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May 6, 2021

VIA HAND DELIVERY

Edward Ng, AICP
Planning & Zoning Manager
City of North Miami Beach
17050 NE 19th Avenue
North Miami Beach, FL 33162

**Re: Letter of Intent –
Application No. PZ21-8 by Cookies Florida, Inc. for Medical Marijuana Dispensary
Conditional Use Approval at 17150 Biscayne Boulevard (Folio: 07-2209-009-0042)**

Dear Mr. Ng:

On behalf of Cookies Florida, Inc. ("Applicant"), lessee at 17150 Biscayne Boulevard, North Miami Beach, FL 33160 (Folio: 07-2209-009-0042) ("Property"), we submit this application for Conditional Use approval for a medical marijuana dispensary at the Property ("Application").¹

I. APPLICANT PROFILE

Since launching in 2012 in California, Applicant's family of brands has established a presence in medical marijuana markets across the U.S. and internationally. Applicant is excited to begin offering high-quality cannabis medicine—powered by renowned proprietary genetics—to serve registered patients across Florida beginning in 2021. Applicant's long-standing reputation as a respected provider of innovative, high-quality cannabis products means it is well-positioned to provide excellent medicine for patients that make up Florida's rapidly growing medical use market.

¹ Because no substantial modifications are proposed to the approved plans for the Property, no Site Plan modification approval is required for this Application.

II. PROPERTY OVERVIEW / EXISTING CONDITIONS

The Property is owned by JAIA 172, LLC ("Owner"), and is located at the southwest corner of Biscayne boulevard and NE 172nd Street. The Property is currently zoned "B-2 General Business District," which is one of the few zoning districts in North Miami Beach that permits medical marijuana dispensaries. The Property is approximately 27,741 square feet, or 0.63 acres. The Property is currently vacant, but will soon be improved by Owner with a two-building retail strip with surface parking. Applicant is leasing – and intends to operate its dispensary at – the northern building to be constructed at the property ("Premises").

The Property abuts the FEC railway tracks to the west, an 8+ lane portion of Biscayne boulevard to the east, a 4+ lane portion of NE 172nd Street (which street also has an approximately 40'-wide large central median) to the north, and vacant land to the south. The Property is uniquely located within the previously undeveloped "median" area separating the FEC Railway from Biscayne Boulevard. Given the foregoing locational characteristics, the Property is well separated and buffered from other nearby uses. The nearest adjacent uses to the Property include retail strips across the FEC tracks and West Dixie Highway to the west, and the Marina Palms Complex across Biscayne Boulevard to the east (the residential portions of which are well beyond 500' away from the Property).

III. PROPOSED USE

Applicant proposes to build out a high-end, state-of-the-art medical marijuana dispensary (the "Dispensary") at the Property. The Dispensary will provide a safe, patient-centric customer experience, all in a discreet physical package. The Dispensary will be designed to minimize noise, maximize lighting and ventilation, and be visually appealing to patients, all while facilitating a seamless patient experience. Enclosed with this application are renderings of Applicant's typical interior dispensary buildout style and design. A description of Applicant's Operating Plan for the Dispensary is attached hereto as "Exhibit A". A description of Applicant's Odor Plan for the Dispensary is attached hereto as "Exhibit B".

The exterior of the Dispensary will remain consistent with the existing approved uniform condition of the Premises, but will contain additional security features as described below.

All medical marijuana dispensaries in Florida must implement certain specific security measures, as provided by state law. Security is a paramount concern for Applicant. As such, Applicant has developed a security and operational protocol that *exceeds* the aforementioned statutory requirements. Attached hereto as "Exhibit C" is Applicant's Security Plan for the Dispensary. Additional security details are provided in other application materials submitted with this Application. A quick summary of key security plan elements is as follows:

- i. ***Comprehensive Surveillance & Alarm Systems.*** Applicant will install and maintain a comprehensive 24/7 camera surveillance system, covering both the interior and exterior of the Dispensary, along with a silent alarm system with motion detectors, glass break sensors, pressure switches, and duress and panic alarms. The alarm system will also be monitored by an off-site third-party security vendor, and, when activated, will notify local law enforcement if a crime is taking place.
- ii. ***Customer Flow Protocol.*** Upon entering the Dispensary through the Premises' main entrance, patients and caregivers will be greeted at the reception desk by a customer care specialist, who will check Florida Department of Health records to verify the individual's status as qualified patient or caregiver and confirm that a prescription has been uploaded to the patient's record by a qualified doctor. Only individuals certified under Florida law with a qualifying state issued Medical Marijuana Card on their person will be able to enter the Dispensary. Only individuals certified under Florida law with a qualifying prescription will be able to enter into transactions within the Dispensary.
- iii. ***Point of Sale & Inventory Management.*** The facility will maintain an industry standard safe vault, which will be bolted to the ground and maintained in a secured, locked room for all medical marijuana inventory. No medical marijuana shall be present within the entry and waiting areas. The Dispensary will also maintain a statutorily required secure inventory management and point of sale system, which allows Applicant to track all medical marijuana products from seed to sale. Upon dispensing medication to a patient, Applicant records sales data (including the specific product dispensed) in a secure, HIPAA compliant electronic patient file within the sales system; and
- iv. ***Professional Staff.*** All Dispensary staff will wear identification badges and will be trained to immediately notify local law enforcement if they observe suspicious activity and/or emergency events. All staff will also be trained on how to assist patients and handle emergency events.

IV. CONSISTENCY WITH CONDITIONAL USE CRITERIA

The Application is consistent with City Code Section 24-175(B) Conditional Use Review Standards, for reasons including but not limited to the following:

- (1) **The proposed use will be compatible with the existing natural environment and other properties within the neighborhood;**

The Property abuts the FEC railway tracks to the west, an 8+ lane portion of Biscayne boulevard to the east, a 4+ lane portion of NE 172nd Street (which street also has an approximately 40'-wide large central median) to the north, and vacant land to the south. The Property is uniquely located within the previously undeveloped "median" separating the FEC Railway from Biscayne Boulevard. Given the foregoing locational characteristics, the Property is well separated and buffered from other nearby uses. The nearest adjacent uses to the Property include retail strips across the FEC tracks and West Dixie Highway to the west, and the Marina Palms Complex across Biscayne Boulevard to the east (the residential portions of which are well beyond 500' away from the Property). Notably, Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations, and the surrounding neighborhood and environment.

(2) The proposed use will create no substantial detrimental effects on neighborhood property values;

Under Florida law, and in practice, the proposed use is akin to a pharmacy use. The proposed use is consistent with surrounding uses in the immediate neighborhood, which is mostly commercial or vacant. As such, the proposed use is not expected to have any detrimental effects on property values. On the contrary, the application proposes to bring commerce and medical availability to an otherwise vacant space; and as such, the proposed use is anticipated to have a *positive* effect on neighborhood property values. Notably, Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations, and compatibility with the surrounding neighborhood.

(3) The proposed use can be accommodated by adequate community facilities such as schools, streets, parks, and utilities;

There are no concurrency concerns anticipated in relation to the Proposed Use. The Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations, and the surrounding neighborhood and environment. Applicant is submitting an updated Traffic Study with this Application to reflect the Proposed Use.

(4) The proposed use will have adequate provisions for vehicular and pedestrian traffic movement, both internal to the use and in the area which will serve the use;

There are no traffic concerns anticipated in relation to the Proposed Use. The Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations. Applicant is submitting an updated Traffic Study with this Application to reflect the Proposed Use.

(5) The proposed use will have adequate drainage systems to service the use with particular attention to the necessity for on-site retention systems to alleviate runoff and pollution problems;

There are no drainage concerns anticipated in relation to the Proposed Use. The Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations.

(6) The proposed use will have adequate setbacks, buffering, and general amenities in order to control any adverse effects of noise, light, dust, and other nuisances;

No nuisances are anticipated to be created by the Proposed Use. The Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations. All medical marijuana products dispensed at this location are in sealed packages and cannot be consumed on premises.

(7) The proposed use will be located on property which is sufficient, appropriate and adequate for any reasonably anticipated expansion thereof;

The Proposed Use will be part of a brand-new two-building retail strip with surface parking that has been rigorously reviewed by City Staff to ensure compliance with all City regulations. The Property and building/Premises will not be expanded under the proposed use, nor is it anticipated that the proposed use will require any such expansion in the future.

(8) Any other conditions as may be stipulated and made a requirement in granting any conditional uses, when it is considered necessary to further the intent and general welfare, including, but not limited to: (a) Limitations on the hours of commercial or industrial operations; (b) Limitations on the number of occupants of any building at any one time.

The proposed use is heavily regulated by the Florida statutes, which already limits the hours of operations and requires compliance with Florida building code, which will dictate the limitations on the number of occupants in the Property at any one time.

(9) Medical marijuana dispensary/medical marijuana treatment centers. No medical marijuana dispensaries/medical marijuana treatment centers shall be located within five hundred (500') feet of the real property that compromise a public or private elementary school, middle school, or secondary school.

As per the City's distance separation map, as well as our own distance separation survey submitted with this application, the Property is not within 500' feet of any public or private elementary, middle, or secondary school.

V. CONCLUSION

The Property and Premises are ideal for a medical marijuana dispensary, consistent with the explicit requirements, as well as the intent, of the City of North Miami Beach's Code of Ordinances. Specifically, the Property is zoned for a medical marijuana dispensary use, is surrounded almost entirely by commercial uses and vacant land or "natural" buffers, and exceeds all distance separation requirements from schools and other potentially sensitive uses. Furthermore, the Property is appropriately buffered and Premises is readily securable. Most importantly, the Dispensary would provide residents of the City of North Miami Beach with convenient and discreet access to an important medicinal product.

For the foregoing reasons, Applicant requests the favorable review of its application. Please contact us should you have any questions. Thank you for your consideration.

Sincerely,



Ian G. Bacheikov, Esq.

Enclosures

cc: Mario Duran, Jr., AICP, *Associate Planner*
Ana Parada, CFM, *Associate Planner*
Wesley Hevia, Esq.

"EXHIBIT A"



Cookies North Miami Beach - Operating Plan
17150 Biscayne Blvd, North Miami Beach, FL 33160

Cookies primary goal is to assist our patients in obtaining relief from their debilitating qualifying conditions. We believe in patient-focused decision making in everything we do; from the products we offer to the way we reach the market and the community. In order to ensure our successes, we will be committed to first-class customer service, the highest quality products, facilitating the progress of applied research, maintaining compliance, and effectively capturing the existing and future market share, while also generating a positive image and impact for the community. This is carried out through strict protocol, high quality training, and constantly improved operating procedures. Quality patient service, competitive pricing, sound business practices, a safe environment and attention to detail shall always be top priority for the company, its employees, and customers.

Our operational policy and procedures are among the most in-depth in the industry, and are designed to promote successful, compliant business with top-tier quality assurance, and a focus on positive patient experience and treatment. In addition to the experience in ownership, we intend to utilize on-site pharmacist-oriented training from pharmacists and technicians that have first-hand experience dispensing medical marijuana and maximizing its benefit to patients.

Staffing

Cookies approaches operations with a whole community perspective in how it operates internally as a company and externally in the communities it serves. Understanding the complexities of regulations, compliance, and procedures, is paramount to Cookies success. The execution of this in any location is dependent upon Cookies staff and leadership. Cookies will implement an open education platform that includes cross-training staff in areas of compliance and operations not limited to their job titles. This will empower staff with a base of knowledge in all areas of operations. For example, reception staff will be trained in cannabis products and local regulations to help inform customers before they enter the salesroom, and sales staff will be trained in basic back of house operations (e.g., intake, inventory, storage) so they can spot any irregularities. All these varied efforts culminate in a culture of compliance in Cookies operations.

Cookies knows from experience that the best way to retain a dedicated staff and foster a happy and motivated work environment is to generously compensate its employees while affording them the opportunity to live a fulfilling life outside of work. As in its other locations, Cookies intends to be a role model for employers in the City of North Miami, showing that



cannabis businesses can make meaningful contributions to the community through labor and employment practices. As set forth in more detail below, Cookie's will pay its employees a living wage and will provide multiple opportunities to develop new skills through employee training, formal education, and a mentoring program. Cookie's will provide its workers with a safe and healthy workplace where employees can be productive. Cookie's has signed a labor peace agreement with the United Food and Commercial Workers Union and earned a letter of support.

Cookies also believes in pay equity. Every worker will receive equal pay for equal work regardless of their gender, race, religion, national origin, age, or physical and mental ability. Cookie's will regularly review wages and salaries to ensure that employee compensation remains fair. Cookies believes that cannabis can be a platform for empowering others. Our goal is to provide skills to our workers so they can achieve their personal goals. Cookies provides skills training to employees through training, mentoring, and education opportunities. In addition, Cookies promotes from within whenever possible. Cookies program supports development of the employee so they can do work that is positive and meaningful.

The level of staff will be proportional to the level of activity and business needs for the medical marijuana treatment center dispensing facility located at 17150 Biscayne Blvd, North Miami Beach, FL 33160 (the "Facility").

Our company will hire qualified talent for its 3 departments:

1. Patient Liaisons/Counselors
2. Dispensing Operations Staff Administrative,
3. Security and Management

Our company could hire over 10-12 Full Time Equivalent ("FTE") employees within its first 12 months of operations across 3 departments and 15-20 FTE employees by Year 3 of activity, depending on the success of the market. The first phase of hiring would include the administrative and management team that will oversee the Facility's initial opening, followed by an operating team. All staff members will be registered employees, paid every other week through a specific payroll system and will have access to employee benefits. Our company will also pay all usual taxes, and worker's compensation as well. More benefits will be added and then offered to the employees in the future as they become available.

The staffing assumptions are based on a 35-day hiring process, including a detailed online application, phone and face-to-face interviews and federal, state and local background checks. Cookie's will submit the necessary background check and Business Tax Receipt applications for each employee of the Facility.

Dispensing Operations: (not including C level staff) 5-7 employees will be hired during phase 1; 7-10 employees will be hired through phase 2 and 3; and 3-5 contractors for service, security etc. will be employed as well.



Expected Staffing Schedules:

Position	Month Hired	Base Salary/Hourly	Annual	Number of Employees in Position	Total
GM	2 months prior	\$ 88,000		1	\$ 88,000
Co Managers	6 weeks prior	\$ 60,000		4	\$ 240,000
Leads	4 weeks prior	\$ 19.00	\$39,520	3	\$ 118,560
FT Budtenders	2 weeks prior	\$ 16.00	\$33,280	9	\$ 299,520
PT Budtenders	2 weeks prior	\$ 16.00	\$16,640	12	\$ 199,680
FT Inventory associates	2 weeks prior	\$ 16.00	\$33,280	5	\$ 166,400
PT Inventory associates	2 weeks prior	\$ 16.00	\$16,640	8	\$ 133,120
					\$ 1,245,280

Employee Training

Corporate Level Operational Oversight and Development Team

Cookies employee training is vital to the company's success. Cookies prioritizes regulatory compliance and customer service in all aspect of its operations. Cookies has tailored its training to provide employees with the skills to succeed. Employees will know how to operate in compliance with regulations and to provide customers with a memorable shopping experience. Currently, Cookies employee training involves both virtual and in-person trainings, including five days of on-site, Cookies specific training and onboarding upon store opening. Owner and Director of Education Dr. Matthew Jason Kurtz, a physician, will ensure all employee training is scientifically accurate.

Medical Director

Dr. Jason Kurtz is a respected physician, business owner, and primary care provider who has been serving the people of Southern California for over ten years. He has been a board-certified internal medicine physician since 2008 and has seen first-hand the benefits regulated cannabis provides both as a tool for doctors and a treatment for patients. In residency at the Pacific Hospital of Long Beach, Dr. Kurtz witnessed the ability of medical cannabis to reduce a patient's need for opiates and has since educated himself on the broad range of pharmacological benefits cannabis provides. While acknowledging that there are potential negative side effects to cannabis use (though generally less than those of prescribed medications), Dr. Kurtz maintains that it can be of tremendous benefit to people with cancer, chronic pain, or inflammatory conditions. At his medical practice he is investigating clinical trials to expand the scientific knowledge related to cannabis use. Dr. Kurtz will be responsible for developing Applicant's community education and employee education programs. Dr. Kurtz will be available at community seminars to inform the public about the effects of cannabis use, dosage, pharmacological benefits, and the emerging scientific discoveries related to cannabis and cannabinoids.

Policies and Procedures

The purpose of the oversight of the Dispensing Facility is to ensure that:

- There is a proper reporting and management structure.



- The supply of medical marijuana products to patients in need remains uninterrupted.
- The Company's medical cannabis marijuana are safe and effective for patient use.
- The Company 's medical cannabis marijuana are not diverted to criminal enterprise.

In order to meet these objectives, Cookie's has established a set of policies, procedures, and strategies based on its significant experience in the cannabis industry. As Cookies commences operations, the operational plan will undergo continuous evaluation and revision; these revisions will incorporate the experience and best practices of Cookie's and its affiliates nationwide.

Management and Reporting Structure

As an affiliate of a multi-state operator, Cookies has access to accumulated resources that standalone businesses may not. This expertise covers every aspect of the supply chain, from dispensing to research, growing and harvesting to processing and extraction, to sales, marketing, and security. This will allow Cookie's not only to build a first-class operating team, but also to quickly fill any position in case of loss of personnel. This is crucial to the continuity of Cookies, as it will not be forced to rely on the expertise of any single key individual. Furthermore, as Cookies grows, it will have access to the necessary expertise to efficiently manage its expansion without any interruptions in operations.

Cookies will also have access to the large library of Standard Operating Procedures ("SOPs") held by its affiliated multi-state operator. These SOPs cover every aspect of the operation, and so anticipate many of the potential issues involved. By strictly adhering to these well-developed procedures, Cookies can avoid many issues often encountered by less- experienced operators. These procedures also instruct personnel in responding to a wide range of incidents and emergencies, with the goal of preserving life, security of product, and operational integrity. These instructed responses will help Cookies minimize impact and rapidly restore operations in the event of a disruption.

Training classes and document review will be scheduled during orientation, as well as on an annual basis for all employees, including:

- A sign-in sheet will be utilized to record the attendance of employees at training.
- Comprehension testing will be done on all training sessions and a copy of the test results maintained in the employee-training file.
- New employees who are unable to demonstrate competency at the completion of orientation or training will be assigned additional training activities to address deficiencies.
- The length of the retraining period will be designed around the individual needs of the new employee. Re-evaluation will be conducted at the completion of the retraining period. Education will be conducted on various topics. These topics will include:



- Professional Conduct and Ethics;
- Employee Handbook/Policies;
- Patient Confidentiality;
- HIPAA Guidelines for Privacy and Security;
- Medical Use of Cannabis;
- Safety and Security Measures; and
- Compliance with Florida Law and Regulations.

Consumer Education and Community Outreach

All medical marijuana products stored and dispensed in the Facility will be packaged and labeled in accordance with applicable state law, including the provision of a patient package insert detailing:

- Clinical pharmacology;
- Indications and use;
- Dosage and administration;
- Dosage forms and strengths;
- Contraindications;
- Warnings and precautions; and
- Adverse reactions.

Being from the community, Cookies prioritizes the community in all its operations. Cookies launched the first social equity retail cannabis business in San Francisco, Berner's on Haight. From partnering with locals and hiring locally, to working with nonprofits for community improvement, to integrating with a city as much as possible so that the cannabis industry is normalized as safe, respected, and stable—Cookies' authentic commitment to providing people with quality products, from streetwear to cannabis, remains strong.

The Facility will strive to be an educational information source for the North Miami medical marijuana community by providing relevant informational material regarding medical marijuana news, research, policies, or derivative products in all marketing and communications in person, in print, and online. The Medical Director will develop and/or assemble a full complement of educational programs for patients and physicians alike. This educational information will be used to populate Cookies informational material with relevant educational content regarding medical marijuana and its applications.

Anna Mendoza - Director of Social Equity and Community Affairs

Anna Mendoza has over two decades of experience as a real estate professional managing community outreach, employees, and assets exceeding \$90 million throughout California. In her current role as Director of Social Equity and Community Affairs, Mendoza has evidenced this commitment by addressing the concerns of the communities in which Cookies operates while simultaneously exploring ways to enhance the lives of residents



and employees through community service, education, and self-sufficiency programs. She is a reliable point of contact for community members and is familiar with the best ways to maintain community relationships. Working with nonprofits and local governments, she has researched and developed volunteer programs in which Cookies employees participate. As a board member of Families Forward, a nonprofit dedicated to supporting the empowerment of homeless and at-risk families, Mendoza understands the importance of corporate partnerships to support and finance beneficent missions. As Director of Social Equity, Mendoza will maintain a constant and consistent line of communication with the North Miami Beach community—citizens, leaders, and nonprofit organizations—because she knows from experience that it works to strengthen the sense of purpose in day-to-day business operations. Mendoza will establish a community service program for the cannabis industry in North Miami Beach, she will set up a system for direct communication between Cookies and the community (both in person and digital), and she will encourage members of the community to be a part of Cookies' volunteer events.

Policies Demonstrating Compliance with State and Local Laws

Record Keeping and Patient Privacy

All records pertaining to Cookie's authorized dispensing operations, including inventory records, will be stored and maintained both digitally by use of proprietary equipment (DVR recorders; inventory/patient tracking software, etc.), and hard drive and cloud based platforms, backed up on a daily basis, as well as physically printed and filed as applicable, stored within the 'records archive' of our facility, and stored in both formats as applicable by a third-party record retention company. Cookies will ensure that all patient information remains confidential.

Inventory

All information concerning the dispensing and distribution of medical marijuana products will be perpetually monitored, recorded, and stored. Cookies will utilize physical written logs to conduct inventory as well as digital tracking/control interfaces to ensure that our inventory control system is accurate and compliant. Cookies will utilize Department of Health approved seed-to-sale software system to track all inventory. Additionally, this software will allow Cookies to quickly and effectively conduct product recalls, if necessary.

Security/Incident Reporting

The security mission of Cookies Retail is to dispense cannabis and cannabis products with the highest standards for quality of product, service, and public safety. Working with industry leading licensed security firms, Cookies ensures that every aspect of operations has a strong emphasis on security and preventing the diversion of cannabis. Cookies is committed to its mission of working



collaboratively with fellow cannabis business owners and local city officials in creating and improving cannabis security programs. Cookies positions itself as an industry leader by working with the cannabis community to further improve security and safety policies and procedures as well as serves as a model for other cannabis businesses.

To ensure a safe, clean, and welcoming environment, Cookies will implement standard procedures for opening and closing the dispensary each day. Cookies understands that security risks are heightened during opening and closing times, when both customer traffic and the presence of dispensary personnel are lowest. To mitigate security risks, improve efficiency and consistency, and minimize mistakes in opening and closing the dispensary, dispensary personnel utilize standard opening and closing checklists. Cookies will ensure at least two employees (including one Manager) and at least one security guard are present to open and close the facility so that the facility is adequately monitored and protected while opening and closing procedures are performed. The security guard, management, and any other personnel will arrive at least one hour prior to opening.

Cookies will alert the proper authorities of any of the following, and maintain a written report, to include the details of the incident, the responder, action, and person filing the report:

- A breach of security;
- Failures of, or tampering with, security and surveillance equipment, cameras, or recordings;
- Power failures lasting longer than two hours;
- Embezzlement or fraud;
- Any incident of suspected diversion;
- Contacting 911 or contact with law enforcement; and
- Incidents that occur while transporting marijuana, usable marijuana, and medical marijuana waste.

Surveillance Records

Cookies will have a robust security program in place with twenty-four hour store monitoring. All surveillance footage shall be stored offsite through third party hosting. Twenty-four hour recordings from all video cameras are to be:

- Available for viewing by the Department of Health and, if requested, local law enforcement through a secure internet connection;
- Retained for a period of at least forty-five calendar days;
- Maintained free of alteration or corruption; and
- Retained longer if our Facility is given notice of a pending criminal, civil, or administrative investigation, or other legal proceeding for which the recording may contain relevant information.

Waste Handling and Disposal Procedures



Cookies follows a variety of waste management procedures when handling and disposing of marijuana and non-marijuana waste stored and handled at the Facility to ensure clean, effective methods that account for the safety of the team and surrounding community. Procedures are as follows:

Marijuana waste (that has not been designated as hazardous) will be removed from its packaging, rendered unusable by incorporating it with other ground materials so the volume of the resulting mixture is less than 50% medical marijuana waste, and stored separately from non-marijuana waste before being delivered to a permitted and state-approved solid waste facility for final disposition. Depending on if the medical marijuana waste is compostable or non-compostable, the waste will be incorporated with either compostable mix waste or non-compostable mix waste as applicable.

All medical marijuana waste generated during dispensing will be evaluated against the applicable hazardous waste regulations to determine if the medical marijuana waste is designated as hazardous waste. If yes, the medical marijuana waste will be handled and disposed of in accordance with applicable guidelines. An approved locking hazardous waste container will be utilized as necessary.

Non-cannabis waste such as disposable gloves from handling raw cannabis material, packaging material that is broken down and cannot be recycled, general trash, and more. This waste will be stored separately from medical marijuana waste before being picked up by the contracted waste hauler.

The Inventory Manager will conduct daily inventory reconciliation documenting and balancing cannabis inventory to confirm that the State's Track-and-Trace system matches Applicant's point-of-sale system and the amount of physical product at Applicant's facility. Reconciliations will be conducted "continuously" so that the entire inventory is reconciled weekly. The Inventory Manager will retrieve the ordered cannabis goods from storage and provide them to the Sales Associate, who will visually inspect each good, ensuring that: (i) the good is not expired; (ii) the packaging is intact and unopened; and (iii) the labeling is intact and legible.

Secure Waste Storage Procedures

Cookies will follow these procedures to secure and limit access to the waste storage areas and waste receptacles:

- Facility waste will be stored in secured waste receptacles throughout the Facility, which are not accessible to the general public, patients, or caregivers.
- At the end of each day or when the waste receptacles become full, the contents will



be transferred to locking dumpsters in accordance with their waste type (compostable, non-compostable, recyclable, etc.), and in compliance with all Facility transfer and inventory reporting procedures.

- Waste will be stored in the locking dumpsters until it can be picked up by the contracted waste hauler and disposed of in accordance with all applicable rules and regulations.

Acknowledged and approved:



By: _____

Name: Brandon Johnson

Title: President - Cookies Retail, LLC



"EXHIBIT B"



Cookies North Miami - Odor Mitigation Plan 17150

Biscayne Blvd, North Miami Beach, FL 33160

Air Treatment and Odor Elimination Systems

Cookies Inc. has cultivation and production facilities where medical marijuana is grown, and medical marijuana products are processed in accordance with state law. Therefore, no medical marijuana will be grown or processed at our North Miami Beach medical marijuana treatment center dispensing facility located at 17150 Biscayne Blvd, North Miami Beach, FL 33160 (the "Facility"). Thus, the odor generated by our operations in the Facility will be minimal. Nonetheless, the Facility will use a combination of odor control methods to "scrub" the air free of odor particulates in a way that is natural and does not produce harmful byproducts, along with packaging and storage systems and overall facility design to ensure the maximum elimination and reduction of on-site and off-site odors.

- **'Activated Carbon' Air Filters-** Rooms containing marijuana and marijuana products shall be maintained at a negative pressure as in-line fans will be situated to pull air out of such rooms. As such air is being pulled out, "make-up" air from the outside will be filtered through an appropriate High Efficiency Particulate Absorption filter and heated or cooled as necessary to maintain a comfortable working environment. High-powered, inline exhaust fans will suction air through porous activated carbon (also called "activated charcoal") filters that molecularly absorb volatile chemicals, including the Terpenes, Terpenoids and Thiols that give marijuana its distinctive odor, rendering the scent effectively neutralized. These filters will be used throughout the Facility, with the "scrubbed" air being re-circulated into the Facility, and / or if desired, exhausted directly via exterior ventilation access points vertically through/above the roof in an area as far as possible from any nearby structures or points of ingress/ egress.
- Active Carbon Filtration is commonly employed by Marijuana producers/growers/dispensaries, as it has been shown as extremely effective in eliminating Marijuana Cannabinoid, Terpene, and other associated odor elements while maintaining a natural, safe, effective solution.



- High volume, In-line fans can easily produce these metrics, while consuming only a few square feet, operating on a patterned method to save energy.
- **Polarized-Media Electronic Air Cleaners-** These cleaners **will** create a polarized electric field using direct current that will polarize the air particles which pass through it, causing them to adhere to a disposable fiber pad. This technology is non-ionizing and does not generate ozone. These cleaners will be used throughout the Facility as they are mobile/ movable in nature.
- **Freestanding HEPA filtration modules-** These modules will also be employed to help eliminate associated medical marijuana product odors, and to improve the overall air quality, reduce any negative travel associated health impact, and lower the risk of airborne germ / virus / allergen transference. These too will be used throughout the Facility as they are mobile/ movable in nature.
- **Essential Oils-** (i.e., ONA Gel)- Essential oils **will** be strategically dispersed to neutralize odors by evaporating into the air as Terpenes and Terpenoids, without leaving residue behind, and physically reacting with odorant Hydrocarbons to form new scent free compounds. The gel is organic and comprised solely of compounds that occur in nature. It is environment friendly and has been found by the EPA to be non-toxic in conventional amounts. The Material Safety Data Sheets for this substance will be clearly and conspicuously posted and available to employees, patients and primary caregivers.
- **Air-Tight Packaging and Storage Containers-** To ensure the shelf life, odor control, and overall quality of all medical marijuana products, we will employ sealable air-tight containers for all (pre-packaged by the producer, and having passed quality assurance, intake, manifest, and packaging inspection) products received from producers and placed in secure storage. These containers are to be made from non-toxic materials, unaffected by heat/cold, and are to be sanitized upon each use. Furthermore, all products to be carried out of the Facility by qualified registered patients **will** be sealed in compliant, air- tight packaging, in addition to the approved producer packaging, and placed within compliant exit packaging.
- **Facility Design-** Our Facility will be designed in such a manner that the primary exterior entry/exit points will be segregated from the interior space of the Facility by another sealed entry/exit door; and each area within the Facility is segregated and independent. While this system is primarily a security feature, it prevents substantial air volume from transferring within the Facility or escaping through ingress/egress points. Additionally, ventilation and climate control systems are designed to contain and recirculate filtered and fresh air throughout the facility while not allowing un-filtered air to escape. The Facility design also includes:



- An exhaust air filtration system with odor control that prevents internal odors from being emitted externally.
- An air system that creates negative air pressure between the Facility's interior and exterior so that the odors generated inside the Facility are not detectable on the outside of the Facility.

Summary

Cookies goal is to keep cannabis odors undetectable. Cookies will manage odors proactively in multiple ways. Cookies Odor Management Plan is set forth in more detail below. First, Cookies will utilize carbon filters to neutralize cannabis odors. Carbon filters are industry standard and scrub cannabis odors from the air. Second, Cookies odor control system utilizes negative pressure to draw clean air into the cannabis facility. Third, Cookies will only sell prepackaged goods. Cannabis-odor-producing activities (cultivation, packaging, and consumption) will be prohibited on site. Finally, Cookies will monitor the environment for the presence of cannabis odor. Security will patrol the North Miami Beach location, as well as the surrounding block, and report to management if cannabis is detectable outside the retail premises.

Acknowledged and approved:



By: _____

Name: Brandon Johnson

Title: President – Cookies Retail, LLC



"EXHIBIT C"



Cookies North Miami Beach - General Security Plan
17150 Biscayne Blvd, North Miami Beach, FL 33160

Cookies medical marijuana treatment center dispensing facility will be located at 17150 Biscayne Blvd, North Miami Beach, FL 33160 (the "Facility"). The Facility has the following security plan and operates in accordance with Section 381.986 of the Florida Statutes. The security plan adopted by Cookies surpasses the requirements governed by state law.

To ensure the safety and security of the Facility where storing and dispensing of medical marijuana occurs, and to maintain adequate controls against the diversion, theft, and loss of medical marijuana or medical marijuana delivery devices, the Facility will:

- Implement security features including steel security doors, a top of the line video surveillance system, advanced alarm systems, a top of the line fire safety system, natural disaster security, compliant packaging and labeling of dispensed products, procedures for secure waste storage and removal, and other measures, such as the use of hurricane impact windows. Security systems will remain operable even in the case of a natural disaster, such as a hurricane or flood.
- Maintain a fully operational silent security alarm system that secures all entry points and perimeter windows and is also equipped with motion detectors, glass break sensors, pressure switches, duress, panic, and hold-up alarms. The alarms are reasonably designed to ensure the safety of persons and to protect the Facility from theft and or criminal acts in the Facility and in the surrounding walkways and parking area. The alarm system, when activated, will notify law enforcement that a crime is taking place. The alarm system is monitored by an off-site third-party vendor and is supplemented by on-site security professionals.
 - Maintain a video surveillance system that records continuously 24 hours a day and meets the following criteria:



- o Cameras are fixed in a place that allows for the clear identification of persons and activities in controlled areas of the premises. Controlled areas include storage rooms, disposal rooms or areas, and point-of-sale rooms (location of cash transactions).
 - o Cameras are fixed in entrances and exits to the Facility, which record from both indoor and outdoor, or ingress and egress, vantage points.
 - o Recorded images clearly and accurately display the time and date.
 - o Video surveillance recordings are maintained for at least 45 days or longer upon the request of a law enforcement agency.
 - o The Facility has installed a secured vault and/or cash drop box which is industry standard, bolted to the floor and is maintained in a secured, locked room. This room has alarm monitoring and is under video surveillance 24 hours a day, 7 days per week. This monitoring is also video recorded.
 - o The facility will have a physical barrier which will protect the medical marijuana treatment center employee from the general public, and to ensure that medical cannabis will NOT be accessible to any person under the influence of opioids or other narcotics. A barrier wall shall be installed around the area holding the medical cannabis products and any products sold at the store, from the general public.
 - o All medical cannabis products will be secured in a locked storage room, only accessible to Cookies employees.
- The Facility's exterior will have sufficient lighting from dusk until dawn. The lighting is reasonably designed to ensure the safety of persons and to protect the premises from theft, both in the premises and in the parking area.
 - The Facility's interior where dispensing of medical marijuana and medical marijuana products occurs includes a waiting area with sufficient space and seating to accommodate qualified patients and caregivers and has at least one private consultation area that is isolated from the waiting area and area where dispensing occurs. Cookie's will not display products or dispense medical marijuana or medical marijuana delivery devices in the waiting area.
 - No dispensing of medical marijuana or medical marijuana delivery devices from the Facility shall take place between the hours of 9 p.m. and 7 a.m.
 - All medical marijuana is stored in a secured, locked room or a vault.
 - Each employee must wear a photo identification badge at all times while on the premises.



- Cookies has implemented an alcohol and drug-free workplace policy.
- In the case of theft, diversion or loss of medical marijuana, a report to local law enforcement will be made within 24 hours. Additionally, the incident will be reported to the Department of Health's Office of Medical Marijuana Use.
- All unusual activity is documented in a logbook and maintained for review by company, state and local officials.
- Security officers will be at the Facility during the hours of operation to ensure the safety of employees and patients.
- If suspicious activity is observed by staff, local law enforcement is notified immediately.
- Security staff is trained on how to handle emergency events such as active shooter, robbery, medical emergency, fire, flood, and other events.
- Individuals must present their valid patient or caregiver identification to be permitted access to the Facility
- Person(s) observed loitering in the area will be requested to leave by on-site security. Refusal to cooperate, law enforcement will be notified, and appropriate action will be documented by security.

Facility Access for Other Visitors

The following additional protocols are followed for Facility visitors who are not qualifying patients or designated caregivers:

- All visitors to the facility MUST:
 - o Be pre-approved by the authorized Facility manager;
 - o Visit only when directed to by authorized Facility manager;
 - o Not bring any unspecified (upon scheduling) guests or passengers;
 - o Call the Facility to notify of their departure and ETA;
 - o Possess and present a valid, government issued ID;
 - o Sign-in to the visitor/personnel log accordingly; and
 - o Be escorted by staff at all times.

This protocol also applies to all federal, state, and local authorities, facility inspectors, etc.

- Service providers, contractors, or other vendors (including those servicing any shared building or roof, that were not hired and cleared) must also have the following information documented:
 - o Name of company and agent;
 - o Reason for visit/ Workorder;
 - o Vehicle type;



- o License plate#;
 - o Pictures of the vehicle and licenseplate;
 - o Time of arrival; and
 - o Phone#.
- No animals or pets are allowed on site, except registered service animals.

Restricted Access Areas

The Facility will maintain restricted areas to provide a product storage area exclusively accessible to employees/agents, regulatory officials, and law enforcement, as required, through the following:

- A protocol system of categorical identification and validation, allowing access to given areas only based on this system
- Physical features including remote and electronic access control, secure facility design, and security equipment
- Dedicated security agent presence, monitoring, and direct cooperation **with** law enforcement
- All employees have passed a level-2 background screening

Cookies utilizes a contactless-card with electronic access control technology that is integrated with our video surveillance system inside the Facility. Management issues electronically coded ID cards, with custom, unique access permissions, based on their role, which control and monitor access to all areas as applicable and restrict access to any area within the Facility to only the persons authorized for access (doors also have an override PIN and a key-lock system in event of emergency or card failure). All rooms containing medical marijuana and medical marijuana products will be controlled by a door that utilizes an electronic security card as well as a PIN as a redundant security measure.

Vault Access Protocols

All medical marijuana and medical marijuana products will be stored in a vault/secured storage cage until dispensed. The vault will be under 24-hour video surveillance.

The vault will remain locked at all times. The only time the vault will be unlocked is during the exact time required for authorized dispensary agents to access or store medical marijuana and medical marijuana products as specifically required by their role.

The designated secure storage area/vault will store all medical marijuana, usable medical marijuana, and medical marijuana waste products when they are not actively being dispensed, including destruction of contaminated product in accordance with all applicable rules and regulations.



The vault will be checked daily by security officers to ensure that all locks, storage, and security features are fully operational.

The 'quarantine' section of the vault will be used for storing items which are compromised, recalled, etc. while they are awaiting destruction/disposal or transport for further analysis and destruction/disposal.

Closing Procedures - Two Employee or Security Agent Requirement

- Once the Facility is shut down for the day, the Security Officer and at least one other employee or security agent will ensure that all systems are engaged for after-hours operations (i.e. alarms are set, appropriate lights are turned off, doors are secured, etc.).
- Before leaving the Facility, they will conduct a final interior walk-through to ensure that no one else is left in the building along with a final perimeter check via the video surveillance system.
- They will then collect all personal items, clock out, arm the security system, and exit the Facility.
- Upon exiting, they will ensure that each exterior door is completely shut and locked by pushing or pulling on the door.
- Finally, they will be vigilant for any suspicious persons or vehicles not known to be at the Facility.

Evacuation in case of emergency (fire, flood, etc.):

To assist all employees, members, and contractors, escape route maps will be posted in various work areas throughout the Facility. Each map indicates the routes to an exit.

Employees, patients, and visitors will evacuate the building by following the emergency evacuation route as indicated on the map. In the event the primary fire exit escape route is blocked or otherwise inaccessible, a secondary route of escape will be followed.

Acknowledged and approved:



By: _____

Name: Brandon Johnson

Title: President – Cookies Retail, LLC

