

Exhibit B

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PLN 170230

QUAIL CREEK FARMS, INC.
Standard Operating Procedures (SOPs)

Cultivation and Nursery



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CANNABIS WASTE MANAGEMENT

- I. **Cannabis Waste Management.** Licensee shall adhere to the following regulations when disposing of cannabis waste:
- A. **Cannabis Waste Defined.** “Cannabis Waste” is defined as organic waste.¹
 - B. **Hazardous Waste.** Licensee shall manage all hazardous waste in compliance with all applicable hazardous-waste statutes and regulations.²
 - C. **Waste Receptacles and Secured Areas.** Personnel shall dispose of cannabis waste in secured waste receptacles or in secured areas on the premises.
 - D. **Restricted Access to Secured Areas.** Secured areas shall be restricted to Licensee, employees of the Licensee or by the local agency or local agency franchised or contacted waste hauler only.
 - E. **No Public Access.** Public access to these designated receptacles or areas is strictly prohibited.
 - F. **Composting Waste on Premises.**³ If composting cannabis waste on the licensed premises, Licensee shall do so pursuant to the California Code of Regulations.
 - G. **Contracted Agency.** If a local agency, or local agency franchised waste hauler is being used to collect and process cannabis waste, Licensee shall provide the California Department of Food and Agriculture (“CDFA”) with:
 - 1. The name of the local agency providing waste hauling services;
 - 2. The company name of the local agency franchised or contracted or permitted waste hauler;
 - 3. The company business address; and
 - 4. The name and number of the primary contact person at the company;
 - 5. Documentation indicating the date and time the cannabis waste was collected;

¹ Definition of “Cannabis Waste” is pursuant to Section 42649.8(c) of Public Resources Code.

² Definition of “Hazardous Waste” is pursuant to Section 40141 of Public Resources Code.

³ See Title 14 of the California Code of Regulations at Division 7, Chapter 3.1 (Section 17850).

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6. A copy of the certified weight ticket evidencing receipt of the cannabis waste at one or more of the solid waste facilities

H. **Track and Trace System.**⁴ Personnel shall use the track-and-trace system and all documents required to ensure that cannabis waste is

1. Identified,
2. Weighed, and
3. Tracked while on the premises and when disposed of.

I. **Waste Records.** Personnel shall maintain accurate and comprehensive records regarding cannabis waste that account for, reconcile and evidence all activity related to the disposal of cannabis waste.

⁴ See page 6 for all additional track-and-trace system requirements.

GENERAL ENVIRONMENTAL PROTECTION MEASURES

II. **General Environmental Protection Measures.** Licensee shall comply with the following environmental protection measures:

A. **Water Code.** Licensee shall adhere to the Principles and Guidelines for Cultivation pursuant to Section 13149 of the Water Code.

B. **California Department of Fish and Wildlife (“CDFW”).** Licensee shall adhere to CDFW’s regulations regarding the diversion of water and land clearing such as:

- Timber conversion,
- Road construction,
- Stream crossings,
- Riparian vegetation removal, and
- Introduction of pollutants into waterways and other habitats.

C. **Department of Pesticide Regulations (“DPR”).**⁵ Licensee shall comply with all laws and regulations as enforced by the DPR.

1. **Application and Storage Protocols.** When using pesticides, Personnel shall:

- Properly label all pesticides;
- Store chemicals in a secure building or shed to prevent access by wildfire;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary to control the target pest;
- Prevent offsite drift;
- Not apply pesticides when pollinators are present;
- Not allow drift to flowering plants attractive to pollinators;
- Not spray directly to surface water or allow pesticide product to drift to surface water;
- Spray only when wind is blowing away from surface water bodies;
- Not apply pesticides when they may reach surface water or groundwater;

⁵ Compliance with pesticide laws and regulations as enforced by the DPR pursuant to Section 8307 of the Emergency Regulations.

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- Only use properly labeled pesticides.

D. Lighting Requirements. Licensee shall adhere to following lighting requirements:

1. **Outdoor lighting.** All outdoor lighting used for security purposes shall be shielded and downward facing.
2. **Greenhouse Lighting.** Mixed-light license types of all tiers and sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare.

E. Generator Requirements.⁶ Licensee shall adhere to following requirements regarding the use of generators on the premises.

1. **Generator Defined.** A generator is defined as a stationary or portable compression ignition engine.⁷
2. **Generator Types.** Generators rated at **fifty (50) horsepower and greater** shall demonstrate compliance with Airborne Toxic Control Measures.⁸ Compliance shall be demonstrated by providing a copy of one of the following to the CDFA upon request:
 - A Portable Equipment Registration Certificate provided by the California Air Sources Board, or
 - A Permit to Operate obtained from the Local Air District with jurisdiction over the licensed premises.
3. **Meters.** All generators shall be equipped with non-resettable hour-meters.

F. Discovery of Human Remains.⁹ Personnel shall immediately halt cultivation activities if human remains are discovered on the premises until the coroner of the county in which the human remains are discovered.

1. **Two-Day Notice.** The coroner shall make his or her determination within two working days from the time the person or representative responsible for the

⁶ Requirements for generators are pursuant to Section 8306 of the Emergency Regulations.

⁷ The definition for “generator” is pursuant to Title 17, Division 3, Chapter 1, Subchapter 7.5, Section 93115.4 of the California Code of Regulations.

⁸ Pursuant to Title 17, Division 3, Chapter 1, Subchapter 7.5, Sections 93115 through 93116.5 of the California Code of Regulations.

⁹ These determinations are made pursuant to Section 7050.5 of Health and Safety Code.

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excavation notifies the coroner of the discovery.

TRACK-AND-TRACE SYSTEM

III. Track-and-Trace System Requirements.

A. Record Cannabis Activities. The track-and-trace system shall be used to record all applicable commercial cannabis activities.

1. **Accuracy and Completeness.** Licensee is responsible for the accuracy and completeness of all data and information entered into the track-and-trace system. Data entered into the system is assumed to be accurate and can be used to take enforcement action against the Licensee if not corrected.

B. Authorized Personnel and System Access. Only authorized Personnel shall enter commercial cannabis activities into the system.

1. **Account Managers.** Licensee shall designate a representative within the organization as the Licensee's legal track-and-trace account manager ("Account Manager").
2. **Training.** The Account Manager must complete track-and-trace system training as required by the CDFA. If the Account Manager does not complete the required training prior to receiving the annual license, he or she must register for the state mandated system training within five (5) days of the license issuance.
3. **Designate System Users.** Licensee shall designate track-and-trace system users and the Account Manager train the users in the proper and lawful use of the system before they are permitted access to it.
4. **Changes in Personnel.** The Account Manager shall maintain an accurate and complete list of all other Account Managers and users and shall update the list immediately when changes occur.
5. **Cancellation of Users.** Licensee shall cancel users from the system account if that individual is no longer a representative.
6. **Corrections.** Licensee shall correct any data that is entered into the system in error within three (3) business days of discovery.

C. Loss of System Access. If access to the track-and-trace system is lost, Licensee shall prepare and maintain comprehensive records detailing all required inventory tracking devices conducted during the loss of access.

1. **Access Restored.** Once access is restored, all inventory tracking activities that occurred during the loss of access shall be entered into the system within three (3) business days.
2. **Date and Time.** Licensee shall document the date and time when access to the system was lost and when it was restored and the cause for each loss of access.
3. **Halting Activities Until Access is Restored.** Licensee shall not transfer cannabis or non-manufactured cannabis products to a distributor until access to the system is restored and all information is recorded into the system.

D. Account Manager and User Requirements.

1. **Log-On identification.** Each Account Manager and user shall have a unique log-on, consisting of a username and password which may not be shared with anyone.
2. **No Misrepresentation of Information.** No Account Manager, user, or other representative shall intentionally misrepresent or falsify information entered into the system.
3. **Notifications and Issues.** The Account Manager shall monitor all system notifications and may not dismiss them until all issues within the notification have been resolved within the specified timeframe.

E. System Reporting Requirements. Licensee shall report the following in the track-and-trace system:

1. **Cannabis Transfers.** Account Manager(s) or users shall report transfers of cannabis or non-manufactured cannabis products to other licensed entities prior to products' departure from the premises.
2. **Receipt and/or Rejection of Cannabis.** Account Manager(s) or users shall report cannabis or non-manufactured cannabis products received or rejected from another licensee within twenty-four (24) hours of receipt/rejection.
3. **Changes in Cannabis.** The Account Manager or users shall report in the system any change in the change in the disposition of cannabis plants on the licensed premises within three (3) business days of the change in the disposition. Changes in disposition of cannabis plants include but are not limited to:
 - Flowering;
 - Destruction or disposal;

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- Harvest;
- Processing;
- Storage; and
- Packaging.

4. **Transfer Information.** The Account Manager or user shall be required to record the following information for each transfer of cannabis or non-manufactured cannabis products to or products received from, other licensed premises:

- Name, business, address, and department issued license number of the *seller*;
- Name, business address, and department issued license number of the *purchaser*;
- Name and department issued license number of the *distributor*;
- Date of sale, transfer or receipt (month, day and year). This information applies to the *licensee receiving* the products.
- Weight or count of individual units of cannabis or non-manufactured cannabis products sold, transferred or received;
- Estimated departure and arrival time;
- Actual departure time;
- Description for each item including strain or cultivar, and all of the applicable information about the plant, flower, leaf, shake, kief, and pre-rolls;
- UIDs.

F. **Liabilities.** Licensee is responsible for all actions any representatives take while logged into system or otherwise conducting commercial cannabis activities.

TRACK-AND-TRACE INVENTORY REQUIREMENTS

- IV. **Inventory Requirements in General.** Licensees shall use the track-and-trace system for all inventory tracking activities at their licensed premises, including, but not limited to:
- A. **Reconciling.** Personnel shall reconcile all on-premises and in-transit cannabis or non-manufactured cannabis products inventories pursuant to the time frames defined by the CDFA.
 - B. **Recording.** Personnel shall record the net weight of all harvested cannabis once the majority of drying, trimming and curing activities have been completed, or within sixty (60) calendar days from the initial harvest date, whichever is sooner.
 - C. **Closing Out Physical Inventory.** Personnel shall close-out their physical inventory of all cannabis and non-manufactured cannabis products, and UIDs, if applicable prior to the effective date of any of the following changes to their license:
 - 1. Voluntary surrender of a temporary license or annual license,
 - 2. Expiration of annual license,
 - 3. Revocation of a license.
 - D. **Items to Close-Out.** Close-out of physical inventory includes, but is not limited to:
 - 1. Immature plants and their corresponding lot UIDs;
 - 2. Mature plants and their corresponding plant UIDs;
 - 3. Harvest batches and their corresponding UIDs;
 - 4. Non-manufactured cannabis products and their corresponding UID(s); and
 - 5. UIDs in Licensee's possession which have not been assigned in the track-and-trace system.
 - E. **Transfers and Sales.** All transfers and sales shall be documented pursuant to following Sections:
 - 1. **Sales Invoice or Receipt Requirements.**
 - 2. **Track-and-Trace System Reporting Requirements.**

TRACK-AND-TRACE SYSTEM UNIQUE IDENTIFIERS

V. Unique Identifiers (UIDs). Licensee shall adhere to the following regulations regarding track-and-trace system unique identifiers:

A. Requesting UIDs. Within five (5) business days of the date the Account Manager(s) as credentialed by the CDFA to use the track-and-trace system, Licensee shall:

1. Request UIDs using the system;
2. Only use UIDs provisioned and distributed by the CDFA or its designee;
3. Maintain sufficient supply of UIDs in inventory to support tagging;
4. Use the system to document receipt of provisioned and distributed UIDs within three (3) business days of physical receipt of the UIDs;
5. Enter all cannabis into the track-and-trace system starting with seed, clone propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery pursuant.

B. UID Required Throughout All Phases of Growing Cycle. The UID shall accompany the cannabis products through all phases of the growing cycle as follows:

1. **Immature Plants.** Licensees with immature plants shall:
 - Assign a UID to each established lot respectively;
 - Place the lot UID in a position so it is visible and within clear view of an individual standing next to the immature lot;
 - Keep all UIDs free from dirt and debris.
 - Not have more than one-hundred (100) immature plants, at any one time.
 - Label all immature plants contiguously with the corresponding UID number assigned to the lot in order to facilitate identification by the CDFA.
2. **Transfer of Immature Plants.** Immature plants transferred from a licensed nursery, via a distributor, to a licensed cultivator shall meet requirements of Section B1 above.

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- Each immature plant intended for retail sale shall have a UID affixed, or be labeled with corresponding UID number of the lot, and be recorded in the track-and-trace system prior to the transfer from the licensed nursery.
3. **Individual Plants.** Licensee shall apply a UID to all individual plants at the time any plant is moved to the designated canopy area or when an individual plant begins flowering.¹⁰
4. **Mature Plants.** UIDs are required for each mature plant. In addition:
- UIDs shall be attached to the main stem, at the base of each plant;
 - The UID shall be attached to the plant using a tamper evident strap or zip tie and placed in a position so it is visible and within clear view of an individual standing next to the mature plant to which the UID was assigned; and
 - UIDs shall be kept free from dirty and debris.
 - Licensees are prohibited from removing the UID from the mature plant to which it was attached until the plant is harvested, destroyed, or disposed.
- C. **Harvest Batches.** Each harvest batch shall be assigned a unique harvest batch name which will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
- D. **UIDs Required for Products.** UIDs are required for all cannabis and non-manufactured cannabis products and shall be associated with the corresponding harvest batch name from which the products were derived.
- E. **Retiring UIDs After Disposal.** Upon destruction or disposal of any cannabis non-manufactured cannabis products, the applicable UIDs shall be retired in the system by Licensee within three (3) business days of the destruction or disposal and performed in accordance with Licensee's approved waste management plan.

¹⁰ "Flowering" means that a cannabis plant has formed a mass of pistils measuring greater than one half inch wide at its widest point.

TRACK-AND-TRACE SYSTEM REQUIREMENTS FOR PRODUCT IN LICENSEE'S POSSESSION AT THE TIME OF ANNUAL LICENSE ISSUANCE

VI. System Requirements for Products in Licensee Possession When Annual License is Issued.

A. Assignment Within Thirty (30) Days. Within 30 business days of receipt of the UIDs ordered, Personnel shall enter into the track-and-trace system and assign and apply a UID to:

- Each existing immature plant lot,
- Each individual mature plant, and
- All non-manufactured cannabis products physically located on the licensed premises.

B. Assignment after Thirty (30) Days. After the 30-day time frame referenced in subsection A above expires, all cannabis at the licensed premises shall be entered into the track-and-trace system starting with:

- Seed,
- Clone propagated onsite or purchased from a licensed nursery, or
- Seeding purchased from a licensed nursery.

REQUIREMENTS FOR NURSERIES

VII. Requirements for Nurseries. In addition to all other requirements described in the SOPs, Nurseries shall adhere to the following regulations.

A. Labeling Requirements.

1. **Tagging Mature Plants.** Nurseries producing seed for distribution shall tag all mature plants pursuant to Section V of the SOPs.¹¹
2. **Prohibitions on Distributions.** All products except seed, derived from these plants are prohibited from entering the commercial distribution chain;

B. Research and Development Requirements.

1. **Designated Areas for Mature Plants.** Nurseries may maintain a research and development area, as identified in their cultivation plan, for the cultivation of mature plants.
2. **Tagging.** All mature plants shall be tagged with a UID pursuant to Section V of the SOPs.
3. **Prohibitions on Distributions.** All products derived from these plants are prohibited from entering the commercial distribution chain.

¹¹ Section V: "Track-and-Trace System Unique Identifiers."

RECORDS RETENTION

VIII. **Records Retention in General.** The term “record” includes all records, applications, reports, or other supporting documents required by the CDFA.

- A. **Seven (7) Years Retention Period.** Personnel shall keep and maintain the records listed in subsection (D) for at least 7 years from the date the document was created.
- B. **Easily Accessible.** Personnel shall keep records in a manner that allows them to be provided at the licensed premises or delivered to the CDFA upon request.
- C. **Subject to Review.** All records are subject to review by the CDFA during standard business hours, or at any other reasonable time or as otherwise mutually agreed by the CDFA and Licensee.
 - 1. **Standard Time.** Standard business hours are deemed to be 8:00am – 5:00pm (Pacific Standard Time).
 - 2. **Prior Notice Not Required.** Prior notice by the CDFA to review records is not required.
- D. **Designated Records.** Personnel shall maintain the following records on the licensed premises, including, but not limited to:
 - 1. CDFA issued cultivation license;
 - 2. Cultivation plan;
 - 3. All records evidencing compliance with the environmental protection measures;
 - 4. All supporting documentation for data or information input into the system;
 - 5. All UIDs assigned to product in inventory and all unassigned UIDs;
 - UIDs associated with product that have been retired from the system must be retained for six (6) months after the date the tags were retired;
 - 6. Financial records, including but not limited to, bank statements, tax records, sales invoices, and sales receipts;
 - 7. Personnel records, including each employee’s full name, social security, or individual tax payer identification number, date of beginning employment, and date of termination of employment if applicable;
 - 8. Records related to employee training for track-and-trace system. Records shall include, but are not limited to:

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- The date(s) training occurred,
- Description of the training provided, and
- The names of the employees that received the training;

9. Contracts with other state licensed cannabis business;
10. Permits, licenses, and other local authorizations to conduct Licensee's commercial cannabis activity;
11. Security records; and
12. Records associated with composting or disposal of cannabis waste;
13. Documentation associated with loss of access to the track-and-trace system.

E. **Maintenance Protocol.** All records shall be prepared and retained in accordance with the following conditions:

1. Records shall be legible; and
2. Records shall be stored in secured area where they are protected from: Debris, Moisture, Contamination, Hazardous waste, Fire, and Theft.

SALES INVOICE OR RECEIPT REQUIREMENTS

IX. Sales Invoice or Receipt Requirements.

- A. **Invoices to Another Licensee.** Personnel shall prepare a sales invoice or receipt for every sale or transport of cannabis or non-manufactured cannabis product to another licensee.
- B. **Electronic Invoices.** Sales invoices and receipts may be retained electronically but must be readily accessible for examination by the CDFA, other state authorities, any state or local law enforcement authority, and the California Department of Tax and Fee Administration.
- C. **What's included.** Each sales invoice or receipt shall include the following:
1. Name, business address, and department issued license number of the *seller*;
 2. Name, business address, and department issued license number of the *purchaser*;
 3. Date of sale or transfer (month, day, and year). The date of any sale or transfer of cannabis and non-manufactured cannabis products shall be the date of transfer to the licensee receiving it;
 4. Invoice or receipt number;
 5. Weight (wet weight or net weight) or quantity of cannabis and non-manufactured cannabis products sold;
 6. Cost to the purchaser, including any discount applied to the total price;
 7. Description for each item including strain or cultivar, and all applicable information below
 - Plant;
 - Flower;
 - Leaf;
 - Shake;
 - Kief; and
 - Pre-rolls
 8. Signature of the *seller*, or designated representative of the seller, acknowledging accuracy of the cannabis and non-manufactured cannabis products being shipped;
 9. Signature of the *purchaser*, or designated representative of the purchaser, acknowledging receipt or rejection of the cannabis or non-manufactured cannabis products.
- D. **Prohibition of Product Returns.**¹² Licensees are prohibited from accepting returns of cannabis plants or non-manufactured cannabis products after transferring possession of cannabis plants or non-manufactured cannabis to another licensee after testing is performed.

¹² Prohibition of Product Returns is pursuant to Section 26110 of Business and Professions Code.

SALES INVOICE/ SHIPPING MANIFEST

PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER:			
ATTACHED PAGE(S)?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	# OF ATTACHED PAGES: <input style="width: 40px;" type="text"/>

ACTUAL DATE AND TIME OF DEPARTURE:	/ /					AM PM
ESTIMATED DATE AND TIME OF ARRIVAL:	/ /					AM PM

SHIPPER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
BUSINESS ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

RECEIVER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
DELIVERY ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

DISTRIBUTOR INFORMATION			
STATE LICENSE #		DRIVER'S NAME	
BUSINESS NAME		CA DRIVER'S LICENSE#	
STREET ADDRESS		VEHICLE MAKE	
CITY, STATE, ZIP		VEHICLE MODEL	
PHONE NUMBER		VEHICLE LIC. PLATE #	
CONTACT NAME		ACTUAL DATE AND TIME OF ARRIVAL:	/ / AM PM

PRODUCT SHIPPED DETAILS							
SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES ONLY THE SHADED COLUMNS BELOW (Please attach additional pages, if needed)							
UIC TAG NUMBER (IF APPLICABLE)	ITEM NAME AND PRODUCT DESCRIPTION (INCLUDE WEIGHT OR COUNT)	QTY ORDERED	QTY REC'D	UNIT COST	TOTAL COST	RETAIL ONLY	
						UNIT RETAIL VALUE	TOTAL RETAIL VALUE

PRODUCT REJECTION	
IF PRODUCTS ARE REJECTED, PLEASE CIRCLE THE ITEMS BEING REJECTED IN THE PRODUCT SHIPPED DETAILS SECTION ABOVE	
REASON FOR REJECTION:	

PRODUCT RECEIPT CONFIRMATION		
<p>I CONFIRM THAT THE CONTENTS OF THIS SHIPMENT MATCH IN WEIGHT AND COUNT AS INDICATED ABOVE. I AGREE TO TAKE CUSTODY OF ALL ITEMS AS INDICATED RECEIVED ABOVE -- AND WHICH ARE NOT CIRCLED. THE PRODUCTS CIRCLED ABOVE ARE REJECTED FOR DELIVERY AND REMAIN IN THE CUSTODY OF THE DISTRIBUTOR FOR RETURN TO THE SHIPPER AS INDICATED ON THIS FORM AND ALL ATTACHED PRODUCT DETAILS SHEET(S).</p>		
NAME OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		PHONE NUMBER:
SIGNATURE OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		DATE SIGNED:

SALES INVOICE / SHIPPING MANIFEST
PRODUCT DETAILS ATTACHMENT PAGE

PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER		ATTACHED PAGE		OF	TOTAL PAGES
ATTACHED TO:					

PRODUCT SHIPPED DETAILS

SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES ONLY THE SHADED COLUMNS BELOW
(Please attach additional pages, if needed)

[illegible]

PRODUCT REJECTION

IF A PRODUCT(S) ARE REJECTED, PLEASE CIRCLE THE ITEMS BEING REJECTED IN THE PRODUCT SHIPPED DETAILS SECTION ABOVE

REASON FOR REJECTION:

PRODUCT RECEIPT CONFIRMATION

I CONFIRM THAT THE CONTENTS OF THIS SHIPMENT MATCH IN WEIGHT AND COUNT AS INDICATED ABOVE.
I AGREE TO TAKE CUSTODY OF ALL ITEMS AS INDICATED RECEIVED ABOVE - AND WHICH ARE NOT CIRCLED.
THE PRODUCTS CIRCLED ABOVE ARE REJECTED FOR DELIVERY AND REMAIN IN THE CUSTODY OF THE DISTRIBUTOR FOR RETURN TO THE
SHIPPER AS INDICATED ON THIS FORM.

THIS PRODUCT DETAILS ATTACHMENT PAGE IS ATTACHED TO INVOICE #

NAME OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		PHONE NUMBER:	
SIGNATURE OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		DATE SIGNED:	

DISASTER RELIEF REQUIREMENTS

X. Disaster Relief Requirements.

A. **Requesting Relief.** If Licensee is unable to comply with any licensing requirements due to a disaster, Personnel may notify the CDFA and request relief from those requirements.

1. **Disaster Defined.** "Disaster" is defined as a:

- Fire;
- Flood;
- Storm;
- Tidal wave;
- Earthquake; or
- Similar public calamity, whether or not resulting from natural causes when the Governor or State of California has declared a state of emergency.

B. **Relocating Cannabis for Safety Purposes.** Notwithstanding subsection (A) above, Licensee may move cannabis and non-manufactured cannabis products stored on the premises to another location immediately to prevent loss, theft, or degradation, without obtaining prior approval from the CDFA if the Licensee complies with the following:

1. **Secure Location.** The cannabis and non-manufactured cannabis products are moved to a secure location where access to cannabis can be restricted to the Licensee, its employees, and contractors.
2. **Notification to CDFA.** Personnel shall notify the CDFA in writing that the cannabis and non-manufactured cannabis products have been moved and that the Licensee is requesting relief from complying with specific licensing requirements pursuant to subsection (A) within twenty-four (24) hours of moving cannabis.
3. **Access to CDFA.** Personnel shall provide the CDFA access to the location where the cannabis and non-manufactured cannabis products have been moved to for inspection; and
4. **Temporary Relief.** Personnel submits in writing to the CDFA within ten (10) calendar days of moving the cannabis and non-manufactured cannabis products a request for temporary relief that clearly indicates what the statutory regulatory sections relief is requested from, the time period for which the relief is requested, and the reasons relief is needed for the specified amount of time.

DIVERSION, THEFT, LOSS, OR CRIMINAL ACTIVITY

- XI. **Diversion, Theft, Loss, or Criminal Activity.** Licensee shall adhere to the following regulations regarding criminal activity.
- A. **Notifications.** Personnel shall notify the CDFA and law enforcement activities, within three (3) business days of discovery of any;
1. Diversion
 2. Theft,
 3. Loss of or criminal activity related to Licensee's cannabis or non-manufactured cannabis products.

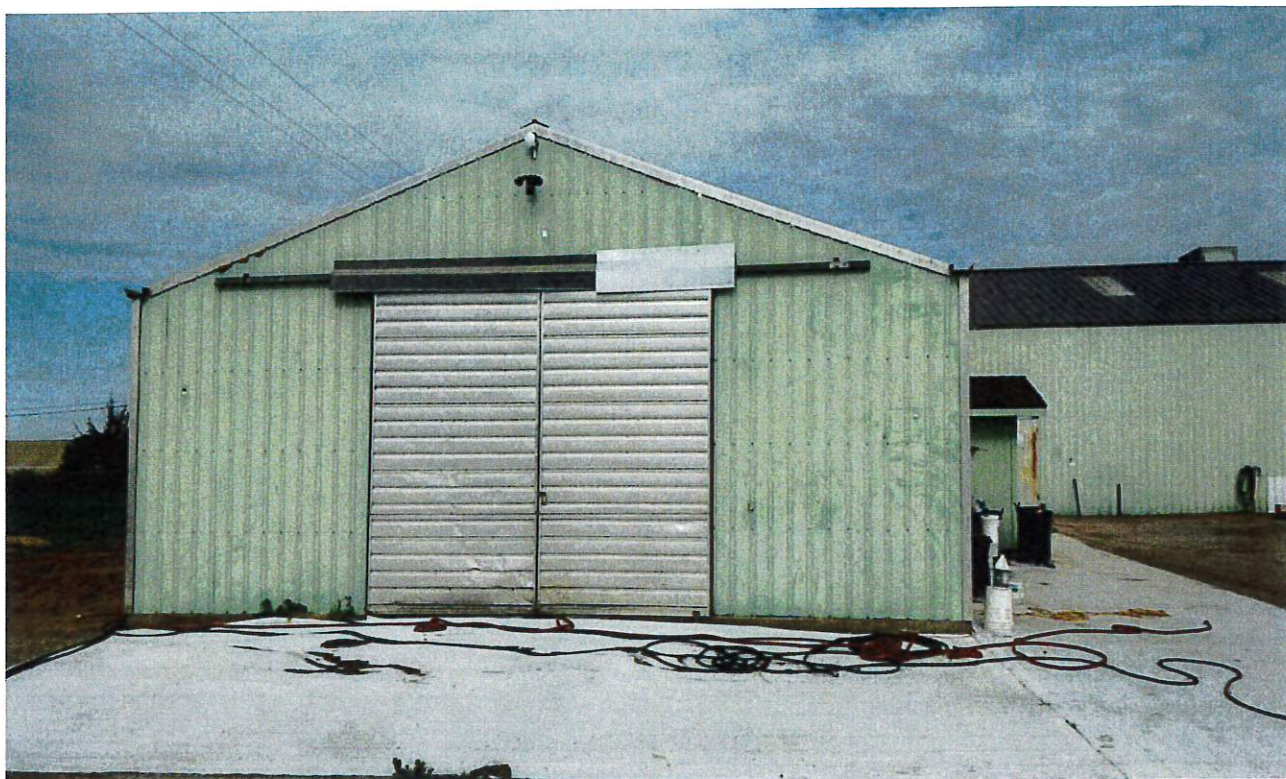
Existing Greenhouse Photos



Residence A – Side Elevation



Processing B – Side Elevation



Storage C – Front Elevation



Greenhouse H – Side Elevation



GENERAL DEVELOPMENT PLAN

Uses

Proposed Uses: Commercial Cannabis Activity as defined by Section 21.06.192 of the Monterey County Code, including:

- Mixed-light cannabis cultivation
- Mixed-light cannabis nursery
- Non-volatile manufacturing

There will be an on-site caretaker residing in Building A.

Hours of Operation

Hours of operations will be from 8am to 5pm daily.

Employees

There will be a maximum of forty (40) anticipated employees.

Proposed Parking

There are a total of 48 parking spaces, including 2 ADA and 46 standard parking spaces.

Traffic

Proposed project will remain an agricultural use. If there is no change in use and no significant building expansion, the project will not be required to evaluate potential traffic impacts.

Site Development Standards

Building setbacks for the Greenhouses and Processing Facility (Main Structures) will meet the requirements set forth in MCC Chapter 21.30 Farmlands of Front 30', Side 20' and Rear 20'.

The guard station, offices, and storage facilities (non-habitable Accessory Structures) will meet the required setbacks of Front 50', Side 6' and Rear 6'.

Applicant is requesting permission for Total Lot Coverage of 55%, which exceeds the maximum permitted coverage of 50% for commercial greenhouse operations.

Signs

Per Monterey County Code Section 21.60.080(B)(1), Applicant will display the following sign not to exceed 4 feet in height, attached to Building A:

QUAIL CREEK FARMS
26900 Encinal Road

Should Applicant determine additional signage is necessary, they will apply for any additional signs in accordance with MCC Chapter 21.60.

Landscaping Plan

There are a total of four (4) trash/recycling enclosures on the Property, between Greenhouses D and G (see "**Site Plan**").

Exterior Lighting

Exterior lighting will be affixed to all structures. Lights will be unobtrusive, motion-censored and directed downwards to light only the intended area.

Location

The Property is zoned F/40 Farmland.

The cannabis facility is not located within 600 feet from a school, public park, or drug recovery facility.

Permit History

Please see attached photos of greenhouses and industrial buildings permitted prior to January 1, 2016 ("**Existing Greenhouse Photos**").

Security Measures

Please see "**Security Plan**".

Pesticides/Fertilizer Usage

Pesticides and fertilizers will be properly labeled and stored to avoid contamination through erosion, leakage, or inadvertent damage from rodents, pests, or wildlife. The facility will obtain an Operator ID from the Agricultural Commissions office listing any pesticides/fertilizers that would be used. Please see "**Standard Operating Procedures.**"

Hazardous Materials

Ethanol will be used as a solvent for non-volatile manufacturing of cannabis distillates. Please see "**Hazardous Materials Questionnaire.**"

Water Conservation Measures

The applicant is in the process of working with the Environmental Health Bureau to ensure an uncontaminated water source, and mechanical equipment to support the proposed uses. To limit the water impacts related to cannabis cultivation, a point of use reverse osmosis system will be utilized for the facility. The system will not only enable recycling and reuse but will also virtually eliminate the risk of nitrate-rich runoff. The facility will incorporate a drip irrigation system. Please see "**Standard Operating Procedures.**"

Energy Efficiency

Sur Farms, LLC is a proposed Type 3B facility which will utilize greenhouse structures with natural light to cultivate the cannabis on the property. Wherever feasible Sur Farms, LLC will utilize LED lighting to reduce energy consumption. Sur Farms, LLC cannabis facility will use low watt LED lighting throughout the facility and utilize natural light within the greenhouse structures to address the projected energy demands for the facility. Please see **"Standard Operating Procedures."**

Total canopy area

Applicant is applying for 16 Type 2B Cultivation permits and 2 Type 4 Nursery Permits. Total cultivation canopy area will total 141,900 square feet. Please see **"Site Plan."**

Wastewater Treatment

A septic system will be utilized for wastewater treatment. Please see **"Septic Layout Plan."**

Waste Disposal

Recyclables will be separated from other solid waste generated on the premises and such recyclables will be placed into a different approved container to facilitate segregation at a solid waste facility pursuant to Monterey County Code 10.41. Sur Farms, LLC will contract with Monterey Regional Waste Management District (MRWMD) to have recyclable materials removed from the site.

Construction and demolition materials will be handled in accordance with Cal Green's requirements to divert at least 65% of waste to an approved recycling facility (effective January 1, 2017).

Sur Farms, LLC will use a waste to soil, soil reuse system to ensure they are not generating greater than 4 yards of organic solid waste per week.

Odor Prevention Measures

Building facilities and greenhouses will be equipped with a state of the art odor-scrubbing and carbon filtering air circulation and ventilation system to minimize odor. Any odors emitted by the cannabis inside the facility will be completely eliminated prior to being exhausted from the building by this system. Please see **"Standard Operating Procedures."**

Recordkeeping Policies/ Quality Control Measures

Please see **"Standard Operating Procedures."**

Monterey County Health Department
Environmental Health Bureau
1270 Natividad Road
Salinas, CA 93906
(831) 755-4507
Fax (831) 796-8698

Jurisdiction Name _____
Use Permit # _____
Or
Building Permit # _____
Contact Name _____
Phone # _____

HAZARDOUS MATERIAL QUESTIONNAIRE

Business Name Quail Creek Farms, Inc. Type of Business cultivation/nursery/non-volatile manufacturing
Site Location 26900 Encinal Road City Salinas APN: 131-061-026-000
Mailing Address _____
Business Contact Trent Sanders 707-986-7068
Name Phone Number
Property Owner Sur Farms, LLC/ Justin Donnelly 831-601-6039
Name Phone Number

1. Will your business/proposed project be using any hazardous materials such as oil, fuels, solvents, compressed gases, acids, corrosives, pesticides, fertilizers, paints or other chemicals?
☒ Yes ☐ No
2. Will your business/proposed project be using hazardous materials in quantities of 55 gallons and above for liquids, 500 lbs. and above for solids and/or 200 cubic feet and above for compressed gases?
☐ Yes ☒ No
3. Will your business/proposed project be using any quantities of acutely hazardous materials such as ammonia, chlorine, sulfuric acid, formaldehyde, hydrogen peroxide, methyl bromide or other restricted pesticides?
☐ Yes ☒ No
4. Will your business/proposed project be using underground storage tanks to store hazardous materials?
☐ Yes ☒ No
5. Will your business/proposed project be generating any quantities of hazardous waste such as waste oil, waste solvents, etc?
☒ Yes ☐ No
6. Will your business/proposed project be emitting any hazardous air emissions?
☐ Yes ☒ No

CERTIFICATION:

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and belief.

ANY QUESTIONS REGARDING THIS FORM CAN BE DIRECTED TO:

Monterey County Health Department
Environmental Health Bureau
1270 Natividad Road
Salinas, CA 93906
(831) 755-4507
Fax (831) 796-8698

Executed AT:

Monterey, CA

City, State

Print Name of Owner/Operator: Justin Donnelly

Signature of Owner/Operator: Justin Donnelly

For Local Jurisdiction Use Only:

1. Is there a known or proposed school, hospital, day care, or long term care facility within 1,000 feet of this site location?
☐ Yes ☒ No
2. Is there a known or proposed school, hospital, day care, or long term care facility ¼ mile of this site location?
☐ Yes ☒ No

Health Department Clearance

Signature: _____ Date: _____

Print Name and Title: _____

Air Pollution District Clearance

Signature: _____ Date: _____

Print Name and Title: _____

Monterey County Health Department
Environmental Health Bureau
1270 Natividad Road
Salinas, CA 93906
(831) 755-4507
Fax (831) 796-8698

Jurisdiction Name _____
Use Permit # _____
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☐ Yes ☒ No
5. Will your business/proposed project be generating any quantities of hazardous waste such as waste oil, waste solvents, etc?
☒ Yes ☐ No
6. Will your business/proposed project be emitting any hazardous air emissions?
☐ Yes ☒ No

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For Local Jurisdiction Use Only:

1. Is there a known or proposed school, hospital, day care, or long term care facility within 1,000 feet of this site location?
☐ Yes ☒ No
2. Is there a known or proposed school, hospital, day care, or long term care facility ¼ mile of this site location?
☐ Yes ☒ No

Health Department Clearance

Signature: _____ Date: _____

Print Name and Title: _____

Air Pollution District Clearance

Signature: _____ Date: _____

Print Name and Title: _____

QUAIL CREEK FARMS, INC.
Standard Operating Procedures (SOPs)

Manufacturing

TABLE OF CONTENTS

GOOD MANUFACTURING PRACTICES

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GENERAL REQUIREMENTS FOR PERSONNEL

Before coming into direct contact with cannabis products, cannabis product contact surfaces, and cannabis product packaging materials, please adhere to the following:

A. All Personnel must:

- Wash hands thoroughly before starting work, after each absence from any work station, and at any time when the hands may have been soiled or contaminated;
- Sanitize hands when necessary to protect against undesirable microorganisms;
- Wear appropriate outer garments to protect against allergen cross-contact;
- Remove all unsecured jewelry. Jewelry that cannot be removed may be covered with appropriate materials which must be maintained in an intact, clean and sanitary condition.
- Maintain any gloves used in cannabis product handling in a clean and sanitary condition;
- Wear hair nets, headbands, caps, beard covers, or other hair restraints where necessary;
- Store clothing or other personal belongings in areas separate from those where cannabis products are exposed or where equipment or utensils are washed;
- Confine eating food, chewing gum, drinking beverages, and/or using tobacco to areas separate from cannabis/cannabis products;
- Maintain adequate personal cleanliness;
- Take any other necessary precautions to protect against allergen cross-contact and against contamination of cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials by microorganisms or foreign substances (including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin).

WARNING. Personnel who are shown or appear to have, an illness, open lesion (such as boils, sores, or infected wounds), or any other source of microbial contamination presenting a reasonable threat of contamination to cannabis products, contact surfaces, or packaging materials, must be excluded from any related manufacturing operations until his or her health condition is corrected. These conditions must otherwise be covered by impermeable materials. Personnel are required to report any of the foregoing conditions to their supervisor(s).

HEALTH AND SAFETY REGULATIONS

I. Sanitary Conditions.

A. Building, fixtures and other physical facilities.

- Clean floors and walls at the end of each production day.
- Clean doors, door handles, and bathrooms at least once per week.
- Clean ceilings as needed.
- Sanitize designated areas with uncontaminated water (bleach water or equal).
- Erect "Wet Floor" signage as needed.
- Sweep up and discard of any debris.

B. Work Surfaces.

- Keep cannabis-contact surfaces in a clean, dry, and sanitary, condition before use.
- After each task, sanitize work surfaces with cleaning solution, alcohol or bleach water.
- When surfaces are wet-cleaned, make sure they are thoroughly dried before subsequent use.

C. Equipment and Utensils.

- Remove all product debris from equipment as necessary.
- Rinse and sanitize equipment with uncontaminated water.
- Reassemble all equipment after it has thoroughly been cleaned.
- Designated supervisor must perform a daily sanitation inspection of all equipment and utensils after it has been cleaned, sanitized, and reassembled.
- Immediately dispose of single-service articles after use (i.e. paper cups and paper towels)
- The non-cannabis product-contact surfaces of equipment must be cleaned thoroughly and at least once a week

D. Recycling, Compost and Garbage.

- Remove and properly dispose of accumulated recycling, compost, and garbage as needed.
- Clean garbage and recycling containers after emptying out its contents.
- Use trash liner bags.

II. Record Keeping. Record the dates of production area cleaning on a Cleaning Log.

III. Corrective Action. If the supervisor finds that the facilities, equipment or utensils do not pass the required inspection, repeat cleaning procedures and inspections as needed.

CLEANING COMPOUNDS AND SANITIZING AGENTS

All Personnel must adhere to the following:

A. The following toxic materials may be used or stored when cleaning the facility, equipment and utensils:

- Phthalates
- Perchloroethylene or "PERC"
- Triclosan
- Butoxyethanol
- Ammonia
- Chlorine
- Sodium Hydroxide

B. How to properly store containers of toxic materials.

- Ensure that the storage area is clearly identified with warning signs, is clear of obstructions, and is accessible only to trained and authorized personnel.
- Inspect all incoming containers to ensure that they are undamaged and are properly labeled. Do **NOT** accept delivery of defective containers.
- Be sure to store toxic materials in the appropriate type of containers recommended by the manufacturer or supplier.
- Keep the amount of toxic materials in storage as small as possible.
- Inspect storage areas and containers regularly for any deficiencies, including leaking or damaged containers, expired shelf-life or poor house-keeping.
- Ensure that containers are tightly closed when not in use.
- Empty containers may contain hazardous toxic residue. **KEEP CLOSED.**
- Store containers at a convenient height for handling, below eye level if possible.
- Store material within the temperature range recommended by the chemical manufacturer/supplier.
- To contain spills or leaks, the toxic material containers should be stored in trays made of compatible materials.

QUALITY OF RAW MATERIALS AND INGREDIENTS

All Personnel must adhere to the following:

- Inspect and segregate raw materials and ingredients as necessary to ensure that they are clean and suitable for processing into cannabis products.
- Store raw materials and ingredients in areas that protect against allergen cross-contact and contamination.
- Wash and clean raw materials and ingredients as necessary to remove soils and other contaminants.
- Pasteurize all raw materials and ingredients.
- Store raw materials and ingredients in bulk or in containers designed and constructed to protect against allergen contact or contamination.
- Store raw materials and ingredients at appropriate temperatures and relative humidity.
- Keep materials frozen as required.

TRACK-AND-TRACE SYSTEM

Personnel shall adhere to the following:

I. General Requirements.

A. Track-and-trace account manager shall:

- Ensure all information entered into the track-and-trace system is accurate and complete;
- Require users to be trained in the proper and lawful use of the track-and-trace system;
- Maintain an accurate and complete list of all track-and-trace system account managers and users and update the list immediately upon any change;
- Ensure that each track-and-trace account manager and user has a unique log-on, consisting of a username and password; log-on may not be shared with anyone;
- Cancel any track-and-trace system account manager or user from a track-and-trace system account if the individual is no longer the Licensee's Personnel;
- Obtain UID tags from the Department of Food and Agriculture, or its designee, and ensure that a sufficient supply of UID's is available at all times;
- Ensure that all inventory is tagged and entered in the track-and-trace system;
- Correct any information that is entered into the track-trace system in error within three (3) business days of discovery of the error;
- Immediately report any evidence of theft or diversion;
- Monitor all notifications from the track-and-trace system and resolve all issues identified in the notification. Account managers may not dismiss any notifications until the issue(s) have been resolved.

II. Reporting Requirements.

A. An account manager or user shall record all the following activities in the track-and-trace system within 24 hours of the activity:

- The receipt of cannabis material;
- The transfer to or receipt of cannabis products for further manufacturing from another Licensed manufacturer;

- The following changes in the disposition of cannabis or cannabis product:
 - Processing of the cannabis or further processing of the cannabis product;
 - Packaging cannabis products;
 - Transfer of cannabis products to a distributor;
 - Any other activity required by the track-and-trace system to be captured.
- B. Personnel shall record the following *information* for each activity:
- The licensed entity from which the cannabis material or product is received, including that entity's license number, and the licensed entity to which the cannabis product is transferred, including the entity's license number;
 - The name and license number of the distributor that transported the cannabis material or cannabis product;
 - The type of cannabis material or cannabis product received, processed, manufactured, or transferred.
 - The weight or count of the cannabis material or cannabis product received, processed, packaged, or transferred.
 - The date of receipt, processing, packaging, or transfer.
 - The unique identifier assigned to the cannabis material or cannabis product.

III. **Loss of Access.**

- A. In case that access to the track-and-trace system is lost, Personnel shall:
- Prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access;
 - Enter all inventory tracking activities that occurred during the loss of access into the track-and-trace system within three (3) business days upon restoration of access;
 - Document the date and time when access to the track-and-trace system was lost and when it was restored and the cause for each loss of access;
 - Not transfer cannabis products to a distributor until access to the system is restored and all information is recorded into the track-and-trace system.

INVENTORY CONTROL

Personnel shall adhere to the following:

I. General Requirements.

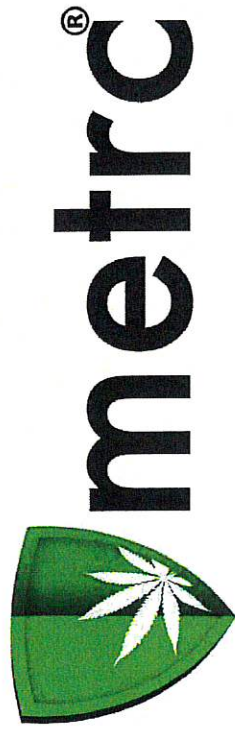
- A. Reconcile all inventories of cannabis and cannabis products at least once per week.
- B. Keep an inventory log, containing the following information:
 - Where the cannabis material or product originated and license number of the cultivator or other licensed manufacturer;
 - Date of physical transfer to Licensee;
 - Time the cannabis material or product arrived at the premises;
 - Unique identifiers of all cannabis material or product;
 - Total weight or amount of the cannabis material or product;
 - Where on the premises cannabis material or product is kept;
 - The storage conditions of the cannabis material or product;
 - The best-by, sell-by, or expiration date of the cannabis material or product;
 - Shipping manifests and bills of lading;
 - A copy of the service or sale contract pertaining to the cannabis material or product;
 - Warehouse receipts.
- C. Conduct an audit in case of a discrepancy between the inventory and the track-and-trace database.
- D. Notify the Department within 24 hours if an audit reveals a discrepancy that is not within 5% of the documented inventory.

WASTE MANAGEMENT

Personnel must adhere to the following:

A. Procedure.

- Dispose of cannabis waste in a secured waste receptacle inside building.
- Designated receptacle or area will not be accessible to the public.
- Do not dispose of any cannabis products in their original packaging.
- Before disposing of any cannabis products, ensure that they are unrecognizable and unusable.
- Enter cannabis waste and/or cannabis products into the track-and-trace system.



Introduction to California Cannabis Track-and-Trace System

Scott Denholm
Executive Director Metrc

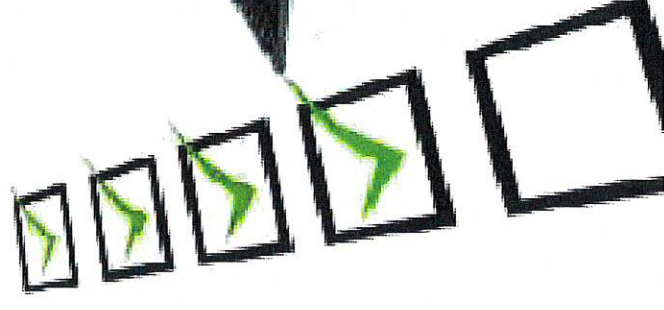


BUREAU OF
CANNABIS
CONTROL
CALIFORNIA



Agenda

- Who is Franwell?
- Introduction to Metrc
- Working with Metrc
 - Obtaining User Access
 - Tags and Tracking
 - Plants
 - Packages
 - Manufacturing
 - Transfers
 - Laboratory Testing
 - Retail Sales
 - Reports
- RFID, What and Why
- Integration with other Software
- Support



Who is Franwell?

- 25+ years of business experience in (high flow & volume) supply chain processes & tracking
- 30+ years of experience in computer technologies
- 15+ years focused on auto identification technology (Barcode, RFID, etc.)
- Current Statistics:
 - Over **53,000** Industry users enrolled
 - Over **200** State users
 - Over **11,501,800** plants commissioned
 - Over **8,527,139** packages tracked
 - Over **1,421,585** travel manifests processed



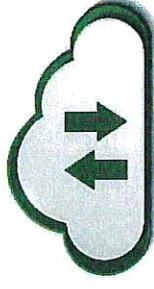
HEALTHY MARYLAND
Maryland Medical Cannabis Commission

Introduction to Metrc



Scope

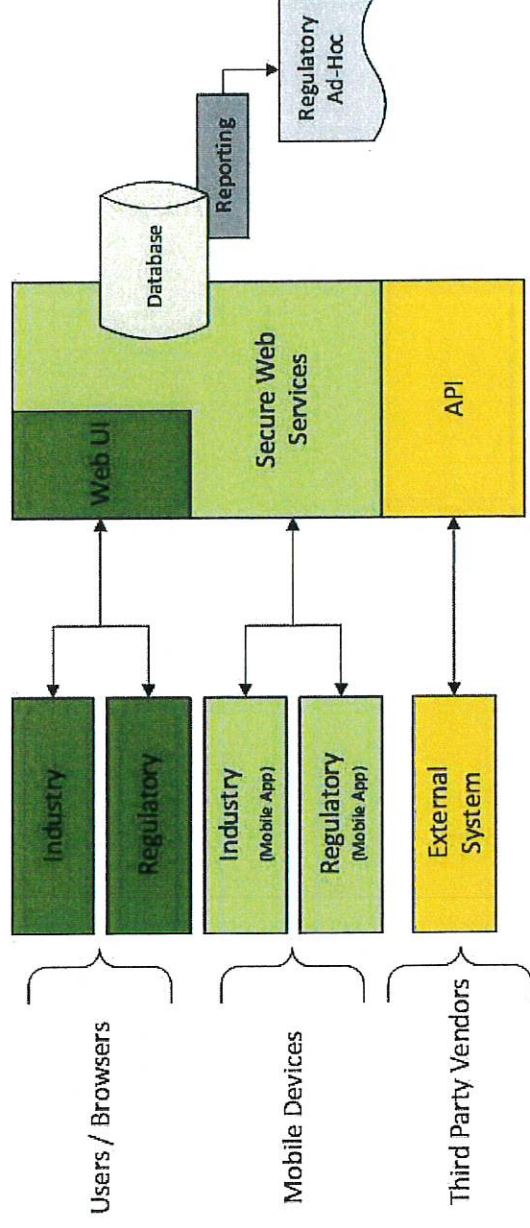
- Metrc® is a compliance management solution used by regulatory bodies for the oversight of the cannabis industry.
- Metrc is a cloud hosted on-line software reporting system used by licensed cannabis businesses to manage and report supply chain activities as required by State rules.



- CCTT-Metrc is California's implementation of Metrc (metrc.com/California)

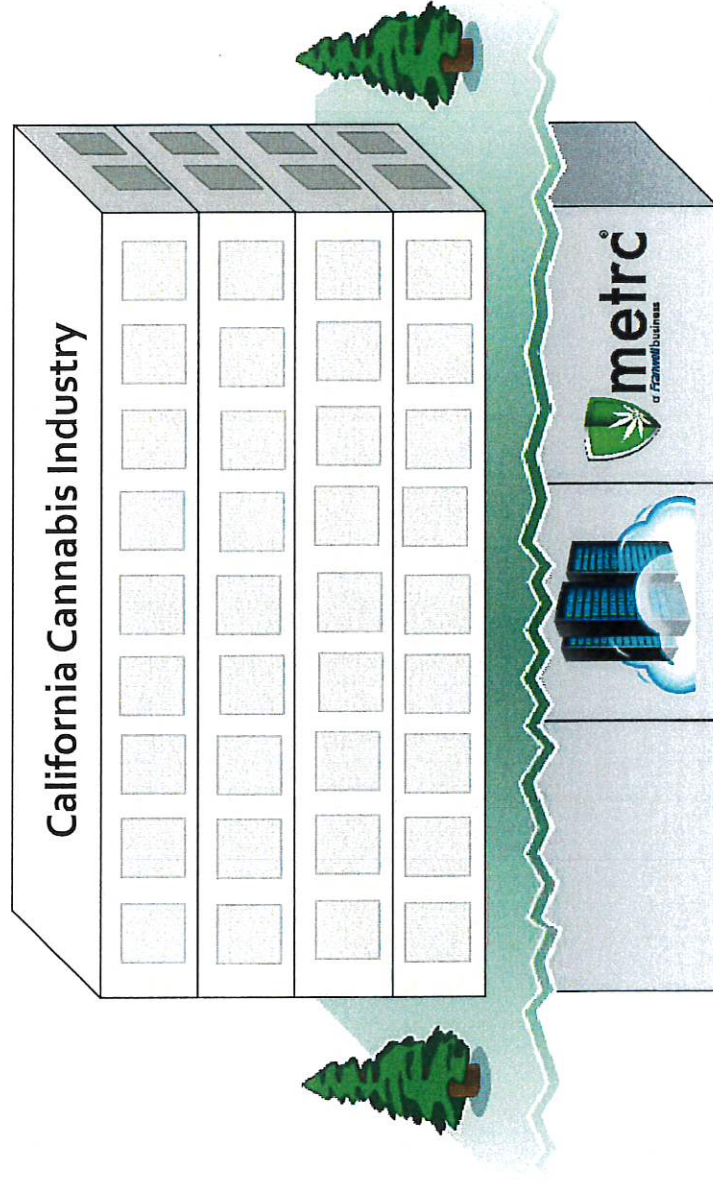
What Makes up Metrc?

- The system consists of:
- A web application
- Web services
- A mobile application for site inspection
- A mobile application for industry use

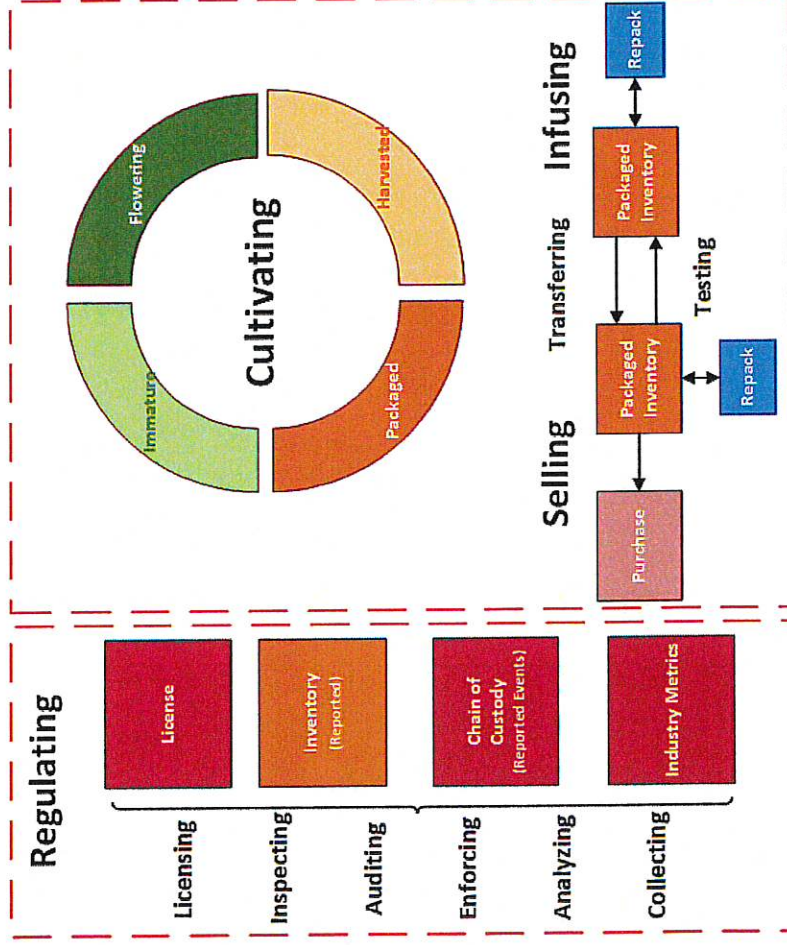


How Metrc is Built

- Private dedicated hardware
- Secure on-line access
- Real-time with data backup and failover



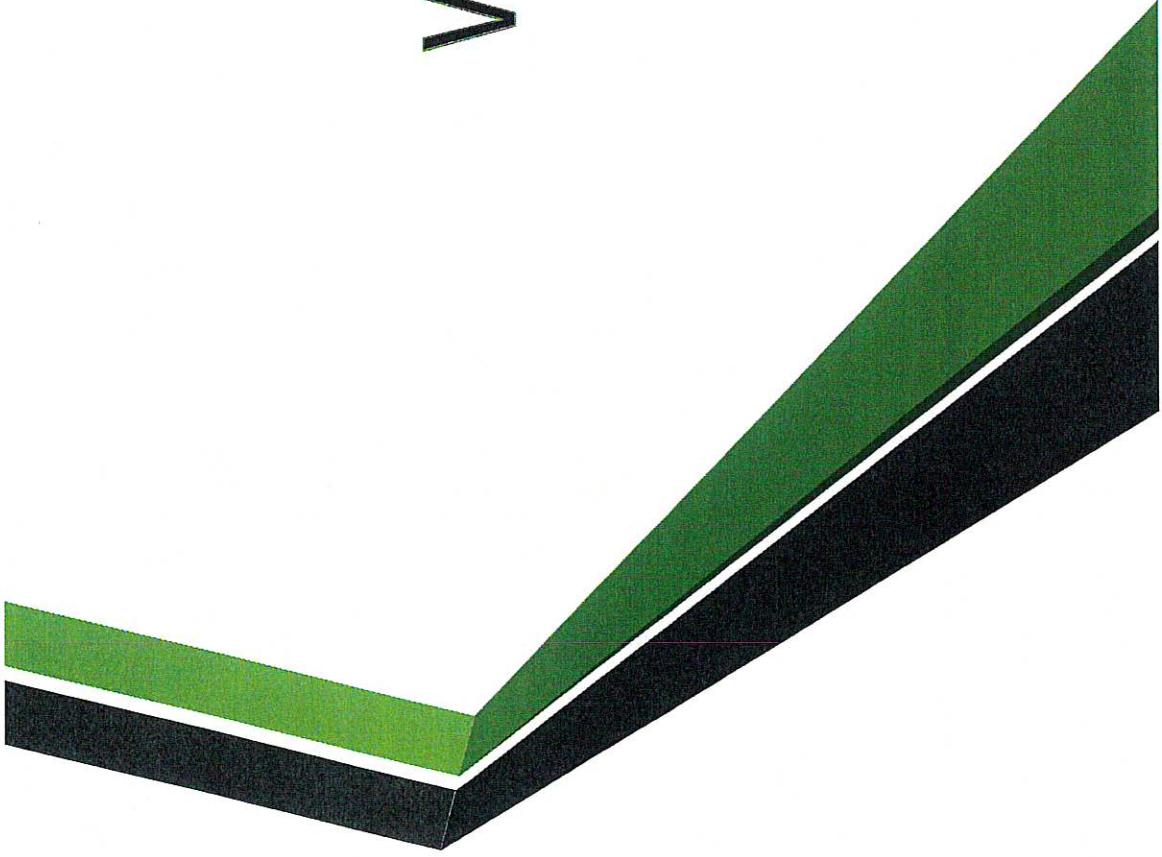
How Metrc is Organized



- "Immaturo plant" or "immaturo" means a cannabis plant that is not flowering.
- "Flowering" means that a cannabis plant has formed a mass of pistils measuring greater than one half inch wide at its widest point.



Working with Metro



Obtaining User Access

- Submit your Annual license application and take the required training
- Obtain approval of Annual license
- Call or email Metrc Support to receive confirmation of Annual license and training completion
- Follow these steps to complete your login credentials upon receipt of welcome email:
 - Click on the first link in the "Welcome to Metrc" email. You will be directed to the website.
 - Accept State Attestation and Metrc Terms and Conditions
 - Setup a User Profile



Welcome to metrc!

Log-in and set your password here: <https://ca.metrc.com/first-time?key=81zn6IRIW4045ch-u8aLVuxBabFd7bW>

First Time log-in key: v81zn6IRIW-4045ch-u8aLVuxBabFd7bW

Once your password is set, you will log-in here: <https://ca.metrc.com/>.



Setup Business Profile

For each license (facility) add:

1. Employees
2. Strains
3. Items
4. Rooms (Cultivators Only)

California Regulations can be accessed at:

California Department of Food and Agriculture (CDFA):
<http://cannabis.cdfa.ca.gov/>
 Cultivator licenses

Bureau of Cannabis Control (BCC): <http://www.bcc.ca.gov>
 Distributor, Retailer, Testing Laboratory and Microbusiness licenses

California Department of Public Health (CDPH):
<https://www.cdph.ca.gov/Programs/CEH/DFDCS/Pages/MCSB.aspx>
 Manufacturing licenses

Permissions for Each Type of License Facility

	Cultivator	Cultivator Processor Only	Distributor	Distributor Transporter Only	Manufacturer	Manufacturer Packager Only	Retailer	Testing Laboratory	Microbusiness
Plants	✓								✓
Packages	✓	✓	✓		✓	✓	✓	✓	✓
Packages - Remediation					✓	✓			✓
Packages - Test Product								✓	
Licensed Transfers	✓	✓	✓	✓	✓	✓	✓	✓	✓
Transfers Hub								✓	✓
Sales							✓		✓
Admin	✓	✓	✓	✓	✓	✓	✓	✓	✓
Reports	✓	✓	✓	✓	✓	✓	✓	✓	✓

Setup Product Profile

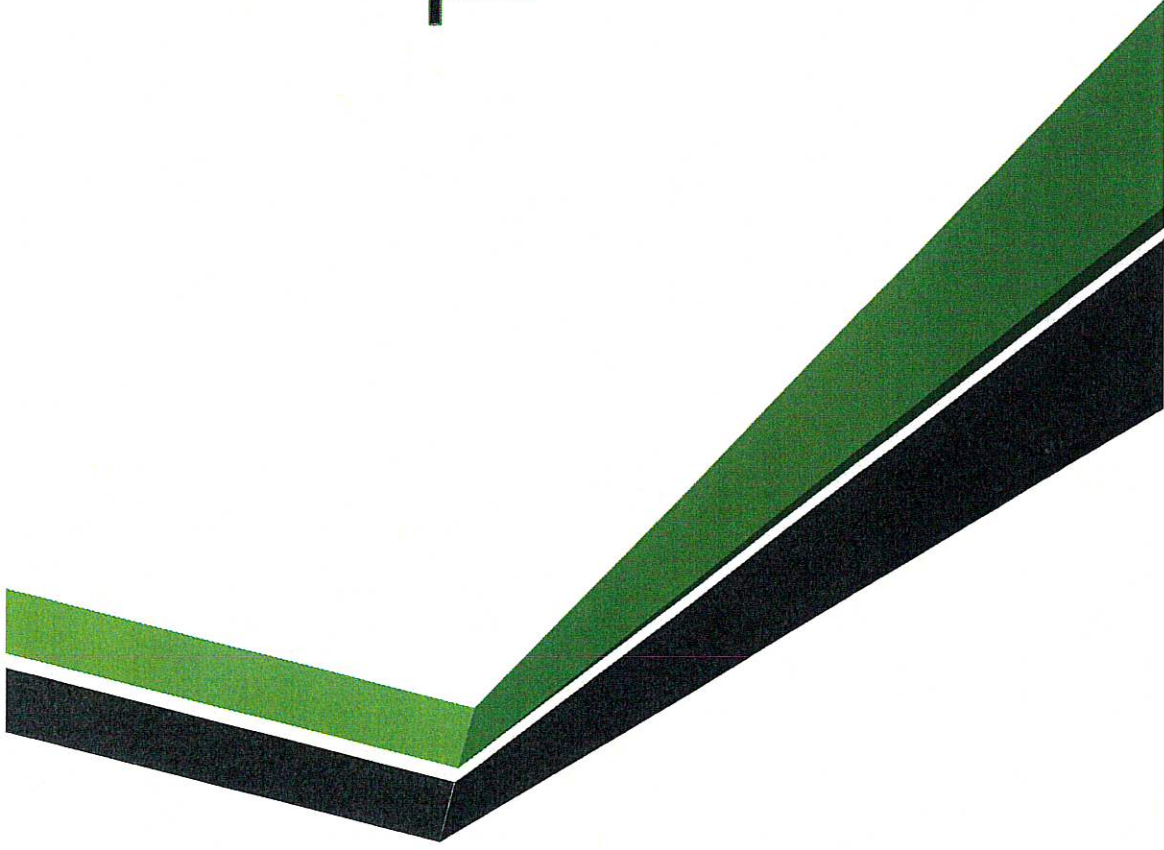
Categories

- Capsule/Tablet
- Concentrate (liquid)
- Concentrate (liquid each)
- Concentrate (solid)
- Concentrate (solid each)
- Edible
- Edible (each)
- Extract (liquid)
- Extract (liquid-each)
- Extract (solid)
- Extract (solid-each)
- Flower
- Fresh Cannabis Plant
- Immature Plant
- Kief
- Leaf
- Liquid
- Liquid (each)
- Pre-Roll Flower
- Pre-Roll Leaf
- Suppository (each)
- Tincture
- Tincture (each)
- Topical
- Topical (liquid)
- Topical (liquid-each)
- Topical (solid)
- Topical (solid-each)
- Vape Oil
- Vape Oil (each)

Items

- Item names are used to identify what type of item is packed into a package.
- Category
- Type of product
- Quantity
- Unit of measure
- Used for traceability and recalls if necessary.

Tags and Tracking

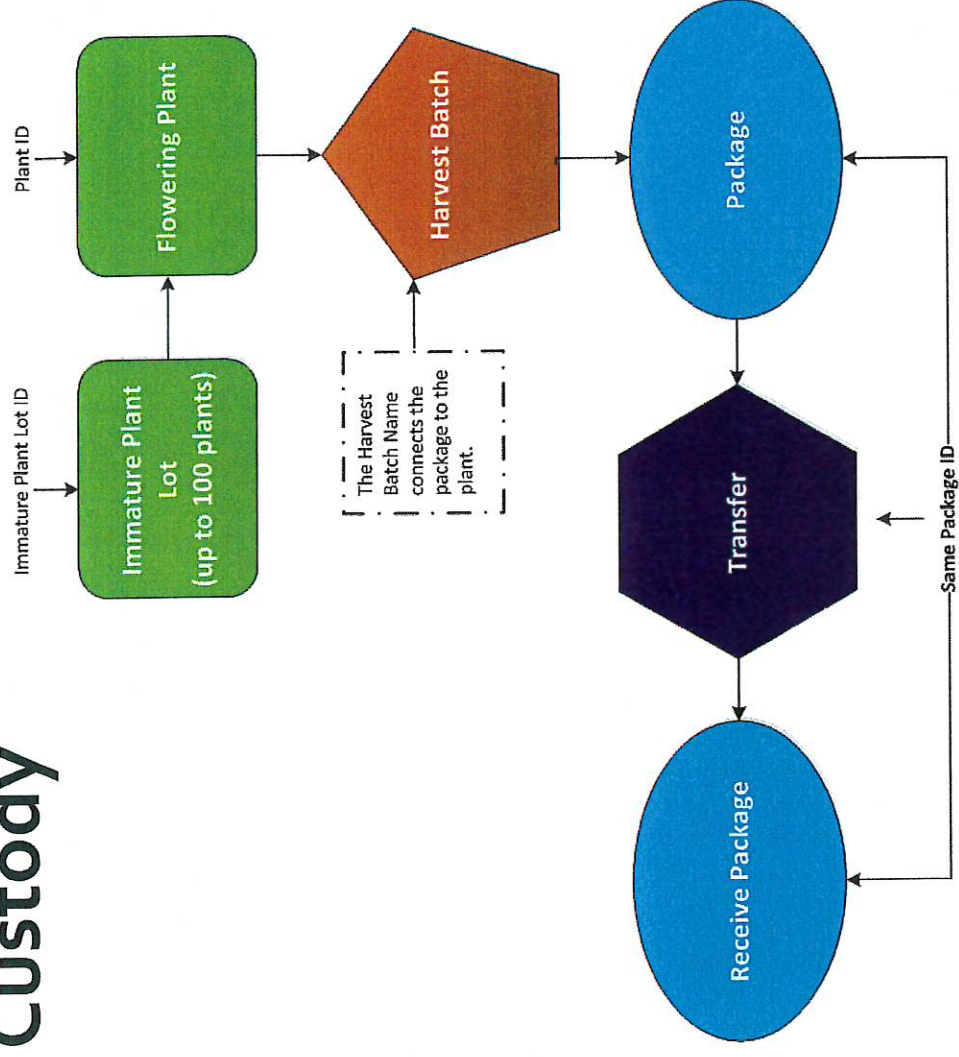


Tagged Inventory in Metrc

- There are two types of tagged inventory in Metrc: Plants and Packages.
 - ✎ Plants are immature or flowering. All plants must enter the system through immature plant lots (up to 100 plants / lot).
 - ✎ Immature plant lots (up to 100 plants) are assigned a Unique Identifier Plant tag.
 - ✎ Each immature plant must be labelled with the lot Unique Identifier (UID).
 - ✎ Individual flowering plants are assigned a Plant tag.
 - 📁 Packages are created from immature plants, harvest batches, testing lab samples, production batches, and other packages.
- Licensees order tags through Metrc (costs of tags are incorporated into the license fees).



Chain of Custody



Plant

License
(Facility)

License
Number

Identifier

Order Information

Unique Identification Number (UID)

Strain Name
Can be written

Metric Seal

Package

- Peel and stick – adhesive backing.
- Package tag is used for transferring packages and tracking of finished product for each licensee in the chain of custody.
- The package tag is perforated with the “Package ID #” printed on the upper and lower sections. (example: can be used for jar labeling in order to identify associated package).



Immature Plant Lot Tagging



- One UID (plant tag) is assigned to an Immature Plant Lot (up to 100 plants per lot).
- Each plant in the lot must be labelled with the corresponding UID.

Tag Attached to Flowering Plant

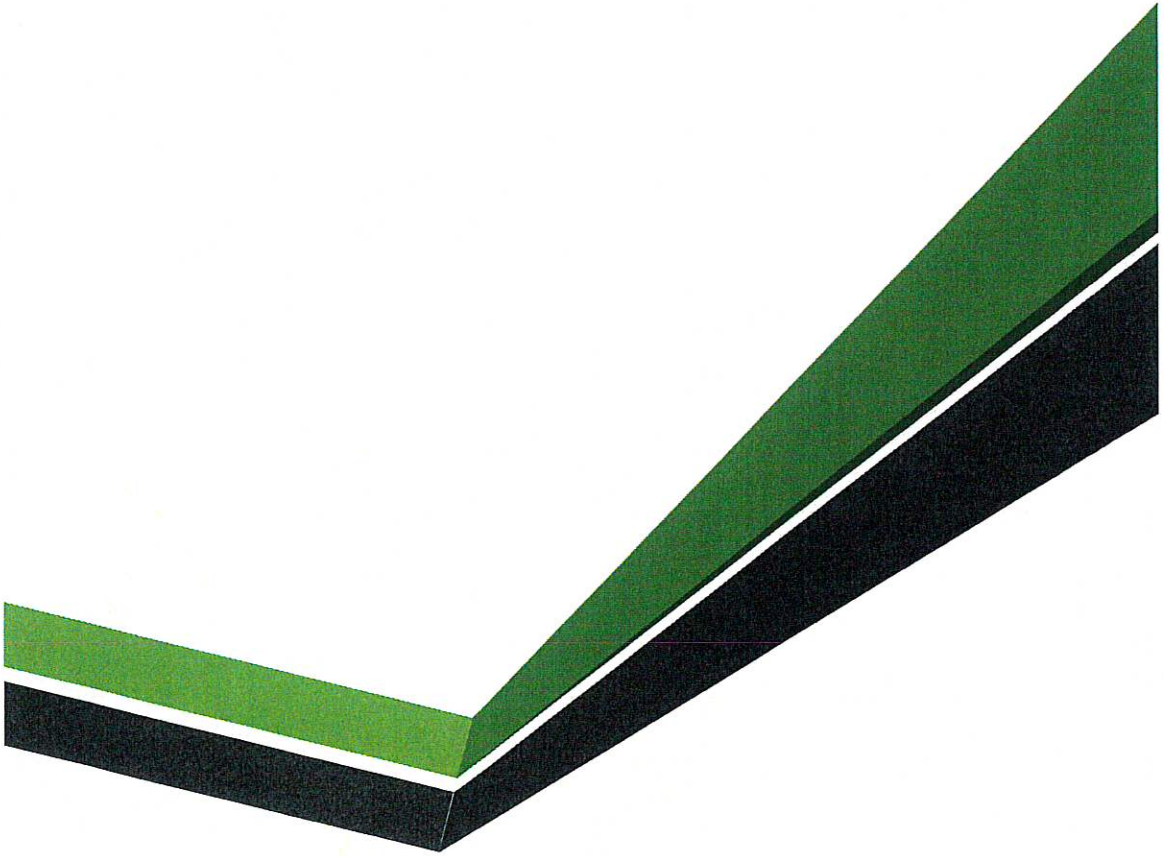
- Plant Tags are assigned to individual plants when moved to canopy or when plant flowers
- Must be attached to main stem at the base of each plant using a tamper evident strap or zip tie
- Must be visible and within clear view



Reminder

- "Immature plant" or "immature" means a cannabis plant that is not flowering.
- "Flowering" means that a cannabis plant has formed a mass of pistils measuring greater than one half inch wide at its widest point.

Plants



Plant Tracking

Each plant uniquely serialized

Complete event history

Each phase of plant life captured

Ability to replace tags, change rooms, record destroyed plants, record additives, record waste, and create plantings.

Each plant location captured

Plants

Immature	Inactive	Flowering	On Hold	Inactive	Additive	Waste	Harvested	On Hold	Inactive
<div style="display: flex; justify-content: space-between;"> <div> <div>Replace Tags</div> <div>Change Room</div> <div>Changes by Room</div> <div>Destroy</div> </div> <div> <div>Record Additives</div> <div>Record Waste</div> <div>Create Plantings</div> </div> <div> <div>Manure</div> <div>Harvest</div> </div> </div>									

Tag

1A4FF00000000200000133

Strain

9 Lb Hammer

Room

Flower Room 3

Hold

No

Group Date

11/06/2017

Phase Date

11/19/2017

Description	Employee	Date	Reported
Planted	John Jones (JonesS...)	11/06/2017	11/06/2017 03:05 pm
Plant moved to room "Immature Room 3"	John Jones (JonesS...)	11/18/2017	11/19/2017 08:17 pm
Changed Growth Phase to Flowering	John Jones (JonesS...)	11/18/2017	11/19/2017 08:17 pm
Attached tag 1A4FF00000000200000133	John Jones (JonesS...)	11/18/2017	11/19/2017 08:17 pm
Moved to room "Flower Room 3"	John Jones (JonesS...)	11/19/2017	11/19/2017 09:29 pm

Harvest Steps - Cultivator

- **Harvest Name** – Harvest name is required to be unique name. Strain Name & Harvest Date is recommended best practice.
- **Weight** – the plant in its entirety after being cut from root ball (stems, stalk, flower, leaves, trim, etc.)
- **Waste** – can be multiple entries but must be reported within 3 days after it is created. Waste may include stems, stalk, flower, leaf, trim, etc.
- **Package** – package with unique identifier (flower, leaf, kief, fresh cannabis plant, or pre-rolls)
- **Finish** – when Harvest Batch (HB) is completely done (packages created and waste calculated), click 'Finish'. Any remaining weight associated to the HB is considered moisture loss. Harvest must be completed within 60 days.
- **Transfer** – must create transfer manifest to move product (by a Distributor) to a Processor or Manufacturer or to a Distributor for testing and quality assurance prior to retail sale.



Harvest Tracking

Harvest details captured

Plants

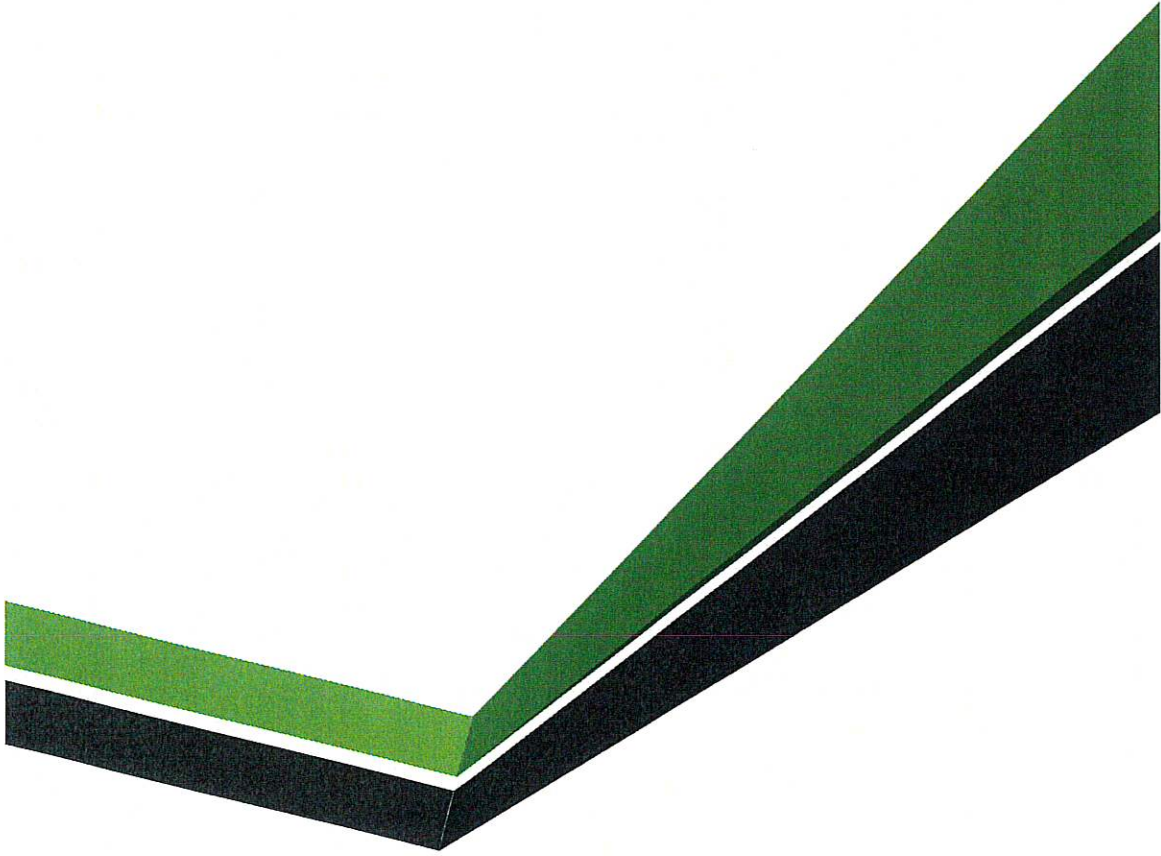
Immature	Inactive	Flowering	On Hold	Inactive	Additives	Waste	Harvested	On Hold	Inactive
<div> <div>Create Packages</div> <div>Report Waste</div> <div>Finish</div> </div>									
<div> <div>Harvest Batch *</div> <div>Room</div> <div>Strain</div> <div>Plants</div> <div>Wet Wgt.</div> <div>Waste</div> <div>Total Pkg'd</div> <div>Pkgs</div> <div>Weight</div> <div>Restored</div> </div>									
<div> <div>Q * 11/17/17 9 Lb Hammer</div> <div>Drying Room</div> <div>9 Lb. Hammer</div> <div>9</div> <div>120 oz</div> <div>0 oz</div> <div>0 oz</div> <div>0</div> <div>120 oz</div> <div>0 oz</div> </div>									
<div> <div>Q * 11/17/17 Lemon Slomp</div> <div>Harvest Room</div> <div>Lemon Slomp</div> <div>5</div> <div>100 oz</div> <div>1,0392 oz</div> <div>40 oz</div> <div>2</div> <div>59,5608 oz</div> <div>0 oz</div> </div>									
<div> <div>Q * 11/17/17 Mari 9lb Hammer</div> <div>Harvest Room</div> <div>9 Lb. Hammer</div> <div>5</div> <div>300 g</div> <div>0 g</div> <div>0 g</div> <div>0</div> <div>300 g</div> <div>0 g</div> </div>									

Package	Waste	History
John Jones (JonesS)		
Description	Employee	Date
Harvest created in room "Harvest Room"	John Jones (JonesS...)	11/17/2017
Manicured 100 Grams from Plant 1A4FF000000000000000000020	John Jones (JonesS...)	11/17/2017
Manicured 100 Grams from Plant 1A4FF000000000000000000021	John Jones (JonesS...)	11/17/2017
Manicured 25 Grams from Plant 1A4FF000000000000000000023	John Jones (JonesS...)	11/17/2017

Each harvest captured

All associated plant data captured

Packages



Packages in Metrc - Definition

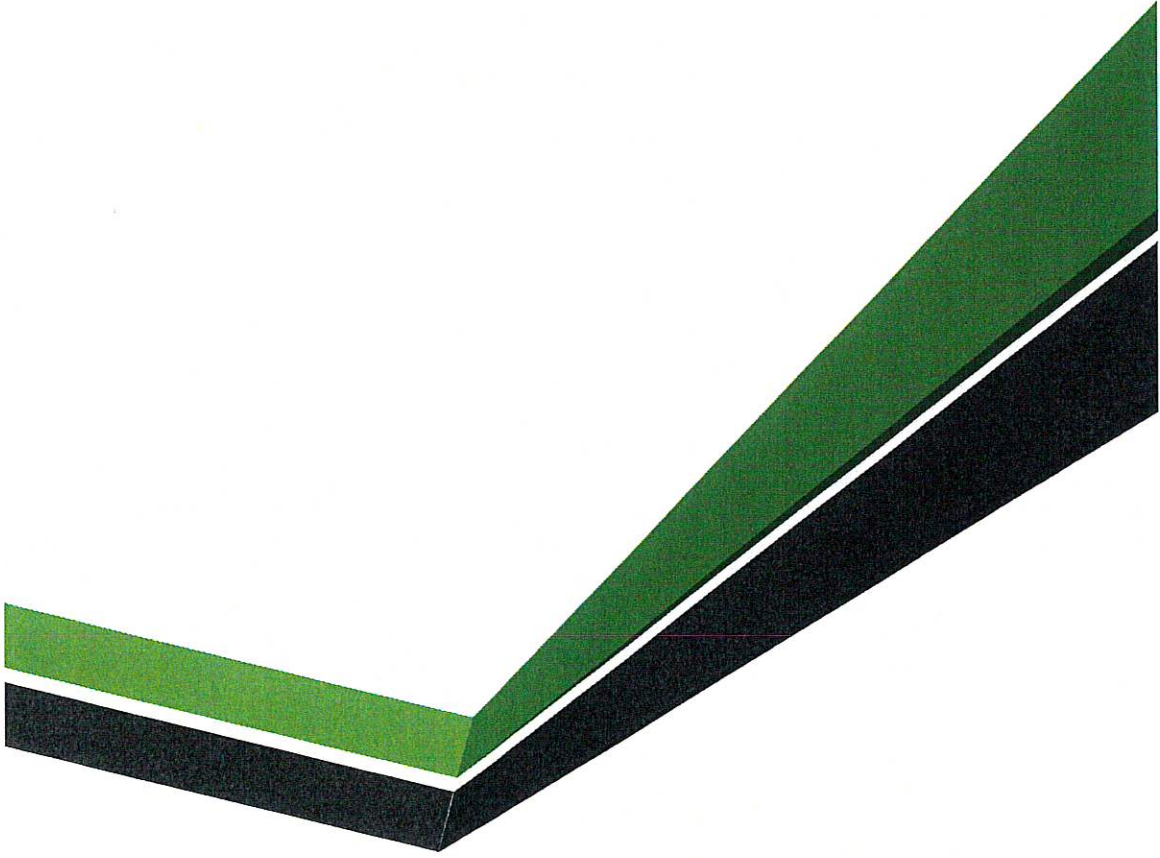
- ❏ Any amount of cannabis or cannabis product that may be sold, manufactured or transferred, must be placed into one or more packages, each package having a UID (package tag) created in Metrc.
- ❏ Any product that you intend to transfer from one licensee to another must have a UID which must be physically attached to the package.
- ❏ Metrc allows you to repack any package into a new package.



All associated plant or product data captured

**Complete package
status & history**

Manufacturing

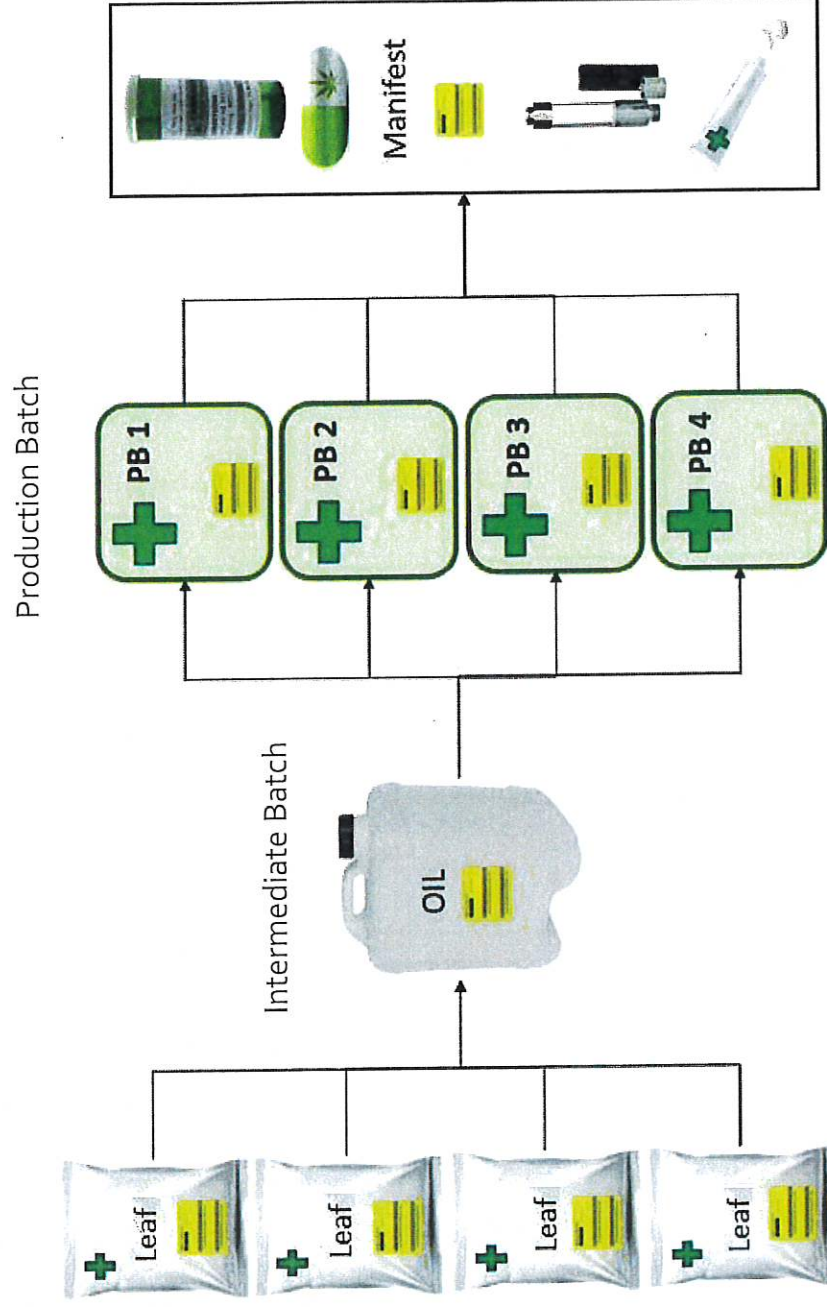


Packages, Intermediate Batches and Production Batches

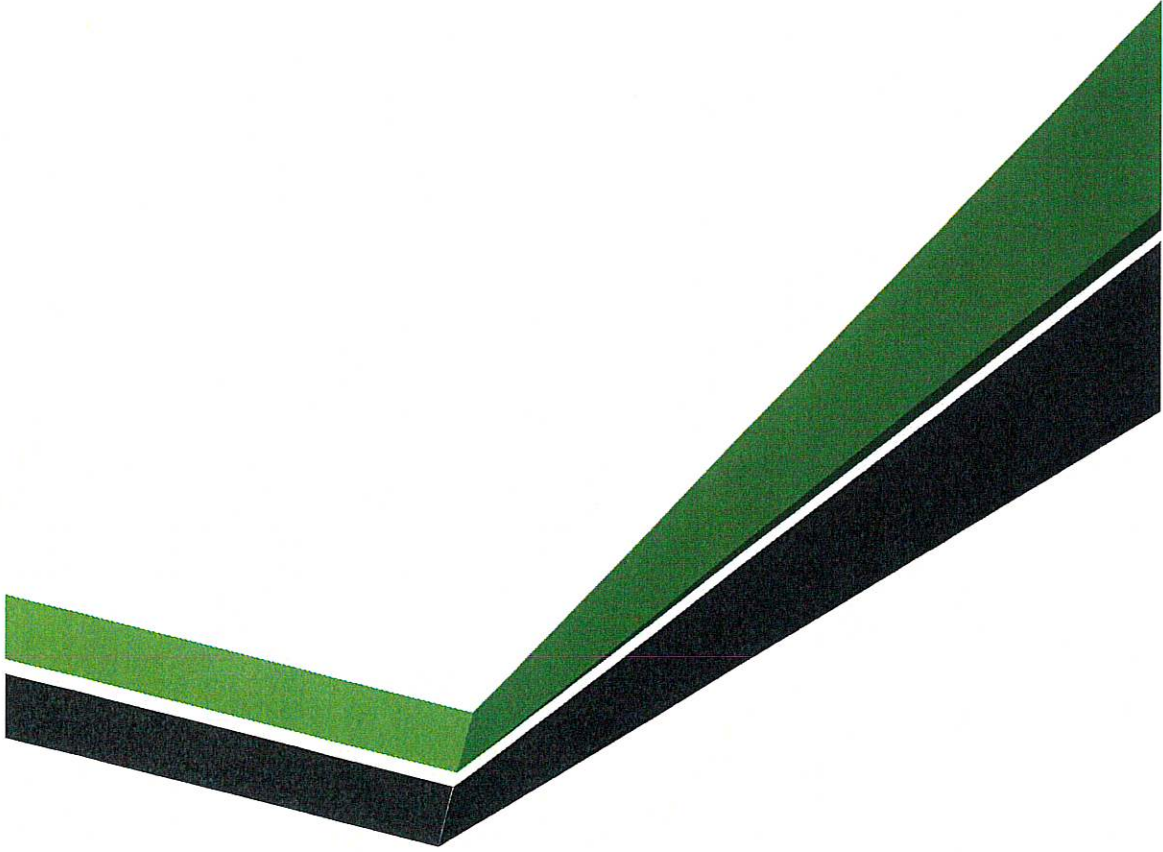
- Incoming packages can be used in an intermediate batch such as making concentrate.
- Pull from existing packages to make an intermediate batch of concentrate.
- Create a new package for the concentrate.
- The newly packaged concentrate may then be partially used in a production batch to make an infused product such as an Infused Edible or Infused Non-Edible or another Concentrate.



Manufactured Product Process



Transfers



[illegible]

Transfer
manifest
created, and
monitored by
the system

**Licensed
Transporter and
estimated and
actual departure
and arrival times**

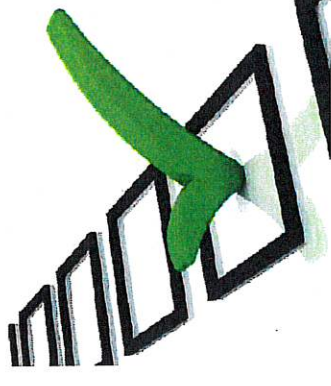
Manifest package details

Manifest pack details

Introduction to California Cannabis Track-and-Trace System v1.2

Notes to Remember about Transfers

- A package must exist in order for it to be selected for transfer. Transfers are real-time inventory-dependent.
- If you receive a package that doesn't match the weight, volume or count on the manifest (but varies only slightly) you must adjust the package in your inventory to report the actual, adjusted weight, volume or count.
- If you have any question at all about the transfer; then you need to reject it.



Transfer Procedures – Annual vs. Temporary Licenses



Transfers Involving Temporary Licensees

- After completing required training, an approved Annual licensee will be credentialed into Metrc and report supply chain activities (Metrc Enabled).
- Temporary licensees will not be provided access to Metrc to report supply chain activities (non-Metrc Enabled).
- Transfers between temporary and Annual licensees require some manual paper process.
 - The paper process is also required for transfers between two temporary licensees.



Manual Manifest Transfer Process

If the **originating** licensee is a Metrc enabled Annual licensee and the destination entity is a temporary licensee:

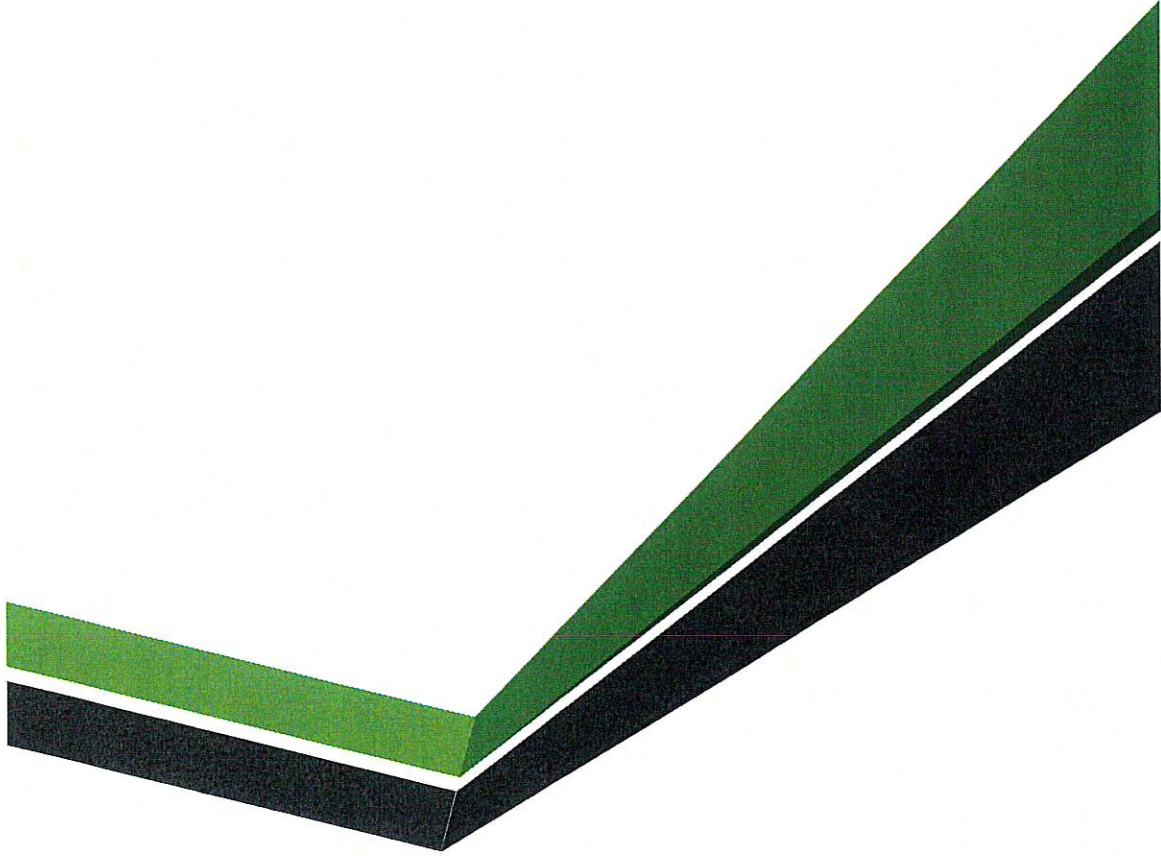
- ✦ The originating licensee creates an external manifest in Metrc by manually entering the temporary licensee information on the external transfer manifest.
- ✦ The Distributor keeps the manifest during transport, and documents the departure and arrival information.
- ✦ The destination licensee receives the transfer and follows the paper process prescribed by the Licensing Authority.

Manual Manifest Transfer Process






If the **destination** licensee is a Metrc enabled annual licensee and the sending entity is a temporary licensee:

- The originating temporary licensee creates a paper transfer document (per the paper process prescribed by the Licensing Authority) that contains the required package details.
- The Distributor keeps the paper transfer document during transport, and documents the departure and arrival information.
- The destination licensee enters the paper transfer document details and assigns a package tag UID from Metrc using the external transfer function.

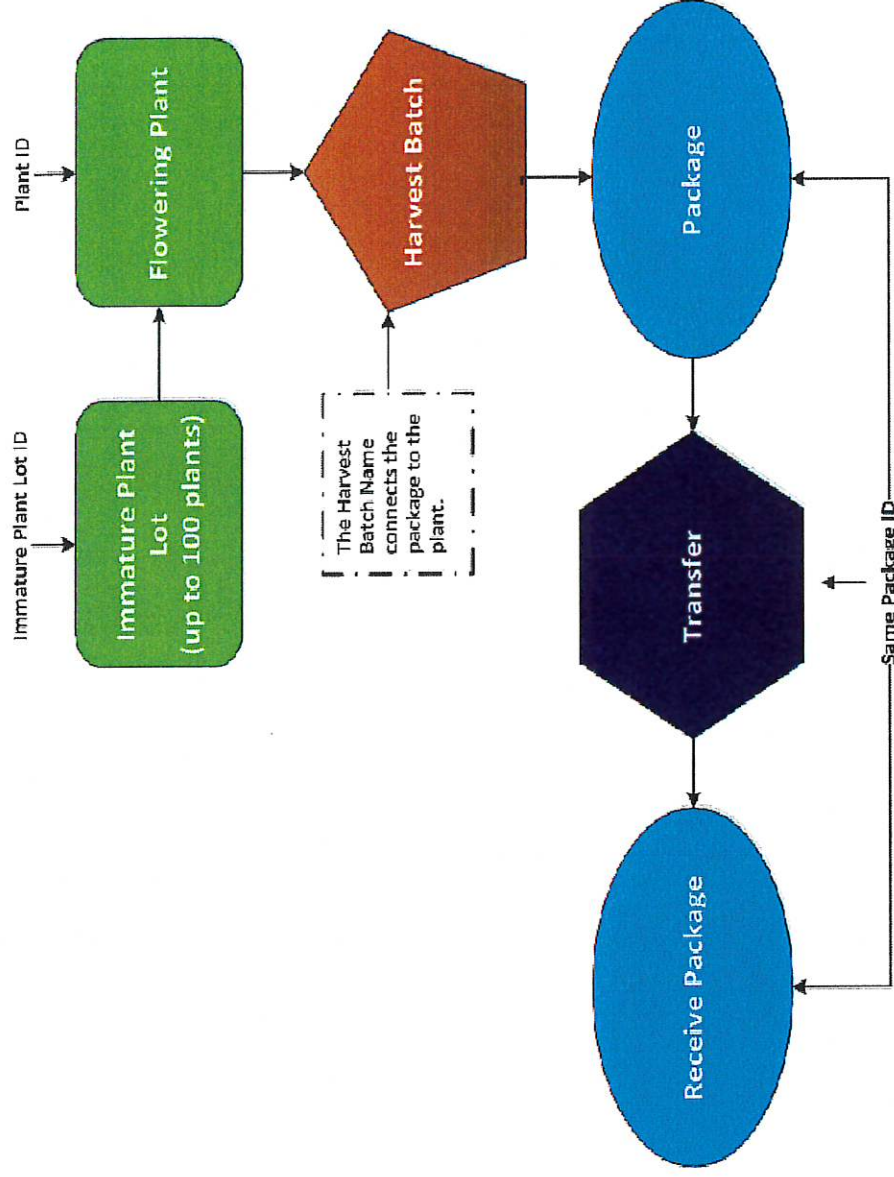
Distributors



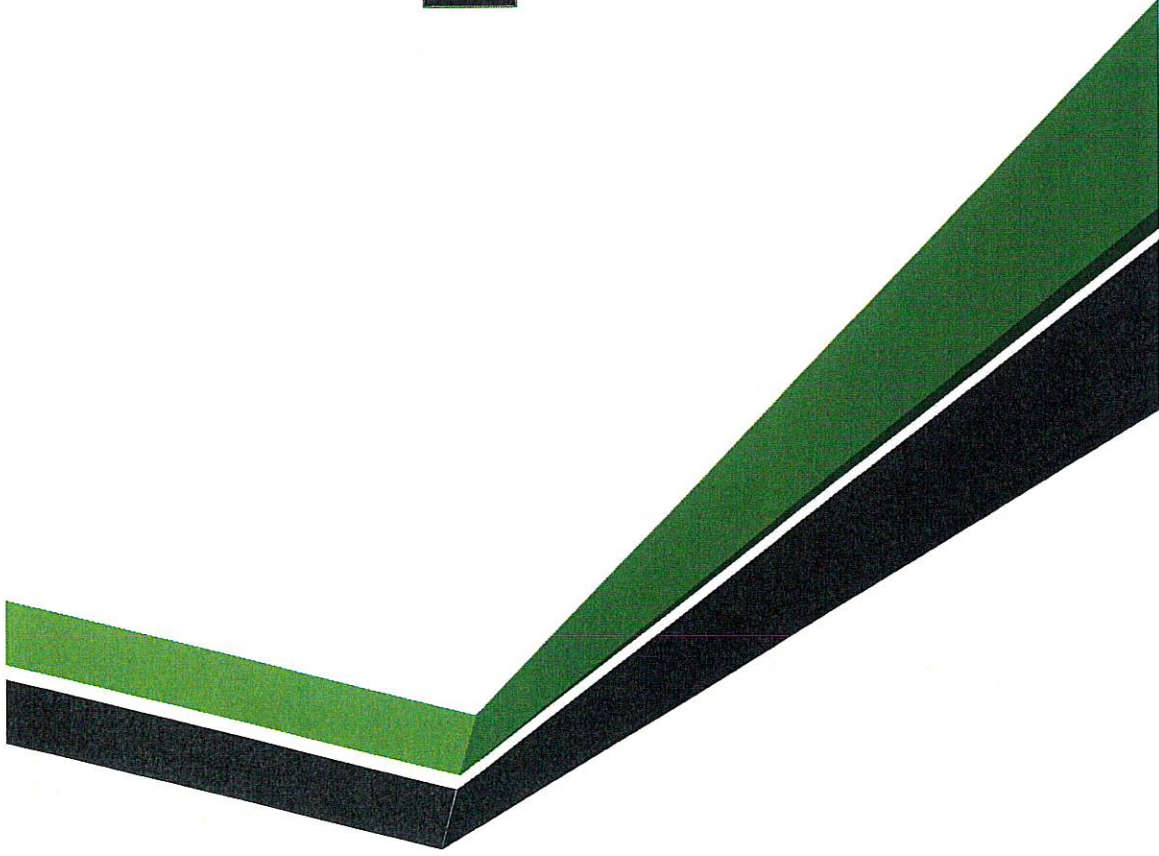
Distributors

-  Only Distributors can transport packages
-  Testing Laboratories can transport packages of samples
-  Important role in maintaining Chain of Custody during transport
-  Responsible for submitting samples of final product for testing prior to transferring to Retailer
-  Distributors are required record actual departure and arrival times at destinations and layover stops in Metrc

Chain of Custody

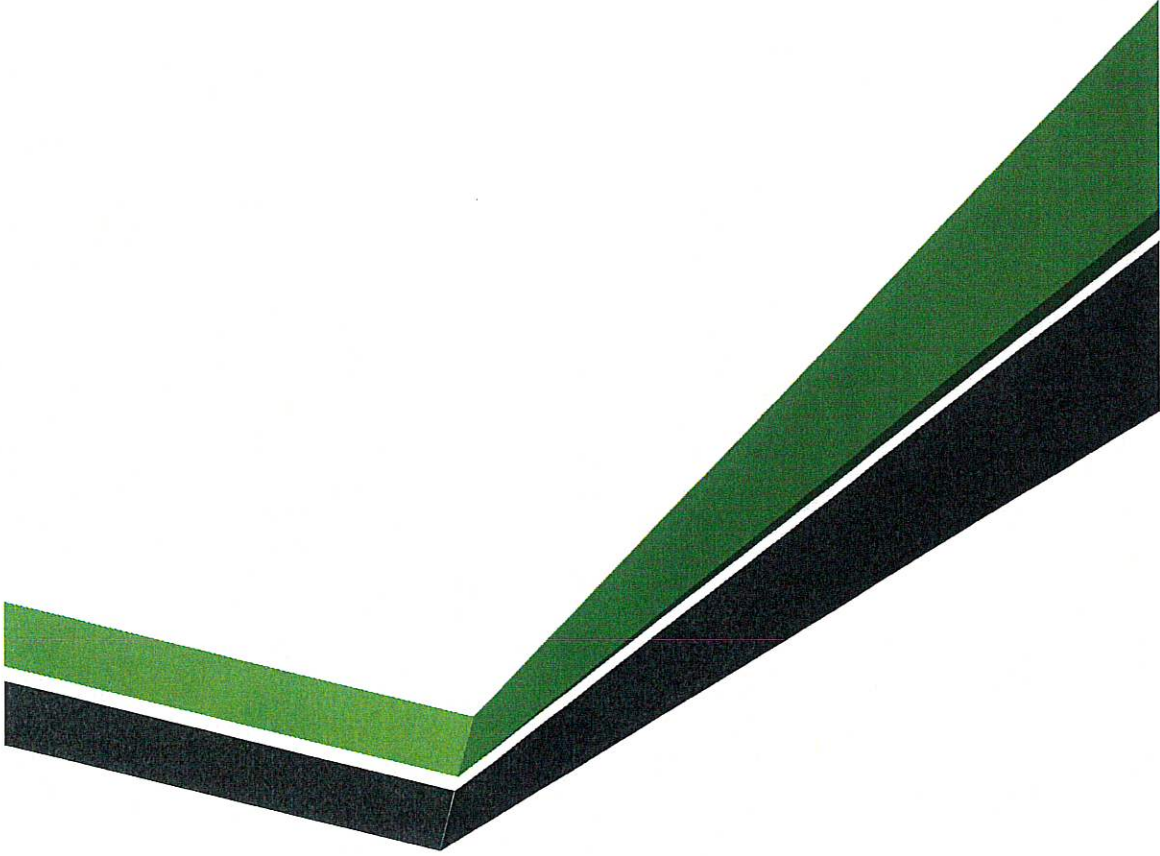


Laboratory Testing



Record Tests
Cancel

Retail Sales



Sales

Recording of Sales in Metrc is “reporting last event in chain of custody” and are entered **by transaction** per California requirements

☞ Total quantity

☞ Unit of Measure

☞ Date and time

☞ Total dollars of the sale

☞ Transactions must be entered within 24 hours

☞ There is sales data import functionality currently with POS companies

☞ CSV File upload



Sales Reporting

Sales Receipts

Record Receipts

Edit Receipts

Import

Daily Sales (read-only)

Receipt

Sales

Customer Type

Patient

Record Receipts

Sales Receipt # 1

Sale

10/30/2017

today

Date/Time

02

:

46

PM

Customer

☐ Consumer

☐ Patient

(clear)

Package # 1

ABCDEF012345670000025183

(clear)

Quantity

ex. 100.23

- Select -

Total Price

\$

ex. 100.23

Available

6.9251 oz

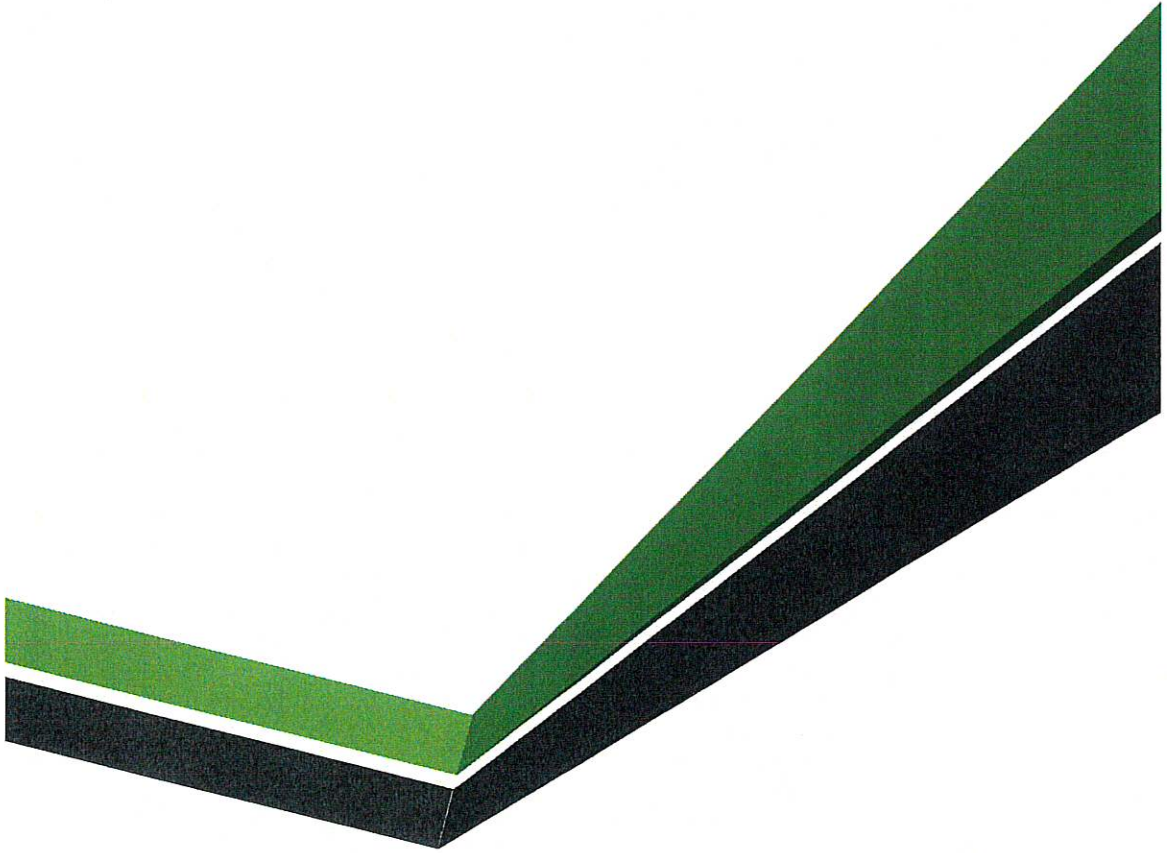
(package)

+

Record Sales Receipts

Cancel

Reports

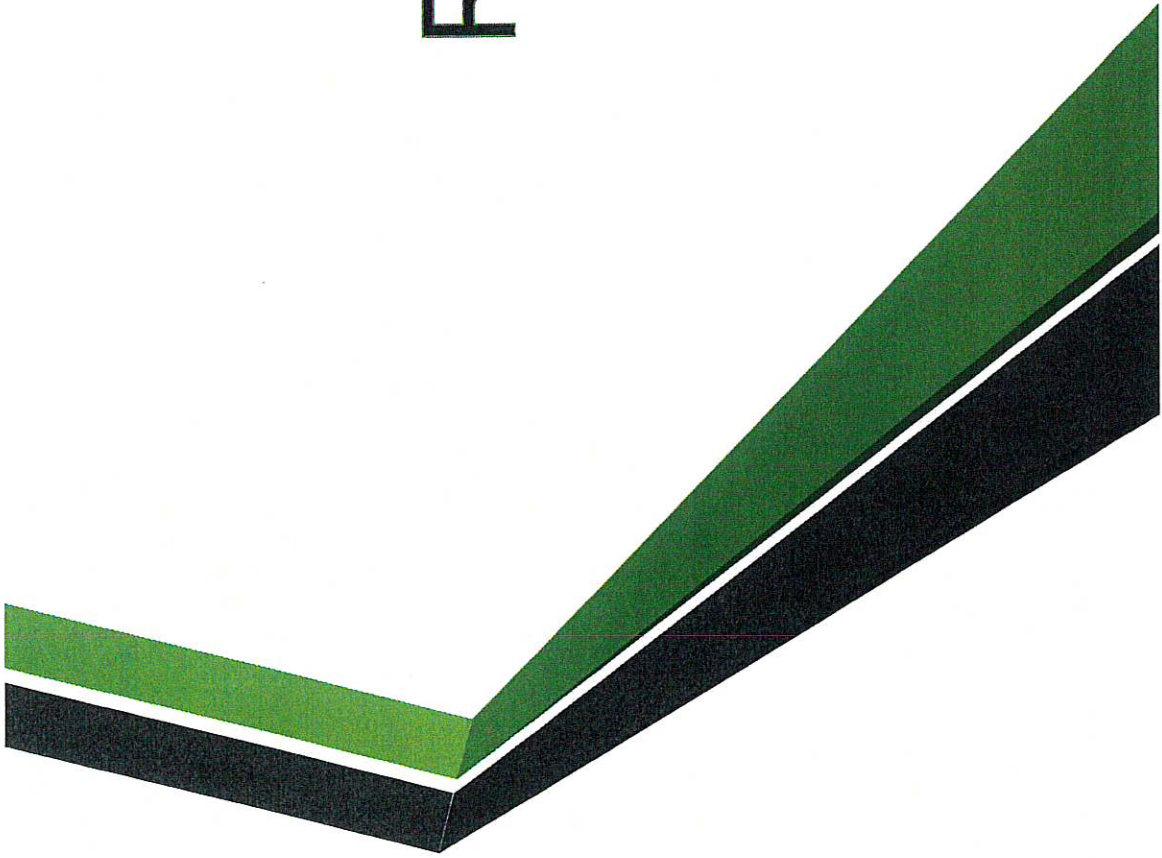


Reports

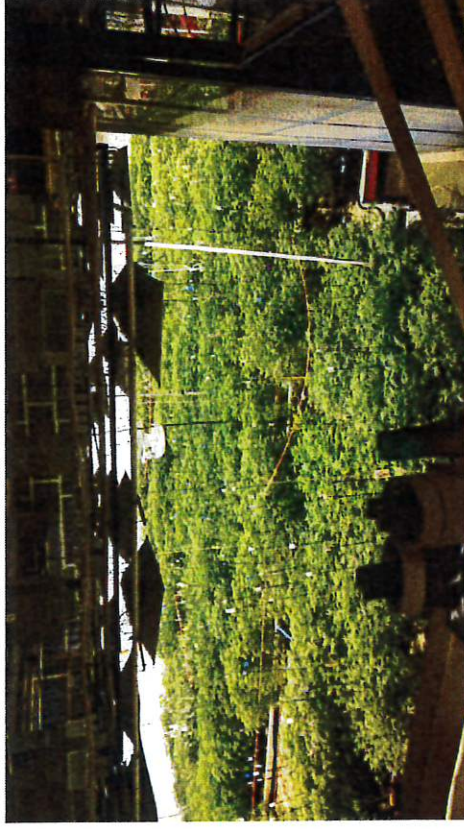


- Sales
- Cultivation
- Transfer
- Package
- Reports configured with trend analysis
- Exportable to MS Word, MS Excel, CSV and PDF formats

RFID, What & Why

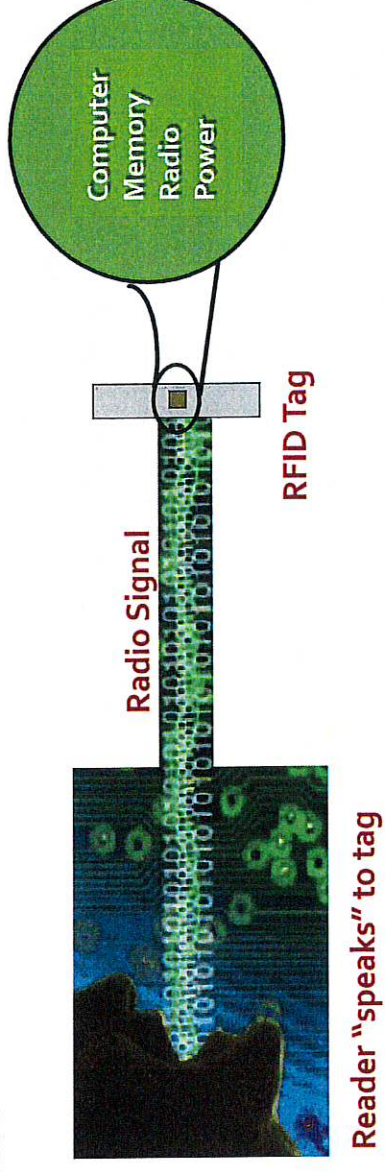


Speed / Accuracy / Precision

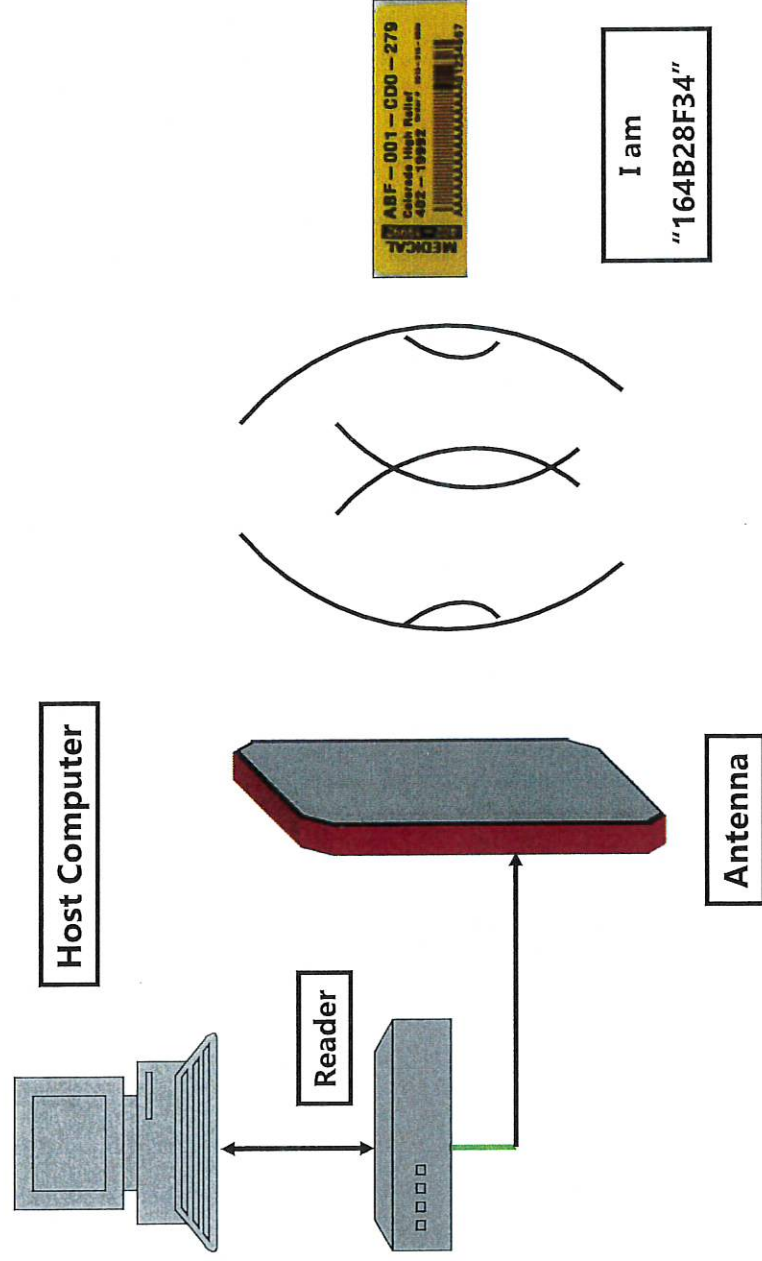


What is RFID?

- Radio Frequency Identification
 - A technology that identifies objects using low-power radio frequency technology.
- RFID Solutions consist of three components:
 - Hardware (Reader and Antenna)
 - RFID Tag
 - Software

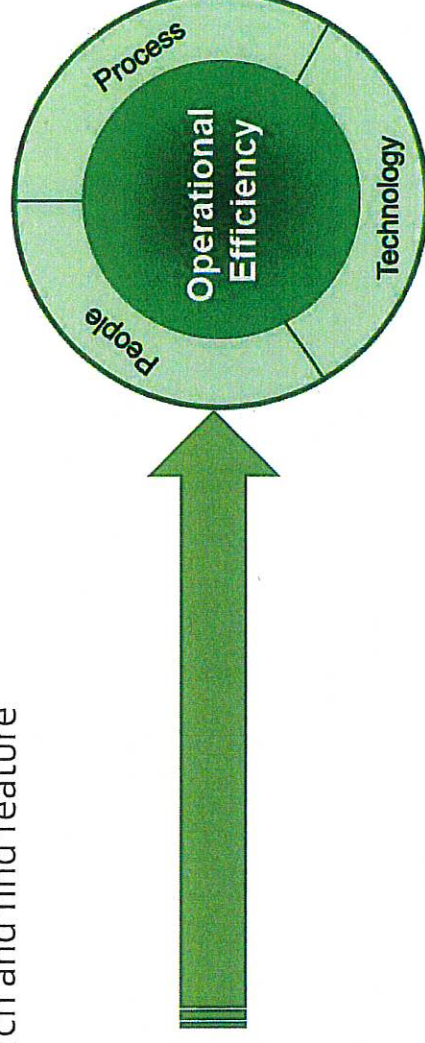


How Passive RFID Works

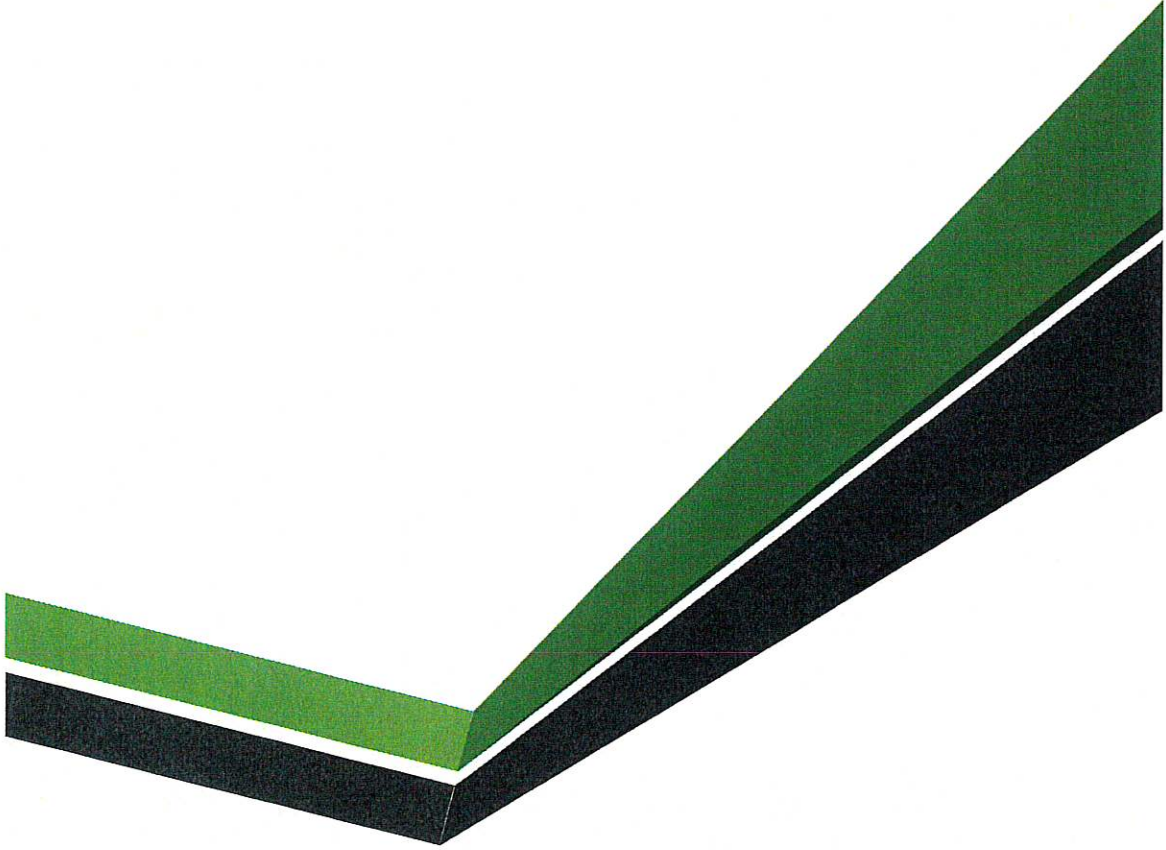


Why RFID?

- Read Range – 10+ Feet
- No line of sight
- Speed 8 to 10 times faster than bar-code
 - Improved Accuracy
 - Faster compliance
 - Search and find feature

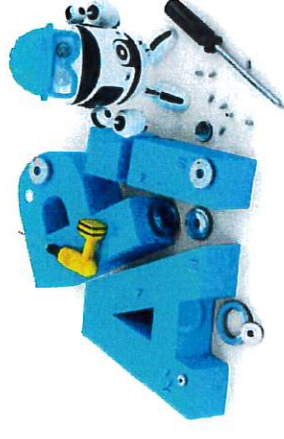


Integration

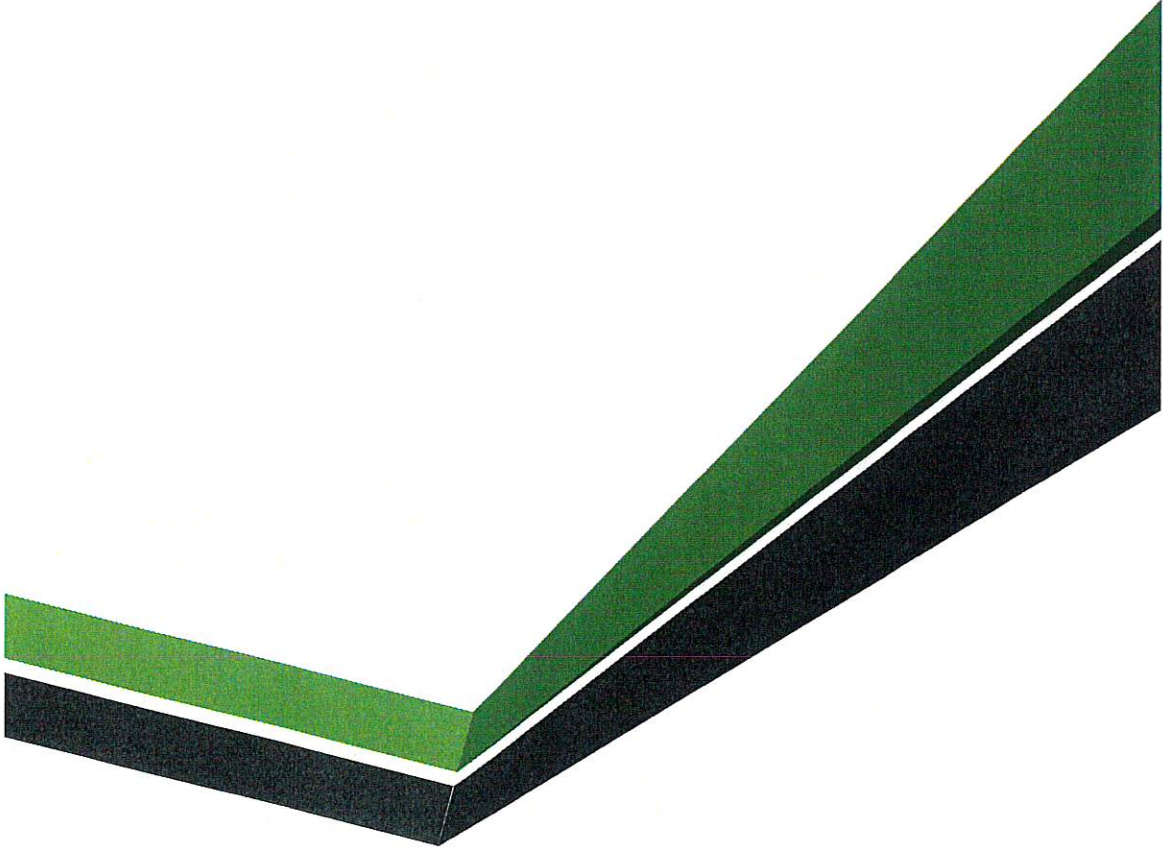


Application Programming Interface

- The API supports data transfer FROM third party vendor (TPV) applications to METRC
- Not all aspects of Metrc are available in the API
- The API supports data transfer TO TPV from METRC
- CA POS / API Integration training will begin on January 24th.



Support



Support Resources

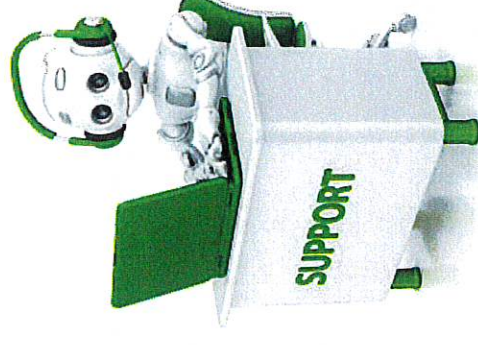
California Licensing Authorities

- California Department of Food and Agriculture (CDFA): cannabis.cdfa.ca.gov
 - Cultivator licenses
- Bureau of Cannabis Control (BCC): www.bcc.ca.gov
 - Distributor, Retailer, Testing Laboratory and Microbusiness licenses
- California Department of Public Health (CDPH): www.cdph.ca.gov/mcsb
 - Manufacturing licenses

Support Tab

- Metrc Manual/User Guide
- State Supplemental Guide
- Training
- **Interactive Support**
 - E-mail
 - Support@metrc.com
 - Metrc support line - 877-566-6506

YouTube





Contact Information

Support Desk

877-566-6506

Support@metrc.com

www.metrc.com/california

NURSERY & CULTIVATION SECURITY PLAN

Quail Creek Farms, Inc. 26900 Encinal Road Salinas, CA 93908

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SECURITY PLAN

This is the written Security Plan for; **Quail Creek Farms, Inc. 26900 Encinal Road Salinas, CA 93908** this plan addresses and meets the application requirements for the County Marijuana Program Rules and Regulations for County of Monterey.

INTRODUCTION

We understand that security is of paramount importance. We are keenly aware of the added security challenges that a business of this nature faces, and we have taken extensive measures to have professionally-vetted policies, procedures, and systems in place to provide comprehensive protection, for our employees and patients. We will also secure the physical plants and inventory. Our security will meet or exceed the County's requirements set forth.

We have named Divinity Protection Services as the Security Company in charge of security.



Divinity Protection Services INC. (DPS), formed in 2015, provides high level security services, consulting and training to companies, government agencies, organizations and private individuals.

DPS provides clients with custom, tailored security solutions that are progressive and in line with emergent threats, social trends and irregular "acts of the unknown." With business continuity, safeguarding personnel, and assets in consideration we have assembled a unique team of experts to address all security concerns-- physically, and or with "smart" technology solutions.

DPS only provides high caliber security professionals. Our founders and core management team are former military Special Forces, federal agents and law enforcement. Our agents have conducted protective operations in all 50 states and combat operations in over 110 countries and six continents during their careers. Our agents are trained in martial arts, tactical driving, crisis management, small weapons use, and first aid. We maintain a domestic and global network for our clients travel protection needs.

DPS services include estate security, corporate protection, hostile employment termination, high value property protection, precious cargo movement, threat assessment and personal protection for domestic and international travel.

DPS provides trained armed agents to protect grow operations with on-site monitoring 24/7. Our agents understand the cannabis business and are trained to maintain the confidentiality of all our clients.

The Lead Security Agent will have oversight responsibility for the implementation of this plan. As the person responsible for implementation, he also will serve as a liaison with the executive staff and board. In addition, he will have oversight responsibility to review and update the plan on a regular basis (at intervals not to exceed one year) to ensure our continued compliance to all laws and regulations.

With the leadership of our Lead Security Agent, we are developing a state-of-the-art plan that takes advantage of the security industry's best practices and most up-to-date technology, ensuring that our cultivation and nursery facility operates at the highest level of security preparedness.

Our Security Plan is divided into two components: *Facility Security* and *Operations Security*. The preventive measures adopted in these components will minimize our security exposure, protecting the public, our patients, and our staff. We also are confident that should there be any breach of security, our comprehensive response capabilities will ensure the incident is quickly detected, contained, and resolved at the appropriate response level.

FACILITY SECURITY

The security at our facility will be designed to reduce the likelihood of security breaches and trigger an immediate response in the event of a breach. In addition, it will be designed to control access to the manufacturing and cultivation areas, limiting access to authorized and properly identified personnel.

A. Physical Structures

Location and Structure Specifications

The physical address of our facility will be: **Quail Creek Farms, Inc. 26900 Encinal Road Salinas, CA 93908**

our proposed facility is located within the **Farmland** zone that includes **nursery** businesses.

There will be **One (1) Nursery** structure, **see attached map** labeled **(D-nursery)** 43,200 sq.ft. and **Four (4)-Cultivation** greenhouse structures. 1-**(E-greenhouse)** 43,200 sq.ft. 2-**(F-greenhouse)** 43,200 sq.ft. 3-**(G-greenhouse)** 43,200 sq.ft. 4-**(H-greenhouse)** 47,396 sq.ft. and One (1) Processing building 1-(processing) 9,000 sq.ft. It is approximately **40** feet from the nearest public road, has secure means of ingress and egress, is in an area of

low vehicular traffic, is in an area with little or no non-commercial traffic, and is over 5,000 feet from the nearest school.

Floor Plan

A floor plan of the facility detailing the location of (1) All entrances and exits to the cultivation center; (2) The location of any windows, skylights, and roof hatches; (3) The location of all cameras, and their field of view; (4) The location of all alarm inputs (door contacts, motion detectors, duress/holdup devices) and alarm sirens; (5) The location of the digital video recorder and alarm control panel; and (6) Restricted and public areas is shown in our proposed floor plans included in our application packet

Lighting

Security lighting is one of the most practical and effective ways to help prevent crime in or around commercial facilities.

The main objectives of our security lighting at the cultivation site is to illuminate dark areas and detect and recognize movement in the protected area. The best vision with outdoor lighting is obtained from downward directed and shielded security lighting that is constantly on, supplemented with instant-on lighting triggered by motion detectors to add an even brighter light.

We will add external security lighting to perimeter fence, including high spot lights to both facilities. Each facility and all walkways of each facility will be well illuminated to maximize visibility. Lighting will be operated automatically by a photo-sensor, ensuring that lighting will at all times be optimal for video capture.

Security Agents/ guards

Once the facility is operational we will employ Divinity Protection Services to provide security agents. Plain clothed or uniformed security personnel will be on site monitoring the facility during hours of operation to observe & report and respond to security issues. All security personnel will be thoroughly screened, trained, and strictly supervised by our Security Department working in conjunction with Divinity Protection Services, to ensure they are of the highest capability. Our internal liaison for our Security Department will be, Shea Ackerly and DPS management.

During operating hours, we will have at least one or more on-site security agent at the entrance/exit to monitor all traffic in and out of our property. After hours we will have at least one or more on-site security agents on property. Agents will work 12 hour shifts from 6am to 6pm and 6pm to 6am.

Security personnel will perform and keep records of having performed routine regular inspections of all security systems, barriers, gates, doors, and locks, immediately reporting any malfunctioning or compromised security feature to the client's designated supervisor and security management. Any incidents qualifying as irregular or suspicious will be handled immediately.

Perimeter Security

We will secure the perimeter of our property to prevent unauthorized intrusion. With our entire facility, we plan to use one or more of the following critical elements to secure the perimeter of our building: security fencing, security guards, and electronic surveillance (round-the-clock manned or alarmed camera surveillance and electronic intrusion detection).

The entire **Quail Creek Farms, Inc. 26900 Encinal Road Salinas, CA 93908** facilities will have a 6' fence with green fence weave and barbwire at the top. The barbwire is connected by posts which are pointed away from the property. The security of the perimeter fencing will be checked by agents/ guards daily.

The perimeter of each structure will be secured by video surveillance and adequate outside security lighting. During non-operational hours, all entryways and exits will be closed by our gates to prevent access; in addition we will have on-site security 24 hours per day.

Sentry Alarm motion detectors will monitor the inside of all exterior doors and windows. These are separate sensors from our video camera motion detectors.

Access Conditions for Staff and Non-Staff Business Associates

At the facility, all staff and business associates will park in the designated common parking area of the property (after being cleared by security at the entrance). All staff will need ID cards to access all structures, including restricted areas within the facility.

Staff here refers to the following: a principal officer, board member, employee, or volunteer. Non-staff business associates are all those, such as vendors and contractors, who do business with our Company but are not our staff. To access restricted areas of any part of the facility, non-staff business associates will need to be admitted by security and must be accompanied by a staff member at all times.

All persons working for or doing business with us will need a company-issued permanent identification card or temporary identification tag to be able to enter restricted areas. Staff will receive these upon hire.

Once the reason for their visit is confirmed, vendors and contractors will receive temporary identification tags at the entry gate before being allowed to enter the property under staff escort.

We will require that ID cards and tags be visibly worn by all staff and non-staff at all times within the facility.

All staff and vendors will be cleared by security at the main security check point before entering secured property area. No cars will be allowed past security check point. Staff and vendors will park in a consolidated parking area before entering the check point.

B. Electronic Security System

We will install a comprehensive electronic security system with video surveillance/recording capability, third-party monitoring, intrusion detection, and panic buttons.

Video Surveillance

Through the help of Sentry Alarm we will employ state-of-the art external and internal cameras, each with a minimum resolution capability of 704 x 480 pixels per sq. inch. This is sufficient to allow facial identification of anyone in or nearing the facility. All cameras are equipped with motion detection and will have infrared technology for low light conditions, capable of identifying activity at night or in unlit rooms. Our CCTV camera system with digital recorder includes:

- Honeywell Performance Series HQA DVRs (16ch / 3+TB, each)
- Honeywell HD73HD2 vandal resistant color mini-dome cameras throughout

External video surveillance will cover all areas of possible ingress and egress. Internal video surveillance, cultivation rooms, and processing rooms. This covers all areas where marijuana is present or handled, including all point-of-sale locations, and all means of access to such areas. Video surveillance will cover external and internal areas 24/7.

Electrical backup will be provided by a Uninterrupted Power Supply unit sufficient to supply a minimum of five minutes of backup power to our cameras and computers. We have both on and off-site storage capability of 3TB, enabling us to store at least 60 days of video surveillance recording. A failure notification system will provide both audible and visible notifications if there is any failure in the electronic monitoring system.

See Addendum for specifications of the camera and recording technology and the location of cameras throughout our facility.

Third-Party Monitoring

We anticipate contracting with Sentry Alarm to help deter, detect, and document security events at each facility from a remote location. Sentry Alarm will monitor for fire and for security breach of doors or windows. Trained professionals from their monitoring centers will be able to access our security surveillance system at all times, and will report and document any suspicious activity. Our internal security personnel will work with Divinity Protection Services and Sentry Alarm to establish guidelines for what entails suspicious activity and to ensure regulatory compliance.

There will be triggers around the facility to alert our monitoring team of a possible intrusion or unauthorized access. Triggers can be:

- Motion activated surveillance cameras
- Infrared intrusion sensors
- Unauthorized electronic access via supervision of system arming/disarming via individual personnel keypad combinations
- Security and fire alarm systems with remote station central station supervision

Sentry Alarm Systems has been propelled into the "Top 100 Security Companies" due to our reputation of service the national chains can't touch and prices the locals can't beat. We plan to continue our phenomenal growth by building on our foundation of integrity, competence and family values.

For four decades Sentry has provided reliable system installation, service and 24-hour UL central station monitoring providing our commercial, industrial and residential Customers 24-hour peace of mind.

The corporate headquarters and the central monitoring station are located locally in the Ryan Ranch Business Park in close proximity to the Griffin Holistic facility – allowing for prompt response to security growth and service requirements.

Intrusion and Motion Detection

Our alarm system will have motion detectors covering entryways and exits, hallways, cultivation rooms, storage rooms, and windows. Rooms in which perimeter windows are located will be equipped with audio glass break detection.

All active perimeter personnel and overhead doors will be equipped with magnetic door contacts to detect the opening of a door when the system is armed. The Vault door will also be contacted to detect opening when the system is armed.

Sentry Alarm motion detectors will be utilized to monitor the interior side of all exterior windows and doors. (These are separate from our motion-activated video recording)

Burglary Alarm System

We shall install, maintain, and use a professionally monitored robbery and burglary alarm system; which meet the following requirements:

- The control panel shall be a Vista-128BPT UL listed burglar alarm control panel;
- The system shall report to a UL listed central monitoring station at the Sentry Corporate Headquarters in Ryan Ranch, Monterey, CA. Signal transmission will be via dedicated telephone line with cellular/high security GSM back-up
- A test signal shall be transmitted to the central station at a maximum of every twenty-four (24) hours
- At a minimum, the system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls, roof hatches, skylights, and storage room(s) that contain safe(s)
- The system shall be inspected and all devices tested annually by Sentry Alarm Systems.

Alarm Testing

A test signal will be transmitted to the central station every twenty-four (24) hours. The alarm system will provide coverage of the facility ingress/egress points, the exterior windows, offices, production areas, storage areas, cashiering areas and the product safe. The system will include at least one (2) holdup alarm for staff use. Finally, the system shall be inspected and all devices tested annually.

Fire Security

Both operations will comply with all national and local fire Code requirements. The fire system design will be reviewed for approval by the Fire Department for permit issue.

Requirements of the Fire Department above the proposed design will be reflected on a Change Order.

We will use Carlon's Fire Extinguisher Sales & Service, to provide sprinkler systems for the cultivation facility. Alarm initiating and supervisory switches will be connected to the fire alarm system.

Design is predicated on the "F" occupancy indicated on the plans. Notification appliances will be installed throughout the building. A single manual pull station will be installed in a continuously occupied area of the building for access during business hours.

The fire alarm equipment will be an addressable Firelite alarm control/communicator. Communication to the central monitoring station will be via dedicated land line with high security cellular/GSM back-up communication.

In addition, all rooms will be equipped with smoke detectors. ABC rated fire extinguishers will be present in the cultivation rooms and dispensary.

Maintenance and Testing

All security-related systems will be routinely inspected to insure that they are functioning properly. This includes:

- Video surveillance equipment
- Third-party monitoring equipment and connections
- Alarm systems
- Sensors
- Electrical connections
- Motion detectors
- Smoke detectors
- Panic buttons
- Phone connections
- Information storage and backup systems
- Electrical backup systems

The Security Agent will be responsible for ensuring that such inspections take place at reasonable intervals. We will promptly implement all necessary repairs to ensure continuous proper functioning of the security system. Inspection results and maintenance records will be securely kept for review by the County and appropriate oversight authorities.

We will be utilizing a solar panel system along with battery backup to insure that in the event of a power outage our facility will still have the appropriate power needed to keep the building secure. This means our electronic access will remain along with our other systems that we will have in place.

C. Policies and Procedures for Facility Security

Incident Management and Emergency Response

We understand that smooth operations require well-laid contingency plans and a staff well-trained in their execution. Under the leadership of our Security Agent and with input from appropriate local agencies and enforcement authorities, we will develop a comprehensive Emergency Response Plan.

The Emergency Response Plan will include contingencies for non-security related emergencies such as medical emergencies, bomb threats, fires, explosions, chemical release, and weather-related disasters to ensure an appropriate and orderly response. This will prevent non-security related emergencies from becoming aggravated security emergencies as well. Emergency procedures and emergency contact numbers will be provided in writing to all employees and posted prominently in all areas of the facility.

We will also develop a comprehensive set of guidelines for dealing with security threats. All staff will learn and be drilled in these procedures to ensure they are adequately prepared for emergencies. Preparedness means all staff members:

- Know how to assess emerging situations to determine the type and level of threat they may pose;
- Know how to respond to different kinds of security threats;
- Know which types of situations warrant the activation of panic buttons; and
- Know how to proceed when a security alarm goes off or a panic buttons has been activated.

If a security breach is found to constitute an actual emergency, authorities will be notified as required. We will then follow the emergency response procedures it will establish in cooperation with local law enforcement authorities for smoothly bringing the situation under their control.

Procedures will be revised and updated as necessary. They will be reviewed at least once every twelve months. We will invite local law enforcement to offer their input on up-to-date security threat analysis and contingency planning.

Outside Partnerships: Liaising with Community and Local Law Enforcement.

Local law enforcement and neighbors in close proximity to our facilities will have the name of one or more contact persons on our staff that they can notify day or night in case there is a problem impacting them or that they feel may impact us.

We will periodically reach out to neighbors to ensure that there are no unreported problems of this sort.

We also will reach out to local law enforcement to develop a professional working relationship and a coherent contingency plan for incidents that require a law enforcement involvement at our facility. Local law enforcement officials will be invited on-site to discuss and evaluate potential security risks, vulnerabilities, and to assist in the development or enhancement of our current security program.

Closing Procedures

After the cessation of business each day our closing procedures require that the alarms be set by the two (2) or more individuals who will all exit at the same time. At the close of each business day, our personnel will insure that all rooms are locked, the processed medical marijuana and medical marijuana to be disposed of is under lock and key in the safe and that the security alarms are set. For the cultivation procedure, we will follow the same procedures in place with the addition of the final employee leaving the building with the security agent/ guard as the witness.

Preventing Theft & Non-Diversion

To prevent diversion of marijuana we will take the following measures:

- Any personnel that commit theft or diversion will result in their immediate termination and the incident will be reported to the Police.
- All marijuana being cultivated will be maintained in a secure and locked room that is accessible only to authorized staff.
- Marijuana that has been processed but not delivered to an authorized dispensary will be in stored a compliant safe.

- Only authorized individuals will be allowed on the cultivation facility and/or nursery premises thereby reducing the threat of theft or diversion of marijuana.
- Implementing our state-of-the-art supply chain tracking system that follows every plant from seedling to sale to prevent shrinkage within the cultivation facility. Each plant has a barcode and if it is missing we will know that a serial number is unaccounted for;
- Compare average yields of plants, whereby if plants in particular areas are yielding less end product we can alert Security to a possible concern; and

Since regular inventory and supply chain tracking is crucial to preventing diversion, inventory will be manually performed every day by two background-checked employees to verify the accuracy of our computerized inventory management system using BioTrackTHC.

We believe that by having strict guidelines aimed at preventing diversion, and creating an inventory tracking system that allows us to follow each plant from seedling to sale, we will be able to create a closed loop system and effectively mitigate risks of theft and diversion.

Preventing On-Site Consumption

We shall not permit the consumption of marijuana at the registered premises in any form. Any marijuana or marijuana paraphernalia that shows evidence of the medical marijuana having been consumed or partially consumed will be reported to the County and/or local Police Department.

Incident Log

We will maintain an incident log with reports of incidents that triggered an alarm. Such reports shall be made available to the County during any inspection of the facility. We will notify the County by electronic means within twenty-four (24) hours of any incident in which a theft, burglary, robbery, or break in occurred, whether or not items were actually removed from the facility. Our facility manager shall follow up the initial notice with a written report describing in detail the factual circumstances surrounding the incident and include an inventory of all stolen items, if applicable. The incident log will be kept in a safe and secure filing cabinet as well as on Google Drive for a Digital Copy.

Suspicious Activity and Loitering

Staff will be trained to identify and respond appropriately to all levels of suspicious activity. Loitering will not be tolerated. Loitering by non-staff will result first in a warning from our staff or security agent/guard, and then in notification of local law enforcement.

OPERATIONS SECURITY

Making sure that our routine operations follow secure procedures is as important as physically securing each facility and having emergency response procedures in place. Consistent, proactive operational security policies and procedures greatly reduce the likelihood that emergencies will arise.

A. Workforce Security

Staffing Structure and Current Employee Roster

We expect to employ at least 40 people at the nursery/ cultivation facility. A breakdown of the positions by title and job description is found in the Staffing Plan. For any positions that have already been filled, we provide the names and biographies of the persons hired.

Background Checks

We will perform background checks on all employees, volunteers, principals, directors, and board members. We will also perform background checks on any contractors or vendors who regularly work within the facility or will be employed there for an extended time. Copies of any public records obtained through the background check process will be provided to the individual concerned. To ensure transparency, the entire background checking process will be conducted by a third-party.

We will not employ anyone who has been convicted of a felony. Also, we elect not to engage any contractors or vendors who would have access on a regular basis or for an extended time to restricted areas of our facility if they have been convicted of any felony offenses.

Training and Drills

Security and emergency response training is only part of the comprehensive training required for all employees. Training will also cover:

- Medical/ marijuana laws and regulations,

- Patient privacy, confidentiality, and secure electronic record keeping,
- Personal safety, fire safety, and crime prevention.

Employees will be tested on training content and must pass the test by their third attempt in order to remain employed. All staff will also go through periodic refresher seminars, as well as new training on any policy updates or changes in procedure. All emergency procedures will be rehearsed in periodic drills.

In addition to training and periodic drills, all employees will receive official Company reference material, written in plain English (Spanish versions will also be available) and presented in an easy-to-use outline format, explaining all our operational, safety, and security policies and protocols.

In developing our official safety and security policies, we will consult with local law enforcement. We will also work with local police to develop effective ongoing employee training seminars and practices. Especially in developing our policies and training procedures on crime prevention and security threat response, we will seek the involvement of local law enforcement.

Personnel Records

We will maintain personnel records for each employee, agent, or volunteer that includes:

- Application,
- Documentation of all required training,
- A signed statement from the individual indicating the date, time, and place that he or she received training and the topics discussed, including the name and title of the presenters, and
- Record of any disciplinary action taken against employee at any time during employment.

These personnel records will be maintained for a period of at least six months past the end of the individual's affiliation with us.

Business Hours

Our nursery/ cultivation facility shall not be open to the public. The cultivation portion of the facility will operate twenty-four (24) hours a day. We shall permit only a registered

director, officer, member, incorporator, agent, manager, employee, or government or law enforcement official on the registered premises of our cultivation center.

Our nursery/ cultivation center hours of operations will be conducted by the permit type which is consistent with the essential hours in order to operate the facility and/ or which will be operated between regular business hours from 8am-8pm Monday-Sunday shall only operate within the hours as prescribed by the ordinance.

A. Inventory Security

Storage

All harvested medical marijuana will be stored in high-security fire-proof safes. Inventory will be removed from the storage safes only for the purpose of immediate transport. Our fireproof safes will be waterproof with all steel construction, inside and outside. Our storage safes will represent top quality for safety and fire protection. The storage area shall have a volumetric intrusion detection device(s) installed and connected to the facility intrusion detection system. The safe shall be a UL listed burglar-proof safe with a minimum rating of TL-30. Safes weighing less than seven hundred fifty pounds (750 lb.) shall be installed in a steel clad concrete block or otherwise securely anchored to a fixed part of the facility structure.

Visibility

Marijuana will not be visible from any public or other property not operated by us.

Disposal of Unused or Surplus Medical Marijuana

We intend to dispose of unused or surplus medical marijuana and its by-products by grinding and incorporating the marijuana waste with non-consumable, solid wastes such as paper, plastic, cardboard, food, grease or other compostable oil, and other waste approved by the State Licensing authority that will render the Medical Marijuana and Medical Marijuana Infused Product as unusable and unrecognizable as marijuana.

We shall report any stolen or lost medical marijuana by filing a police report by calling 911 or in person with the Police District where our registered business resides either in person or in writing within twenty-four (24) hours of becoming aware of the theft or loss.

General Trash

All trash will be kept in a locked portion of the facility and will be taken out by an employee on the day and time the local trash is picked up in order to prevent anyone from rummaging through it.

Record Keeping

We will keep meticulous records, complying with local, state, and federal laws and regulations regarding patient records, inventory records, and transportation records. Transport agents will carry with them a copy of the transport authorization and control data (the “transit slip”) during transport of medical marijuana. All inventory control records and records of inventory transfer, transport, and delivery will be kept for five years and made available to the County and authorities on request.

B. Information Systems Security

Securing Data

Our data and information are as valuable as our products. We will take both ordinary and extraordinary measures to protect our information systems and keep our data secure. Ordinary measures are:

- Using virus protection, spam-filtering, and firewalls
- Keeping software and OS updated
- Using passwords and changing them frequently
- Using secure wireless networks
- Restricting web browsing
- Initiating frequent and secure data backups

We will limit access to our network by using unique user passwords and by restricting IP addresses and MAC addresses to specific computers. The use of third party email, web, and data servers will be avoided. We will provide training on user security procedures.

- All data and information from our security system and from our inventory control system will be secured and encrypted and backed up automatically every night, not only to a private server on site, but also to a secure, off-site server location. Should there be an emergency, natural disaster, or criminal breach at our facility, all data remain safe and remotely accessible on our remote backup server.

SEE PERMIT FOR:
REEK FARM
26900 ENCINAL ROAD
SALINAS, CA 93908

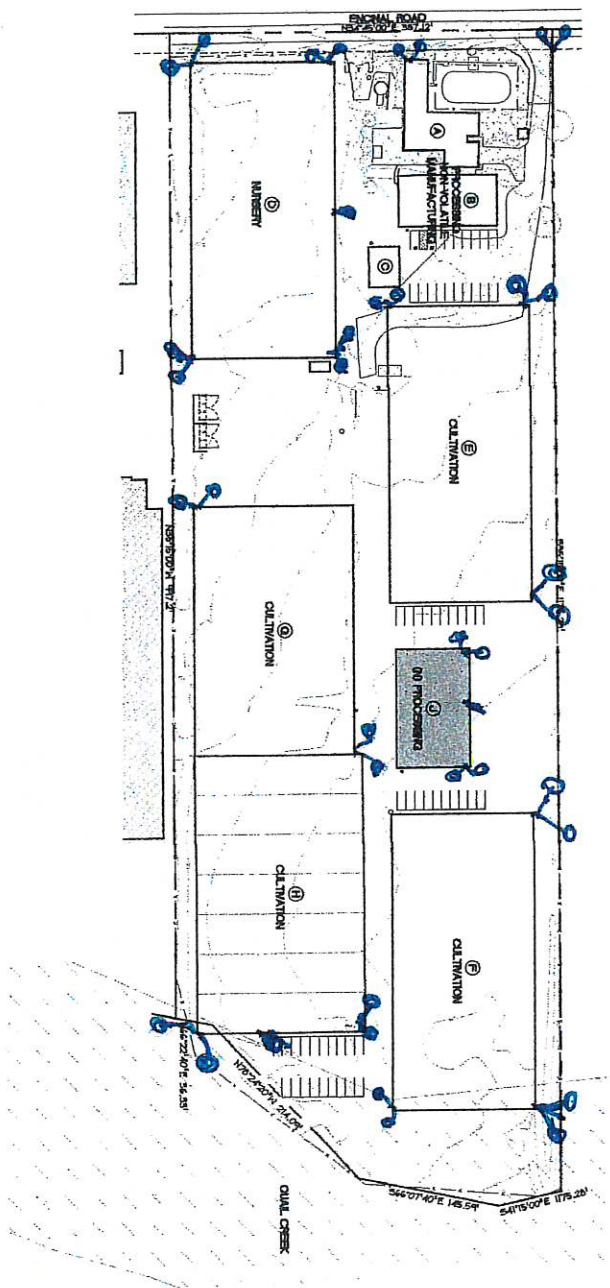
	EXISTING	REMOVED	NEW	TOTAL
ADMINISTRATIVE	11,427 S.F.	11,427 S.F.	-	-
GENERAL PURPOSE	57,000 S.F.	57,000 S.F.	-	-
GENERAL PURPOSE (1)	4,700 S.F.	2,641 S.F.	47,356 S.F.	47,356 S.F.
GENERAL PURPOSE (2)	-	-	45,200 S.F.	45,200 S.F.
GENERAL PURPOSE (3)	-	-	45,200 S.F.	45,200 S.F.
GENERAL PURPOSE (4)	-	-	45,200 S.F.	45,200 S.F.
GENERAL PURPOSE (5)	-	-	45,200 S.F.	45,200 S.F.
TOTALS	20,827 S.F.	-	177,956 S.F.	177,956 S.F.

CREATOR:
DAVE CREEK, PANTS, INC.
CONTACT: JEFF DONNELLY
PHONE: (841) 461-1281

ARCHITECT:
BELL ARCHITECTURAL GROUP
CONTACT: LINDA BELL
PHONE: (804) 424-4600
FAX: (804) 424-4600

CALL:
A PHARMACEUTICAL REFORMULATED
CONTACT: JOHNNY RUDOLPH
PHONE: (804) 447-1199
FAX: (804) 447-1194

T/I	TITLE SHEET
000.1	ADDITIONAL
000.2	FIRE ALARM PLAN
000.3	FLOOR FLOOR PLANS -
000.4	GARAGE FLOOR PLANS -
000.5	KITCHEN FLOOR PLANS -
000.6	LIVING ROOM FLOOR PLANS -
000.7	BEDROOM FLOOR PLANS -
000.8	BATHROOM FLOOR PLANS -
000.9	HALLWAY FLOOR PLANS -
001.0	PORCHES ELEVATIONS
001.1	CLOSET
001.2	STAIRS AND BREAKFAST PLAN
001.3	GRADING AND DRAINAGE PLAN
001.4	FOUNDATION PLAN
001.5	SITE LAYOUT PLAN
001.6	SITE UTILITIES
001.7	CL
001.8	CE
001.9	CR
002.0	NOTES & DOCS
002.1	NOTES & DOCS
002.2	NOTES & DOCS



1
PARCEL MAP
SCALE 1" = 60'-0"

II CAMERAS

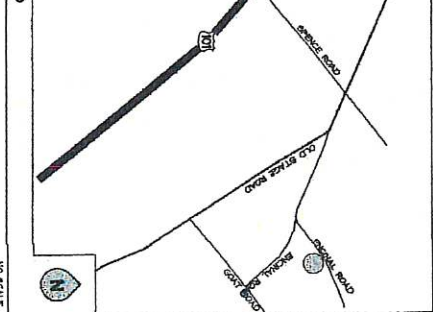
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PROJECT BUILDING DATA

BLD USE DESCRIPTION		EQ OCC	NO OCC	CONV. TYPE	BLD. HT.	GROSS LF.
1	RESIDENCE				V-B	634.4 S.F.
2	RECREATION/EDUCATION/PAVING/PAVING	F-1	F-1		V-B	4,794 S.F.
3	STORAGE	B-1	B-1		V-B	1,746 S.F.
4	CATLAYTON		U		B-B	634.4 S.F.
PARK, DETACHED RESIDENCE AREA						
1	DETAYTON		U	WA	B-B	11,473 S.F.
2	CATLAYTON		U	WA	B-B	8,429 S.F.
DORMING BUILDING AREA						
1	B-B		B-B		B-B	11,473 S.F.
2	B-B		B-B		B-B	8,429 S.F.
TOTAL RESIDENCE AREA						
1	RESIDENT		U		B-B	42,200 S.F.
2	CATLAYTON		U		B-B	49,200 S.F.
3	CATLAYTON		U		B-B	49,200 S.F.
TOTAL DETACHED RESIDENCE AREA						
1	DETAYTON		U		B-B	14,900 S.F.
2	CATLAYTON		U		B-B	4,000 S.F.
TOTAL RESIDENCE AREA						
1	RESIDENT		U		B-B	4,000 S.F.
2	CATLAYTON		U		B-B	4,000 S.F.

VICINITY MAP



TITLE SHEET

USE PERMIT FOR:
QUAIL CREEK FARMS, INC.
26400 Encinal Road
Sollis, CA 93908

III

1



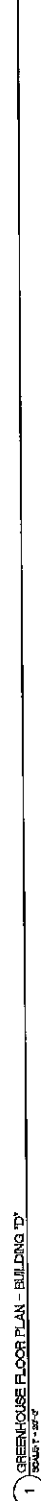
Bell
architectural group

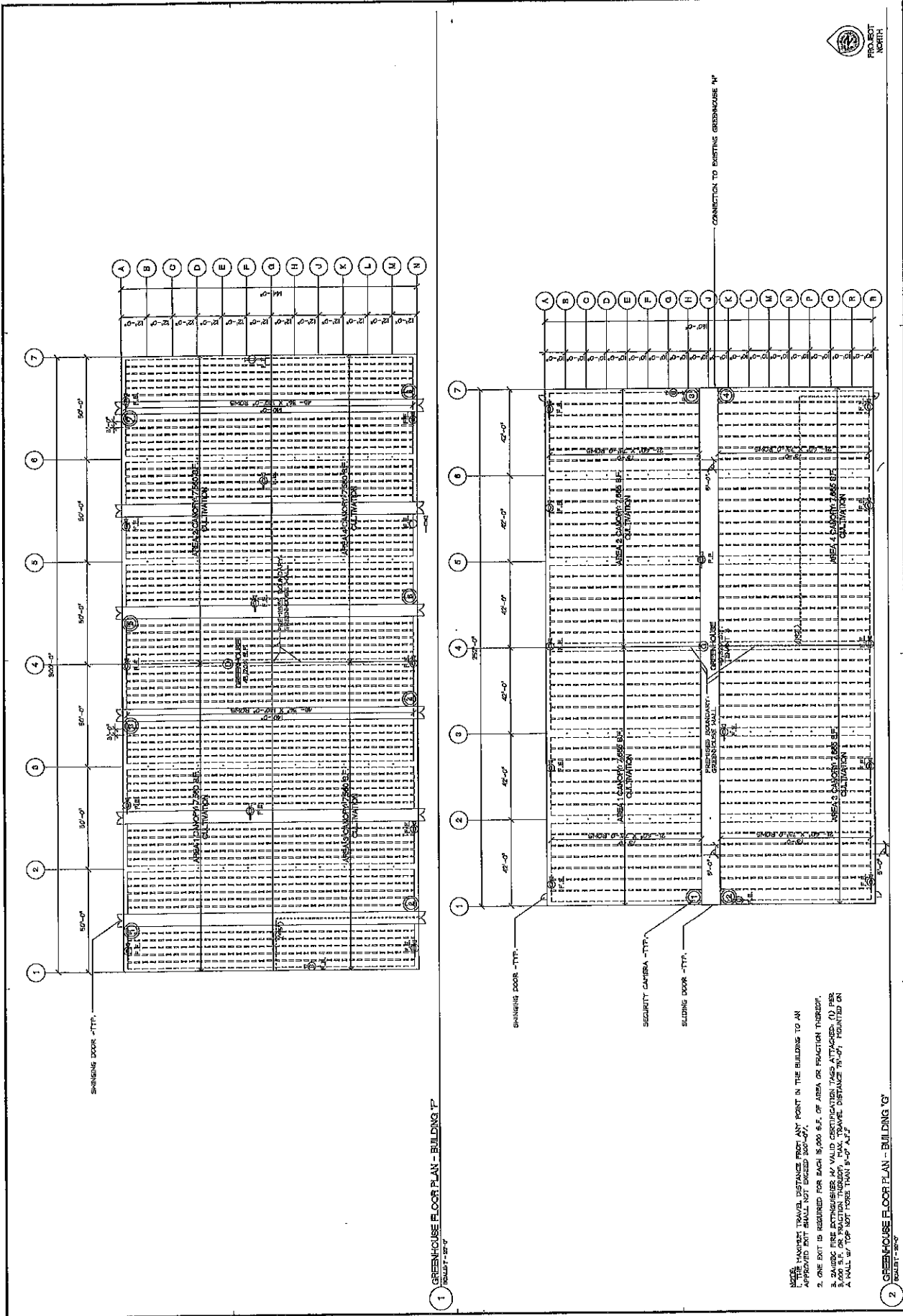
BELLI ARCHITECTURAL GROUP 831.424.4620
235 MONTEFEE STREET, SUITE B, SALINAS, CA 93901
BELLIAQ.COM

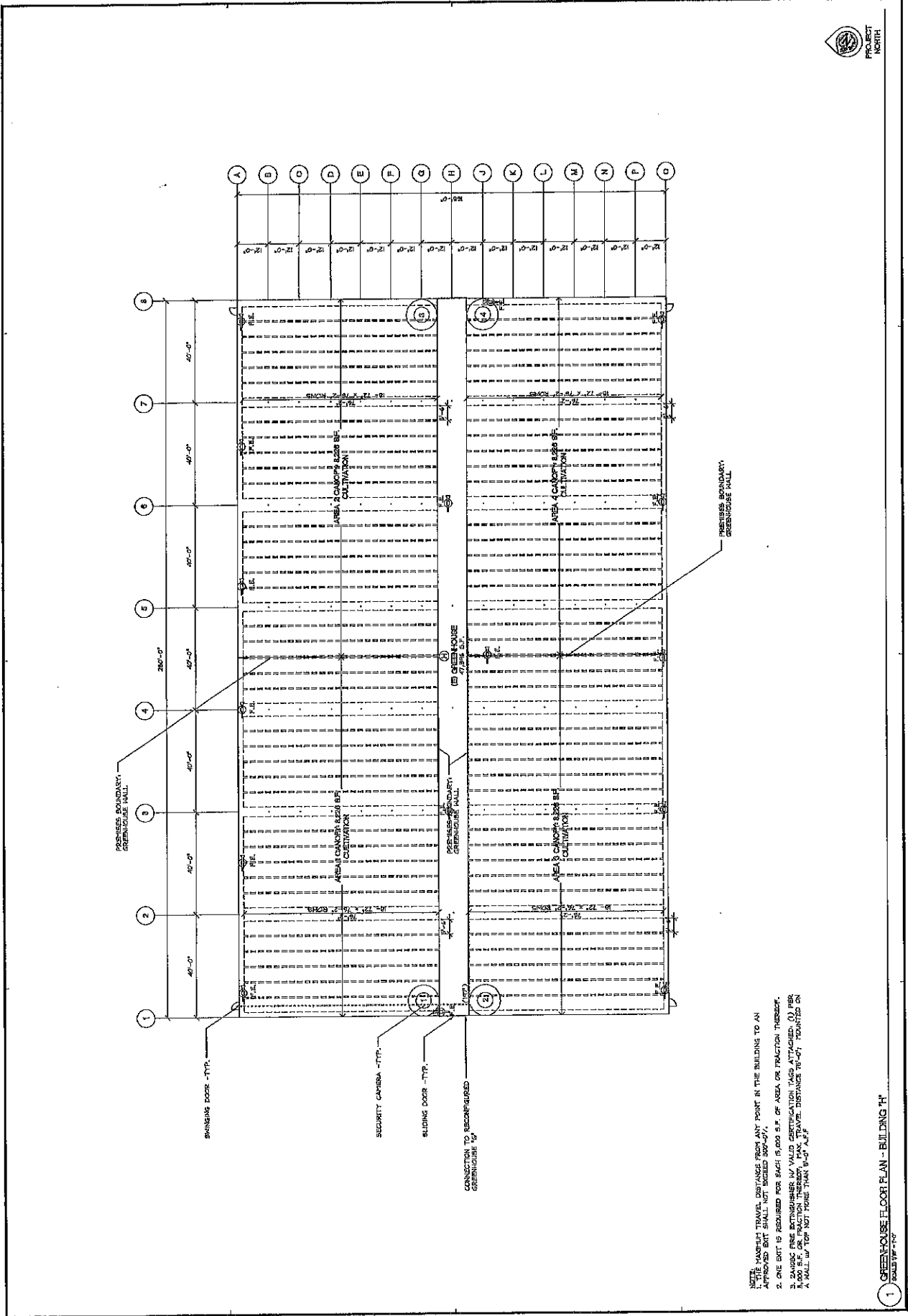


REVISIONS	DATE	BY	DESCRIPTION

7. EMERGENCY ACCESS KEY BOX. EMERGENCY ACCESS KEY BOX (KEY BOX) SHALL BE INSTALLED IN THE FIRE ALARM LOCATION SHALL BE APPROVED BY THE FIRE DEPARTMENT. THE FIRE DEPARTMENT SHALL BE NOTIFIED WHEN LOCKS ARE CHANGED. THE KEY BOX SHALL BE KEPT UNLOCKED. THE INSTALLATION OF A KEY BOX OR OTHER ACCEPTABLE MEANS FOR IMMEDIATE ACCESS BY EMERGENCY EQUIPMENT MAY BE REQUIRED.





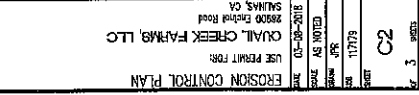
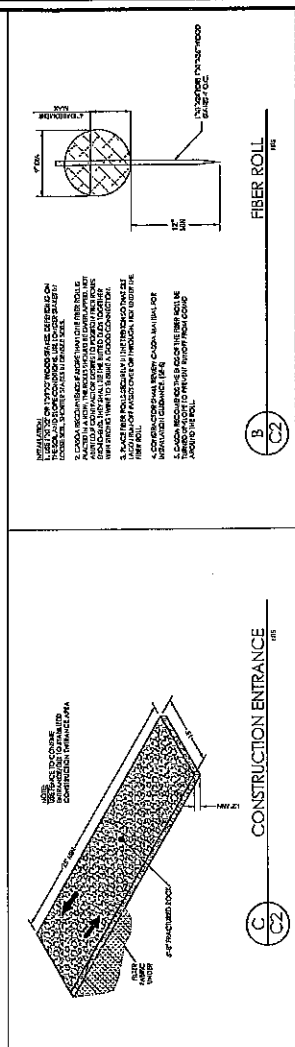


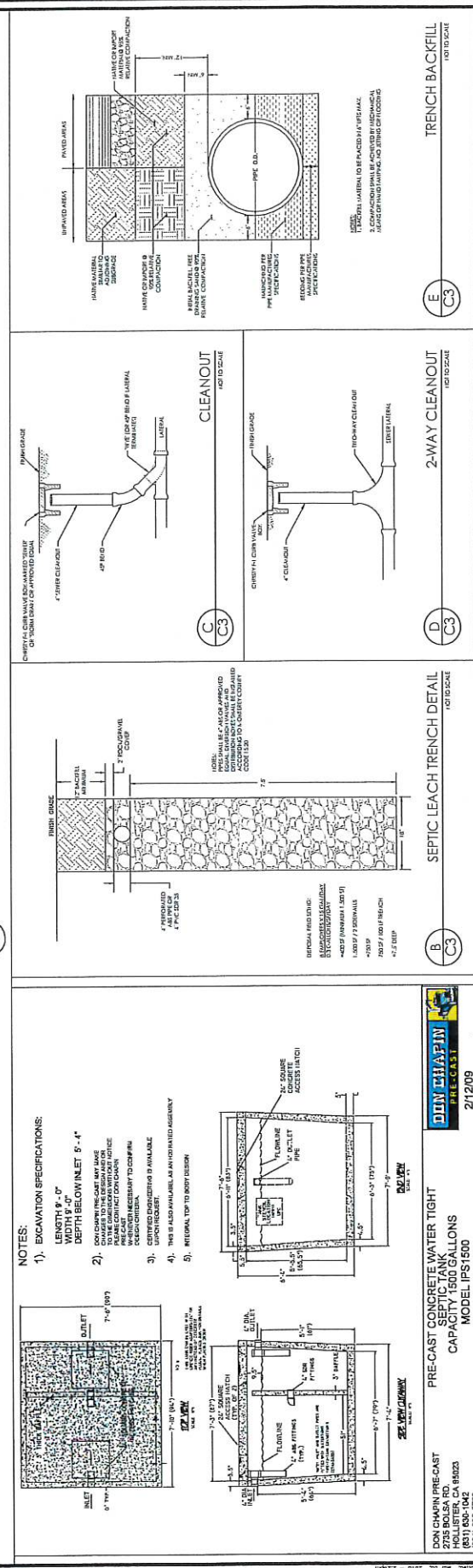
NOTE:
1. THE MAXIMUM TRAVEL DISTANCE FROM ANY POINT IN THE BUILDING TO AN APPROVED EXIT SHALL NOT EXCEED 150 FEET.
2. ONE EXIT IS REQUIRED FOR EACH 15,000 S.F. OF AREA OR FRACTION THEREOF.
3. EXITS SHALL BE LOCATED AT VARIOUS POINTS ALONG THE PERIMETER OF THE BUILDING AND SHALL BE NOT MORE THAN 10 FEET FROM THE WALL.
4. A HALLWAY SHALL BE PROVIDED TO EACH EXIT AND SHALL BE NOT MORE THAN 10 FEET FROM THE WALL.

1 GREENHOUSE FLOOR PLAN - BUILDING TYP

4
ELEVATION
INCHES/FEET - 1/8" = 1'-0"

1967 1968 1969 1970 1971 1972 1973 1974 1975 1976 1977 1978 1979 1980 1981 1982 1983 1984 1985 1986 1987 1988 1989 1990 1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070 2071 2072 2073 2074 2075 2076 2077 2078 2079 2080 2081 2082 2083 2084 2085 2086 2087 2088 2089 2090 2091 2092 2093 2094 2095 2096 2097 2098 2099 2100 2101 2102 2103 2104 2105 2106 2107 2108 2109 2110 2111 2112 2113 2114 2115 2116 2117 2118 2119 2120 2121 2122 2123 2124 2125 2126 2127 2128 2129 2130 2131 2132 2133 2134 2135 2136 2137 2138 2139 2140 2141 2142 2143 2144 2145 2146 2147 2148 2149 2150 2151 2152 2153 2154 2155 2156 2157 2158 2159 2160 2161 2162 2163 2164 2165 2166 2167 2168 2169 2170 2171 2172 2173 2174 2175 2176 2177 2178 2179 2180 2181 2182 2183 2184 2185 2186 2187 2188 2189 2190 2191 2192 2193 2194 2195 2196 2197 2198 2199 2200 2201 2202 2203 2204 2205 2206 2207 2208 2209 2210 2211 2212 2213 2214 2215 2216 2217 2218 2219 2220 2221 2222 2223 2224 2225 2226 2227 2228 2229 2230 2231 2232 2233 2234 2235 2236 2237 2238 2239 2240 2241 2242 2243 2244 2245 2246 2247 2248 2249 2250 2251 2252 2253 2254 2255 2256 2257 2258 2259 2260 2261 2262 2263 2264 2265 2266 2267 2268 2269 2270 2271 2272 2273 2274 2275 2276 2277 2278 2279 2280 2281 2282 2283 2284 2285 2286 2287 2288 2289 2290 2291 2292 2293 2294 2295 2296 2297 2298 2299 2300 2301 2302 2303 2304 2305 2306 2307 2308 2309 2310 2311 2312 2313 2314 2315 2316 2317 2318 2319 2320 2321 2322 2323 2324 2325 2326 2327 2328 2329 2330 2331 2332 2333 2334 2335 2336 2337 2338 2339 2340 2341 2342 2343 2344 2345 2346 2347 2348 2349 2350 2351 2352 2353 2354 2355 2356 2357 2358 2359 2360 2361 2362 2363 2364 2365 2366 2367 2368 2369 2370 2371 2372 2373 2374 2375 2376 2377 2378 2379 2380 2381 2382 2383 2384 2385 2386 2387 2388 2389 2390 2391 2392 2393 2394 2395 2396 2397 2398 2399 2400 2401 2402 2403 2404 2405 2406 2407 2408 2409 2410 2411 2412 2413 2414 2415 2416 2417 2418 2419 2420 2421 2422 2423 2424 2425 2426 2427 2428 2429 2430 2431 2432 2433 2434 2435 2436 2437 2438 2439 2440 2441 2442 2443 2444 2445 2446 2447 2448 2449 2450 2451 2452 2453 2454 2455 2456 2457 2458 2459 2460 2461 2462 2463 2464 2465 2466 2467 2468 2469 2470 2471 2472 2473 2474 2475 2476 2477 2478 2479 2480 2481 2482 2483 2484 2485 2486 2487 2488 2489 2490 2491 2492 2493 2494 2495 2496 2497 2498 2499 2500 2501 2502 2503 2504 2505 2506 2507 2508 2509 2510 2511 2512 2513 2514 2515 2516 2517 2518 2519 2520 2521 2522 2523 2524 2525 2526 2527 2528 2529 2530 2531 2532 2533 2534 2535 2536 2537 2538 2539 2540 2541 2542 2543 2544 2545 2546 2547 2548 2549 2550 2551 2552 2553 2554 2555 2556 2557 2558 2559 2560 2561 2562 2563 2564 2565 2566 2567 2568 2569 2570 2571 2572 2573 2574 2575 2576 2577 2578 2579 2580 2581 2582 2583 2584 2585 2586 2587 2588 2589 2590 2591 2592 2593 2594 2595 2596 2597 2598 2599 2600 2601 2602 2603 2604 2605 2606 2607 2608 2609 2610 2611 2612 2613 2614 2615 2616 2617 2618 2619 2620 2621 2622 2623 2624 2625 2626 2627 2628 2629 2630 2631 2632 2633 2634 2635 2636 2637 2638 2639 2640 2641 2642 2643 2644 2645 2646 2647 2648 2649 2650 2651 2652 2653 2654 2655 2656 2657 2658 2659 2660 2661 2662 2663 2664 2665 2666 2667 2668 2669 2670 2671 2672 2673 2674 2675 2676 2677 2678 2679 2680 2681 2682 2683 2684 2685 2686 2687 2688 2689 2690 2691 2692 2693 2694 2695 2696 2697 2698 2699 2700 2701 2702 2703 2704 2705 2706 2707 2708 2709 2710 2711 2712 2713 2714 2715 2716 2717 2718 2719 2720 2721 2722 2723 2724 2725 2726 2727 2728 2729 2730 2731 2732 2733 2734 2735 2736 2737 2738 2739 2740 2741 2742 2743 2744 2745 2746 2747 2748 2749 2750 2751 2752 2753 2754 2755 2756 2757 2758 2759 2760 2761 2762 2763 2764 2765 2766 2767 2768 2769 2770 2771 2772 2773 2774 2775 2776 2777 2778 2779 2780 2781 2782 2783 2784 2





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FALLONS
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HOLLISTER, CA 95023
(831) 830-1042

1672302763

MONTEREY COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH BUREAU
WATER SYSTEM INSPECTION REPORT

Inspector: [Name] Date: 8/13/17
Project: [Name] Date: 8/13/17
Billing Address: [Address] Phone: [Phone]
Physical Address: [Address] Phone: [Phone]

Inspector: [Name] Date: 8/13/17
Project: [Name] Date: 8/13/17
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Project: [Name] Date: 8/13/17
Billing Address: [Address] Phone: [Phone]
Physical Address: [Address] Phone: [Phone]

NOTES & DOCS

DATE: 2/2/08
PAGE: 1/1
DATE: 2/2/08
PAGE: 1/1

USE: PERMIT FOR
QUAL: CREEK FARMS, INC.
26900 Evelyn Road
Salinas, CA 93908

DATE: 2/2/08
PAGE: 1/1
DATE: 2/2/08
PAGE: 1/1

MONTEREY COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH BUREAU
WATER SYSTEM INSPECTION REPORT

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MONTEREY COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH BUREAU
WATER SYSTEM INSPECTION REPORT

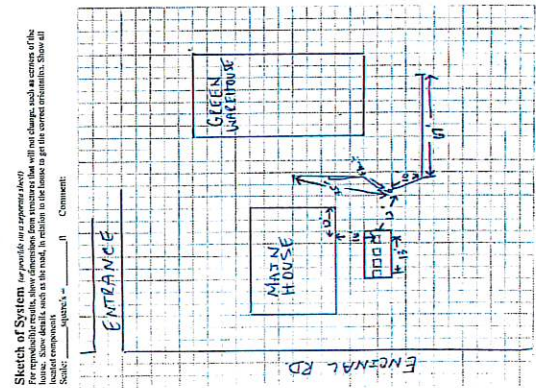
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MONTEREY COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH BUREAU
WATER SYSTEM INSPECTION REPORT

Inspector: [Name] Date: 8/13/17
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Billing Address: [Address] Phone: [Phone]
Physical Address: [Address] Phone: [Phone]

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Conventional OWTs Inspection Report