business Plan, pp. 2, 3, 7; Management and Operations Plan p. 2).

Additionally, UH's application provides data demonstrating that the operating plan fits with the type and scale of the proposed dispensary, by use of a detailed Marin County market analysis relative to the inventory needed in relationship to the Ordinance's inventory limitations. (Business Plan pp. 12-15.) In sum, UH's Business Plan fully meets and exceeds all requirements of the business planning and financial feasibility requirements of the Ordinance.

(5) UH's Public Benefits Plan fully addresses every factor requested by the County

The Application Guide includes several items that applicants may include as part of a "Public Benefits Plan" that are designed "[t]o further demonstrate the exceptional merits of a proposed Application." (Application Guide, p. 5.) These factors and procedures are not required by the Ordinance, (See Ordinance 3639), which is not noted to diminish their importance, but to give proper context to the BOS determination of whether UH's application exceeds the requirements of the Ordinance generally. Necessarily, to the extent UH application meets any of the public benefit considerations after meeting all requirements of the Ordinance, its application "exceeds" the code requirements. In fact, UH's Public Benefits plan meets nearly all the requirements, and adequately addresses the remaining Marin County residency factor. (Application: Business Plan (Appendix B, Public Benefits Plan), pp. 34-39.) Specifically:

- a) **Living Wage and Unionization:** As set forth in the Public Benefits Plan, UH is committed to adhering to compensation policies that are consistent with the County's Living Wage Ordinance (*see id.* p.34). To the extent portions of the employee handbook or business plan fell short or were inconsistent, CEO Dustin Pebbles provided clarification to County staff (See Exhibit E) confirming that UH was in negotiations with UFCW toward a Memorandum of Understanding under which Urban Hills will negotiate a union contract that meets the living wage standard including health benefits. A card check neutrality agreement has since been executed and MOU negotiations are well under way. (See Exhibit F);
- b) **Community Relations:** UH's plan provides both for an on-site community relations staff person (Public Benefits Plan, pp. 35) and two Tam Valley community members on the Advisory Committee to the Board of Directors to ensure that UH and staff is responsive to the needs of the neighborhood and local community. (Application: Business Plan, p. 6) Additionally, traffic control measures and policies are specifically designed to integrate public input. (Application: Management and Operations Plan, pp. 42-43) (*See also*

discussion supra. at Section E(2)(d),(e)) Demonstrating their commitment to public input, prior to the January 31 Hearing, The Pebbles held open office hours to sit and talk one-on-one with anyone interested in discussing the project or providing feedback, which hours they advertised in the Pacific Sun newspaper (See comments made during January 31 Hearing);

- c) **Substance Abuse Education:** UH's application provides for a multi-faceted approach to community education and substance abuse awareness that includes policies and procedures to (1) implement an education awareness plan regarding the potential cannabis abuse and of the signs and symptoms to patients, caregivers, and staff; (2) observe and assist patient members showing signs of potential abuse including compassionate dialogue and referral to professional assistance; and (3) identifying community groups and agencies to with which UH can work to proactively prevent cannabis abuse by its members. (Public Benefits Plan, p. 36.)

- d) **Green Business Certification:** UH is committed to seeking and maintain Green Business Certification, including implementing conservation methods, systems, and equipment, publicizing and promoting its Green Business practices and educating the public and community businesses about such policies and certification. Additionally, UH's site plan includes a use of a drought tolerant bioswale around the perimeter and parking areas of the building. (Public Benefits Plan, p. 37.)

- e) **Labeling:** In strict adherence to industry best practices and to-be-implemented state law, UH will clearly and conspicuously label all products in tamper-resistant packaging that includes: (1) the source and date of manufacture; (2) a list of all pharmacologically active ingredients including THC, CBD, and other cannabinoids; (3) net weight of dried weight flower; (4) nut and allergen warnings; (4) the use of only generic food names for edible products; (4) warnings about the intoxicating effects of cannabis; and (5) packaging and designs that are not designed to be attractive to children.

(Public Benefits Plan, p. 38; See also Management and Operations Plan, pp. 75-77.)

- f) **Marin County Residency:** Finally, though The Pebbles do not reside in Marin County, they are long time Sonoma County business owners and residents (until last year when they moved to Sacramento County to be midway between their Nevada facility and Marin County). The Pebbles know and understand the North Bay community well and have deep connections to the area. Moreover, they have made every effort to hire Marin County architects (Crafted Earth; San Rafael), attorneys (Nicole Howell Neubert; unincorporated Marin (Bel-Tiburon)), and ancillary businesses in preparing their application materials. (Public Benefits Plan, p. 34.) They are committed to hiring Marin County businesses to implement the construction, and County residents to staff the dispensary. (*Id.*) Additionally, as noted, the Advisory Committee will include two Tam Valley residents to advise management regarding local neighborhood issues and concerns (specifically including traffic and parking). (Application: Business Plan, p. 6);

In all regards, Urban Hills Public Benefit Plan provides multiple examples of the exceptional merits of its application, adding to the exemplary core components of UH's proposal.

- (6) UH's Plan is specifically designed with the community in mind; the project does not create or present adverse impacts to the health, peace or safety of the surrounding community, create a public nuisance, increase minors' access to cannabis

In all the ways discussed, UH's plan is designed to create the lowest physical and cultural impacts to the Tam Valley community.

Health, Peace, Safety; Preventing Nuisance: All policies have been conceived and will be implemented to ensure that no "Nuisance" is created or tolerated – defined by the Ordinance as "disturbances of peace, open public consumption of cannabis or

alcohol, excessive pedestrian or vehicular traffic, illegal drug activity, harassment of passersby, 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.” (MCC 6.85.042 (N)(b).)

While the Ordinance only requires that “reasonable steps” be taken which includes “calling the Sherriff in a timely manner and requesting those engaging in objectionable activities to cease,” UH’s Operations and Security Plans go well beyond these requirements. Policies are designed to ensure no nuisance is created and to react immediately and strongly to any situation that indicates such a nuisance. Specifically, the building, sign, and façade are designed to blend with the neighborhood and not to draw undue attention or to emphasize the nature of its business; operating hours do not include late nights or early morning; traffic patterns are to be minimized through specific policies; and security includes 24-hour video surveillance as well as on-site security personnel monitoring the in and out flows of cars, ensuring proper parking, and patient intake. (See discussion, *supra*. at Section E(2).)

Several other securities measures have been designed to have a zero tolerance policy for loitering, littering, illegal drug activity, and public consumption, including a reporting program to track and monitor any patient member who attempts to linger at or around the facility or who consumes or attempts to consume on premises; as well as robust policies and procedures to ensure safety of all during product deliveries, locking up and opening the facility, and labeling and packaging. (Application: Business Plan (Appendix C, Security Plan), p. 45; see also Management and Operations Plan.)”

Reducing Minors Access to Cannabis: Specifically with regard to the concern or suggestion that a UH’s operation will “increase minors’ access to cannabis”, this is a matter the BOS understands well. Children have access to cannabis currently in Marin County – through the illicit market. Naturally, Marin County must do its best to eradicate this element and to thwart minors’ access to any illegal substances. Such outcome is the paramount purpose of state regulation (including both the MCRSA and Proposition 64) – to eliminate the incentive for consumers to purchase from the illegal markets thus eliminating their reach. Regulation and control of licensed businesses *by local*

governments enhances public safety and minimizes access to the black market by all, minors principally.

This is because the tightly controlled environment of a highly regulated cannabis dispensary like UH's proposed operation puts the local government in control and completely eliminates the possibility of any unauthorized person obtaining cannabis from this location. The security and intake measures are real as anyone how has ever visited a well run dispensary can attest. Literally, no one is allowed into the facility who does not have a medical recommendation and whose identity has not been verified. (Application: Operations Plan, p. 49.) This includes even in the parking lot or front door, as on-site security personnel are specifically tasked with first screening patrons for a valid patient recommendation and valid identification. (*Id.*)

There is no data, evidence presented, or findings made in the NOD suggesting a licensed dispensary will increase children's access to cannabis. UH – like state lawmakers, regulators, local governments, and law enforcement officials – contends that the opposite is true: Regulating and licensing equals control, which approach protects kids far better than continuing to allow the totally unfettered, unregulated marketplace for cannabis existing in Marin today.

Finally, to the extent that any of the comprehensive operating procedures outlined by UH's plan do not adequately address any particular concern of the BOS or County officials, the licensing authority is specifically authorized to "conditionally approve", or to "impose conditions, restrictions or require revisions to the proposal to comply with the purpose and intent of [the Ordinance]." ((MCC 6.85.060(B); 6.85.062(C).) UH welcomes any such sensible conditions.

F. **MCDAC Evaluations**

With regard to the Advisory Committee Evaluations, it is unclear (1) what, if any, objective criteria or numerical scoring scale was used to determine the "Yes" and "No" evaluations in the Application Evaluation Summary Matrix ("Matrix") (Evaluations, p. 5) or the "Exceeds," "Sufficient," or "Deficient" determinations in the "Ordinance Standards Technical Review Summary" (Evaluations, p. 9) (despite the Application Guide's clear

directive that the "MCDAC is...to numerically rank and score the proposals"); (2) whether the ultimately qualitative, subjective determinations were made by consensus, majority, or unanimous vote of the 5-member panel (only three of whom were present for the Tam Valley Public hearing); or (3) whether the determinations are based upon public sentiment as perceived by the panel and/or on the MCDAC's review of the application materials. Additionally, the County Administrator's decision states that his decision was based only on these evaluations as they relate to evaluating public inputs, and yet failed to reflect the fact that Urban Hills received no specific public opposition. Nevertheless, to the extent they were considered by the County Administrator or are considered by the BOS, UH notes that not only are these evaluations vague, subjective, and with no supporting information, they are internally or otherwise contradictory with regard to UH's application. Specifically:

(1) The Matrix (page 5) states "No" for the category "Applicant Experience, Background" and on page 9 states "Applicant and General Manager have experience running dispensaries," "Applicants have small business experience." No concerns regarding experience are noted.

(2) The Matrix (page 5) states "No" for "Site" and in contradiction on page 9 lists gives "Site and Improvement Plan" and "Security Plan" each a "Sufficient" rating, and notes no issues with the site other than "Site is within Flood Zone AE" and "8 [parking spaces] are proposed to back out onto Shoreline Hwy". These are red herrings. First, all locations in the Tam Valley area are located in the Flood Zone AE⁷ and there is no criteria in the Ordinance or otherwise suggesting this is relevant or impacts in any respect the feasibility of this operation or public safety. Second, the eight parking spaces are not

⁷ From Marin County Watershed Program at http://www.marinwatersheds.org/flood_control_zones.html "Zone 3 includes a large portion of the Southern Marin draining to Richardson Bay including the City of Mill Valley, and numerous unincorporated communities including Alto, Sutton Manor, Almonte, Tamalpais Valley, Homestead Valley, and portions of Strawberry Point. The County Board of Supervisors formed Flood Control Zone 3 in 1956 to address the area adjacent to Richardson Bay's vulnerability to flooding from creek and tidal action. The Zone includes Richardson Bay and its many drainage areas tributary to the Bay including: Coyote Creek, Corte Madera del Presidio, and Warner Creek. Maintenance activities include regular servicing of pump stations, tidegates, levees and drainage ditches, and an annual vegetation maintenance program."

new or "proposed": they are existing spaces currently in use already approved by the County, and do not back out onto Shoreline Highway as there is a sufficient buffer zone allowing cars to back out safely from their space (and with the help of on-site security staff) without crossing the line onto Shoreline Highway. Third, page 9 states under "Strengths", "Proposing to open at 10am to reduce traffic impact during peak commute. Includes a delivery service" and "Good access and response times for emergency services." Fourth, as noted above, UH's application is the only Tam Valley location receiving public inputs that did not receive any specific public opposition. (Evaluations, p. 3.)

(3) MCDAC's assessment that the Business Plan is "Deficient" is based on no information other than "business plan is deficient and does not include employee benefits, vacation, or medical." (Evaluations, p. 9.) The extent to which the Business Plan meets and exceeds the requirements of the Ordinance as well as UH's demonstrated and documented commitment to employee benefits are noted above (See *inter alia* Section E(2).)

(4) MCDAC's evaluation that the Operating Plan is "Deficient" similarly is based on no information. (Evaluations, p. 9.) Rather, under "Strengths" it is noted "Applicants and General Manager have experience running dispensaries" and "included all administrative policies and procedures in application as well as employee handbook." (*Id.*)

(5) The evaluation that the Public Benefits Plan is "Deficient" is based upon nothing other than the statement "Public Benefits Plan's outreach and community involvement was very limited. Did not meet living wage standards," and "Applicants are not Marin residents." (Evaluations, p. 9.) The extent to which the Plan in fact meets and exceeds every aspect of the public benefits plan (except Marin residency, which is discussed) is noted above. (See *inter alia* Section E(2).) Additionally, not only did CEO Dustin Pebbles address the MCDAC's concern during the hearing with regard to living wage stating that UH was in fact committed to a living wage (as stated in the Public Benefits Plan) and that the employee handbook was not meant to suggest otherwise, but UH as noted above, provided a follow up letter confirming same including information that it was in negotiations with UFCW toward (a Memorandum of Understanding under

Based on the foregoing, all documents and records referenced, and the public hearing on this appeal, Urban Hills respectfully requests the Board of Supervisors exercise its authority and grant this appeal from the County Administrator's decision denying Urban Hills cannabis dispensary application, and grant Urban Hills a license to operate at 230 Shoreline Highway, under any conditions or restrictions it may impose.

Respectfully submitted,



Nicole Howell Neubert

- cc: Mr. Matthew H. Hymel, Marin County Administrator
Mr. Dustin Pebbles, CEO, Urban Hills, Inc.
Ms. Crystal Pebbles, COO, Urban Hills, Inc.
Mr. George Kim, Owner, 230 Shoreline Highway

EXHIBIT A

ORDINANCE NO. 3639
AN ORDINANCE OF THE MARIN COUNTY BOARD OF SUPERVISORS
TO LICENSE MEDICAL CANNABIS DISPENSARIES IN UNINCORPORATED MARIN
COUNTY BY ADDING CHAPTER 6.85 MEDICAL CANNABIS DISPENSARIES TO THE
MARIN COUNTY CODE

SECTION I. FINDINGS

The Board of Supervisors of the County of Marin ordains as follows.

- I. The voters of the State of California approved Proposition 215 (codified as Health and Safety Code Section 11362.5 et seq.) entitled "The Compassionate Use Act of 1996" (Act). The intent of Proposition 215 was to enable persons residing in California who are in need of cannabis for medical purposes to be able to obtain and use it without fear of criminal prosecution under limited, specified circumstances.
- II. The State enacted SB 420 in 2004, being Sections 11362.7 et seq., of the Health and Safety Code, being identified as the Medical Cannabis Program, (Program), to clarify the scope of the Compassionate Use Act of 1996 and to allow cities, counties and other governing bodies to adopt and enforce rules and regulations consistent with the Program.
- III. The California Medical Marijuana Regulation and Safety Act (CMMRSA) was passed by the state legislature on September 11, 2015 and signed into law by the Governor on October 9, 2015. The Marin County Cannabis Dispensary Ordinance is intended to serve as a program in conjunction with implementation of the CMMRSA.
- IV. To protect the public health, safety, and welfare, it is the desire of the Board of Supervisors to modify the Marin County Code consistent with the Program, regarding the location and operation of medical cannabis dispensaries and to meet the medical needs of those residing in the county.
- V. It is the Board of Supervisor's intention that nothing in this chapter shall be deemed to conflict with federal law as contained in the Controlled Substances Act, 21 U.S.C. Section 841, to otherwise permit any activity that is lawfully and constitutionally prohibited under that Act. Nothing in this chapter is intended to grant immunity from criminal prosecution under Federal law. This ordinance does not protect users, caregivers, or the owners of properties from Federal prosecution, or from having their property seized by Federal authorities under the Federal Control Substances Act.
- VI. It is the Board of Supervisor's intention that nothing in this chapter shall be construed to (1) allow persons to engage in conduct that endangers others or causes a public nuisance; (2) allow the use of cannabis for nonmedical purposes; or (3) allow any activity relating to the cultivation, distribution, or consumption of cannabis that is otherwise illegal.
- VII. Pursuant to California Health and Safety Code Section 11362.71 et seq., the State Department of Health through the county's Department of Health and Human Services, is to be responsible for establishing and maintaining a voluntary medical cannabis identification card program for qualified patients and primary caregivers.
- VIII. California Health and Safety Code Section 11362.71(b) requires every county health department, or its designee, to implement a procedure to accept and process applications from those seeking to join the identification program in the matters set forth in Section 11362.71 et seq.

IX. This chapter is found to be categorically exempt from environmental review pursuant to CEQA Guidelines Section 15061(b) (3) in that the Board of Supervisors finds and determines that there is nothing in this chapter or its implementation that could foreseeably have any significant effect on the environment.

SECTION II. ACTION

NOW, THEREFORE, BE IT RESOLVED that the Marin County Board of Supervisors hereby adopts Ordinance No. 3639 and adds Chapter 6.85 Medical Cannabis Dispensaries to the Marin County Code, consisting of Exhibit "A" to Marin County Ordinance No. 3639.

SECTION III: EFFECTIVE DATE

This ordinance shall be and is hereby declared to be in full force and effect as of sixty (60) days from and after the date of its passage and shall be published before the expiration of fifteen (15) days after its passage, with the names of the supervisors voting for and against the same in the INDEPENDENT JOURNAL, a newspaper of general circulation published in the County of Marin.

SECTION IV: VOTE

Introduced at a regular meeting of the Board of Supervisors held on the 10th day of November 2015, and adopted by the Board of Supervisors of the County of Marin, State of California, on the 8th day of December, 2015, by the following vote to wit:

AYES: SUPERVISORS Judy Arnold, Steve Kinsey, Damon Connolly, Kathrin Sears,
Katie Rice

NOES: NONE

ABSENT: NONE



KATIE RICE, PRESIDENT
MARIN COUNTY BOARD OF SUPERVISORS

ATTEST: 
Clerk

EXHIBIT "A" TO MARIN COUNTY ORDINANCE NO. 3639

Marin County Code Chapter 6.85 Medical Cannabis Dispensaries

Section: 6.85.010 Findings.

- I. The voters of the State of California approved Proposition 215 (codified as Health and Safety Code Section 11362.5 et seq.) entitled "The Compassionate Use Act of 1996" (Act).
- II. The intent of Proposition 215 was to enable persons residing in California who are in need of cannabis for medical purposes to be able to obtain and use it without fear of criminal prosecution under limited, specified circumstances.
- III. The State enacted SB 420 in 2004, being Sections 11362.7 et seq., of the Health and Safety Code, being identified as the Medical Cannabis Program, (Program), to clarify the scope of the Compassionate Use Act of 1996 and to allow cities, counties and other governing bodies to adopt and enforce rules and regulations consistent with the Program.
- IV. The California Medical Marijuana Regulation and Safety Act (CMMRSA) was passed by the state legislature on September 11, 2015 and signed into law by the Governor on October 9, 2015. The Marin County Cannabis Dispensary Ordinance is intended to serve as a program in conjunction with implementation of the CMMRSA.
- V. To protect the public health, safety, and welfare, it is the desire of the Board of Supervisors to modify the Marin County Code consistent with the Program, regarding the location and operation of medical cannabis dispensaries and to meet the medical needs of those residing in the county.
- VI. It is the Board of Supervisor's intention that nothing in this chapter shall be deemed to conflict with federal law as contained in the Controlled Substances Act, 21 U.S.C. Section 841, to otherwise permit any activity that is lawfully and constitutionally prohibited under that Act. Nothing in this chapter is intended to grant immunity from criminal prosecution under Federal law. This ordinance does not protect users, caregivers, or the owners of properties from Federal prosecution, or from having their property seized by Federal authorities under the Federal Control Substances Act.
- VII. It is the Board of Supervisor's intention that nothing in this chapter shall be construed to (1) allow persons to engage in conduct that endangers others or causes a public nuisance; (2) allow the use of cannabis for nonmedical purposes; or (3) allow any activity relating to the cultivation, distribution, or consumption of cannabis that is otherwise illegal.
- VIII. Pursuant to California Health and Safety Code Section 11362.71 et seq., the State Department of Health through the county's Department of Health and Human Services, is to be responsible for establishing and maintaining a voluntary medical cannabis identification card program for qualified patients and primary caregivers.
- IX. California Health and Safety Code Section 11362.71(b) requires every county health department, or its designee, to implement a procedure to accept and process applications from those seeking to join the identification program in the matters set forth in Section 11362.71 et seq.
- X. This chapter is found to be categorically exempt from environmental review pursuant to CEQA Guidelines Section 15061(b) (3) in that the Board of Supervisors finds and determines that there is nothing in this chapter or its implementation that could foreseeably have any significant effect on the environment.

Section: 6.85.011 Purpose and intent.

It is the purpose and intent of this chapter to regulate medical cannabis dispensaries in order to promote the health, safety, and general welfare of residents and businesses within the County. It is neither the intent nor the effect of this chapter to condone or legitimize the use of cannabis.

Section: 6.85.020 Definitions.

For the purpose of this chapter, the following words and phrases shall mean:

- (A) "Applicant" means a person who is required to file an application for a license under this chapter, including an individual owner, managing partner, or agent of a dispensary.
- (B) "County" means the County of Marin.
- (C) "County Administrator" means the County Administrator of the County of Marin or the authorized representative thereof.
- (D) "Dispensary License" means the authority granted by the County of Marin to a Dispensary Licensee to dispense medical cannabis as a medication, and is limited to the Dispensary Licensee, and not the land.
- (E) "Dispensary Licensee" means the person (1) to whom a dispensary license is issued and (2) who is identified in California Health and Safety Code Section 11362.7, subdivision (c) or (d), or (e) or (f).
- (F) "Drug paraphernalia" shall have the same definition as California Health and Safety Code Section 11362.5, and as may be amended.
- (G) "Identification card" shall have the same definition as California Health and Safety Code Section 11362.5 et seq., and as may be amended.
- (H) "Medical cannabis dispensary," hereinafter "dispensary," shall be construed to include any association, cooperative, affiliation, or collective of persons where multiple qualified patients and/or primary care givers, are organized to provide education, referral, or network services, and facilitation or assistance in the lawful, retail distribution of medical cannabis. "Dispensary" means any facility or location where the primary purpose is to dispense medical cannabis (i.e., marijuana) as a medication that has been recommended by a physician and where medical cannabis is made available to and/or distributed by or to two or more of the following: a primary caregiver and/or a qualified patient, in strict accordance with California Health and Safety Code Section 11362.5 et seq. A dispensary shall not include dispensing by primary caregivers to qualified patients in the following locations and uses, as long as the location of such uses are otherwise regulated by this Code or applicable law: a clinic licensed pursuant to Chapter 1 of Division 2 of the Health and Safety Code, a health care facility licensed pursuant to Chapter 2 of Division 2 of the Health and Safety Code, a residential care facility for persons with chronic life-threatening illness licensed pursuant to Chapter 3.01 of Division 2 of the Health and Safety Code, residential care facility for the elderly licensed pursuant to Chapter 3.2 of Division 2 of the Health and Safety Code, a residential hospice, or a home health agency licensed pursuant to Chapter 8 of Division 2 of the Health and Safety Code, as long as any such use complies strictly with applicable law including, but not limited to, Health and Safety Code Section 11362.5 et seq., or a qualified patient's or caregiver's place of residence.

- (I) "Medical cannabis patient collective," hereinafter "patient collective," shall be defined the same as "dispensary," but does not operate in a "retail" capacity. As such, "patient collectives" are exempt from the provisions of this chapter.
- (J) "Person" means any individual, partnership, co-partnership, firm, association, joint stock company, corporation, limited liability company or combination of the above in whatever form or character.
- (K) "Person with an identification card" shall have the same definition as set forth in California Health and Safety Code Section 11362.5 et seq., and as they may be amended from time to time.
- (L) "Primary caregiver" shall have the same definition as set forth in California Health and Safety Code Section 11362.5 et seq., and as may be amended.
- (M) "Qualified patient" shall have the same definition as set forth California Health and Safety Code Section 11362.5 et seq., and as they may be amended from time to time.
- (N) "Review authority" refers to the County Administrator who is designated by this ordinance as having the responsibility and authority to review, approve or deny Dispensary licenses.
- (O) "School" means an institution of learning for minors, whether public or private, offering a regular course of instruction required by the California Education Code. This definition includes an elementary school, middle or junior high school, senior high school, or any special institution of education, but it does not include a vocational or professional institution of higher education, including the College of Marin and any other college or university.
- (N) "Youth-oriented facility" means a public park with play lots, playgrounds, athletic fields, and other amenities that are intended for use by minors or where the individuals who regularly use the facility are predominantly minors.

Section: 6.85.030 Dispensary license required to operate.

It is unlawful for any person to engage in, conduct or carry on, or to permit to be engaged in, conducted or carried on, in or upon any premises in the County the operation of a dispensary unless the person first obtains and continues to maintain in full force and effect a dispensary license from the County as required in this chapter.

Section: 6.85.031 Term of licenses and renewals required.

- (A) Licenses issued under this chapter shall expire two years following the date of their issuance, and renewable after January 1, 2018 subject to compliance with the California Medical Marijuana Regulation and Safety Act (CMMRSA).
- (B) Licenses may be renewed by the County Administrator for additional periods of at least one year in length upon application by the licensee, unless the license is suspended or revoked in accordance with the provisions of this chapter or if the application for renewal fails to comply with the provisions of this chapter.
- (C) Applications for renewal shall be made at least 45 days before the expiration date of the license and shall be accompanied by the nonrefundable application fee referenced herein. Applications for renewal shall be acted on as provided herein for action upon applications for permits.
- (D) Applications for renewal made less than 45 days before the annual expiration date shall not stay the expiration date of the license.

(E) Licenses may be revoked or suspended by the County Administrator or Board of Supervisors at any time, as provided in this chapter and the County Code.

Section: 6.85.032 General tax liability.

An operator of a dispensary shall also be required to apply for and obtain a general County tax certificate or exemption as a prerequisite to obtaining a license pursuant to the terms hereof, as required by the State Board of Equalization.

Section: 6.85.033 Imposition of fees.

Every application for a license shall be accompanied by a nonrefundable fee, as established by resolution of the Board of Supervisors from time to time. This application fee shall not include fingerprinting, photographing, and background check costs and shall be in addition to any other business license fee or license fee imposed by this code or other governmental agencies. The fee shall be sufficient to cover the full cost borne by the County to administer the Dispensary Licensing program and all responsibilities established in this Chapter. Fingerprinting, photographing, and background check fees will be as established by resolution adopted by the Board of Supervisors from time to time.

Section: 6.85.040 Limitations on number of dispensaries.

(A) Up to two (2) Dispensary Licenses may be issued in each of the two (2) License Zones defined below, for a total of up to four (4) Dispensary Licenses in the unincorporated areas of Marin County, and on file in the Community Development Agency.

Zone A (Highway 101 Corridor): Unincorporated areas in the Countywide Plan's City-Centered Corridor.

Zone B (Central/West Marin): Unincorporated areas in the Countywide Plan's Inland Rural and Coastal Corridors.

Section: 6.85.041 Limitation on location of dispensary.

- (A) A dispensary may only be located within commercial designated areas of the County's general plan (Countywide Plan) and more specifically within the following zoning districts: C1, CP, C-CP, VCR, and C-VCR. In addition to the Dispensary License, the applicant shall obtain all land use permits required by the zoning district and comply with all applicable County ordinances.
- (B) A dispensary shall be in a highly visible location that provides good views of the dispensary entrance, windows and premises from the public street.
- (C) A dispensary shall not be allowed in the following areas at the time of its permitted establishment:
- (1) Within 800 feet of a youth-oriented facility, a school, a smoke-shop which sells paraphernalia for consuming drug or tobacco products, or another dispensary; or
 - (2) Within any residential zoned parcel, or any property with an underlying residential or mobile homes general plan land use designation.

- (D) The distance between a dispensary and above listed uses shall be made in a straight line from the boundary line of the property on which the dispensary is located to the boundary of the property on which the building or structure in which the above listed use occurs or is located.

Section: 6.85.042 Operating requirements.

Dispensary operations shall be established and managed only in compliance with the following standards:

- (A) Criminal History. Any applicant, his or her agent or employees, or any person exercising managerial authority of a dispensary on behalf of the applicant shall not have been convicted of a felony, or of a misdemeanor involving moral turpitude, or engaged in misconduct related to the qualifications, functions or duties of a licensee. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere.
- (B) Minors.
- (1) It is unlawful for any licensee, operator, or other person in charge of any dispensary to employ any person who is not at least 18 years of age.
 - (2) Persons under the age of 18 shall not be allowed on the premises of a dispensary unless they are a qualified patient or a primary caregiver and they are in the presence of their parent or guardian.
 - (3) The entrance to a dispensary shall be clearly and legibly posted with a notice indicating that person under the age of 18 are precluded from entering the premises unless they are a qualified patient or a primary caregiver and they are in the presence of their parent or guardian.
- (C) Operating Hours. Dispensaries may operate between the hours of 9:00 a.m. to 9:00 p.m. up to seven days per week unless the reviewing authority imposes more restrictive hours due to specific considerations for a particular location. The basis for any restriction on hours shall be specified in any license issued.
- (D) Dispensary Size and Access.
- (1) Dispensary size shall be limited, as deemed appropriate and necessary, to best serve patient needs within the intent of this chapter and reduce potential adverse impacts that might otherwise occur on surrounding neighborhoods, businesses and demands on County services. The County may limit the number of patients at a particular location if there is shown to be adverse impacts to the surrounding neighborhoods, businesses and demands on County services due to the number of patients being served.
 - (2) A dispensary shall not be physically increased in size (i.e., floor area or buildings utilized) without a prior approval amending the existing dispensary license.
 - (3) The entrance into the dispensary shall be locked at all times with entry strictly controlled; e.g., a buzz-in electronic/mechanical entry system is required. A viewer shall be installed in the door that allows maximum angle of view of the exterior entrance.
 - (4) Security personnel shall be employed to monitor site activity, control loitering and site access.
 - (5) Only dispensary staff, primary caregivers, qualified patients and persons with bona fide purposes for visiting the site shall be permitted at a dispensary.
 - (6) Potential patients or caregivers shall not visit a dispensary without first having obtained a valid written recommendation from their physician recommending use of medical cannabis.

(7) Only a primary caregiver and qualified patient shall be permitted in the designated dispensing area with dispensary personnel. All other authorized visitors shall remain in the designated waiting area in the front entrance/lobby.

(E) Dispensary Supply. A dispensary may possess no more than eight ounces of dried cannabis per qualified patient or primary caregiver, and maintain no more than six mature or 12 immature cannabis plants per qualified patient or primary caregiver. However, if a qualified patient or primary caregiver has a physician's recommendation that this quantity does not meet the qualified patient's medical needs, the dispensary may possess an amount of cannabis consistent with the patient's needs.

(F) Dispensing Operations.

(1) A dispensary shall dispense medical cannabis to meet monthly medication needs of qualified patients, similar to typical pharmacy operations. The dispensary shall strongly discourage daily or weekly visits by patients as a routine practice. The dispensary may offer incidental services, such as delivery of medical cannabis to members who are qualified members and testing of cannabis for potency, molds, fungi, and other contaminants.

(2) A dispensary shall only dispense to qualified patients or caregivers with a currently valid physician's approval or recommendation in compliance with the criteria in California Health and Safety Code Section 11362.5 et seq.

(3) Prior to dispensing medical cannabis, the dispensary shall obtain and maintain verification from the recommending physician that the individual requesting medical cannabis is a qualified patient.

(4) A dispensary shall not have a physician on-site to evaluate patients and provide a recommendation for medical cannabis.

(5) Patient records shall be maintained on-site and verified as needed, which is determined to be at least every 12 months or upon expiration of the verification on file if it expires sooner than 12 months with the qualifying patient's physician or doctor of osteopathy.

~~(6) Information on prior years' operations, including the results of independent financial audits confirming compliance with the requirements of this section, shall be provided annually to the review authority, as required in this chapter. The operator shall adjust the operations as necessary to address issues.~~

(G) Consumption Restrictions.

Cannabis shall not be consumed on the premises of the dispensary by any member of the public, including a qualified patient. The term "premises" includes the actual building, as well as any accessory structures, parking areas, or other surroundings within 200 feet of the dispensary's entrance. Dispensary employees who are qualified patients may consume cannabis within the enclosed areas of the building in designated spaces outside the presence of members of the public and provided that such consumption is by vaporization or oral consumption and not smoking.

(H) Retail Sales and Cultivation Prohibited.

(1) No cannabis shall be cultivated on the premises of the dispensary, except in compliance with Health and Safety Code Section 11362.5 et seq.

(2) Except as provided in subsection (3) below, no dispensary shall conduct or engage in the commercial sale of any product, good or service. The term "commercial sale" does not include the provision of medical cannabis on terms and conditions consistent with this chapter and applicable law.

- (3) No dispensary shall sell or display any drug paraphernalia or any implement that may be used to administer medical cannabis unless specifically authorized in its license. An applicant may request that up to 150 square feet be authorized to display or sell devices for administration of medical cannabis which may only be sold to qualified patients or primary caregivers or to sell other related products to qualified patients if the sale of such products is a use approved by the County Administrator to be in compliance with the County's zoning code and any other applicable state or local regulations.
- (4) A dispensary shall not cultivate, distribute or sell medical cannabis for a profit.
- (5) A dispensary shall not pay any supplier(s) of medical cannabis more than the costs incurred for cultivation and preparation.
- (6) A dispensary shall meet all the operating criteria for the dispensing of medical cannabis as is required pursuant to California Health and Safety Code Section 11362.5 et seq.

(I) Operating Plans.

- (1) Floor Plan. A dispensary shall have a lobby waiting area at the entrance to receive clients, and a separate and secure designated area for dispensing medical cannabis to qualified patients or designated caregivers. The primary entrance shall be located and maintained clear of barriers, landscaping and similar obstructions so that it is clearly visible from public streets, sidewalks or site driveways.
- (2) Storage. A dispensary shall have a suitable locked safe on premises, identified as a part of the security plan, for after-hours storage of medical cannabis.
- (3) Minimum Staffing Levels. The premises shall be staffed with at least one person during hours of operation who shall not be responsible for dispensing medical cannabis.
- (4) Odor Control. A dispensary shall have an air treatment system that ensures off-site odors shall not result.
- (5) Security Plans. A dispensary shall provide adequate security on the premises, as approved by the County Administrator, including lighting and alarms, to insure the safety of persons and to protect the premises from theft.
- (6) Security Cameras. Security surveillance cameras shall be installed to monitor all entrances and exterior of the premises to discourage loitering, crime, illegal or nuisance activities.
- (7) Security Video Retention. Security video shall be maintained for 7 days.
- (8) Alarm System. A professionally monitored robbery alarm system shall be installed and maintained in good working condition.
- (9) Emergency Contact. A dispensary shall provide the County Administrator with the name, phone number and facsimile number of an on-site community relations staff person to whom one can provide notice if there are operating problems associated with the dispensary. The dispensary shall 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 County.

(J) Signage and Notices.

- (1) The building entrance to a dispensary shall be 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.
- (2) Signs on the premises shall not obstruct the entrance or windows.

- (3) Address identification shall comply with County Code and Fire Department illuminated address signs bulletin.
- (4) Business identification signage shall be approved in accordance with the County's sign permit process and any other applicable ordinances with the additional requirement that signs shall not contain any logos or information that identifies, advertises or lists the specific products or services offered by the dispensary.
- (K) Employee Records. Each owner or operator of a dispensary shall maintain a current register of the names of all employees currently employed by the dispensary, and shall disclose such registration for inspection by any County officer or official for purposes of determining compliance with the requirements of this section.
- (L) Patient Records. A dispensary shall maintain records of all patients and primary caregivers using only the identification card number issued by the county, or its agent, pursuant to California Health and Safety Code Section 11362.71 et seq., as a protection of the confidentiality of the cardholders, or a copy of the written recommendation from a physician or doctor of osteopathy stating the need for medical cannabis.
- (M) Staff Training. Dispensary staff shall receive appropriate training for their intended duties to ensure understanding of rules and procedures regarding dispensing in compliance with state and local law, and properly trained or professionally-hired security personnel.
- (N) Site Management.
- (1) The operator of the establishment shall take all reasonable steps to discourage and correct objectionable conditions that constitute a nuisance in parking areas, sidewalks, alleys and areas surrounding the premises and adjacent properties during business hours if directly related to the patrons of the subject dispensary.
- (a) "Reasonable steps" shall include calling the sheriff in a timely manner; and requesting those engaging in objectionable activities to cease those activities, unless personal safety would be threatened in making the request.
- (b) "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) The operator shall take all reasonable steps to reduce loitering in public areas, sidewalks, alleys and areas surrounding the premises and adjacent properties during business hours.
- (3) The operator shall ensure that the hours of operation shall not be a detriment to the surrounding area.
- (4) The operator shall provide patients with a list of the rules and regulations governing medical cannabis use and consumption within the County and recommendations on sensible cannabis etiquette.
- (O) Trash, Litter, Graffiti.
- (1) The operator shall clear the sidewalks adjoining the premises plus 10 feet beyond property lines along the street as well as any parking lots under the control of the operator as needed to control litter, debris and trash.
- (2) The operator shall remove all graffiti from the premises and parking lots under the control of the operator within 72 hours of its application.

- (P) Compliance with Other Requirements. The operator shall comply with all provisions of all local, state or federal laws, regulations or orders, as well as any condition imposed on any permits issued pursuant to applicable laws, regulations or orders.
- (Q) Confidentiality. The information provided for purposes of this section shall be maintained by the County Administrator as confidential information, and shall not be disclosed as public records unless pursuant to a writ of mandate or subpoena issued by a court of competent jurisdiction.
- (R) Display of License. Every dispensary shall display at all times during business hours the license issued pursuant to the provisions of this chapter for such dispensary in a conspicuous place so that the same may be readily seen by all persons entering the dispensary.
- (S) Reporting and Payment of Fees. Each licensee shall file a sworn statement with the County Administrator indicating the number of patients served by the dispensary within the previous calendar year.

Section: 6.85.050 Application preparation and filing.

- (A) Application Filing. A complete application submittal packet shall be submitted including all necessary fees and all other information and materials required by the County and this chapter. All applications for licenses shall be filed with the County Administrator, using forms provided by the County, within the filing period that is established by the County Administrator, and which may be extended from time to time. It is the responsibility of the applicant to provide information required for approval of the license. The application shall be made under penalty of perjury.
- (B) Eligibility for Filing. Applications may only be filed by the owner of the subject property, or person with a written authorization from the owner to file an application for the intended use.
- (C) Filing Date. The filing date of any application shall be the date when the County receives the last submission of information or materials required in compliance with the submittal requirements specified herein.
- (D) Effect of Incomplete Filing. Upon notification that an application submittal is incomplete, the applicant shall be granted an extension of time to submit all materials required to complete the application within 30 days. If the application remains incomplete in excess of 30 days the application shall be deemed withdrawn and new application submittal shall be required in order to proceed with the subject request, unless an extension. The time period for granting or denying a license shall be stayed during the period in which the applicant is granted an extension of time.
- (E) Effect of Other Permits or Licenses. The fact that an applicant possesses other types of state or County permits or licenses does not exempt the applicant from the requirement of obtaining a Dispensary License.
- (F) Submittal Requirements. Any application for a license shall include the following information.
 - (1) Applicant(s) Name. The full name (including any current or prior aliases, or other legal names the applicant is or has been known by, including maiden names), present address, and telephone number of the applicant;
 - (2) Applicant(s) Mailing Address. The address to which notice of action on the application is to be mailed;
 - (3) Previous Addresses. Previous addresses for the past five years immediately prior to the present address of the applicant;
 - (4) Verification of Age. Written proof that the applicant is over the age of 18 years of age;
 - (5) Physical Description. Applicant's height, weight, color of eyes and hair;

- (6) Photographs. Passport quality photographs for identification purposes;
- (7) Employment History. All business, occupation, or employment of the applicant for the five years immediately preceding the date of the application;
- (8) Tax History. The dispensary business tax history of the applicant, including whether such person, in previously operating in this or another city, county or state under license has had a business license revoked or suspended, the reason therefor, and the business or activity or occupation subsequent to such action of suspension or revocation;
- (9) Management Information. The name or names and addresses of the person or persons having the management or supervision of applicant's business;
- (10) Criminal Background. A background investigation verifying whether the person or person having the management or supervision of applicant's business has been convicted of a crime(s), the nature of such offense (s), and the sentence(s) received therefore;
- (11) Employee Information. Number of employees, volunteers, and other persons who will work at the dispensary;
- (12) Statement of Dispensary Need. A statement and/or information to establish the need for the additional dispensary to serve qualified patients in the area;
- (13) Plan of Operations. A plan of operations describing how the dispensary will operate consistent with the intent of State law and the provisions of this chapter, including but not limited to:
 - (a) Ensuring cannabis is not purchased or sold by the dispensary in a manner that would generate a profit.
 - (b) Controls that will assure medical cannabis will be dispensed to qualifying patients or caregivers only.
 - (c) Controls that will ensure limitations on number of patients are adhered to.
 - (d) Controls that will ensure access to dispensary premises is adequately monitored and restricted to pre-approved qualified patients and caregivers.
 - (e) Method for ensuring that a qualified patient's physician is not recommending cannabis for less than medically appropriate reasons;
- (14) Written Project Description. A written description summarizing the proposed dispensary use size, number of patients, characteristics and intent;
- (15) Written Response to Dispensary Standards. The applicant shall provide a comprehensive written response identifying how the dispensary plan complies with the each of the standards for review in this chapter, specifically the limitation on number and size, limitation on location, and operating requirements sections;
- (16) Written Response to Criteria for Review Section. The applicant shall provide a written response indicating how each of the criteria for review has been satisfied;
- (17) Security Plan. A detailed security plan outlining the proposed security arrangements for insuring the safety of persons and to protect the premises from theft. The plan shall include installation of security cameras, a robbery alarm system monitored by a licensed operator, and a security assessment of the site conducted by a qualified professional;

- (18) Floor Plan. A sketch or diagram showing the interior configuration of the premises, including a statement of the total floor area occupied by the dispensary. The sketch or diagram need not be professionally prepared, but must be drawn to a designated scale or drawn with marked dimensions of the interior of the premises to an accuracy of plus or minus six inches;
- (19) Site Plan. A sketch or diagram showing exterior configuration of the premises, including the outline of all structures, parking and landscape areas, and property boundaries. The sketch or diagram need not be professionally prepared, but must be drawn to a designated scale or drawn with marked dimensions to an accuracy of plus or minus six inches;
- (20) Neighborhood Context Map. An accurate straight-line drawing depicting the building and the portion thereof to be occupied by the dispensary, all properties and uses within 800 feet of the boundaries of the property on which the dispensary permit is requested, and: (a) the property line of any dispensary within 800 feet of the primary entrance of the dispensary for which a license is requested, (b) the property line of any "smoke shop" within 800 feet of the primary entrance of the dispensary, and (c) the property lines of any school, park, or residential zone or use within 800 feet of the primary entrance of the dispensary;
- (21) Lighting Plan. A lighting plan showing existing and proposed exterior premises and interior lighting levels that would be the minimum necessary to provide adequate security lighting for the use;
- (22) County Authorization. Written authorization for the County, its agents and employees to seek verification of the information contained within the application and to enter the property to inspect the premises, conduct monitoring, and process the application;
- (23) Statement of Owners Consent. A statement in writing by the applicant that he or she certifies under penalty of perjury that the applicant has the consent of the property owner and landlord to operate a dispensary at the location;
- (24) Applicants Certification. A statement in writing by the applicant that he or she certifies under penalty of perjury that all the information contained in the application is true and correct;
- (25) Other Information. Such other identification and information as deemed necessary by the County Administrator to demonstrate compliance with this chapter and County Codes, including operating requirements established in this chapter.

Section: 6.85.060 Authority and responsibilities of review authority

The review authority shall have the following authority and responsibilities:

- (A) To perform all of the functions designated by this ordinance;
- (B) To review, approve, conditionally approve, renew, or deny Dispensary License applications in compliance with this ordinance;
- (C) To delegate the responsibilities of the review authority to staff in the Community Development Agency; and
- (D) To perform any other responsibilities assigned by the Board of Supervisors.

Section: 6.85.061 Criteria for review.

The review authority shall consider the following criteria in determining whether to grant or deny a dispensary license:

- (A) That the dispensary license is consistent with the intent of Proposition 215 and related State law, the provisions of this chapter and the County Code, including the application submittal and operating requirements herein.
- (B) That the dispensary location is not identified as having significant crime issues (e.g., based upon crime reporting district/statistics as maintained by the Sheriff).
- (C) That there have not been significant numbers of calls for police service, crimes or arrests in the area or to an existing dispensary location.
- (D) That an applicant or employee is not under 18 years of age.
- (E) That all required application materials have been provided and/or the dispensary has operated successfully in a manner that shows it would comply with the operating requirements and standards specified in this chapter.
- (F) That all required application fees have been paid and reporting requirements have been satisfied in a timely manner.
- (G) That an appropriate limit on size of the dispensary has been established and the requested license is in compliance with the provisions of this chapter and any other applicable State or local ordinance.
- (H) That the location is not prohibited by the provisions of this chapter or any local or state law, statute, rule or regulation and no significant nuisance issues or problems are anticipated or resulted.
- (I) That the site plan, floor plan, and security plan have incorporated features necessary to assist in reducing potential crime-related problems and as specified in the operating requirements section. These features may include, but are not limited to, security on-site; procedure for allowing entry; openness to surveillance and control of the premises; the perimeter, and surrounding properties; reduction of opportunities for congregating and obstructing public ways and neighboring property; illumination of exterior areas; and limiting furnishings and features that encourage loitering and nuisance behavior.
- (J) That no dispensary use, owner, licensee, agent, or employee has violated any provision of this chapter including grounds for suspension, modification or revocation of a license.
- (K) That all reasonable measures have been incorporated into the plan and/or consistently taken to successfully control the establishment's patrons' conduct resulting in disturbances, vandalism, crowd control inside or outside the premises, traffic control problems, ingesting cannabis in public, or creation of a public or private nuisance, or interference of the operation of another business.
- (L) That the dispensary would not adversely affect the health, peace or safety of persons living or working in the surrounding area, overly burden a specific neighborhood with special needs or high impact uses, or contribute to a public nuisance; or that the dispensary has resulted in repeated nuisance activities including disturbances of the peace, illegal drug activity, ingesting cannabis in public, 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 detentions or arrests.
- (M) That any provision of the County Code or condition imposed by a County issued license, or any provision of any other local, State or Federal law, regulation, or order, or any condition imposed by licenses issues in compliance with those laws has not been violated.
- (N) That the applicant has not violated any local or State law, statute, rule or regulation respecting the distribution, possession, or consumption of cannabis.

- (O) That the applicant has not knowingly made a false statement of material fact or has knowingly omitted to state a material fact in the application for a license.
- (P) That the applicant, his or her agent or employees, or any person who is exercising managerial authority on behalf of the applicant has not been convicted of a felony, or of a misdemeanor involving moral turpitude, or has engaged in misconduct related to the qualifications, functions or duties of a licensee. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere.
- (Q) That the applicant has not engaged in unlawful, fraudulent, unfair, or deceptive business acts or practices.

Section: 6.85.062 Investigation and action on application.

After the making and filing of a complete application for the Dispensary License and the payment of the fees, the County Administrator shall conduct a background check of the applicant and all employees and conduct an investigation of the application, and take action as follows:

- (A) The County Administrator shall refer the application to any other County departments as necessary to complete his or her investigation into the application. The County Administrator may appoint a committee comprised of representatives of County departments that is responsible for reviewing license applications and making an advisory recommendation to the County Administrator on the merit of each application. The committee may also include representatives with knowledge and expertise in areas related to medical cannabis, including, but not limited to, familiarity with California law, the Attorney General's guidelines on Medicinal Cannabis, security, and financial management. The committee shall conduct at least one public workshop to receive testimony about the license applications before making the advisory recommendation to the County Administrator.
- (B) Within 90 days after receipt of a completed application, the County Administrator shall either grant or deny the application in accordance with the provisions of this chapter.
- (C) In approving a Dispensary License, the County Administrator may impose conditions, restrictions or require revisions to the proposal to comply with the purpose and intent of this chapter. The applicant is responsible for paying a financial deposit to cover all costs incurred by the County in the administration of the Dispensary License, including condition compliance review, and investigation of complaints.
- (D) The County Administrator shall cause a written notice of his or her decision to issue or deny a license to be mailed to the applicant by U.S. mail.
- (E) Notwithstanding the provisions of this section, the County Administrator, in his or her discretion, may refer an application for a license to the Board of Supervisors for a decision within 90 days after the receipt of a completed application.
- (F) That all required application fees have been paid and reporting requirements have been satisfied in a timely manner.

(G) Section: 6.85.063 Appeal from County Administrator's determination.

Section: 6.85.063 Appeal from County Administrator's determination.

- (A) An applicant aggrieved by the County Administrator's decision to issue, deny, or renew a license may appeal such decision to the Board of Supervisors by filing a written notice stating all grounds on which the appeal is based and paying applicable appeal fee with the Clerk of the Board of Supervisors within 10 business days of the County Administrator's written notice of decision. If an appeal is not taken within such time, the County Administrator's decision shall be final.
- (B) The Board of Supervisors shall consider the appeal within 90 days of the date of filing the appeal. The Clerk of the board shall give 10 days' notice to the person filing the appeal of the time and place of the meeting scheduled on the appeal by serving notice personally or by depositing it in the United States post office at San Rafael, California, postage prepaid, addressed as shown on the appeal papers. The Board of Supervisors shall have the authority to determine all questions raised on such appeal. No such determination shall conflict with any substantive provision of this chapter.

Section: 6.85.064 Effect of revocation.

When the County Administrator shall have revoked any license provided for in this chapter and the time for appeal to the Board of Supervisors shall have elapsed, or, if after appeal to the Board of supervisors, the decision of the County Administrator has been affirmed by the Board of Supervisors, no new application for a license shall be accepted from the applicant and no such license shall be issued to such person or to any corporation in which he shall have any beneficial interest for a period of three years after the action revoking the license.

Section: 6.85.065 Suspension and revocation.

- (A) Any license issued under the terms of this chapter may be suspended or revoked by the County Administrator or Board of Supervisors for cause, including but not limited to, violation of any of the requirements or provisions of this chapter including the criteria for review and operating requirements sections, or conflicts with State law.
- (B) Except as otherwise provided in this chapter, no license shall be revoked or suspended by virtue of this section until written notice of the intent to consider revocation or suspension of the license has been served upon the person to whom the license was granted at least 10 days prior to the date set for such review. Such notice shall contain a brief statement of the grounds to be relied upon for revoking or suspending such license. Notice may be given either by personal delivery to the person to be notified, or by depositing it in the U.S. mail in a sealed envelope, postage prepaid, return receipt requested, addressed to the person to be notified at his/her address as it appears in his/her application for a license.
- (C) If any person holding a license or acting under the authority of such license under this chapter is convicted of a public offense in any court for the violation of any law which relates to his or her license, the County Administrator may revoke such license forthwith without any further action thereof, other than giving notice of revocation to the licensee.

- (D) The licensee may appeal the County Administrator's decision to suspend or revoke the license to the Board of Supervisors by filing a written notice stating all grounds on which the appeal is based and paying applicable appeal fee with the Clerk of the Board of Supervisors within 10 business days of the County Administrator's written notice of decision. If an appeal is not taken within such time, the County Administrator's decision shall be final.
- (E) The Board of Supervisors shall consider the appeal within 90 days of the date of filing the appeal. The Clerk of the board shall give 10 days' notice to the person filing the appeal of the time and place of the meeting scheduled on the appeal by serving notice personally or by depositing it in the United States post office at San Rafael, California, postage prepaid, addressed as shown on the appeal papers. The Board of Supervisors shall have the authority to determine all questions raised on such appeal. No such determination shall conflict with any substantive provision of this chapter.

Section: 6.85.066 Transfer of Licenses.

- (A) A licensee shall not operate a dispensary under the authority of a dispensary permit at any place other than the address of the dispensary stated in the application for the permit.
- (B) A licensee shall not transfer ownership or control of a dispensary or transfer a dispensary permit to another person unless and until the transferee obtains an amendment to the permit from the County Administrator stating that the transferee is now the licensee. Such an amendment may be obtained only if the transferee files an application with the County Administrator in accordance with this all provisions of this chapter accompanied by a transfer fee in an amount set by resolution of the Board of Supervisors, and the County Administrator determines in accordance this chapter that the transferee would be entitled to the issuance of an original permit.
- (C) No license may be transferred when the County Administrator has notified the licensee that the license has been or may be suspended or revoked.
- (D) Any attempt to transfer a license either directly or indirectly in violation of this section is declared void, and the license shall be deemed revoked.

Section: 6.85.070 Violations.

- (A) It is unlawful for any person, individual, partnership, co-partnership, firm, association, joint stock company, corporation, limited liability company or combination of the above in whatever form or character to violate any provision or fail to comply with any of the requirements of this chapter.
- (B) A violation of this chapter shall be punished in accordance with the County Code.

Section: 6.85.071 Remedies cumulative.

All remedies prescribed under this chapter shall be cumulative and the use of one or more remedies by the County shall not bar the use of any other remedy for the purpose of enforcing the provisions hereof.

Section: 6.85.072 Separate offense for each day.

Any person that violates any provision of this chapter shall be guilty of a separate offense for each and every day during any portion of which any such person commits, continues, permits, or causes a violation thereof, and shall be penalized accordingly.

Section: 6.85.073 Public nuisance.

Any use or condition caused or permitted to exist in violation of any of the provisions of this chapter shall be and is declared a public nuisance and may be summarily abated by the County.

Section: 6.85.074 Criminal penalties.

Any person who violates, causes, or permits another person to violate any provision of this chapter commits a misdemeanor.

Section: 6.85.075 Civil injunction.

The violation of any provision of this chapter shall be and is declared to be contrary to the public interest and shall, at the discretion of County Administrator, create a cause of action for injunctive relief.

Section: 6.85.076 Administrative remedies.

In addition to the civil remedies and criminal penalties set forth above, any person that violates the provisions of this chapter may be subject to administrative remedies as set forth by the Marin County Code:

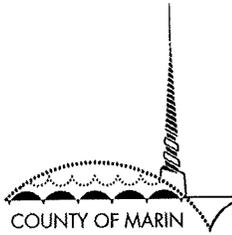
Section: 6.85.077 Severability.

The provisions of this chapter are declared to be severable. If any provision, clause, word, sentence, or paragraph of this chapter or the application thereof to any person, establishment, or circumstances shall be held invalid, such invalidity shall not affect the other provisions of this chapter.

Section: 6.85.078 Judicial review.

Judicial review of a decision made under this chapter may be had by filing a petition for a writ of mandate with the Superior Court in accordance with the provisions of the California Code of Civil Procedure Section 1094.5. Any such petition shall be filed within 90 days after the day the decision becomes final as provided in California Code of Civil Procedure Section 1094.6 which shall be applicable for such actions.

EXHIBIT B



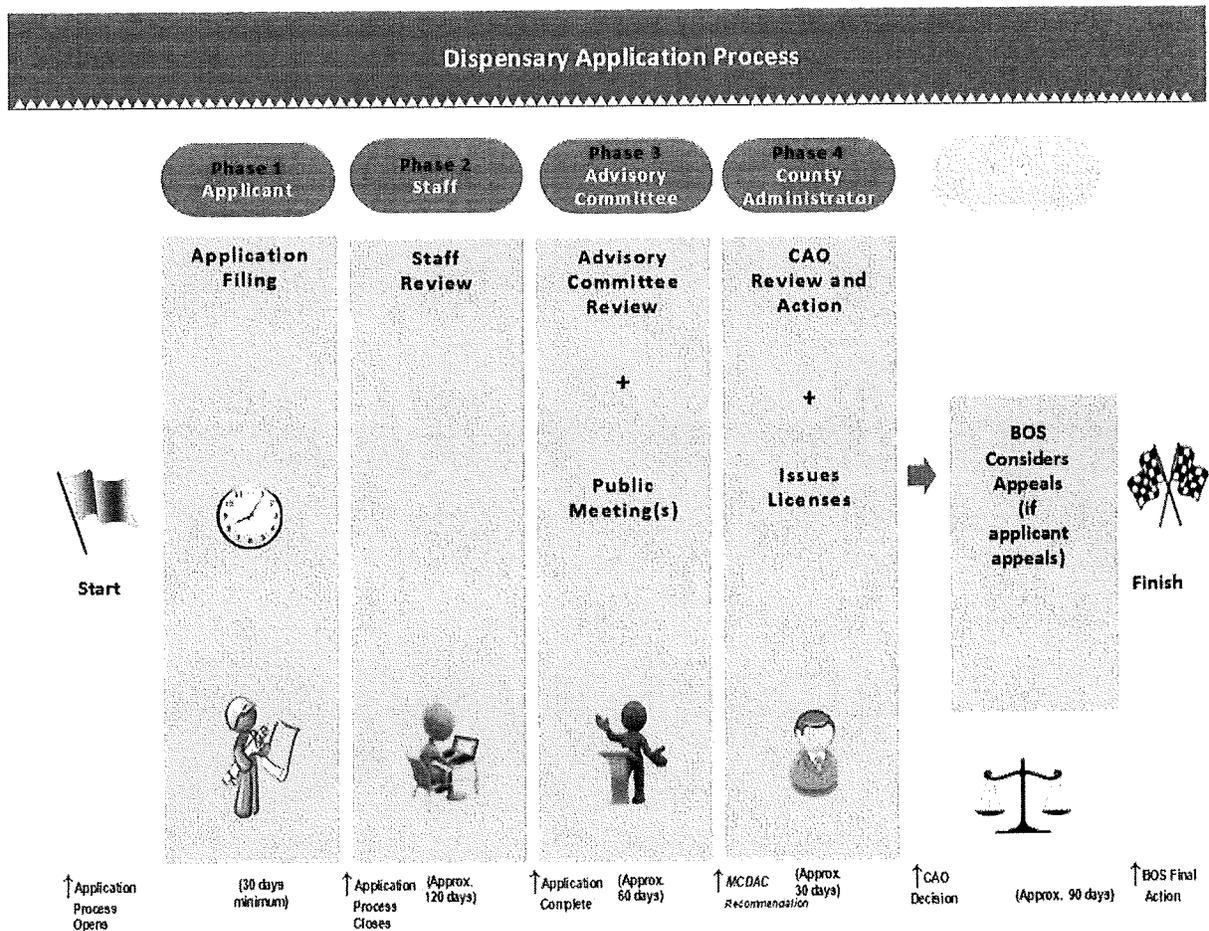
COMMUNITY DEVELOPMENT AGENCY

Marin County Medical Cannabis Dispensary Program Dispensary Application Guide

On December 8, 2015, the Marin County Board of Supervisors adopted Ordinance 3639 which established regulations allowing for licensing up to four medical cannabis dispensaries in the unincorporated areas of Marin County. The Dispensary Application Guide outlines the process and criteria used by the County to select the best qualified medical cannabis dispensary operators and sites. Applicants will compete for the Dispensary Licenses, and the program will be administered consistent with Proposition 215 and the California Compassionate Use Act.

Overview

The application process includes the following four (4) phases: (1) Application Filing; (2) Staff review; (3) Advisory Committee review; and (4) County Administrator decision.



1. Application Filing (Phase 1)

The Community Development Agency will open the initial and all subsequent filing periods for Dispensary Licenses for a period of no less than 30 days, and notify interested parties, including subscribers to the County's webpage for the Medical Cannabis Dispensary Program (<http://www.marincounty.org/main/medical-cannabis-dispensary-ordinance>). The County will only accept applications for Dispensary Licenses during the noticed time period(s). Applications filed outside of the noticed time periods will be rejected. The Community Development Agency will also conduct at least one briefing with prospective Applicants to discuss the submittal requirements, timeline, and process prior to the close of the application intake period.

Submittal Requirements

The Dispensary License Application ("Application") is comprised of six (6) components.

All applicants are required to submit a completed Application and non-refundable application review fee using the forms provided by the Community Development Agency. The Application shall include the following signed declarations from the appropriate entities: (1) a statement by the applicant that he or she certifies under penalty of perjury that all the information contained in the application is complete and accurate; (2) a statement by the property owner (if different from the applicant) that he or she certifies under penalty of perjury that the applicant has his/her consent to submit an Application at the proposed site; and (3) a statement by the applicant and property owner (if different from the applicant) that grants authorization for the County, and its agents and employees, to seek verification of the information contained within the Application and to enter the property to inspect the premises and process the Application.

The following application submittal materials shall be provided.

- One completed and signed original copy of the "Marin County Medical Cannabis Dispensary Application" form, 10 photocopies of the completed and signed form, and one electronic (pdf) copy of the completed and signed form.
- Application fees as required by Board of Supervisors Resolution 2016-40.
- Ten copies of complete sets of plans not to exceed 24 inches by 36 inches, collated and folded to a size no larger than 11 inches by 17 inches, plus one set of reduced plans no larger than 11 inches by 17 inches, and one pdf of all plan sheets. The reduced plan set shall include a scale conversion that allows approximate measurements to be made. All plans shall identify the name(s) of the plan preparer and be dated.
- Ten copies and an electronic (pdf) copy of all supplemental documents shall be submitted. Documents shall not exceed a size of 11 inches by 17 inches, with minimum font size of 12 points. All documents shall be clearly labeled with the name of the applicant and address of the proposed dispensary, pages numbered, either typed or written in blue or black ink, and shall be accompanied by an electronic (pdf) version of all documents.
- The application shall be accompanied by an index that cross-references responses to all application submittal items to the exact document and/or location where the information is provided. Please see attached example.

A. Applicant Information

- 1) Name of Applicant. The full name (including any current or prior aliases, or other legal names the applicant is or has been known by, including maiden names), present address, and telephone number of the applicant and evidence that the applicant is also a qualified Patient/Caregiver. "Applicant" includes an individual owner, managing partner/principal, operator, or anyone with an ownership or other proprietary interest in a dispensary. As used herein, the term "applicant" is also to be construed to include its use in the plural (applicants). If the applicant is a corporation or business entity, submit the Articles of Incorporation and Bylaws that have been previously filed with the State of California and a signed declaration by an officer who is also a qualified Patient/Caregiver. In case of joint venture or other joint-prime relationships, an officer of each venture partner shall be listed as co-applicants;
- 2) Mailing Address. The address to which all correspondence about the Application is to be mailed;
- 3) Previous Addresses. Previous addresses for the past three years immediately prior to the present address of the applicant;
- 4) Age Verification. Written proof that the applicant is over the age of 18 years of age;
- 5) Physical Description. Applicant's height, weight, color of eyes and hair;
- 6) Photographs. Passport quality photographs for identification purposes;
- 7) Employment History. All business, occupation, or employment of the applicant for the three years immediately preceding the date of the application;
- 8) Tax History. Any business tax history of the applicant, including whether such person(s), in previously operating in this county, a city within Marin County, or another city, county or state under license has had a business license and/or zoning permit revoked or suspended, and the reason therefor, and the business or activity or occupation subsequent to such action of suspension or revocation;
- 9) Management Information. The name or names and addresses of the person or persons having the management or supervision of applicant's business;
- 10) Criminal Background. A live scan submission for the applicant. This includes, at a minimum, a background investigation verifying whether the person or person having the management or supervision of applicant's business has been convicted of a crime(s), the nature of such offense (s), and the sentence(s) received therefore;
- 11) Employee Information. Anticipated number of employees, volunteers, and other persons who will work at the dispensary;

B. Project Narrative and Business Plan

The applicant shall submit a project narrative that describes the business model and plans, including a summary of the proposed location of the dispensary, dispensary size, number of patients, purpose, and a statement and/or information that establishes the need for the proposed dispensary to serve qualified patients in the area. The narrative shall also include a comprehensive written response demonstrating compliance with Ordinance 3639, including how the Application complies with each of the standards and criteria for review, and include relevant information that demonstrates the applicant's knowledge of local, state, and federal laws governing medical cannabis.

The Business Plan shall provide details of the entity that is seeking to obtain the Dispensary License, and articulate the full scope of work proposed, partnerships, property and location, relationship to

property owner, and provide details of the day-to-day operation of the dispensary. The Business Plan shall also explain how the proposal will conform to State and County laws relative to the business operating as a not-for-profit entity.

The applicant shall submit a schedule outlining the timeline for any proposed construction and improvements and the type and number of building and other construction permits that are required, along with a general timeline for opening the dispensary.

The applicant shall demonstrate sufficient capital in place to build, secure, and start up the proposed dispensary. Such costs shall include applicable County fees. The applicant shall demonstrate sufficient financing to cover construction, start-up, equipment, and packaging. Financial information shall include estimated costs to build, operate, compensate employees, equipment costs, utility costs, and other Operations and Management, as needed. Applicants shall provide three-year Pro Formas and the following documents to substantiate their ability to operate the dispensary:

- 1) A description of the source and uses of the capitalization funds, and how the funds are to be expended; and
- 2) Three years of Audited Financial Statements and Tax Returns for Corporate entities that have been in existence for three or more years; for entities in existence fewer than three years, documentation establishing the entity (such as Articles of Incorporation) and three years of Financial Statements and Tax Returns from at least two Management Members.

C. Operating Plan

The applicant shall submit a plan of operations describing how the dispensary will operate consistent with the intent of State and County law and the provisions of this chapter, including but not limited to:

- 1) Ensuring cannabis is not purchased or sold by the dispensary in a manner that would generate a profit;
- 2) Controls that will assure medical cannabis will only be dispensed to qualifying patients or caregivers;
- 3) Controls that will ensure limitations on number of patients are adhered to;
- 4) Controls that will ensure access to dispensary premises is adequately monitored and restricted to pre-approved qualified patients and caregivers; and
- 5) Method for ensuring that a qualified patient's physician is not recommending cannabis for other than medically appropriate reasons.

D. Site and Improvement Plans

The applicant shall submit plans of the property that is proposed for the dispensary, including the following:

- 1) **Site Plan.** A sketch or diagram showing the exterior configuration of the premises, including the outline of all structures, parking, trash disposal, and landscape areas, and property boundaries. The sketch or diagram need not be professionally prepared, but must be drawn to a designated scale or drawn with marked dimensions to an accuracy of plus or minus six inches with all parking/delivery/loading areas and paths of travel that comply with the Americans with Disabilities Act clearly labeled and dimensioned;
- 2) **Neighborhood Context Map.** An accurate straight-line drawing depicting the building and the portion thereof to be occupied by the dispensary, all properties and uses within 1,000 feet of the boundaries of the property on which the dispensary permit is requested, and: (a) the property line of any dispensary within 800 feet of the primary entrance of the dispensary for which a license is

requested, (b) the property line of any "smoke shop" within 800 feet of the primary entrance of the dispensary, and (c) the property lines of any school, park, or residential zone or use within 800 feet of the primary entrance of the dispensary;

- 3) Floor Plan. A sketch or diagram showing the interior configuration of the premises, including a statement of the total floor area occupied by the dispensary. The sketch or diagram need not be professionally prepared, but must be drawn to a designated scale or drawn with marked dimensions of the interior of the premises to an accuracy of plus or minus six inches; and
- 4) Lighting Plan. A lighting plan showing existing and proposed exterior premises and interior lighting levels that would be the minimum necessary to provide adequate security lighting for the use.

E. Security Plan

The applicant shall submit a detailed security plan outlining the proposed security arrangements for assuring the safety of persons and to protect the premises from theft and robbery. The plan shall include general security policies for the facility, employee specific policies, training, sample written policies, transactional security, visitor and neighborhood security, and security for delivery services. The plan shall include the location/placement of all physical components of the security plan (including installation of security cameras and a robbery alarm system monitored by a licensed operator), and a security assessment of the site conducted by a qualified professional. Plans shall consider all potential security threats and plan for any contingency needed for these situations. The County may limit the amount of information about the proposed security plan that is available for public review and comment.

F. Public Benefits Plan

To further demonstrate the exceptional merits of a proposed Application, applicants are requested to submit a Public Benefits Plan which addresses the following considerations:

- 1) Whether the dispensary will be locally owned where more than 50% of the ownership interest is by a resident living in the County of Marin;
- 2) Whether the dispensary will adhere to compensation policies that are consistent with the County's Living Wage Ordinance (Marin County Code Chapter 2.50) for staff and employees;
- 3) Whether the dispensary agrees not to interfere with employees' decisions to unionize, thereby being a "card check neutral" facility;
- 4) Whether the dispensary will implement a community relations program with staff who are assigned as points of contact to address neighborhood concerns, and if so, details of such a program;
- 5) Whether the dispensary will implement an educational awareness program that explains the benefits and potential abuses of cannabis, and to provide information and/or referrals to substance use disorder education, prevention, and treatment programs, and if so, details of such a program;
- 6) Whether the dispensary will seek and maintain certification as a Marin County Green Business;
- 7) Whether the dispensary will offer a reduced pricing plan for qualified low income patients and military veterans who are Marin County residents, and if so, the level of subsidy that will be provided to the qualified patients; and
- 8) Whether the dispensary will implement the following minimum labeling and warning requirements from the State's Medical Marijuana Regulation Safety Act: (a) labeling all medical cannabis product and placing them in a tamper-evident package; (b) including source and date of manufacture and cultivation prominently displayed and in a clear and legible font; (c) listing pharmacologically active ingredients including tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content; (d) using generic food names to describe edible medical cannabis products; (e) referencing to "medical use only and Schedule I Controlled Substance" on packages; (f) identifying the net weight of the medical cannabis for packages containing only dried flower; (g) adding warnings if nuts or other known allergens are used; (h) adding warnings about the medicine's intoxicating effects; and (i) ensuring that packages and labels use designs that are not attractive to children.

2. Staff Review (Phase 2)

The Staff Review phase includes two subphases.

The first subphase involves a review of the Application package to ensure it contains all required information and is deemed complete. Applicants who submitted all required elements will be notified, generally within 120 days of filing, that their application is complete and accepted for processing or rejected. The applicant may be required to submit clarifications and/or additional information in order to get a complete application. Upon notification that an application submittal is incomplete, generally within 30 days of filing, the applicant will be granted an extension of time not to exceed 30 additional days to submit all materials required to complete the application. If the application remains incomplete in excess of 30 days the application shall be rejected, unless an extension is granted based on receipt of an extension request from the applicant prior to the expiration of the 30-day time period. The time period for granting or denying a license shall be stayed during the period in which the applicant is granted an extension of time. The decisions governing completeness and extensions are final and not appealable.

The second subphase involves a review of the completed application by a Staff Review Panel, comprised of County staff and/or experts who will comment on the applications within their respective areas of expertise. The panel members will be selected by the Community Development Agency Director and may include, but are not necessarily limited to, those with expertise in land use planning, public safety, sustainability, building codes, finance, and law enforcement/security. The staff review panel will evaluate the relative strengths and weaknesses of each Application and forward its comments, within approximately 30 days, to the Medical Cannabis Dispensary Advisory Committee ("MCDAC"). The comments made by the Staff Review Panel are final and cannot be appealed.

3. Medical Cannabis Dispensary Advisory Committee Review (Phase 3)

The County Administrator will appoint a minimum 5-member Medical Cannabis Dispensary Advisory Committee (MCDAC). Committee members may include, but are not necessarily limited to, current or past elected officials of public agencies in Marin County, County/City administrators, and County/City Community Development/Planning Directors. Members may also include health professionals and/or patient advocates and members with expertise in law enforcement, prosecution, or defense. The MCDAC is charged with reviewing the comments from the Staff Review Panel, to convene public meeting(s) to receive public input on the applications, to numerically rank and score the proposals, and to make its recommendation to the County Administrator, generally within 60 days from receipt of the comments from the Staff Review Panel. At least 10 days prior to the public meeting(s), notices will be mailed to owners of properties located within 1,000 feet from the exterior property boundaries of the sites that are proposed as dispensaries, distributed electronically to all subscribers to the County's Medical Cannabis Dispensary website (<http://www.marincounty.org/main/medical-cannabis-dispensary-ordinance>), and published in the Marin Independent Journal. The Community Development Agency Director may also provide additional notice of the MCDAC meeting(s), as necessary or desirable, such as posting notices in public locations within a community. Applicants will be invited to make a presentation of their applications before the MCDAC and to answer questions from the MCDAC. The MCDAC will also invite comments from the public. Within 30 days following the public meeting, the MCDAC will issue its final recommendations to the County Administrator. The recommendations made by the MCDAC are final and cannot be appealed.

4. County Administrator Review and Action

The County Administrator will review each Application and consider comments from the staff review committee and the recommendations from the MCDAC prior to issuing a Notice of Decision.

- The County Administrator shall either grant or deny the Application in accordance with the provisions of

Ordinance 3639 or refer an Application for a license to the Board of Supervisors, generally within 30 days from receipt of the recommendations from the MCDAC.

- In approving a Dispensary License, the County Administrator may impose conditions, restrictions or require revisions to the proposal to comply with the purpose and intent of Ordinance 3639. The applicant is responsible for paying a financial deposit to cover all costs to be incurred by the County in the administration of the Dispensary License, including condition compliance review, and investigation of complaints.
- The County Administrator shall cause a written notice of his or her decision to issue or deny a Dispensary License to be mailed to the applicant by U.S. mail.

Review Criteria

The Notice of Decision shall include findings relative to the following review criteria:

- A. That the Dispensary License is consistent with the intent of Proposition 215 and related State law, and the provisions of Ordinance 3639, including the application submittal and operating requirements herein.
- B. That the dispensary location is not identified as having significant crime issues (e.g., based upon crime reporting district/statistics as maintained by law enforcement agencies).
- C. That there have not been significant numbers of calls for police service, crimes or arrests in the area or to an existing dispensary location.
- D. That an applicant or employee is not under 18 years of age.
- E. That all required application materials have been provided and/or how the dispensary will be operated successfully in a manner that shows it would comply with the operating requirements and standards specified in Ordinance 3639.
- F. That all required application fees have been paid and reporting requirements have been satisfied in a timely manner.
- G. That an appropriate limit on size of the dispensary has been established and the requested license is in compliance with the provisions of Ordinance 3639 and any other applicable State or local ordinance.
- H. That the location is not prohibited by the provisions of Ordinance 3639 or any local or state law, statute, rule or regulation and no significant nuisance issues or problems are anticipated or resulted.
- I. That the site plan, floor plan, and security plan have incorporated features necessary to assist in reducing potential crime-related problems and as specified in the operating requirements section. These features may include, but are not limited to, security on-site; procedure for allowing entry; openness to surveillance and control of the premises; the perimeter, and surrounding properties; reduction of opportunities for congregating and obstructing public ways and neighboring property; illumination of exterior areas; and limiting furnishings and features that encourage loitering and nuisance behavior.
- J. That no dispensary use, owner, licensee, agent, or employee has violated any provision of Ordinance 3639 including grounds for suspension, modification or revocation of a license.
- K. That all reasonable measures have been incorporated into the plan and/or consistently taken to successfully control the establishment's patrons' conduct resulting in disturbances, vandalism, crowd control inside or outside the premises, traffic control problems, ingesting cannabis in public, or creation of a public or private nuisance, or interference of the operation of another business.
- L. That the dispensary would not adversely affect the health, peace or safety of persons living or working in the surrounding area, overly burden a specific neighborhood with special needs or high impact uses, or contribute to a public nuisance; or that the dispensary has resulted in repeated nuisance activities

including disturbances of the peace, illegal drug activity, ingesting cannabis in public, harassment of passersby, excessive littering, excessive loitering, illegal parking, excessive loud noises, especially late at night or early in the morning hours, lewd conduct, or police detentions or arrests.

- M. That any provision of Ordinance 3639 or condition imposed by a County issued license, or any provision of any other local, State or Federal law, regulation, or order, or any condition imposed by licenses issued in compliance with those laws has not been violated.
- N. That the applicant has not violated any local or State law, statute, rule or regulation respecting the distribution, possession, or consumption of cannabis.
- O. That the applicant has not knowingly made a false statement of material fact or has knowingly omitted to state a material fact in the application for a license.
- P. That the applicant, his or her agent or employees, or any person who is exercising managerial authority on behalf of the applicant has not been convicted of a felony, or of a misdemeanor involving moral turpitude, or has engaged in misconduct related to the qualifications, functions or duties of a licensee. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere.
- Q. (S) That the applicant has not engaged in unlawful, fraudulent, unfair, or deceptive business acts or practices.

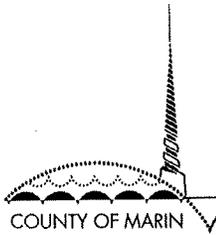
The County Administrator may also give additional merit to those applications that include an exceptional public benefits plan.

Appeals

An applicant who wishes to appeal the County Administrator's decision to issue, deny, or renew a license may appeal such decision to the Board of Supervisors by filing a written notice stating all grounds on which the appeal is based and paying applicable appeal fee with the Clerk of the Board of Supervisors within 10 business days of the County Administrator's written notice of decision. If an appeal is not taken within such time, the County Administrator's decision shall be final.

The Board of Supervisors shall consider the appeal within 90 days of the date of filing the appeal. The Clerk of the board shall give 10 days' notice to the person filing the appeal of the time and place of the meeting scheduled on the appeal by serving notice personally or by U.S. mail. The Board will also notify all parties that received notice prior to the MCDAC meeting for the specific Application, and to all subscribers to the County's Medical Cannabis Dispensary website (<http://www.marincounty.org/main/medical-cannabis-dispensary-ordinance>). The Board of Supervisors shall have the authority to determine all questions raised on such appeal.

For more information about Marin County's Medical Cannabis Dispensary Program, please visit: <http://www.marincounty.org/main/medical-cannabis-dispensary-ordinance>.



COMMUNITY DEVELOPMENT AGENCY
PLANNING DIVISION

MARIN COUNTY MEDICAL CANNABIS DISPENSARY LICENSE APPLICATION

TO BE COMPLETED BY PLANNING DEPARTMENT STAFF:

Date Received: _____

Receipt No: _____

Received By: _____ Review Fee Due: _____

*(Make checks payable to: Marin County Planning Department)
Note: Fees may not be refunded in full if the application is withdrawn.*

TO BE COMPLETED BY APPLICANT: (Please type or print legibly)

1. Dispensary Name: _____

2. Dispensary Applicant (Principal): _____

3. Dispensary Address: _____ City/Zip: _____

4. Assessor's Parcel No(s): _____ Zoning: _____

5. Applicant's Phone: _____

6. Applicant's Address: _____ City/Zip: _____

7. Applicant's Email: _____

8. Property Owner: _____ Phone: _____

9. Owner's Address: _____ City/Zip: _____

10. Owner's Email: _____

11. Please indicate any other individuals/parties to receive correspondence:

Name: _____ Address: _____

12. Dispensary Organization Status (include additional sheets if needed):

Please include proof of status, such as articles of incorporation, by-laws, partnership agreements, and other documentation as may be appropriate.

13. Dispensary Description (include additional sheets if needed):

Statement of Purpose of Dispensary

14. Description of neighborhood around the Proposed Location, nearby uses, transit access to site, etc. (include additional sheets if needed):

15. Name and address of school closest to Proposed Location:

"School" means an institution of learning for minors, whether public or private, offering a regular course of instruction required by the California Education Code. This definition includes an elementary school, middle or junior high school, senior high school, or any special institution of education, but it does not include a vocational or professional institution of higher education, including the College of Marin and any other college or university.

16. Name and address of youth oriented facility closest to Proposed Location:

"Youth-oriented facility" means a public park with play lots, playgrounds, athletic fields, and other amenities that are intended for use by minors or where the individuals who regularly use the facility are predominantly minors.

17. Name and address of smoke shop closest to Proposed Location:

"Smoke shop" means any tobacco retailer engaged in the sale and/or distribution of tobacco products or paraphernalia to the general public, excluding wholesale businesses, that either devotes 20% or more of floor area or display area to, or derives 75% or more of gross sales receipts from, the sale or exchange of tobacco products and/or tobacco paraphernalia.

18. Name and address of existing medical cannabis dispensary closest to Proposed Location:

SUBMITTAL CHECKLIST (include additional sheets if needed)

(Please refer to Marin County Medical Cannabis Dispensary Program Guide for detailed information about submittal requirements.)

A. Applicant Information

Location(s) of Information

- Applicant Additional Information
- Previous Addresses for Applicant (previous 3 years)
- Age Verification
- Physical Description
- Photographs
- Employment History (previous 3 years)
- Tax History
- Management Information
- Criminal Background
- Employee Information

B. Project Narrative and Business Plan

- Application Summary
- Compliance with Ordinance 3639
- Conformance with State and County laws
- Construction schedule
- Financial Capability

C. Operating Plan

- Operating Plan

D. Site and Improvement Plans

- Site Plan
- Neighborhood Context Map
- Floor Plan
- Lighting Plan

E. Security Plan

- Security Plan
- Security Policies
- Security Assessment

F. Public Benefits Plan

- Local Ownership
- Living Wage
- Card Check Neutral Policy
- Community Relations
- Educational Awareness Program
- Green Business
- Reduced Pricing Plan
- Labeling Plan

APPLICANT/PRINCIPAL SIGNATURE:

I hereby authorize employees, agents, and/or consultants of the County of Marin to seek verification of the information contained in this application and to enter upon the subject property, as necessary, to inspect the premises and process this application. I understand that the information provided in this application (except the Security Plan) is public information and that the information may be circulated for public inspection and/or posted online. I hereby authorize the Planning Department to reproduce plans and exhibits as necessary for the processing of this application.

I hereby certify under penalty of perjury that I have read this application form and that to the best of my knowledge, the information in this application form and all the exhibits are complete and accurate. I understand that any misstatement or omission of the requested information or of any information subsequently requested shall be grounds for rejecting the application, deeming the application incomplete, denying the application, suspending or revoking a license issued on the basis of these or subsequent representations, or for the seeking of such other and further relief as may seem proper to the County of Marin. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this application was signed at

_____, California on _____.

Signature of Applicant

Signature of Plan Preparer (if different)

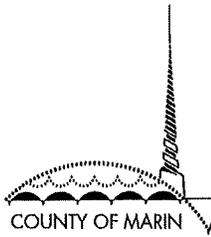
PROPERTY OWNER SIGNATURE:

I hereby certify under penalty of perjury that _____ has my consent to submit a Medical Cannabis Dispensary License application at the above-referenced subject property, and that this application was signed at

_____, California on _____.

Signature of Property Owner

EXHIBIT C



OFFICE OF THE
COUNTY ADMINISTRATOR

Matthew H. Hymel
COUNTY ADMINISTRATOR

NOTICE OF DECISION
Medical Cannabis Dispensary License Application

Daniel Eilerman
ASSISTANT COUNTY
ADMINISTRATOR

April 10, 2017

Angela Nicholson
ASSISTANT COUNTY
ADMINISTRATOR

Dustin Pebbles
7090 Hearst Dr.
El Dorado Hills CA 95762

Marin County Civic Center
3501 Civic Center Drive
Suite 325
San Rafael, CA 94903
415 473 6358 T
415 473 4104 F
CRS Dial 711
www.marincounty.org/cao

RE: Urban Hills Medical Cannabis Dispensary License Application
Application ID: 16-0040
230 Shoreline Highway, Mill Valley
Assessor's Parcel: 052-052-05

Dear Mr. Pebbles,

Thank you for submitting your application for a license to operate a medical cannabis dispensary at the above location pursuant to the County's medical cannabis dispensary ordinance (Ordinance 3639). Your application is one of ten proposals that were received by the County. After a careful and exhaustive review process, including consideration of comments from County staff, an advisory committee, and the public, I have reached a conclusion that none of the license applications will be approved. Consequently, I regret to inform you that your application has not been approved.

None of the proposed cannabis dispensary licenses met and exceeded all of the review criteria in Marin County Code Section 6.85.061 with the right combination of experienced applicant/operator, a location that adequately accommodates the use without neighborhood impacts, an operating plan that fits with the type and scale of the proposed dispensary use, and the requirements of Marin County Code Section 6.85.042. While I was the final decision-maker, if you are interested in learning about the comments I received, please contact Inge Lundegaard.

The advisory committee provided me with valuable information about the results of the public input process. I carefully investigated specific neighborhood concerns that were being raised in the public process. For example, I looked at the extent that any proposal might increase cannabis access to minors, specific traffic concerns, etc. Then, looking at all of the information before me, I made my

URBAN HILLS 00057

own assessment of all the review criteria listed in Marin County Code. I found public comments were particularly helpful in investigating whether the dispensary would "adversely affect the health, peace or safety of persons living or working in the surrounding area, overly burden a specific neighborhood with special needs or high impact uses, or contribute to a public nuisance . . ." under Marin County Code 6.85.061(L).

This decision illustrates the challenge in finding the right combination of operator and location to provide patients with safe access to medical cannabis locally. In light of this, I will be recommending the Board consider modifications to the medical cannabis dispensary ordinance that may include decoupling the selection of the operator from the location, reconsidering Marin's absolute non-profit requirement and instead allowing State law to govern that subject, and/or establishing standards for delivery-only dispensaries. This effort could also be informed by proposed regulations for medical cannabis businesses that the State's Bureau of Cannabis Regulation is anticipated to release later this year. I would encourage you to follow the progress of these efforts at www.marincounty.org/cannabis and to consider reapplying for a license in the future.

RIGHT TO APPEAL:

Pursuant to Marin County Code Section 6.85.063, you may appeal the decision to deny your license application by submitting a letter outlining the grounds on which the appeal is based along with an appeal fee of \$1,200 payable to the Community Development Agency within 10 business days from the date of this decision (by 4/24/2017). Please be advised that if an appeal is filed, your appeal will be heard by the Board of Supervisors on Tuesday, May 9, 2017 at or after 1:30 p.m.

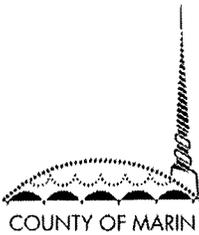
Sincerely,



Matthew Hymel
County Administrator

Cc: Board of Supervisors
George Kim (2601 Telegraph Ave., Oakland CA 94612)
Crystal Pebbles (7090 Hearst Dr., El Dorado Hills CA 95762)
Nicole Neubert (201 Spear St. Ste. 1100, San Francisco CA 94105)

Attachment: Medical Cannabis Advisory Committee Dispensary Applications Evaluation



Medical Cannabis Advisory Committee Medical Cannabis Dispensary Applications Evaluation

Executive Summary

A total of ten Medical Cannabis Dispensary applications were accepted for processing, four in Southern Marin, four in Northern Marin and two in Central/West Marin. Each application underwent a technical analysis by a Medical Cannabis Working Group, composed of representatives from eight County Departments that included Health and Human Services, Community Development Agency, Agricultural Weights & Measures, Public Works, Sheriff, County Counsel, Finance, and Administrator's Office. The Working Group analyzed each application for compliance with the standards required in the Medical Cannabis Dispensary Ordinance (No. 3639) and submittal requirements outlined in the Dispensary Application Guide. Application deficiencies were identified in addition to elements that exceeded standards.

The Working Group's analysis was provided to the Medical Cannabis Dispensary Advisory Committee (MCDAC), to assist with its review of each application and evaluation of the merits. The MCDAC also conducted three public meetings to provide an opportunity for the applicants to present their proposals to the Advisory Committee and community, and for the Committee to receive public input. In addition, comments in support and opposition were received from residents and community groups/agencies in the form of emails, letters, paper petitions, and Change.org petitions. MCDAC has compiled their evaluation findings and make the following advisory comments to the County Administrator.

All four applications in Southern Marin are located within the Tamalpais Valley community, along Shoreline Highway. All four applications had both strengths and areas of concerns. The Shoreline Health Center application was the strongest of the Tam Valley options and exceeded the ordinance standards in several areas of their application, including the Business, Operating, and Public Benefits Plan. However, there are concerns regarding the site's feasibility.

Northern Marin had four applications, three in the Black Point community and one in the Santa Venetia community. All four applications also had strengths and areas of concern. The Marin Community Partners Application was the strongest of the Northern Marin options and exceeded the ordinance standards in several areas of their application, including the Business and Operations Plan, and the Site and Improvements Plan. However, there was strong Community opposition to locating a Dispensary in the Black Point/Green Point communities. The application in Santa Venetia, Delta 11, had deficiencies in the Operating and Public Benefits Plan. However, this application had less community opposition.

Central/Western Marin had two applications, one in the San Geronimo Valley community and one in the East Shore Marshall community. Each application had unique strengths, but both had deficiencies in their Operating Plans, and the Site and Improvement Plans. In addition, the San Geronimo Valley application, Forest Knolls Wellness, had the largest community opposition response. There are also significant concerns regarding site feasibility of the Marshall application, Craftcanna Health Center.

Public Response

Public Response Summary

The table below summarizes the community’s response in both support and opposition to the proposed dispensaries, followed by details listed by community. Results were tabulated from written materials delivered to CDA via mail, email, petitions, and through online means such as Change.org. This data reflects one metric used to determine community sentiment. The results were screened to include only those who reside in Marin County given the focus of the County’s medical cannabis program to expand access to medical cannabis for residents of Marin County.

Dispensary	Location	Response
Southern Marin – Tamalpais Valley		
Access Marin Wellness Center	150 Shoreline Hwy., Mill Valley	Total: 851 responses (5% supported and 95% opposed)
Shoreline Health Center	200 Shoreline Hwy., Mill Valley	
Urban Hills	230 Shoreline Hwy., Mill Valley	
Crown Wellness	236 Shoreline Hwy., Mill Valley	
Northern Marin – Santa Venetia Community		
Delta 11	70 San Pablo, San Rafael	Total: 31 responses (19% supported and 81% opposed)
Northern Marin – Black Point and Green Point Communities		
Marin Compassionate Caregivers	5 Harbor Drive, Novato	Total: 511 responses (9% supported and 91% opposed)
Caregiver Compassion Group Relief Center	5 Harbor Drive, Novato	
Marin Community Partners	9 & 11 Harbor Drive, Novato	
Central Marin – San Geronimo Valley Community		
Forest Knolls Wellness	6700 Sir Francis Drake, Forest Knolls	Total: 1280 responses (13% supported and 87% opposed)
West Marin – East Shore Community		
Craftcanna Health Center	20105 State Route 1, Marshall	Total: 11 responses (100% opposed)

Marin County - general

- Received 13 letters in support for access to safe and quality Medical Cannabis in Marin.
- Received 3 letters in opposition to any Cannabis Dispensary in Marin.

Southern Marin – Tamalpais Valley Community

- Received 25 letters in support of a Dispensary in Tam Valley. Also, 14 of the 24 speakers at the Community Meeting were in support.
 - Reasons for support included the need for local access to quality Medical Cannabis in a safe Pharmacy environment.
- Received 2 letters from community groups in opposition, which included Sustainable Tamalonte and the Mill Valley School District. Received 149 letters, and 647 Change.org petition signatures from Marin residents (30 not from Marin) in opposition to the four applications. Also, 10 of the 24 speakers at the Community Meeting were in opposition.
 - Concerns included proximity of Dispensaries to youth serving businesses, and Safe Routes to schools. Also, there were concerns with increasing Cannabis access to youths, plus traffic and home value impacts.
- Received 2 letters in support and 3 letters in opposition to the Access Marin application. Plus, 58 endorsements and 2 in opposition for the Access Marin applicant.
- Received 2 letters in support for the Shoreline Health Center application. Plus, 20 endorsements and 1 in opposition for the Shoreline Health Center applicants.
- Received 9 endorsements for the Urban Hills applicants.

Northern Marin – Santa Venetia Community

- Received 3 letters in support of a Dispensary in Santa Venetia. Also, 3 of the 8 speakers at the Community Meeting were in support.
 - Reasons for support included the need for local access to Medical Cannabis.
- Received a letter from the Santa Venetia Neighborhood Association which stated that they do not endorse the application, but have discussed the potential to accept donations from Delta 11 should they be awarded a license. Received 20 letters in opposition to the application. Also, 5 of the 8 speakers at the Community Meeting were in opposition.
 - Concerns included proximity of Dispensary to business visited by local youth, and Safe Routes to school. Also, there were concerns with traffic impacts, quantity of parking, and proximity to residences.
- Received 5 letters from former Delta 11 employees, including general managers, with concerns regarding applicant's business practices.

Northern Marin – Black Point and Green Point Communities

- Received 3 letters in support of a Dispensary in the Black Point/Green Point area. Of the 50+ speakers at the public meeting, approximately 5 were in support. In addition, the owner of 5 Harbor Drive submitted a petition with 40 signatures in support of a Dispensary at that location.
 - Reasons for support included the need for local access to Medical Cannabis.
- Received 85 letters, and 333 paper petitions in opposition to the three applications. Also, approximately 45 of the 50+ speakers at the Community Meeting were in opposition to any Dispensary in the Black Point/Green Point Community.
 - Concerns included increased traffic, and its impact to the rural community, which has no public transit options. In addition, there were concerns of increased crime and slow emergency response times.

- Received 1 endorsement for the Caregiver Compassion Group Relief Center applicant.
- Received 3 endorsements for the Marin Compassionate Caregivers applicant.
- Received 13 letters in support for the Marin Community Partners application. Plus 6 endorsements for Marin Community Partners applicants and one letter in opposition.

Central Marin – San Geronimo Valley Community

- Received 6 letters in general support of a Dispensary in Central/West Marin. Approximately, 10 of the 80 speakers at the Community Meeting were in support of a Dispensary. In addition, the applicant initiated a Change.org petition and it received 156 signatures in support from Marin residents (472 received that were not from Marin).
 - Reasons for support included the need for local access to quality Medical Cannabis.
- Received 8 letters from community groups in opposition, including San Geronimo Valley Planning Group, San Geronimo Community Center, Marin County Office of Education, Lagunitas School District and the West Marin coalition for Healthy Kids. Received a petition with 21 signatures from the residents of the Forest Knolls Trailer Court, which is adjacent to the proposed dispensary. Received 252 emails, 413 paper petitions, 423 Change.org petition signatures from Marin residents (33 not from Marin), and approximately 70 speakers in opposition.
 - Concerns include impacts to youth whose path to school is in front of site, increased traffic, and displacement of existing Farm Stand business. In addition, there were concerns of increased crime and slow emergency response times. Also, multiple community members who attended the applicants “meet & greet” and meet Matt Shotwell, are concerned with his involvement with the Dispensary. The Applicant confirmed that he is a consultant and interested in purchasing the property, which is for sale.

West Marin – East Shore Community

- Received a letter from East Shore Planning Group in opposition. Received 8 letters from community members and 2 speakers in opposition.
 - Concerns included the use of a temporary structure, lack of adequate septic, water and parking. In addition, they were concerned with remoteness of the site and the viability of serving patients.
- Received 6 endorsements for the Craftcanna applicants, and one letter in opposition.

Application Evaluation Summary

The table below summarizes how each application met the Ordinance’s review criteria and operating requirements.

Dispensary	Location	Link to Page	Applicant (Experience, Background, etc.)	Plans (Business, Operating, etc.)	Site (neighborhood compatibility, etc.)
Southern Marin					
Access Marin Wellness Center	150 Shoreline Hwy., Mill Valley	link	No	No	No
Shoreline Health Center	200 Shoreline Hwy., Mill Valley	link	Yes	Yes	No
Urban Hills	230 Shoreline Hwy., Mill Valley	link	No	No	No
Crown Wellness	236 Shoreline Hwy., Mill Valley	link	No	No	No
Northern Marin					
Delta 11	70 San Pablo, San Rafael	link	No	No	Yes
Marin Compassionate Caregivers	5 Harbor Drive, Novato	link	No	No	No
Caregiver Compassion Group Relief Center	5 Harbor Drive, Novato	link	No	No	No
Marin Community Partners	9 & 11 Harbor Drive, Novato	link	Yes	Yes	No
Central & West Marin					
Forest Knolls Wellness	6700 Sir Francis Drake, Forest Knolls	link	No	No	No
Craftcanna Health Center	20105 State Route 1, Marshall	link	No	No	No

Access Marin Wellness - 150 Shoreline Hwy., Mill Valley

STRENGTHS

- Both applicants residing in Marin, and Robert Elam is a Tam Valley local who has been very involved in the community.
- Closed on weekends and before 11 a.m. M-F to reduce traffic impacts.
- New construction with proposed affordable housing above.
- Rigorous product testing plan.
- Robust employee benefits package and compensation.
- Comprehensive educational awareness program.
- Good access and response times for emergency services.

CONCERNS

- Development would require a Master Plan amendment, because existing Planning approval will expire May 10th 2017. A new development proposal would most likely require an EIR, and policies have changed significantly since last approval. Applicant estimated one year for entitlement process including construction, but our estimation is 3-4 years for completion.
- Site is within Flood Zone AE
- Concerns with financial solvency
- Staff training plan and security plan is insufficient.
- Applicants have minimal medical cannabis business experience.
 - Applicant, Robert Elam, has no experience in this area but it appears his law partner has some experience regarding cannabis law.
 - Elam partnered with Scott Perkins who runs a medical cannabis delivery service based in San Francisco, which started operating in 2015.

GENERAL COMMENTS

- This proposal is mostly an expansion of an existing delivery service based in San Francisco.
- Little experience running a small business and very little experience running a dispensary.
- Motivation from main owner Elam appears to be focused on community impacts vs. a passion for providing the best medicinal products to patients for their ailments.
- The public presentation focused on why they were better than the others, unlike any of the other 10 applicants, made a couple comments regarding crime and the safety of children in their presentation to support his application

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan			✓
Public Benefits Plan		✓	

Shoreline Health Center – 200 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicant, John Siotos, is well known and respected small business owner of the Dipsea Restaurant for over 30 years.
- Applicant, Salwa Ibrahim, is the founder of Blum Oak Dispensary in Oakland. Applicant, Alexis Parle, is a founder of Green Remedy Collective Dispensary in Richmond and Telegraph Health Center in Oakland. Both bring extensive experience running dispensaries, and are active in industry organizations.
- Dipsea Restaurant currently serves 300 – 1,000 people a day. Dispensary operation is expected to reduce visits and be a net positive impact on traffic. In addition, they are proposing to open at 10 am, to reduce traffic impact during peak commute. Also, delivery is proposed to operate between 10 a.m. and 3 p.m., during non-peak traffic times.
- Comprehensive Operating Plan, including specifics on site management, patient tracking, and robust testing plan
- Extensive Public Benefits Plan, including designated community relations manager with 24 on-call staff. Also, includes diverse plan for community grants and educational awareness.
- Applicants held four community “meet & greets”, two in August prior to applying, one in October and one in January prior to the Public Meeting conducted by the Medical Cannabis Dispensary Advisory Committee.
- Good access and response times for emergency services.

CONCERNS

- Organized as a non-profit but registered with State as a general stock corporation. Bylaws indicate potential intention of converting to for-profit operation whenever permitted by State law, which begs longer term concern regarding non-profit requirement in Marin’s Ordinance.
- Site is within Flood Zone AE
- The application proposes 52 parking spaces (51 existing and 28 required); however 33 are located on land leased from Marin County Flood Control. The current lease does not expire until 2025, but the lease limits the site to restaurant use. An amendment to the lease would be required for a dispensary, and it’s unknown whether the Flood Control District Board would support an amendment.

GENERAL COMMENTS

- Application is clear, organized, well written and professional with focus to create a “Pharmacy” atmosphere.
- Passion from all three applicants comes through “...just how passionate we are about helping people find relief for their illnesses and chronic-often painful-conditions through safe and affordable medical cannabis.”
- Application includes references from Oakland’s Mayor and City Administrator.
- Diverse Advisory Board, including Marin members and a nurse.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan	✓		
Operating Plan	✓		
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan	✓		

Urban Hills – 230 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicants and General Manager have experience running dispensaries.
- Applicants have small business experience.
- Proposing to open at 10 am, to reduce traffic impact during peak commute. Includes a delivery service.
- Included all administrative policies and procedures in application as well as employee handbook.
- Good access and response times for emergency services.

CONCERNS

- Site is within Flood Zone AE.
- Of the 20 proposed parking spaces, 8 are proposed to back out onto Shoreline Hwy.
- Business Plan was deficient and did not include employee benefits, vacation or medical.
- Public Benefits Plan’s outreach and community involvement was very limited. Did not meet living wage standards.

GENERAL COMMENTS

- Applicants are not Marin residents.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan			✓
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan			✓

Crown Wellness – 256 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicant, John Fritzal who is from Colorado, has extensive industry experience with over 100 projects nationwide.
- Good access and response times for emergency services.
- Detailed plan for providing reduced pricing.

CONCERNS

- Financial documents limited and could not determine solvency.
- Use would require a Master Plan Amendment, as the use of the building is limited to Furniture sales under the existing Master Plan.
- Parking standards could not be determined because proposal did not provide details of all businesses sharing one parking lot, including the size of the dispensary building.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.

GENERAL COMMENTS

- During the presentation, it seemed evident that the two Bay Area partners were not knowledgeable regarding Dispensary operations.
- This is a large out of state company.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan		✓	

Delta 11 – 70 San Pablo Ave., San Rafael

STRENGTHS

- Applicant, Alessandro Boggio is from Marin, and has been operating a Medical Cannabis delivery business in Marin for several years. Approximately 300 form letters of support from current members of delivery business were submitted with the application.
- Proposed facility would require minimal renovation and remodeling.
- Good access and response times for emergency services.

CONCERNS

- Organized as a non-profit but the actual Articles of Incorporation were not provided.
- Financial documents limited and could not determine solvency.
- An enforcement case was opened 4/25/16, because the Applicant was operating a Medical Cannabis Dispensary at 7 Mt Lassen Dr., San Rafael. The case was reopened on 10/5/16 because of a subsequent complaint. The site visit confirmed there was cannabis product onsite, which was removed and a follow-up visit on 11/14/16 confirmed the product had been removed. The Applicant maintained office space through November of 2016, then completely vacated.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections are very limited, and the living wage section stated they would meet state compliance, but no specifics.

GENERAL COMMENTS

- All proceeds above “reasonable business expenses” will go to neighborhood community group to determine which nonprofits get the proceeds.
- As proposed, the dispensary would require a minimum of 15 parking spaces, but only 12 spaces are proposed on site. An additional 8 spaces are proposed to be located on an adjoining property, however no evidence was provided to substantiate claim that the dispensary has legal access to 8 parking spaces on the adjoining lot.
- Operating hours proposed are, 9:00 a.m. to 9:00 p.m. 7 days a week, which is the maximum allowed by the Ordinance.
- The site is bordered on two sides by residences.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan			✓

Marin Compassionate Caregivers – 5 Harbor Dr., Novato

STRENGTHS

- Applicant, Susie Krolicki, is a Naturopathic Doctor and a Marin resident.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure.

CONCERNS

- Applicant has no dispensary management experience.
- Concerns with financial solvency.
- Site is within Flood Zone AE.
- Parking standards not met.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections are very limited.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Based on presentation, applicants are dedicated to healing. This is being set up as a doctor’s office as opposed to a pharmacy/dispensary. The Director would be the one checking eligibility and making recommendations.
- A lot of heart to the applicant but no depth or experience.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan			✓
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan			✓
Public Benefits Plan			✓

Caregiver Compassion Group Releaf Center – 5 Harbor Dr., Novato

STRENGTHS

- Applicants have opened and operated three dispensaries in Marin and Sonoma. Presently Sonoma facility operating as a delivery service. The Marin facility has been closed down.
- Applicant, Douglas Seiler, is a longtime resident in the Black Point neighborhood.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure
- Rigorous testing plan
- They are partnering with a San Rafael testing company to do all testing and quality control.

CONCERNS

- Concerns with financial solvency.
- Site is within Flood Zone AE.
- Parking standards not met.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections were very limited.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Presentation was disorganized.
- They did not have an adequate staffing plan; one was not included in application.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan			✓

Marin Community Partners - 11 Harbor Dr., Novato

STRENGTHS

- Applicant Timothy Schick is an executive from Berkeley Patients Group and brings extensive experience running dispensaries.
- Applicant, William Higgins, is a Marin resident and local business owner.
- Comprehensive Operating Plan, including specifics on site management, patient tracking, and rigorous testing plan
- Robust Security Plan, including staffing levels and surveillance cameras.
- Parking exceeds requirements
- Public Benefits Plan includes a Director of Communications and “good neighbor” policies.

CONCERNS

- Patient limit controls not outlined in detail
- Good access for emergency services, however response times are a concern given the location of the proposed site.

GENERAL COMMENTS

- Excellent presentation, “Leveraging Berkeley Patients Group 17 years of experience...”
- This application feels like a pharmacy and is staffed like one.
- Berkeley City Council declared October 31st to be Berkeley Patients Group day, recognizing its 10 years of contributions to the community.
- Dispensary is structured with two subsidiary LLC’s. Concerns with accountability if things go wrong?

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan	✓		
Operating Plan	✓		
Site and Improvement Plans	✓		
Security Plan		✓	
Public Benefits Plan		✓	

Forrest Knolls Wellness – 6700 Sir Francis Drake Blvd., Forrest Knolls

STRENGTHS

- Applicant, Kip Baldwin, is a Marin resident.
- Public Benefits Plan includes designated community relations manager and educational awareness program. Also, identifies local community groups they would collaborate with and support.

CONCERNS

- Applicant, Kip Baldwin, has no dispensary or small business experience.
- Operating Plan was deficient and did not include details on patient limit controls, staff training and site management. Also, plan includes expansion to recreational distribution when legally allowed.
- Parking does not meet standards, and 7 spaces appear to encroach onto Caltrans right of way.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Easily accessible for West Marin residents.
- Concern regarding potential involvement of a reality television personality with notoriety in the cannabis industry.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan		✓	

Craftcanna Health Center – 20105 Highway One, Marshall

STRENGTHS

- Applicant, Jyoti Sroa, is well known and respected small business owner/operator of the Sroa family owned Lotus Indian Restaurants.
- Applicant, Aaron Godbout, has experience operating dispensaries in Colorado.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure, and limits to Medical only.
- Public Benefits Plan includes reduced pricing plan, and client education plan.
- Renovation of historic site and provide affordable housing.

CONCERNS

- The estimated construction schedule of 4 months for the temporary structure is underestimated and does not account for planning and building entitlements. Our estimation is 2-3 years to complete the entitlement process.
- Operating Plan does not include sufficient details on patient limit controls, and patient and employee record keeping.
- Parking does not meet standards, and proposed spaces appear to encroach onto Caltrans right of way.
- Emergency response times would be unpredictable, but most likely not be good as the facility lies in a very remote area of Marin.

GENERAL COMMENTS

- Existing businesses have a history of community contributions and assisting the underserved.
- Liked small business experience of Applicants but location and site complications are major issues.
- Delivery service focused, approximately 85% of business.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan		✓	
Site and Improvement Plans			✓
Security Plan			✓
Public Benefits Plan		✓	

EXHIBIT D

(see color Site Plans
at Application: Site Plans, p. 1-4)

EXHIBIT E

Dear Ms. Lundegaard, Mr. Lai, and members of the Marin County Medical Cannabis Dispensary Advisory Board: Mr. Dresow, Mr. Frank, Chief Kreins, and Dr. Shearn:

Thank you very much for your time in considering our application and those of the other applicants. I write to clarify the provisions of Urban Hills, Inc.'s Employee Handbook submitted with our application materials and our policies with regard to employee benefits.

As I mentioned during the hearing, the reference in the handbook identified by the Board during our public hearing was intended to be applicable to part-time employees only. It has always been our intention to provide benefits, including vacation time, to our full-time staff. In fact, at the time our handbook was written we were researching unionization efforts for full-time workers.

To that end, we are currently engaged in discussions with the United Food and Commercial Workers' International Union ("UFCW") and are working toward the negotiation of Memorandum of Understanding ("MOU") under which Urban Hills, Inc. would become a union shop.

Thank you kindly for the opportunity to provide this clarification and an update on the current status of our efforts to provide benefits and a living wage to Urban Hills' employees.

Sincerely,

Dustin Pebbles
CEO
Urban Hills, Inc.



Nicole Howell Neubert <nhn@clarkneubert.com>

Urban Hills Letter about benefits

2 messages

Dustin Pebbles <dustin.urth@gmail.com>
To: Inge Lundegaard <ILundegaard@marincounty.org>
Cc: Nicole Howell Neubert <nhn@clarkneubert.com>

Tue, Feb 7, 2017 at 12:50 PM

Hello Inge,
Attached is a letter addressing a question asked by the committee at our hearing last week. It is for you and Tom as well. Would you please forward on to the committee for us. Thank you so much for all your efforts.

Best Wishes,

Dustin Pebbles
Urth Enterprises L.L.C / CEO Founder
OG Tea Company COO Co-Fouder
dustin.urth@gmail.com
cell: 707-364-7595

This electronic mail message contains information that (a) is or may be LEGALLY PRIVILEGED, CONFIDENTIAL, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) is intended only for the use of the Addressee(s) named herein. If you are not the intended recipient, addressee, or the person responsible for delivering this to an addressee, you are hereby notified that reading, using, copying, or distributing anypart of this message is strictly prohibited. If you have received this electronic mail message in error, please contact us immediately and take the steps necessary to delete the message completely from your computer system.

 **2016.02.02.Letter re Benefits and Union.docx**
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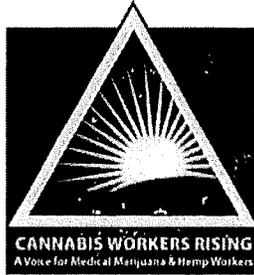
Lundegaard, Inge <ILundegaard@marincounty.org>
To: Dustin Pebbles <dustin.urth@gmail.com>
Cc: Nicole Howell Neubert <nhn@clarkneubert.com>

Mon, Feb 13, 2017 at 6:10 PM

Received, and I will forward.

Inge Lundegaard
Planner

EXHIBIT F



Neutrality and Card Check Agreement

Urban Hills Inc. ("the Employer") and the United Food and Commercial Workers Union Local 648 ("the Union") hereby agree to the following terms:

1. Neutrality and Non-Disparagement. The Employer agrees to remain neutral. Neutrality means that the Employer and its agents will not oppose union representation or hinder union organizing efforts. The Union waives the right to strike or picket the Employer during the agreement. Additionally, neither party will act or communicate in a negative, derogatory, or demeaning way, or engage in any coercive conduct or delaying tactics that might interfere with the employees' right to choose union representation.
2. Access. In accordance with applicable law and regulations, accredited Union representatives will be allowed onto the Employer's premises during working hours to speak with employees during non-working time. The Employer will cooperate with the Union in making arrangements to permit these conversations to be held in areas where the employees will be able to speak to the Union representatives without monitoring by the Employer.
3. Meeting. At the Union's request, the Employer will conduct a meeting on a mutually agreeable date(s) and time(s) with all of its employees. At the meeting, the Employer will tell the employees that it is neutral, does not object to their talking to and supporting the Union, and will negotiate a collective bargaining agreement (CBA) with the Union if a majority of the covered employees designate the Union as their collective bargaining representative. Union representatives will attend the meeting and, after the Employer has introduced them and left the meeting, talk with the employees about the Union.
4. Appropriate Bargaining Unit. All current employees employed by the Employer who are eligible to join the unit under applicable law.
5. Contact information. At the Union's request, the Employer shall furnish to the Union the names, job classifications, home addresses, home telephone numbers and home email addresses, if known, of all the Employer's current full-time and regular part-time employees, consistent with applicable law and regulations.
6. Recognition and Bargaining. When a mutually agreed upon third party confirms that a majority of the bargaining unit has authorized the Union to represent them for the purpose of collective bargaining, the Employer will recognize the Union as the exclusive representative of its employees, provided that the Union may assign jurisdiction and representation rights to any of its affiliates. The Employer and the Union will comply with all requirements necessary to obtain certification of the Union as the exclusive bargaining representative of the employees. Within 20 days from the date of recognition, the parties will begin good faith bargaining for a CBA covering the employees.
7. Arbitration. The parties agree that final and binding arbitration will be the exclusive remedy for any alleged violations of this Agreement and any dispute or claim arising from or relating to the interpretation or

application of any provision of this Agreement. Unless they promptly agree on an arbitrator, the parties will proceed to expedited arbitration using the American Arbitration Association's rules and procedures. The arbitrator is authorized to compel the attendance of witnesses and the production of documents at the arbitration hearing, and to award appropriate monetary, injunctive and declaratory relief. The parties agree not to challenge the arbitrator's decision in court.

8. Successorship, affiliated companies and subcontractors. This agreement will be binding on the parties' successors and assigns, including all purchasers of the Employer's assets or business, and in the event of a merger. This agreement is also binding on any and all marijuana industry corporations, partnerships, organizations and sole proprietorships affiliated with or related to the Employer's business activities. If the Employer intends to subcontract any work performed by bargaining unit employees, the Employer agrees to require the subcontractor, in writing, to comply with this agreement.
9. Governing Law and Severability. The parties agree that their rights under this Agreement shall be exercised in accordance with the applicable state laws. Further, the parties agree that this Agreement and any CBA they may enter into will remain binding and valid regardless of whether the National Labor Relations Board asserts jurisdiction over the Employer's operations. In addition, the parties agree that if any provision of this Agreement is held illegal, void or invalid under any applicable law, it may be changed to make it legal, valid and binding, and that the remaining provisions of this Agreement will remain binding and enforceable according to their terms and the parties' intent.
10. Term of Agreement. This Agreement is effective upon signing, and shall continue for three years from the first date the Employer receives written notice from the Union that it is invoking this Agreement's process, or the date on which the Employer recognizes the Union as the collective bargaining representative of its employees, whichever occurs sooner. The Employer shall notify the Union in writing when it has hired its first three employees. This Agreement may be extended by mutual agreement of the parties.

Dustin Pebbles CEO Urban Hills
For the Employer (print name) INC.

Daniel Larson
For the UFCW Local 648 (print name)

[Signature]
Signature

[Signature]
Signature

4-1-17
Date

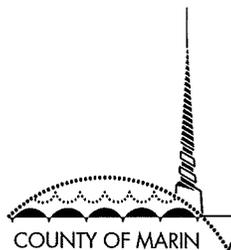
4-6-17
Date

Urban Hills Inc.
Employer/Company name

415-861-7840
Phone

230 Shoreline Hwy.
Address Mill Valley, Ca

707-364-7595
Phone



Matthew H. Hymel
COUNTY ADMINISTRATOR

NOTICE OF DECISION
Medical Cannabis Dispensary License Application

Daniel Eilerman
ASSISTANT COUNTY
ADMINISTRATOR

April 10, 2017

Angela Nicholson
ASSISTANT COUNTY
ADMINISTRATOR

Dustin Pebbles
7090 Hearst Dr.
El Dorado Hills CA 95762

Marin County Civic Center
3501 Civic Center Drive
Suite 325
San Rafael, CA 94903
415 473 6358 T
415 473 4104 F
CRS Dial 711
www.marincounty.org/cao

RE: Urban Hills Medical Cannabis Dispensary License Application
Application ID: 16-0040
230 Shoreline Highway, Mill Valley
Assessor's Parcel: 052-052-05

Dear Mr. Pebbles,

Thank you for submitting your application for a license to operate a medical cannabis dispensary at the above location pursuant to the County's medical cannabis dispensary ordinance (Ordinance 3639). Your application is one of ten proposals that were received by the County. After a careful and exhaustive review process, including consideration of comments from County staff, an advisory committee, and the public, I have reached a conclusion that none of the license applications will be approved. Consequently, I regret to inform you that your application has not been approved.

None of the proposed cannabis dispensary licenses met and exceeded all of the review criteria in Marin County Code Section 6.85.061 with the right combination of experienced applicant/operator, a location that adequately accommodates the use without neighborhood impacts, an operating plan that fits with the type and scale of the proposed dispensary use, and the requirements of Marin County Code Section 6.85.042. While I was the final decision-maker, if you are interested in learning about the comments I received, please contact Inge Lundegaard.

The advisory committee provided me with valuable information about the results of the public input process. I carefully investigated specific neighborhood concerns that were being raised in the public process. For example, I looked at the extent that any proposal might increase cannabis access to minors, specific traffic concerns, etc. Then, looking at all of the information before me, I made my

own assessment of all the review criteria listed in Marin County Code. I found public comments were particularly helpful in investigating whether the dispensary would “adversely affect the health, peace or safety of persons living or working in the surrounding area, overly burden a specific neighborhood with special needs or high impact uses, or contribute to a public nuisance . . .” under Marin County Code 6.85.061(L).

This decision illustrates the challenge in finding the right combination of operator and location to provide patients with safe access to medical cannabis locally. In light of this, I will be recommending the Board consider modifications to the medical cannabis dispensary ordinance that may include decoupling the selection of the operator from the location, reconsidering Marin’s absolute non-profit requirement and instead allowing State law to govern that subject, and/or establishing standards for delivery-only dispensaries. This effort could also be informed by proposed regulations for medical cannabis businesses that the State’s Bureau of Cannabis Regulation is anticipated to release later this year. I would encourage you to follow the progress of these efforts at www.marincounty.org/cannabis and to consider reapplying for a license in the future.

RIGHT TO APPEAL:

Pursuant to Marin County Code Section 6.85.063, you may appeal the decision to deny your license application by submitting a letter outlining the grounds on which the appeal is based along with an appeal fee of \$1,200 payable to the Community Development Agency within 10 business days from the date of this decision (by 4/24/2017). Please be advised that if an appeal is filed, your appeal will be heard by the Board of Supervisors on Tuesday, May 9, 2017 at or after 1:30 p.m.

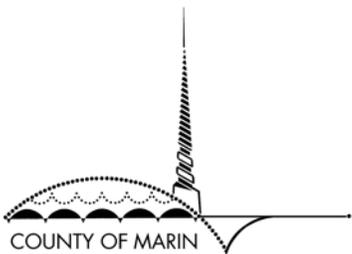
Sincerely,



Matthew Hymel
County Administrator

Cc: Board of Supervisors
George Kim (2601 Telegraph Ave., Oakland CA 94612)
Crystal Pebbles (7090 Hearst Dr., El Dorado Hills CA 95762)
Nicole Neubert (201 Spear St. Ste. 1100, San Francisco CA 94105)

Attachment: Medical Cannabis Advisory Committee Dispensary Applications Evaluation



Medical Cannabis Advisory Committee Medical Cannabis Dispensary Applications Evaluation

Executive Summary

A total of ten Medical Cannabis Dispensary applications were accepted for processing, four in Southern Marin, four in Northern Marin and two in Central/West Marin. Each application underwent a technical analysis by a Medical Cannabis Working Group, composed of representatives from eight County Departments that included Health and Human Services, Community Development Agency, Agricultural Weights & Measures, Public Works, Sheriff, County Counsel, Finance, and Administrator's Office. The Working Group analyzed each application for compliance with the standards required in the Medical Cannabis Dispensary Ordinance (No. 3639) and submittal requirements outlined in the Dispensary Application Guide. Application deficiencies were identified in addition to elements that exceeded standards.

The Working Group's analysis was provided to the Medical Cannabis Dispensary Advisory Committee (MCDAC), to assist with its review of each application and evaluation of the merits. The MCDAC also conducted three public meetings to provide an opportunity for the applicants to present their proposals to the Advisory Committee and community, and for the Committee to receive public input. In addition, comments in support and opposition were received from residents and community groups/agencies in the form of emails, letters, paper petitions, and Change.org petitions. MCDAC has compiled their evaluation findings and make the following advisory comments to the County Administrator.

All four applications in Southern Marin are located within the Tamalpais Valley community, along Shoreline Highway. All four applications had both strengths and areas of concerns. The Shoreline Health Center application was the strongest of the Tam Valley options and exceeded the ordinance standards in several areas of their application, including the Business, Operating, and Public Benefits Plan. However, there are concerns regarding the site's feasibility.

Northern Marin had four applications, three in the Black Point community and one in the Santa Venetia community. All four applications also had strengths and areas of concern. The Marin Community Partners Application was the strongest of the Northern Marin options and exceeded the ordinance standards in several areas of their application, including the Business and Operations Plan, and the Site and Improvements Plan. However, there was strong Community opposition to locating a Dispensary in the Black Point/Green Point communities. The application in Santa Venetia, Delta 11, had deficiencies in the Operating and Public Benefits Plan. However, this application had less community opposition.

Central/Western Marin had two applications, one in the San Geronimo Valley community and one in the East Shore Marshall community. Each application had unique strengths, but both had deficiencies in their Operating Plans, and the Site and Improvement Plans. In addition, the San Geronimo Valley application, Forest Knolls Wellness, had the largest community opposition response. There are also significant concerns regarding site feasibility of the Marshall application, Craftcanna Health Center.

Public Response

Public Response Summary

The table below summarizes the community’s response in both support and opposition to the proposed dispensaries, followed by details listed by community. Results were tabulated from written materials delivered to CDA via mail, email, petitions, and through online means such as Change.org. This data reflects one metric used to determine community sentiment. The results were screened to include only those who reside in Marin County given the focus of the County’s medical cannabis program to expand access to medical cannabis for residents of Marin County.

Dispensary	Location	Response
Southern Marin – Tamalpais Valley		
Access Marin Wellness Center	150 Shoreline Hwy., Mill Valley	Total: 851 responses (5% supported and 95% opposed)
Shoreline Health Center	200 Shoreline Hwy., Mill Valley	
Urban Hills	230 Shoreline Hwy., Mill Valley	
Crown Wellness	236 Shoreline Hwy., Mill Valley	
Northern Marin – Santa Venetia Community		
Delta 11	70 San Pablo, San Rafael	Total: 31 responses (19% supported and 81% opposed)
Northern Marin – Black Point and Green Point Communities		
Marin Compassionate Caregivers	5 Harbor Drive, Novato	Total: 511 responses (9% supported and 91% opposed)
Caregiver Compassion Group Relief Center	5 Harbor Drive, Novato	
Marin Community Partners	9 & 11 Harbor Drive, Novato	
Central Marin – San Geronimo Valley Community		
Forest Knolls Wellness	6700 Sir Francis Drake, Forest Knolls	Total: 1280 responses (13% supported and 87% opposed)
West Marin – East Shore Community		
Craftcanna Health Center	20105 State Route 1, Marshall	Total: 11 responses (100% opposed)

Marin County - general

- Received 13 letters in support for access to safe and quality Medical Cannabis in Marin.
- Received 3 letters in opposition to any Cannabis Dispensary in Marin.

Southern Marin – Tamalpais Valley Community

- Received 25 letters in support of a Dispensary in Tam Valley. Also, 14 of the 24 speakers at the Community Meeting were in support.
 - Reasons for support included the need for local access to quality Medical Cannabis in a safe Pharmacy environment.
- Received 2 letters from community groups in opposition, which included Sustainable Tamalmonite and the Mill Valley School District. Received 149 letters, and 647 Change.org petition signatures from Marin residents (30 not from Marin) in opposition to the four applications. Also, 10 of the 24 speakers at the Community Meeting were in opposition.
 - Concerns included proximity of Dispensaries to youth serving businesses, and Safe Routes to schools. Also, there were concerns with increasing Cannabis access to youths, plus traffic and home value impacts.
- Received 2 letters in support and 3 letters in opposition to the Access Marin application. Plus, 58 endorsements and 2 in opposition for the Access Marin applicant.
- Received 2 letters in support for the Shoreline Health Center application. Plus, 20 endorsements and 1 in opposition for the Shoreline Health Center applicants.
- Received 9 endorsements for the Urban Hills applicants.

Northern Marin – Santa Venetia Community

- Received 3 letters in support of a Dispensary in Santa Venetia. Also, 3 of the 8 speakers at the Community Meeting were in support.
 - Reasons for support included the need for local access to Medical Cannabis.
- Received a letter from the Santa Venetia Neighborhood Association which stated that they do not endorse the application, but have discussed the potential to accept donations from Delta 11 should they be awarded a license. Received 20 letters in opposition to the application. Also, 5 of the 8 speakers at the Community Meeting were in opposition.
 - Concerns included proximity of Dispensary to business visited by local youth, and Safe Routes to school. Also, there were concerns with traffic impacts, quantity of parking, and proximity to residences.
- Received 5 letters from former Delta 11 employees, including general managers, with concerns regarding applicant’s business practices.

Northern Marin – Black Point and Green Point Communities

- Received 3 letters in support of a Dispensary in the Black Point/Green Point area. Of the 50+ speakers at the public meeting, approximately 5 were in support. In addition, the owner of 5 Harbor Drive submitted a petition with 40 signatures in support of a Dispensary at that location.
 - Reasons for support included the need for local access to Medical Cannabis.
- Received 85 letters, and 333 paper petitions in opposition to the three applications. Also, approximately 45 of the 50+ speakers at the Community Meeting were in opposition to any Dispensary in the Black Point/Green Point Community.
 - Concerns included increased traffic, and its impact to the rural community, which has no public transit options. In addition, there were concerns of increased crime and slow emergency response times.

- Received 1 endorsement for the Caregiver Compassion Group Relief Center applicant.
- Received 3 endorsements for the Marin Compassionate Caregivers applicant.
- Received 13 letters in support for the Marin Community Partners application. Plus 6 endorsements for Marin Community Partners applicants and one letter in opposition.

Central Marin – San Geronimo Valley Community

- Received 6 letters in general support of a Dispensary in Central/West Marin. Approximately, 10 of the 80 speakers at the Community Meeting were in support of a Dispensary. In addition, the applicant initiated a Change.org petition and it received 156 signatures in support from Marin residents (472 received that were not from Marin).
 - Reasons for support included the need for local access to quality Medical Cannabis.
- Received 8 letters from community groups in opposition, including San Geronimo Valley Planning Group, San Geronimo Community Center, Marin County Office of Education, Lagunitas School District and the West Marin coalition for Healthy Kids. Received a petition with 21 signatures from the residents of the Forest Knolls Trailer Court, which is adjacent to the proposed dispensary. Received 252 emails, 413 paper petitions, 423 Change.org petition signatures from Marin residents (33 not from Marin), and approximately 70 speakers in opposition.
 - Concerns include impacts to youth whose path to school is in front of site, increased traffic, and displacement of existing Farm Stand business. In addition, there were concerns of increased crime and slow emergency response times. Also, multiple community members who attended the applicants “meet & greet” and meet Matt Shotwell, are concerned with his involvement with the Dispensary. The Applicant confirmed that he is a consultant and interested in purchasing the property, which is for sale.

West Marin – East Shore Community

- Received a letter from East Shore Planning Group in opposition. Received 8 letters from community members and 2 speakers in opposition.
 - Concerns included the use of a temporary structure, lack of adequate septic, water and parking. In addition, they were concerned with remoteness of the site and the viability of serving patients.
- Received 6 endorsements for the Craftcanna applicants, and one letter in opposition.

Application Evaluation Summary

The table below summarizes how each application met the Ordinance’s review criteria and operating requirements.

Dispensary	Location	Link to Page	Applicant (Experience, Background, etc.)	Plans (Business, Operating, etc.)	Site (neighborhood compatibility, etc.)
Southern Marin					
Access Marin Wellness Center	150 Shoreline Hwy., Mill Valley	link	No	No	No
Shoreline Health Center	200 Shoreline Hwy., Mill Valley	link	Yes	Yes	No
Urban Hills	230 Shoreline Hwy., Mill Valley	link	No	No	No
Crown Wellness	236 Shoreline Hwy., Mill Valley	link	No	No	No
Northern Marin					
Delta 11	70 San Pablo, San Rafael	link	No	No	Yes
Marin Compassionate Caregivers	5 Harbor Drive, Novato	link	No	No	No
Caregiver Compassion Group Relief Center	5 Harbor Drive, Novato	link	No	No	No
Marin Community Partners	9 & 11 Harbor Drive, Novato	link	Yes	Yes	No
Central & West Marin					
Forest Knolls Wellness	6700 Sir Francis Drake, Forest Knolls	link	No	No	No
Craftcanna Health Center	20105 State Route 1, Marshall	link	No	No	No

Access Marin Wellness - 150 Shoreline Hwy., Mill Valley

STRENGTHS

- Both applicants residing in Marin, and Robert Elam is a Tam Valley local who has been very involved in the community.
- Closed on weekends and before 11 a.m. M-F to reduce traffic impacts.
- New construction with proposed affordable housing above.
- Rigorous product testing plan.
- Robust employee benefits package and compensation.
- Comprehensive educational awareness program.
- Good access and response times for emergency services.

CONCERNS

- Development would require a Master Plan amendment, because existing Planning approval will expire May 10th 2017. A new development proposal would most likely require an EIR, and policies have changed significantly since last approval. Applicant estimated one year for entitlement process including construction, but our estimation is 3-4 years for completion.
- Site is within Flood Zone AE
- Concerns with financial solvency
- Staff training plan and security plan is insufficient.
- Applicants have minimal medical cannabis business experience.
 - Applicant, Robert Elam, has no experience in this area but it appears his law partner has some experience regarding cannabis law.
 - Elam partnered with Scott Perkins who runs a medical cannabis delivery service based in San Francisco, which started operating in 2015.

GENERAL COMMENTS

- This proposal is mostly an expansion of an existing delivery service based in San Francisco.
- Little experience running a small business and very little experience running a dispensary.
- Motivation from main owner Elam appears to be focused on community impacts vs. a passion for providing the best medicinal products to patients for their ailments.
- The public presentation focused on why they were better than the others, unlike any of the other 10 applicants, made a couple comments regarding crime and the safety of children in their presentation to support his application

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan			✓
Public Benefits Plan		✓	

Shoreline Health Center – 200 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicant, John Siotos, is well known and respected small business owner of the Dipsea Restaurant for over 30 years.
- Applicant, Salwa Ibrahim, is the founder of Blum Oak Dispensary in Oakland. Applicant, Alexis Parle, is a founder of Green Remedy Collective Dispensary in Richmond and Telegraph Health Center in Oakland. Both bring extensive experience running dispensaries, and are active in industry organizations.
- Dipsea Restaurant currently serves 300 – 1,000 people a day. Dispensary operation is expected to reduce visits and be a net positive impact on traffic. In addition, they are proposing to open at 10 am, to reduce traffic impact during peak commute. Also, delivery is proposed to operate between 10 a.m. and 3 p.m., during non-peak traffic times.
- Comprehensive Operating Plan, including specifics on site management, patient tracking, and robust testing plan
- Extensive Public Benefits Plan, including designated community relations manager with 24 on-call staff. Also, includes diverse plan for community grants and educational awareness.
- Applicants held four community “meet & greets”, two in August prior to applying, one in October and one in January prior to the Public Meeting conducted by the Medical Cannabis Dispensary Advisory Committee.
- Good access and response times for emergency services.

CONCERNS

- Organized as a non-profit but registered with State as a general stock corporation. Bylaws indicate potential intention of converting to for-profit operation whenever permitted by State law, which begs longer term concern regarding non-profit requirement in Marin’s Ordinance.
- Site is within Flood Zone AE
- The application proposes 52 parking spaces (51 existing and 28 required); however 33 are located on land leased from Marin County Flood Control. The current lease does not expire until 2025, but the lease limits the site to restaurant use. An amendment to the lease would be required for a dispensary, and it’s unknown whether the Flood Control District Board would support an amendment.

GENERAL COMMENTS

- Application is clear, organized, well written and professional with focus to create a “Pharmacy” atmosphere.
- Passion from all three applicants comes through “...just how passionate we are about helping people find relief for their illnesses and chronic-often painful-conditions through safe and affordable medical cannabis.”
- Application includes references from Oakland’s Mayor and City Administrator.
- Diverse Advisory Board, including Marin members and a nurse.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan	✓		
Operating Plan	✓		
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan	✓		

Urban Hills – 230 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicants and General Manager have experience running dispensaries.
- Applicants have small business experience.
- Proposing to open at 10 am, to reduce traffic impact during peak commute. Includes a delivery service.
- Included all administrative policies and procedures in application as well as employee handbook.
- Good access and response times for emergency services.

CONCERNS

- Site is within Flood Zone AE.
- Of the 20 proposed parking spaces, 8 are proposed to back out onto Shoreline Hwy.
- Business Plan was deficient and did not include employee benefits, vacation or medical.
- Public Benefits Plan’s outreach and community involvement was very limited. Did not meet living wage standards.

GENERAL COMMENTS

- Applicants are not Marin residents.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan			✓
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan			✓

Crown Wellness – 256 Shoreline Hwy., Mill Valley

STRENGTHS

- Applicant, John Fritzal who is from Colorado, has extensive industry experience with over 100 projects nationwide.
- Good access and response times for emergency services.
- Detailed plan for providing reduced pricing.

CONCERNS

- Financial documents limited and could not determine solvency.
- Use would require a Master Plan Amendment, as the use of the building is limited to Furniture sales under the existing Master Plan.
- Parking standards could not be determined because proposal did not provide details of all businesses sharing one parking lot, including the size of the dispensary building.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.

GENERAL COMMENTS

- During the presentation, it seemed evident that the two Bay Area partners were not knowledgeable regarding Dispensary operations.
- This is a large out of state company.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan		✓	

Delta 11 – 70 San Pablo Ave., San Rafael

STRENGTHS

- Applicant, Alessandro Boggio is from Marin, and has been operating a Medical Cannabis delivery business in Marin for several years. Approximately 300 form letters of support from current members of delivery business were submitted with the application.
- Proposed facility would require minimal renovation and remodeling.
- Good access and response times for emergency services.

CONCERNS

- Organized as a non-profit but the actual Articles of Incorporation were not provided.
- Financial documents limited and could not determine solvency.
- An enforcement case was opened 4/25/16, because the Applicant was operating a Medical Cannabis Dispensary at 7 Mt Lassen Dr., San Rafael. The case was reopened on 10/5/16 because of a subsequent complaint. The site visit confirmed there was cannabis product onsite, which was removed and a follow-up visit on 11/14/16 confirmed the product had been removed. The Applicant maintained office space through November of 2016, then completely vacated.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections are very limited, and the living wage section stated they would meet state compliance, but no specifics.

GENERAL COMMENTS

- All proceeds above “reasonable business expenses” will go to neighborhood community group to determine which nonprofits get the proceeds.
- As proposed, the dispensary would require a minimum of 15 parking spaces, but only 12 spaces are proposed on site. An additional 8 spaces are proposed to be located on an adjoining property, however no evidence was provided to substantiate claim that the dispensary has legal access to 8 parking spaces on the adjoining lot.
- Operating hours proposed are, 9:00 a.m. to 9:00 p.m. 7 days a week, which is the maximum allowed by the Ordinance.
- The site is bordered on two sides by residences.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans		✓	
Security Plan		✓	
Public Benefits Plan			✓

Marin Compassionate Caregivers – 5 Harbor Dr., Novato

STRENGTHS

- Applicant, Susie Krolicki, is a Naturopathic Doctor and a Marin resident.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure.

CONCERNS

- Applicant has no dispensary management experience.
- Concerns with financial solvency.
- Site is within Flood Zone AE.
- Parking standards not met.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections are very limited.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Based on presentation, applicants are dedicated to healing. This is being set up as a doctor’s office as opposed to a pharmacy/dispensary. The Director would be the one checking eligibility and making recommendations.
- A lot of heart to the applicant but no depth or experience.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan			✓
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan			✓
Public Benefits Plan			✓

Caregiver Compassion Group Releaf Center – 5 Harbor Dr., Novato

STRENGTHS

- Applicants have opened and operated three dispensaries in Marin and Sonoma. Presently Sonoma facility operating as a delivery service. The Marin facility has been closed down.
- Applicant, Douglas Seiler, is a longtime resident in the Black Point neighborhood.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure
- Rigorous testing plan
- They are partnering with a San Rafael testing company to do all testing and quality control.

CONCERNS

- Concerns with financial solvency.
- Site is within Flood Zone AE.
- Parking standards not met.
- Operating Plan is deficient and did not include details on patient limits, supply, testing, signage, patient and employee record keeping, or general site management.
- Public Benefits Plan’s community relations and educational awareness sections were very limited.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Presentation was disorganized.
- They did not have an adequate staffing plan; one was not included in application.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan			✓

Marin Community Partners - 11 Harbor Dr., Novato

STRENGTHS

- Applicant Timothy Schick is an executive from Berkeley Patients Group and brings extensive experience running dispensaries.
- Applicant, William Higgins, is a Marin resident and local business owner.
- Comprehensive Operating Plan, including specifics on site management, patient tracking, and rigorous testing plan
- Robust Security Plan, including staffing levels and surveillance cameras.
- Parking exceeds requirements
- Public Benefits Plan includes a Director of Communications and “good neighbor” policies.

CONCERNS

- Patient limit controls not outlined in detail
- Good access for emergency services, however response times are a concern given the location of the proposed site.

GENERAL COMMENTS

- Excellent presentation, “Leveraging Berkeley Patients Group 17 years of experience...”
- This application feels like a pharmacy and is staffed like one.
- Berkeley City Council declared October 31st to be Berkeley Patients Group day, recognizing its 10 years of contributions to the community.
- Dispensary is structured with two subsidiary LLC’s. Concerns with accountability if things go wrong?

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan	✓		
Operating Plan	✓		
Site and Improvement Plans	✓		
Security Plan		✓	
Public Benefits Plan		✓	

Forrest Knolls Wellness – 6700 Sir Francis Drake Blvd., Forrest Knolls

STRENGTHS

- Applicant, Kip Baldwin, is a Marin resident.
- Public Benefits Plan includes designated community relations manager and educational awareness program. Also, identifies local community groups they would collaborate with and support.

CONCERNS

- Applicant, Kip Baldwin, has no dispensary or small business experience.
- Operating Plan was deficient and did not include details on patient limit controls, staff training and site management. Also, plan includes expansion to recreational distribution when legally allowed.
- Parking does not meet standards, and 7 spaces appear to encroach onto Caltrans right of way.
- Good access for emergency services, however response times are a concern.

GENERAL COMMENTS

- Easily accessible for West Marin residents.
- Concern regarding potential involvement of a reality television personality with notoriety in the cannabis industry.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan			✓
Site and Improvement Plans			✓
Security Plan		✓	
Public Benefits Plan		✓	

Craftcanna Health Center – 20105 Highway One, Marshall

STRENGTHS

- Applicant, Jyoti Sroa, is well known and respected small business owner/operator of the Sroa family owned Lotus Indian Restaurants.
- Applicant, Aaron Godbout, has experience operating dispensaries in Colorado.
- Articles of Incorporation do not include a conversion to a “For-Profit” structure, and limits to Medical only.
- Public Benefits Plan includes reduced pricing plan, and client education plan.
- Renovation of historic site and provide affordable housing.

CONCERNS

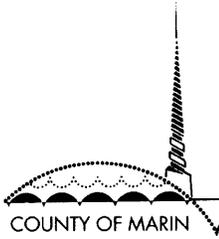
- The estimated construction schedule of 4 months for the temporary structure is underestimated and does not account for planning and building entitlements. Our estimation is 2-3 years to complete the entitlement process.
- Operating Plan does not include sufficient details on patient limit controls, and patient and employee record keeping.
- Parking does not meet standards, and proposed spaces appear to encroach onto Caltrans right of way.
- Emergency response times would be unpredictable, but most likely not be good as the facility lies in a very remote area of Marin.

GENERAL COMMENTS

- Existing businesses have a history of community contributions and assisting the underserved.
- Liked small business experience of Applicants but location and site complications are major issues.
- Delivery service focused, approximately 85% of business.

ORDINANCE STANDARDS TECHNICAL REVIEW SUMMARY

	EXCEEDS	SUFFICIENT	DEFICIENT
Business Plan		✓	
Operating Plan		✓	
Site and Improvement Plans			✓
Security Plan			✓
Public Benefits Plan		✓	



COMMUNITY DEVELOPMENT AGENCY
PLANNING DIVISION

MARIN COUNTY MEDICAL CANNABIS DISPENSARY LICENSE APPLICATION

TO BE COMPLETED BY PLANNING DEPARTMENT STAFF:

Date Received: _____

Receipt No: _____

Received By: _____ Review Fee Due: _____

*(Make checks payable to: Marin County Planning Department)
Note: Fees may not be refunded in full if the application is withdrawn.*

TO BE COMPLETED BY APPLICANT: (Please type or print legibly)

1. Dispensary Name: Urban Hills Inc.
2. Dispensary Applicant (Principal): Dustin Pebbles
3. Dispensary Address: 230 Shoreline Hwy City/Zip: Mill Valley 94941
4. Assessor's Parcel No(s): 052-052-05 Zoning: GC/CP
5. Applicant's Phone: 707-364-7595
6. Applicant's Address: 7090 Hearst Drive City/Zip: El Dorado Hills 95762
7. Applicant's Email: dustin.urth@gmail.com
8. Property Owner: George Kim Phone: 415-209-4066
9. Owner's Address: 2601 Telegraph Ave. City/Zip: Oakland 94612
10. Owner's Email: glkim06@yahoo.com
11. Please indicate any other individuals/parties to receive correspondence:
Name: Crystal Pebbles Address: crystal.urth@gmail.com
Nicole Neubert nhn@clarkneubert.com
12. Dispensary Organization Status (include additional sheets if needed):

Urban Hills Inc. Non Profit Mutual Benefit Corporation-Active See Attached Documents.

Please include proof of status, such as articles of incorporation, by-laws, partnership agreements, and other documentation as may be appropriate.

13. Dispensary Description (include additional sheets if needed):

Statement of Purpose of Dispensary

To provide medical grade cannabis products to the patients in need of medical
cannabis in Marin County. Our Primary Focus is safe access with clean quality medications for our patients.

14. Description of neighborhood around the Proposed Location, nearby uses, transit access to site, etc. (include additional sheets if needed):

Urban Hills locations sits just off the highway on Shoreline Hwy across from Walgreens shopping center. It is surrounded by many local small businesses that accent the culture of Marin, including a cegetarian restaurant, urban clothing and a coffee shop. Public bus routes pass through the area.

15. Name and address of school closest to Proposed Location:

Tamalpais Valley School: 350 Bell Lane, Mill Valley, Ca 94941

"School" means an institution of learning for minors, whether public or private, offering a regular course of instruction required by the California Education Code. This definition includes an elementary school, middle or junior high school, senior high school, or any special institution of education, but it does not include a vocational or professional institution of higher education, including the College of Marin and any other college or university.

16. Name and address of youth oriented facility closest to Proposed Location:

Kay Park: 398 Linda Way, Mill Valley, Ca 94941

"Youth-oriented facility" means a public park with play lots, playgrounds, athletic fields, and other amenities that are intended for use by minors or where the individuals who regularly use the facility are predominantly minors.

17. Name and address of smoke shop closest to Proposed Location:

"Smoke shop" means any tobacco retailer engaged in the sale and/or distribution of tobacco products or paraphernalia to the general public, excluding wholesale businesses, that either devotes 20% or more of floor area or display area to, or derives 75% or more of gross sales receipts from, the sale or exchange of tobacco products and/or tobacco paraphernalia.

Teleford's Pipe and Cigar: 664 Redwood Hwy. Frontage Rd, Mill Valley, 94941

18. Name and address of existing medical cannabis dispensary closest to Proposed Location:

The Apothecarium: 2095 Markey Street, San Francisco, 94114

SUBMITTAL CHECKLIST (include additional sheets if needed)

(Please refer to Marin County Medical Cannabis Dispensary Program Guide for detailed information about submittal requirements.)

A. Applicant Information

Location(s) of Information

- Applicant Additional Information
- Previous Addresses for Applicant (previous 3 years)
- Age Verification
- Physical Description
- Photographs
- Employment History (previous 3 years)
- Tax History
- Management Information
- Criminal Background
- Employee Information

B. Project Narrative and Business Plan

- Application Summary
- Compliance with Ordinance 3639
- Conformance with State and County laws
- Construction schedule
- Financial Capability

C. Operating Plan

- Operating Plan

D. Site and Improvement Plans

- Site Plan
- Neighborhood Context Map
- Floor Plan
- Lighting Plan

E. Security Plan

- Security Plan
- Security Policies
- Security Assessment

F. Public Benefits Plan

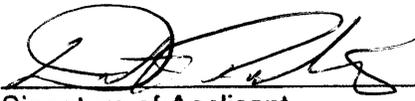
- Local Ownership
- Living Wage
- Card Check Neutral Policy
- Community Relations
- Educational Awareness Program
- Green Business
- Reduced Pricing Plan
- Labeling Plan

APPLICANT/PRINCIPAL SIGNATURE:

I hereby authorize employees, agents, and/or consultants of the County of Marin to seek verification of the information contained in this application and to enter upon the subject property, as necessary, to inspect the premises and process this application. I understand that the information provided in this application (except the Security Plan) is public information and that the information may be circulated for public inspection and/or posted online. I hereby authorize the Planning Department to reproduce plans and exhibits as necessary for the processing of this application.

I hereby certify under penalty of perjury that I have read this application form and that to the best of my knowledge, the information in this application form and all the exhibits are complete and accurate. I understand that any misstatement or omission of the requested information or of any information subsequently requested shall be grounds for rejecting the application, deeming the application incomplete, denying the application, suspending or revoking a license issued on the basis of these or subsequent representations, or for the seeking of such other and further relief as may seem proper to the County of Marin. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this application was signed at

Urban Hills Inc, Robert Park, California on 8-19-2016



Signature of Applicant

Signature of Plan Preparer (if different)

PROPERTY OWNER SIGNATURE:

I hereby certify under penalty of perjury that George Kim has my consent to submit a Medical Cannabis Dispensary License application at the above-referenced subject property, and that this application was signed at

Oakland, California on August 18, 2016



Signature of Property Owner

APPLICANT INFORMATION

Name of Applicant: Dustin Pebbles

Current Address: 7090 Hearst Drive
El Dorado Hills, CA 95762

Telephone: 707.364.7595 (Cell)

Qualifying Patient: YES Doctor: Helene Malabed DO
Address: 3400 Elvas Ave.
Sacramento, CA
916.436.1929
California License: 20A6778
Patient ID: 168495-182501
Verification:551026104763

Mailing Address: Dustin Pebbles
7090 Hearst Drive
El Dorado Hills, CA 95762

Previous Address: 637 Ely Blvd S
Petaluma, CA 94954

Age Verification: Passport attached

Physical: Dustin Pebbles is 5'10" tall and weighs about 180lbs. He has blonde shaved hair and blue eyes.

Photograph: Attached

Employment History: OWNER
Green Universe Hydro Store
Sonoma, CA
Calistoga, CA.

PARTNER/OWNER
The OG Tea Company
www.ogtea.com

PARTNER/OWNER
Urth Enterprises LLC

PARTNER/OWNER
Bohemian Brothers Brands

Tax History: Tax documents have been included.

Management: Dustin Pebbles
7090 Hearst Drive
El Dorado Hills, CA
95762

Management: Crystal Pebbles
7090 Hearst Drive
El Dorado Hills, CA
95762

Management: Dave McCullick
davem.magnolia@gmail.com

Criminal Background: Livescan to be provided

Employment: 15 total employees

Total Health Compassion

Malabed Medical

3400 Elvas Ave. Sacramento, CA 95819

Ph: 916.436.1929 Fax: 877.496.6150

Physician's Statement

California Health and Safety Code Section: 11362.5

Date of Issue:

01/15/2016

Recommendation valid for: 12 months

The purpose of this medical document certifies that: **Dustin Pebbles** was examined and evaluated in my office and his medical condition may benefit from the use of medical cannabis as medicine (CBD), pursuant to **California Health and safety code section 11362.5**, also known as **The Compassionate Act of 1996, prop 215**.

Therefore if the patient chooses to use cannabis as therapeutic medicine, I will continue to monitor his condition and provide advice on his progress. Also, I have informed my patient not to use medical cannabis with alcohol or other mind altering medications. He is also informed not to drive, operate heavy machinery or engage in any activity that requires alertness and concentration while using medical cannabis. By signing below, the patient also states that the medical information given to me is true and that if proven otherwise it can be considered perjury in the court of law.

Due to the nature of **Dustin Pebbles**, her medical condition and illness, she may grow up to 99 plants and possess up to 19 lbs of dried cannabis flowers to get sufficient enough supply to produce for oral consumption format of condensed cannabis which needs a large amount of coarse cannabis preparation.

Physician Signature:

Helene Malabed DO

California License: 20A6778

Patient Signature:

Date of expiration: 01/15/2017

Verify Online: marijuanadoctors.com/verify

Verify by Phone: (855) 420-9420

Patient Number: 168495-182501

Verification Code: 551026104763

PARTNER/OWNER
Bohemian Brothers Brands

Tax History: Tax documents have been included.

Management: Dustin Pebbles
7090 Hearst Drive
El Dorado Hills, CA
95762

Management: Crystal Pebbles
7090 Hearst Drive
El Dorado Hills, CA
95762

Management: Dave McCullick
davem.magnolia@gmail.com

Criminal Background: Livescan to be provided

Employment: 15 total employees

Total Health Compassion

Malabed Medical

3400 Elvas Ave. Sacramento, CA 95819

Ph: 916.436.1929 Fax: 877.496.6150

Physician's Statement



California Health and Safety Code Section: 11362.5

Date of Issue:

Recommendation valid for: 12 months

The purpose of this medical document certifies that: was examined and evaluated in my office and his medical condition may benefit from the use of medical cannabis as medicine (CBD), pursuant to **California Health and safety code section 11362.5**, also known as **The Compassionate Act of 1996, prop 215**.

Therefore if the patient chooses to use cannabis as therapeutic medicine, I will continue to monitor his condition and provide advice on his progress. Also, I have informed my patient not to use medical cannabis with alcohol or other mind altering medications. He is also informed not to drive, operate heavy machinery or engage in any activity that requires alertness and concentration while using medical cannabis. By signing below, the patient also states that the medical information given to me is true and that if proven otherwise it can be considered perjury in the court of law.

Due to the nature of , **her medical condition and illness, she may grow up to 99 plants and possess up to 19 lbs of dried cannabis flowers to get sufficient enough supply to produce for oral consumption format of condensed cannabis which needs a large amount of coarse cannabis preparation.**

Physician Signature: 
Helene Malabed DO

California License: 20A6778

Patient Signature:
Date of expiration: 01/15/2017
Verify Online: marijuanadoctors.com/verify
Verify by Phone: (855) 420-9420
Patient Number: 168494-182500
Verification Code: 774041472375

FIRST AMENDED AND RESTATED BYLAWS
OF
URBAN HILLS, INC.,
A CALIFORNIA NONPROFIT MUTUAL BENEFIT CORPORATION

ARTICLE ONE - IDENTITY

1.1 *Corporate Name.* The name of this corporation is Urban Hills, Inc.

1.2 *Principal Office.* The principal office for the transaction of the activities and affairs of this corporation is located at 1300 Valley House Drive, Suite 100-26, Rohnert Park, CA 94941. The Board of Directors may change the location of the principal office.

1.3 *Purpose.* The general purpose of this corporation is to engage in any lawful act or activity other than credit union business for which a corporation may be organized under such law. In the context of these general purposes, the specific purpose is to form a Collective. As such this corporation shall operate in a non-profit manner within the State of California in order that the Collective's members may collectively or cooperatively cultivate, and facilitate transactions between members for the provision of, medical marijuana in compliance with Proposition 215, and as applicable, the Medical Marijuana Program Act ("MMPA"), the August 2008 Attorney General Guidelines For The Security And Non-Diversion Of Marijuana Grown For Medical Use, the Medical Marijuana Regulation and Safety Act ("MMRSA"), any and all relevant Business & Professions Code sections as may become applicable, and all other applicable laws, guidance, or memoranda related to the cultivation, processing, testing, transportation, and/or distribution of medical cannabis.

1.4 *Construction; Definitions.* Unless the context requires otherwise, the general provisions, rules of construction, and definitions in the California Nonprofit Corporation Law shall govern the construction of these bylaws. Without limiting the generality of the preceding sentence, the masculine gender includes the feminine and neuter, the singular includes the plural, the plural includes the singular, and the term "person" includes both a legal entity and a natural person.

ARTICLE TWO – MEMBERSHIP & MEETINGS

2.1 *Classes of Membership.* This corporation shall have two (2) classes of members: (1) Class One: Governing Members and (2) Class Two: Patient Members.

2.3 *Patient Member.* Any person dedicated to the purposes of the corporation and who satisfies the following requirements shall be eligible for beneficial membership in the Collective operated by the Corporation on approval of the membership application by the Board and on timely payment of such dues and fees as the Board may fix from time to time:

1. Is a Qualified Patient or Caregiver:

That is: (A) Is a Qualified Patient (as defined in California Health & Safety Code section 11362.7(f)); or (B) Is person with an Identification Card (as defined in California Health & Safety Code section 11362.7(c)), or (C) Is a Primary Caregiver (as defined in California Health & Safety Code section 11362.7(d)); AND

2. Has a valid driver's license or other form of state-issued identification; AND
3. Makes full payment of any nonrefundable membership and registration fee or fees that may be set by the Board, the price of which shall be determined from time to time by the Board in its sole discretion; AND
4. Volunteers one hour every month, or, provides a monetary contribution to funds earmarked solely for charitable purposes; AND
5. Completes, agrees to, and executes a Membership Application, including all Membership Terms and Conditions, and any and all additional paperwork as may be required by the Board. Patient member agrees that his or her physician may be contacted to verify the recommendation.

2.4 *Governing Member.* Governing members are those members that meet the qualification of patient members and are admitted as Governing Members. Governing members shall have the right to vote on and are responsible for corporate governance, management, operational, and financial matters. Each Governing Member shall be entitled to one (1) vote to be cast on any corporate matter, pursuant to Corporations Code sections 5056(a), 5010 and 7330.

Governing members shall be Dustin Pebbles and Crystal Pebbles. Governing Members may be admitted or removed by a majority vote of the Governing Members only.

2.5 Membership Rights. Governing members shall have the right to vote, as set forth in these bylaws, on any corporate matter pursuant to Corporations Code sections 5010 and 7330, on the amendment of these the articles of incorporation or bylaws, on the election of Directors, on the disposition of all or substantially all of the assets of the corporation, on any merger and its principal terms and any amendment of those terms, and on any election to dissolve the corporation, pursuant to Corporations Code section 5056(a). In addition, those members shall have all rights afforded members under the California Nonprofit Mutual Benefit Corporation Law. If the corporation is dissolved, the Governing members shall receive a pro rata distribution of all assets in the same ratio as his or her number of votes to the total number then eligible vote in the Governing Member class, exclusive of those held in charitable trust, remaining after payment or provision for payment of the obligations and debts of the corporation and provision for any other payment required under applicable law.

Patient members shall have the right to access all benefits of the Collective operated by the Corporation but shall not have those rights set forth in Corporations Code section 5056(a). Any other benefits of patient membership may be determined by the unanimous vote of the Board of Directors.

2.6 Medical Marijuana Regulation and Safety Act. It is specifically contemplated that the articles and bylaws will be amended to conform to the requirements of the Medical Marijuana Regulation and Safety Act (“MMRSA”) at whatever time and to whatever extent such provisions may be applicable to this Corporation, and to the fullest extent possible to conform this Corporation to the operating standards available under the MMRSA. Moreover, it is contemplated that, as available and pursuant to MMRSA, this Corporation may be merged or converted (if available) to a for-profit entity. As set forth in these Bylaws, but for the avoidance of doubt, only Governing Members only are entitled to vote on such matters.

2.7 Dues, Fees, and Assessments. Each member must pay, within the time and on the conditions set by the Board, the dues, fees, and assessments in amounts to be fixed from time to time by the Board. The dues, fees, and assessments shall be equal for all members of each class, but the Board may, in its discretion, set different dues, fees, and assessments for each class.

2.7 *Good Standing.* Members who meet all the requirements stated above and have paid the required dues, fees, and assessments in accordance with these bylaws and who are not suspended shall be members in good standing.

2.8 *Termination of Membership.* A membership shall terminate on occurrence of any of the following events:

- (1) Resignation of the member;
- (2) Death of the member;
- (3) Dissolution of the corporation;
- (4) Expiration of the period of membership, unless the membership is renewed on the renewal terms fixed by the Board;
- (5) The member's failure to pay dues, fees, or assessments as set by the Board within 30 days after they are due and payable;
- (6) Any event that renders the member ineligible for membership, or failure to satisfy membership qualifications; or
- (7) Termination of membership under these bylaws based on the good faith determination by the Board, or a committee or person authorized by the Board to make such a determination, that the member has failed in a material and serious degree to observe the rules of conduct of the corporation, or has engaged in conduct materially and seriously prejudicial to the corporation's purposes and interests; and
- (8) Within the sole discretion of the Board and without obtaining the consent of any Patient Members, Patient Memberships may be terminated in a merger or other conversion of the Corporation.

2.9 *Suspension of Membership.* A member may be suspended, under Section 2.7 of these bylaws, based on the good faith determination by the Board, or a committee or person authorized by the Board to make such a determination, that the member has failed in a material and serious degree to observe the corporation's rules of conduct, or has engaged in conduct materially and seriously prejudicial to the corporation's purposes and interests.

A person whose membership is suspended shall not be a member during the period of suspension.

2.10 Transfer of Memberships. A Patient Membership and any right that arises therefrom may not be transferred. A Governing Membership may be transferred pursuant to California Corporations Code section 7320 to a prospective member meeting the Governing Member qualifications set forth in these bylaws. The board may, by resolution, impose transfer fees or other conditions on either the transferring party or the transferee as it deems fit.

2.11 Annual Meeting. Unless the Board of Directors specifies otherwise in a Notice to Governing Members, the annual meeting for the purpose of electing Directors and for such other business as may be required, shall be held in June of each year at any place within or outside California designated by the Board or by the written consent of all Governing Members entitled to vote at the meeting, given before or after the meeting. In the absence of any such designation, the annual meeting shall be held at the corporation's principal office. All Governing Members are required to attend annual meetings, and may attend via electronic transmission pursuant to California Corporations Code section 7510(f).

2.12 Special Meetings. A special meeting of the Governing Members may be called by the Chairperson of the Board, any Governing Member, the President or Secretary, or any two Directors for any lawful purpose.

If called for by the Board, a special meeting of Patient Members may also be held at such time and place, and on such notice, if any, as the Board may determine.

2.13 Eligibility to Vote. Subject to the California Nonprofit Mutual Benefit Corporation Law and as set forth herein, Governing Members in good standing on the record date as determined under Sections 2.4 of these bylaws shall be entitled to vote at any meeting of members.

2.14 Majority Approval. If a quorum is present, the affirmative vote of a majority of the voting power represented at the meeting, entitled to vote and voting on any matter, shall be deemed the act of the Governing Members.

2.15 Action by Unanimous Written Consent. Any action required or permitted to be taken by the Governing Members may be taken without a meeting, if all Governing Members consent in writing to the action. The written consent or consents shall be filed with the minutes of the meeting. The action by written consent shall have the same force and effect as a unanimous vote of the Governing Members.

ARTICLE THREE - DIRECTORS

3.1 General Powers of Board. Subject to the provisions and limitations of the California Nonprofit Mutual Benefit Corporation Law and any other applicable laws, and subject to any limitations of the articles of incorporation or bylaws regarding actions that require approval of the members, the corporation's activities and affairs shall be managed, and all corporate powers shall be exercised, by or under the direction of the Board. The Board may delegate the management of the activities of the Corporation to any person or persons, management company or committee however composed, provided that the activities and affairs of the Corporation be managed and all corporate powers shall be exercised under the ultimate direction of the Board.

3.2 Specific Powers of Board. Without prejudice to the general powers set forth in Section 4.1 of these bylaws, but subject to the same limitations, the Board shall have the power to do the following:

(1) Appoint and remove, at the pleasure of the Board, all corporate officers, agents, and employees; prescribe powers and duties for them as are consistent with the law, the articles of incorporation, and these bylaws; fix their compensation; and require from them security for faithful service.

(2) Change the principal office or the principal business office in California from one location to another; cause the corporation to be qualified to conduct its activities in any other state, territory, dependency, or country; conduct its activities in or outside California; and designate a place in or outside California for holding any meeting of members.

(3) Borrow money and incur indebtedness on the corporation's behalf and cause to be executed and delivered for the corporation's purposes, in the corporate name, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, and other evidences of debt and securities.

(4) Adopt and use a corporate seal; prescribe the forms of membership certificates; and alter the forms of the seal and certificates.

3.3 Number and Qualifications of Directors. The authorized number of Directors shall be three (3). The qualifications for Directors are that each is a Member in good standing.

3.4 *Nominations*. When a meeting is held for the election of Directors, any Governing Member present at the meeting in person or by proxy may place names in nomination.

3.5 *Vacancies on Board*. A vacancy or vacancies on the Board of Directors shall occur in the event of (1) the death, removal, or resignation of any Director; (2) the declaration by Board resolution of a vacancy in the office of a Director who has been declared of unsound mind by a court order, convicted of a felony, or, if the corporation holds assets in charitable trust, found by a final order or judgment of any court to have breached a duty arising under Corporations Code §7238; (3) the vote of a majority of all Governing Members, to remove any Director(s); (4) an increase in the authorized number of Directors; (5) a failure of the members, at any meeting of Governing Members at which any Director or Directors are to be elected, to elect the number of Directors required to be elected at that meeting; or (6) the declaration by Board resolution of a vacancy of a seat that has not been filled.

3.6 *Resignation of Directors*. Except as provided below, any Director may resign by giving written notice to the chair of the Board, if any, or to the President or the Secretary of the Board. The resignation shall be effective when the notice is given unless it specifies a later time for the resignation to become effective. If a Director's resignation is effective at a later time, the Board may elect a successor to take office as of the date when the resignation becomes effective.

3.7 *Removal of Directors*. Any Director may be removed, with or without cause, by the vote of the majority of the Governing Members or a majority vote of the Board of Directors, at a special meeting called for that purpose, or at a regular meeting, provided that notice of that meeting and of the removal questions are given as provided herein. Any vacancy caused by the removal of a Director shall be filled as provided in Section 3.9.

3.8 *Vacancies Filled by Board*. Except for a vacancy created by the removal of a Director by the Governing Members, vacancies on the Board may be filled by approval of the Board or, if the number of Directors then in office is less than a quorum, by (1) the unanimous written consent of the Directors then in office, (2) the affirmative vote of a majority of the Directors then in office at a meeting held according to notice or waivers of notice complying with Corporations Code §7211, or (3) a sole remaining Director.

3.9 Vacancies Filled by Members. The Governing Members may elect a Director or Directors at any time to fill any vacancy or vacancies not filled by the Directors.

3.10 Location of Board Meetings. Meetings of the Board shall be held at any place within or outside California that has been designated by resolution of the Board or in the notice of the meeting or, if not so designated, at the principal office of the corporation.

3.11 Meetings by Telecommunication. Any Board meeting may be held by conference telephone, video screen communication, or other communications equipment. Participation in a meeting under this Section shall constitute presence in person at the meeting if both the following apply:

(1) Each member participating in the meeting can communicate concurrently with all other members.

(2) Each member is provided the means of participating in all matters before the Board, including the capacity to propose, or to interpose an objection to, a specific action to be taken by the corporation.

3.12 Annual Meeting of Board. Immediately after each annual meeting of Governing Members, the Board shall hold a general meeting for purposes of organization, election of officers, and transaction of other business. Notice of this meeting is not required.

Other general meetings of the Board may be held without notice at such time and place as the Board may fix from time to time.

3.13 Special Board Meetings. Special meetings of the Board for any lawful purpose may be called at any time by the chair of the Board, if any, the President or any vice President, the Secretary, or any two Directors.

3.154 Notice of Special Board Meetings. Notice of the time and place of special meetings shall be given to each Director by (1) personal delivery of written notice; (2) first-class mail, postage prepaid; (3) telephone, including a voice messaging system or other system or technology designed to record and communicate messages, or by electronic transmission, either directly to the Director or to a person at the Director's office who would reasonably be expected to communicate that notice promptly to the Director; (4) facsimile; (5) electronic mail; or (6) other electronic means. All such notices shall be given or

sent to the Director's address or telephone number as shown on the corporation's records.

Notices sent by first-class mail shall be deposited in the United States mails at least 4 days before the time set for the meeting. Notices given by personal delivery, telephone, or electronic transmission shall be delivered, telephoned, or sent, respectively, at least 48 hours before the time set for the meeting.

The notice shall state the time of the meeting and the place, if the place is other than the corporation's principal office. The notice need not specify the purpose of the meeting.

3.15 *Quorum*. A majority of the authorized number of Directors shall constitute a quorum for the transaction of any business except adjournment. Every action taken or decision made by a majority of the Directors present at a duly held meeting at which a quorum is present shall be an act of the Board, subject to the more stringent provisions of the California Nonprofit Mutual Benefit Corporation Law, including, without limitation, the provisions on (1) approval of contracts or transactions between this corporation and one or more Directors or between this corporation and any entity in which a Director has a material financial interest, (2) creation of and appointments to committees of the Board, and (3) indemnification of Directors. A meeting at which a quorum is initially present may continue to transact business, despite the withdrawal of some Directors, if any action taken or decision made is approved by at least a majority of the required quorum for that meeting.

3.16 *Waiver of Notice*. Notice of a meeting need not be given to any Director who, either before or after the meeting, signs a waiver of notice, a written consent to the holding of the meeting, or an approval of the minutes of the meeting. The waiver of notice or consent need not specify the purpose of the meeting. All waivers, consents, and approvals shall be filed with the corporate records or made a part of the minutes of the meetings. Notice of a meeting need not be given to any Director who attends the meeting and who, before or at the beginning of the meeting, does not protest the lack of notice to him or her.

3.17 *Board Action Without Meeting*. Any action that the Board is required or permitted to take may be taken without a meeting if all Board members consent in writing to the action. Such an action by written consent shall have the same

force and effect as any other validly approved Board action. All such consents shall be filed with the minutes of the proceedings of the Board.

3.18 *Director Compensation*. Directors and members of committees of the Board may receive such reimbursement of expenses as the Board may establish by resolution to be just and reasonable as to the corporation at the time that the resolution is adopted.

3.19 *Director Voting*. Each Director shall have one vote on each matter presented to the Board of Directors for action. No Director may vote by proxy.

3.20 *Board Committees*. The Board, by resolution adopted by a majority of the Directors then in office, may create one or more committees, each consisting of two or more Directors and no one who is not a Director, to serve at the pleasure of the Board. Appointments to committees of the Board shall be by majority vote of the Directors then in office. The Board may appoint one or more Directors as alternate members of any such committee, who may replace any absent member at any meeting. Any such committee shall have all the authority of the Board, to the extent provided in the Board resolution, except that no committee may do the following:

(1) Take any final action on any matter that, under the California Nonprofit Mutual Benefit Corporation Law, also requires approval of the members or approval of a majority of all members;

(2) Fill vacancies on the Board or any committee of the Board;

(3) Fix compensation of the Directors for serving on the Board or on any committee;

(4) Amend or repeal bylaws or adopt new bylaws;

(5) Amend or repeal any resolution of the Board that by its express terms is not so amendable or repealable;

(6) Create any other committees of the Board or appoint the members of committees of the Board; or

(7) Expend corporate funds to support a nominee for Director if more people have been nominated for Director than can be elected.

3.21 *Committee Meetings.* Meetings and actions of committees of the Board shall be governed by, held, and taken under the provisions of these bylaws concerning meetings and other Board actions, except that the time for general meetings of Board committees and the calling of special meetings of Board committees may be set either by Board resolution or, if none, by resolution of the committee. Minutes of each meeting shall be kept and shall be filed with the corporate records. The Board may adopt rules for the governance of any committee as long as the rules are consistent with these bylaws. If the Board has not adopted rules, the committee may do so.

ARTICLE FOUR - OFFICERS

4.1 *Officers.* The officers of this corporation shall be a President, a Secretary, and a Chief Financial Officer. The corporation, at the Board's discretion, may also have a chair of the Board, one or more vice Presidents, one or more assistant secretaries, one or more assistant treasurers, and such other officers as may be appointed under Section 4.3 of these bylaws.

Any number of offices may be held by the same person.

4.2 *Election of Officers.* The officers of this corporation, except any appointed under Section 4.3 of these bylaws, shall be chosen annually by the Board and shall serve at the pleasure of the Board, subject to the rights of any officer under any employment contract.

4.3 *Additional Officers.* The Board may appoint and authorize the chair of the Board, the President, or another officer to appoint any other officers that the corporation may require. Each appointed officer shall have the title and authority, hold office for the period, and perform the duties specified in the bylaws or established by the Board.

4.4 *Removal of Officers.* Without prejudice to the rights of any officer under an employment contract, the Board may remove any officer with or without cause. An officer who was not chosen by the Board may be removed by any other officer on whom the Board confers the power of removal.

4.5 *Resignation of Officers.* Any officer may resign at any time by giving written notice to the Board. The resignation shall take effect on the date the notice is received or at any later time specified in the notice. Unless otherwise specified in the notice, the resignation need not be accepted to be effective.

Any resignation shall be without prejudice to any rights of the corporation under any contract to which the officer is a party.

4.6 *Vacancies*. A vacancy in any office because of death, resignation, removal, disqualification, or any other cause shall be filled in the manner prescribed in these bylaws for normal appointments to that office. However, vacancies need not be filled on an annual basis.

4.7 *Responsibilities of Board Chair*. If a chair of the Board of Directors is elected, he or she shall preside at Board meetings and shall exercise and perform such other powers and duties as the Board may assign from time to time. If there is no President, the chair of the Board shall also be the chief executive officer and shall have the powers and duties of the President of the corporation set forth in these bylaws.

4.8 *Responsibilities of President*. Subject to such supervisory powers as the Board may give to the chair of the Board, if any, and subject to the control of the Board, the President shall be the general manager of the corporation and shall supervise, direct, and control the corporation's activities, affairs, and officers. The President shall preside at all members' meetings and, in the absence of the chair of the Board, or if none, at all Board meetings. The President shall have such other powers and duties as the Board or the bylaws may require.

4.9 *Responsibilities of Vice Presidents*. If the President is absent or disabled, the vice Presidents, if any, in order of their rank as fixed by the Board, or, if not ranked, a vice President designated by the Board, shall perform all duties of the President. When so acting, a vice President shall have all powers of and be subject to all restrictions on the President. The vice Presidents shall have such other powers and duties as the Board or the bylaws may require.

4.10 *Responsibilities of Secretary*. The Secretary shall keep or cause to be kept, at the corporation's principal office or such other place as the Board may direct, a book of minutes of all meetings, proceedings, and actions of the Board, of committees of the Board, and of members' meetings. The minutes of meetings shall include the time and place that the meeting was held; whether the meeting was annual, general, or special, and, if special, how authorized; the notice given; the names of persons present at Board and committee meetings; and the number of members present or represented at members' meetings.

The Secretary shall keep or cause to be kept, at the principal California office, a copy of the articles of incorporation and bylaws, as amended to date.

The Secretary shall keep or cause to be kept, at the corporation's principal office or at a place determined by resolution of the Board, a record of the corporation's members, showing each member's name, address, and class of membership.

The Secretary shall give, or cause to be given, notice of all meetings of members, of the Board, and of committees of the Board that these bylaws require to be given. The Secretary shall have such other powers and perform such other duties as the Board or the bylaws may require.

4.11 *Responsibilities of Chief Financial Officer.* The chief financial officer shall keep and maintain, or cause to be kept and maintained, adequate and correct books and accounts of the corporation's properties and transactions. The chief financial officer shall send or cause to be given to the members and Directors such financial statements and reports as are required to be given by law, by these bylaws, or by the Board. The books of account shall be open to inspection by any Director at all reasonable times.

The chief financial officer shall (1) deposit, or cause to be deposited, all money and other valuables in the name and to the credit of the corporation with such depositories as the Board may designate; (2) disburse the corporation's funds as the Board may order; (3) render to the President, chair of the Board, if any, and the Board, when requested, an account of all transactions as chief financial officer and of the financial condition of the corporation; and (4) have such other powers and perform such other duties as the Board or the bylaws may require.

ARTICLE FIVE - CONTRACTS WITH DIRECTORS, LOANS, INDEMNIFICATION, INSURANCE

5.1 *Contracts with Directors.* No Director of this corporation nor any other corporation, firm, association, or other entity in which one or more of this corporation's Directors are Directors or have a material financial interest, shall be interested, directly or indirectly, in any contract or other transaction with this corporation unless (1) the material facts as to the transaction and such Director's interest are fully disclosed or known to the Governing Members and such contract or transaction is approved by the Governing Members in good faith, with any membership owned by any interested Director not being entitled to vote thereon, or (2) the material facts regarding such Director's financial interest

in such contract or transaction or regarding such common Directorship, officership, or financial interest are fully disclosed in good faith and are noted in the minutes or are known to all Board members before consideration by the Board of such contract or transaction, and such contract or transaction is authorized in good faith by a majority of the Board by a vote sufficient for that purpose without counting the vote of the interested Director.

5.2 *Loans to Directors and Officers.* This corporation shall not lend any money or property to, or guarantee the obligation of, any Director or officer of the corporation unless (1) the Board decides that the loan or guaranty may reasonably be expected to benefit the corporation, and (2) before consummating the transaction or any part of it, the loan or guaranty is approved by either the members, without counting the vote of the Director or officer, if a member, or the vote of a majority of the Directors then in office, without counting the vote of the Director who is to receive the loan or guaranty.

5.3 *Indemnification.* To the fullest extent permitted by law, this corporation shall indemnify its Directors and officers, and may indemnify employees and other persons described in Corporations Code §7237(a), including persons formerly occupying any such positions, against all expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred by them in connection with any "proceeding," as that term is used in that section, and including an action by or in the right of the corporation, by reason of the fact that the person is or was a person described in that section. "Expenses," as used in this bylaw, shall have the same meaning as in that section of the Corporations Code.

On written request to the Board by any person seeking indemnification under Corporations Code §7237(b) §7237(c), the Board shall promptly decide under Corporations Code §7237(e) whether the applicable standard of conduct set forth in Corporations Code §7237(b) or §7237(c) has been met and, if so, the Board shall authorize indemnification. If the Board cannot authorize indemnification, because the number of Directors who are parties to the proceeding with respect to which indemnification is sought prevents the formation of a quorum of Directors who are not parties to that proceeding, the Board shall promptly call a meeting of members. At that meeting, the members shall determine under Corporations Code §7237(e) whether the applicable standard of conduct has been met and, if so, the members present at the meeting in person or by proxy shall authorize indemnification.

To the fullest extent permitted by law and except as otherwise determined by the Board in a specific instance, expenses incurred by a person seeking indemnification under this Section in defending any proceeding covered by those Sections shall be advanced by the corporation before final disposition of the proceeding, on receipt by the corporation of an undertaking by or on behalf of that person that the advance will be repaid unless it is ultimately found that the person is entitled to be indemnified by the corporation for those expenses.

5.4 Insurance. This corporation shall have the right, and shall use its best efforts, to purchase and maintain insurance to the full extent permitted by law on behalf of its officers, Directors, employees, and other agents, to cover any liability asserted against or incurred by any officer, Director, employee, or agent in such capacity or arising from the officer's, Director's, employee's, or agent's status as such.

ARTICLE SIX - CORPORATE RECORDS AND REPORTS

6.1 Corporate Records. This corporation shall keep the following:

- (1) Adequate and correct books and records of account;
- (2) Minutes of the proceedings of its members, Board, and committees of the Board;
- (3) The original or a copy the Articles of Incorporation and Bylaws as amended to date; and
- (4) A record of each member's name, address, and class of membership, and all required membership documents, including membership agreement and supporting documentation.

The minutes and other books and records shall be kept either in written form or in any other form capable of being converted into clearly legible tangible form or in any combination of the two.

6.2 Members' Inspection Rights. Unless the corporation provides a reasonable alternative as provided below, any member may do either or both of the following for a purpose reasonably related to the member's interest as a member:

- (1) Inspect and copy the records containing members' names, addresses, and voting rights during usual business hours on 5 days' prior written demand on the

corporation, which must state the purpose for which the inspection rights are requested; or

(2) Obtain from the Secretary of the corporation, on written demand and tender of a reasonable charge, a list of names, addresses, and voting rights of members who are entitled to vote for Directors as of the most recent record date for which that list has been compiled, or as of the date, after the date of demand, specified by the member. The demand shall state the purpose for which the list is requested. The Secretary shall make this list available to the member on or before the later of 10 days after the demand is received or the date specified in the demand as the date as of which the list is to be compiled.

The corporation may, within 10 business days after receiving a demand under this Section, make a written offer of an alternative method of reasonable and timely achievement of the proper purpose specified in the demand without providing access to or a copy of the membership list. Any rejection of this offer must be in writing and must state the reasons the proposed alternative does not meet the proper purpose of the demand.

If the corporation reasonably believes that the information will be used for a purpose other than one reasonably related to a person's interest as a member, or if it provides a reasonable alternative under this Section, it may deny the member access to the membership list.

Any inspection and copying under this Section may be made in person or by the member's agent or attorney. The right of inspection includes the right to copy and make extracts. This right of inspection extends to the records of any subsidiary of the corporation.

6.3 Inspection of Accounting Records and Minutes. On written demand on the corporation, any Governing or Patient Member may inspect, copy, and make extracts of the accounting books and records and the minutes of the proceedings of the members, the Board of Directors, and committees of the Board at any reasonable time for a purpose reasonably related to the member's interest as a member. Any such inspection and copying may be made in person or by the member's agent or attorney.

6.4 Inspection of Articles and Bylaws. This corporation shall keep at its principal California office the original or a copy of the articles of incorporation and bylaws, as amended to the current date, that shall be open to inspection by the Governing and Patient Members at all reasonable times during office hours.

If the corporation has no business office in California, the Secretary shall, on the written request of any member, furnish to that member a copy of the articles of incorporation and bylaws, as amended to the current date.

6.5 Directors' Inspection Rights. Every Director shall have the absolute right at any reasonable time to inspect the corporation's books, records, and documents of every kind, and to inspect the physical properties of the corporation. The inspection may be made in person or by the Director's agent or attorney. The right of inspection includes the right to copy and make extracts of books, records, and documents of every kind.

ARTICLE SEVEN - COMPLIANCE WITH MEDICAL MARIJUANA LAWS

7.1 Health & Safety Codes. At all times while such statutes remain in effect, the Corporation shall ensure that all relevant operations strictly comply with Health & Safety Code sections 11362.5 *et seq.* The to extent any such provisions are amended or repealed, the Corporation shall comply with any an all applicable statutes and regulations enacted, adopted or promulgated with regard to Medical Marijuana in the State of California, including the Medical Marijuana Regulation and Safety Act.

7.2 Medical Marijuana Regulation and Safety Act ("MMRSA"). It is contemplated that these bylaws – and any provision herein, including this Article Seven – will be amended to conform to the requirements of the Medical Marijuana Regulation and Safety Act at whatever time and to whatever extent such provisions may be applicable to this Corporation, and to the fullest extent possible to conform this Corporation to the operating standards available under the MMRSA, including the merger or conversion (if available) of this Corporation with or to a for-profit entity.

7.3 Business Licenses, Sales Tax, and Seller's Permits. As the State Board of Equalization has determined that medical marijuana transactions are subject to sales tax, regardless of whether the individual or group makes a profit, and those engaging in transactions involving medical marijuana must obtain a Seller's Permit, the Board shall be responsible for obtaining such permit and paying all related taxes. The Board is further responsible for obtaining any and all operating licenses if available and must appropriately pay for any and all related fees or taxes.

7.4 *Patient Membership Application and Verification Procedures.* When a patient or primary caregiver wishes to become a member, the applicant must complete a written membership application to help ensure that marijuana grown for medical use is not diverted to illicit markets. In addition, the corporation shall verify the individual's status as a qualified patient or primary caregiver. Unless he or she has a valid state medical marijuana identification card, the corporation shall:

- a. Make personal contact with the recommending physician (or his or her agent), and verify the physician's identity, as well as his or her state licensing status. Verification of primary caregiver status shall include contact with the qualified patient, as well as validation of the patient's recommendation;
- b. Retain a copy of the physician's recommendation or identification card, if any;
- c. Require the individual go through the intake process, sign the membership agreement, agree not to distribute marijuana to non-members, and agree not to use the marijuana for other than medical purposes;
- d. Maintain membership records on-site or have them reasonably available;
- e. Track when Members' medical marijuana recommendation and/or identification cards expire; and
- f. Enforce conditions of membership by excluding any member whose identification card or physician recommendation are invalid or have expired, or who has been found to be diverting marijuana for non-medical use.

7.5 *Acquisition, Possession, and Distribution of Only Lawfully Cultivated Marijuana.* To the extent required by applicable law, the corporation shall acquire marijuana only from its constituent members, because only marijuana grown by a qualified patient or his or her primary caregiver may lawfully be transported by, or distributed to, other members. The corporation may then allocate it to other members of the corporation. Nothing allows marijuana to be purchased from outside the corporation for distribution to its members. Instead, the cycle must be a closed circuit of marijuana cultivation and consumption with no purchases or sales to or from non-members. To help prevent diversion of medical marijuana to nonmedical markets, the corporation shall document each member's contribution of labor, resources, or money to the corporation. The corporation shall also track and record the source of the marijuana.

7.6 Distribution and Sales to Non-Members are Prohibited. Neither the corporation nor any of its members shall distribute medical marijuana to any person who is not a member in good standing. The corporation may credit its members for marijuana they provide to the corporation, which it may then allocate to other members. Members also may reimburse the corporation for medical cannabis that has been allocated to them. Any monetary reimbursement that any member provides to the corporation shall only be an amount necessary to cover overhead costs and operating expenses.

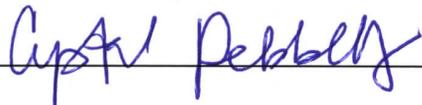
7.7 Permissible Reimbursements and Allocations. Cannabis grown by and for the qualified members of the corporation may be:

- a. Provided free to qualified patients and primary caregivers who are members;
- b. Provided in exchange for services rendered to the corporation;
- c. Allocated based on fees that are reasonably calculated to cover overhead costs and operating expenses; or
- d. All of the above.

7.8 Security. The corporation shall undertake its best efforts to provide adequate security to ensure that members are safe and that the surrounding homes or businesses are not negatively impacted by nuisance activity such as loitering or crime. Further, to maintain security, prevent fraud, and deter robberies, the corporation shall keep accurate records and follow accepted cash handling practices, including regular bank runs and cash drops, and maintain a general ledger of cash transactions.

**CERTIFICATE OF SECRETARY OF
URBAN HILLS, INC.**

I hereby certify that I am the duly elected and acting Secretary of this Corporation and that the foregoing Bylaws constitute the Bylaws of this Corporation, as duly adopted by the Board of Directors on January 11, 2016.



Crystal Pebbles, Secretary

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Secretary of State
State of California

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FEB 22 2016

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RESTATED ARTICLES OF INCORPORATION

The undersigned certify that:

1. They are the president and secretary, respectively, of Urban Hills Cooperative, Inc., a California Consumer Cooperative Corporation.
2. The Articles of Incorporation of this corporation are amended and restated to read as follows:

ARTICLE I: NAME OF CORPORATION

The name of the corporation is Urban Hills, Inc.

ARTICLE II: PURPOSE OF CORPORATION

This corporation is a nonprofit mutual benefit corporation organized under the Nonprofit Mutual Benefit Corporation Law. The purpose of this corporation is to engage in any lawful act or activity other than credit union business for which a corporation may be organized under such law.

3. The foregoing amendment and restatement of Articles of Incorporation were duly approved by the board of directors.

4. The foregoing amendment and restatement of Articles of Incorporation were duly approved by the required vote of members in accordance with California Corporations Code §§ 12224, 12503. The total number of members entitled to vote with respect to the amendment was four, approval of all members was required to approve the amendment, and all members have approved the amendment.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

Dated: January 11, 2016

Dustin Pebbles, President

Crystal Pebbles, Secretary

Proposed amendments to the articles of incorporation of a corporation must be approved by a majority of the members of the corporation. The amendments must be approved by a majority of the members of the corporation at a meeting of the members of the corporation. The amendments must be approved by a majority of the members of the corporation at a meeting of the members of the corporation.



OFFICE OF THE SECRETARY OF STATE

STATE OF CALIFORNIA

1000 STREET, SACRAMENTO, CALIFORNIA 95833



I hereby certify that the foregoing transcript of 1 page(s) is a full, true and correct copy of the original record in the custody of the California Secretary of State's office.

FEB 23 2016

Date: _____

Handwritten signature of Alex Padilla in cursive.

ALEX PADILLA, Secretary of State

URBAN HILLS 00131



COMPLIANCE INDEX

Urban Hills

Marin County Medical Cannabis Dispensary Application
230 Shoreline Highway - Mill Valley - California - 94941

Dustin Pebbles
Crystal Pebbles

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URBAN HILLS 00132

Written Response to Criteria for Review (6.85.061)

A) Urban Hills is currently in the process of obtaining a permit to operate a medical cannabis dispensary facility in Marin County, California and will operate in full compliance with letter and intent of the Compassionate Use Act (Proposition 215), its implementing statutes - the Medical Marijuana Program Act ("MMPA") and the Medical Cannabis Regulation and Safety Act ("MCRSA"), all related state laws, and all applicable sections of the Marin County Code. To this end, the Collective has adopted operating plans and procedures that are based on current best practices as demonstrated both by currently licensed California operators, and operators in the states of Colorado, Washington and Oregon— which have implemented medical cannabis programs similar to California. Specifically, Urban Hills will implement operational standards according to these best practices, as outlined by Marin County Ordinance 3639 (Marin County Code Chapter 6.85), and (as they are enacted) all regulations issued by the Department of Consumer Affairs, Bureau of Medical Cannabis Regulation related medical cannabis dispensaries to be licensed under the MCRSA.

B) The Urban Hills medical cannabis dispensing facility will be located in the Tam Junction area of unincorporated Marin, County. According to crime statistics by RAIDSOnline, the Tam Junction is not identified as an area having a significant rate of crime.

C) Neither of the applicants—Dustin Pebbles and Crystal Pebbles—is under the age of 18. Identifying materials have been provided. Employee hiring procedures will require and verify that all employees are at least 18 years of age.

E) Urban Hills is not currently in operation, but has provided all of the proper application materials that have been requested by the County. Urban Hills commits to complying with all operating requirements and standards specified in Marin County Code Chapter 6.85.

F) The Applicants—Dustin Pebbles and Crystal Pebbles—have paid all the appropriate application fees and intend to satisfy all reporting requirements in a timely manner.

G) The proposed facility for the Urban Hills dispensary has a total size of approximately 3,700 square feet. This space will be divided amongst a variety of dispensary requirements, including limited access areas where qualifying patients may not enter. This space is reasonable for the estimated number of patients. The site also includes sufficient parking space. The dispensary will also offer delivery services and incentives to reduce patient visits per month. Together these features will minimize the dispensary's adverse impact on the surrounding neighborhoods. The dispensary will not increase its size without a prior approval amending the existing dispensary license.

Urban Hills has conducted in-depth market research to estimate the number of qualifying patients to be served by a dispensary in the centrally located Tam Junction area. These patient projections, subsequently, have been used to support Urban Hills' monthly inventory of medical cannabis flower and medical cannabis related products. At no times, will the size of Urban Hills' inventory exceed the amount allowed to be allocated to each patient as promulgated under ordinance 3639.

By designing our facility based on expected qualifying patient flow and frequency, we can ensure a safe, secure and welcoming experience for all those involved.

To that end, Urban Hills has designed the facility to organically meet the expectations of the community that we intend to serve. This philosophy is reflected in all aspects of our design: from the exterior décor that has been chosen to compliment the aesthetics of Tam Junction; to the floor plan and spatial arrangement that is intended to minimize patient waiting times and maximize operating efficiency.

H) The location - 230 Shoreline Highway -- is fully compliant with local and state ordinances pertaining to the dispensing of medical cannabis products. Additionally, the Company has taken measures to negate any negative impact on the community, and any nuisance its presence may create. The building is 3,700 square feet, and has ample room on the lot for parking, which will help alleviate concerns from neighboring businesses. The interior of the dispensary will have a modern design that reflects the local charm of Marin County, and the building will feature an exterior with extensive greenery and low-impact landscaping, drought tolerant bioswale, stormwater mitigation, and permeable paving.

The spaces created at Urban Hills will blend seamlessly with the urban fabric of Tam Junction and the natural landscape of greater Marin County with a design that is sensitive to local context, energy efficient with sustainable design features and material choices throughout, and a pioneering model for future businesses in an emerging market.

I) In compliance with section 6.85.02, subsection I of Marin County Ordinance 3639, Urban Hills will take all proper measures to ensure the absolute safety of the immediate community by installing the proper security, surveillance, and alarm systems. Specifically, Urban Hills' site plan, floor plan, and security plans each incorporate features necessary to assist in reducing potential crime-related problems.

The security plan includes on-site security; rigorous procedures for allowing and limiting entry; detailed surveillance and control of the premises; oversight of the perimeter and monitoring activities on surrounding properties; methodologies to minimize loitering and traffic congestion, building elements that eliminate opportunities for congregating and obstructing public ways or neighboring properties; and proper illumination of exterior areas. A more detailed description of these measures is enclosed in the full Security Plan.

The Company's site plan, floor plan, operational plan, security and lighting plan each have been designed to provide maximum security. This includes implementing Standard Operating Procedures for patient management both inside and outside of the facility.

During the hours of operation security guards will not only be present for patient assistance and viewing, but will also have access to monitor the camera systems at all times. While our security guards will assist in guiding patients into parking spaces to help avoid impeding traffic, they will also serve as a surety that no underage or non-patients are on the property at anytime. The security team will also monitor the doors of the facility as well to insure all patients have proper identification prior to entry. Any and all loitering will be strictly prohibited and immediately addressed.

Urban Hills Security Plan will help establish a safe and secure facility for the dispensing of medical cannabis, and medical cannabis related items (concentrates, extracts, topical solutions, etc.).

The Floor plan for the facility has been designed for optimal patient flow and maximum security. Qualifying patients will be required to provide a valid, current form of California state-issued identification card and physician's medical cannabis recommendation before entering the reception area of the facility. Once inside, an Urban Hills staff member will verify the patient's credentials and escort them into the dispensary area. Only a limited number will be allowed in the dispensary area at any given time, meaning that other patients will remain in the reception area until the dispensary is ready to serve them. Secure doors will be installed on the main entrance of the facility and the access point between the reception and dispensary areas. Pursuant to the security plan, high definition surveillance cameras will be installed at the main entrance and the access point between the reception and purchasing areas.

J) No member of the Urban Hills team has violated any provision outlined in Marin County Code Chapter 6.85. This includes any action that would be grounds for the suspension, modification or revocation of any license awarded to Urban Hills to dispense medical cannabis.

K) Urban Hills has incorporated into the plan standard operating procedures that will ensure employees consistently take all reasonable measures to successfully control the establishment's patrons' conduct resulting in disturbances, vandalism, crowd control inside or outside the premises, traffic control problems, ingesting cannabis in public, creation of a public or private nuisance, or interference of the operation of another business. An overview of these measures has been included here in this Compliance Index in addition to the detailed descriptions of each found in the accompanying application documents.

Urban Hills is fully committed to enhancing the quality of the immediate community, and will accordingly promulgate standards of conduct to which our employees and patients will be required to adhere to at all times. These conduct policies as well as Urban Hills' operating standards will foster a "good neighbor" relationship between Urban Hills and neighboring business owners and entrepreneurs, and will be designed to negate any potential public nuisance before it ever materializes.

Urban Hills' security staff will take the detailed measures set forth in the Security Plan to prevent any loitering, disturbances, vandalism, or public nuisance caused by any of the Company's patrons. These include efforts to negate traffic control in and around the premise, and to prevent any action that will disturb the operation of a neighboring business establishment.

Urban Hills will have a strict policy stating No Redistribution of Cannabis Medicines is Allowed. It is imperative that all collective members understand this rule and that staff implements specific policies to support it. The CEO 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.

The CEO and COO will assure that Urban Hills 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 CEO 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. The Urban Hills CEO and COO will maintain a good relationship with the Marin County Sheriff's Department and Mill Valley Police Department. It is essential that UH be able to count on the Sheriff's Department to assist in enforcing this law, if needed, and for the Sheriff Department to be able to depend on Urban Hills' systems to prevent violations.

L) Urban Hills is aware of the impact that its presence may create, and has therefore taken measures to ensure that the health, peace of safety of persons living or working in the surrounding area are not affected in an adverse way. To this end, the Company will implement a Good Neighbor Policy that is designed to negate any burden caused by the Company, especially in neighborhoods with specific needs or that are regarded as high impact usage. The Company's Good Neighbor Policy will deter any threat posed by the Company or its patrons as a public nuisance.

Standard Operating Procedures will be implemented for strict patient management—inside and outside of the facility. By actively organizing our expected flow of patients, Urban Hills can better negate traffic and congestion in the Tam Junction area.

The Company's Security Plan, additionally, will include measures to handle the outgoing flow of patients as to prevent loitering or any potential illegal diversion. This will help eliminate the potential for any littering, illegal parking, loud noises, inappropriate conduct and illegal activity.

Urban Hills will create a dispensary environment that blends into its natural surroundings while giving patients a safe, relaxing space to choose their medicine. The building itself has been designed by Eric Spletzer, PE of Crafted Earth, Inc. – a San Rafael Engineering, Design, and Building firm – who will create a rustic and serene environment inside and out. E&D Builders, a licensed contractor, will handle all aspects related to construction. The exterior of the building will feature landscaping with a mix of drought-tolerant bioswale, plants, trees, and bushes, while the inside will feature shiplap wood, slate floors and an overall aesthetic that's in harmony with the community and surrounding environment.

Our management team researched local traffic patterns, and will propose a number of strategies to mitigate any potential issues with traffic and parking. For instance, to ease the local traffic impact, Urban Hills will offer patients incentives to visit the dispensary during off-peak hours, and utilize the online ordering and express pick-up or delivery services.

M) All members of the Urban Hills team have fully abided by all County Codes and/or conditions that have been imposed by the County for the dispensing of medical cannabis, and will continue to do so. Furthermore, Urban Hills acknowledges that no team member has violated any state, local or county level provision pertaining to the issuance of such a license.

N) Neither of the applicants—Dustin Pebbles, Crystal Pebbles—has at any time violated any local or state laws, statutes, rules or regulations respecting the distribution, possession, or consumption of cannabis. Livescan background checks have been provided, as required by the County.

O) Dustin Pebbles and Crystal Pebbles acknowledge that they have not knowingly made any false statements of material fact; nor have either individual knowingly omitted to the State a material fact in the application for license.

P) No managing member of the Urban Hills team will have been convicted of any felony, misdemeanor involving moral turpitude, or misconduct related to the qualifications, functions or duties of a licensee. Urban Hills has implemented strict hiring practices, and will perform background checks and screens on all individuals interested in employment with the Company. Managers that are employed by the Company, and have been found to violate any of the aforementioned standards or policies, will have their employment immediately terminated. This includes the conviction for any crime deemed violent in nature.

Q) Neither of the applicants—Dustin Pebbles, Crystal Pebbles—has engaged in unlawful, fraudulent, unfair, or deceptive business acts or practices.



BUSINESS PLAN AND OPERATIONS

Urban Hills

Marin County Medical Cannabis Dispensary Application
230 Shoreline Highway - Mill Valley - California - 94941

Dustin Pebbles
Crystal Pebbles

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URBAN HILLS 00138

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SECTION 1 Business Plan

Executive Summary

Urban Hills, Inc. (“Urban Hills”) is a medical cannabis dispensary dedicated to providing patients in Marin County with safe, convenient access to a wide range of high-quality medical cannabis products.

Urban Hills understands that patients need knowledgeable experts to help them make informed decisions about medical cannabis and the treatments that will best suit their conditions and lifestyles. By providing a wide variety of strains and products in different delivery formats, patients will have many options for treating their conditions and symptoms.

A new emphasis on patient wellness has emerged in the United States, and it entails long-term management of chronic conditions as a quality of life issue. Medical cannabis can be a valuable part of managing chronic symptoms and conditions, and can also help mitigate the harmful side effects of prescription medications that patients are using.

Urban Hills looks forward to hosting wellness experts and speakers who actively encourage the health of our patients and members. As a service company, we are dedicated to forming long-term relationships with our patients and the local community, and are committed to embracing high standards, from our employee training to our customer service to our community outreach. Our staff will make product recommendations to patients for specific conditions based on the latest medical cannabis research.

The facility Urban Hills has chosen for its dispensary is located at 230 Shoreline Highway. The building is 3,700 square feet, and has ample room on the lot for parking, which will help alleviate concerns from neighboring businesses. The interior of the dispensary will have a modern design that reflects the local charm of Marin County, and the building will feature an exterior with extensive greenery and low-impact landscaping, drought tolerant bioswale, stormwater mitigation, and permeable paving. The spaces created at Urban Hills will blend seamlessly with the urban fabric of Tam Junction and the natural landscape of greater Marin County with a design that is sensitive to local context, energy efficient with sustainable design features and material choices throughout, and a pioneering model for future businesses in an emerging market.

Urban Hills has built a strong management team and advisory committee with valuable experience in medical cannabis dispensary operations, and other relevant experience and skills that will help grow the business guided by strong values and a cohesive, strategic vision.

Compliance with local and state licensing regulations is another critical part of Urban Hills’ mission and foundation. As a first step, Urban Hills has engaged some of the most experienced and knowledgeable dispensary operators and consultants in the Bay Area to assist in designing standard operating procedures (SOPs). Some of these strategic partners will be contracted to train the staff to ensure that Urban Hills has a highly skilled and knowledgeable workforce from the first day the doors open.

Mission and Philosophy

Urban Hills' philosophy is that optimal health and pain management can be attained through alternative medicine, therapy, exercise, nutrition, and education. The Urban Hills mission is to provide medical cannabis to patients and promote their overall health and well-being through education and a variety of wellness services.

The most important factors in designing Urban Hills' facility were respecting patient privacy and maintaining a low profile, low impact operation that is considerate of neighbors and the surrounding community. The management team has researched local traffic patterns, understands the significant challenges presented, and will propose a number of strategies to mitigate traffic and parking impacts. For example, Urban Hills will offer patients incentives to visit the dispensary during off-peak hours, to use alternative modes of transportation, and to utilize online ordering and express pick-up or delivery services.

Urban Hills will maintain privacy according to Health Insurance Portability and Accountability Act (HIPAA) rules. Urban Hills will hold no prejudice to race, creed, color or socioeconomic status. Every medical cannabis patient will be welcome at the dispensary, and no one will be turned down for medical consultations.

Some of Urban Hills' first-year goals include:

- Creating a medical cannabis and wellness center that features a modern, engaging design aesthetic suited to the sophisticated tastes and sensibilities of Marin County patients
- Hiring and training a knowledgeable, friendly staff who will engage patients at every step of the process of selecting appropriate medicine to treat their conditions
- Providing high-quality products, care and education to patients
- Developing a comprehensive website that offers home delivery as well as provides additional information about the center, hours, demographic information, health information and much more.

Urban Hills will not tolerate any discrimination on the basis of race, creed, color or socioeconomic status and will implement policies to ensure that every qualified medical cannabis patient with a valid recommendation feels welcome at the dispensary.

Management Team

Urban Hills' management team and Advisory Board are composed of cannabis industry professionals and consultants with decades of experience building start-ups and managing small businesses. Co-founders Dustin and Crystal Pebbles are longtime residents of Northern California and have operated multiple businesses in Sonoma County over the last 10 years.

Dustin Pebbles, Founder and CEO

Dustin Pebbles has built and managed a variety of small businesses in both California and Utah over the last 20 years. Since 2005, he has been a business owner and entrepreneur in Sonoma since when he became involved in the cannabis industry as the owner of Green Universe garden supply stores in Sonoma and Calistoga. Additionally, he has built a small business consulting company, Urth Enterprises, which advises clients on best practices for indoor cultivation operations. As the owner of Green Universe, OG Tea Company and Urth Enterprises — all Sonoma-based companies — he has clearly demonstrated the background and experience to build a modern, patient centered dispensary providing only the highest quality products.

In addition, Dustin has ample expertise operating in compliance with state and local regulations. Not only was Dustin granted one of the few licenses to cultivate medical cannabis by the State of Nevada, but he was first licensed by a state regulatory agency at the age of 23 when he was the youngest person ever to be granted a liquor license by the State of Utah. As a result, Dustin understands well the legal process and responsibility that comes with owning and operating a highly regulated medical cannabis enterprise.

In 2002, Dustin built The Cabinet's Edge, a highly successful kitchen and cabinetry design company, which he sold in 2007. While transitioning from Utah to California he acted as COO and helped start up a mobile technology company now known as Nimbus.

Crystal Pebbles, Chief Operations Officer

Crystal has an extensive knowledge of processes and products used for the cultivation of medical cannabis, and her industry knowledge and business development skills will be an asset to Urban Hills in every phase of its operations.

Crystal helped build The Cabinet's Edge from the ground up, and served as Vice President of Accounting and Administration. After the sale of The Cabinet's Edge, Crystal co-founded and developed many small companies including Tanglewood Cabinets, Urth Enterprises, E-Boutique and Fleet-Fly Inc. Crystal acted as Secretary and Treasurer for the technology start up Fleet Fly Inc., sister company to Celio Corp, and now known as Nimbus. Crystal has been critical to the success of consulting from Urth Enterprises L.L.C. over the past 10 years. As lead consultant for Urth Enterprises she has developed accounting systems, office operational procedures, Human Resource procedures, IT Direction and a dozen other pertinent roles needed for the start up and restructuring of small businesses.

Currently, Crystal is Head of Accounting and Administration for Green Universe Inc. (Nevada Corporation), Lead Consultant Urth Enterprises, and Executive Administrator of OG Tea Company.

Dave McCullick, General Manager

Dave McCullick has been an owner and manager of cannabis businesses for more than 10 years, and is a teacher and scholar who has dedicated much of his life to promoting the cause of medical cannabis. In his current role as General Manager of Magnolia Wellness in Oakland, CA., he oversees daily operations and training at one of the most well-respected dispensaries in the Bay area.

Dave started his first dispensary, D&M Compassion Center, in Clearlake, California in 2005. In 2008, he sold D&M and started Sonoma Patient Group in Santa Rosa. In 2009, he became a professor at Oaksterdam University, teaching classes in Dispensary management, Dispensary Operations, and Cannabis Business. He continues this work today, and also travels the country several times a year lecturing on various cannabis subjects as well as teaching Cannabusiness and Regulatory Compliance classes.

Dave has written for many trade industry magazines including West Coast Cannabis, Treating Yourself Magazine, as well as Alternet.org. He also sponsored Lake Counties first Medical Cannabis Cup in 2006.

Dave is a U.S. Navy veteran and long-time Electronics Technician and Manufacturing Engineer.

Advisory Committee to the Board of Directors

Larry Bedard

Dr. Larry Bedard has practiced emergency medicine for more than 30 years, and is a longtime member of the Marin Healthcare District board.

From 1979 to 2001, Larry worked in Marin General Hospital's Emergency Department, and is an active advocate on medical issues at the local, state, and national levels. He is former President of the American College of Emergency Physicians (ACEP), President of the California chapter of the ACEP, Trustee of the California Medical Association, and President of the Marin Medical Society. He received his undergraduate and medical degrees from the University of Michigan.

Debby Goldsberry

Debby Goldsberry is among the most accomplished activists in the cannabis community, with more than 25 years of industry experience and ties to a wide variety of non-profit organizations.

Debby co-founded the Berkeley Patients Group (BPG) in 2000. She went on to direct the organization for 11 years as it became one of the most successful dispensaries in northern California. Debby has since parted ways with BPG and went on to co-found Communicare Centers - a collective dedicated to standardized cannabis medicines.

In addition to her work with dispensaries, Debby has a long history of involvement with cannabis policy movements. She co-founded Americans for Safe Access, the Medical Cannabis Safety Council, and the Cannabis Action Network (CAN), which influenced the creation of Students for Sensible Drug Policy and the Marijuana Policy Project.

Debby also supports the causes of others as well as her own. For example, she volunteers with the NORML Women's Alliance and formerly served as a boardmember for Marijuana Policy Project.

Debby has received numerous awards in the past to honor her work for the cannabis community. She has twice been named the High Times Freedom Fighter of the Month, and received Freedom Fighter of the Year for 2011-12. Furthermore, NORML awarded Debby with the Paula Sabine Award for Women in Leadership in 2005.

Jeff Jones

Jeff Jones has provided expertise in the medical cannabis field to Californians for over 20 years. Jeff's horticulture knowledge, troubleshooting skills and easy manner make learning the basics easy for beginners and a challenge for the experts. Jeff co-founded the Oakland Cannabis Buyers' Cooperative (OCBC) in 1995, in the process launching the downtown cannabis-friendly area known as "Oaksterdam" (named after the first two cities to regulate marijuana). With Jeff's assistance, the City of Oakland became the first U.S. City to contract with a medical cannabis provider back in 1998, and implement a successful city program to issue compassionate provider permits in June of 2004. Jeff proved self-regulatory practices that would eventually become the tenets of Senate Bill 420 and the Attorney General Guidelines of 2008.

Jeff was named defendant in the OCBC Federal Civil case, one of the longest-running medical cannabis cases in history as it traveled all the way through the Supreme Court. His active involvement with the Patient ID

Center (formerly OCBC) has shared his expertise with hundreds of thousands of medical cannabis patients, professionals and experts. The mission carries on the tradition of issuing private ID cards and offering patient services, education, and referrals to compassionate provider groups, caregivers and lawyers in California. Jeff also helped establish Alameda County Patient Services, which provided patients and caregivers official Medical Marijuana ID cards in Alameda County, California. He has been educating professionally as the horticulture expert, politics and history instructor for Oaksterdam University since 2007.

In 2010, Jeff was co-proponent of the Prop 19 Tax and Regulate Cannabis Act, hoping to take the target off the backs of medical patients. Jeff now serves on the Board of the Coalition for Cannabis Policy Reform (CCPR) and has two young sons with Dale Sky Jones.

Howard Keum

Howard Keum is the Founding Partner of HWC Nevada Holdings LLC which is a investment holdings company specializing in investing in the cannabis industry where he has built a network of industry relationships, investors, and specialists within the space.

Howard is currently a Managing Director at Cantor Fitzgerald specializing in Asia Pacific Equities where his last management role was as Managing Director where he was responsible and managed over 70 employees directly and indirectly in their Hong Kong offices prior to moving back to the United States to continue a similar role. Prior to this role, he was the top producer in Asia Pacific Equities for Knight Capital Group's Hong Kong Offices personally producing more than \$10,000,000 in net commissions on top of managing a team of Asia Pacific sales traders that worked directly for him.

In addition, outside of his business related activities, he also serves on the executive board of Tournament Hills Summerlin Board of Directors serving as the treasurer. Howard also is a fund raiser for Toys for Tots Marines of Las Vegas as well has fund raising for Koreatown Youth Community Center of Los Angeles.

Hyong-gue Michael Bang

Hyong-gue Michael Bang is a highly accomplished equity research professional with over 18 years of experience working with leading global investment banks, including Goldman Sachs, Macquarie Securities, ING Financial Markets, and Nomura International. Michael is also a strong leader with proven management skills. As the Head of Regional Technology Research and the Head of Korean Technology Research, Michael was responsible for leading teams as large as 30 professionals.

In addition, Michael has acted as an informal consultant to global technology companies on topics ranging from company valuation, global supply and demand dynamics, competitive market dynamics, to retail consumer trends. He is currently the principal and founder of 2116284 Ontario Ltd., which specializes in commercial real estate investments.

Michael's expertise in finance and company valuation has aided in raising investor capital for HWC Nevada Holdings where he acts as CFO. HWC Nevada is an investment holdings company specializing in investing in the cannabis related industry.

TBD: Two Marin County/Tam Junction Community Members to serve as advisors regarding local considerations, to ensure that Urban Hills and its staff understand and address the needs and concerns of the community.

Legal Compliance

Compliance with local and state medical cannabis regulations is of utmost importance in establishing a safe and successful dispensary business. As such, Urban Hills has assembled an exceptional management team and partners who together have decades of experience in dispensary operations and compliance.

During construction in Phase 1 of the project, the Urban Hills management team and advisors will begin training and orientation for the staff at a remote location, instructing new employees on all facets of operations and compliance.

Dave McCullick will lead the training of the Urban Hills staff, with Debbie Goldsberry participating as an expert advisor. As one of the Bay Area's first dispensary managers, starting with Berkeley Patients Group in the 1990s, Debby has been training dispensary employees and managers for almost two decades.

Another accomplished Urban Hills advisor is Jeff Jones, who co-founded the Oakland Cannabis Buyers' Cooperative (OCBC) in 1995, and has been a determined leader in the development of the Bay Area medical cannabis industry.

Once granted an dispensary license, the Urban Hills team will begin its training programs for managers and begin the interview process for new employees. The management team will also begin vetting cannabis vendors and products, and setting up contracts with licensed operators and distributors.

Additionally, Urban Hills retains the law firm Clark Neubert LLP to advise the collective regarding compliance with current state law requirements and the implementation of the Medical Cannabis Regulation and Safety Act (MCRSA). Partner Nicole Howell Neubert, a Marin resident, works closely with the management team to ensure that operations and procedures remain in strict compliance with state and local laws.

Operations Overview

Urban Hills' management team understands that Marin County has a unique and stunning natural environment, and local residents who value environmental protection and preservation, as well as fairness and accountability to the community. We share these philosophies, and will make Urban Hills an attractive and special place to work for our employees, and a comfortable place for patients to learn about cannabis treatments and obtain their medicine.

Urban Hills will create a dispensary environment that blends into its natural surroundings and has a rustic, serene environment inside and out. The building itself will be designed by Crafted Earth, Inc., a Marin County business that is located in San Rafael. The exterior of the building will feature landscaping with a mix of drought-tolerant bioswale, plants, trees, and bushes, while the inside will feature shiplap wood, slate floors and an overall aesthetic that is in harmony with the surrounding community.

We want our patients to have a safe, comfortable feeling when they come to our dispensary, which will help us build long-lasting relationships. While they wait for a personalized interaction with an Urban Hills staff member, patients will have access to LCD screens inside the dispensary with scrolling information, and tablet devices available for more in-depth research and education. These tools will help to educate patients on the benefits of cannabis, and the recommended treatments for their symptoms and illnesses.

One of the best ways to integrate Urban Hills smoothly into the Marin County and Mill Valley communities is to hire local residents who know it best. As such, Urban Hills will reach out to the local community in its job postings and encourage residents to apply for positions as they become available. These jobs will be offered at a Marin County “living wage” level and will include benefits packages for full-time employees. Recognizing that Marin County generally, and the Tam Junction corridor in particular, has traffic congestion problems, Urban Hills is dedicated to reducing car traffic to our dispensary. We will provide incentives for patients to visit the dispensary during off-peak hours, and utilize our convenient online ordering and delivery services.

The building at 230 Shoreline Hwy is 3,700 square feet. The lot has ample room for parking, which will help alleviate concerns from neighboring businesses. The interior of the dispensary will have a modern design that reflects the local charm of Marin County, and an exterior with extensive greenery and drought-tolerant bioswale. In order to blend seamlessly with the unique landscape and natural surroundings in Marin County, Urban Hills will design its dispensary with environmental sustainability and harmony as a primary goal, inside and out.

Management

Urban Hills has a comprehensive Management and Operations Manual included with this application. The manual contains step-by-step procedures detailing how each process will be created, implemented, and supervised, in order to assure that dispensary operations are consistent with State and County laws. The manual includes six distinct chapters: General Operations, Inventory Management, Patient and Caregiver Registration and Recordkeeping, Point of Sale Operations, Staffing, and Security.

The Board of Directors are the primary managers of Urban Hills, and will appoint and guide its senior management staff. The Chief Executive Officer (CEO) supervises all dispensary operations, maintaining control of all procedures. The Chief Operations Officer (COO) manages the dispensary’s daily operations, ensuring that all policies in the Management and Operations Manual are implemented and supervised, and that they are updated as needed.

Training and Policies

To educate members about dispensary policies, the COO will create training materials, including flyers, spoken script and posted signs. The COO and General Manager will work together to train all staff members on company policies, giving each person a view of the full system in place to prevent, observe and report violations of this policy.

During registration, the receptionist will review company policies with each member, stressing the importance of following the rules at all times. Each member will be given a notice outlining company policies, and will sign a pledge agreeing to them. Members will be educated about the fact that a single violation of this policy will result in immediate revocation of their membership.

Urban Hills will have a strict policy stating No Redistribution of Cannabis Medicines is Allowed. It is imperative that all collective members understand this rule and that staff implements specific policies to support it. The CEO 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 the law.

Urban Hills will package all medical cannabis with a warning against redistribution. Staff will assure that each package of medicine at Urban Hills is labeled with a warning stating that it is not for redistribution. The COO

and General Manager will train staff, especially outside Security, to implement these policies, and they will provide tools for complete investigations into these matters, including reporting forms video feed footage access.

The CEO and COO will assure that Urban Hills 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 CEO will assure that all neighbors have contact information for our General Manager, so that they can report any violations to them. The Urban Hills CEO and COO will maintain a good relationship with the Marin County Sheriff's Department and Mill Valley Police Department. It is essential that Urban Hills be able to count on the Sheriff's Department to assist in enforcing this law, if needed, and for the Sheriff Department to be able to depend on our systems to prevent violations.

Wellness Services

Urban Hills looks forward to hosting wellness experts and speakers who actively encourage the health of our patients and members. As a service company, we are dedicated to forming long-term relationships with our patients and the local community, and are committed to embracing high standards, from our employee training to our customer service to our community outreach. Our staff will focus on educating patients on the various approaches that are recommended for specific conditions, based on the latest research and studies conducted on medical cannabis and its complex chemical compounds.

Delivery Services

The Urban Hills delivery service will be available to qualified patients to provide safe, convenient access to medicine in Marin while mitigating the amount of traffic on the roads near the dispensary. We project that a delivery service would reduce the number of vehicles on the road by 25-50 cars per day to start, and the service would grow at a steady rate.

Urban Hills will begin its delivery operations with one electric car and adding more cars as the patient base grows. Urban Hills plans to sign a lease with a Marin County car dealership for a compact, unmarked vehicle for safe transportation of medical cannabis products.

Urban Hills will verify each prospective patient according to standard verification policies (detailed in Standard Operating Procedures), which align with state and local laws. Each patient while signing up to become a member will be notified of our delivery service availability, benefits and programs.

A new patient will be able to be verified either within the Urban Hills facility or through verification technologies employed by Urban Hills such as Meadow (delivery and verification software). Once Urban Hills receives all necessary documents and the patient has been verified through our policies, they then will be eligible for delivery with the Marin service area.

*Please See Appendix A for more in-depth information on Dispensary and Delivery operations

Security and Technology Overview

The Urban Hills Security Plan will help establish a safe and secure facility for the dispensing of medical cannabis, and medical cannabis related items (concentrates, extracts, topical solutions, etc.). In compliance with section 6.85.02, subsection I of Marin County Ordinance 3639, Urban Hills will take the proper measures to ensure the absolute safety of the immediate community by installing the proper security, surveillance, and alarm systems.

As a new business in the area, we will take our commitment to the safety and security of Tam Junction very seriously, and will have all Security Plans and Operating Procedures approved by the County Administrator before commencing operations. This will include a review of all lighting and alarm systems, as well as the physical security measures installed at the facility (biometric locks, reinforced doors, etc.)

Customized Security Plan

Urban Hills will retain CannaGuard Security to create a customized security system for its facility. CannaGuard will design the system and work in conjunction with a Marin County security company hired by Urban Hills to train the security staff. This local security company will be responsible for providing guards for the facility during all hours of operation, and maintaining all security systems and protocols, inside and outside of the dispensary.

CannaGuard is an Oregon-based company that works with clients across the U.S., and has installed more than 250 security systems at dispensaries, cultivation centers, and retail marijuana stores. CannaGuard designs, installs, monitors, and manages high-tech systems that feature wireless connections, monitored alarms, alert notifications, 2-way voice, crash and smash protection and mobile app management. CannaGuard's services include:

- Review of security system design
- Discussion of physical usability of system in the space with a local security company
- Contact with the security company during installation.
- Review of equipment list and pieces to ensure physical component requirements are met
- Testing post-install and pre-inspection to ensure all is in order - just like an inspector would

Security Alarms

Urban Hills will engage CannaGuard along with a qualified local security vendor to install, monitor, and maintain a comprehensive electronic security system, including the appropriate lighting solutions and alarm notifications. The security alarm system will feature automatic fail-safes that are capable of detecting power loss. In the event of power loss, the hardware in each security device will submit a power fail notification, causing the system to transition to auxiliary power and notify the monitoring company and on-site security guard. If the auxiliary power runs low, the security alarm system will receive a low battery notification, and will then send another notification to the monitoring company and on-site security guard. We will commission an independent annual inspection to evaluate whether or not the installed equipment should be updated and to review maintenance routines.

The security alarm will have at least a 48-hour battery or other standby power sources in the event of commercial power failure. The security alarm systems are also designed to detect power loss and are programmed to automatically notify the Director of Security of such an event (section 6.85.02, subsection I-8).

In addition, Urban Hills will construct the building with hook-ups for a backup, non-grid power generator, which is capable of running on gasoline, diesel, or similar material, to sufficiently power the dispensary in the event of power loss. In the event of extended power loss, the Company has identified long-term industrial generator rental options nearby, with the option to purchase such a generator should the need exist.

Surveillance

The facility will be protected by a video surveillance recording system that will monitor the entire perimeter of the dispensary and all entry and access points (section 6.85.02, subsection I-6). The surveillance system will be maintained and will remain operational 24 hours a day, 365 days a year without interruption. We will store all digitally recorded security video footage for a period of no less than seven days (section 6.85.02, subsection I-7). All video surveillance recordings will include a date and time stamp for every recorded frame, and are designed to record images in high quality and high resolution so as to clearly capture revealing facial detail.

Urban Hills will use motion-detected video as well as alarm motion sensors for additional security. The cameras themselves are motion detectors and will trigger video recording upon movement. External alarm motion sensors should also be used and can be utilized to set off video recording as well as activation of the alarm system. These systems can be integrated to provide a higher level of security.

To ensure maximum security, all lighting fixtures will be designed and installed to ensure proper surveillance (section 6.85.02, subsection I-5). Our security vendor will ensure that all exterior walls, entry points, and parking areas will be illuminated by high-intensity, commercial-grade, 400-watt area lights, such as General Electric's W4L. Motion-activated lights will be installed to provide supplementary coverage for locations with video surveillance to ensure high quality image resolution. These lights will be scheduled to activate 30 minutes before sunset and to deactivate 30 minutes after sunup.

Controlled Access

Urban Hills will work with the contracted local security company to determine the best doors for external security (section 6.85.02, subsection I-5). The chosen door and frame will incorporate steel construction and will be fire rated for at least one hour. External doors will also have access controls that require three levels of security verification, including biometric confirmation, a security code, and a key. The front entrance door will only require this verification outside of regular business hours.

Secure Storage

In order to control access and to prevent any unauthorized or illegal attempt to intrude, the Company will design and build a secure room that will only have one entrance door that meets commercial security standards (section 6.85.02, subsection I-2). Urban Hills is aware that any secure room is only as secure as its weakest element, and will work closely with the general contractor to ensure the secure room and its entry point maximize the physical security of the medical cannabis inventory and comply with building codes.

Cameras

Urban Hills will utilize a minimum of a 2-Mega pixel security camera system in High Definition as to ensure the ability to clearly view any possible violators or threats. The camera system will include 24 hour monitoring and recording with seven day storage and remote access for off-site viewing should management or the local police department require viewing in the event of an alarm trigger. All doors and windows will be armed with an alert system to initiate a sound alarm along with an alert to a private security company for monitoring. Built into all cameras is the ability for motion sensing in any desired location for detecting unwanted intruders.

All entrances, exits, floor area, packing room, and property will be fully visible through the camera system at all times.

During the hours of operation security guards will not only be present for patient assistance and viewing, but will also have access to monitor the camera systems at all times. While our security guards assist in guiding patients into parking spaces to help avoid impeding traffic, they will also serve as a surety that no underage or non-patients are on the property at any time. The security team will monitor the doors of the facility as well to insure all patients have proper identification prior to entry.

Safe storage on site is a must. Urban Hills will have an onsite, limited access secured vault. This safe and secure storage will be closed on all sides with a steel door and only accessible by an assigned access code to the proper managing position and officers of Urban Hills. The access to the secure storage will also be monitored 24/7 by recorded security cameras.

To properly manage inventory and to strictly prevent loss or diversion, Urban Hills will adopt the best practices and technologies available on the market. Programs such as MJ Freeway provide inventory and accounting tools that are essential to effective and efficient inventory controls and employee accountability. These very technologies integrate with standard accounting practices so as that Urban Hills can utilize professional accounting services for oversight, management and compliance.

Software Applications

Urban Hills will use the most advanced computer, server and point of sale systems, as well as Internet connections, in order to optimize our technology systems. Utilizing these systems will allow faster patient verification, efficient patient information transfer, reduction in administrative costs, computer breakdown or malfunction, as well as store important information needed about the patient in optimizing the care of the patient.

Other benefits of our technology platform include:

- Reduce risks by improving the quality of documentation, maintaining security and integrity of data
- Maintain and backup documentation to comply with local and state laws
- Manage protocols and track product recalls
- Improve management of referrals and eligibility data
- Reduce expenses by reducing paper storage and paper/forms costs

*Please See Appendix C for more in-depth information on Security protocols

Market Analysis: Marin County

The Compassionate Use Act (“Prop. 215”) allows a physician to recommend medical cannabis for any chronic condition or medical symptom that substantially impacts an individual’s quality of life—allowing for a wide range and diverse population of qualifying patients.

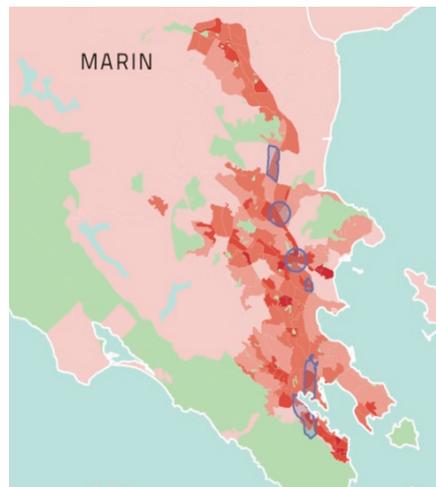
Precise statistics regarding the number of medical recommendations and patients in California are unavailable as the state of California does not mandate that medical cannabis patients register with the state. However, we estimate – based on statistical data derived from Colorado and Arizona – that California’s

potential patient base may be as high as 2.1-3.0 percent of the state's overall population—over 40 percent higher than estimates provided by the Marijuana Policy Project and competing "Market Analysis." Assuming a middle ground of 1.5-3.0 percent, the Company projects the following:

- There may be as many as 805,000 current patients in California
- Approximately 587,650 male patients
- Approximately 217,350 female patients
- Approximately 499,000 patients in Southern California
- Approximately 306,000 current patients in Northern California

California NORML projects that in the United States the regular medical cannabis user consumes approximately 1.5 grams of dried cannabis flower each day.

There are approximately 260,000 individuals currently living in Marin County, California. Although the population is almost equally distributed amongst Marin County's four separate legislative districts, the vast majority of the population can be found residing in a 125-square mile area located on the Eastern side of the peninsula. Marin County's Western coastland, however, is undeveloped and for the most part remains uninhabited.



The Tam Junction neighborhood located in District III is by far one of the most densely populated areas of Marin County. It is also home to the majority of District III residents. This area of Marin County features an excess of 4,000 households per square mile—a resident density that is on par with the most heavily populated neighborhoods in San Francisco.

Although much larger geographically than District III, the majority of the population residing in District IV continues to follow the same population trends that have been demonstrated by the remainder of Marin County. That is, the majority of the population of District IV is located on the Eastern peninsula, well within a 10-mile radius of the Tam Junction area. Given the traffic patterns of the existing transportation infrastructure, there is a high likelihood that qualifying patients residing in District IV will frequent a dispensary located in the Tam Junction area of District III.

Because of Tam Junction's resident density and centralized location—as well as its proximity to the most populated areas of District IV—Urban Hills estimates to be serving a qualifying patient base of approximately 1,515-3,030 qualifying individuals. Based on projections provided by Green Rush Consulting and California NORML, the Company further estimates a monthly inventory requirement of:

- 2,500 - 5,000 ounces dry flower
- 35 - 70 ounces of concentrate
- 280,000 - 560,000 milligrams of cannabis concentrate in edible carriers
- 27,600 - 55,200 single, 5 milligram doses

Quantities of dry flower inventory have been determined using projections from Green Rush Consulting that estimate the Tam Junction patient base to consist of approximately 2,250 patients; each of which are expected to consume approximately 1.5 grams of dry flower per day (according to California NORML).

According to current market research, cannabis concentrates are the fastest growing product in the industry and have come to represent almost 15 percent of the overall transactions conducted in 2015. The quantity of cannabis concentrate inventory that Urban Hills will stock each 30-day period has been determined using this statistic, and the assumption that one-gram of concentrate is the equivalent to one-eighth of dry flower.

The average medical cannabis patient that relies on edible products typically consumes approximately 20mg of cannabis each day. Broken down into 5mg doses, patients take three to four doses every few hours depending on their individual condition. Urban Hills Farm's edible menu will reflect 30-40-percent of our overall inventory.

Urban Hills will also stock a selection of vapor pens, prefilled e-cartridges, topical solutions, tinctures, and sublingual products and a variety of administration devices (within the confines of the allotted space provided by Ordinance 3639 6.85.042 (H)(3)).

This projected inventory falls well within Marin County Ordinance 3639 6.85.042 (E) pertaining to the maximum amount of cannabis product allowed per qualifying patient (the equivalent of eight ounces per patient). Based on current Market Demand projections provided by Green Rush Consulting, Urban Hills will maintain an inventory that consists of approximately:

- 50-60 percent dried flower products
- 15-percent edible products of varying MG dosages
- 15-percent concentrates and extracts
- 10-percent vapor pens and the required accessories
- 5-percent topical solutions, tinctures, sublingual products and other non-edible goods
- 5-percent administration devices

Green Rush Consulting projects the California medical cannabis market to be valued at approximately \$2.5-5 billion in annual revenue. Or, 455,000 – 935,000 pounds of dried cannabis flower each year. This projection has been determined based on the following ethnographic conclusions:

- The average, regular medical cannabis user will consume approximately 5-10.5 grams of dried cannabis each week
- The average, regular medical cannabis user will spend approximately \$3105-\$6210 annually on cannabis and/or cannabis product
- Approximately 3-percent of the state’s population is actively using medical marijuana on a regular, consistent basis
- Average cost of cannabis per gram in the state of California, \$12.81

Sales and Marketing

With the guidance of a local marketing and advertising agency, Urban Hills will generate momentum in the area one month prior to opening our doors. We will build brand recognition by advertising the services the dispensary will offer to qualified medical cannabis patients. In order to gain greater visibility to prospective patients and community partners, we will have a multi-tiered marketing strategy that includes:

Marketing Materials

All written materials used to promote the dispensary will be professional and accurate. Our written material will include leaflets that contain factual information about the products and services provided. This leaflet will also contain some biographical information about our leadership team, Educational Classes, photos of products and other promotional material. Urban Hills will provide multiple educational brochures from various medical sources. There will be an area in the dispensary where health information is displayed and dispersed in the form of packets and brochures. In addition, patient information handouts will also be available in the waiting room and on the website.

There will be a number of patient-friendly brochures, videos, mailings, and other materials used to promote the dispensary. We will also optimize the power of social media to educate patients about the availability of our services.

Promotional Events

Urban Hills will hold health information workshops with the help of community organizations for eligible patients, as well as in local and public areas of interest. Our goal will be to bring new patients into the center and give them time to ask questions about all the available medicine and services.

Community Involvement

Urban Hills will be a socially responsible member of the business community. Urban Hills will, upon opening for business, reach out to and join key business events with the intention of identifying the pressing issues that have most drastically affected the business and social community of Marin County. It is our intention to help provide additional services and to initiate outreach programs that have been designed specifically to meet the unique demands of the Tam Junction neighborhood. In particular, Urban Hills will work with neighboring business establishments in order to discuss a future plan of action to reduce traffic congestion. Urban Hills will, additionally, seek to form professional networks with existing wellness organizations in an effort better understand the needs of individual residents. By working with existing business entities and

professional neighbors, Urban Hills hopes to be able mold its community involvement in a way that is most appropriate for the community of Marin County.

Keys to Success

High Standards

The Urban Hills management team will develop and maintain strong business practices and high standards including:

- Building strong relationships with local and state regulatory agencies to ensure compliance on all levels
- Adequate funding and financial support
- Professional accounting and legal services
- State and local community outreach for charitable organizations
- Vaulted storage and inventory control
- Employment standards meeting moral, ethical, and local/state guidelines
- An overall mission statement providing direction and guidance for the standards of Urban Hills, guided by Urban Hills' mission statement

Staff and Organization

- Effective training and management of staff is crucial to helping patients treat their conditions, and to the overall success of the business
- Create incentives by offering full-time staff benefit packages and living wage
- Use the Urban Hills business plan and standard operating procedures to guide management, training and hiring decisions
- Create a streamlined appointment system to minimize patients' waiting time

Operations

- Urban Hills will have a well-trained and experienced team, which is essential to maintaining a compliant, safe environment
- Facility will be designed to minimize community impact by limiting traffic flow, minimizing patient wait times and maintaining a secure facility
- Ongoing education for employees is integral to Urban Hills' operations to ensure that we will always provide accurate, updated information to our patients
- Quality controls and testing requirements for intake of medicine will maintain product standards along with product labeling to inform patients of product name, potencies and growing practices

Patients

- Focus on patient care with consultations to provide information and advice on the wide range of therapies and products available
- Educate patients on the importance of preventative care including wellness therapy
- Encourage holistic wellness plans for each patient

Marketing and Sales

- Establish a presence in the community by hosting speakers and encouraging employees to perform volunteer work and attend industry meetings and conferences
- Network to obtain referrals from other professionals, such as therapists, doctors, and specialists
- Provide discounts to veterans, low-income patients and other groups based on need

Finances

- We retain an industry-experienced CPR and an outside bookkeeping and payroll company
- Train employees in best practices for inventory and sales processes

Strategic Partners and Support

Urban Hills has established relationships with several of the pioneers and leaders of the Bay Area medical cannabis community. Our intention is to set a high bar in Marin County for this new industry, and our leadership team and board of advisors is well equipped to accomplish this goal.

We are confident that our team's combined industry knowledge, experience and resources will help us execute our strategic plan, carrying us from license acquisition and build out to the training and execution of our operations plans.

Urban Hills will also be circumspect in choosing the organizations we are affiliated with, including the suppliers of our medical cannabis products and the healing services we will offer.

Through years of industry experience our partners and alliances have grown throughout the region and the state. Urban Hills is a member of NCIA (National Cannabis Industry Association), which advocates for National regulations of the cannabis industry. On a state level, Urban Hills is also a member of CCIA (California Cannabis Industry Association), and California Growers' Association, both of which work with state legislators and regulators to implement the Medical Cannabis Regulation and Safety Act.

Within the state we have numerous allies and relationships that will be invaluable resources moving forward, such as Emerald Opportunities, a leading staffing agency in the industry, and Oaksterdam University for networking with industry professionals.

Locally, we have partnered with Magnolia Wellness in Oakland, to establish the Compassionate Care Program to provide free medications to those unable to afford relief from illness such as cancer, MS, or AIDS. The local relations go into other local businesses as well, including Bohemian Brothers LLC, which is a branding and management company for the cannabis industry, and OG Tea company from Sonoma California, which has developed Vegan, Organic, Microbial based fertilizer for cannabis production. Reaching into Humboldt County we have alliances and relationships with The Cannavise Group LLC, which is a top-tier

Cannabis consulting group that specializes in business development, cultivation and production. Our Alliances and Partners Include:

- NCIA/CCIA
- Oaksterdam University
- Emerald Opportunities
- Magnolia Wellness
- Liana LTD Consulting
- Bohemian Brothers LLC
- OG Tea Company
- The Cannavise Group LLC
- Green Rush Consulting

Urban Hills has developed a number of strategic partners in Northern California that are compliant with local cannabis regulations and are preparing for state licensing under MMRSA.

While waiting for licensing approval in Marin, the Urban Hills facility will be available to the community for meeting space for educational seminars.

Once licensing is acquired Urban Hills will execute as follows:

1. Initiate employee recruitment and training
2. Pull permit for construction of Phase 1 plan
3. Maintain delivery service through strategic partners for patient needs and expand to local market (regulation permitting)
4. Begin local outreach and social marketing for opening
5. Update signage in accordance to Marin Code
6. Increase product intake in preparation for dispensary opening
7. Invite local officials prior to opening day for a walk through

Products and Services

Urban Hills is committed to providing high quality and effective medications for its patients, and this begins with implementing the highest standards in product procurement and testing.

Each batch of cannabis product offered by Urban Hills will be laboratory tested. All results will be made available for patient review. The testing and labeling will conform to the requirements of the MCRSA, which includes information on the levels of THC, CBD, pathogens or contaminants, and the methods and products used to produce each product. This will be an excellent tool to educate patients, by providing them with knowledge and the understanding of how their medicine was produced.

There are several reputable testing facilities operating in the Bay Area, such as Steep Hill laboratories and SC Labs. When state licensing begins in 2018, Urban Hills will become affiliated with licensed distributors and labs, which will be integral to the compliance process.

As Urban Hills grows and more patients join our collective, we will be evaluating and analyzing our product line with the goal of offering patients the most effective and targeted therapies for their specific conditions. Providing a multitude of effective strains will allow us to target each patient's medical needs, budget and flavor preferences. We will offer different price points to meet the budget of all patients.

Urban Hills has three primary competitive advantages as it moves ahead in the medical cannabis marketplace: industry experience, first to market, and established care programs:

- **Industry Experience and Organics** -The founders of Urban Hills have a combined experience of more than two decades in the cannabis industry. Our team consists of current officers of an operating dispensary who will provide valuable industry operational experience. Urban Hills' founders have worked closely with the industry leaders on all levels of cultivation and processing. These relationships range from geneticist, industry organic fertilizers to globally recognized dispensaries.
- **First-to-Market** - Urban Hills will benefit by establishing a strong presence and quality reputation throughout Marin County. Developing and nurturing our strategic relationships early on will put us in an excellent position to succeed over the long term.
- **Current Compassion Program** - Urban Hills has teamed up with a Bay Area dispensary to partner on a Compassion Program designed to service the needs of the patients who cannot afford cannabis medications. The dispensary's current program already provides medicine to over 150 qualifying patients with Cancer, MS, and AIDS. Urban Hills will help expand this already-proven program. All medicines are donated to the qualifying patients who have established a financial need for free or subsidized medicine. This program is at the heart of Urban Hills as our intention is to provide relief through natural remedies.

For all qualified patients who visit the dispensary, Urban Hills will offer the following products and services:

Modalities:

Yoga
Acupuncture
Massage therapy
Meditation

Education:

Nutrition
Diabetes
Hypertension
Depression
Pain Management
Stress Management
Understanding Your Medicine Basics

Products:

Flowers

- High CBD Flower
- Indica Flowers
- Sativa Flowers
- Hybrids

Concentrates

- Tinctures
- Oils
- Concentrates

Topicals

- Ointments
- Lotions
- Salves
- Balms

Administering Tools

- Vaporizers
- Water pipes
- Rolling Papers

Financial Projections

Financial support and planning are two of the most important keys to any new business' success, and Urban Hills and its advisors have carefully planned to sufficiently fund all stages of project development.

Urban Hills has established relationships with individuals and companies who have the ability to not only will supply the initial capital needs, but have the ability to raise funds for growth and excellence. By working with the financial advisors of the advisory board, Urban Hills will have the ability to effectively raise capital either from lending groups or investors. Up to the date of the application submission Urban Hills has already capitalized \$250,000 for the cost of legal fees, consultants and securing the building location over the past year. Urban Hills has secured a term sheet for the management company to invest \$500,000 for start up capital and will deploy funds once the county approves licensing.

The start up capital needs are derived from five major areas of estimation and needs:

1. Phase 1 of construction for remodel of building for compliance and esthetic needs
\$200,000-250,000
2. Installation and upgrades for Security Cameras, lighting and property security \$25,000-50,000
3. 3-6 months of operating capital for success to revenue \$100,000-150,000
4. Website and Technical software for compliance \$15,000-25,000
5. Inventory (provided through patients of the collective through consignment and credit lines from vendors and \$150,000 for cash purchases)

Once issued a license from Marin County, Urban Hills will mobilize \$500,000 in capitalization and begin the second round of fund raising to begin planning for phase two of construction and general evolution of the dispensary. The total capital raise for Urban Hills is \$750,000 in capitalization completed by 30 days post-license approval, and \$1.2M after one year of operations. During year one

Urban Hills would also be generating revenues from the non-profit that would be rolled into the growth and excelling operations. These funds would be used to improve inventory, decrease debt, and execute charitable programs.

	2017	2018	2019
Revenue - Flower	\$2,239,650	\$5,131,013	\$7,527,038
Revenue - Extracts/Edibles	\$1,493,100	\$3,420,675	\$5,018,025
Total Revenue	\$3,732,750	\$8,551,688	\$12,545,063
# LBs Sold	437	1,002	1,470
COGS - Flowers	\$(874,863)	\$(2,004,302)	\$(2,940,249)
COGS - Extracts/Edibles	\$(671,895)	\$(1,539,304)	\$(2,258,111)
Total COGS	\$(1,546,758)	\$(3,543,606)	\$(5,198,360)
Gross Margin	\$1,892,930	\$3,892,644	\$5,710,390
Rent	\$(174,000)	\$(179,220)	\$(184,149)
Utilities Reserve (Electricity, Water)	\$(12,000)	\$(12,000)	\$(12,000)
Security Guards (1099 contractors)	\$(138,240)	\$(138,240)	\$(138,240)
Security System	\$(3,000)	\$(3,000)	\$(3,000)
Internet/Phone	\$(4,200)	\$(4,200)	\$(4,200)
Insurance	\$(4,800)	\$(9,600)	\$(14,400)
METRC software	\$(9,600)	\$(9,600)	\$(9,600)
Accounting	\$(18,000)	\$(18,000)	\$(18,000)
Legal	\$(30,000)	\$(30,000)	\$(30,000)
Management fees Overhead	\$(180,000)	\$(185,864)	\$(191,917)
Manager	\$(36,000)	\$(36,000)	\$(36,000)
Patient Care Consultant W-2	\$(318,528)	\$(604,800)	\$(743,040)
Receptionist W-2	\$(29,520)	\$(29,520)	\$(29,520)
Payroll Taxes	\$(42,245)	\$(73,735)	\$(88,942)
Advertising	\$(30,000)	\$(30,000)	\$(30,000)
Misc.	\$(18,000)	\$(18,000)	\$(18,000)
Total Fixed Costs	\$(1,048,133)	\$(1,381,779)	\$(1,551,007)
Collective Operating Excess	\$844,797	\$2,510,866	\$4,159,383
Operating Margin	23%	29%	33%
Marin Sales Tax (8.5%)	\$(293,061)	\$(1,115,438)	\$(1,636,313)
Federal Tax impact of IRC 280E (from 280e worksheet)	\$(146,453)	\$(227,540)	\$(267,249)
Adjusted Net Income before taxes	\$405,283	\$1,167,888	\$2,255,822

Assumptions include:

- Additional 15% excise tax on all cannabis sales will begin on January 1, 2018 under proposed Proposition 64.
- Existing sales tax is 8.52%
- Flower sales are 60% of revenue; extracts/edibles are 40%
- Rent will increase 3% annually
- Security guards (1099 contractors) are \$16/hr; this cost analysis includes one guard on-site 24/7
- Patient care consultants (W-2 employees) are paid \$12/hr
- Receptionists (W-2 employees) are paid \$10/hr
- Payroll is estimated at 11%
- Corporate State & Federal taxes are not included
- Depreciation was not included as projections are cash basis
- Items such as advertising are non-deductible under IRC 280E; a separate 280E worksheet was prepared in order to generate this estimate

Construction and Development

The Urban Hills construction plan includes substantial remodeling and development in order to upgrade the property in terms of parking, flood plane issues, and green practices. The facility designs will also address local traffic mitigation. We have established a two-phased approach to this development to achieve these goals.

Phase 1

Construction to Opening would involve approximately 60 days in construction and a budget of about \$300,000. This process would begin immediately after issuance of final non-appealable license from the County. Completion of this phase will bring the dispensary to market, in compliance.

- 1) Redesign of the interior of the building
 - a.) Local permitting for Electrical, Structural and Mechanical
 - b.) Relocation of walls, wiring, plumbing to specifically fit the needs of a dispensary per plans
 - c.) Creating ADA accessible restroom, and interior security doors
 - d.) Aesthetics that are consistent with Marin County values — features such as wood lap, reclaimed wood, native plants/trees and xeriscape elements in landscaping. As much as possible, we will source re-used and renewable materials in construction, which reinforce environmental responsibility and sustainability measures.
- 2) Exterior upgrades and signage
 - a.) Sand and paint the current exterior of the building to blend beautifully with the amazing aesthetic of the natural beauty of Marin County. No flashy colors or animated effects that would distract from natural environment.
 - b.) Add signage to the front of the building, none of which will display a "POT LEAF", but rather invokes the feeling of a professional medical building with clean subdued colors
 - c.) Add front views landscaping to bring the natural look back to the area; less utilitarian, industrial
 - d.) Refresh and re-establish the parking lines to create clarity for patients and ADA patrons

- 3) Clean and structure the back of the property
 - a.) Clean up the back lot of the property
 - b.) Prepare area for short-term additional parking, patient flow, and security measures
- 4) Install Security Systems
 - a.) Interior cameras will be located at all entrances and exits, employee control areas, parking lot, and back property
 - b.) Install a direct link panic button to local police in the event of an emergency

Phase 2

The second phase of construction would include the final stretch of development for the property as part of the long-term presence of Urban Hills in Marin. This phase would commence approximately 12 months after initial operations and would not impede existing business. These upgrades are estimated to cost an additional \$250,000.

- 1) Obtain all necessary permitting for demolition of the back property and old structures
 - a.) Level most of the small out buildings remaining on the property.
 - b.) Add the correct drainage for water run-off
- 2) Add additional parking to the back lot of the property to include approximately 15 new spaces of paved parking, handicap accessibility and private passage for customers.
- 3) Install new fencing around entire property for aesthetic value and higher performing security
- 4) Pull all permits for remodel of the upstairs residence to be added as part of commercial operations, if possible.
 - a.) Add an elevator to access the upstairs
 - b.) Create an ADA compliant upstairs restroom
 - c.) Add additional cameras, alarms and security capabilities to the space
- 5) Create an additional outdoor break area for employees to include a patio for, outside eating and break periods.

The dispensing facility will have a total available space of 3,700 square feet, providing ample room for inventory, administration, and daily operations. The property includes a substantial offsite parking lot with easy access, and Urban Hills will assign Security Officers to facilitate ingress and egress. The dispensing environment is modern, while blending with the local charms of Marin County.

Dispensary

Urban Hills (UH) has a comprehensive Management and Operations Manual included with this application. The manual is broken down into step-by-step procedures, detailing how each process will be created, implemented, and supervised, in order to assure that dispensary operations are consistent with State and County laws. It includes six distinct chapters: General Operations, Inventory Management, Patient and Caregiver Registration and Recordkeeping, Point of Sale Operations, Staffing and Security.

APPENDIX A

Operations Plan

The main responsibility for management of UH falls with the Board of Directors, who will appoint and guide its senior management staff. UH's Chief Executive Officer (CEO) supervises all dispensary operations, maintaining control of all procedures. The Chief Operations Officer (COO) manages the dispensaries daily operations, ensuring that all policies in the Management and Operations Manual are implemented and supervised, and that they are updated as needed. Other senior staff supervisors include an Interim Controller and a General Manager.

As requested, several key policies are outlined below. Please refer to the Urban Hills Management and Operations Manual for a detailed and completed understanding of the supervision and implementation of each procedure.

1) Ensuring cannabis is not purchased or sold by the dispensary in a manner that would generate a profit

To assure that Urban Hills serves patient members with the highest possible level of care and compassion, it maintains a policy of Mandatory Non-profit Operations. The Chief Executive Officer (CEO) and Board of Directors are responsible for assuring that Urban Hills operates not for profit, in good standing with the State of California, at all times. The CEO, COO, and Interim Controller will develop and maintain constant due diligence in all operations, in order to verify that the organization is meeting all non profit requirements, and that all decisions are based on meeting the organizations mission, vision and values.

The CEO and Board of Directors will assure that no cultivation, distribution, or sales of medical cannabis is for profit. The CEO, with the guidance of the Interim Controller, will allocate income to ensure nonprofit use. Fund allocation will be in place to cover all operating costs, including but not limited to the costs of acquiring cannabis and medicinal products. Revenue may be reinvested in the business. Excess revenue will be donated or disbursed to community services, patient services, or local nonprofit agencies. The COO will keep detailed records regarding the disbursement of funds, for regular review by the Interim Controller.

2) Controls that will assure medical cannabis will only be dispensed to qualifying patients or caregivers

Urban Hills has a strict policy regarding Restrictions on Entry to Dispensary Department to ensure that only qualified medical marijuana patients and caregivers are permitted to enter the dispensing area. The CEO will create and implement a policy to allow only registered patients and caregivers into the dispensary room. This includes status verification at the time of registration, recheck of registration at each visit, and a system of only buzzing qualified people into the dispensary room from the reception area. The CEO, with the COO, will create a staff training program to enforce this policy, and the General Manager will make sure each responsible staff member is trained.

The UH Receptionist will verify that each person is a valid and registered member, both upon initial registration and at each visit after that. The Receptionist will permit only those legally qualified and verified as current medical marijuana patients or caregivers to enter the dispensary room. Following verification, the receptionist will grant access to dispensing area by way of electronic buzzer entry system. If the person does not have a valid patient recommendation, or are not already a valid and registered caregiver, the person will be asked to leave the reception area by the Receptionist. The person will be given information about how

to become a legal patient or caregiver, and may be provided with general medical cannabis information. Security will assist with this, providing information and escorting people out, if needed.

During each visit, Dispensary Patient Consultants will check the identification of each member at the dispensary counter, in order to re-verify the each person's status as a currently registered member. If a person is found to have an expired card, they will be escorted from the dispensary by the Dispensary Patient Consultant, and advised to get an updated card before returning. Security will assist with this, if needed.

If a person with an expired card, or if someone enters the dispensary without a valid card, and this is due to staff error on the part of the Receptionist, the Receptionist will be given a written or verbal warning about their violation of this policy. Repeat violations will be grounds for termination.

The CEO will create a guest policy, stating that all other authorized visitors will remain in the designated outside waiting or parking area. The COO will implement and supervise this policy. Security will monitor the outside waiting and parking areas to assure that guests and visitors do not create any nuisance crimes and do not present a risk for diversion of cannabis or another serious crime. If security feels threatened, they will call 911 immediately, and notify the CEO or other senior facility staff that a problem exists.

Urban Hills also has a strict policy stating No Redistribution of Cannabis Medicines Are Allowed. It is imperative that all collective members understand this rule and that staff implements specific policies to support it. The CEO 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, County or State Codes. 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.

To educate members about this policy, the COO will create training materials, including flyers, spoken script and posted signs. The COO and General Manager 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. The Receptionist 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 to it. Members will be educated about the fact that a single violation of this policy will result in immediate revocation of their membership. The General Manager 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.

Urban Hills will package all medical cannabis with a warning against redistribution. The COO, with the assistance of the General Manager and Purchasing Agent, will assure that each package of medicine at Urban Hills (UH) is labeled with a warning stating that it is not for redistribution. The General Manager and Purchasing Agent will make sure all vendors are aware of this policy, and that no direct sales occur between the Urban Hill suppliers and its members. Violations of this policy will result in immediate revocation of membership for the vendor and member.

The CEO, with the assistance of the COO, will supervise a comprehensive set of procedures to report violations of this policy, including using reporting forms and systems, training staff to watch for signs of redistribution or intent to redistribute, and teaching staff to interrupt a violation of this policy. The COO and General Manager will train staff, especially outside Security, to implement these policies, and they will provide tools for complete investigations into these matters, including reporting forms and video feed footage access.

The CEO and COO will assure that Urban Hills 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 CEO 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. The Urban Hills CEO and COO will maintain a good relationship with the Marin County Sheriff's Department. It is essential that UH be able to count on the Sheriff's Department to assist in enforcing this law, if needed, and for the Sheriff Department to be able to depend on our systems to prevent violations.

3) Controls on number of patients permitted per County Ordinance

Urban Hills has a policy setting a Limit on Member Numbers to ensure that the number of patients does not exceed County guidelines. The CEO is responsible for setting up a compliant storage system for patient records, which the COO and Office Administrator will implement. These records will include a total number of members, and if the collective reaches capacity, new member registration will be halted until space is available. The Receptionist, with assistance from the Office Administrator, will register new patients and caregivers by saving digital files and filing physical documents in order to easily achieve current patient count.

The CEO and COO will work with the County Administrator, Fire Marshall and surrounding businesses and neighbors to assure that all policies regarding capacity meet the standards of the law. The goal is to reduce any adverse impacts the collective's member visits have on our community.

The CEO, with the assistance of the COO, will set up systems to supervise that no new members are registered at the collective, if the facility is at capacity. New member registration will only begin again, as others drop off the register of active members. The Receptionist will not register any new members, if the collective is at capacity. Security will check with each person to see that they are registered members, before entry, and will deny access to the facility to any new person, if the dispensary is at capacity.

Urban Hills has a policy Discouraging Daily or Weekly Visits. The CEO will supervise and assist the COO in creating a member education program and incentive program to encourage members to monthly visits only. This will include providing all newly registered members a written document within the admittance packet that will clearly state the expectation of monthly visits. The Office Administrator will set up a digital tracking system to regulate the number of visits by date and time in order to address frequent repeat visits. The Receptionist will use a digital tracking system upon signing in each patient entering the facility. If it is noted that the member is visiting more often than requested, the Receptionist will remind the member of this guideline. Urban Hills will deny access to members who abuse this regulation.

4) Controls that will ensure access to dispensary premises is adequately monitored and restricted to pre-approved qualified patients and caregivers

Urban Hills has a policy to ensure that access to the facility is monitored, and that Membership is Limited to Patients and Caregivers. The CEO will establish and supervise these procedures to assure that each member

is a verified patient with a valid doctor's recommendation for medical marijuana from a licensed physician or is the designated caregiver of a valid patient. The COO will implement this policy and to supervise the staff responsible for assuring adherence to it.

For patient members, the policy is that each member must have either a county-approved medical marijuana card, a copy of their original doctor's note or an equivalent card issued by their licensed physician. Before a new member will be allowed to access the dispensary, the Receptionist will call the doctor's office or will use their online verification system to check that the recommendation is valid. The Receptionist will also verify that the doctor is licensed in California by checking the Medical Board's records. Members will only be allowed to complete their registration, and enter the dispensary, after both of these qualifications are met.

For caregiver members, the policy is that the patient member they represent must be with them on the first visit, in order to verify that each caregiver is an actively giving care, and is qualified to purchase medicine for the patient member they represent. The patient must register first, and be verified fully, and then they can complete an Urban Hills Caregiver Designation form for their caregiver. After this, their designated caregiver will be able to acquire medicine for the patient they assist. Patients can revoke the rights of their caregiver at any time, by phone, email or in writing, and Urban Hills will immediately revoke their access to the facility.

The General Manager, with the assistance of the COO and Office Administrator, will ensure that all staff are trained and have information about these procedures and the state regulations, and that they have the knowledge to identify and locate patient name and dates verifying a current, state-approved medical marijuana recommendation, signed and stamped by a physician licensed in the State of California. The General Manager will ensure that all staff are trained to verify the licenses of each doctor, using the State Medical Board's website.

For recordkeeping, the dispensary will maintain records of all patients and caregivers using only the identification 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 need for medical cannabis. The CEO will assure this policy is in place, and the COO will implement this, with the assistance of the Office Administrator and Receptionist.

Security Staff will screen people at the front door, checking that each person is carrying a doctor's recommendation or is a designated caregiver, before they enter the building. If any person arrives without a doctor's note or is not a designated caregiver, Security Staff will politely inform the person that they are unable to enter the facility. Urban Hills will provide information about medical marijuana, the laws, and about talking to their own doctors, if requested. The Receptionist will bring out an information packet for anyone who is interested in this information.

Urban Hills has a policy setting Age Limits on Membership to ensure that no patient under the age of 18 years is permitted inside the premises, unless accompanied by parent or legal guardian. The CEO will create procedures to carefully screen every person who enters the facility. This will include making sure that only patients and caregivers enter the facility. The COO will implement this policy by developing a screening process for front door security, with a secondary screening process at registration, and will create a training process for staff. The General Manager will train staff and make sure that Receptionists have all information necessary to fully screen members.

Security Staff will check all member IDs and doctor's recommendations at the door, in order to verify that people are of age and qualified for membership. This is a pre-screening only, as the receptionist will verify the validity of all ID's and membership cards. Security Staff will check the ID of anyone under the age of 18's parent or guardian, before granting access to the reception area. Security Staff will deny access to the reception area to anyone who does not have a doctor's recommendation, who is not over 18, unless accompanied by a parent or guardian, or who is under 18, but is the caregiver for the parent or guardian. Anyone not qualified to enter the dispensary will be kindly asked to leave immediately, and offered the opportunity to return, if and when properly qualified.

Urban Hills has an Entering the Facility policy to assure that only pre-approved patients and caregivers are allowed to enter the dispensary room from the lobby. Upon verification of membership, the Receptionist will permit qualified patients and caregivers into the dispensing area, via a "buzz-in" electronic entry system. Security staff will serve as a secondary measure of ensuring only qualified and approved members are permitted into the dispensing area. They will stop any person attempting to enter without authorization, or enter surreptitiously with a registered member.

The General Manager will supervise the Receptionists to make sure that patient files are updated in keeping with this policy. After greeting the patient, asking for their ID, and looking up their name in the Point of Sale tracking system, if the patient's recommendation has expired, the Receptionist will inform the patient that they need to renew their recommendation with their doctor. If they need a doctor, the Receptionist will provide a list of doctors where they can make an appointment for a recommendation. When the patient returns with their updated recommendation, the Receptionist will contact the doctor's office via telephone or internet to verify it. The Receptionist will update the tracking system with the new expiration date for the patient. If the doctor is unknown, the Receptionist will verify their license at the California Medical Board website, before granting a membership renewal.

5) Method for ensuring that a qualified patient's physician is not recommending cannabis for other than medically appropriate reasons.

Urban Hills has a policy to Assure the Integrity of Doctor Recommendations presented by patients and caregivers, in keeping with state and local law. The CEO, with the assistance of the COO, 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. The Urban Hills Patient Membership Agreement, to be signed by all new and renewing dispensary members, will include checkboxes for these phrases:

- a. "I have a medical reason for using cannabis."
- b. "My recommending physician has taken responsibility for an aspect of my medical care, treatment, diagnosis, counseling, or referral."
- c. "My recommending physician conducted a medical examination before issuing my recommendation."

The Receptionist is responsible for ensuring each box is checked, and that the physician's medical license is valid, before granting membership to any person.

The COO, with assistance from the General Manager, 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. The Receptionist will report to the General Manager about any potentially noncompliant issues. This will then be reported to the CEO and COO for review. This includes:

- a. 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).
- b. Physicians who may be recommending medical cannabis without a medical reason for the recommendation, based on statements made by a patient.
- c. Physicians who offer remuneration to the dispensary in exchange for referrals.

The Office Administrator will review on a monthly basis the number of physician recommendations presented from all doctors, flagging ones that look suspicious. These will be reported to the CEO and COO for investigating any that are excessive in number. The CEO and COO will investigate any reports from Receptionist or Dispensary Patient Consultants about doctors who may not be conducting a good faith prior exam or are issuing recommendations without a medical reason. The CEO and COO will determine whether or not a physician's recommendation will be accepted at the dispensary and communicating this information to the Receptionist. If a physician's recommendation is no longer accepted, the Receptionist will inform the member that they must secure a new recommendation in order to maintain their membership status.

Urban Hills has a policy stating No Onsite Physicians Evaluations. To meet the rules set forth by the County and the State Medical Board, the CEO and COO will assure the dispensary never has a physician onsite to evaluate patients and provide recommendations for medical cannabis. Physicians may be onsite for other purposes.

Delivery Service

The Urban Hills delivery service will be available to qualified patients to provide safe, convenient access to medicine in Marin while mitigating the amount of traffic on the roads near the dispensary. We project that a delivery service would reduce the number of vehicles on the road by 25-50 cars per day to start, and the service would grow at a steady rate.

Urban Hills will begin its delivery operations with one electric car and adding more cars as the patient base grows. Urban Hills plans to sign a lease with a local car dealership for a compact, unmarked vehicle for safe transportation of medical cannabis products.

Sign up and verification

Urban Hills will verify each prospective patient according to UH verification policies (detailed in Standard Operating Procedures), which align with state and local laws. Each patient while signing up to become a member will be notified of our delivery service availability, benefits and programs.

A new patient will be able to be verified either within the Urban Hills facility or be verified through verification technologies employed by Urban Hills such as Meadow (delivery and verification software). Once UH has received all necessary documents and the patient has been verified through our policies, they then will be eligible for delivery with the Marin service area.

Online Orders

Patients will have the ability to log onto the Urban Hills website or one of our third party affiliates such as Meadow for product selection. On the website patients will be able to inquire about available products and receive educational information to help them make informed decisions on the available medicine. Products listed will be categorized in sections based on flowers, tinctures, edibles, concentrates oils and extracts. Within these categories patients can find suggested ailment relief recommendations, product name, strain name, methods of production, potency, and laboratory results. There will always be a contact number for patients to be able to contact the Urban Hills staff with any questions regarding the available products.

All delivery products ordered in advance or during off-peak hours will receive a discount to help promote the UH delivery service. Urban Hills will provide other incentives to encourage patients to use its delivery service, such as discounts on orders and coupons for new products. As more patients use the delivery service, it will reduce the flow of traffic in and around the dispensary location and create efficiencies throughout the business operations.

Shift preparation

The driver is to arrive at UH at the beginning of opening hours to prepare for his/her route. Through the online ordering process or an online ordering service such as Meadow, an online ordering service, the employee will prepare the requested products within the transport container. Each order is to include a receipt and verified payment method. The shift driver will prepare his/her route to be as efficient as possible, eliminating back tracking and excessive driving. The order preparation will be no larger than state allowed per individual per patient [REDACTED] per route. All delivery locations will be documented on the route log and the products that are being delivered to each location. The delivery locations will have an estimated time of arrival on the route sheet.

Upon preparation of the patients' products and the delivery route the shift manager will verify all transaction and route. Once there has been verification the driver is escorted to his/her vehicle out the back door by staff security. The driver is to be discrete as possible as to not draw any attention to himself or the vehicle. The shift manager can verify a driver's location through GPS tracking and verify the progress being made on the ETA of each delivery. At the request of the MPD the driver may be located at any point within the route.

On Board Inventory

Prior to departing for a delivery, all products must be accounted for in the seed to sale inventory tracking system. The orders and their corresponding receipts will be signed off by the delivery shift manager to ensure that all products leaving the building match the orders placed and have been correctly logged into the system. At this time the shift manager will not only document that the orders are correct, but will review the route based on addresses and delivery times to ensure the best possible route is taken. This will also ensure that the shift manager has complete knowledge and documentation of the intended routes and timelines. The routes, times, and delivery manifests for each driver will be kept in a secure location where the only access is permitted by the CEO, COO, or shift manager unless requested by local authorities such as MPD.

The transported inventory is not to exceed state and local limits for a medical cannabis patient of the State of California. The route driver is not to transport more than a total value [REDACTED] at any one time to reduce the desire for robbery or theft. Routes which may have a total value of over [REDACTED] or with anticipated cash payments of over [REDACTED] must be broken into two separate routes that divide the value into two transports not allowing this much value to be in one place at a time.

All products being transported must be further than arm's reach of the delivery driver during deliveries. An enclosed, non-marked container (i.e. security box) must be used for storage within the vehicle. The driver must have on board at all times a valid driver's license, insurance, and supporting documents from the dispensary.

The Delivery

Upon arrival, the patient has already been notified and verified through text and/or email 10-15 minutes prior to the driver showing up. All transactions must take place in a private residence. There will be no transactions to take place through the window of the car, to a car, or outside of the car in commercial or public areas. Urban Hills will verify the identification of the patient and ensure it matches all information provided by the verification process.

Urban Hills will encourage patients to make credit or debit transactions, processed at the time of the order. In the event of a cash transaction the driver will receive payment at the time of the providing of the order to the patient and stored in a secure locked bank bag for transportation. After a patient receives an order, the driver will provide a receipt for his or her records.

The driver or agent of UH may only provide the patient with the exact order documented and paid for within our data and record keeping. No additional sales may be made onsite without another order placed through the seed to sale tracking system, then re-delivered at another scheduled time.

Packaging

All products must be clearly labeled and in their original packaging upon delivery. Patients will be able to verify that their products are sealed and have not been tampered with. Whether the delivery is a single product or multiple products, the purchase must be delivered in a opaque bag. Inside or attached to the opaque bag will be a receipt of products ordered and all products labeled according to state, local and company policies.

Payment

Urban Hills' preferred means of payment will be credit or debit card in order to limit the amount of cash either on the road or at the dispensary. Credit and debit transactions will be taken through the seed to sale software or through the established delivery service software for verification and payments. The driver's bank bag is not to house more than [REDACTED] at any one time. In the event of cash transactions building up over the amount of [REDACTED] the driver will notify his/her shift manager at which time the driver will be directed to make a cash deposit or make a cash drop to the shift manager at the dispensary location for accounting and to be including with the daily business deposits.

Specialized Software

Urban Hills will employ the use of the most advanced technologies available to the medical cannabis industry. Along with the use of our seed to sale inventory and point of sale software, UH will utilize delivery service programs such as Meadow for sales and verification of patients. As the fleet expands and the need to track the location of multiple vehicle locations proves to be necessary, UH will add to our software and technologies a fleet management program. With fleet management software the dispatcher would then be able to locate, update real time, and change route for the drivers. This method would be employed once the fleet becomes large enough to justify the cost, as with only one delivery vehicle the tracking methods are more easily managed. In a single delivery car event, the location of each delivery is manually logged as to its location and estimated time of delivery. The driver will update the designated manager for his/her shift as to the progress of the projected route, and times as each delivery is completed and timelines completed. Any deviations from the intended route or planned delivery must be documented and noted in the daily route log. Also, by utilizing current technologies already available to us such as GPS tracking, the shift manager will be able to locate the driver at any time. Between the GPS tracking and the manual logged route the shift manager will be able to see where a driver is and notice if there has been a deviation from the intended route or delivery plan.

Emergency Protocols

While we intend to use the safest means possible in the delivery of our products, we must outlay the processes in the event of unforeseen incidents and have the proper documentation as to avoid further incidents.

Each driver must have a clean driving record. A history of accidents or repeated moving violations will not qualify an employee for the delivery team. No driver is permitted to possess any sort of weapon on his or her person or within the company vehicle at any time. Any breach of these clear rules will be cause for immediate termination. The word "weapon" for these purposes will be described as anything possessed that could be construed for the use of causing someone bodily harm. Examples of this would be: Guns, knives, pepper sprays, Tasers, or baseball bats.

In the event of robbery while in or out of the vehicle, the employee is instructed to [REDACTED]

[REDACTED] Immediately following the incident the employee is to remain at the incident, unless the location does not feel safe, and contact 911 for assistance. After contacting 911, the UH driver is to contact his/her shift manager and notify them of the incident and location for documentation. Taking full note of the police report and shift report this information is to be used to improve routes and or practices to avoid any further similar situation.

If a delivery location appears to be unsafe in any manner, the driver is to report to the shift manager as to assess whether to proceed or cancel the delivery to avoid any unsafe situations for both the patient and the driver. No delivery shall take precedence over the safety of the patient, driver or the public.

In the event of traffic violation or an accident the employee of UH is to follow all state and local procedures for documentation of the incident. The UH employee is to obtain a report from the local PD and report all incidents to shift manager.

End of Shift

Delivery hours will begin one hour after operating hours begin and end one hour before operating hours close as to limit the amount of traffic to and from the dispensary location. This allows for the driver to arrive in the morning to prepare orders and load the vehicle with the proper security on staff, and to return during hours in which security is present. Prior to returning to the Urban Hills dispensary the driver is to provide notice by text or phone in order to alert a shift guard for escort from the vehicle to the building. The driver is to return with any undelivered products, route log, and cash bag for reconciliation. The shift manager will reconcile the driver's deliveries, with the driver route, and confirm receipt of payment for each delivery.

Delivery Incentives

Urban Hills will promote delivery to each of its patients, as they become members. It is in the community's and our benefit to reduce traffic in and around the dispensary location. Therefore, promotions for delivery orders made 24 hour in advance will receive the largest discounts to promote full routes for our drivers and efficiencies for the dispensary. All deliveries will receive discounts and incentives to promote the use of the delivery services. The higher the traffic levels are at the requested time for delivery, the less incentives a patient might receive. We not only want to promote less traffic at the Urban Hills location, but we also want to improve traffic throughout the community. By encouraging patients to use off-peak hours, we improve our delivery times and do not add to the heavy traffic times.

APPENDIX B Public Benefits Plan

Urban Hills (UH) is a nonprofit mutual benefit corporation, dedicated to serving the Marin qualified patient community. It operates under the guidance of state and local laws to provide pure cannabis medicines and adjunct services to registered members. UH's goal is to exceed the needs of each person by providing the finest cannabis medicines and meaningful social services, with a kind and professional staff to educate and enhance each visit.

1) Whether the dispensary will be locally owned where more than 50% of the ownership interest is by a resident living in the County of Marin;

No. Please see Management Team for more information on the ownership.

While the principals are not Marin residents, Urban Hills' Advisory Committee includes Dr. Larry Bedard, Board Member of Marin Healthcare District, and will include two members of the local community to advise the Board of Directors regarding local considerations to ensure that Urban Hills understands well and addresses the needs and concerns of the community. Additionally, Urban Hills has employed a Marin County architecture firm, Marin County resident attorney, and will seek other opportunities to include Marin County businesses and professionals during the build out and operations phases, in addition to hiring local staff.

2) Whether the dispensary will adhere to compensation policies that are consistent with the County's Living Wage Ordinance (Marin County Code Chapter 2.50) for staff and employees;

Yes.

3) Whether the dispensary agrees not to interfere with employees' decisions to unionize, thereby being a "card check neutral" facility;

UH has a policy of Noninterference with Union Organizing. Our management will at no time interfere with union organizing. Urban Hills will make sure that both interested unions and our employees are aware that the dispensary's management will not interfere with employees' decisions to unionize.

The Chief Executive Officer (CEO), with the assistance of the Chief Operations Officer (COO), will supervise a policy of noninterference with union organizing, including a "card check" agreement under which the dispensary pledges to recognize a union automatically if a certain number of signed union authorization cards are collected. The COO will implement a policy giving union representatives permission to come on company property during work hours for the purpose of collecting union authorization cards, in keeping with policies for non-patient visitors to the facility. The General Manager will oversee any union representative visiting the site in accordance with non-patient visitor policy. The COO will develop and supervise a policy and instruct management staff that supervisors are prohibited from saying anything negative about the union or unionization during an organizing drive. The COO will also instruct management staff and security officers that union pickets or protests are to be permitted on dispensary property.

4) Whether the dispensary will implement a community relations program with staff who are assigned as points of contact to address neighborhood concerns, and if so, details of such a program;

UH has a policy designating an On-site Community Relations Staff Person. This is to provide the County Administrator, the dispensary neighbors, and the community at-large with a contact person, so that all complaints first come directly to the dispensary. The CEO will provide the County Administrator with the name, phone number and facsimile number of an On-site Community Relations Staff Person, to whom anyone could provide notice if there are operating problems associated with the dispensary. This will be a senior staff member at Urban Hills, with the training to manage problems with alacrity.

The CEO, COO and the On-site 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 County. The On-site Community Relations Staff Member will visit all neighbors, within a radius to be determined by the CEO and City Administrator, to meet them and inform them about the dispensary's policies, and to make sure they have contact information for the On-site Community Relations Staff Member, including phone, fax, and email. In addition, information about the dispensary will be mailed to each neighbor.

Security staff, the receptionist, or any other staff who is the point person for receiving a visit from a concerned neighbor will be friendly and accommodating. They will take down all the details of the complaint, and give this report to the On-site Community Relations Staff Member. If the situation requires immediate attention, they will be phoned and the information relayed. If not, the information will be recorded in written form for them. This information will include the name of the person, the date, the time, their phone and email address, and a detailed report on the situation.

The On-site Community Relations Staff Member will respond to each concern or complaint in a timely manner. All responses will be tracked and filed with the original complaint, and the resolution will be noted.

UH has a Nuisance Prevention policy to protect the safety of the dispensary and its surrounding neighborhood. The Chief Executive Officer (CEO) is responsible for creating, implementing, and updating nuisance prevention policies and procedures. These will 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.

The CEO will use this definition of nuisance, from the Marin County regulations: "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."

The outside Security Officers have primarily responsibility for implementing the nuisance prevention plan. The Security Officer posted at the front of the facility's parking lot must be vigilant in observing the street and nearby businesses for nuisance behaviors. Security Officers will carefully observe members as they pull into the lot, park and exit the lot again. No nuisance behaviors will be allowed during these times, either from the members or by any guest left waiting in the car during a visit.

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

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

Small, non-recurring 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 Sheriff, the membership of the person will be immediately revoked. The CEO or their designee is responsible for assuring the person is stricken from the member roll.

5) Whether the dispensary will implement an educational awareness program that explains the benefits and potential abuses of cannabis, and to provide information and/or referrals to substance use disorder education, prevention, and treatment programs, and if so, details of such a program;

Urban Hills has a policy to Provide Education and Referrals on the Benefits and Potential Abuses of Cannabis. The goal is to implement an educational awareness program for patients, caregivers, staff and the community that explains the benefits and potential abuses of cannabis and to provide information and/or referrals to substance use disorder education, prevention, and treatment programs.

The CEO and COO, in coordination with the General Manager and outside experts and vendors, will develop, implement and publicize educational programs and groups for patients, caregivers and staff. This will include information about the benefits and potential abuses of cannabis, the signs of substance abuse to look for in oneself and others, and the proper intervention methods for substance abuse disorders.

The CEO, with the assistance of the COO, will identify key community programs or agencies to refer people to for substance use disorder education, prevention, and treatment programs. The General Manager, 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 Receptionist 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 will be managed by the COO or by the outside Human Resources agent.

Once notified of an issue, the General Manager 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. If encouraged by the member, the General Manager or COO will maintain a dialog with the person, communicating with the patient about the results of their cannabis therapies and concerns about their use of cannabis and other substances.

The COO or General Manager will refer patients and caregivers to dispensary-led educational programs and groups, and to outside substance use disorder education, prevention, and treatment programs. 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.

6) Whether the dispensary will seek and maintain certification as a Marin County Green Business;

It is Urban Hill's policy to Seek and Maintain Certification as a Green Business. The goal of this policy is to demonstrate continuous compliance with applicable environmental regulations. This includes conserving energy, water, and other materials and implementing sound environmental practices to prevent pollution and waste generation. The CEO will renew the Green Business

Certification as needed in a timely and efficient manner, striving to exceed compliance whenever possible.

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. The CEO, with the assistance of the COO, will complete the County Green Business Application and secure certification.

The COO will supervise the sourcing and purchase of necessary equipment and systems to meet certification requirements (e.g. energy efficient appliances). 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. The COO will identify ways to conserve resources and to prevent pollution and will implement policies that do so. UH will use the County Green Business checklist to select and record measures to conserve water and energy, prevent pollution and reduce waste.

The COO will supervise development of protocols for compliance with Green Business policies for inclusion in member and employee handbooks. The General Manager 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. UH will publicize and promote the policy on the UH website and on social media, and will create flyers and education programs about Green Business policies for staff, members, and the community.

The CEO, with the assistance of the COO, 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. The CEO, with the assistance of the COO and On-site Community Relations Staff Member, will work cooperatively with the community and neighboring businesses to implement sound environmental policies.

7) Whether the dispensary will offer a reduced pricing plan for qualified low income patients and military veterans who are Marin County residents, and if so, the level of subsidy that will be provided to the qualified patients; and

UH will implement management of a community benefits plan, with its policy to Provide Wellness Services to Members. The CEO, in coordination with the COO, will develop and implement a compassion program for indigent, seriously ill or veteran patients. Urban Hills will publicize these program benefits, such free or reduced-price cannabis medicines and/or food bank packaged meals, with the assistance of Reception and the General Manager.

Urban Hills will aim to use 2% of its gross income for free medications to qualifying patients, especially for Marin County residents. Qualifying for this will be determined within the parameters of our Compassionate Care Program for cancer, MS, Crohn's, HIV patients and other members with critical

illnesses. Additionally, patients may qualify for low-income senior and veterans programs to receive a minimum discount of 10%. This program will be reviewed annually, with membership renewal and doctor recommendation verification. UH will host special promotions on holidays such as Veterans Day or for events like Breast Cancer Awareness Day. UH will offer larger discounts to members those days, and will provide portions of revenues to corresponding charitable organizations.

The COO will establish criteria for patient eligibility. This will include seniors, qualified low-income patients, and military veterans who are residents of Marin County. The COO and Office Administrator will develop a registration form and procedure for verifying a patient's eligibility for the program and on training staff on signing patients up for the program. The General Manager will train all Receptionists, who will then register applicants for the program.

The COO will establish and publicize day(s) of the week and times when patients may participate in these programs. This will be printed on flyers, signs, and the Receptionist will tell each member about this program. The UH website will contain information about the program and how to register.

The COO will create programs to gather input from patients on their needs, and adjust the program as needed. The General Manager, with the assistance of the Receptionist and Dispensary Patient Consultants, will gather this data. The COO, in coordination with the General Manager—and after gathering input from dispensary members—will develop, implement and publicize programs to offer skills building and wellness services for patients, in general, such as:

- Massage therapy, Chiropractic therapy, Nutritional Counseling, and Chinese Medicine 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
- Provision of cannabis medicines for a discounted reimbursement to qualified members

8) Whether the dispensary will implement the following minimum labeling and warning requirements from the State's Medical Marijuana Regulation Safety Act:

(a) labeling all medical cannabis product and placing them in a tamper-evident package; (b) including source and date of manufacture and cultivation prominently displayed and in a clear and legible font; (c) listing pharmacologically active ingredients including tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content; (d) using generic food names to describe edible medical cannabis products; (e) referencing to "medical use only and Schedule I Controlled Substance" on packages; (f) identifying the net weight of the medical cannabis for packages containing only dried flower; (g) adding warnings if nuts or other known allergens are used; (h) adding warnings about the medicine's intoxicating effects; and (i) ensuring that packages and labels use designs that are not attractive to children.

Urban Hills has a strict policy on the Labeling of Marijuana Products to the standards of the State's Medical Marijuana Regulation Safety Act. All requirements (a) through (i) above are addressed and met in this policy. The CEO, with the assistance of the COO, will assure all marijuana products are labeled in accordance with state law in a way that is clear, concise and accurate, and maximizes efficiency and inventory control. The following is a step-by-step outline of Urban Hill's procedures for labeling.

1. Labeling packages of cannabis flowers

The Purchasing Agent will oversee the weighing of cannabis flowers and package it into 1/8 ounce or 1-gram tamper-evident packages, or into bags sealed so that they are tamper evident. Dispensary Patient Consultants will assist with packaging and labeling all products, and the General Manager is responsible for making sure each product is packaged and labeled to this standard, before reaching the dispensary floor. 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, strain name and date of harvest
- The net weight of the cannabis in the package
- 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."
- 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

The Purchasing Agent will oversee the weighing of cannabis waxes and package it 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, strain name and date of manufacture and cultivation
- The net weight of the cannabis in the package
- 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."
- 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. To label packages of cannabis topical medicines

The Purchasing Agent will oversee the weighing of cannabis shatters and package it in envelopes, and insert them into bags sealed so that they are tamper evident. The 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, strain name and date of manufacture
- The net weight of the cannabis in the package
- 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."
- 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

4. To label packages of cannabis edible products

The Manufacturing or Packaging Manager 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 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) 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



MANAGEMENT AND OPERATIONS MANUAL

Urban Hills

Marin County Medical Cannabis Dispensary Application
230 Shoreline Highway - Mill Valley - California - 94941

Dustin Pebbles
Crystal Pebbles

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URBAN HILLS 00179

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SECTION 1 General Operations

Mandatory Not-for-profit Purchase and Sale of Medical Cannabis

Marin County Code Chapter 6.85.050, Section 13a

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure that Urban Hills serves patient members with the highest level of care and compassion

Definitions:

None

Scope:

Administrative Offices

Responsibilities

Chief Executive Officer (CEO) - to establish and supervise this not-for-profit mandate

Detailed Procedures:

1. No cultivation, distribution, purchase, or sales of medical cannabis for profit
 - a. The CEO will assure that no cultivation, distribution, purchase, or sales of medical cannabis is for profit.

Hours of Operations

Marin County Code Chapter 6.85.043, Section C

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to establish and enforce hours of operation

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

Security - to secure the outside of the facility, before and after hours of operations

Detailed Procedures:**1. Maintaining proper hours of operation**

- a. The CEO and COO are responsible for enforcing hours of operation for the facility.
- b. Public hours for Urban Hills are 10 AM - 8:30 PM.
- c. Staff will arrive at 9 AM and leave at 9 PM, to manage opening and closing procedures.

2. Turning away people who arrive early or late

- a. While present, security is 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, security will inform them that the facility is closed. As it is our goal to have members return during normal hours, this communication will be friendly, and security will verbally inform them of normal hours of operations.
- c. Security will be alert for people arriving during these closed hours, as they pose an extra security risk. If any danger is sensed, security will immediately retreat, use their radio to call for help, and, if warranted, push a 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 nuisance, if they arrive a few minutes early.

Display of License

Marin County Code Chapter 6.85.042, Section R

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to implement a policy assuring that this license is properly displayed at all times

Chief Operations Officer (COO) - to point of salet all signs properly, including this license

General Manager (GM) - to assure that all required repairs and replacements take place

Receptionist - to assure that all mandated signs, including this license, are point of saleted properly, and to report any problems to a supervisor

Detailed Procedures:

1. Posting the dispensary license

- a. The CEO, with the assistance of the COO, will assure that the dispensary displays at all times the medical cannabis dispensary license issued pursuant to the laws of Marin County.
- b. The CEO will point of salet this license in a conspicuous place, so that it is readily seen by anyone entering the dispensary.
- c. The receptionist is responsible for reporting to the GM any damage or loss related to all mandated signs, including this license.
- d. In the event of damage or loss to mandated signs, including this license, the GM will immediately remedy the situation.

Exterior Signs

Marin County Code Chapter 6.85.042, Section, J

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

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

Definitions:

None

Scope:

Outside facility

Responsibilities:

Chief Executive Officer (CEO) - to implement a policy assuring that all mandated and other signs are properly point of saleted at all times

Chief Operations Officer (COO) - to assure that all mandated and other outside signs are point of saleted in a visible and safe manners

General Manager (GM) - to assure that all required repairs and replacements take place

Security - to assure that all mandated signs, including this license, are point of saleted properly, and to report any problems to a supervisor

Detailed Procedures:

1. Mandated exterior signs

- a. The CEO, with the assistance of the COO, will assure that the entrance to the dispensary is clearly and legibly point of saleted with a notice indicating that persons under the age of 18 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 CEO will assure that the building entrance to a dispensary is clearly and legibly point of saleted with a notice indicating that smoking, ingesting or consuming cannabis on the premises or in the vicinity of the dispensary is prohibited.

2. Address identification sign
 - a. The CEO will assure that the premise’s address identification sign complies with the county code and with the fire department’s illuminated address signs bulletin.

3. Business identification signage
 - a. The CEO will assure that all business identification signage is approved in accordance with the county’s sign permitting process and any other applicable ordinances.
 - b. The CEO 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 CEO will assure that no sign on the premises obstructs the entrance or the windows.

5. Loss or damage of signage
 - a. Security has the primary responsibility for reporting any loss or damage to exterior signs to the GM, who will immediately remedy the situation.

Maintaining Proper Indoor and Outdoor Lighting

Marin County Code Chapter 6.85.042, Section 21

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To provide safety and security to our staff, members, and community

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to design and implement a lighting policy that assures all internal and external lights are properly located and in working order at all times

Chief Operations Officer (COO) - to supervise the lighting plan, managing all repairs that require outside contractors and assuring that staff keeps the lighting functioning in each individual workspace

General Manager (GM) - to assure that all required repairs and replacements take place

Security - to assure that all outside lighting is in working order, to fix any missing light bulbs that can be

easily replaced, and to report any problems that require repairs to a supervisor or to the GM

Staff - to replace any bulbs that are missing or burned out in their work area, or to notify their supervisor or the GM if repairs are needed

Detailed Procedures:

1. Management of a lighting plan

- a. The CEO is responsible for maintaining a lighting plan for the exterior of the premises and for creating interior lighting levels that will provide adequate security lighting for the dispensary.
- b. Security is responsible for notifying the GM if any external lighting issues occur, including the need for repairs or notification of the need for additional lighting for safety purpoint of sales. The GM will immediately manage all repairs and, if necessary, report to the CEO. The CEO will modify the external lighting plan as needed.
- c. Staff are responsible for keeping their area properly lit, and for notifying the GM if any lighting repairs are needed, beyond what is easily manageable by staff. The GM will manage all repairs in a timely manner in order to maintain the safety of the facility.

Maintaining a Barrier-free Entrance

Marin County Code Chapter 6.85.042, Section I1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To maintain the safety of the dispensary's front entrance and emergency exits

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - 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 assure that all required repairs and replacements take place

Security - 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 GM

Detailed Procedures:

1. Maintaining a barrier-free entrance
 - a. The CEO 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. Exterior security is responsible for clearing any easily cleared obstructions, or will immediately report issues to the GM, who will remedy the situation or schedule repairs.

Nuisance Prevention

Marin County Code Chapter 6.85.042, Section N1

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

Purpose:

To protect the safety of the dispensary and its surrounding neighborhood

Definitions:

None

Scope:

Facility exterior and surrounding area

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise a nuisance prevention plan

Chief Operations Officer (COO) - to implement the nuisance prevention plan, to make sure each staff member is trained, and to implement any membership revocations or suspensions that occur due to nuisance

Security - to be the first defense against nuisance, observing and reporting crime, and enforcing the rules of the dispensary

Receptionist - to educate members about the building rules and about nuisance prevention in the neighborhood

Detailed Procedures:

1. Maintaining a nuisance prevention plan
 - a. The CEO is responsible for creating, implementing, and updating nuisance prevention and reporting policies and procedures. These shall include 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 CEO will use this definition of nuisance, from the Marin County regulations: "'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. Outside security has primary responsibility for implementing the nuisance prevention plan. Security point of saleted at the front of the facility's parking lot will be vigilant in observing the street and nearby businesses for nuisance behaviors.
 - b. Security will 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 waiting in the car.
 - c. After spotting nuisance behavior, security will report via radio to the senior facility supervisor, who will be the CEO or designee.
 - d. If the nuisance behavior is onsite, security may remedy the situation by having a conversation with the patron, requesting that the activity cease. This will never be done if personal safety would be threatened in making the request. If any such fear exists, security will request that the CEO or designee call 911 immediately, or will yell to other outside security to call 911.
 - e. If the nuisance behavior is offsite, the CEO or designee will decide whether to send security offsite to manage the situation with a polite conversation, or to call 911 for police assistance.
3. Revocation of membership for nuisance violations
 - a. Small, nonrecurring 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 Sheriff, the membership of the person will be immediately revoked. The CEO or designee is responsible for assuring the person is stricken from the member role.

Control of Litter, Debris, Trash and Graffiti

Marin County Code Chapter 6.85.042, Section O1-2

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To keep the dispensary’s premises and surrounding areas clean and free of debris

Definitions:

None

Scope:

Facility exterior and surrounding area

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise a litter and debris control plan

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

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

General Manager (GM) - to assist the COO in keeping the entire facility clear of trash and debris

Receptionist - to assist the GM or COO in keeping the entire facility clear of trash and debris

Dispensary Patient Consultants - to assist the GM or COO 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 midday, and at any other time needed, the CEO or designee will ensure that staff clear the sidewalks adjoining the premises, plus 10 feet beyond property lines along the street, of all litter and debris.

2. Maintaining adequate external trash receptacles

- a. The CEO will assure that the premises, including the parking, is free of litter, debris and trash.
- b. The GM will assign staff to clean the external areas each day, again midday, and as needed.
- c. The CEO will make sure there are easy-to-access external garbage cans for the use of members.
- d. The GM is responsible for arranging for regular garbage pickup and for additional garbage pickups as needed, if an excess of trash or debris develops for any reason.

3. Graffiti removal

- a. The GM is responsible for arranging for all graffiti to be removed from the premises and parking lots within 72 hours of its application.

Odor Control

Marin County Code Chapter 6.85.042, Section I4

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure no offsite odor of cannabis

Definitions:

None

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

General Manager (GM) - to arrange and supervise any necessary repairs or actions required in the event of odor issues

Security - to report any odor from the dispensary that occurs offsite, to the COO or GM

Detailed Procedures:

1. Implementing and maintaining an odor control system

- a. The CEO and COO will supervise installment and maintenance of an air treatment system to ensure there are no offsite odors, including cannabis odors.
- b. Outside security and any other staff members will immediately report any odor problems to the GM.
- c. The GM will maintain the odor control system, including scheduled and unscheduled maintenance and repairs, and, when approved by the CEO and COO, will arrange upgrades to the system or the facility to deter odors.
- d. If such upgrades require the approval of any agency of the county, the CEO or COO will seek and gain such approval before authorizing the GM to implement the new system.

e. The CEO and COO are responsible for updating cannabis-handling procedures as appropriate to further deter odors.

Consumption Restrictions

Marin County Code Chapter 6.85.042, Section G1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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 dispensary’s entrance

Responsibilities:

Chief Executive Officer (CEO) - to create, implement and supervise this policy

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

General Manager (GM) - to enforce this policy

Receptionist - to educate members about this policy and immediately report any violations to security and the GM

Dispensary Patient Consultants - to enforce this policy and immediately report any violations to security and the GM

Security - to enforce this policy, immediately report any violations to the GM, and escort members of the public off the premises if required

Detailed Procedures:

1. Creation of a policy to prevent onsite cannabis consumption on the dispensary premises by members of the public

- a. Prior to the opening of the dispensary to the public, the CEO will create policies and procedures to ensure that members of the public 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” includes 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 CEO 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 and point of sale 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 and GM will assist the CEO in implementing these rules, including supervising other staff, creating signs and designing other means of educating members about the policy.

c. The receptionist is responsible for training each member on the rule and its importance. This will include speaking to each member about this policy and stating that membership will be revoked for violations of this rule.

3. Security procedures to prevent unauthorized onsite consumption

a. The CEO will implement security policies to prevent onsite consumption. This includes video surveillance of the property. Security will also be point of sale to observe outside and offsite behavior of members, and will receive training on how to speak with members who violate this rule.

No Redistribution of Cannabis Medicines Allowed

Marin County Code Chapter 6.85.042, Section G2

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

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

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and implement systems to support this policy

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

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

Purchasing Agent - to assure that all vendors understand this policy

Receptionist - to educate members about this policy during registration and as needed

Dispensary Patient Consultants - to observe, interrupt, and report any violations of this policy

Security - 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 CEO 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, point of sale of signs, relevant 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 point of sale 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 receptionist 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 point of sale of all signs and for keeping them in pristine, readable condition. Signs about this policy will be point of sale 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 Purchasing Agent, will ensure that each package of medicine at Urban Hills is labeled with a warning stating that it is not for redistribution.
3. Observing, interrupting, and reporting violations of this policy
 - a. The CEO, 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, to implement these policies, and they will provide tools for complete investigations into these matters, including a reporting form, video feed footage, and training on observing and reporting violations.

4. No vendors may sell cannabis to our members
 - a. The CEO, COO, and GM will make sure all vendors are aware of this policy, and that no direct sales occur between the Urban Hill vendors and our members. Violations of this policy will result in immediate revocation of the dispensary’s relationship with the vendor. If required by the state or county, the CEO will report this behavior to the relevant authorities. The GM will also warn the member that such interactions are not permitted and that repeat occurrences will be grounds for revoking membership.

5. Maintaining good neighbor and police relations
 - a. The CEO and COO will assure that Urban Hills 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 CEO will assure that all neighbors have contact information for our Onsite Community Relations Staff Person, so that they can report any violations to them.
 - b. The CEO and COO will assure Urban Hills maintains good relationships with the Marin County Sheriff’s Department. It is essential that Urban Hills be able to count on the Sheriff’s department to assist us in enforcing this law, if needed, and for the Sheriff Department to be able to depend on our systems to prevent violations.

No Onsite Cannabis Cultivation

Marin County Code Chapter 6.85.042, Section H1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure no cannabis is cultivated at the facility

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to assure the implementation of this policy

Chief Operations Officer (COO) - to assure the implementation of this policy

Detailed Procedures:

1. No cultivation of cannabis onsite

- a. The CEO and COO will assure that no cannabis is cultivated on the premises of the dispensary
- b. In the future, if Urban Hills seeks to cultivate onsite, the CEO and COO will acquire all proper local and state permits before beginning cultivation onsite.

Onsite Community Relations Staff Person

Marin County Code Chapter 6.85.042, Section I9

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure the County Administrator, the dispensary neighbors, and the community at large have a contact person at the community, and to encourage complaints to come directly to the dispensary

Definitions:

None

Scope:

Facility-wide and surrounding neighborhood

Responsibilities:

Chief Executive Officer (CEO) - to designate an Onsite Community Relations Staff Person and to report their contact information to the County Administrator, and to act as the Onsite Community Relations Staff Person, if designated

Chief Operations Officer (COO) - to help distribute contact information for the Onsite Community Relations Staff Person to the neighbors and community, and to act as the Onsite Community Relations Staff Person, if designated

General Manager (GM) - to act as the Onsite Community Relations Staff Person, if designated

Detailed Procedures:

1. Designating an Onsite Community Relations Staff Member
 - a. The CEO will provide the County Administrator with the name, phone number and facsimile number of an Onsite Community Relations Staff Person, to contact in the event of complaints or operating problems associated with the dispensary. This will be the CEO, COO or the GM, as designated.

2. Notify neighbors about the Onsite Community Relations Staff Member
 - a. The CEO, 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 complaints or operating problems, if any, before any calls or complaints are made to the county.
 - b. The Onsite Community Relations Staff Member will visit all neighbors, within a radius to be determined by the CEO and City Administrator. During these visits, the Onsite Community Relations Staff Person will inform them about the dispensary’s policies, and provide contact information, including their phone, fax, and email. The Onsite Community Relations Staff Person will mail this information to each neighbor who was unavailable during these visits.

No Onsite Physician Evaluations

Marin County Code Chapter 6.85.042, Section F4

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To meet the rules set forth by the County and the State Medical Board

Definitions:

None

Scope:

Administrative office

Responsibilities:

Chief Executive Officer (CEO) - 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 CEO and COO will assure the dispensary never has a physician onsite to evaluate patients and provide recommendations for medical cannabis.

Permission Needed to Increase Floor Area

Marin County Code Chapter 6.85.042, Section D2

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

Purpose:

To make sure the County Administrator approves changes to the dispensary’s floor area, and that the Urban Hills permit reflects any changes

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to assure all changes to the facility are approved and that the Urban Hills permit is modified to reflect them

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

General Manager (GM) - to assist the CEO and COO, as assigned

Detailed Procedures:

1. No changes to the facility without proper approval
 - a. The CEO 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 County amending the existing dispensary license.
 - b. The COO and GM will assist the CEO in securing all building and other permits, including securing professional services, like architects and building contractors, to perform any work to code.

Annual Review of Information

Marin County Code Chapter 6.85.042, Section F6

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure that Urban Hills meets mandated reporting requirements

Definitions:

None

Scope:

Administrative office

Responsibilities:

Chief Executive Officer (CEO) - to prepare all reports required for the annual review of information

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

Interim Controller - to assist the CEO with information needed for the annual review of information

General Manager (GM) - to assist the CEO with information needed for the annual review of information

Detailed Procedures:

1. Provision of annual reports to the review authority
 - a. The CEO, with the assistance of the COO, Controller and GM will provide information on the prior year’s operations to the review authority, as required by law.

2. Updating operations based on annual review
 - a. The CEO, with the assistance of the COO, Controller, and GM, will adjust the operations of the dispensary as necessary to address issues that arise from the annual review or any other review by the county authorities.

Maintain a Clean, Orderly, Sanitary Facility

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To promote 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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

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

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

Staff - to keep work areas and the entire facility clean and orderly at all times

Detailed Procedures:

1. Parking lot area maintenance

- a. Each morning before opening, at closing time, and throughout the day, security will:
 - Patrol the entire area including the parking lots and surrounding areas, picking up and disposing of saleing 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 and keeping all their equipment clean and well maintained

2. Reception and dispensing areas

- a. Each morning before opening, at closing time, and throughout the day as needed, staff will:
 - Clean and sanitize 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 disposal of saleing of trash
- Sanitize door handles, counters, and bathrooms with appropriate cleaning products
- Vacuum or scrub floors in their work area

3. Packaging, procurement and storage areas

- a. Each morning before opening, at closing time, and throughout the day as needed, staff will:
- Clean and sanitize their work areas, picking up and disposal of saleing of any trash and using appropriate cleaning products on stainless steel surfaces, scales and computer equipment
 - Keep workspaces organized, neat and orderly
 - Vacuum or scrub floors in their work area

4. Management offices

- a. Each morning before opening, at closing time, and throughout the day as needed, management will:
- Clean and sanitize their work areas, picking up and disposal of saleing 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

Management of Marketing Plans

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To communicate the availability and features of products to members in a clear and timely fashion

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Interim Controller – to analyze financial data to assess marketing programs

Purchasing Agent – to source needed products in keeping with the marketing plan, current market prices and availability, and to communicate new products to the COO and others involved in crafting marketing material

General Manager (GM) – to implement this policy on a day-to-day basis and coordinate flow of information and products between departments, and to assist with social media, public relations, and advertising

Detailed Procedures:

1. Development of a marketing plan
 - a. The CEO will set marketing goals and plans for achieving those goals, and will communicate these plans and goals to the COO and GM. The CEO, with the COO, will assess achievement of goals and success of plans, adjusting them as needed.
2. Implementation of marketing plans
 - a. The COO and GM will communicate the marketing plans and goals to all staff. The GM will coordinate the flow of information between departments so that marketing plans are implemented successfully
 - b. The COO will hold weekly meetings with the Purchasing Agent, and the GM to assess product availability, sales trends, and communications. The COO will make needed adjustments to achieve marketing goals and update the marketing plan 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 supervising the creation of a functioning online menu, and for supervising the team that keeps it current and operational. The GM will ensure all stock is listed on the online menu, and that the menu is functional at all times.
4. Advertising and Public Relations
 - a. The Purchasing Agent and GM will coordinate with vendors to train staff on new products and to schedule in-house demonstrations for patients.
 - 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 Interim Controller.
 - c. The Purchasing Agent will ask suppliers for informational materials about products. The GM will make sure these are generally in stock, and in the reception area or dispensary for members.

Adherence to ADA

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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 impoind of salees 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:

Chief Executive Officer (CEO) - to create and supervise this policy

Chief Operations Officer - to implement and supervise this policy, in coordination with security and the General Manager

General Manager (GM) - to assure that all required repairs, replacements, and improvements take place

Staff - to report any problems or needed repairs anywhere in the facility or on the grounds

Detailed Procedures:

1. Providing necessary architectural elements and services for patients and employees
 - a. The COO 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 and other work areas
 - Accessible desks and workspaces
 - At least one accessible restroom for each sex or a single unisex restroom
 - Accessible drinking fountains
 - If requested, accommodations for patients or employees 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 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 GM, 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.

Management of a Community Benefits Plan

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To offer compassion programs to vulnerable and otherwise qualified patients, and to act as a beneficial member of the community, through engaging with 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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Purchasing Agent - to select, package and store products for compassion programs

General Manager (GM) - to assist with scheduling of staff trainings and oversee day-to-day operations of community service programs, and to oversee updates to the webpage and monthly calendar that inform patients, caregivers, and the community about services and programs related to the compassion program

Receptionist - to assist with registering patients for compassion programs, and to keep flyers and announcements about community services in stock and up to date at the entrance to the dispensary

Dispensary Patient Consultants - 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 CEO 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 reception and the GM.
 - b. The CEO and COO will be responsible for establishing criteria for patient eligibility, and will assign the GM to oversee publicizing these criteria. Criteria will include seniors, qualified low-income patients, and military veterans who are residents of Marin County.
 - c. The COO and GM will develop a registration form and procedure for verifying a patient's eligibility for the compassion program and training staff on signing patients up for the program. The GM will train all receptionists, who will then register applicants for the program, and all dispensary patient consultants, who will administer the program at point of sale.
 - d. The COO will establish and oversee the publication of day(s) of the week and times when members may participate. The GM and receptionist 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 GM will oversee updates to the website to ensure it contains information about the program and how to register.
 - e. The COO will work with the purchasing agent to select products for the compassion program. The purchasing agent and GM will assign a staff member to package the compassion program products for members.
 - f. The Dispensary Patient Consultants will dispense compassion program products to patients in need.
 - g. 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 receptionist and Dispensary Patient Consultants, will gather this data.

2. Developing and implementing educational programs on safety and awareness
 - a. The CEO and COO, in coordination with the General Manager, 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 CEO, COO or 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 CEO, COO or 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 community beautification efforts near the dispensary and in-house art exhibits to promote local artists.
 - e. The GM will point of sale 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 and local good works
 - a. The CEO 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 of saleing trash, painting, gardening and making repairs
 - Sponsoring cannabis policy reform efforts and cannabis business and education conferences in order to support mission-based cannabis entrepreneurship
 - Offering scholarships to conference to members of communities impacted by the drug war
 - Collecting monies for special cases, including support for seriously ill children 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 cannabis 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 CEO and COO will organize staff to participate in events like local literacy programs, to volunteer at community Thanksgiving dinners, and to participate in park and community fundraising programs.

6. Designating a community ombudsperson
 - a. As described in the Onsite Community Relations Staff Person section, the CEO will designate a senior staff member to act as the community relations manager and liaison. This person will be assigned as the point of contact to address neighborhood concerns.
 - b. Security, reception, or any other staff who is the point person for receiving a visit from a concerned neighbor or other person will be friendly and accommodating. If point of salesible, the Onsite Community Relations Staff Person will be notified and will take over the situation. Otherwise, the responding staff will make a detailed report on the situation, and provide to the Onsite Community Relations Staff Person. In all cases, the responding staff person will take down all the details of the complaint, including the name of the person, the date, the time, their phone and email address. If the situation requires immediate attention and the Onsite Community Relations Staff Person is not available, the most senior staff person present will handle the situation. Otherwise, the information will be recorded in written form, and emailed or otherwise made available for the Onsite Community Relations Staff Person.
 - c. The Onsite Community Relations Staff Person will respond to each concern or complaint in a timely manner. In all cases the complainant should receive a friendly acknowledgement from the Onsite Community Relations Staff Person within two business days. Resolving the issue may be feasible immediately in certain situations, or after a longer process for others. All responses will be tracked and filed with the original complaint, and the resolution will be noted. The Onsite Community Relations Staff Person will report on all such incidents to the CEO within a week of the incident.

Recordkeeping, Storage and Document Provision

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

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

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Interim Controller - to supervise and manage all finance data and sales records

General Manager (GM) - to manage day-to-day operations in keeping with this policy; 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; and to provide documents to officials as required by law and upon request

Receptionist - to accurately enter and maintain all patient records

Dispensary Patient Consultants - to accurately enter all sales

Detailed Procedures:**1. Keeping financial and patient records**

- a. The receptionist will maintain records electronically via the point of sale database, and by scanning patient and caregiver documents into an electronic file, including the state-registered medical cannabis card 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 physician's recommendation, and any caregiver designation information.
- b. The GM is responsible for backing up data each day in two ways, both in a cloud-based system and on a computerized backup system. The GM or Interim Controller 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 GM, under supervision of the COO and Interim Controller, 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 GM or Onsite Community Relations Staff Person, with the oversight 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 and patient records

- a. The GM, under the supervision of the COO, will 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 GM, under the supervision of the COO, will ensure 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 GM will transport all paper copies of daily financial and patient records, along with a copy of the thumb drive, to storage in a secure offsite 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 GM 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 GM and Interim Controller, will provide the county with all membership and financial information required for inspection, upon notice.

b. The CEO and COO will, upon request, provide the county, Board of Equalization or IRS financial information. This includes documents 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 GM and Interim Controller, will make available to the City Administrator the books, papers, and tax returns for the purpoint of salee of verifying the accuracy of any declaration made or to ascertain the business tax due, compliance with and applicable laws.

d. The CEO, COO, Office Administrator and Interim Controller will respond quickly and completely, in a cooperative manner, to any administrative subpoena with the provision of relevant books, papers and records.

Opening Procedures

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Security - to implement this policy

General Manager (GM) - to open the dispensary to staff in the morning and oversee opening procedures, and to train staff on opening procedures

Staff - to manage assigned opening tasks

Detailed Procedures:

1. Opening the door to opening staff and management
 - a. At 7:30 AM or 2 1/2 hours before opening, security will be patrolling the parking lot.
 - b. At 8:30 AM or 1 1/2 hours before opening, the CEO, COO, or GM will open the door to the dispensary and let dispensary staff and security into the facility. The door will remain locked during opening procedures.
 - c. Security will verify the integrity of the facility.
 - d. 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 or GM will unlock the cash drop safe and remove and recount the previous evening's cash sales, checking to see that it matches the tally sheet from the night before.
 - b. The COO or GM will open the main cash safe, add the previous evening's funds to the bundles, and count the entire cash inventory, using a cash inventory sheet. This sheet will be given to the Interim Controller, to balance the cash count and to investigate cash over/short issues.
 - c. The GM will prepare the numbered cash envelopes with \$150 each in change and assign them to Dispensary Patient Consultants as they are assigned their daily service stations.
 - d. The GM will remove the daily cannabis supply from the safe, and will supervise a daily morning count of all active stock. Stock will be assigned to Dispensary Patient Consultants, and set up near each station. All inventory tallies will be given to the GM and Interim Controller, who will match the totals to the previous evenings counts. The GM or Interim Controller 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 9 AM or one hour before opening, security will unlock the gate for employee parking and will pick up and dispoint of salee of any trash in the parking lot and surrounding areas.
 - b. Front door security will open the door for staff as they arrive, and relock the door after they enter.
4. Setting up the reception area
 - a. The receptionist 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 receptionist will clean the bathroom and stock it with toilet paper and hand towels. They will clean the reception area, picking up and dispoint of saleing of any trash, and wiping down counters and machines, and will vacuum the front desk and lobby areas.
 - c. The receptionist will stock the reception area with calendars and other literature for patients.
 - d. The receptionist 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 Dispensary Patient Consultants will receive their station assignments, cash envelopes and cannabis supply from the GM. They will go immediately to their station, placing their cash in the cash drawer, and checking their supply of medicine.
- b. Dispensary Patient Consultants will turn on their computers and sign in to the point of sale program. If any problem arises, the GM will assist.
- c. The GM will assign tasks as follows:

GM:

- 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

Dispensary Patient Consultant #1 will:

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

Dispensary Patient Consultant #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

Dispensary Patient Consultant #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 security and staff are responsible for picking up a numbered walkie-talkie and turning it on at the beginning of their shift.
- b. Before opening, a supervisor will perform a radio check, calling each walkie-talkie by number and making sure that each staff member and security guard responds when his or her number is called.

5. Opening the doors to patients

- a. At 10 AM or at opening time, front door security will announce on the radios to all staff that the doors are opening.
- b. Front door security will open the front door and allow patients to enter, ensuring that they do so in an orderly fashion.

Closing Procedures

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Security - to implement this policy, in coordination with COO

General Manager (GM) - to close the dispensary to staff in the evening and oversee closing procedures, and to train staff on closing procedures

Receptionist - to manage assigned closing tasks

Dispensary Patient Consultants - to manage assigned closing tasks

Detailed Procedures:

1. Locking the dispensary door at closing time

- a. The GM will announce by radio to all staff that the Dispensary is closing at 8 PM.
- b. The receptionist and Dispensary Patient Consultants serve all members who are in the building, but no new members will be allowed to enter after 8 PM.
- c. Security 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 receptionist 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, security will lock the front door.
- e. Parking lot security will make sure all patients go to their cars in a quiet and orderly fashion, and will lock the parking lot gate 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 Dispensary Patient Consultant. Each one will count and record the day's cash on tally sheets, and place these sheets and all funds into the numbered bags, then give them to the GM to put in the cash drop safe.
- b. At the end of each shift, Dispensary Patient Consultants will:
 - Use the point of sale 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 point of sale 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 GM

3. Securing cannabis flowers from the dispensary floor

- a. Dispensary Patient Consultants will empty their station of inventory each evening, and return any items to the GM.
- b. The GM will store these items in the safe for the evening.

5. Tidying and cleaning counter

- a. The Dispensary Patient Consultants are 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

6. Computers, scales and walkie-talkies

- a. At the end of the working day, the Dispensary Patient Consultants are responsible for exiting the point of sale software program and turning off their computer and any scales.
- b. Staff are required to turn off and place their walkie-talkies on a charger.

Maintaining Fully Integrated Equipment

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to oversee the day-to-day operation of this policy and to schedule and supervise outside service providers

Detailed Procedures:

1. Setting up fully integrated equipment
 - a. The COO will hire an outside service provider to manage IT. Under the supervision of the COO or designee, this 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 point of sale 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. The COO, with the assistance of the GM, will respond to any reported issues with the integrated systems in a timely manner. Employees will report any problems with systems immediately to their supervisor.
 - b. The COO, with the assistance of the GM, 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 GM, will schedule routine maintenance on all equipment as recommended by manufacturers.

Entry by Service Professionals

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to schedule supervise outside service providers

Receptionist - to greet outside service providers

Detailed Procedures:

1. Notifying the county of third-party visitors to the dispensary
 - a. The COO or GM will notify the County 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. The COO or GM will inform security and the receptionist that a visitor is coming, and instruct them to alert the GM when the service professional has arrived. The receptionist will log the time of arrival and identification of the visitor.

- b. Security and the receptionist will greet any visitors at the reception desk. The GM will come to the desk escort them to the area where they will be working.
- c. Staff will be assigned by the GM to monitor any visitor’s work. Staff will observe the visitor directly or via security cameras to make sure they stay at their workstation.
- d. 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. The receptionist will log the time of departure of the visitor.

Management of the Management & Operations Plan

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

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

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) – 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

General Manager (GM) – to manage the day-to-day operations of the Management and Operations Plan

Detailed Procedures:

1. Management of the Management and Operations Plan

- a. The CEO 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 CEO 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 CEO will update the management and operations plan as needed and the COO will promulgate the changes to the necessary staff.
- d. The CEO, 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.

Facility Maintenance

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - 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

General Manager (GM) - to receive reports of needed maintenance and assign Facilities Manager with investigating; to oversee regular inspection of facilities, routine maintenance, and outside contractors; to contract with outside service personnel as needed

Detailed Procedures:

1. Establishing a procedure for maintaining the facility
 - a. The CEO, in coordination with the COO, will establish a procedure and budget for routine maintenance of the facility.
 - b. Staff and management will report required repairs to the GM.
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 GM, under the supervision of the COO, 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 GM will disperse approved payments to equipment and service providers.

Internal Signs

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To point of sale 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:

Chief Executive Officer (CEO) - 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 MARIN 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 MARIN COUNTY.

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 GM will point of sale all signs where members can easily view them.

3. Posting licenses and tax certificates

- a. The CEO will ensure that Urban Hills point of sale a copy of the Business Tax Certificate and a copy of the Cannabis Dispensary Permit issued by the City Administrator’s Office in a conspicuous place on the premises.

Ordering of Supplies and Equipment

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

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

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - 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

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

Detailed Procedures:

1. Determining needs and placing orders

- a. The COO will pre-approve items for ordering and make the list of these items available to the GM. The COO will approve orders of any items not on the pre-approved list, if they cost more than \$200.
- b. The GM, with the assistance of designated staff, will conduct a weekly inventory of supplies (stationery, packaging supplies, cleaning supplies, etc).
- c. The GM will note the items staff has written on the Order Board and make sure they are not in back stock.
- d. The GM 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 GM 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 GM will set up a receiving area in the dispensary back room for all shipments.
- b. The receptionist will receive all orders, using the walkie-talkie to call the GM to let them know of all deliveries.
- c. The GM 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 GM 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.

Maintenance of Electronic Recordkeeping

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) – 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 point of sale system with daily updates to products offered, prices; to ensure that sales data is entered properly by Dispensary Patient Consultants and by the Receptionist

Dispensary Patient Consultants – to properly enter all sales into the point of sale system

Inventory Managers – to properly enter all weights and product counts into the

Detailed Procedures:

1. Maintaining the point of sale system with daily updates to products offered and prices
 - a. Under the supervision of the COO, the General Manager will review daily the products and prices entered into the point of sale system and perform any updates needed, including the addition or termination of any specials on products. They will ensure that the point of sale 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 Dispensary Patient Consultants
 - a. The COO, with the assistance of the General Manager, will train each Dispensary Patient Consultant on entering sales into the point of sale system.
 - b. The COO, with the assistance of the Interim Controller, 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 General Manager will train the Receptionists 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 Office Administrator, 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 General Manager, 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 Interim Controller will reconcile available inventory with electronic database. With the COO and General Manager, they will investigate and understand each over/short.
 - c. The COO or General Manager may adjustments to prices and availability of products as needed in the electronic database.

Traffic Control

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - 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 - to train its agents in the implementation of this policy; to oversee day-to-day operations

Ombudsperson - 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 CEO will implement a traffic control plan to assure Urban Hills 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. Two security agents 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. Security 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 CEO, 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 Security 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 Security officers and valet parking all cars in the lot.
- c. The COO, with the assistance of the Ombudsperson, 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.

Providing Education and Referrals on the Benefits and Potential Abuses of Cannabis

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - 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

Human Resources Consultant - 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;

General Manager - to consult with patients or caregivers who may need education or referrals about cannabis uses and substance abuse

Website Manager - to develop and update webpage and monthly calendar to inform patients and caregivers of educational programs and referrals

Dispensary Patient Consultants - to alert the General Manager or COO when a patient or caregiver may need educational programs or referrals

Receptionist -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 CEO and COO, in coordination with the General Manager 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 CEO 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 General Manager, 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 Receptionist or Dispensary Patient Consultant 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 will be managed by the COO or by the outside Human Resources person.
 - c. Once notified of an issue, the General Manager 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 General Manager 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 General Manager 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 will 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 CEO and COO, in coordination with the General Manager, 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.

Seeking and Maintaining Certification as a Green Business

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

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:

Chief Executive Officer (CEO) - 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 - to supervise developing patient and employee handbooks with information about the Green Business Program and how to comply with it; to develop and point of salet signs in the dispensary with the Pledge to Stay Green

Social Media and Website Manager - to update the website and social media sites with information about this program

Ombudsperson - 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 Office Manager will point of salet 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 CEO will renew the Green Business Certification as needed in a timely and efficient manner, striving to exceed compliance whenever point of salesible. The Office Administrator will point of salet 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 General Manager 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 Social Media and Website manager 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 Office Administrator will design and point of salet signage in the dispensary saying:
"We believe a successful business is dependent on a healthy environment. We are actively working 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 CEO, with the assistance of the COO, 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 CEO, with the assistance of the COO, will work cooperatively with the community and neighboring businesses to implement sound environmental policies.

Noninterference with Union Organizing

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To implement a policy of noninterference with union organizing, and make sure that unions and employees are aware that the dispensary’s management will not interfere with employees’ decisions to unionize

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

Chief Operations Officer (COO) – to implement and supervise this policy, including allowance of union visitors to the dispensary; to direct the Human Resources Consultant to include this policy in the Employee Handbook

General Manager (GM) - to supervise day-to-day operation of this policy, including oversight of union visitors to the dispensary

Human Relations Consultant - to inform employees of this policy

Detailed Procedures:

1. Development and implementation of noninterference policy
 - a. The CEO, with the assistance of the COO, will research legal opinions, state and local laws, and work with appropriate agencies such as the National Labor Relations Board to develop a policy of noninterference with union organizing, including a "card check" agreement under which the dispensary pledges to recognize a union automatically if a certain number of signed union authorization cards are collected.
 - b. The COO will implement a policy giving union representatives permission to come on company property during work hours for the purpose of salee of collecting union authorization cards, in keeping with policies for non-patient visitors to the facility.
 - c. The COO will develop a policy and instruct management staff that supervisors are prohibited from saying anything negative about the union or unionization during an organizing drive.
 - d. Develop a policy and instruct management staff and security officers that pickets or protests are to be permitted on dispensary property
 - e. The General Manager will oversee any union representative visiting the site in accordance with non-patient visitor policy.

SECTION 2

Patient and Caregiver Registration and Recordkeeping

Age Limits on Membership

Marin County Code Chapter 6.85.042, Section B

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that no patient under the age of 18 years is permitted inside the premises, unless accompanied by parent or legal guardian.

Definitions:

None

Scope:

Front door and Reception

Responsibilities:

Chief Executive Officer (CEO) - to establish and supervise this mandated age limit

Chief Operations Officer (COO) - to implement this policy and to supervise ongoing adherence to it

Office Administrator - To ensure that all staff are trained and aware of all state regulations and to ensure this procedure is followed

General Manager (GM) - To supervise all receptionists, making sure they have the tools, recourses and knowledge to adequately identify and locate date of birth on valid government issued identification

Receptionist - To ensure all patients entering the premises have physical, valid government issued identification, and that patients age is 18 years or older or are accompanied by their parent or legal guardian.

Security - To prevent entrance of underage patients at the door, by checking ID before entry and to ensure that any underage patients exit the premises immediately if a disqualified date of birth is discovered

Detailed Procedures:

1. Establishing and implementing this policy

- a. The CEO will create procedures to carefully screen every person who enters the facility. This will include making sure that only patients and caregivers enter the facility, and that no one under the age of 18 enters the facility, unless accompanied by a parent or guardian.
- b. The COO will implement this policy by developing a screening process for front door security, with a secondary screening process at registration, and will create a training process for staff.
- c. The General Manager will train staff and make sure that the Receptionists has all information necessary to fully screen members. The General Manager will supervise the Receptionists, making sure each member is properly approved, before they are allowed to enter the dispensary.

2. Screening Patient ID’s at the front door

- a. Security Staff will check all members ID’s and doctor’s note at the door, in order to verify that people are of age and qualified for membership. This is a pre-screening only, as the receptionist will verify the validity of all ID’s and membership cards.
- b. Security Staff will check the ID of anyone under the age of 18’s parent or guardian, before granting access to the reception area.
- c. Security Staff will deny access to the reception area to anyone who does not have a doctors recommendation, who is not over 18, unless accompanied by a parent or guardian, or who is under 18, but is the caregiver for the parent or guardian. All other people will be kindly asked to leave immediately, and offered the opportunity to return, if and when properly qualified.

3. Intake of qualified patients

- a. The Receptionist will inspect patient provided, valid, government issue identification, in order to review the patients date of birth and ensure each qualified patient is 18 years or older. If the qualified patients date of birth is found not to be 18 years or older, the Receptionist will then verify that the underage person is a primary caregiver or qualified patient and that they are accompanied by their parent or legal guardian.
- b. If the person is not qualified to enter, the Receptionist will ask them to leave the facility, with the assistance of Security staff to walk them out in a polite manner.

Membership Limited to Patients and Caregivers

Marin County Code Chapter 6.85.042, Section D6

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure all persons entering premises are verified medical cannabis patients or caregivers for verified patients

Definitions:

None

Scope:

Front Door, Reception Area and Administration

Responsibilities:

Chief Executive Officer (CEO) - to establish and supervise procedures that assure only patients and caregivers are allowed access to the facility

Chief Operations Officer (COO) - to implement this policy and to supervise the staff responsible for assuring adherence to it

Office Administrator - To ensure all staff are trained and have the knowledge to verifying a current, state approved medical cannabis recommendation and to retain proof of such for each member

Receptionist -To verify patients have a valid and current doctor's recommendation for use of medical cannabis, and to verify all caregivers are qualified and to collect the proper records for each member

Security Staff - To screen people at the front door, in order to make sure they have doctor's recommendations or are caregivers

Detailed Procedures:

1. Establishing a policy to ensure only patients and caregivers gain access to the Urban Hills dispensary
 - a. The CEO will to establish and supervise procedures that assure only patients and caregivers are allowed access to the facility.
 - b. This policy will include verifying that each patient carries a valid doctor's recommendation for medical cannabis from a licensed physician.
2. Implementing the policy to assure that only patients and caregivers gain access to the dispensary
 - a. The COO will implement this policy and to supervise the staff responsible for assuring adherence to it.
 - b. For patient members, the policy will be that:
 1. Each member must have either a state-registered medical cannabis card, a copy of their original physician's recommendation, or an equivalent card issued by their licensed physician.
 2. Before a new member is allowed to access the dispensary, the Receptionist will call the doctor's office or will use their online verification system to check that the recommendation is valid.
 3. The Receptionist will also verify that the doctor is licensed in CA, by checking the Medical Board's records.
 4. Members will only be allowed to complete their registration, and enter the dispensary, after both of these qualifications are met.

- c. For caregiver members, the policy will be that:
 1. The patient member they represent must be with them on the first visit, to verify that each caregiver is an actively giving care, and is qualified to purchase medicine for the patient member they represent.
 2. The patient must register first, and be verified fully, and then they can complete an Urban Hills Caregiver Designation form for their caregiver.
 3. After this, their designated caregiver will be able to acquire medicine for the patient they assist.
 4. Patients can revoke the rights of their caregiver at any time, by phone, email or in writing, and Urban Hills will immediately revoke their access to the facility.

3. Staff training

- a. The Office Administrator will ensure that all staff are trained and have information about these procedures and the state regulations, and that they have the knowledge to identify and locate patient name and dates verifying a California physician's recommendation or state-registered medical cannabis card.
- b. The Office Administrator will ensure that all staff are trained to verify the licenses of each doctor, using the State Medical Board's website.

4. Verifying patient recommendation and doctor's licenses

- a. The receptionist will require each patient member to register, when they first join the dispensary. They will collect a copy of the member's physician's recommendation for medical cannabis and information about how to contact the physician to verify the validity of the recommendation. They will also collect a valid, government issued I.D. from each member.
- b. The Receptionist will verify each doctor's recommendations using phone or internet verification procedures. No member will be allowed to access the dispensary, until the doctor's recommendation can be validated.
- c. For recordkeeping, the dispensary will maintain records of all patients and caregivers using only the identification 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 need for medical cannabis. The CEO will assure this policy is in place, and the COO will implement this, with the assistance of the Office Administrator and Receptionist.

5. Registering and verifying caregivers

- a. The Receptionist will require each qualified caregivers to register, before entering the dispensary. On the first visit, the patient and caregiver must come together, and the patient's registration must be completed, before a caregiver can register.
- b. The Office Manager will make sure that the Receptionist has caregiver registration forms available at all times, so patient members can designate their caregiver as a member of Urban Hills, 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 caregiver status at any time, by phoning, emailing or notifying the collective in person. The Receptionist or Office Manager can de-active a caregiver membership, which will be done immediately upon notification that any caregiver/patient relationship has terminated.

- 6. Screening current and potential members at the front door
 - a. Security Staff will screen people at the front door, checking that each person is carrying a doctor’s recommendation or is a designated caregiver, before they enter the building.
 - b. If any person arrives without a doctor’s note or is not a designated caregiver, Security Staff will politely inform the person that they are unable to enter the facility.
 - c. Urban Hills will make information about medical cannabis, the laws, and about talking to their own doctors to these people, if requested. The Receptionist will bring out an information packet for anyone who is interested in this information.

- 7. Maintaining patient and caregiver records
 - a. At registration, the Receptionist will take either a photocopied or scanned copy of each members doctors recommendation, their government issued ID, and of any caregiver agreements.
 - b. The Office Manager is responsible for maintaining all physical and digital records collected from members.

Limit on Member Numbers

Marin County Code Chapter 6.85.042, Section D1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:
To ensure number of patients does not exceed county guidelines

Definitions:
none

Scope:
Front Door, Reception Area and Administration

Responsibilities:
Chief Executive Officer (CEO) – To set capacity and to implement and supervise a system of compliance for this policy

Chief Operations Officer (COO) – To determine how physical and digital patient documents are kept and filed and to implement membership limits, if needed

Office Administrator – To ensure physical and digital records are kept and organized, in order to maintain a current count of members

General Manager (GM) - To ensure daily tracking of new patients

Receptionist - To properly log and file new patient documents in files in order to maintain a current count of members

Security - To turn away potential new members, if the collective is at capacity

Detailed Procedures:

1. Proper record keeping upon intake of new members
 - a. The CEO is responsible for setting up a compliant storage system for patient records, which the COO will implement. This record will include a total number of members, and if the collective reaches capacity, new member registration will be halted until space is available.
 - b. Receptionist, with assistance from the Office Administrator, will register new patients and caregivers by saving digital files and filing physical documents in order to easily achieve current patient count.

2. Limiting members if the collective is at capacity
 - a. The CEO and COO will work with the County, surrounding businesses and neighbors to assure that all policies regarding capacity meet the standards of the law. The goal is to reduce any adverse impacts the collectives member visits have on our community.
 - b. The CEO, with the assistance of the COO, will set up systems to supervise that no new members are registered at the collective, if the facility is at capacity. New member registration will only begin again, as others drop off the register of active members.
 - c. The receptionist will not register any new members, if the collective is at capacity.
 - d. Security will check with each person to see that they are registered members, before entry, and will deny access to the facility to any new person, if the dispensary is at capacity.

Entering the Facility

Marin County Code Chapter 6.85.042, Sections D3, D5 , and I1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure only qualified and verified patients and caregivers are allowed admittance into facility for the receipt of medical cannabis

Definitions:

none

Scope:

Front Door, Reception Area

Responsibilities:

Chief Executive Officer (CEO) - To ensure floor plan of dispensary has separate admittance and dispensing areas and to create systems to register and verify members

Chief Operating Officer (COO) - To implement and supervise registration and verification procedures

Receptionist - To ensure only qualified patients are allowed into dispensing area

Security - To verify that each person entering the facility is a patient or caregiver

Detailed Procedures:

1. Accepting qualified patients onto premises

a. The CEO and COO will assure the facility is set up to only allow verified members into the dispensary. This will include 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 COO will ensure that the entrance to the dispensary is locked at all times, with buzz in access, and that there is a viewer on the door to allow the maximum angle view of the exterior entrance.

b. The Receptionist will check in each person who enters the facility. Each member will have to show their government approved I.D. and doctor’s recommendation or County issued medical cannabis I.D. card to gain entry. If they are not yet registered, the Receptionist will register them, and will verify the validity of the doctor’s recommendation.

2. Buzzing members into the dispensary

a. Upon verification of membership, the Receptionist will permit qualified patients and caregivers into dispensing area, via a “buzz-in” electronic entry system.

b. Security staff is to serve as a secondary measure of ensuring only qualified and approved members are permitted into the dispensing area. They will stop any person attempting to barge past the reception desk, and enter surreptitiously with a registered member.

Attachments:

Mandatory Information Given to Members

Marin County Code Chapter 6.85.042, Section G

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To educate new members about the laws, regulations, facility rules and etiquette

Definitions:

none

Scope:

Reception Area

Responsibilities:

Chief Executive Officer (CEO) - To determine what types of documentation and information will be presented to members and that it current, legal and valid

Chief Executive Officer (COO) - To locate or create the best information point of salesible for members, including building rules and guidelines and instructional or educational literature

Office Administrator - To ensure all information is complete, organized and ready for distribution to members, either digitally or in hard copy

Receptionist - To distribute information to all incoming members

Detailed Procedures:

1. Distribution of mandatory information
 - a. The CEO and COO will work together to create accurate information about the medical cannabis rules and regulations governing use and consumption within the County. They will also create recommendations on sensible cannabis use and etiquette.
 - b. The Office Administrator 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 will be updated and redistributed, as needed.
 - c. The receptionist is to distribute these documents to all new members, and to returning members, each time notable update occurs

Discouraging Daily or Weekly Visits

Marin County Code Chapter 6.85.042, Section F1

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To discourage over occurrence of visits within a short period of time

Definitions:

none

Scope:

Reception, Dispensing Area

Responsibilities:

Chief Executive Officer (CEO) - To create policies and to devise incentives that discourage daily and weekly visits in favor of monthly visits

Chief Operations Officer (COO) - To create programs that educate members on the impact of repeated visits and to implement policies preventing frequent visits

Office Administrator - To set up digital patient tracking system

General Manager (GM) - To ensure patient tracking system is being used, and that members who visit daily and weekly are turned away

Receptionist - To implement patient education programs through communication and distribution of literature and use the patient tracking system to screen members for frequent visits

Detailed Procedures:

1. Encouraging monthly visits and discouraging daily or weekly visits.
 - a. The CEO will supervise and assist the COO in creating a member education program and incentive program to encourage members to visit monthly. This will include providing all newly registered members a written document within the admittance packet that will clearly state the expectation of monthly visits.
 - b. Office administrator is to set up a digital tracking system to regulate the number of visits by date and time in order to address frequent repeat visits.
 - c. The receptionist is to use the digital tracking system upon signing in each patient entering the facility. If it is noted that the member is visiting more often than requested, the receptionist will remind the member of this guideline, and will deny access to members who abuse this regulation.

Maintaining and Storing of Patient Membership Records

Marin County Code Chapter 6.85.042, Section F5

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure proper membership records are filed and stored for the required length of time

Definitions:

None

Scope:

Reception and Administration

Responsibilities:

Chief Executive Officer (CEO) - To establish and supervise a recordkeeping system

Chief Operations Officer (COO) - To implement the recordkeeping system

Office Administrator - To ensure proper filing, maintenance and destruction of membership records

Receptionist - To file and label membership records

Detailed Procedures:

1. Maintenance of patient membership records and documents

- a. The CEO will design a recordkeeping system to maximize the confidentiality of members. Rather than storing patients private information, the collective will store member data using the I.D. number on 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 COO will implement and supervise this policy, designing systems for digital and paper storage.
- c. The Office Administrator will to ensure that the proper filing, storage and safe keeping of membership records is done. Patient membership records will be reviewed and destroyed at least every 12 months or upon expiration of the verification.
- d. The receptionist will file membership records according to the I.D. number on the members county card, or, if this is not available, by name, and by the expiration date of their doctor recommendation.

Confidentiality of Information

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To check patients and caregivers in and maintain their records in a manner that ensures confidentiality of information

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to train Dispensary Patient Consultants and Receptionists on procedures to ensure confidentiality; to oversee day-to-day operations making sure that the procedures are followed

Receptionist - to register or verify patients and caregivers, and maintain records, according to confidentiality standards and practices

Dispensary Patient Consultants - to serve patients and caregivers and maintain records according to confidentiality standards and practices

Security - to serve patients and caregivers according to confidentiality standards and practices

Detailed Procedures:

1. Creating and implementing a confidentiality policy

- a. The CEO will create policies and supervise related procedures to make sure member confidentiality is maintained at the dispensary.
- b. The COO, with the assistance of the GM, will oversee day-to-day operations to ensure that confidentiality procedures are carried out throughout the facility.

2. Training staff on confidentiality policies and supervising them

- a. The COO will implement trainings, with the assistance of the General Manager to train Receptionists, Dispensary Patient Consultants and Security on dispensary procedures to ensure patient confidentiality, including but not limited to:

1. Dispensary policy of not sharing patient or caregiver records; means of informing patients and caregivers of this policy including security of servers and data back up systems.
2. Procedures for shredding patient records after the necessary information is been entered into the point of sale system or patient database.
3. Using discretion when calling a patient to the desk or vendor area, or entering or exiting the facility; not calling their name or using their last name.
4. Not asking for a patient's medical condition or entering their condition into the database, unless the patient requests a consultation with the Clinical Services Director to discuss their condition.

Policy:

Assuring the Integrity of Doctor Recommendations

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure the integrity of doctor recommendations presented by patients and caregivers, in keeping with state and local law

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to train staff on this policy and oversee day-to-day operations; to communicate information about any banned or suspect doctor(s) to staff along with policy for communicating that information to patients

Office Administrator - to review doctor recommendations flagged as potentially noncompliant and assist the General Manager is establishing policy and about acceptance or non-acceptance

Receptionist - implement this policy and report any potential abuses to the General Manager

Detailed Procedures:

1. Establishing and implementing policies to ensure integrity of physician recommendations
 - a. The CEO, with the assistance of the COO, 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
 - b. The COO, with the assistance of the Office Administrator, will include in the Patient Membership Agreement to be signed by all new and renewing dispensary members, checkboxes for these phrases:
 1. "I have a medical reason for using cannabis."
 2. "My recommending physician has taken responsibility for an aspect of my medical care, treatment, diagnosis, counseling, or referral."

3. "My recommending physician conducted a medical examination before issuing my recommendation."
 - c. The COO, with assistance from the Office Administrator, 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 Receptionist will verify the doctor's license (MD or DO) is current and complete at the California Medical Board website (<http://www.mbc.ca.gov/>)
 - b. The Receptionist will verify that the patient checks the boxes next to the above phrases in the Patient Agreement and signs the Agreement.
 - c. The Receptionist will report to the General Manager about any potentially noncompliant issues. This will then be reported to the CEO and COO for review. This includes:
 1. Physicians who appear to be repeating acts of clearly excessive recommending of cannabis for medical purpoint of sales, 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).
 2. Physicians who may be recommending medical cannabis without a medical reason for the recommendation, based on statements made by a patient.
 3. Physicians who offer remuneration to the dispensary in exchange for referrals.
3. Reviewing doctor records and determining integrity of recommendations; allowing or disallowing recommendations
 - a. The Office Administrator will review on a monthly basis the number of physician recommendations presented from all doctors, flagging. These will be reported to the CEO and COO for investigating any that are excessive in number.
 - b. The CEO and COO will investigate any reports from Receptionist or Dispensary Patient Consultants about doctors who may not be conducting a good faith prior exam or are issuing recommendations without a medical reason.
 - c. The CEO and COO will determine whether or not a physicians' recommendation will be accepted at the dispensary and communicating this information to the Receptionist.
 - d. If a physician's recommendation is no longer accepted, the Receptionist will inform the member that they must secure a new recommendation in order to maintain their membership status.

Providing Wellness Services to Members

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To create and supervise wellness programs to serve each member

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

Chief Operations Officer (COO) - to implement and supervise this policy; to decide which services to offer and to hire providers from them

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

Receptionist - to alert the Clinical Services director when a new patient or one that 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 entrance to the dispensary

Social Media and Website Manager - to develop and update the webpage and monthly calendar to inform patients and caregivers of wellness services and programs and to announce services on all social media platforms

Detailed Procedures:

1. Developing and implementing wellness services and support groups for patients
 - a. The COO, in coordination with the General Manager—and after gathering input from dispensary members—will develop, implement and publicize programs to offer skills building and wellness services for patients, such as:
 - Massage therapy, Chiropractic therapy, Nutritional Counseling, and Chinese Medicine 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

2. Offering clinical services to patients and caregivers and gathering input from them
 - a. The General Manager will attempt to interface with all new patients, and any patient in need of special attention by being alerted by the Receptionist when a new patient arrives, greeting the patient when they enter the dispensing area, introducing them to procedures and products, and introducing them to a Dispensary Patient Consultant.
 - b. The Receptionist or Dispensary Patient Consultant will alert the General Manager when a patient is in need of counseling or information about compassion or wellness programs or services. The General Manager will respond with information and assistance.
 - c. The General Manager will spend time in the dispensing area observing if a patient is agitated or in difficulty and approaching them to offer help.
 - d. The General Manager and Patient Services Consultants will communicate with patients about the results of their cannabis therapies and concerns about their cannabis use, in order to help them with successful choices.

Attachments:

None

Check-in Procedures

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To check patients and caregivers in to the dispensary in an efficient manner that ensures accuracy and privacy

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to oversee day-to-day operations

Receptionist - 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. The COO, with the General Manager, will implement this policy.
 - b. The Receptionist will greet each patient as they enter the dispensary, asking for their California driver's license or ID card. All members must have a current government I.D. to register for membership.
 - c. The Receptionist will look the patient's name up in the point of sale system to verify that they are a member and that their doctor's recommendation is current. The Receptionist will notify any member whose recommendation is due to expire.

2. To update patient files in keeping with this policy
 - a. After greeting the patient, asking for their ID, and looking up their name in point of sale tracking system, if the patient's recommendation has expired, the Receptionist will inform the patient that they need to renew their recommendation with their doctor.
 - b. If they need a doctor, the Receptionist will provide a list of doctors where they can make an appointment for a recommendation.
 - c. When the patient returns with their updated recommendation, the Receptionist will scan the recommendation and contact the doctor's office via telephone or website to verify it. The Receptionist will update the tracking system with the new expiration date for the patient.
 - d. If the doctor is unknown, the Receptionist will verify their license at the California Medical Board website.

3. To sign up new patients in keeping with this policy
 - a. If after asking for ID the patient or caregiver is not verifiable as a member, the Receptionist will ask for their doctor's recommendation, scan it, and contact the doctor's office via telephone or website to verify it.
 - b. If the doctor is unknown, the Receptionist will verify their license at the California Medical Board website
 - c. The Receptionist will have the patient read, check each line, and sign the Patient Agreement and Code of Conduct.
 - d. The Receptionist will update the point of sale system with the expiration date for the patient and the date that they signed the Patient Agreement and Code of Conduct.

4. To sign up caregivers in keeping with this policy
 - a. If a caregiver wishes to sign up to pick up medicine for a patient, the Receptionist will verify that the patient (who must be present) has a current recommendation.
 - b. If the Caregiver has a Caregiver Agreement signed by the Patient, the Receptionist will scan the agreement. If the Caregiver does not have an Agreement, have them fill out a Caregiver Agreement, direct both the Caregiver and Patient sign the agreement, and scan the agreement.
 - c. The Receptionist will have the Caregiver fill out the Patient Agreement and Code of Conduct.
 - d. The Receptionist will create a file for the Caregiver in member tracking system giving the name of the Patient, the date that that the agreement was signed, and the expiration date of the agreement.

Inventory Management

Appropriate Payment for Cannabis Medicines

Marin County Code Chapter 6.85.042, Section H5

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that the dispensary is paying appropriately for cannabis medicines, in order to offer the best prices to our patients and to for the viability of the organization

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO) - to establish a system for evaluating, pricing and tracking medical cannabis products

Chief Operating Officer (COO) - to implement a tracking system and to work with the purchasing agent to evaluate incoming medical cannabis products

Interim Controller - to review all purchases and payments and make recommendations to maximize inventory flow and profitability

Purchasing Agent - to evaluate all incoming products from vendors

General Manager (GM) - to assist the COO in monitoring purchasing patterns and trends and report findings to Purchasing Agent

Detailed Procedures:

1. Accessing patient and inventory needs and trends

- A. The purchasing agent shall be responsible for monitoring inventory of all medical cannabis flower, concentrates and packaged products onsite to ensure that s/he is purchasing products that are needed. The purchasing agent will monitor sales patterns and patient demand, working with the COO

and GM to ensure that the needed products are stocked. Special attention will be paid to medical cannabis products that are potent in CBD, THC-A; as well as, alternative modes of ingestion and delivery.

2. Conducting market research

B. The COO is responsible for keeping an up-to-date understanding of current industry market dynamics by monitoring other dispensaries' websites, reading pertinent industry publications, and attending industry events. Urban Hills will supply cannabis to our members at the most competitive prices to ensure the needs of the widest range of people possible are being served.

3. Inspecting products

A. The CEO and COO will assure that all medical cannabis and medical cannabis products are lab testing for mold, mildew and chemical contamination. All medical cannabis and medical cannabis products will be tested for potency as well. The COO is responsible for selecting the laboratory responsible for testing; and also, for implementing the testing and record keeping system. The purchasing agent will oversee the transportation of all samples to the testing facility.

B. The CEO and COO will develop a system for the purchasing agent to use when inspecting medical cannabis and medical cannabis products. The purchasing agent will perform an organoleptic examination of all incoming flowers to check for:

- Smell (terpene profile; lack of mold or mildew smell)
- Color (green; not brown)
- Cleanliness (lack of visible mold or mildew)
- Size of buds
- Lack of stems and seeds
- Moisture content

C. Concentrates will also be examined for smell and visual appearance.

D. Packages and edibles will be examined for integrity and labeling and must include expiration dates, which will be recorded in the POS system by the purchasing agent.

4. Setting cost recovery price

A. The purchasing agent will set the cost recovery price offered for products by taking into account:

- Current market value
- Quality of the product
- Availability and need for the product
- Consistency of supply

B. The vendor will be informed by the purchasing agent that the price is contingent upon final test results, and that Urban Hills maintains the right of refusal or price adjustment upon receipt of test results.

C. In the event that the vendor offers test results, a decision will be made about acceptance based on the relationship with the provider (e.g. longevity of relationship, consistency of previous product testing results) by the purchasing agent.

5. Recordkeeping

A. The CEO and COO are responsible for creating a system to track all medical cannabis products as they arrive and are placed into inventory.

B. The purchasing agent will track each item as it is placed into inventory, and as the cost recovery prices are paid to vendors. Urban Hills will use a seed to sale inventory tracking system for this. The GM is responsible for ensuring this system functions on a daily basis and that all data is regularly reviewed, maintained and kept on file. The GM will be responsible for maintaining hard copies of all invoices and payments.

After Hours Storage of Medical Cannabis

Marin County Code Chapter 6.85.042, Section I2

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that all medical cannabis and medical cannabis products are stored safely and securely during after hours

Definitions:

None

Scope:

Safe Storage Room

Responsibilities:

Chief Executive Officer (CEO) - to develop systems to ensure the security of all medical cannabis products stored during non-operational hours

Chief Operations Officer (COO) - to implement systems to store and secure the medical cannabis during non-operational hours

General Manager - to oversee the placement of all medical cannabis products from the floor and into the safe storage room upon closure of the dispensary

Purchasing Agent - to help with the placement of all medical cannabis and medical cannabis products from the packaging area into the safe storage room during non-operational hours

Detailed Procedures:

1. Developing a system for safe storage
 - a. The CEO, with the assistance of the COO, will develop, install, and implement a system to assure that all medical cannabis and medical cannabis products are locked up during non-operational hours. This includes using safes that are both theft and fire proof, using vaulted rooms, and using full security systems including alarms, motion sensors and onsite or alarm response security.
2. Storage of medical cannabis in the vault
 - a. The General Manager, with the assistance of the Purchasing Agent and COO, will bring all medical cannabis and medical cannabis products from the floor and dispensing areas into the vault upon closure of the dispensary.
 - b. The CEO, COO or GM will lock the vault at the end of each day, and open the vault at the beginning of each day.
 - c. The purchasing agent is responsible for maintaining the vault inventory count.

Restrictions on Entry to Dispensary Department

Marin County Code Chapter 6.85.042, Section D7

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure only qualified medical cannabis patients and caregivers are permitted to enter the dispensing department

Definitions:

None

Scope:

Reception and Dispensary Room

Responsibilities:

Chief Executive Officer (CEO) - to create and implement a policy that assures only patients and caregivers are allowed access to the dispensary room

Chief Operations Officer (COO) - to implement the policy created by the CEO

Office Administrator - To ensure receptionist is diligent in the admittance and verification of members

Receptionist - To verify that only qualified patients and caregivers are admitted to dispensing area

Dispensary Patient Consultants - To re-check the I.D. of each member in order to verify their status before each transaction

Security - To assist in verifying that only qualified patients and caregivers are admitted to reception area and into the dispensing area from there

Detailed Procedures:

1. Creating a policy to allow only registered patients and caregivers into the dispensary room
 - a. The CEO will create and implement a policy to allow only registered patients and caregivers into the dispensary room. This includes status verification at the time of registration, recheck of registration at each visit, and a system of only buzzing qualified people into the dispensary room from the reception area.
 - b. The CEO will implement this policy, including creating a staff training program.
2. Intake, verification, and granting access to qualified patients and caregivers
 - a. The Receptionist will verify that each person is a valid and registered member, both upon initial registration and at each visit after that.
 - b. The Receptionist is to permit only those legally qualified and verified as current medical cannabis patients or caregivers to enter the dispensary room. Following verification the receptionist is to grant access to dispensing area by way of electronic buzzer entry system.
 - c. If the person does not have a valid patient recommendation, or if they are not a valid and registered caregiver, the person will be asked to leave the reception area by the receptionist. The person will be given information about how to become a legal patient or caregiver, and may be provided with general medical cannabis information. Security may assist with this.
3. Rechecking patient status in dispensary room
 - a. Dispensary Patient Consultants will check the identification of each member at the dispensary counter, in order to re-verify the each persons' status as a currently registered member.
 - b. If a person is found to have an expired card, they will be escorted from the dispensary by the Dispensary Patient Consultant, and advised to get an updated card before returning. Security may assist with this.
 - c. If a person with an expired card, or if someone enters the dispensary without a valid card, and this is due to staff error on the part of the Receptionist, the Receptionist will be given a written or verbal warning about their violation of this policy. Repeat violations will be grounds for termination.
4. Guests and visitors
 - a. The CEO will create a guest policy, stating that all other authorized visitors will remain in the designated outside waiting or parking area. The COO will implement this policy.
 - b. Security will monitor the outside waiting and parking areas to assure that guests and visitors do not create any nuisance crimes and do not present a risk for diversion of cannabis or another serious crime. If security feels threatened, they will call 911 immediately, and notify the CEO or other senior facility staff that a problem exists.

Ensure Proper Dosage and Use

Marin County Code Chapter 6.85.050, Section 13e

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure patient dosing is within doctor’s recommendations

Definitions:

None

Scope:

Dispensing Area, Reception

Responsibilities:

General Manager (GM) - To ensure professionalism in staff in regards to product effect and description

Receptionist - To make inquiries regarding doctor recommendation

Dispensary Patient Consultants - To make recommendations of dose and type of medicine

Detailed Procedures:

1. Ensuring appropriate doctor recommended product and use
 - a. The General Manager is to ensure complete diligence in keeping the dialog and vocabulary that’s used medical and professional at all times, discouraging all slang and recreational vocabulary
 - b. The Receptionist is to make appropriate inquiries as to what the patients doctor has recommended for them.
 - c. A Dispensary Patient Consultant is to make careful recommendations on dose and type of medicine based on the patients doctors recommendation and the feedback provided by patient

Attachments:

Method for ensuring that a qualified patient’s physician is not recommending cannabis for less than medically appropriate reasons.

Supervision of Dispensary Operations

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To properly supervise dispensary operations to assure patient safety, maximum efficiency, solvency, and adherence to all state and local regulations.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to creates policies; to keeps current with state and local regulations and adjusts policies as needed via the proper management team

Chief Operations Officer (COOO - to implement policies and supervise staff; to review inventory and finances and create monthly reports

Interim Controller - to supervise the dispensary’s inventory and finances

Office Administrator - to manage data entry and to assist with reconciliations

Purchasing Agent - to track all medical cannabis acquisitions and payments

General Manager -to implement policies in coordination with the COO; to oversee day-to-day operations making sure that the procedures are followed

Detailed Procedures:

1. Creating accounting and inventory management plans
 - a. The CEO and COO 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 Purchasing Agent, under the supervision of the COO, will purchase medical cannabis, entering all transactions onto inventory and financial tracking forms. These forms are provided to the Office Administrator each day, so that the data can be properly input into the point of sale system and financial accounting software.

- c. The Interim Controller will review all financial and inventory data weekly, investigating cash over/shorts, reconciling data, and correcting and training staff, as needed.
- d. All financial information will be sent to a bookkeeper, to review monthly, and to confirm all data is in balance. The COO will choose this bookkeeper, and will also hire an accountant for tax preparation.
- e. The CEO will review all financial data for the month, after is has been reconciled by the bookkeeper, in order to calculate taxes and to improve the dispensary’s operations. The CEO will also review financial data weekly, in order to catch errors and solve problems in their early stages. The CEO or COO may hire outside financial consultants, as needed, to assist with analysis or to help solve problems and improve systems. The CEO is responsible for updating the inventory and financial management plans, whenever needed, with the assistance of the COO.

Limits on Dispensing

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To establish and execute limits on medicines procured by patients in order to prevent diversion while meeting patients’ needs

Definitions:

None.

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create, approve and supervise this policy

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

General Manager (GM) – to train Reception and Dispensary Patient Consultants on this policy and supervise its implementation; to address any complaints from patients about the policy and authorize any variances to it, in coordination with the COO or CEO

Dispensary Patient Consultants – to enter into the point of sale system the amounts of medicine that a patient has purchased daily and to make sure they do not exceed their limit

Receptionist – to ensure that a patient does not enter the dispensary twice in one day; to make sure patients are aware of and agree to the policy upon signing up with the dispensary

Detailed Procedures:**1. Developing limits on dispensing policy**

- a. The CEO and COO —and after gathering input from dispensary members, the County regulators, and after reviewing data —will develop a policy limiting the amount of cannabis medicines that patients can purchase daily at the dispensary.
- b. This amount is currently capped at two ounces per visit and a maximum of 14 grams of concentrate. This amount will serve most patients for a two week to one-month period of time, but, as cannabis is self titrated, and methods of use vary. Each member needs a different amount for their needs, and some members may need to exceed this limit. The COO is responsible for setting rules for any exemptions to this rule, and the General Manager can approve them, on a per member basis.
- c. The COO will develop a program to train Security, Receptionists and Dispensary Patient Consultants to recognize and confront potential diversion of medical cannabis into the illicit marketplace.

2. Implementing limits on dispensing

- a. The General Manager will Receptionists and Dispensary Patient Consultants on this policy and supervise its implementation. They will assure that staff members use the point of sale tracking system for each transaction, capturing all sales data each time.
- b. The General Manager will address any complaints from patients about the policy and authorize any variances to it, in coordination with the COO.
- c. Dispensary Patient Consultants will enter in the amounts of cannabis medicine that a patient has purchased into the point of sale system. They will let the patient know that they may not exceed their limit, and will let members know if they have, denying the transaction, unless a variance is approved. The Dispensary Patient Consultant will alert the General Manager if a patient complains or has special needs.
- d. The Receptionist will check patient records at the start of each visit to check that the member is not visiting too often. They will let all members know that Urban Hills requests that members visit no more than once or twice a month, in general, and will inform members of limits on purchasing. If a member has been visiting too often, or attempts to visit more than once in the same day, the Receptionist will deny entry.
- e. All staff will be trained to deny service to any member who is violating the no diversion rule. This includes denying entry to anyone caught exchanging money with non-members in the parking area, those discussing purchasing for friends, or those who are purchasing more medical cannabis than applies to their own medical need.

Labeling of Cannabis Products

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To label all cannabis products in accordance with state law in a way that is clear, concise and accurate, and maximizes efficiency and inventory control.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy in accordance with California Medical Marijuana Regulation and Safety Act

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

Purchasing Agent - to oversee all packaging and labeling, in keeping with this policy

General Manager (GM) - to oversee day-to-day operations: to oversee the placement of all packaged and labeled products on the dispensing area

Dispensary Patient Consultants - to assist with packaging and labeling all products

Detailed Procedures:

1. Labeling packages of cannabis flowers

a. The Purchasing Agent will oversee the weighing of cannabis flowers and package it into 1/8 ounce or 1-gram tamper-evident packages, or into bags sealed so that they are tamper evident. Dispensary Patient Consultants will assist with packaging and labeling all products, and the General Manager is responsible for making sure each product is packaged and labeled to this standard, before reaching 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, strain name and date of harvest
- the net weight of the cannabis in the package
- 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."
- 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 Purchasing Agent will oversee the weighing of cannabis waxes and package it 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, strain name and date of manufacture
 - the net weight of the cannabis in the package
 - 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."
 - 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. To label packages of cannabis topical medicines

- a. The Purchasing Agent will oversee the weighing of cannabis shatters and package it in envelopes, and insert them into bags sealed so that they are tamper evident. The 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, strain name and date of manufacture
 - the net weight of the cannabis in the package
 - 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."

- 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

4. To label packages of cannabis edible products

a. The Manufacturing or Packaging Manager 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 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) 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

Attachments:

Photos of labels

Maintaining Sales Records

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To maintain all dispensary sales records in a manner that ensures maximum accuracy and efficiency, and follows all state and local regulations.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer - to create and supervise this policy, in coordination with Interim Controller and Chief Operations Officer (COO)

COO - to implement and supervise the entering and maintenance of sales data in the point of sale system by Dispensary Patient Consultants, in coordination with General Manager and IT Manager

Interim Controller - 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 accord with state and local regulations including keeping a general ledger of sales transactions

Office Administrator - to assist in maintaining records and to assist the COO and Controller

General Manager (GM) - to oversee day-to-day maintenance of sales records, including opening and closing procedures for backing up and storing sales records

Dispensary Patient Consultants - to enter data into the point of sale system in an accurate and complete manner

Detailed Procedures:**1. Implementing a point of sale tracking system**

- a. The CEO and COO will work the Interim Controller to choose a point of sale system. The COO will work with an IT consultant to install the system, and the COO and General Manager will both get trained on operations and on how to train others.
- b. The COO is responsible for keeping the point of sale system in working order and for contracting with the IT consultant as needed for repairs or updates.
- c. The COO, with the assistance of the Purchasing Agent and General Manager, will make sure each medical cannabis item is entered into the point of sale system when it is acquired, and that the unit will be transferred and recorded as grams and 1/8's, after processing. They are responsible for moving stock from the safe and into active dispensary stock, and updating the point of sale system to reflect this.
- d. The CEO, with the assistance of the COO and Interim Controller, will do an annual review of the system, assessing its viability and comparing other systems in the marketplace.

2. Maintaining sales records in the point of sale system

- a. The General Manager will train and supervise Dispensary Patient Consultants in proper entering and maintenance of sales records in the point of sale system.
- b. Each evening Dispensary Patient Consultants will print a record of the transactions they supervised, which will be provided to the General Manager, along with an accounting of their sales and any cash. Each morning, the General Manager will supervise a reconciliation system, looking for cash over/short issues, and solving them.
- c. Any Dispensary Patient Consultants not properly performing this function will be retrained, but failure to follow this policy will lead to termination.
- d. The Office Administrator will perform a double daily back up and storage of sales records. This will include using both a cloud based server and using an external thumb drive or hard drive. The COO will hire an IT consultant, to automate this function to the maximum.

Attachments:

None.

Properly Dispensing Cannabis to Patients

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To properly dispense cannabis medicines to patients in a way that ensures they receive the right strains and delivery methods in a timely manner, with maximum efficiency and accuracy

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

Purchasing Agent - to procure a variety of cannabis medicines to meet patient’s needs; to train the Dispensary Patient Consultants in assisting members in choosing the right medicines

General Manager (GM) - to 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 medicines used

Dispensary Patient Consultants – to consult with members about using cannabis as a medicine and to 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. The General Manager will train and supervise Dispensary Patient Consultants in the proper weighing and dispensing of cannabis medicines.
 - b. During each transaction, the Dispensary Patient Consultant will check to ensure that the product dispensed is properly labeled and is what the patient requested.
 - c. The Dispensary Patient Consultant will record the disbursement properly in the point of sale system, and will transact all payments properly.
 - d. The Dispensary Patient Consultant will stay focused on patient needs, with no side chatter between each about other topics while working the dispensary floor.
 - e. The Purchasing Agent will provide information about the products carried by the dispensary to the General Manager and Dispensary Patient Consultants, including coordinating training programs and gathering materials from suppliers.

2. To assist patients in choosing the right medicine
 - a. The General Manager, along with the Purchasing Agent, will train and supervise Dispensary Patient Consultants by acting as a peer counselor or coach/mentor, emphasizing kindness and empathy with patients
 - b. Each Dispensary Patient Consultant will be trained to describe the contents and effects of different cannabis medicines and delivery methods to members. The General Manager will be there during open hours to assist with questions, when needed.
 - c. The Dispensary Patient Consultant will gather and record information about the effects and side effects of medicines that patients are using and recommend changes. The General Manager will assist with this.
 - d. The General Manager 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

Posting Prices and Products

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To point of salet in a clear, readable 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:

Chief Executive Officer (CEO) - to create and supervise this policy

Chief Operations Officer (COO) - to implement and supervises this policy

Purchasing Agent - to implement this policy; to set prices on available products and communicate this information to website manager

General Manager (GM) - to keep records on all available products and communicate this information to the Purchasing Agent and Website Manager on a timely basis

Website and Social Media Manager - an outside service point of saleition that interfaces with the Purchasing Agent and General Manager about available products and their prices and to promote them in a timely manner

Detailed Procedures:

1. Posting prices and products to the menu
 - a. The COO will implement a system so that each product is listed on the online menu when it arrives into stock and it taken off when it is sold out. The Purchasing Agent will point of salet all items to the menu, upon entry into active stock. The General Manager will assist the Purchasing Agent with this. The General Manager will inform the Purchasing agent when any item goes out of stock, so that it can be removed.
 - b. The COO will implement a system to assure menus are available to review in the dispensary, either in print or in digital form. The Purchasing Agent, with the assistance of the General Manager, 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 COO is responsible for the creation of policies for point of sale items to the website and on social media. Social media policies will match the guidelines set forth by each service.
- b. The COO will hire an outside service provider to manage the website and social media, and the COO will determine which sites the collective will use for communicating with members.
- c. This Website and Social Media Manager is responsible for updating social media sites daily and for keeping the collective’s website up to date. The COO, Purchasing Agent and General Manager will offer content guidance, so that all current specials and promotions receive attention of these sites.

Sale of Non-Cannabis Products, Goods or Services

Marin County Code Chapter 6.85.042, Section H2-3

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To handle sales of non-cannabis items at the Dispensary in an efficient manner

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

Chief Operations Officer (COO) - to supervise the Purchasing Agent and General Manager in implementing this policy

Purchasing Agent - to research prices on available non-cannabis products and to choose items our members require; to set prices on available products and communicate this information to the General Manager; to receive and disburse non-cannabis items for sale

General Manager (GM) - to implementing this policy; to help determine which products non-cannabis products will be sold to best serve patients’ needs; to keep non-cannabis items stocked where they may be sold, marked with their prices; to assist patients with purchasing non-cannabis items

Dispensary Patient Consultants - to enter into the point of sale system all sales of non-cannabis items

Detailed Procedures:

1. Purchasing non-cannabis items for sale at the dispensary
 - a. The CEO will request that up to 150 square feet of the dispensary be authorized to display or sell devices for administration of medical cannabis. The CEO will create and supervise a policy to ensure that these items may only be sold to qualified patients or primary caregivers. The CEO 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 County Administrator to be in compliance with the County’s zoning code and any other applicable state or local regulations. This includes books, t-shirts, mugs, and other items with the Urban Hills logo or another medical cannabis insignia imprinted on it.
 - b. The COO will determine which products will be sold at the dispensary and communicate this information to the Purchasing Agent.
 - c. The Purchasing Agent will set the prices on the products that are purchased and communicate this information to the General Manager.

2. To make the purchased items available for sale at the dispensary
 - a. The Purchasing Agent will receive all shipments of non-cannabis items and disperse them to General Manager or store them in back stock.
 - b. The Purchasing Agent or General Manager will enter into the point of sale system the items received and their sales price.
 - c. The General Manager will keep non-cannabis items stocked in locked or unlocked cases on the floor, and at the service stations. They will mark the products with their prices as needed.
 - d. The General Manager and Dispensary Patient Consultants will assist patients with accessing non-cannabis 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-cannabis items at the dispensary
 - a. The Dispensary Patient Consultants or General Manager will enter into the point of sale system sales of non-cannabis items, taking the payment and giving change for each item.

Reviewing and Reporting Dispensing Errors

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To review and report any dispensing errors made by Dispensary Patient Consultants and or the General Manager and to immediately take any appropriate action

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to supervise this policy; to report errors to the COO; to address problems with Dispensary Patient Consultants

Interim Controller - to review all daily sales and report any potential dispensing errors to the COO and General Manager

Dispensary Patient Consultants - to properly utilize the point of sale system when dispensing cannabis

Detailed Procedures:

1. Reviewing dispensing errors

- a. The Interim Controller and General Manager will review each day's sales against inventory and report any discrepancies to the COO.
- b. The Interim Controller will work with the COO and General Manager to investigate, identify and solve any problems related to these errors.

2. Reporting dispensing errors

- a. The General Manager will report to the Interim Controller any dispensing errors that are noticed on the dispensary floor each day. The General Manager will work to repair any problems that result from this immediately, including retraining staff on point of sale procedures.
- b. The Interim Controller will use any information learned from these errors to improve the point of sale system to limit future mistakes.

3. Training and retraining staff

- a. The COO is responsible for creating point of sale training programs for staff. The General Manager will assist in implementing these trainings, assisting the staff in the dispensary as they learn this system.
- b. If a staff member makes an error, the General Manager is responsible for retraining them on the procedure
- c. If the error is serious or persistent, the General Manager will give the staff member a verbal or written warning, along with retraining them. Any staff member who consistently fails to properly use the point of sale system will be terminated.

Denial of Sale

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To deny sales of medical cannabis to any patient who does not qualify under state law or who has violated the dispensary code of conduct

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise this policy

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

General Manager (GM) - to supervise the day-to-day implementation of this policy; to train Receptionists, Security, and Dispensary Patient Consultants on the policy; to address problems and complaints about the policy

Receptionist - to deny service to anyone who is not a registered member of the collective, with an active medical cannabis recommendation

Dispensary Patient Consultant - to deny service to anyone who is not a registered member of the collective, with an active medical cannabis recommendation

Security - 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. Urban Hill’s right to refuse service

- a. The COO will supervise 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 COO 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 these rules.

2. Denying expired or unqualified patients or caregivers
 - a. The Receptionist will check the name of each patient or caregiver who enters the Dispensary in the database to make sure that they have a doctor's recommendation and that it is current.
 - b. The Receptionist will inform the patient if they do not qualify and how they can rectify the situation. They will instruct them that they must come back with a current recommendation.
 - b. Security will be on alert when a patient or caregiver is informed by the Receptionist that they may not purchase medicine that day. If necessary, they will politely and firmly escort the patient from the person and make sure 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 Receptionist or Patient Care Consultant will immediately report to the General Manager and/or Security 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 cannabis to another person, either on the premises or off site
 - stating that they intend to divert their medical cannabis to another person, or take it out of state
 - b. The General Manager will inform the patient or caregiver that they must leave the dispensary and cannot return that day, and will inform the Receptionist 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. The Security will politely and firmly escort the patient from the dispensary and make sure that they exit the parking lot in an orderly way. They will inform the other Security officers that the patient or caregiver may not enter the dispensary again that day.
4. Revoking a patient or caregiver's membership
 - a. The COO will supervise 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 General Manager will inform the patient or caregiver that their dispensary membership has been revoked and they may not purchase medicine there again. The General Manager will enter this information into the database, so that Receptionists can see this denial of entry.
 - c. If a person whose membership has been removed comes to the dispensary, the Receptionist will use the walkie-talkie to ask the General Manager to come forward and explain the denial of service to the person. The General Manager 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. The Security Agent will politely and firmly escort the patient from the dispensary and make sure that they exit the parking lot in an orderly way. They will inform the other Security officers 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

SECTION 5 Staffing Plan

Staffing Policy Disclaimer

Urban Hills staffing policies are intended to provide a basis for the management of its Human Capital initiatives in meeting the essential functions of the dispensary. These policies are not a substitute for the replacement of the advice of legal counsel. The organization reserves the right to change or modify its policies in order to comply with current local, state and federal guideline trends and legislative requirements. Urban Hills reserves the right to change policies for the legitimate needs of the business under the scope of the law. Nothing within these policies is meant to create a contract either implied or expressed between the employee and Urban Hills, nor will it remove the employers right to the employment " At-Will" doctrine.

Age Requirement for Staff

Procedure #: 1		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills will ensure that all personnel meet the minimum age requirement of 18 years old. It is unlawful for any licensee, operator or other person in charge of any dispensary to employ any person who is not at least 18 years of age

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM); Human Resources Representative

Detailed Procedures:

1. Procedure

- a. The GM will be responsible for interfacing with human resources to ensure that applicants and volunteers meet the minimum age requirement to work at a California cannabis dispensary. The CEO, as executive in chief, will remain ultimately responsible in ensuring that Urban Hills is compliant with all local, state and federal laws outlining privacy rights for all applicants and employees of the Urban Hills.

b. The human resources representative will be responsible for the completion of a complete and thorough background check for each employee hire and volunteer recruit to Urban Hills. This will be managed through processes that are compliant with local, state and federal guidelines governing pre-hire applicants. The human resources agent will keep information regarding the applicant confidential and will comply with all privacy laws and guidelines outlining the rights of applicants to Urban Hills. Background checks will minimally consist of: 1) county records criminal background check; 2), employment verification; and 3), social security report. The organizations ultimate goal is to perform due diligence to reduce or eliminate its negligence hiring liability.

Mandatory Criminal Background Checks

Procedure #: II		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

All Urban Hills staff will not have been convicted of a felony, or of a misdemeanor involving moral turpitude, or engaged in misconduct related to the qualifications, functions or duties of a licensee. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

General Manager (GM); Human Resources Representative

Detailed Procedures:

1. Procedure

a. The GM will be responsible for interfacing with human resources to complete background checks for all employees, which includes a background check for all additional hires. This will include a criminal background check that will research and report all misdemeanors and felonies. Upon discovery (or "hits"), the human resources agent and the COO will enter into an interactive discussion about the occurrence and the relation to the job. Risk assessment to the organization will also be assessed. The CEO will be remain ultimately responsible for to ensure that Urban Hills is compliant with all local, state and federal laws outlining privacy rights for all applicants and employees of the company.

b. The human resources representative will be responsible for the completion of a complete and thorough background check for each additional hire to Urban Hills. This will be completed expeditiously and the COO will be keep abreast of any delays to applicant processing. The Human Resources agent will keep information regarding the applicant confidential and will comply with all privacy laws and guidelines outlining the rights of any applicants to Urban Hills.

Minimum Staffing Levels

Procedure #: III		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To help ensure the efficient operation of the business and ensure suitable patient support, the Business will be considered to be at 100-percent staffing levels with the following staffing allocation: 1-Chief Executive Officer (CEO); 1-General Manager (GM);; 2-Purchasing Agents;; 2-Receptionists; 5-Dispensary Patient Consultants (DPC); Security Personal will be outsourced with 2 Security Guards on duty 60 minutes before opening and 60 minutes after the close of business. With the exception of the CEO & GM, all positions will be of the non-exempt classification

Definitions:

Non-exempt/Exempt Classification: Non-exempt employees are entitled to overtime pay under FLSA rules. Exempt employees are not.

Scope: This policy will apply to all employees and job classifications

Responsibilities: Chief Executive Officer (CEO); General Manager (GM)

Detailed Procedures:

1. Procedure

- a. The GM will have contingency plans in place to ensure adequate staffing during absenteeism and leaves of absence of employees. This will include allowing part-time employees to cover shifts and the cross training of employees to act in other capacities. Shift schedules will be designed so that employees receive adequate breaks. Urban Hills will always ensure that under no circumstances will there ever be fewer than four employees in the dispensary (not including security), with at least one person authorized to dispense medical cannabis during business hours. If an employee resigns, the GM will make it an immediate priority to begin a recruitment campaign for the soon-to-be vacant position. Security Services will be outsourced through an external agency that will provide targeted allocation of services at all times.
- b. The GM’s role will assume the responsibility of immediately notifying senior management of any known or potential vacancies with personnel in their operations.

Staff Training

Procedure #: IV		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills recognizes its responsibility to enhance the training and development of its employees to develop skills and abilities that will allow them to add value to the mission of the company. Staff will receive appropriate training for their intended duties to ensure their understanding of rules and procedures regarding dispensing in compliance with state and local law, and properly trained or professionally-hired security personnel

Definitions:

“HIPAA” (Health Insurance Portability and Accountability Act)

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO) - 1. Operations Manager: Will have principal oversight of training and will ensure 100-percent participation

General Manager (GM) - Will ensure that all employees regularly attend scheduled training and are trained in the following specialized areas: security & emergency procedures; dispensary operations; code of conduct; HIPAA compliance; customer service and emergency preparedness; cannabis strains and products and patient education.

Detailed Procedures:

1. Procedure

- a. The GM will ensure that staff is trained and that the training of each employee is recorded. This will be done via training log (or electronic record keeping) with the title/subject of the training, date, instructor’s name and signature (or acknowledgement of training if records are kept electronically) of the employee. Subject matter experts will be used to deliver training material to staff members. Annually, the leadership team of Urban Hills will meet to review training programs for staff and will give priority to mandatory training and initiatives that promote sound customer service value streams. Among training programs allotted to staff will include: regulation of membership, record keeping in compliance with California health and safety code governing dispensaries, HIPAA, SB 420, customer service and other relevant laws to dispensary operations.

Use of Volunteers

Procedure #: V		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

A Volunteer is considered to be a staff member over the age of 18, who without compensation or expectation of compensation beyond reimbursement performs a task at the direction of and on behalf of Urban Hills. Volunteers will not replace paid employees, but serve to supplement and enhance existing services to patients

Definitions:

None

Scope:

All volunteer recruits

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The volunteer program will be monitored and evaluated on an on-going basis by the CEO; with input from the GM periodically pertaining to the effectiveness and determination of the number of volunteers.
- b. The GM will manage the day-to-day workflow of all volunteers, including training and recording of hours. The GM will provide periodic evaluation on the performance of each volunteer. Thorough background checks and orientation sessions will be completed on all volunteers being provided tasks to complete.

Mandatory I.D. Badges

Procedure #: VI		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure the proper identification of members of Urban Hills while working at the business

Definitions:

After an employee has completed and submitted all necessary documents as a pre-condition to employment, they will be issued an official Urban Hills identification card. No employee will be allowed to work or continue to work without an I.D. badge. There will be no exception to this rule. If the card is lost or misplaced, the GM or COO will be immediately notified. This ID card will be “fully” visible to all times, and will be displayed by lanyard attached around the neck or clipped to the front of the employee

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

a. The GM will train the receptionist to check all staff for the required identification badge before being allowed to begin a shift at Urban Hills. No staff will be allowed to continue to perform daily responsibilities if no ID badge is present.

Maintenance of Employee Records

Procedure #: VII		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills will maintain a current register of the names of all employees currently employed by the dispensary, and will disclose such registration for inspection by any County officer or official for purposes of determining compliance with the requirements of this section

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The GM will be responsible for the stewardship and maintenance of all employee records. This will include the posting of all mandatory workplace notices to employees as required by local, state and federal law. The GM will enlist the assistance of the human resources representative as a subject matter expert who will facilitate systems of operation that will allow for the proper orientation and compliance of employee files and workplace compliance notices.
- b. The GM will ensure that all non-exempt employee records and performance reviews are properly completed and filed according to instructions and guidance proved by the Human Resources' Representative.

Attachments:

See guidelines for workplace notices for employees.

Notification to the Proper Authorities in changes in employee Status

Procedure #: VIII		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that notification regarding employment status is sent to the proper Marin County authorities

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The CEO will work with the COO to develop the proper procedures to notify the proper authorities in the event of a change in the status of an employee at Urban Hills.
- b. The GM will ensure that all processes promulgated by the CEO and the COO and published in the employee handbook are followed at all times. This will include keeping the proper records that detail the employment status of all staff.

Scheduling

Procedure #: IX		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills is committed to optimizing staff schedules in order to ensure that the operational needs of the dispensary; as well as, the individual needs of patients are being met

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The GM will coordinate the scheduling of Urban Hills staff. The GM, alongside the COO, will compose a comprehensive schedule detailing the shifts for each employee for the entire month. The GM will be responsible for approving all shifts and amendments to the schedule.

Hiring and Termination Plan

Procedure #: X		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

It is the policy of Urban Hills to ensure that employee hiring and termination of employment (either voluntary or involuntary) are handled in a professional manner, in compliance with all local, state and federal law

Definitions:

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. Employee Hiring: The GM will work with the human resources representation to provide strategic planning to source and make appropriate placement of individuals for job classifications at Urban Hills.
- b. Employee Termination: Once the GM has become aware of a pending employee termination, all efforts will be made to secure sound counsel from legal, or a human resources representative to ensure that all steps have been taken to reduce risk to the organization by ensuring that to the greatest degree possible the employees due process rights have been followed according to state and federal law, and that the actions taken by the organization allow it to stand on the best foundation possible in case of future pending litigation.

First Aid and Disaster Training

Procedure #: XI		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills will train all staff as to the proper safety procedures regarding a threat from smoke and/or fire. In accordance with OSHA standards, the GM will verbally communicate the fire prevention plan along with providing staff with a written document for their individual review. These measures are put into place to prevent further escalation of threatening events

Definitions:

None

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The GM will be responsible for overseeing all fire safety operations and, in consultation with the security, will ensure that staff is appropriately trained on all fire safety procedures. In accordance with OSHA standards, the GM will verbally communicate the fire prevention plan along with providing staff with a written document for their individual review.
- b. The GM will inform staff of the locations of all key surveillance equipment, panic buttons and fire alarms; and will ensure that the proper fire exit signage and contact information is at all times being properly displayed at the dispensary.

Managing Staff Breaks

Procedure #: XII		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that all non-exempt personnel are provided with allotted time for meal and rest breaks during the workday in accordance with State and Federal Law

Definitions:

FLSA: Fair Labor and Standards Act

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM);

Detailed Procedures:

1. Procedure

- a. The GM will ensure that all non-exempt personnel will take mandated rest and meal breaks as required under state law. This will include mandated record-keeping that requires employers to post official posters outlining the requirements of the FLSA and employee time and pay records. Non-exempt employees will be relieved of their duties by the supervising GM. If an employee finds that they have not been relieved of their duties in order to take a mandated rest or break period, he or she will immediately bring this to the attention of the GM. Any exception to this policy will immediately be brought to the attention of the COO for remedial action, such as in the case of a temporary staffing issue.

b. The GM will manage breaks for operational employees. This will include ensuring that they are relieved for rest periods.

Providing the Best Customer Service

Procedure #: XIII		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

Urban Hills will ensure that each employee and volunteer that interfaces with the general public, will be trained and conditioned to providing professional and above average customer service. This will be based on industry best practices and value-added service

Definitions:

“HIPAA”: Health Insurance Portability and Accounting Act

Scope:

All Urban Hills Employees and Volunteers

Responsibilities:

Chief Executive Officer (CEO); General Manager (GM)

Detailed Procedures:

1. Procedure

- a. All employees will attend and be engaged in regularly scheduled training on customer service, federal HIPAA compliance and code of conduct. All employees will bring to the attention of the GM, COO, or CFO, any situation of substandard customer service so that it can be immediately corrected.

- b. The COO will reserve the right to send any employee to any customer service training module that they so deem necessary in order to ensure that the specific employee has the necessary value-added customer service skills necessary to assist patients.

SECTION 6 Security Plan

Staff Training on Security Procedures

Marin County Code Chapter 6.85.042, Section M

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To actively engage staff in deterring and preventing unauthorized entrance into areas containing medical cannabis and theft of medical cannabis products at the dispensary; to ensure that staff is trained in emergency procedures to protect their own safety and the safety of the patients

Definitions:

None

Scope:

Facility-wide and within 200 feet of the entrance

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise the security training plans at the dispensary

Chief Operations Officer (COO) - to implement this policy, in coordination with Security

Security - to create, implement and supervise this policy, in coordination with COO

General Manager - to train staff on security procedures

Detailed Procedures:

1. Training staff on preventing unauthorized entry into the dispensary
 - a. COO, in coordination with security, will create educational materials and programs for staff on the dispensary's security procedures. These will include: restricting entry into the dispensing area to qualified patients and caregivers only; restricting entry into the procurement office, storage vault, packaging room and other staff-only areas (e.g. break room).

- b. Security will have co-responsibility, along with the GM and COO, for training staff on security procedures, including location and duties of security within the dispensary and in the parking lot. This includes procedures for alerting security to suspicious behavior or other incidents will be discussed and demonstrated.
- c. The COO and GM, in coordination with security, are responsible for training staff on security procedures, including opening and closing security procedures and day-to-day security procedures. Staff will be trained upon hiring by the COO and GM. Procedures will be reviewed by the COO at regular intervals and as needed when procedures change.

2. Training staff on emergency procedures

- a. The COO, in coordination with Security, will create educational materials and programs for staff on the dispensary’s emergency procedures. These will include: the use of alarms and panic buttons, evacuation of staff and patients and other procedures in case of an emergency.
- b. The COO will have responsibility for training security on security procedures and will oversee coordination between dispensary and security in case of an emergency.
- c. The COO and GM, in coordination with security, are responsible for training staff on emergency procedures, including the location and use of alarms and panic buttons and evacuation of staff and patients and other procedures in case of an emergency. Staff will be trained upon hiring. Procedures will be reviewed at regular intervals and as needed when procedures change.

Use of Alarms and Panic Buttons

Marin County Code Chapter 6.85.042, Section 18

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that the dispensary building is properly monitored to guard against and properly respond to any unauthorized entrance, theft, fire or other emergency

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise the security training plans at the dispensary

Chief Operations Officer (COO) - to create, implement and supervise this policy, in coordination with Security and GM

Security - to create, implement and supervise this policy, in coordination with COO

General Manager (GM) - to maintain day-to-day operations of security procedures and equipment

Detailed Procedures:

1. Installing and maintaining an alarm system and panic buttons

- a. The COO will oversee the installation, maintenance and operation of the building’s centrally monitored fire and burglar alarm system, following local, state and federal laws and securing the necessary permits. COO will contract with Alarm Monitoring Service that is properly licensed by the State of California Department of Consumer Affairs Bureau of Security and Investigative Services in accordance with California Business and Professions Code Section 7590 et seq., and whose agents are properly licensed and registered.
- b. COO is responsible for the procurement and deployment of panic buttons throughout the dispensary and parking lot.
- c. Security, in coordination with the COO, will supervise use of alarm system and panic buttons by both security and dispensary staff.
- d. The CEO, COO and the GM are responsible for setting the alarm each night upon closing and disabling the burglar alarm upon opening. The COO will regularly test and maintain the alarm system following manufacturer’s specifications and local, state and federal laws.
- e. If alarm is deployed, the CEO, COO, or GM will oversee staff and patient evacuation or other procedures.
- f. The COO is responsible for making sure the alarm monitoring service is responsible for offsite monitoring at all times and is alerted, along with police and fire departments, if the alarm is activated, so that it can take necessary steps to respond to the emergency. Use of Security Cameras

Use of Security Cameras

Marin County Code Chapter 6.85.042, Section I6

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that the dispensary building and parking lot is properly monitored to guard against any unauthorized entrance or theft.

Definitions:

None

Scope:

Facility-wide and with 200 feet of entrance to building

Responsibilities:

Chief Executive Officer (CEO) - to create a security plan that includes facility wide video surveillance

Chief Operations Officer (COO) - to implement and supervise this policy, in coordination with Security and to maintain day-to-day operations of security procedures and equipment

Security - supervise and maintain this policy, in coordination with COO, and to preview daily operations of video cameras

Detailed Procedures:

1. Installing and maintaining of security cameras
 - a. COO is responsible for supervising the installation, maintenance and operation of security cameras. COO will contract with licensed security camera monitoring service and ensure that security tapes are kept in a secure location for 30 days.
 - b. Security, in coordination with COO, will supervise use of security camera monitors by security staff, including coordination with dispensary staff.
 - c. The COO is responsible for day-to-day monitoring of security monitors. COO will regularly test and maintain the security cameras following manufacturer’s specifications and local, state and federal laws.
 - d. Security Camera Monitoring Service is responsible for offsite monitoring and storage of security tapes.

Supervision of a Detailed Security Plan

Marin County Code Chapter 6.85.050, Section F17

Marin County Code Chapter 6.85.061, Section I

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure that the Dispensary facility is properly monitored and that staff and Security personnel are trained to guard against any unauthorized entrance or theft and in how to handle emergencies

Definitions:

None

Scope:

Facility-wide and with 200 feet of entrance to building

Responsibilities:

Chief Executive Officer (CEO) – to create a detailed security plan and to monitor and update it as needed

Chief Operations Officer (COO) – to implement and supervise this policy in coordination with security

Security– to implement and supervise this policy, in coordination with the GM to report to the COO on the day-to-day operations of security procedures and equipment, to report any incidents and to recommend changes

Detailed Procedures:

1. Implementation and supervision of a detailed security plan

a. The COO will implement a detailed security plan including:

- Use and maintenance of outdoor lighting
- 24-hour deployment of Security Company personnel
- A detailed description of duties, including coordination with Dispensary management, neighbors and the County Sheriff's office
- Use, maintenance and monitoring of alarms, panic buttons and security cameras; 30-day storage of security camera footage
- Maintenance and deployment of radio communications
- Procedures for verifying patient or caregiver doctor's recommendations or state-issued ID cards and for ensuring that those documents are up to date
- Regulations on employee garments (no pockets allowed)
- Training on counting money, dispensing, weighing and packaging products so that those operations are observed and recorded by security cameras and managers
- Implementation and maintenance of a track and trace program that records the movement of medical cannabis and medical cannabis products in the dispensary's custody in such a way that records can be made available to government officials, upon request

2. Site plan security features

a. The CEO will design and the COO will implement a site plan, floor plan and security plan that have each incorporated features necessary to reduce potential crime-related problems at and near the dispensary. This includes:

- Security onsite
- Procedure for allowing entry
- Openness to surveillance
- Oversight of the premises, the perimeter and surrounding area's
- Reduction of opportunities for congregating and obstructing public ways and neighboring property
- Illumination of exterior areas
- Limiting furnishings and features that encourage loitering and nuisance behavior

b. Security, reception and the GM will work together with the COO to implement, enforce and improve these policies.

Maintenance and testing of security and fire safety systems

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To ensure all life safety equipment is regularly tested and is in working order and is compliant.

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to install working equipment and to supervise its operations and compliance

Chief Operations Officer (COO) - to implement systems and to regularly inspect and maintain each life safety system

General Manager - to notify the COO, if any maintenance is needed

Security - to regularly inspect all life safety systems, including alarms and fire safety systems for operational problems

Detailed Procedures:

1. Install working life safety systems

a. The CEO is responsible for supervising that security alarms and panic buttons are installed throughout the facility. This includes door and window alarms and panic buttons at security and reception areas and in the dispensary and administrative office. The COO will implement the security plan, ensuring each alarm is in place and functional at all times.

b. The CEO will supervise a fire alarm notification system to alert the fire department immediately in case of emergency. The COO will implement this fire safety plan and will make sure it is in place and functional at all times.

2. Testing and maintenance

a. The COO is responsible for supervising regular checks of the security and fire safety systems. They will work with the GM to manage a problem reporting system and to schedule any maintenance required for annual inspection of immediate repair.

b. The COO will establish a protocol for Security to use for daily, weekly and monthly inspections, in order to make sure the systems is fully functional and to get repairs ordered in a timely manner. All internal repair tickets will go directly to the GM, who will act to schedule repairs immediately, with copies provided to the COO for inspection and oversight.

3. Managing false alarms

a. The CEO will supervise a system to manage alarm or fire system malfunctions, with will be implemented by the COO. In the case of these malfunctions, police or the fire department are likely to arrive at the facility to determine that the alarm was false.

b. Any employee that discovers a false alarm must report this in writing to the COO and CEO. The CEO and COO are responsible for determining and identifying the cause of false alarm(s).

c. During a false alarm scenario, the police or fire department are likely to arrive. Upon noticing a panic button has been pushed on accident or that the alarm has gone off due to a malfunction, staff on duty will immediately phone the alarm company to let them know it is a false alarm. The alarm company will contact the police and may be able to avert an unnecessary service all. If police or fire department arrive, the senior staff member on duty will greet them outside and assure them that the facility is safe. They will likely want details about how the alarm was triggered.

d. All unnecessary service visits need to be written up in a report by the senior staff member for the CEO and COO. The reasons for the visit need investigated and any related problems need solved.

Window, door and perimeter checks

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To create a safe environment at the facility for staff and to ensure the security of all medical cannabis products

Definitions:

None

Scope:

Facility exterior and perimeter

Responsibilities:

Chief Executive Officer (CEO) - to establish a protocol for morning and evening external security checks

Chief Operations Officer (COO) - to implement this policy

Security - to perform morning and evening checks of every external door and window and to check the entire external perimeter of the facility for security risks

Detailed Procedures:

1. Creating and implementing a complete perimeter check policy
 - a. The CEO is responsible for implementing a morning and evening security check protocol. This will include that all external doors and windows be checked each morning and evening and that all security functions like the gate and lighting are in working order. The COO will implement and supervise this policy.

2. Daily implementation of external security checks
 - a. Each evening at closing time, security will check that all external doors and window are locked. If a door or window is found to broken, the repair needs implemented immediately. The staff will call a 24-hour repair service, and one other staff member will be required to stay at the facility to manage the repair.

 - b. Each morning, before staff enters the facility, Security will patrol the outside, checking that no intrusions were made through doors and windows the evening before. If there are signs of breaking and entering, the police will be immediately notified and staff will await their arrival to enter the facility. In case of this, the CEO and COO will be immediately notified after police, and either the CEO or COO will go to the facility to assist in any investigation or with needed repairs. General repairs will be reported to both the COO and GM, who will manage them in a timely manner.

 - c. Security will check the entire perimeter of the facility each morning and evening, looking for cuts to the fence, evidence of attempts to climb over, gate repair issues, broken lights and any other issue of concern. Any needed repairs will be reported to the GM and COO, who will schedule them based on importance.

Maintaining security when closed

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To assure the facility is secure during non-operational hours

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) – to establish a security protocol for non-operational hours

Chief Operations Officer (COO) – to implement the security protocol for non-operational hours

General Manager – to assist the COO with this security protocol

Security – to make sure the alarm is set each night at closing time and that it is disarmed in the morning

Detailed Procedures:

1. Establishing and implementing a security protocol for non-operational hours
 - a. The CEO will establish a protocol for off-hour security, including alarms on all doors and window, motion sensors, installing protective gates around the facility, night lighting and motion sensor lighting. The COO will implement these plans.
 - b. The CEO will hire an alarm response company or may chose to have security stationed at the facility overnight.
 - c. The CEO, with the assistance of the CEO and GM, will make sure all medicinal cannabis products are locked up at night.
2. Managing the daily operations of the overnight security plan
 - a. The COO is responsible for supervising the overnight security plan. This means that all security systems must be in working order, including lighting, locks and alarms each evening at closing time.
 - b. Staff will arm the alarm for the building each night, and will additionally be responsible for disarming the system in the morning.
 - c. Security will not be given the alarm codes, but will be on hand each morning and evening to establish that the system has been turned on and off, and to check all external doors and windows to make sure they are locked.
3. Alarm response
 - a. If the alarm goes off at night, the police will be notified by the alarm company to check the facility for signs of burglary or robbery. The CEO, COO, security or designated staff will also go to the facility, to meet the police and to help with the investigation of any breach.
 - b. If the alarm proves to be a false alarm, the reason needs fully investigated and solved. These false alarms are costly problems for the dispensary, as they come with fines.

Security during product deliveries

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To make sure all deliveries of medicinal cannabis are safe and secure

Definitions:

None

Scope:

Front Door and Administration

Responsibilities:

Chief Executive Officer (CEO) - to create a security protocol for safe deliveries

Chief Operations Officer (COO) - to implement this protocol

Interim Controller - to supervise payments to suppliers

Purchasing Agent - to ensure timely, organized and safe supply appointments

Receptionist - to educate vendors on rules and to assist with their safe entry and exit from the facility

Security - to create a safe environment inside and outside of the facility

Buyer—to oversee the purchasing of medical cannabis product inventory

Detailed Procedures:

1. Creating and implementing a vendor safety plan

a. The CEO will implement security protocol for every step of the vendor experience at Urban Hills. This will include creating rules explaining how to get an appointment with our buyer, as Urban Hills will not accept drop by suppliers; how to registration into our member system; rules for entry and exit; and guidelines for safe carry and transport. The COO will implement these policies, with the assistance of the GM and the receptionist.

b. The receptionist is responsible for educating potential vendors about Company policies when they arrive in person to register, or call the dispensary via phone. The COO will establish a site on the collective’s website to educate potential vendors rules and policies for this. The Urban Hills buyer will give further education to vendors, including tips on how to prevent attempted burglary or robbery.

2. Safe entry and exit for vendors

- a. Security will monitor the safety of the parking lot and the surrounding area within 200 feet. They will observe and report any suspicious activity to the senior staff member at the facility and to the police. The goal is to create a safe environment for vendors when they arrive with Urban Hills supply for medicinal cannabis.
- b. Vendors will park in the parking lot and not on surrounding streets. Their arrival will be timed such that appointments occur at low hours when member volume is low so that parking is most available.
- c. Security will monitor the parking lot during hours of these appointments knowing that vendors will be entering and exiting the facility.
- d. The receptionist will register each vendor and will make sure they understand all of the general rules of the facility and verifying that each has a verifiable state-registered medical cannabis card. Anyone not willing or able to meet these rules or requirements will be asked to leave immediately.

3. Safe supply appointments

- a. Each vendor will check in with security, showing a government-issued form of identification and a state-registered medical cannabis card or a physician's recommendation. The receptionist will check them in and will provide them with all information regarding building rules and vendor safety policies. Vendors will only be checked in for appointments if they have scheduled in advance. If vendors arrive requesting these appointments, the receptionist will assist in booking one for a future date.
- b. The buyer will retrieve vendors directly from the reception area, at the time of their pre-arranged appointment. They will be escorted to the buying area for their appointment and will be under the direct supervision of the buyer at all times during the appointment. When done, the buyer will escort them back to the reception area, where they can enter the dispensary.
- c. The buyer will have the GM, COO, or interim controller to assist the in securing cash and checks for vendor payments. These systems require layers of checks and balances, starting with oversight of two people for payments over \$300. The CEO will establish this payment system, and the COO will implement it.

4. Security's role in securing product deliveries

- a. Security must be extra vigilant securing the safety of the Urban Hills product suppliers. Most arrive with products and leave with cash payments, meaning they are vulnerable to robbery and burglary both coming and going. Security must use their sense to observe, report and interrupt any potential crime issue. Each will be armed with an individual panic button to immediately notify the police in case of emergency.
- b. If Security assesses a risk, police will be immediately notified. This can be by pressing the silent alarm, phoning 911 from a landline (response can be delayed by use of cell phone for this), or by calling the non-emergency number. If police are called the CEO and COO will be notified immediately. The CEO and COO will assess and determine the next course of action.

5. Reacting to robbery and active shooting

a. If there is an active shooter at Urban Hills the following protocol will be followed by staff: run; if possible, hide; and if not, commit to your action and fight. Obviously, no one wants to consider this possibility, but being prepared with an action plan is essential. Call 911 at the first safe opportunity, using the panic buttons, landlines (preferable) or cell phones.

b. If there is a robbery in progress at Urban Hills comply and give the suspect what they want. Never argue or fight and call 911 at the first safe opportunity. Use panic buttons, landlines or cell phones (although this will delay response).

Loitering - inside and out

Procedure #:		
Approved By:	Approval Date:	Effective Date:
Revision Approved By:	Revision Approval Date:	Revision Effective Date:

Purpose:

To prevent nuisance and crime, both inside and outside of the facility

Definitions:

None

Scope:

Facility-wide

Responsibilities:

Chief Executive Officer (CEO) - to create and supervise and anti-loitering policy

Chief Operations Officer (COO) - to implement the anti-loitering policy

General Manager - to make sure members move through the facility in a timely manner and do not linger inside after visits

Receptionist - to implementing the no loitering policy in the lobby

Dispensary Patient Consultants - to implement the no loitering policy in the dispensary room

Security - to keep the parking lot and entryway free of loitering and to assist in removing any member who is lingering inside the facility

Detailed Procedures:**1. Creating and supervising this policy**

- a. The CEO is responsible for creating safety and security plans to eliminate loitering inside and outside. The COO will implement these policies and will train security, the receptionist, the GM and dispensary patient consultants to prevent, intercept and address loitering issues.
- b. The COO will create a reporting program to track any members who linger at or around the facility and will be responsible for creating nuisance and security risk reports. Any staff member who sees a repeat loiterer will report this person using the tracking system. The COO will reserve the right to ban members that pose a continued threat or nuisance to the dispensary.
- c. The COO will supervise any disciplinary actions that need to be taken regarding a member who is loitering around or inside of the facility. A warning by security, or another trained staff, about the fact that this is a crime, and that we are mandated to prevent it, is generally enough to stop most people from repeating the behavior. But, sometimes, it may be required to revoke a member's membership for this. Only the COO can approve this action, and only after a complete review of circumstances.

2. Implementing the policy inside the facility

- a. The receptionist, dispensary patient consultants and the GM will aim to give each member their full attention. Interactions at the dispensary should be limited to approximately 10-minutes. Members will arrive, get their medicine and leave, all in a timely manner. If any member is lingering either before coming in or after leaving, they pose a safety risk to the collective. This could be the set up to a crime or could be a confused member needing assistance.
- b. If the member is in need of medical attention, staff will call 911 immediately. If you are on a radio communications, but not by a phone, radio for the Receptionist to make the call, keeping the radio free for relay of questions from emergency dispatch. Stay with the member until help arrives.
- c. If you suspect a crime in progress, push the panic button or use your radio to communicate and ask either the administrator or receptionist to call 911 immediately.
- d. All internal loitering issues need to be recorded, reported by the staff members involved to the COO and tracked on the member's digital records. Repeat violations will result in denial of services, which will be issued at the discretion of the COO.

3. Implementing the policy outside of the facility

- a. If any member is loitering in the parking lot or nearby, either before coming in or after leaving, they pose a safety risk to the collective. This could be the set up to a crime or could be a confused member needing assistance. In these circumstances, Security needs to intercede and will clear the area in a timely manner.
- b. If the member is in need of medical attention, security will contact 911 immediately from a landline. If the employee is on radio communications, but not by a phone, the employee will radio for the receptionist or administrator to make the call, keeping the radio free for relay of questions from emergency dispatch. Stay with the member, until help arrives.

- c. If you suspect a crime in progress, staff will push the panic button or use radio communicators to request the administrator or receptionist call 911.
- d. All internal loitering issues need to be recorded by security, reported to the COO and tracked on the member's digital records. Repeat violations will result in denial of services, which will be issued at the discretion of the COO.

SECTION 7

Employee Handbook

Welcome

Dear Urban Hills Team Member,

Welcome to Urban Hills Dispensary. I want to personally let you know that we are delighted that you are joining us and that your role is critical in fulfilling Urban Hills' mission. That mission is to help create a national culture dedicated to the cultivation of organic, clean medicine for medical cannabis patients. I believe that as the demand for medical cannabis continues to grow, more and more universities, research institutions, and the general public will continue to learn more about its healing properties and applications.

Urban Hills strives to lead the industry by providing to our patient members only the highest quality products and most knowledgeable, courteous staff. Thank you in advance for your commitment to this endeavor.

During your new employee orientation, your supervisor will review our organizational values and employee manual. Together we will move forward in our mission of service to the community.

This handbook will introduce you to our policies and workplace guidelines. It is important that you read it promptly and that you have a complete understanding of its contents. The handbook is not an agreement or contract of employment, express or implied.

Urban Hills reserves the right, at its sole discretion, to change, supplement, add, subtract, or deviate from the provisions of this handbook, except as required by law, and except for the rights of the parties to terminate employment at-will, which may only be modified by an express written agreement signed by you and the management of Urban Hills. As policies and provisions change, updated pages will be distributed to you for supplementing your handbook.

If you have any questions, please do not hesitate to speak with your supervisor or for clarification.

Thank you for joining Urban Hills and we look forward your contributions to our organization and the patients that we serve.

My Warmest Regards,
Dustin Pebbles

“At-Will” Employment Status

Your employment with Urban Hills Dispensary is a voluntary one, and is subject to termination by you or the management of Urban Hills Dispensary with or without cause, and with or without notice, at any time. Nothing in these policies shall be interpreted to be in conflict with or to eliminate or modify in any way the employment-at-will policy of Urban Hills Dispensary employees.

This policy of employment-at-will may not be modified by any member of management or employee and shall not be modified in any publication or document. The only exception to this policy is a written employment agreement approved at the discretion of the Management of Urban Hills Dispensary. These personnel policies are not intended to be a contract of employment or a legal document.

Urban Hills Dispensary reserves the right to sever the employment relationship, with or without notice, reason, or cause.

Further, Urban Hills Dispensary has the right to manage its workforce and direct its employees. This includes the right to hire, transfer, promote, demote, reclassify, lay-off, terminate, or change any term or condition of employment at any time, with or without a reason and with or without notice unless otherwise required by law.

Our Organization

Services

Urban Hills Dispensary is organized to provide and protect safe access to affordable cannabis medicines. We serve legally qualified patients suffering from AIDS, cancer, glaucoma, multiple sclerosis, chronic pain, and other serious illnesses.

We operate in full compliance with the letter and the spirit of California’s medical cannabis laws. Urban Hills Dispensary provides quality-controlled medication only to our registered members in an environment that is safe, comfortable, and professional. Urban Hills Dispensary adheres to the highest possible standards of compassion and legal integrity.

Orientation

Your supervisor or designee will conduct an orientation session consisting of a tour of the facility and an explanation of the programs, operations, and personnel policies. You will also be shown where we have posted general information for employees with regards to wage and hour laws, and other information that we are required to have on display for our employees. We encourage employees to ask questions about the guidelines that govern the employment relationship with Urban Hills Dispensary.

Reporting Structure

Management

Your Supervisor is responsible for scheduling breaks, training and coaching daily staff, managing inventory, ordering supplies, and other tasks. You will report to the Supervisor for direction regarding your work.

Employees

All other employees, including (But not limited to) Receptionist and Bud Tenders, make up the non-exempt employee base. Vendors and Independent Contract employees are not included as employees of Urban Hills Dispensary; however, everyone is expected to be guided by the same goals and general care for our patients. Because we feel that performance feedback is essential to growth, as well as the good health of the organization, all employees will be given annual performance reviews in addition to daily coaching from their Supervisor.

Exempt and Nonexempt Employees

Your entitlement to earn overtime pay depends on whether you are classified as an exempt or nonexempt employee. Exempt employees are those who do not earn overtime because they are exempt from the overtime provisions of the Federal Fair Labor Standards Act and applicable laws. Non-exempt employees are those who meet the criteria for being covered by the overtime provisions of the Federal Fair Labor Standards Act and applicable state laws. If you are uncertain about which category you fall into, please reference to your initial employment offer letter, or/and speak to a member of management. Part-Time Employees: Place information on Part-time- employees here, (i.e. max hours, etc)

New Employee Documents & General Information

As required by State and Federal laws and guidelines, we will supply you with documents and informational packets as a newly hired employee. This information includes Sexual Harassment Handout (DFEH-185), California Family Rights Acts (DFEH-188), Disability Insurance Pamphlet (DE-2515), Employee Rights under Workers ' Compensation, Paid Family Leave Brochure (DE- 2511), Personal Physician/Chiropractor Form. Other forms and information include the information below:

Proof of Work/Employment Eligibility

On your first day of work, you must complete Federal Form I-9, and show us documentation proving your identity and your edibility to work in the United States. This is in compliance with federal government guidelines. If you have worked for Urban Hills Dispensary previously, you need only provide this information if it has been more than three years since you last completed an I-9 Form for us or if your current I-9 Form is no longer valid.

If the appropriate documentation is not available, application for documents and a receipt of that application from the appropriate government agency is required within three working days of hire. An employee has a limited number of days to produce the document(s). If the appropriate documentation is not received within that period, employment will be terminated.

Child Support Reporting Requirements

Federal and state laws require us to report basic information about new employees, including your name, address, and Social Security number, to a state agency called the State Directory of New Hires. The state collects this information to enforce child support orders. If the state determines that you owe child support, it will send us an order requiring us to withhold money from your paycheck to pay your child support obligations.

Payroll Documents

In addition to the documents above, you will be asked to complete paperwork and forms that will allow us to pay you in a timely fashion, and ensure that we are in compliance with wage and hour laws with respect to your position. Included in these documents are State and Federal Tax forms.

Proof of Medical Recommendation

As a condition of employment, all employees must have a current medical recommendation for cannabis to work at this dispensary. It is our goal to comply with all local, state, and federal laws to the greatest degree possible. To date, this requirement allows Urban Hills Dispensary to operate in this location, and service our clients.

Meal and Rest Breaks

Employees are should take at least a 10 minutes break for every 4 hours worked. Generally, this can be taken in the middle of the 4 hour block. In addition, employees who work at least 5 hours in a day are entitled to take at least a 30 minute meal/rest break. These breaks are mandatory. Meal breaks are generally unpaid. However, employees who are required to work or remain at their stations during the meal break will be paid for that time. No employee should work through their meal breaks without expressed knowledge and approval from their manager. There will be no exceptions to this rule.

Overtime

Periodically, we may ask employees to work beyond their regular scheduled hours. If our business necessitates this action, it is our expectation that you adjust your schedule to help accommodate this job requirement.

We will try to give employees advance notice when overtime work is necessary; however it will not always be possible to notify employees in advance. Exempt employees will not be paid for working beyond their regular schedule hours. Nonexempt employees are entitled to payment for overtime, according to the rules set forth below:

All overtime work must be approved, in advance by your supervisor. Working overtime without permission is a violation of our company guidelines and my result in disciplinary action.

Nonexempt employees will be paid 1 $\frac{1}{2}$ times their regular hourly rate for every hour worked in accordance with California State, and Federal guidelines. Pay Warrants Employees are paid bi-weekly. If a payday falls on a holiday, you will receive your paycheck by the last workday immediately before payday. Please ensure that all time keeping records are submitted on-time for timely and accurate pay checks. Urban Hills Dispensary does not allow employees to receive pay advances for any reason. Payroll Deductions Your paycheck reflects your total earnings for the pay period, as well as any mandatory or voluntary deductions from your paycheck. Mandatory deductions are deductions that we are legally required to take. Such deductions include federal and state income taxes. Voluntary deductions are deductions that you have authorized. If you have any questions about your deductions, or wish to change your federal withholdings form, please contact our payroll representative.

Wage Garnishments

A wage garnishment is an order from a court of government agency directing us to withhold a certain amount of money from an employee's paycheck and send it to a person or agency. Wages can be garnished

to pay child support, spousal support or alimony, tax debts, outstanding student loans, or money owed as a result of a judgment in a civil lawsuit. If we are instructed by a court or agency to garnish an employee's wages, the employee will be notified of the garnishment at once. Please note that we are legally required to comply with these orders. If you dispute or have concerns about the amount of a garnishment, you must contact the court or agency that issued the order.

Benefits

At this time, Urban Hills Dispensary is unable to offer benefits other than what is required by local, state, and federal law.

State Disability Insurance

If an employee suffers an illness or injury outside of the workplace that prevents the employee from working and earning income, he or she may be eligible for State Disability Insurance. If this happens to you, state disability insurance may provide you with a percentage of your salary while you are unable to work. All employees are eligible for this coverage and pay for it through deductions from their paychecks. To find out more about state disability insurance, please refer to www.edd.ca.gov, specifically,

"Notice to Employees: Unemployment Insurance/Disability Insurance Benefits" (DE 1857A) - Advises employees of their right to claim Unemployment Insurance (UI), DI, and PFL benefits.

"State Disability Insurance Provisions" (DE 2515) - For new hires and again when the employee notifies the employer they need to take time off from work due to their non-industrial medical condition.

"Paid Family Leave insurance program" (DE 2511) - For new hires and again when the employee notifies the employer they need to take time off from work to care for a seriously ill family member or to bond with a new child.

Workers Compensation

If you suffer from an illness or injury that is related to your work, you may be eligible for worker's compensation benefits. Workers' compensation will pay for medical care and lost wages resulting from job-related illnesses or injuries. If you are injured or become ill through work, please inform your supervisor immediately regardless of how minor the injury or illness might be.

If you are unable to work because of an illness or injury that is not related to work, then you might be eligible for state disability insurance instead of workers' compensation.

To find out more about workers' compensation coverage, please feel free to visit the state of California website at www.edd.ca.gov, or contact your supervisor.

Unemployment Insurance

If your employment with Urban Hills Dispensary ends, you may be eligible for unemployment benefits. These benefits provide you with a percentage of your wages while you are unemployed and looking for work. To find out more about workers' compensation coverage, please feel free to visit the state of California website at www.edd.ca.gov, or contact your supervisor.

Fair Employment Practices

Equal Employment Opportunity Policy

Urban Hills Dispensary is committed to equal employment opportunities and does not discriminate against qualified employees or applicants because of race, color, ethnicity, religion, sex, sexual orientation, gender identity, pregnancy, childbirth or related medical conditions, national origin, ancestry, citizenship, age, veteran status, marital status, physical disability, mental disability, medical condition, political activity or any other characteristic protected by local, state, or federal law.

Equal employment opportunity will be extended to all persons in all aspects of the employer- employee relationship even where not otherwise expressly mentioned in this handbook, including but not limited to recruitment, hiring, upgrading, training, promotion, transfer, discipline, layoff, recall, and termination. Urban Hills Dispensary policy prohibits harassment of applicants or employees related to these issues.

Reasonable Accommodations for Persons with Disabilities

Urban Hills Dispensary complies with the Americans for Disabilities Act and applicable state and local laws providing for nondiscrimination in employment against qualified individuals with disabilities. In addition, individuals with a disability who use or are accompanied by guide dogs, signal dogs, or service dogs are protected classes in California.

Urban Hills Dispensary intends to provide reasonable accommodation in the hiring, placement, and advancement of employees with disabilities, and intends to seek out those with disabilities, who can, with or without reasonable accommodation, perform essential functions of the job. We encourage employees and other sources to recommend for employment individuals with disabilities whom they believe can, with or without reasonable accommodations, perform the job function.

An applicant or employee who believes they need a reasonable accommodation of a disability should discuss the need with his or her supervisor.

Reporting Procedures for EEOC Claims

An employee should address informal complaints related to Equal Employment Opportunity Commission (EEOC) guidelines with their Supervisor, or a Urban Hills Dispensary' member of management.

Management will maintain as much confidentiality as possible while performing a thorough investigation. Action will be taken as deemed appropriate, including but not limited to disciplinary action or termination when appropriate.

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims.

Anti-Harassment Policy

In keeping with the spirit and the intent of federal and state law, Urban Hills Dispensary strives to provide a comfortable work environment free of discrimination and harassment. Urban Hills Dispensary strictly prohibits all forms of harassment, including sexual harassment and harassment based on race, color, sex, sexual orientation, religion, national origin, age, religious creed, gender identity, marital status, medical condition, disability, military service, pregnancy, childbirth and related medical conditions, or any other characteristic protected by local, state or federal law. Urban Hills Dispensary is committed to taking all reasonable steps to prevent harassment from occurring.

The following is a partial list of examples of activity that are always considered inappropriate for the workplace, and thus are prohibited here at Urban Hills Dispensary:

- Making unwelcome sexual advances, telling sexually explicit jokes;
- Making or threatening reprisals after a negative response to sexual advances
- Using epithets, or slurs;
- Making derogatory comments about an employee's body or dress;
- Making verbal sexual advances or propositions or repeated requests for dates;
- Leering; making sexual, obscene, or vulgar gestures; or displaying sexually suggestive or derogatory objects, pictures, cartoons, drawings, or posters;
- Sending sexually explicit e-mails or voicemails;
- Initiating uninvited touching of a sexual nature;
- Making unwelcome sexually-related comments;
- Making conversation about one's own or someone else's sex life;
- Taking actions or making comments consistently targeted at only one gender, even if the content is not sexual;
- Teasing or taking other actions directed toward a person because of the person's gender
- Touching, assaulting, impeding or blocking movements;
- Making requests for sexual favors or demands for sexual favors in exchange for favorable treatment;

Any of the above conduct, or other offensive conduct directed at individuals because of their sex, race, color, religion, national origin, pregnancy, age, marital status, disability, military status or any other characteristic protected by law, is prohibited. All such conduct is unacceptable in the workplace and in any work-related settings such as business trips and business-related social functions, regardless of whether the conduct is engaged in by a supervisor, coworker, client, customer, vendor, or other third party.

Please also refer to the attached Sexual Harassment Brochure from the Department of Fair Employment and Housing. Reporting Procedure for Protected Classes Any employee who believes that they or a coworker have been the victim of harassment has a responsibility to immediately report the incident and the names of the persons involved to a Supervisor, or member of Management. All incidents reported will be investigated. Harassment cannot be remedied if not reported. Therefore, the employee's immediate reporting and cooperation is crucial. Urban Hills Dispensary will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible consistent with a thorough investigation.

Urban Hills Dispensary takes complaints of discrimination and harassment very seriously. Thus, there is no need to follow any formal chain of command when making a report. However, if the employee files a report under this policy and has not received a satisfactory response within 10 business days, they should immediately contact a member of Management.

Every Supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally discussed, must immediately report the issues raised to the owner of Urban Hills Dispensary in person, by phone, or by e-mail.

Investigation and Findings

Urban Hills Dispensary will promptly investigate the facts and circumstances of any claim of harassment or wrong doings in the workplace. Urban Hills Dispensary generally will interview the complainant and the alleged harasser; conduct further interviews as necessary; document findings regarding the complaint; document recommended follow-up actions and remedies, if warranted; and inform the complainant and others involved of the findings.

Upon completion of the investigation, any employee, including any supervisor or manager, who is found to have engaged in prohibited harassment is subject to disciplinary action up to and including discharge from employment. An employee who engages in harassment can be held personally liable for monetary damages should a lawsuit be filed by the person(s) experiencing the unsanctioned behavior. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

Protection against Retaliation

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation against any employee for reporting, filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by Urban Hills Dispensary or a federal or state enforcement agency. Employees should immediately report any retaliation to a Shift Supervisor or member of Management. Any complaint will be immediately, objectively, and thoroughly investigated in accordance with the investigation procedure outlined above. Anyone, regardless of position or title, whom Urban Hills Dispensary determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination.

General Work Practices

Employment Classifications

Employment classification is based on an employee's job description and on the nature of the position, consistent with the Fair Labor Standards Act and all applicable California laws. Employee classifications determine how an employee is paid, their eligibility for overtime pay, and the benefits to which they are entitled. These classifications are not, nor should they be considered to be, an agreement or contract of employment, express or implied, or a promise of treatment in any particular manner at any given time. An employee is classified as either exempt or non-exempt, based on the position and the type of work performed.

Exempt employees are all those who are classified as exempt from the overtime provisions of the Federal Fair Labor Standards Act and California law. Exempt employees shall receive salary pay for the workweek cycle.

Non-exempt employees include all employees who are covered by the overtime provisions of the Federal Fair Labor Standards Act and California law. Only non-exempt employees are entitled to receive overtime pay for hours they work in excess of 40 hours in a workweek.

Temporary and contract workers are hired for specific purposes, temporary in nature, and compensation is agreed upon at the time of hire. These employees are not eligible for benefits of regular employees.

Time-Reporting Policies

Facility Hours

Urban Hills Dispensary is open to the public from 10:00 AM to 8:00 PM, Monday through Sunday. These hours may occasionally vary for reasons such as special events or meetings. Your manager will determine your specific work schedule based on the needs of the company.

Business closing procedures and responsibilities will be assigned to specific employees.

Additionally, there are occasional meetings and trainings that are required for all employees. You will be compensated for hours worked should these meetings fall outside of your normally scheduled hours.

Time Cards/Work Hour Recording

All employees are expected to follow pre-described guidelines for clocking in and out for each shift they work. In the event that you as an employee are presented with a problem that would prevent you from following those guidelines, you must notify your manager as soon as reasonably possible.

Employees are responsible for recording all breaks, meal periods, beginning and end work times. If an employee fails to keep a written record of his or her starting, quitting or meal period times, the employee should notify their Supervisor promptly.

Employees may only record starting and quitting times on their own time cards. Doing so for other employees, or falsifying time records, may lead to discipline, up to and including termination.

Overtime

Overtime is any work beyond the normal 8-hour workday or 40-hour workweek. It must be authorized in advance by your Shift Supervisor or member of Management and under the following circumstances:

- Extra work shifts need filled due to employee absences, illnesses, or vacations;
- Holiday work or special events;
- Situations that demand immediate attention.

Overtime work is paid to non-exempt employees according to federal and state law.

Staff Scheduling

Your General Manager is responsible for all issues related to employee scheduling. The weekly work schedule is made each week and is normally posted on or before Wednesday. Scheduling of shift work is based on employee availability and the needs of Urban Hills Dispensary. Employees are scheduled on various days as needed.

Requesting time off

Management will attempt to grant as many requests as possible, which is generally never more than one or two per day. Not all requests can be granted, as sufficient staff must be available to meet operating needs. Requests will generally be granted in the order they are submitted.

Always check the weekly schedule promptly and notify your Supervisor of any mistakes or omissions. This schedule is complex to prepare, and each employee plays an important role in identifying problems. It is absolutely essential that each employee does a complete check of the schedule each week.

Good attendance for all employees is essential to our ability to grant time off. Working your assigned shifts without calling in sick and encouraging coworkers to do the same, allows Urban Hills Dispensary to approve the maximum number of requests. Attendance and Absenteeism Dependability, punctuality, and regular attendance are essential at all times to the proper operation of Urban Hills Dispensary. If an employee expects to be late or absent from work for any reason, it is required that the shift Supervisor be contacted *no later than one hour before* the scheduled starting time. This policy applies to each day of absence. Leaving a voice mail message is not considered an adequate method of notifying your manager of an illness. In the event the illness persists, employees must again notify the shift supervisor. Employees will be asked to submit a doctor's note if absent more than three consecutive work days. Failure to show for work for more than three consecutive shifts will be considered a voluntarily resignation on behalf of the employee.

An absence is defined as a failure to report to work as scheduled. When a sick or injured employee cannot come to work, Urban Hills Dispensary will need notification so that we can cover your position properly.

Excessive absences and failures to report absences on time will lead to disciplinary action, up to and including discharge. Absences can also be considered excessive if they occur frequently or show a pattern of abuse and are approved in advance. Absences immediately before or after holidays, days off, and weekends are suspect. The need for disciplinary action for excessive absences will be evaluated on a case-by-case basis.

Tardiness

An employee must arrive at the work site and be ready to start work promptly at the beginning of their assigned shift. Work must resume on time after authorized rest and meal periods. Since traffic or weather conditions can cause tardiness, an employee is expected to allow extra time to commute to work, if necessary.

Repeated or excessive tardiness will lead to disciplinary action. Tardiness is excessive if an employee is frequently or unnecessarily late, or if a pattern of tardiness develops.

Each disciplinary action will be determined and implemented by Urban Hills Dispensary. This may include oral warnings and periods of probation. Repeat abuses of this policy will result in discharge.

Compensation Related Policies

Paydays

Employees are paid bi-weekly. This varies for holidays and under other occasional special circumstances. If a payday falls on a holiday, employees will be paid the day before.

It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure that you are paid properly and that no improper deductions are made, you must review your pay stubs promptly to identify and report all errors. If you believe you have been subject to any improper deductions, you should immediately report the matter to your Supervisor.

If you believe a mistake has occurred or if you have any questions, please notify your Supervisor promptly.

Employment and Salary Verification

In response to a prospective employer's request for information regarding a current or former employee's employment history, the Supervisor will furnish only an employee's name, dates of employment, job title. This is only done with the employee's written authorization or expresses oral consent. We will not, under any circumstances, provide an employee's home phone number or address unless specifically requested in writing by the employee that we do so, or unless we are required to do so by law.

Wage and Salary Increases

Wage and salary increase requests should be directed to the owner of Urban Hills Dispensary. These will be evaluated, and if granted, they will become effective when most appropriate to the organization. An evaluation will be based on length of employment, changes in job description, performance evaluations, and the employee's on-the-job performance. A good performance review neither guarantees a raise nor promises continued employment.

Exempt Employees

Exempt salaried employees receive a salary that is intended to compensate them for all hours they work. This salary will be established at the time of hire or when a non-exempt employee becomes classified as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work you perform.

Under state law, an exempt employee's salary is subject to certain deductions. For example, an exempt employee's salary can be reduced for the following reasons:

- full-day absences for personal reasons
- full-day absences for sickness or disability, if you have exhausted the paid sick leave available to you
- intermittent absences, including partial-day absences, covered by the federal Family and Medical Leave Act, if you have exhausted other paid leave available to you
- to offset amounts received as payment for jury and witness fees or military pay
- during the first or last week of employment in the event you work less than a full week
- any workweek in which you perform no work for the Company

Expenses and Purchases

Your Supervisor must preauthorize all expenses and purchases of supplies and equipment for Urban Hills Dispensary. In addition, all personal use of employee's personal goods for official business, such as your car must be pre-approved. Mileage reimbursement will be at the current IRS mileage reimbursement rate. Verification of state-mandated automobile insurance and a valid driver's license is required before an employee will be permitted to use a personal vehicle for company business.

Personnel Records

Changes in Information

In order to keep records of employment up to date, it is the responsibility of employees to notify your Supervisor and/or the staff Payroll Administrator about changes such as the following:

- Name, address, and telephone number
- Emergency contact person
- Any other pertinent information

An employee has the right to review their own personnel or payroll records in the presence of a company representative. A request to do so must be made at least one day in advance of the time requested for the review.

Confidentiality of Records and Data

Information concerning the personal affairs of employees is confidential. Such information must be communicated in a professional manner by authorized staff for appropriate business purposes only.

Disclosure of patient or staff identities, nature of treatment, or operating practices to outside persons or organizations threatens the privacy of Urban Hills Dispensary and our clients. Such disclosures will result in discipline including discharge. If you receive a request for information from an outside agency, contact your Supervisor immediately.

Information about Urban Hills Dispensary and its participants is to be released only by authorized staff. Private information regarding employees is not to be given out under any circumstances.

Urban Hills Dispensary may use a Social Security number to perform an administrative duty related to employment, including, for example, to verify the identity of an individual; to detect or prevent identity theft; to investigate claims; to perform a credit check, criminal background check or diving history check; to enforce legal rights; or to administer benefits programs.

Conflicts of Interest

Our success depends on the hard work, dedication, and integrity of everyone who works here. In turn, our employees' livelihood depends on the success of our Company.

Because we depend so much on our employees, and because they depend so much on us, we expect all employees to devote their energies and loyalties to Urban Hills Dispensary. We do not allow employees to engage in any activities or relationships that create either an actual conflict of interest or the potential for a conflict of interest.

Although we cannot list every activity or relationship that would create either an actual or potential conflict of interest, examples of activities that violate this policy include the following:

- Working for a competitor or customer or vendor as a part-time employee, full-time employee, consultant, or independent contractor, or in any other capacity;

- Owning an interest in a competitor, customer, vendor, or anyone else who seeks to do business with this Company;
- Using the resources of this Company for personal gain, and/or using your position in this Company for personal gain.

Employees who violate this policy face disciplinary action, up to and including termination. If you are unsure about if a activity might violate this policy, or if you have any questions at all about this policy, please contact your Supervisor.

Employees must inform Management if they have an outside job. Urban Hills Dispensary has the right to determine what activities are considered a conflict of interest, but this decision is always subject to review. Failure to notify may be cause for reduction in hours or grounds for dismissal.

General Confidentiality

Proprietary Information

Employment by Urban Hills Dispensary creates a relationship of confidence and trust with respect to any confidential information that may be disclosed to employees. Such proprietary information includes but is not limited to trade secrets, marketing plans, product plans, business strategies, financial information, customer lists, client lists, potential client lists, and supplier and vendor contact information.

Proprietary information includes that which is identified by this organization as confidential, is known by an employee to be confidential, or reasonably should be known by an employee to be confidential. Proprietary information can be included in memos, manuals, letters, computer disks, tapes or other information storage devices, hardware or any other media, document or vehicle, or disseminated verbally. Proprietary information does not include information generally known or that which becomes public through no fault of an employee.

Confidentiality

At all times, both during employment with this organization and after employment, employees must keep all proprietary information in strictest confidence. Current and former employees must not use, retain, disseminate, or disclose any such information without the prior written consent of the management of Urban Hills Dispensary, except as may be necessary to perform duties as an employee of Urban Hills Dispensary. Upon termination of employment with Urban Hills Dispensary, employees must promptly deliver to Urban Hills Dispensary any and all documents and materials of any nature pertaining to work with Urban Hills Dispensary.

Company Property

Employees must not use any of Urban Hills Dispensary. proprietary information, work product, customer or prospect lists, manuals, records, correspondence, contracts, notes, memoranda or any other documents, media, equipment or any other tangible or intangible property of Urban Hills Dispensary (collectively "Company Property") for any purpose other than for the benefit of Urban Hills Dispensary. Except for business uses related to the performance of their jobs, employees must not remove from the premises any Company Property without the written consent of their supervisor. Upon termination of employment or at any time at the request of Urban Hills Dispensary, employees must promptly return all Company Property and any work product derived from Company Property.

Professional Conduct

Solicitations and Distributions

Urban Hills Dispensary does not allow solicitation, money collection, or sale of merchandise by one employee to another while either employee is on work time, except as explained below. Work time does not include meal and rest periods.

Distribution of advertising material, handbills, or printed or written literature of any kind in working areas is prohibited at all times.

Under no circumstances should an employee or vendor working on the behalf of our company solicit, sell items, or in any way collect money, services or donations from our clients.

The Company does not permit any type of solicitation or distribution of literature by non-employees on its premises at any time. Exceptions may occasionally be made by the owner of Urban Hills Dispensary.

Personal Appearance

Urban Hills Dispensary considers it very important that employees are well groomed, neat, and dressed appropriately for a patient-services environment and their job functions. Appropriate dress and hygiene are important in promoting a positive company image to our patients, neighbors, and the larger community, both internally and externally. Staff must present themselves in a tidy, clean, and professional manner that fits the company's mission and philosophy of service, professionalism, and wellness.

At this time, we ask that all Staff conforms to the following standards:

- All facial hair must be well groomed at all times;
- No Colognes, Perfumes or heavy body scents (Many of our patients are very sensitive to strong scents.);
- No Shorts;
- No visible offensive tattoo's;
- No Facial Piercing;
- No backpacks or large bags will be allowed into or out of the dispensary without express approval of management (Lockers will be provided outside the working area).

If you are unsure of the appropriate attire for any position, contact a Supervisor

Attitude and Conduct

The Company strives to provide the very best service in a professional and friendly atmosphere. The manner in which participants, volunteers, visitors and coworkers are treated reflects directly upon the reputation of Urban Hills Dispensary. Employees are expected to be courteous, friendly and helpful at all times.

Employees should attempt to resolve problems or complaints directly and respectfully with the other party involved. If this is not possible, the issue should be taken to a Supervisor. It is our goal to maintain an attitude that is positive, cheerful, and cooperative.

A Word about Workplace Conflicts

It is the responsibility of each employee to act in accordance with this information. Any job-related problems should first be discussed politely and calmly with the other individual involved. Most matters can be resolved at this level without the need for management intervention. If a problem cannot be resolved at this level, or if you as an employee do not feel comfortable talking to the other individual involved, then this should be discussed with your Shift Supervisor. Many of the conflicts that arise in the typical work environment can be settled at this level, provided that they are aware of all the issues and concerns.

If a matter is not resolved satisfactorily with the shift supervisor, the employee should advise the employee that the matter will be discussed with the owner of Urban Hills Dispensary to determine the next steps. All matters will be kept confidential as appropriate to the issue at hand.

Technology Policies

Telephones

With the exception of emergencies, personal phone calls and text messaging should take place only during non-working time, such as meal or break periods. Personal use of company telephones for long-distance calls by employees is not allowed except in the case of an emergency. Employees are encouraged to use a telephone calling card to bill calls to their home telephone. Employees must obtain approval from a member of management to make an emergency long-distance call using company telephones. The use of cell phones is limited to break periods.

Media Devices

Personal media devices with earpieces, such as iPods, iPhones, or other types of devices, should be used only during non-working time, such as meal or rest periods. These devices should never be used at workstations or in a manner that prevents the employee from hearing emergency radio or other safety calls.

Use of Internet, E-Mail, and Electronic Communications

Urban Hills Dispensary technology resources are to be used by employees only for the conduct of company business. Employees have no right to privacy with respect to any use of Urban Hills Dispensary technology resources including but not limited to Internet, e-mail, voice mail, and any other form of electronic communications.

To preserve the integrity of our computer systems, we ask employees to use the Internet and e-mail judiciously and only for business-related needs. The spread of computer viruses can affect Urban Hills Dispensary business. For that reason, all access to the Internet must be done through an approved Internet firewall. Never download files from the Internet, accept e-mail attachments from outsiders, or use disks or portable data devices from non- Urban Hills Dispensary sources, without first scanning the material with Urban Hills Dispensary -approved virus-checking software. If it is suspected that a virus has been introduced into the Urban Hills Dispensary system, notify management immediately.

Urban Hills Dispensary policy prohibiting all types of harassment applies to the use of electronic communications systems, including Internet access. No one may use electronic communications in a manner that may be construed by others as harassment based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law. No jokes on these bases should be transmitted over Urban Hills Dispensary electronic communications systems.

Unauthorized access or misuse of these systems is not permitted and may result in disciplinary action up to and including dismissal. Urban Hills Dispensary e-mail should not be used for personal reasons. Employees with Urban Hills Dispensary e-mail addresses should be aware that Urban Hills Dispensary may monitor, review, or access their work e-mail account, and that abuse of the account may be grounds for revoking the employee's account and/or access to Urban Hills Dispensary, computer systems and other disciplinary action up to and including termination.

Social Media

No employee shall represent themselves as an agent of Urban Hills Dispensary for purposes of posting information or material on behalf of the company without expressed permission of management. In addition, no photograph, or workplace likeness may be taken of the operation for purposes of posting and sharing with the general public. This includes postings of pictures or discussion of our operation on Facebook, Instagram, personal blogs, etc. Failure to adhere to this policy will lead to disciplinary action, up to, and including termination.

Staff Development

Training

In order to maintain staff competency and provide for growth and development, in-house training programs will be scheduled. These trainings are mandatory for all staff members, and both exempt and non-exempt employees will be paid for this time.

To the extent possible, employees will be encouraged to attend professional seminars, to use research resources available in the community, and to increase professional knowledge through continuing education resources in the community.

Urban Hills Dispensary may subscribe to periodicals and purchase books beneficial to our objectives. This information will be available to all staff members and can be consulted when needed. This should only be when not otherwise occupied serving clients and as approved by a supervisor.

Performance Evaluations

Performance evaluations will be completed for all employees before their 90 day probationary period ends and annually thereafter, by your anniversary date. Your evaluation will be conducted with your immediate supervisor. Evaluation forms should be completed in duplicate, with the employee receiving one completed copy and the original for your personnel file copy. Refusal to sign by an employee must be documented in writing and put in the employee's file.

At Urban Hills Dispensary, we strive to offer ongoing performance evaluation to all staff members. Supervisors are expected to offer regular informal feedback on issues like job performance and improvement areas. We practice open communication between all staff members to gather ideas and input, both positive and negative.

Additional employee evaluations and probationary evaluations will be performed by the Supervisor whenever necessary.

Promotions

As vacancies arise or new positions are added, employees are encouraged to apply for those positions for which they believe they are qualified.

Communications

Types of Communications

Good communication is vital for the efficient and effective operation of Urban Hills Dispensary. Thus, there is a concentrated effort to provide channels of communication at all levels of the organization.

Supervisors are responsible for keeping employees informed in matters relating to their work and their relationship with the Urban Hills Dispensary. The employee has the responsibility of communicating to their Supervisor any significant information relating to participant care, Urban Hills Dispensary. Security, needed maintenance services, or any other matter that may require attention.

Notices of events or changes that may affect individuals, a department, or the entire facility, are printed in memo form, placed in mailboxes, announced at staff meetings, and may be posted. It is the employee's responsibility to check for important notices. Only material approved by the Supervisor or Management may be distributed or posted.

Mandatory Staff Meetings

Employees meet regularly to discuss ideas, problems, and other matters of mutual concern. General staff meetings are held regularly to keep employees aware of Urban Hills Dispensary activities and to report and get input on topics of concern. Department meetings are scheduled as needed to discuss activities and program.

Health and Safety

General Health and Safety

Employees are expected to take an active interest in preserving and protecting Urban Hills Dispensary physical equipment. Each employee is asked to report promptly to their supervisor any needed maintenance services in order to avoid possible injury or further deterioration or damage.

Security

It is Urban Hills Dispensary policy to do whatever is necessary to safeguard participants, employees, volunteers, visitors and facilities. For this purpose, we employ an experienced security team. An employee of Urban Hills Dispensary should be quick to report to a supervisor or management any suspicious persons or circumstances. Also, observing the rules and regulations of the various departments and maintaining the proper security of Urban Hills Dispensary property is important.

In case of an emergency, such as fire, health issues, or concern about crime, always call 911 immediately.

Safety

In addition to basic safety orientation, and keeping current with new Urban Hills Dispensary policies, each employee can contribute to Urban Hills Dispensary safety efforts by:

- immediately calling 911 if someone loses consciousness or has a medical emergency
- reporting potential hazards to a supervisor
- immediately reporting accidents and injuries to your supervisor
- caring properly for equipment
- keeping work areas organized
- being generally alert and careful on the job

Fire Safety

Each employee is expected to know their responsibilities as defined in the Fire and Emergency Plan, including how to use the fire extinguishers and how to report a fire. Fire drills will be held at regular intervals.

Prevent fire hazards by:

- immediately reporting accumulation of combustible materials, faulty connections or other hazards to a supervisor
- knowing the location of the nearest fire alarm, fire extinguisher, telephone, and fire exit
- in case of fire in the work area, call 911
- immediately calling 911 in case of emergency
- being alert for fire hazards
- carrying out your designated responsibilities

Reporting Accidents

If an on-site injury or illness does occur to an employee, visitor, or client, regardless of how minor its severity, it must be reported immediately to a supervisor to receive prompt evaluation and to obtain medical attention, if necessary. The injured employee and Supervisor must document the occurrence via accident report.

Emergency Plan

A disaster is any situation, usually catastrophic in nature, in which people are rendered helpless or are injured and in need of immediate medical care. Urban Hills Dispensary must be ready to meet this need at all times. It is important that all employees are available, and report for duty according to need. This may include remaining at Urban Hills Dispensary for a period of time longer than the normally scheduled workday. We encourage staff members to take the Disaster Management training offered regularly by local Fire Departments.

Smoking in the Workplace

In consideration of the health and safety of all our staff members, we maintain a tobacco-free workplace. Smoking tobacco is only permitted outside of Urban Hills Dispensary building and should always be done at least 50 feet from a building door or window or otherwise in conformance with the local law in effect.

Violence-Free Workplace

Urban Hills Dispensary is committed to providing a safe, violence-free workplace. Urban Hills Dispensary strictly prohibits employees, consultants, visitors, clients, and anyone else (regardless of whether the

individual was uninvited or invited to a Urban Hills Dispensary-related activity) on the Urban Hills Dispensary premises from behaving in a violent or threatening manner. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, attempts to intimidate or to instill fear in others, menacing gestures, bringing weapons to the workplace, stalking, or any other hostile, aggressive, injurious or destructive actions undertaken for the purpose of domination or intimidation.

In situations where an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be sought immediately. In such situations, the employee should consider immediately contacting law enforcement by dialing 911. All incidents reported to Urban Hills Dispensary will be taken seriously and will be addressed appropriately.

No employee will be subject to retaliation, intimidation, or discipline as a result of reporting a threat under this policy. If an investigation confirms that threat of a violent act or violence itself has occurred, Urban Hills Dispensary will take appropriate corrective action. Violation of Urban Hills Dispensary violence-free workplace policy will result in disciplinary action up to and including immediate dismissal.

Lactation Accommodation

Urban Hills Dispensary will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's infant child. The break time, if possible, must run concurrently with rest and meal periods already provided to the employee. If the break time cannot run concurrently with rest and meal periods already provided to the employee, the break time will be unpaid.

Urban Hills Dispensary will make reasonable efforts to provide employees with the use of a room or location other than a toilet stall for the employee to express milk in private. Urban Hills Dispensary may not be able to provide additional break time if doing so would seriously disrupt operations. Please speak to your supervisor or members of management if you have questions regarding this policy.

Sensible Substances Use

It is Urban Hills Dispensary intent to provide a healthful, safe, and secure workplace. All employees must observe these basic requirements:

- Employees are not to report to work under the influence of alcohol or illegal drugs.
- Employees will not possess, use, manufacture, sell or distribute illegal substances in the workplace or while conducting Urban Hills Dispensary business.

Violation of the above policy will result in disciplinary action up to and including immediate dismissal.

The lawful use of controlled substances prescribed to you by a licensed physician, or those that are available over the counter, is not prohibited by this policy. However, if a physician has prescribed medication that requires any accommodation, please notify your supervisor to discuss what accommodations are necessary.

Employee Relations

Open Communications

Urban Hills Dispensary encourages an open environment in which work-related issues such as problems with

other employees, supervisors, working conditions, or the application of any of the Urban Hills Dispensary policies may be discussed openly and honestly with the intent of resolving the concern. We believe that open communication produces a richer and more productive workplace, enhances the quality of decisions, and ultimately improves the quality and value of the work we do. It is expected that all Urban Hills Dispensary employees will use open communication to solve routine problems and conflicts that may arise.

Standards of Conduct General Policy

Urban Hills Dispensary wants to provide a productive and mutually supportive environment for all employees. Urban Hills Dispensary in turn expects a good productive effort and the recognition of responsibility on the part of employees. All of us have the responsibility to our coworkers to conduct ourselves according to certain rules of good behavior, professional conduct, and performance.

In general, good judgment, based on high ethical principles, will guide each employee with respect to lines of acceptable conduct. If it is difficult to determine the proper course of action, the matter should be discussed openly with the employee's shift supervisor or a member of management.

Violations of Urban Hills Dispensary standards may result in action up to and including immediate termination without prior warning, based upon the seriousness of the infraction, the employee's past performance record, and the circumstances surrounding the violation, among other things. Urban Hills Dispensary reserves the right to impose whatever form of discipline it chooses, or none at all in a particular instance. Urban Hills Dispensary will deal with each case individually, employing the standards and procedures detailed in our Employee Problem Resolution process described below, and nothing in this handbook should be construed as a promise of specific treatment in a given situation.

As a reminder, the working relationship between an employee and Urban Hills Dispensary is on an at-will basis, which means it is subject to termination by either Urban Hills Dispensary or the employee at any time, for any reason. There are no contractual relationships between Urban Hills

Dispensary and an employee, and letters, benefit or policy statements, performance appraisals, employee handbooks or other employee communications should not be interpreted as such. No one has the authority to enter into any oral or written employment contract without the signed explicit written approval of the owner of Urban Hills Dispensary, and no written employment contract will be valid without the signature of a Urban Hills Dispensary Owner.

Employee Responsibility

It is the duty and the responsibility of every employee to be aware of and abide by existing rules and regulations.

It is also the responsibility of the employee to perform his/her duties to the best of his/her ability and to the standards as set forth in his/her job description or as otherwise established. Employees are encouraged to take advantage of all learning opportunities available and request additional instruction when needed.

Responsibilities of Supervisors

The immediate Supervisor must approach corrective measures in an objective manner. If the employee's performance of an assigned task is the issue, the supervisor should generally look to see that proper

instructions, appropriate orientation and training have been given and that the employee is aware of the job expectations. Not only single incidents, but also patterns of poor performance should be of concern as these are indicative of overall performance. If misconduct is the issue, the Supervisor, should take steps to make sure that the employee has been made aware of the company's policies and regulations regarding the infraction. If in either case appropriate instruction or information was not communicated, a plan for such communication should be immediately developed and reviewed with the employee.

Employee Conduct

Urban Hills Dispensary supports the use of progressive discipline to address conduct issues such as poor work performance or misconduct and to encourage employees to become more productive workers and conform their behavior to company standards and expectations. Generally, a supervisor gives a warning to an employee to explain behavior that the supervisor has found unacceptable.

There are two types of warning, verbal and written.

A verbal warning is when a supervisor verbally counsels an employee about an issue of concern. A written record of the discussion, noting the date, event and recommended action, is usually placed in the employee's file for future reference.

Written warnings are used for behavior or violations which a supervisor considers serious or where a verbal warning has not helped to change unacceptable behavior. An employee should recognize the grave nature of the written warning.

Whenever an employee has been involved in a disciplinary situation that has not been readily resolved or when he/she has demonstrated an inability to perform assigned work responsibilities efficiently, the Supervisor, or designee in consultation with a, may place the employee on a performance improvement plan. This status will last for a predetermined amount of time. Within this time period, the employee must demonstrate a willingness and ability to meet and maintain the conduct and/or work requirements as specified by the supervisor and the organization. At the end of the performance improvement period, the employee will either be returned to regular employee status or, if established goals are not met, dismissal may occur.

Employee Benefits

As of the writing of this handbook, Urban Hills Dispensary is unable to offer any benefit packages, including vacation, medical, dental, or retirement plans. The only benefit packages that are being offered are those required by local, state, and federal law. Should an additional benefit package be offered, you will be directly contacted by your manager. Should you need to take time off, please contact your manager to make arrangements so the operation can continue to operate smoothly and without interruption. Please ensure any requests for time off are extended in writing.

Sick Leave

Urban Hills Dispensary recognizes that employees may be unable to work because of illness or injury, and that employees may require time off to secure necessary treatment for medical conditions or disabilities. Time off may be taken for medical or dental appointments, however, prior approval of management is necessary. However, abuse of this policy may be grounds for dismissal.

Healthy Families Act of 2014

Effective July 1, 2015, under the Healthy Workplaces Healthy Families Act, new sick leave requirements have been will imposed on California employers guaranteeing them at least three paid sick days per year.

New employees will be granted 3 paid sick days after 60 days of employment. In general, you will be allowed accrued paid sick leave to roll over to the next year. However, you will be limited to the use of paid sick leave in a year to 24 hours, or three days, in each year of employment. Exceptions to this rule can be made under FMLA, and for more serious illness.

Total sick leave accrual balance will not exceed 48 hours, or six days. Employees are able to use paid sick time for preventive care for themselves or a family member.

An employee who uses sick leave is entitled to compensation for his or her sick day at his or her standard hourly rate.

No payout will be made of accrued sick leave upon termination of your employment. As an employer, we will continue to maintain our records as required for a length of at least three years as required by law and to ensure paid sick leave, such as worked hours, accrual, and utilization of paid sick leave remain accurate.

You have the right to file a complaint should you feel that your rights under this act have been violated, and you have the right not to be retaliated against should you file a complaint.

You may also review prominently placed posters in our workplace which include information about the new sick leave rights. .

Jury Duty and Witness Leave Time

If you are called for jury duty, you are entitled to take time off, as necessary, to fulfill your jury obligations. To ensure appropriate coverage during an employee's jury service period, upon receipt of a jury notice or subpoena, a copy of such notice must be furnished promptly to management of Urban Hills Dispensary. If an employee is not required to report, or is released early from jury or witness duty, they should return to work immediately. If you are chosen to sit on a jury, you must inform your supervisor how long the trial is expected to last. You must also check in with your supervisor periodically during your jury service, so that the Company knows when to expect you back at work. This leave will be unpaid. However, exempt employees will be paid their full weekly salary for any workweek interrupted by jury or witness duty.

Time off to Vote

If an employee is unable to vote in a statewide election during non-work hours, they may arrange with their Supervisor, with at least 48 hours notice, to take up to two hours off work, with pay, to vote. Employees are encouraged to take advantage of the absentee ballot system to cast their vote conveniently. Voters may take time off at the beginning or end of a shift to allow for sufficient time to vote, with up to two hours of that time being with pay in accordance with California State Law.

Unpaid Personal Leave

Should you need to take unpaid personal leave, you make a request by forwarding your written may be granted for justifiable reasons, such as childcare or to care for an ill family member, at Urban Hills Dispensary discretion, provided the leave does not seriously disrupt Urban Hills Dispensary operations. If the personal leave is to take care of a member of an employee's immediate family (parent, child, spouse or registered

domestic partner) who is ill, or to bond with a newborn or newly adopted or foster child, the employee may be eligible for Paid Family Leave payments from the State of California.

Requests will be reviewed based on a variety of factors, including but not limited to the employee's position, length of service and performance record. Reinstatement cannot be guaranteed in advance to employees returning from personal leave.

In the event that a personal unpaid leave is approved, it is expected that an employee on leave will return to work on the next regular working day after the leave ends. If an employee does not return, then the employee will be considered to have voluntarily quit their position.

Pregnancy Disability Leave

If you are disabled by pregnancy, childbirth, or related medical conditions, you are eligible to take a pregnancy disability leave (PDL). If you are affected by pregnancy or a related medical condition, you also are eligible to transfer to a less strenuous or hazardous position or to less strenuous or hazardous duties, if such a transfer is medically advisable and can be reasonably accommodated. In addition, if it is medically advisable for you to take intermittent leave or work a reduced leave schedule, Urban Hills Dispensary may require you to transfer temporarily to an alternative position with equivalent pay and benefits that can better accommodate recurring periods of leave.

The PDL is for any period(s) of actual disability caused by your pregnancy, childbirth, or related medical condition up to four months (or 88 workdays for a full-time employee) per pregnancy. The PDL does not need to be taken in one continuous period of time but can be taken on an as-needed basis. Time off needed for prenatal care, severe morning sickness, doctor-ordered bed rest, childbirth, and recovery from childbirth is covered by your PDL. Generally, we treat your pregnancy disability the same as we treat other disabilities of similarly situated employees.

You are required to obtain a certification from your health care provider of your pregnancy disability or the medical advisability of a transfer. The certification should include: (1) the date on which you became disabled due to pregnancy or the date of the medical advisability of a transfer; (2) the probable duration of the period(s) of disability or the period(s) for the advisability of a transfer; and, (3) a statement that, due to the disability, you are either unable to work at all or to perform any one or more of the essential functions of your position without undue risk to yourself or to other persons, or a statement that, due to your pregnancy, a transfer to a less strenuous or hazardous position or duties is medically advisable.

As a condition of your return from PDL, the Company requires you to obtain a release to return to work from your health care provider stating you are able to resume your original job duties.

PDL leave is unpaid by the Company. We encourage you to contact the Employment Development Department regarding your eligibility for state disability insurance for the unpaid portion of your leave.

If you do not return to work on the originally-scheduled return date or request in advance an extension of the agreed upon leave with appropriate medical documentation, you may be deemed to have voluntarily terminated your employment with Urban Hills Dispensary. Failure to notify the Company of your ability to return to work when it occurs, or your continued absence from work because your leave must extend beyond the maximum time allowed, may be deemed a voluntary termination of your employment with the Company, unless you are entitled to Family and Medical Leave. Upon your return from PDL, you will be reinstated to your same position in most instances.

Any request for leave after your disability has ended will be treated as a request for Family and Medical Leave under the California Family Rights Act and the federal Family and Medical Leave Act, if you are eligible for such leave.

Ending Employment

Resignation

Urban Hills Dispensary will consider that an employee has voluntarily terminated employment if they do any of the following:

- Resigns from Urban Hills Dispensary (two weeks advance notice is requested);
- Does not return from an approved leave of absence on the date specified by Urban Hills Dispensary;
- Fails to report to work and fails to contact Supervisor for three or more days in a row.

Termination

The end of an employee's employment relationship with Urban Hills Dispensary may occur for any or no reason (see At-Will Employment Status section above). In all possible cases, the company requests that the employee take part in an exit interview, which will include discussion about any benefits due to the employee. Urban Hills Dispensary also requests that any property, including keys, badges, and other property belonging to the company be returned. The Company also requests that any passwords, or access to any information deemed essential to the daily operation of the company be surrendered at this time.

Discharge

Violations of state or federal laws, violations of Urban Hills Dispensary standards of conduct, falsification of information in an employee's job application process, excessive absences, tardiness, or failure to perform the job satisfactorily may subject the employee to discipline, up to and including immediate discharge from employment.

Following is a non-exhaustive list of examples of conduct that could result in discipline or termination:

- Substandard job performance;
- Refusal to perform tasks or follow instructions;
- Any form of intentional dishonesty;
- Fighting, or provoking a fight;
- Acts of violence, intimidation, or express or implied verbal or physical threats to anyone on the organization's premises or when representing Urban Hills Dispensary possession, display, or use of explosives, firearms, or other weapons;
- Disregard for Urban Hills Dispensary rules, regulations, or policies;
- Violation of any federal, state, or local laws that adversely affects the organization;
- Violation of Urban Hills Dispensary Equal Employment Opportunity or Anti-Harassment policies;
- Failure to report for work on a regular and timely basis without satisfactory reason;
- Excessive absenteeism, including frequent use of sick leave on days adjacent to scheduled time off;
- Inefficiency and incompetence;

- Willful or careless destruction of Urban Hills Dispensary property
- Refusing to obey direct, lawful and reasonable instructions from a supervisor;
- Conduct that may cause injury to others;
- Threatening any employee, visitor or volunteer;
- Loitering or sleeping while on duty;
- Soliciting or accepting tips from clients, volunteers, employees or business concerns;
- Disregard for appropriate appearance or personal hygiene;
- Inebriation or intoxication while on duty;
- Disregard for safety rules in on-the job performances;
- Engaging in actions determined to represent conflict of interest as set forth herein;
- Prohibited harassment of applicants, employees, contractors, and members of the public.

Termination Checkout

Before termination, an employee should take care of the following items:

1. Notify their supervisor, in writing, of their intention to terminate.
2. Complete necessary forms for terminating benefits, and make an appointment for an exit interview with the next level of management or designee
3. Pay or arrange with the Payroll Manager to clear any outstanding accounts with Urban Hills Dispensary
4. Return any Urban Hills Dispensary keys or property to one's supervisor.

Termination Interview

A member of management or designee may interview an employee terminating service with Urban Hills Dispensary. The purpose of this visit is to provide an opportunity to express observations for improvements in the employee's department or Urban Hills Dispensary.

Handbook Created by J. Chambers, SPHR for Liana Limited LLC. No duplication, changes, modification can be made without pre- authorization of Liana Limited, LLC. Please note that local, state, and federal laws are subject to change, thus the contents of this handbook should be periodically reviewed to ensure that employees are given up to date information, and that this organization bases its business practices on sound principles and human capital management practices.

Acknowledgement of Receipt

By signing this form, I acknowledge that I have received a copy of the Employee Handbook and Job Description. I have read it or have had it read to me carefully. I understand all of its rules, policies, terms and conditions, and agree to abide by them, realizing that failure to do so may result in disciplinary action and/or termination. I understand and agree that my employment is terminable at will, which means that both Urban Hills Dispensary and I remain free to choose to end our work relationship at any time, with or without notice and with or without reason or cause. No words or actions of Urban Hills Dispensary will be deemed to create an express or implied contract of employment or require Urban Hills Dispensary to have good cause for terminating my employment. No Urban Hills Dispensary representative is empowered or authorized to modify this at-will relationship other than Dustin Peebles, owner and founder of Urban Hills Dispensary.

I understand that nothing in this handbook in any way creates an express or implied contract of employment between Urban Hills Dispensary and me but rather is intended to foster a better working atmosphere while the employee/employer's relationship exists.

I also understand that Urban Hills Dispensary reserves the right at all times to modify, supplement, rescind or revise the policies and benefits contained in this handbook from time to time in its sole discretion, except as required by law and except for the rights of the parties to terminate employment at will, which may be modified only by an express written agreement signed by both me and the Management of Urban Hills Dispensary.

Employee's Signature

Date

Employee's Printed Name

Please return the original signed copy of this Acknowledgement Form.

PARCEL
052-052-05

ONE
STORY
STORAGE

Garden
lighting

Recessed
lighting
EXIT SIGNS

SINGLE
LIGHT
SCOFF

SINGLE &
DOUBLE
FLOOR
LIGHTS

ONE
STORY
BUILDING

ONE
STORY
BUILDING

ONE
STORY
BUILDING

* To Be developed by Electrical Engineer *
according to Planning Department *

