



Security Plan: West Manor

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Pacifica CA 94044

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OBJECTIVE:

West Manor's objective is to acquire a local and state marijuana use permit and public safety license required to operate a Type-6 Manufacturing and a Type-11 Distribution license. We will pay all imposed public safety license fees and intend to operate within local and state regulations and guidelines. Upon being issued any license, we shall prominently display the license within the premises where it can be easily viewed by state and local agencies.¹ The Safety and Security Plan applies to all company employees, visitors, vendors and outside carriers.

Conditions of Operation:

Security is of the utmost importance to West Manor. West Manor's security plan will provide adequate security on the premises by maintaining and exceeding the minimum-security standards required by local and state regulations. West Manor will designate a Director of Security to help develop, implement, and maintain a sound security plan to be updated regularly and ensure compliance with City and State regulations. The Director of Security will be responsible for communicating all Security and Safety protocols and procedures for West Manor employees and personnel. Additionally, the Director of Security will periodically review the Security and Safety Procedures to ensure best practices are being utilized and any security and/or safety concerns are being addressed.

SECURITY PROCEDURES²

The purpose of our Security Plan is to prevent theft or loss of cannabis and cannabis products while ensuring the safety of the public as well as our employees. West Manor is committed to monitor activities related to cannabis operations and have outlined procedures for the investigation of suspicious activities. West Manor has implemented several monitoring and preventative measures to prevent theft or loss of cannabis and cannabis products. These includes but are not limited to:

- I) Surveillance and system: 24-hour, fully monitored surveillance with footage stored for 90+ days and recordings made available upon request. Alarm system responded to by the Pacifica Police Department.
- II) Windows and window coverings: No windows with visibility into the distribution or manufacturing areas
- III) Commercial-grade locks on doors.

¹ § 5039. License Posting Requirement. Upon issuance of any license, the licensee shall prominently display the license on the licensed premises where it can be viewed by state and local agencies.

² §40200. Security Plan

- IV) Employee Badges: All employees must wear company badges at all times.
- V) Visitor Management Policy: All visitors must present identification, sign in and wear visitor badges at all times.
- VI) Regular Inventory Reconciliations: Discrepancies in inventory will be discovered quickly so that full audits may be conducted, and we may refer to video footage if necessary.

Section 1: Surveillance System

West Manor shall be monitored at all times by a CCTV surveillance system. The system will provide surveillance of both interior and exterior areas of the premises. Cameras will be permanently mounted in fixed locations and clearly record activity occurring within 20 feet of all points of entry and exit on the premises. Additionally, cameras shall have clear views of any areas where cannabis goods are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises. Areas storing the surveillance-system storage device will also be kept under 24-hour surveillance.

All cameras will be HQ/HD, color and night vision capability to ensure the ability to record useful footage and to readily identify any individual on or adjacent to the property. The surveillance system shall record continuously, 24-hours per day, with a minimum resolution of 1280 x 720 pixels, and at a minimum speed of 15 frames per second. Security rooms and the areas in which the physical media or storage device on which surveillance recordings are stored in a secured manner to protect the recording from tampering or theft.

All recordings will be kept for no less than ninety (90) days and will be provided to the City Police Department with-in twenty-four (24) hours of receiving such a request. Additionally, an online IP address can be provided should recordings be needed immediately upon request. A sign shall be posted inside and at the entrances to the establishment indicating the premises are under 24-hour video surveillance.³

Video Surveillance System Information:

PRO-1080MSB Thermal-Sensing Security Camera
1080p Full HD DVR Security System
1TB HDD, Heat & Motion Sensing + Night Vision
SWDVK-8458

³§ 5044. Video Surveillance System.

Section 2: Alarms Systems and Critical Facility Protection Systems:

West Manor will be installing a security alarm system to notify of us any possible security violations and record incident(s) where physical barriers have been breached. Alarm systems will be activated at points of entry with motion detectors throughout the premises. Alarm systems will be utilized to monitor premises, protect employees within the facility, and prevent unauthorized access to facility. The Director of Safety, as well as owners, will have keys and access codes to the alarm system and the building. This information will remain confidential and secured to prevent access to the establishment by anyone other than authorized employees. Only the owners, Safety Directors, and Facility Managers shall have the ability to unlock exterior doors for the purposes of commencing business, and to activate or deactivate the personnel access.

West Manor shall hire a licensed alarm company to install, monitor, and maintain the alarm system. In conjunction with the alarm company, owners and the Safety Director is responsible for monitoring surveillance footage and the alarm system.⁴

Professional alarm monitoring will be provided by:

Muscio Electric

Lic # AC03696

Contact info: 901 Palmetto Ave unit D, Pacifica CA 94044

Holdup alarm system:

Hold up alarms will be used in the event of serious breaches in security. Hold up alarms result in the dispatch of the Pacifica Police Department. West Manor will have a remote activated hold up alarms in the following locations:

- Safes: Located in the distribution center, bolted to the ground.
- Near loading areas: While conducting tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles).

Section 3: Shared Premises

West Manor shares the facility with a distribution and manufacturing license under the same ownership. Licensees will be sharing the Safety Director to monitor the shared video surveillance and alarm systems. The Facility's Safety Director will be responsible for contracting the alarm companies. Employees and management of both licensees will be held accountable and responsible for adhering to security procedures and subject to discipline for any violations of alarm system requirements.

⁴ § 5047. Alarm System.

Section 4: Limited-Access Areas

The entire premises is considered a limited-access area.⁵ Entrances to all limited-access areas shall have solid doors and commercial-grade locks meeting all regulatory requirements. For the purpose of this section, authorized individuals include outside vendors, contractors, or other individuals conducting business that requires access to the limited-access areas. An individual who enters the limited-access area and is not employed by the licensee shall be escorted by an employee of the licensee at all times while within the limited-access area. In accordance with our Visitor Management Policy, West Manor maintains records of all authorized individuals who are not employees of the licensee who enter the limited-access areas. The record shall include the name of the individual, the company the individual works for, the reason the individual entered the limited-access area, the date, and the times the individual entered and exited the limited-access area. These records shall be made available to the Bureau immediately upon request. Entrances to all limited-access areas shall have a solid door with commercial-grade, non residential locks satisfying the regulatory requirements.⁶ Doors to limited-access areas will remain closed and only accessible with a key at all times.

Locking Devices and Key Controls:

West Manor will establish physical barriers to secure perimeter and all points of entry into the manufacturing and distribution premises. Some of these barriers include locking primary entrances with commercial-grade, non-residential door locks. All external and internal windows will be secured with locking devices. Management and personnel must control the issuance of all keys to prevent access to the manufacturing/distribution premises by unauthorized personnel and protect the physical safety of employees.

Section 5: Exterior Facility & Loitering

West Manor shall have security cameras on the outside of the premises to prevent loitering, nuisance, and unlawful activities including the illegal sale or consumption of marijuana by regular monitoring of the surveillance system. West Manor shall report unlawful activity to local law enforcement and shall keep a record of all such incidents. Reasonable steps will be taken, if necessary, to prevent repeated offenses including removing items that facilitate loitering or any type.

LIGHTING PLAN

All existing lighting of the exterior premises and interior lighting levels will be more than the minimum necessary to provide adequate security lighting for the use and comply with all standards of the City of Pacifica regarding lighting design and installation. In partnership with our security plan, this will help insure no loitering or negative behaviors will be kept to a near

⁵ § 5042. Limited-Access Areas.

⁶ § 5046. Locks.

to perfect minimum. A diagram showing existing and proposed exterior premises and interior lighting levels that would be the minimum necessary to provide adequate security lighting is presented as an attachment to this operations plan. All lighting will comply with all City standards regarding lighting design and installation

Windows and window covering:

West Manor will maintain the premises such that visibility and security monitoring of the premises is possible. Windows and façade of the facility will not be changed and will be in compliance with local ordinances to prevent loitering. Any skylights will be monitored by video surveillance and motion detection provided by the alarm company.

Doors:

All doors that are separated by walls shall remain closed to ensure proper standard operating that shall also include proposed common or shared areas of the property. Such areas may include lobbies, bathrooms, hallways, and break rooms. Doors through which personnel enter or exit will be monitored.

Parking:

West Manor has one dedicated off-street parking space in the facility. Additionally, West Manor has one enclosed off-street loading/parking space within the facility. West Manor will not be open to the public, with a limited number of visitors each day, and expects to employ two (2) part-time employees. West Manor will not require more than one off street parking space and will be requesting a parking space exception to meet the requirements of the number of parking spots required by the City of Pacifica.⁷

Section 6: Reasonable steps of enforcement

West Manor intends to use reasonable steps of enforcement to prevent access to the distribution manufacturing premises by unauthorized personnel and to protect the physical safety of our employees. This includes, but is not limited to:

- Facility protection systems: The 24-hour video surveillance and alarm security system shall be secured and monitored for unauthorized tampering, malfunctions, or possible loss in connectivity and/or system shut-down. All entries into the video surveillance and/or alarm systems, including that for regular maintenance, shall be logged with date, time, and reason for access so that the integrity of monitored alarms and video surveillance is maintained.
- Secured recordkeeping: Physical records will be stored securely with back-up electronic records stored in a manner that prevents unauthorized access.

⁷Pacifica Municipal Code (PMC) Section 9-4. 2818(c)(4)

- Prevention of Loitering: No seats or smoking areas will be permitted outside of the facility to reduce all temptation for loitering. West Manor will not have any areas on the premises that are unmonitored or unlit.
- West Manor will notify the Bureau and law enforcement within 24 hours after discovering diversion, theft, loss, or any criminal activity involving the cannabis operation, including significant discrepancies identified during inventory, or any other breach in security.⁸ West Manor will take the appropriate steps to resolve any issues regarding nuisance unless doing so would place anyone in danger or a harm to personal safety.
- Notifications to the Bureau and local law enforcement: Notifications to the Bureau shall be submitted on the Notification and Request Form, BCC-LIC-027. Notifications regarding any breach in security shall include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.⁹
- Right of Access: The Bureau shall have full and immediate access to inspect the premises without prior notice.¹⁰ Local law enforcement, and other regulating agencies may enter and inspect West Manor at any time during normal business hours with reasonable notice on any day of the week or at any reasonable time to ensure compliance and enforcement. At no time will West Manor or any employee, representative, other person refuse, impede, obstruct, or interfere with an inspection.
- Visitor Management Policy: West Manor will establish an identification verification process and sign-in/sign-out procedures for authorized personnel, vendors, suppliers, contractors, and/or other authorized visitors in order to limit access of additional personnel to the licensed premises. Access will be limited to those necessary to complete job duties, and to the time-frames specifically scheduled for completion of these projects. Additionally, there will be records kept of all visitors and other non-employees given access to the premises.
- Premises Maintenance: West Manor will establish routine maintenance procedures to additionally detour public nuisance by regularly removing trash and posting signs to discourage loitering, excessive noise, and prohibit the use of cannabis and other illicit drugs. West Manor will take reasonable steps to enforce these policies by calling law enforcement, requesting persons engaging in these activities to vacate the premises, and make other necessary efforts to remove any items that may facilitate or encourage loitering.

⁸ (PMC) Sec. 4-16.03(c)(1)(i)(aa); §5036. Notification of Theft, Loss, and Criminal Activity.

⁹ Business and Professions Code: Sections 26070 and 26013.

¹⁰ § 5800. Right of Access.

Section 7: Employees

All employees of West Manor will be 21 years of age or older.¹¹ Employees will be assigned an Employee I.D. number. Employee I.D. numbers are unique to each individual and are retired when an individual's employment ends. Employee I.D. numbers are never reused. If an employee is rehired by West Manor, the employee will be issued a new Employee I.D. number.

Employees are required to wear company-issued Employee I.D. badges at all times they are engaging in commercial cannabis activity for West Manor. Employee I.D. badges will be laminated or plastic-coated and will contain, at a minimum, West Manor's name and license number, the employee's first name, the unique employee identification number, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.¹²

Employee Personal Items

In order to limit the possibility of cross-contamination and maintain inventory controls, West Manor will provide designated areas in which personnel may store and access personal items by providing Employee Break and Storage Areas. This is intended to prevent the movement of cannabis and cannabis goods out of production areas and deter any possibility of theft and diversion. Employee break and storage areas are property of West Manor/ West Manor reserves the right to inspect all employee break and storage areas on the premises at any time and for any reason.

Drug-Free Workplace

West Manor is a drug-free workplace. Employees, visitors, and all other personnel are prohibited from using or possessing tobacco products, alcohol, and/or any other controlled substances or illicit drugs on-site. Smoking, vaping, ingesting, or using cannabis or cannabis products on the premises in any way is strictly prohibited.

Section 8: Inventory

West Manor will establish an inventory system to track cannabis material and the personnel responsible for processing it throughout the manufacturing and distribution process. West Manor's inventory procedures will adhere to all requirements of the state-mandated Track and Trace System.¹³ The Track and Trace System will keep records of all purchase, sales, testing, packaging, transfer, transportation, return, destruction and/or disposal of all cannabis goods in

¹¹§ 5031. Age Restriction.

¹² § 5043. Licensee Employee Badge Requirement.

¹³ § 5048. Track and Trace System.

West Manor's possession. Additionally, West Manor will maintain internal records to ensure complete and accurate inventory. West Manor's Account Manager shall maintain a complete, accurate, and up-to-date list of all track and trace system users, consisting of their full names and usernames. West Manor shall monitor all compliance notifications from the track and trace system, keep record of such notifications, and resolve these issues in a timely manner. If West Manor is unable to resolve a compliance notification within three business days of receiving the notification, the Bureau shall be notified immediately.

Transferring of Cannabis Goods

Prior to transporting any cannabis goods, West Manor will generate a shipping manifest through the track and trace system and register the transfer of cannabis goods to the receiving licensee.¹⁴

Prior to receiving any cannabis goods, West Manor will verify that a shipping manifest has been generated by the originating licensee through the track and trace system. West Manor shall inspect the incoming product to ensure that the cannabis goods received are as described in the shipping manifest prior to acknowledging receipt of the cannabis goods in the track and trace system. If there are any discrepancies between the type or quantity of cannabis goods specified in the shipping manifest and the type or quantity received, West Manor's policy is to reject the transfer until the manifest can be updated accurately.

Inventory Reconciliations

In order to maintain inventory control and identify any issues with inventory management, West Manor will conduct full inventory reconciliations at least every 30-days. If consistent discrepancies in inventory are found, reconciliations will be conducted more frequently. Significant discrepancies in inventory shall be reported to the Bureau and local law enforcement within 24-hours of discovering the inventory discrepancy. Significant discrepancies in inventory are defined as a difference in actual inventory compared to inventory records with a difference of at least 3 percent of West Manor's average monthly sales, calculated based on the average total of sales from the previous 6 months.¹⁵

Section 9: Employee Safety & Hazardous Materials

Safety is of the utmost importance to West Manor. West Manor's manufacturing plan includes the usage of certain hazardous or flammable materials that may include materials such as isopropyl alcohol, hydrogen peroxide, bleach, and dry ice. West Manor will maintain, at all times, a list of all hazardous or flammable materials on-site. Material Safety Data Sheets will be maintained and readily available to employees and first responders in case of an emergency. Procedures for the usage and proper storage of all materials considered to be

¹⁴ § 5311. Requirements for the Transportation of Cannabis Goods.

¹⁵ § 5034. Significant Discrepancy in Inventory.

hazardous will be provided to employees and local and state officials as required. A complete, updated list of materials kept on-site will be made available to the City of Pacifica and the Bureau.

A detailed Health and Safety Plan will be provided to ensure the safety of the public as well as West Manor's employees. Within one year of hiring our first employee, West Manor will have a manager complete the state-required 30-hour OSHA Occupational Hazard Training Course and develop a full Injury and Illness Prevention Plan and Employee Training Program.¹⁶¹⁵ West Manor's Health and Safety Plan will include procedures related to the following:

- I) Personal Protective Equipment
- II) Facility Protection Systems: fire suppression system, alarm systems, hazardous gas detection systems
- III) Emergency Response Plan
- III) Emergency Evacuation Plan (Posted)
- IV) Hazardous Materials On-Site
- V) Employee Training Materials
- VI) Injury & Illness Prevention Plan

¹⁶¹⁵ § 5002. Annual License Application Requirements.