



March 8, 2022

Bart McDonough, Town Planner
Town of Kittery
200 Rogers Road
Kittery, Maine 03904

**RE: Town of Kittery, Planning Board Services
8 Dexter Lane Adult Use Marijuana Retail Facility
Traffic and Odor Control Review
Tax Map 47, Lot 3
CMA #591.141**

Dear Bart:

CMA Engineers has received the following information for Assignment #141, review of aspects of a Site Plan application, located at 8 Dexter Lane for an adult use marijuana retail facility.

- 1) Site Plan Review Application for The Outlet Mall of Kittery, LLC, prepared by Attar Engineering of Eliot, ME dated November 18, 2021. Ward, Inc.

The applicant proposes to convert an existing retail facility (formerly a luggage store) into an adult-use marijuana retail facility. The space is part of an existing larger retail facility housing other retail operations. There are virtually no physical changes proposed for the change of use. Accordingly, the applicant has requested a variety of waivers of Kittery LUDC regarding site plan approval requirements.

1. The applicant has prepared a traffic impact study for the change in use (completed by Sewall Company of Bangor, Maine).
2. As a marijuana business, the Kittery LUDC requires that the operations describe protocols for marijuana odor control, that such odors not be detectable beyond the area controlled by the business, and that odors be controlled by whatever best practices exist.

We have reviewed the information submitted with a focus on these two issues.

Traffic Impact Study

A traffic impact study was completed by the Sewall Company (December 2021) using conventional methodologies, including estimates of traffic generation from marijuana dispensaries in the Institute of Traffic Engineers (ITE) trip generation document. The results indicate that there is insignificant deterioration of performance levels at the signalized intersection to the north of the Dexter Lane/Route 1 intersection, and the Dexter Lane/Route 1 intersection.

The study assumes that the majority of traffic to the facility will use the signalized intersection north of Dexter Lane. However, access to the site appears to CMA Engineers to be more direct via Dexter Lane from vehicles coming from the south. We note that GPS routes to the 8 Dexter Lane address are directed via the Dexter Lane intersection with Route 1, and we would expect more trips to be assigned in the analysis to enter/exit via this intersection. Sewall should justify the predominate use of the signalized intersection north of Dexter Lane or redo the analysis of the Dexter Lane unsignalized intersection.

Marijuana Odors

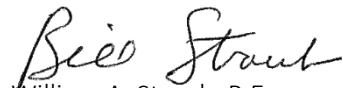
We understand from discussions with you regarding the proposal, that all marijuana product entering and leaving the facility will be pre-wrapped in fitted plastic. Retail sales of finished product which is wrapped poses significantly less risk of odors than cannabis cultivation or processing facilities. If the marijuana plant/flower product is not exposed to the air, the potential for generation of marijuana odors is minimized. If this approach is taken, strict adherence to an operating plan would be advisable.

However, people's sensory abilities with regard to odors and marijuana odors vary, and once detected off-site, perceptions of odors are difficult to manage. In addition to packaging of marijuana product, best practices would include positive air handling, and filtering of all exhaust air through carbon cannister(s). We would suggest that the applicant be required to incorporate such a system which is developed by a qualified HVAC contractor or engineer that can document and certify the appropriate sizing, operations and maintenance, and design details for such odor control. Odor control of marijuana has become an area of service regionally and nationally.

Should you have any questions, please do not hesitate to call.

Very truly yours,

CMA ENGINEERS, INC.

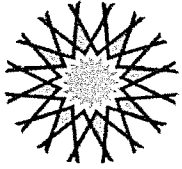


William A. Straub, P.E.

Project Manager

cc: Brian Nielsen, EIT Attar Engineering

WAS:rol



ATTAR

ENGINEERING, INC

CIVIL · STRUCTURAL · MARINE

Bart McDonough, Town Planner
Town of Kittery
P.O. Box 808
Kittery, Maine 03904

March 9th, 2022
Project No.: C278-22

**Re: 8 Dexter Lane Suite #8
Adult-Use Marijuana Retail**

Dear Mr. McDonough:

On behalf of the applicant, Tree Tips 3 LLC, please find attached to this letter an operations plan to supplement our Site Plan Application for an Adult-Use Marijuana Store within an existing building at 8 Dexter Lane Suite #8 in Kittery for your review and consideration.

Suite #8 will contain Tree Tips 3 LLC's Retail Use and have a customer space of approximately 1,941 square feet. The entire suite is approximately 2,742.5 square feet.

During the site walk on February 1, 2022, several questions were raised. Please allow me to answer them below.

- Planter boxes were suggested outside of the suite entrance, and the applicant agrees that it would be a great idea. The applicant will discuss specific options with the landlord.
- If snowfall exceeds the on-site storage capacity the excess snow will be hauled away. A note has been added to the site plan.
- Proposed signage will be designed per the Kittery Ordinance and there will be no signs visible from I-95.
- ADA Access will remain as it currently exists on-site.
- Per the Operations Plan no cultivation or manufacturing activities will take place on-site. To ensure no odors become a nuisance each product is packaged in an airtight container, all products will be stored in the vault room and a carbon scrubber will be located on the dispensary floor. For more details, please see the attached Operations Plan.
- The lease is limited to Suite #8. A new demising wall between Suites #7 and #8 is shown on the floor plan.
- Should the queue extend outside of the store a security staff will be present to perform crowd control. Should it be necessary, Tree Tips will work with the Kittery Police Department to provide a security detail to further assist

however in past experience this has not been necessary.

- There is no physical barrier beyond the reception desk. Once the customer is checked in a second time at the reception area, the customer can continue to the point-of-sale station to make a purchase. This is consistent with state regulations. Security staff will be on-site to ensure compliance with procedures put in place.
- Marijuana waste, per state policy, is rendered "inert" by mixing it with non-cannabis materials such as rock salt. From there it is placed in a locked trash dumpster for disposal along with normal business waste. The actual hauler would be the local trash management company. There is no specialty hauler for cannabis waste once it is rendered inert.

Thank you for your time and we look forward to discussing the project at the next available meeting.

Sincerely,



Brian Nielsen
Staff Engineer

cc: Tree Tips 3 LLC

Tree Tips 3 LLC

Description of Floor Plan

Prepared for Town of Kittery Marijuana License Application

Tree Tips 3 LLC is proposing a Marijuana Retail Store to be located at 8 Dexter Lane, Suite 8, Kittery, ME, 03904. This is an existing building that has been used historically as retail. We will be doing an interior fit up to the space to accommodate our usage, and have designed a floor plan that will allow us to operate a safe, compliant Marijuana Retail Store here in Kittery. This document will describe the floor plan that is included in this submission.

Overview:

Tree Tips 3's owner, Nick Friedman, has a proven track record of operating safe and successful dispensaries both in Maine and Massachusetts. The floor plan created for this location has been based off extensive experience learning what works best for a dispensary.

At the highest level, the occupied space has a total square footage of 2,742 square feet. The customer accessible square footage, as measured by our architectural firm, BRIBURN, and detailed in our plans, is 1,940 square feet, under the 2,000 sq. ft. maximum required by the Town's ordinance.

The response will provide a narrative of how our floor plan works, detailing both the "Front of House" where customers go and interact with our employees, as well as the "Back of House" where only employees work.

Reception (Front of House):

Prior to entering the dispensary, customers are required to show their identification, verifying they are 21+ years of age, to our security staff member, who will be positioned outside our customer entrance. Once the ID is checked, the security staff will open the front door, admitting them into the dispensary. Once inside, the customers will present their ID a second time. Our receptionist will perform a second identification check using an ID verification device called "ID Science". Once their identification has been fully verified, they are permitted to proceed to sales counter on the Dispensary Floor.

Dispensary Floor (Front of House):

The dispensary floor is the central location for our customers. On the dispensary floor, we will have educational materials as well as apparel and accessory products that customers can browse on the left-hand side of our dispensary floor. No marijuana or marijuana products are ever located on the dispensary floor. To make a purchase, customers most go to our point-of-sale stations where a customer service agent will help guide them to their desired cannabis products.

Point of Sale Counter (Front of House):

The POS Counter provides a secure barrier/separation between our customers and our team members, keeping our marijuana inventory secured and only accessible to our staff. The marijuana inventory that is to be sold that day is stored in locked cabinets under the Point of Sale Counter. Our floor plan shows for 5 walk-up POS stations as well as 3 pre-order POS stations. The pre-order stations are for customers who placed an order online to be picked up in store, allowing for a faster checkout process. Our counter will include one ADA station that is wheelchair accessible. It is important to note that absolutely NO customers are ever allowed behind the Point of Sale Counter. A locking door provides our staff the ability to enter the dispensary floor if needed.

Once a transaction has been completed, the customer will leave the dispensary through the door they came in. Customers are reminded that we have a strict no-loitering policy.

Bathrooms (Front and Back of House):

Bathrooms will be ADA accessible; one bathroom is available for customers, one bathroom is only for our staff, accessible from the back of house.

Flex Room (Back of House)

The flex room is a secured room where staff will receive cannabis deliveries. All deliveries are scheduled in advance, and arrive in an unmarked vehicle. When the delivery vehicle arrives on site, the driver calls our manager on duty to let them know they have arrived, and the driver is directed to pull up to the rear entrance that opens directly into this room. Once our safety and security team has verified the area is safe (using the video surveillance system), the door is opened, and airtight, secured bins containing cannabis product are transported into this space. Once finished, the door is closed/locked, and the vehicle would leave.

Once the inventory is inside the building, our inventory team verifies the weights and quantities of the products received in this room. They are entered into the inventory control system and moved into the vault room for secure storage.

Vault (Back of House)

The vault room is where all cannabis inventory is stored. The vault room has extensive security features as discussed in our operations plan, and access to the vault room is limited to management only. The vault room will also contain a safe that is secured to the floor and in which any cash is stored. The vault room is fully climate controlled and will contain a carbon scrubber to reduce the risk of any odors. Cannabis waste is also stored in this space, in a separated secured bin.

TREE TIPS 3 LLC

Operations Plan

Prepared for: Town of Kittery, Retail Marijuana License Application

Proposed Location: 8 Dexter Lane, Suite 8, Kittery, ME, 03904

This Operations Plan will follow the below outline:

- 1. Security plan*
- 2. Provisions to ensure against loitering and using marijuana and marijuana protects on or near the premises*
- 3. Protocols for hiring and training employees*
- 4. Experience and training in the State of Maine's seed-to-sale tracking system*
- 5. Protocols for odor control and disposal of waste marijuana and marijuana products*
- 6. Protocols for ensuring the safety and security of product*
- 7. Fire Suppression annual certification*

SECTION 1

Security Plan

Introduction

Nick Friedman, owner and manager of Tree Tips 3 LLC's ("COMPANY"), has a proven track record of safely operating cannabis dispensaries in highly regulated markets, having designed and operated six licensed cannabis dispensaries in Maine and Massachusetts. Mr. Friedman will implement extensive safety and security measures at 8 Dexter Lane, Suite 8 in Kittery, to protect our facility, our customers, our staff, and our neighbors.

In Kittery, we will contract with Interface Security Systems to execute these plans. We appreciate that there are many security risks when operating a marijuana dispensary. We take this responsibility seriously and believe to be well positioned to operate a safe, secure, and fully compliant dispensary.

Video Surveillance

COMPANY will contract with Interface Security Systems to install the physical security system for our dispensary. Security features include but are not limited:

1. The entire perimeter of the facility, will have outdoor lighting fixtures operating from sunset to sunrise 365 days per year. This lighting will be sufficient to deter nuisance and criminal activity, will facilitate surveillance, but will have proper light cutoffs to ensure that it does not disturb our neighbors
2. Should any exterior lighting fail, our exterior cameras are able to operate in low to no light.

3. The entire perimeter of the facility, including entrances and exits, will have digital camera coverage.
4. The entire inside of the facility, including the interior of the vault, will have digital camera coverage.
5. Our critical data will be stored in a secured server room, inside our dispensary, with secured access.
6. All footage will be saved for a minimum of 45 days and will be made accessible to State inspection agents and local law enforcement.

(PLEASE NOTE — copies of our security plan diagram are not included here as they are confidential and including in public applications could pose a public safety risk. We will share these plans directly with the Chief of Police).

Alarm System

COMPANY will install during construction, an alarm system in full compliance with all applicable State regulations, in order to provide ongoing alarm protection (24/7). When triggered, this alarm system automatically alerts local law enforcement and COMPANY management. Features of our alarm system include but are not limited to:

1. The alarm system will have motion sensors throughout the facility that will be armed when the business is closed.
2. The system will have panic buttons in key areas such as the vault room, behind the sales counters, and in the entrance room. These panic buttons silently alert law enforcement to a potential threat exits.
3. Door contact sensors on all exterior doors, including emergency exits.
4. All dispensary windows will have glass break sensors
5. The alarm system will have both battery backups in case of power loss, and a cellular backup in case the telephone line goes down. In either event, both local law enforcement and COMPANY management will be notified instantly that the system is now on either backup power or cellular backup.

Access Control

In addition to our physical security system, COMPANY will install access control to ensure that we deter and prevent the unauthorized access into our dispensary, and into certain restricted areas of our dispensary. First, our dispensary operates as a non-public facility - all entrances will be locked at all times. Our doors have an access control system which utilizes *key fobs*. *Key fobs* have unique RFID transmitters in them – allowing us to program access by door for each employee (or “Agent”) depending on the role, to ensure that only key people have access to our secure areas.

As per our record keeping SOP, a detailed log will be kept off all agents' current and prior access permissions.

Storage

Marijuana Storage

Per our floor plans, we will construct a secure access vault room in our dispensary to store all marijuana inventory that is not on the sales floor. All inventory that is available for sale will be stored behind the dispensary counter in locked cabinets that are only accessible to our employees.

This vault room will have reinforced walls, a heavy steel door, motion sensors, a panic button, video surveillance, and door contact alarm.

All finished marijuana, marijuana concentrates, and marijuana infused products will be stored inside our vault room at all times during non-operational hours. All of our marijuana waste is stored in our secure vault room in a locked, labeled, separated container until proper disposal occurs.

Cash Management

Banking

Tree Tips 3 already has been vetted, and in complete transparency, has opened an account with a local credit union that understands and is comfortable with our business. We can deposit cash, accept debit cards, and pay vendors from opening day.

Dispensary Cash Management Procedures

All cash is kept in a combination safe, located inside our secured access vault room, bolted to the floor. Only managers responsible for handling cash, have the combination to our cash safe. Moreover, we have an on-site maximum cash storage protocol, and cash deposit trips to our credit union in order to keep the amount of cash stored on hand in our safe to a minimum. These trips will be made by a third party, bonded, armed cash transportation service provider.

Staffing and Training

At Tree Tips 3, we care about building a culture of safety and accountability. Especially in the case of internal diversion prevention, it is critical that our staff are well trained at monitoring and reporting any suspicious activity that may be taking place. We believe that creating a workplace culture of safety and responsibility is essential to avoiding security breaches. Our safety and security training will include at a minimum:

1. Incident response procedures, including how to responded to 'safe mode' and fire alarms

2. Emergency procedures, such as attempted robbery, active shooter, and natural disaster
3. Suspicious activity reporting protocols – ALWAYS report suspicious activity to the Dispensary Manager or the Operations Manager.
4. Proper end of day 'lock down' procedures including securing inventory in vault room, arming all systems and ensuring all exterior doors.
5. Proper use of panic alarm buttons that are placed behind the sales counter, in the vault, and in the identification verification room.
6. Immediate notification to management if a badge or key fob is lost or stolen

Verification of Customers and Access Granting

No unauthorized persons under the age of 21 are permitted inside our dispensary; we follow the following multi-step verification and screening process before granting access to the dispensary floor and being permitted to make a purchase:

1. Customers check in with our security agent outside the dispensary entrance. They will be asked to present their form of picture identification. Our security agent will verify their picture ID before opening the door to let them inside the dispensary.
2. Once inside, customers will present their ID a second time to our receptionist. Our trained receptionist will scan their ID, using an identification verification scanner (Model # IDScience 5000/9000), to ensure legitimacy.
3. After being positively authorized, customers will be permitted to enter the dispensing area. At the sales counter, the customer will present their ID a third time for verification prior to making a purchase.

Authorized Entrance of Contractors/Visitors

No unauthorized persons are permitted inside our facility – all visitors, such as contractors, must notify the Dispensary Manager or Operations Manager at least 24 hours before they plan to enter the facility to be listed as an expected, approved, visitor. All approved visitors will:

1. Have their IDs verified when they are allowed entrance into the dispensary
2. Will be provided a visitor badge, and will be logged on a visitor log
3. Will be escorted at all times by a COMPANY employee
4. Will not be allowed to touch marijuana or marijuana products

Diversion Prevention

With management's prior experience operating dispensaries, Tree Tips 3 is uniquely to instill proper standard operating procedures to mitigate the risk of diversion being able to occur.

Pre-Employment Agent Screening

Our detailed personnel policies include a comprehensive screening process that all prospective agents will have to pass. All agents must pass a background check performed by the State of Maine and have a State issued cannabis agent identification card.

Inventory Control and Monitoring

The most effective way to limit the risk of employee diversion is through a robust inventory control system (ICS). We use Leaf Logix software. Our ICS will track and account for all marijuana, all finished marijuana, all marijuana concentrate, and all marijuana waste, at all times. This technology allows our Managers to perform daily reconciliations that would immediately identify discrepancies that could be caused by diversion. This system integrates with the State level METRC tracking system.

Furthermore, at all our facilities, we perform monthly physical inventory reconciliations, to ensure that our electronic system tracking perfectly matches our physical inventory count.

External Diversion

We acknowledge that external diversion is an additional risk, that we mitigate by implementing the following procedures:

1. Reminding all customers whom purchase marijuana that diversion is a serious criminal offense
2. Monitoring the parking lot for suspicious activity
3. Tracking the purchase limits on all customers to ensure no one is surpassing their allowable purchasing limits
4. Agents are trained to immediately report any suspicious activity to their supervisor

Redundancies/Backup Systems

Our safety and security plan includes the following measures to ensure our systems as fully operational even in unexpected adverse circumstances:

1. All security equipment, exterior lighting, interior emergency lighting, security monitoring and recording system, and alarm systems will have **uninterrupted power supply (UPS)**

battery backup systems that provides a first layer of backup in the scenario where we lose grid power.

2. Our alarm monitoring systems can operate on a **cellular backup** if a telecommunications line goes down.

Contact Sharing

Contact information of our general manager will be shared with the Kittery police department. Our General Manager will be available as the “on call” individual 24/7 should the Town need to contact someone regarding our dispensary.

Conclusion

We are extremely confident that our robust security infrastructure and proven operating policies will both protect our dispensary and produce a net positive impact on the safety and security of our immediate neighborhood.

SECTION 2

Provisions to ensure against loitering and using marijuana and marijuana products on or near the premises

COMPANY is committed to ensuring that our dispensary is operated in compliance with all state and local laws and regulations, and more, generally, is not a nuisance to our neighbors. We will be training our staff to implement numerous procedures to ensure customers do not loiter or use marijuana / marijuana products on or near the premises, including, but not limited to the following:

1. Signage

Signage will be clearly visible in the parking lot indicating that both loitering, and the consumption of cannabis, is prohibited on or near the premises. We will also post signage near the exit of the dispensary that reinforces this message.

2. Customer Education

Our staff will be trained to remind our customers that they are not to loiter on site, and that similar to alcohol, their cannabis products should not be opened or consumed until they reach their place of residence.

3. Monitoring

Our security team will actively monitor the premises and parking lot to ensure that customers are not loitering or using cannabis on site.

SECTION 3

Protocols for hiring and training employees

We plan to hire approximately eighteen (18) employees to operate our dispensary in Kittery. We will seek to prioritize a diverse, local workforce.

Hiring Protocol / Staffing Plan / Background Checks

We will be posting our job positions on a variety of online job sites (such as indeed.com, craigslist.org, LinkedIn, and monster.com).

We will be hiring for the following positions:

Title: Manager

of Hires: 1

Description of duties: This individual will be responsible for the day-to-day operations of the Kittery dispensary, overseeing all hiring, training, compliance, and operations.

Title: Operations Manager

of Hires: 1

Description of duties: Also known as the Assistant Manager, this individual is second in command and takes lead on staff scheduling amongst other duties.

Title: Supervisors

of Hires: 2

Description of duties: Supervisors take ownership of day-to-day operations, directly managing the cannabis consultants, reception, and safety team during business hours.

Title: Pre-Order Team members

of Hires: 2

Description of duties: Pre-Order Fulfillment is responsible for receiving online orders and accurately and compliantly packaging them for customer pickup.

Title: Inventory Team members

of Hires: 2

Description of duties: The inventory team is responsible for the accurate receiving of inventory and managing the flow of inventory from the vault through the retail store.

Title: Safety and Security Team members

of Hires: 2

Description of duties: The Safety and Security team is responsible for checking IDs of our customers, managing parking and traffic flow, and ensuring the safety and security of our customers and employees.

Title: Receptionist

of Hires: 2

Description of duties: The receptionist is responsible for controlling access into the dispensary, performing a secondary ID check, and answering incoming phone calls.

Title: Cannabis POS Staff

of Hires: 6

Description of duties: Cannabis POS Staff are responsible for directly interfacing with our customers, performing the sale transaction at the POS counter.

All employees must first have an "Individual Identification Card (IIC)" provided by the State of Maine's Office of Marijuana Policy prior to beginning employment. In order to obtain an IIC card, the State of Maine runs background checks on each individual.

Training of Staff

All employees must undergo at least two weeks of training, with management employees being required to have a minimum of four weeks. All employees receive at least 40 hours of ongoing training each year to keep up with new policies. All steps of the training process are documented and kept in file.

Details of our training protocol includes:

1. During training, agents will have received their IIC card, however they are not provided an RFID access key fob until training is complete. During training, the supervisor conducting the training provides access to the areas of the facility necessary for the new agent to train.
2. Specific training varies depending on the agent's job responsibilities, though all agents are trained on confidentiality, drug, alcohol, and tobacco policy, facility layout, safety / security, emergency procedures, and inventory control.
3. The supervising agent is responsible for designing and implementing the training process for each of his / her agents. Training will include both hands on training and 'classroom style' learning.
4. At the end of the training period, the supervising agent must sign off on the agent's employee record that they believe the agent is adequately trained and is ready to move forward with the job position. If at the end of the training period, the supervising agent does not feel that the new agent is ready to move forward, they may elect to provide additional training or to recommend to the Dispensary Manager that the agent be terminated.

SECTION 4

Experience and training in the State of Maine's seed-to-sale tracking system

Tree Tips 3 LLC's owner, Nick Friedman, has extensive experience working with METRC, the seed to sale tracking system used by the State of Maine from his involvement with operating dispensaries in both Maine and Massachusetts, all of which remain in good standing with METRC. Mr. Friedman will be the Master Administrator on the METRC account for Tree Tips 3, to ensure top-down competency in using the State's seed-to-sale tracking system. We are extremely confident that our deep experience already operating in the State of Maine's seed-to-sale tracking system METRC will create a safe, compliant dispensary operation in Kittery.

SECTION 5

Odor Mitigation Plan and Protocols for Waste

Tree Tips 3 LLC will be a retail only facility, with no cultivation or manufacturing activities on site. Management has experience operating other dispensaries in Maine and Massachusetts and a proven track record of ensuring that its operations do not pose a nuisance to its neighbors, particularly by ensuring that no odors of cannabis emanate from the dispensary and that waste is properly disposed of.

Odor Plan

Several approaches will be taken to ensure odor does not become a nuisance.

Cannabis Packaging

We will require that any cannabis and cannabis products to arrive at our facility, must be packaged in **airtight containers** prior to being transported to our dispensary. In our experience, when cannabis and cannabis products are properly packaged and sealed prior to arrival at a retail dispensary, there is no odor that is emitted from those packages.

Cannabis Storage

All cannabis and cannabis products will be stored in our vault room. During storage, all cannabis and cannabis products will remain in their airtight packaging. Moreover, we will install a carbon filtration air scrubber in this vault room to reduce the chance of any odor leaving that room.

Air Filtration / Carbon Scrubbing

In addition to the carbon scrubber located in the vault room, an additional carbon scrubber will be located in the dispensary floor.

I am confident, based on our past experience, and the plans detailed in this proposal, that our proposed operations in Kittery will not cause any issues with odor.

Waste Plan

Cannabis waste

We will dispose of any cannabis waste in full compliance with the regulations written and enforced by the Maine Office of Marijuana Policy. As a retail only location, we generate very little cannabis waste. Examples of waste would come from customer returns, product that appears defective, or product that has a broken tamper evident seal. Waste is tracked in METRC, the State of Maine's inventory control system. It is stored in our vault room until it is time for disposal. Prior to disposal, marijuana waste is rendered "inert" by mixing it with non-cannabis materials such as rock salt. From there, it is placed in a locked dumpster for disposal.

Non-cannabis waste

All non-cannabis waste will be sorted and placed appropriately in a locked dumpster. We will make best efforts to recycle as much material as possible, and will have a separate recyclable only dumpster on the premises.

SECTION 6

Protocols for ensuring the safety and security of product

We follow a variety of cannabis industry best practices to ensure the safety and security of our cannabis inventory. At all times we maintain full compliance with the State of Maine's extensive set of regulations governing product safety. Below are some of the measures we take to ensure safety and security of product.

Security & Storage Procedures

As further detailed above, our security system's operations is a core component to ensuring the safety and security of our product. Please see SECTION 1 for further details.

Inventory Control

METRC, the State of Maine's inventory control system, allows us to know the location and movement of all product at all times. By using this system, employees appreciate and understand that no loss of product would go unnoticed, which heavily discourages any theft or diversion from employees.

Inventory Audits

To further ensure the safety and security of our products, once per week, we randomly select three different batches of product to do a full manual inventory count. Additionally, on an annual basis, we perform a complete inventory audit where every single product is counted and compared to the amounts that are shown in the inventory control system.

Secure Delivery

Product deliveries occur in the rear of the building at random times throughout the week. We expect around 3 deliveries per week. All vendors used to procure inventory from are mandated to use unmarked, discreet delivery vehicles. We maintain correspondence with an incoming delivery vehicle and, prior to their arrival, we check all exterior cameras to ensure that the Premises are safe for arrival to occur. The vehicle arrives in the back of the building and is unloaded directly into our facility.

Employee Training

As further detailed in SECTION 3, we comprehensively train our team members on how to operate a safe, compliant facility, including:

1. Never leave keys in locks
2. Never let anyone into the building that is not authorized and never prop open doors
3. At the end of the day, move all product into the vault room
4. Always arm the alarm system prior to leaving the building at the close of business

SECTION 7

Fire Suppression annual certification

We take first code and building safety extremely seriously. Tree Tips 3 LLC attests that:

1. Our facility will be designed and constructed in accordance with all applicable building codes and regulations, including fire codes
2. The building itself will be protected by fire suppression measures and fire 402 alarms to the satisfaction of the Fire Chief and in accordance with all applicable building codes. In order to satisfy this requirement Tree Tips 3 LLC will meet with the Fire Chief and review our plans prior to beginning construction, and post construction, will the Fire Chief and his team to walk through the building prior to commencing operations.

3. Prior to operations we will obtain Certification from the Fire Chief that the location of the Marijuana Business on the subject Premises will not pose an undue risk of fire or other safety hazard. We have already initiated discussions with the Fire Chief.
4. On an annual basis, we will work with an outside vendor and the Fire Chief to inspect and certify our Fire Suppression System is in good working order.

This concludes our operations plan. Please note that we will have hundreds of pages of operating procedures in place prior to commencing operations that we will use to train our staff to operate a safe, compliant, and industry leading dispensary.

Thank you for your review and please do not hesitate to reach out directly with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Friedman', with a stylized, cursive script.

Nick Friedman
Tree Tips 3 LLC
413-429-6472
Nfriedman12188@gmail.com