

CLAREMONT CAPITAL PARTNERS, LLC (CCP)

185 w Gale Ave, Coalinga Ca 93210

Outdoor Cultivation Business Plan

The proposed project is the addition of an outdoor cultivation operation in the back of the existing licensed cannabis manufacturing and distribution business located at 185 W Gale Ave in the City of Coalinga. The first area to be farmed is a little over six acres of outdoor cannabis canopy, and the use of existing ancillary buildings for restrooms and as drying sheds for the cannabis. Separate storage areas will be used for nutrients, and secure storage.

A composting area will be added so that we can make our own soil amendments out of the fan leaves of the plant material we would typically dispose of.

Prior to beginning cultivation, chain link metal boundary fencing with privacy screen will be used to protect the view-shed, and to keep the property in-line with the surrounding subject property.

The land will be prepared for outdoor farming by creating rows and proper irrigation before planting the seeds. Hoop house style shade coverings will be used when appropriate to help protect the plants from harmful weather conditions. This will also help regulate the temperature of the plants.

The plants will be watered and cared for with the schedule of nutrients and amendments. When the plants are ready for harvest, they will have their fan leaves removed while still in the ground. A few days later the plants will be cut down and moved into the buildings to be hung upside down to dry.

The plants will then be placed in large bins and moved through a licensed distribution company to a manufacturing facility. All activity will be recorded through the state's track and trace program called Metric.

Annual Harvests

We will aim to have 2-3 harvests per year.

Employees

We anticipate seasonal activity, not to exceed 10 employees at any given time.

The Flower Planting

We anticipate using enough seeds for around six acres (150 thousand seeds)

Days to seed emergence: 2-4

Days to maturity: 75 (summer) - 95 (winter)

Best time to plant:

- Fully outdoors: After last frost date -12 weeks before first frost date
- Can use remay when they are young to protect in an emergency but its not ideal
- Under hoops: 2 weeks before last frost date - 8 weeks before first frost date
- Can use remay when they are young to protect in an emergency but its not ideal

Transplanted - Recommended plants per:

- Acre - 15,000-20,000 plants
- 10,000 square feet - 3400 - 4600 plants

Direct Sow - Recommended plants per:

- Acre - 20,000-25,000 seeds
- 10,000 square feet - 4000 - 5000 seeds

Growing preferences:

C. Ruderalis prefers long, dry, and sunny days. During establishment, the plant requires regular watering to maintain even moisture and prevent the plants from drying out. Early applications of a balanced vegetative feeding program are critical to developing a well branched, large plant.

The goal is to create as many flowering sites as possible within 3-5 weeks of growth, at which point they will begin to show signs of flowering. At this time it is best to maintain a strong vegetative feeding program and begin to slowly introduce more phosphorus, potassium, and micronutrients to prepare for the plants reproductive (flowering) phase. The plants should continue to grow quickly and stack up flower sites from weeks 3-8. During Weeks 8-12 the flowering sites will bulk up and become dense, especially at the very end of the cycle. It is

important to let the plants finish and fully mature before harvesting to maximize the biomass yield and cannabinoid content of the crop.

Plants that grow during the summer when the days are long, warm, and sunny will ripen and be ready to harvest faster than in the winter where the shorter and colder days with less light can add an extra 10-20 days on the time to harvest. These plants have a strong appetite for light! The more light they receive, the faster they grow and come to maturity. True auto flowering plants can come to maturity even under a 24-hour daytime light cycle (no darkness/night).

Common plant spacing

- Field planted (spacing is based on center to center -> tractor wheel spacing)

- 1 row on a 30'' bed

- 12'' apart in row -> 17,424 plants per acre

- 16'' apart in a row -> 13,068 plants per acre

- 3 rows on a 60'' bed

- 12'' apart in row -> 26,136 plants per acre

- 18'' apart in row -> 17,424 plants per acre

- 2 rows on a 60'' bed

- 12'' apart in row -> 17,424 plants per acre

- 16'' apart in a row -> 13,068 plants per acre

- Raised Garden bed planted

- 18'' on center (staggard planting)

- On a 100' X 5' bed that would be ~222 plants

Water Use

We anticipate that our water use will be around 2-3 acre feet per acre, per harvest.

Our site qualifies as a Tier 2 Low Risk site by the STATE WATER RESOURCES CONTROL BOARD, our application was submitted. Cannabis General Order Application Number: 428772

Fee Payment Application Number: BA50428772

Waste Management Plan

See Attached

Pest Management Plan

See Attached

Quality Control/Cannabis Drying SOP's

1. Remove the fan leaves 1-2 days before harvesting your plants and before trimming
2. Hang dry the plants in a humidity-controlled environment for 5-7 Days, or until the plants and room homogenize to
an ambient level of 50 - 60% RH
3. Take your dried plants and remove the main branches from the stock

Shucking Instructions:

1. Next remove the flowers from the stem using the Debudder, it's best to individualize the stems as much as you can
2. It is crucial when shucking dried flowers that you shuck them at the proper moisture level to avoid any excess
breakdown of the colas, we recommend shucking between 50-60% RH
3. If you need to shuck and trim on the same day, and prior to curing, dry the plants to 40-50% RH, run the debudder on
a very slow speed and expect a small amount of breakdown to your top colas

Curing Instructions:

1. Place the shucked flowers into sealed containers for curing
 2. Sweat and burp them in a controlled environment until shucked flowers homogenize to roughly 40-50% RH
 3. Curing the flowers with the leaves on will improve your trim and concentrates, as well as homogenize the small flowers moisture level with the larger
 4. If shucking and trimming on the same day, be sure to still cure the product, post trimming, for at least 5-7 days
 5. Drying and curing to proper RH levels is the most important part of the harvesting process, and will ensure great smell and taste if done properly
 6. IT IS CRUCIAL THAT THE PRODUCT IS DRIED AND PREPPED PROPERLY PRIOR TO TRIMMING. THIS MEANS ALL OF THE FLOWERS HAVE BEEN INDIVIDUALIZED AND THE OUTER LEAVES BREAK OFF OR CRUMBLE WHEN DISTURBED
- The plants will then be placed in large plastic bins to be weighed and go through the inventory SOP's (please see inventory SOP attached).

Inventory Control

See SOP's Attached

Distribution

We will use a licensed Distribution company to move the dried plants in a distribution vehicle to a manufacturing facility to be processed. All product will be in the track and trace software called METRIC. Shipping manifests will be used to transfer from the cultivation operation to the manufacturer.

Employee Expectations & Security Training

In addition to obtaining the employee card, each successful employee shall undergo safety, security and cultivation training before beginning work.

As a part of the employee orientation process, and as an ongoing regimen, all employees will be provided with a copy of the Employee Handbook, the Security Plan, as well as security and safety training. Security and safety training shall consist of examination and discussion of the Security Plan, premises orientation, emergency training, and situational training. Situational training consists of instruction related to particular employees' job duties. For instance, the Cultivation Manager will have different day-to-day safety concerns than a Trimmer in the Facility.

Refresher training will be provided to each employee on a consistent basis and intermittently as necessary.

Initial employee safety and security training shall include:

1) Building orientation and access authority which shall include:

- a) The proper use of employee's access badge for entry into the premises and main building entrance;
- b) The proper use of employee's access badge for entry into employee's authorized access areas.
- c) The proper use of employee's employee card;
- d) Employee's authorized entry and exit points;
- e) Employee's locker; and
- f) Restroom and sink facilities.

2) Measures and controls for the prevention of diversion, theft or loss of cannabis which shall include:

- a) Necessity of keeping all facility doors locked and secure at all times

- b) Prohibited activities such as entrance into unauthorized access areas
- c) Awareness of video monitoring
- d) Metric training for the tracking of all product-related activities and information
- e) Requirement to report any unusual activity, security concern, or loitering

3, Procedures and instructions for responding to an emergency that will include:

- a) Accident prevention training
- b) How to respond to an emergency
- c) Emergency service provider location
- d) Emergency service contact information
- e) Emergency first aid kit locations
- f) Emergency exits and panic button locations

To promote professionalism and organization, all employees will be expected to follow the established safety practices set forth in the Security Plan, be in compliance with the approved uniform dress code for their respective position of employment, display proper hygiene, keep a professional physical appearance, and wear their agent card at all times.

Security Plan

All employees will go through the Coalinga Live scan and background check and hold a local employee badge to operate in cannabis in the City of Coalinga. In addition to a 24/7 security guard, a robust camera system will be installed. This system will cover all vehicles in and out , all outdoor grow area, all interior buildings in use , as well as all buildings entrance/ exit points. This will be accessible to the Police Chief and saved on DVR.

The existing outdoor security lighting will be utilized.

Curing and temporary inventory storage will be maintained onsite in existing buildings, as it awaits distribution (by a state licensed Distribution company) to the manufacturing business (CCP) via truck to another building on the property.

Cannabis waste will be disposed of onsite and composted in a manner which complies with Cal Cannabis. The location of the Cannabis Waste Storage / Compost area is indicated on the property map.

All cannabis seeds and harvested plants will be tracked and accounted for in a state required system called metric. All movement of the plant to the manufacturing facility will be done with a manifest generated through Metric.

CCP will implement a comprehensive security plan that addresses facility security, the facility's security system, product security during cultivation and drying/processing, product security during transport on site, and the secure handling of all cannabis in order to prevent theft and diversion.

CCP's security plan is designed with the view that facility and product protection begin with the layout of the site and the facility's floor plan.

The facility and site are designed to be secure. CCP will equip the site with a surveillance system, interior area access control,

Seed-to-sale software, a state-of-the-art-inventory control system designed for the cannabis industry.

Exterior Building Security

CCP's Facility will be built specifically for the cultivation and processing of cannabis.

The facility entrance/exit is well-secured, including the commercial building with a secure loading bay. A secure access entrance is

established at the secure main gate. To prevent unauthorized access, only

authorized persons will have access through the security guard. All others will be admitted manually by security personal at the

beginning of their shift.

To prevent access into the Facility, there are limited points of access. The building has one main entrance, a secure loading bay and exits used for emergency exit only.

These doors shall remain locked at all times except for authorized access. All doors

(whether interior or exterior) shall have electronic surveillance and sounding alarm equipment to deter and detect unauthorized intrusion and emergency exits.

There shall be no signage on the building, except the address, as it will not be used for commercial retail purposes and has no need, and limited expectation, for visitors. Further, the absence of signage is in keeping with the requirements of the statute while at the same time minimizing the presence of an attractive nuisance.

Lack of signage will help limit attention and thus, the threat of crime.

The Facility's mundane aesthetic is ideal for anonymity and security purposes. In addition, CCP will prevent views into outdoor plants with fencing and privacy screen.

The main entrance area will be clearly secure and hardened to deter unauthorized visitors. The main entrance area will be equipped with panic buttons to alert authorities in the event of an emergency. CCP shall implement strict security measures to ensure that only the main entrance and secure loading bay is used for access to the premises.

The exterior of the building shall be equipped with an automatic lighting, and video monitoring to detect unwanted and unauthorized intrusion.

CCP, through planned construction improvements and security equipment installation will ensure that the building, people and product inside are safe from unwanted or negligent harm, and that plants and products are not observable from outside the facility.

All exterior access doors (main as well as emergency exit) shall be well-illuminated. Real time recording video cameras (with remote

viewing screens located in the Security office) shall be situated thereabout to ensure visibility of persons accessing or attempting to access the Facility. Access shall be granted through the call-up monitor operated by security personnel and Coalinga Police Chief.

These perimeter and exterior security features, working independently or in concert, shall serve to limit the threat of crime or its success.

Interior Building Security

The interior of the Facility will be illuminated at all times and shall be divided into the main entrance, employee lockers and break room, bathrooms, general storage areas, and into segregated areas relating to the various stages of cannabis cultivation and processing (“access areas”). All access areas that house any cannabis products for any reason, and in any quantity, will be secured by an automatic locking device and shall have a sign posted at all entryways which shall be a minimum of 12 inches in height and 12 inches in length and shall state:

Access thereto shall be limited to the following:

1. Employees having appropriate authority
2. Laboratory staff collecting cannabis samples for purposes of conducting laboratory tests
3. State Inspectors
4. State
5. Local law enforcement
6. Badged and escorted Visitors
7. Emergency personnel performing their duties

Each access area, and the hallways in between, shall be equipped with real-time electronic video cameras (with remote viewing screens located in the Security Office) situated thereabout to ensure visibility of employees and escorted visitors working in the Facility. Video cameras will also be situated in and about the sensitive areas of the Facility so as to prevent the theft, loss or diversion of cannabis. The various access areas within the interior of the

Do Not Enter

Limited Access Area

Access Limited to

Authorized Personnel Only

Facility shall be securely separated from one another and only accessible by those employees whose job necessitates their entry into specific designated areas and who display proper identification. Interior areas not associated with cultivation practices shall be well illuminated, clean, free of debris and properly maintained.

Those access areas that are dimly illuminated due to cultivation practices, shall have the appropriate video surveillance equipment in order to ensure the visibility of those persons located therein and a related and detailed report regarding the specific area the times, dates, and the reasons for the same not being well illuminated.

The main entrance and all access areas within the Facility will be equipped with controlled access measures that will allow access to authorized employees. Further, this will ensure permit only authorized employees, at the time of their shift, into the access area into which they are permitted. All other doors will be, and shall remain, securely locked at all times.

Facility Storage

CCP will only store cannabis in secure rooms equipped with motion detected cameras and will limit storage area access to the

minimum number of specifically authorized personnel necessary for efficient operations of the Facility.

Employee Training

CCP will implement a comprehensive employee-training program, so that each employee understands their role keeping the facility, themselves, and products safe and secure.

CCP will also implement systems that facilitate access by local law enforcement to the site and facility. Product location data, surveillance video and inventory reports will also be made available in real time.

Hours of Operation

The business shall operate, generally, in staggered 24-hours per day, 7 days a week.

Security Employees' shifts will be allocated so as to provide security at the Facility 24-hours a day, 7-days a week.

Should the Facility need to be closed, it shall be securely locked and the exterior entrance alarm system shall be activated. The exterior entrance alarm system will operate separately from any other alarm system at the Facility and the system will be able to immediately detect and notify authorities of unauthorized entrance at times when the Facility is closed.

The Security Director and Agent-in-Charge shall keep keys and access codes to the alarm system and the building. This information will remain confidential and secured so as to prevent access to the Facility by anyone other than authorized employees. Only the Cultivation Manager shall have the ability to unlock exterior doors for the purposes of commencing business and to deactivate the access alarm.

Security Manager

CCP shall select a Security Manager to provide the leadership and training to ensure a secure business environment. The Security Manager shall have excellent written

and verbal communication skills, leadership and investigational skill; be able to work with a team, and demonstrate a history of prior professional experience in the field of law enforcement or security operations. The Security Manager shall make himself or herself known to all law enforcement and emergency providers serving the Facility. (S)He shall foster a good relationship with these individuals and work in conjunction with such professionals to ensure that safety and security concerns are constantly addressed and continually monitored.

The Security Manager and Agent-in-Charge shall conduct security and emergency preparedness staff training by developing, scheduling and/or facilitating training for employees in order to ensure that all employees meet and exceed all applicable building security requirements. The Security Manager, in conjunction with the Agent-in-Charge, will provide oversight, and continual evaluation of CPP's Security Plan for the continuous betterment of proactive responsiveness to changing safety conditions.

In addition to information regarding the product that is kept in CPP's ICS, the Security Manager's office shall house all sensitive information such as keys, codes, records and reports in a safe and locked cabinet. The security office shall also house video monitors for the live and recorded video feed collected from the video cameras located in, about and around the Facility. In addition to the SP, the DPH/CCC and local police authorities, video camera monitoring shall also be provided to the Agent-in-Charge, Security Manager, CEO and Compliance Officers by the use of a smart phone application that provides live video monitoring from various video devices throughout the Facility. Footage there shall be recorded and maintained offsite for no less than ninety (90) days on-site and an additional ninety (90) days offsite, or longer if required by the DPH/CCC or the SP.

Hiring & Vendor Selection

Facility security is enhanced by the selection of qualified personnel to assist with the operation of the business. To promote public perception and the security

interests of CPP, all prospective employees and vendors shall be stringently vetted during the application process. Each employment candidate shall undergo a thorough background check, drug test, and character assessment and review. Only the most desirable candidates will be selected.

However, and in any event, a person who:

1. Has been convicted of an excluded felony offense;
2. Does not work pursuant to the Regulations of the Division or
3. Is less than 18 years of age

All vendors shall have all requisite licenses and legal authority to operate its business. Employees shall, at all times during employment, display their valid employee card. An employee needing to update or report a lost agent card must report the same to Security Manager or Agent-in-Charge.

Security Staff

As part of the employee pool, CPP will hire security company Professional Property Protection (PPP) to assist the Manager with the performance and implementation of the Security Plan.

Security staff will wear a distinct uniform, act and address individuals in a formal manner, and continuously patrol when not on a fixed duty assignment.

Employee Log

For the safety and security of the premises surrounding the building, the building, its occupants, plants and products, the Security Manager will keep a current and accessible roster of all employees and ensure that all employees are aware of terminations or duty reassignments as they occur. All terminated employees or those not having valid agent cards shall be prohibited from being in, on or about the Facility.

Employee Termination

Upon termination of any employee, whether it be voluntary or involuntary, CPP shall ensure that terminated employee's keys, uniform, tools and access codes and cards are returned, and ensure that such codes and access points are altered so as to prevent the terminated employees' access. VGG shall notify the DPH/CCC within ten (10) days after a medical marijuana establishment agent ceases to be employed by at the Facility.

Premises Access

There is limited expectation for visitors at the Facility. Lack of signage and public visitation will prevent unwanted attention and thus, the threat of crime.

It is CPP's intent to pursue anonymity as a security strategy. CPP's Security Plan details protocols to ensure:

1. Only authorized employees have access to the Facility
2. Only certain authorized employees have access to the locked segregated areas within the Facility that contain cannabis.
3. Unauthorized access into any access area will result in the automatic triggering of audible and visible alarms to prevent unwanted access
4. All employees are properly identified and display their employee card
5. All visitors are properly badged, supervised and escorted

In the event of an emergency, the security manager will assist all emergency service providers so as to ensure that the emergency situation is remedied, employees and visitors are clear of harm, and that any risk of loss, theft, or diversion is quelled.

Employee and Visitor Badges

The only persons who may be on the premises of CCP's Facility are:

1. An employee
2. A person with appropriate authority and a visitor identification badge
3. A person inspecting CCP's facility with proper government authority

Any person other than those authorized to be on the Facility premises must obtain a visitor identification badge from CCP at the time of entering the main entrance. All persons on or about the premises must visibly display proper identification at all times. Any lost or stolen agent card, or those that may need to be updated, must be immediately reported to the Security Manager and the DPH/CCC.

Only authorized employees may dispense visitor badges, and only upon verification of such person's valid state picture identification card (i.e. driver's license), completion of the visitor information form, and such person's signature thereon and on the visitor log. The visitor log shall indicate the date, time and duration of the visit as well as the escort responsible for the visitor.

A person who obtains a visitor identification badge, including, without limitation, an outside vendor or contractor, if appropriate:

1. Must be escorted and monitored by an agent at all times he or she is on the premises
2. Must visibly display his or her visitor identification badge at all times he or she is on the premises
3. Must return the visitor identification badge to CCP upon leaving the premises of the medical marijuana establishment and sign out

Visitor Log

CCP shall maintain a visitor log that includes the name of the visitor and the date, time and purpose of each visit by a person other than those authorized to be on the premises as an Employee. CCP shall make its visitor log available to all regulatory agencies and local law enforcement upon request.

Facility Layout and Security Drawings

CCP will provide current copies of facility floor plans to the City of Coalinga and local law enforcement, as well as current contact information for the Agent-in-Charge, Security Manager, and owner.

Security Surveillance System

CCP's facility will implement a security surveillance system that will provide for 24-hour, seven day a week closed-circuit television (CCTV) surveillance system that covers the Facility site and facility. The Police Chief will have real-time access to all parts of CCP's security surveillance system.

A. Specifically, the Electronic Surveillance System will comply with the following minimum standards:

1. CCP will operate and maintain in good working order a 24-hour, seven day a week closed circuit television surveillance system. Cameras will be located as follows:

a. CCTV surveillance system will visually record

i. All building entrances and exits

ii. All parking lot areas

iii. Facility emergency access roads

iv. All areas inside the facility including:

1. All limited access areas

2. All areas where cannabis is produced

3. All areas where cannabis is processed

4. All areas where cannabis is stored

5. All areas where cannabis is shipped

6. All areas where cannabis is destroyed

b. Areas excluded from CCTV coverage are the following:

i. Restroom Facilities

ii. Executive Offices

c. Cameras will be installed to provide a consistent recorded image that maximizes the quality of facial and body images. Facility cameras will be located to address the following:

i. Backlighting and physical obstructions

ii. The growth cycle of plants in the Flower Grow Area(s)

2. Fixed Cameras with the ability to shoot in low light will be installed. These cameras will be day/night cameras with a minimum resolution of 600 lines per inch (analog) or D1 (IP) and a minimum light factor requirement of 0.7 LUX. CCP will install lighting to increase picture clarity and brightness. Cameras will be serviced and calibrated to maximize the quality of the recorded image. These low light capable cameras will be used in the following areas:

a. Dry/Cure Areas

b. Flower Grow Areas

c. Vegetative Grow Areas

3. The recording device will meet the following minimum standards:

a. Display a date and time stamp on all video

b. Remain operational during a power outage

c. Allow for the exporting of still images industry standard formats including .jpg, .bmp, and .gif

d. Exported video will be exported in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place.

- e. Exported video will also be exported in an industry standard file format that played on any Windows PC
- 4. Electronic recording system will be maintained in good working order at all times. Facility's Agent-in-Charge will instruct each manager, employee, or agent overseeing the functioning of the surveillance system to immediately report to the Agent-in-Charge any malfunctioning or technical problems with the system.
- 5. Security Recording images will be HD.
- 6. Security Recordings will be retained for at least 90 days at the Facility using a recording system located in a locked tamper-proof room.
- 7. A video printer capable of producing a clear still photo from any camera image will be attached to the system.
- 8. Any requested recordings and videos and photos be turned over to local law enforcement upon request.
- B. Access to the electronic surveillance recording and control areas to the following:
 - 1. Employees essential to Facility surveillance operations
 - 2. The CDFA
 - 3. Law enforcement agencies
 - 4. Security system service personnel

Product Security

CCP will use the following inventory control methods to maintain a current inventory of all products grown, harvested, processed, moved, sold and/or destroyed.

Inventory Control System

CCP will implement an inventory control system to monitor the chain of custody of cannabis used for medical purposes from the point of cultivation to the delivery to an authorized secure transport contractor. CCP's Inventory Control System (ICS) will include young plants, mature plants, stock plants, raw materials harvested, all cannabis waste and all products in various stages of processing and packaging.

CCP will implement Metric, the sophisticated Seed-to-sale software system to will allow CCP to successfully manage inventory and report to the appropriate authorities.

Responsible Employee

The CCP's Agent-in-Charge is the designated employee with oversight of CCP's Metric and overall inventory management.

This agent will manage and track cannabis at every stage into, through and out of the facility.

At regular, required and/or necessary intervals, CCP will manage, check and monitor inventory, such that CCP can accurately and consistently document the status of all plants and products in the manufacturing process.

CCP will use its Metric and other software and records to document:

6. Each day's beginning inventory, acquisitions, harvests, sales, disbursements, designation and disposal of unusable cannabis, and ending inventory.
7. Any samples provided, including the provision, return and/or destruction of the same, as set forth by law and regulation.
8. Each batch of cannabis cultivated, including:
 - a. The batch number;
 - b. The number of cannabis seeds or cannabis cuttings planted

- c. The date the cannabis seeds or cuttings were planted
- d. The list of all chemical additives, including, without limitation, pesticides, herbicides and fertilizers used in the cultivation
- e. The number of plants grown to maturity

9. At harvest, CCP will document, without limitation:

- a. Date of harvest
- b. Wet weight of the harvest
- c. Wet weight of the Cannabis waste
- d. The name and employee registration card number of the employee responsible for the harvest.

A complete physical inventory of both usable and unusable cannabis will be performed on a weekly basis and logged by CCP's staff will document the following:

- 1. Date of the inventory
- 2. Summary of the inventory findings
- 3. The name, signature and title of the employees who conducted the inventory and the agent-in-charge who oversaw the inventory
- 4. CCP staff will count and precisely weigh all products, including:
 - a. Harvested Cannabis
 - b. Cannabis in various stages of production, including leaves and byproduct
 - c. Cannabis products in quarantine
 - d. Waste Cannabis awaiting disposal
 - e. Cannabis plants in various stages of growth, including seedlings and seeds.

Records of all cannabis moved will show:

1. The date of transfer
2. The name of the secure transport company and employee
3. The name of facility to which cannabis was delivered
4. Batch number, product name(s) and quantity of cannabis

Records of all Cannabis destroyed will show:

1. The date the cannabis was destroyed
2. Manner in which it was destroyed
3. Reason it was destroyed
4. Employee responsible for the destruction of the cannabis

Random Physical Inventory Checks

Random physical inventory checks will be conducted throughout the facility, throughout the year. CCP's staff will document one or more of the following:

- a. Packaged Cannabis
- b. Cannabis in various stages of production, including leaves and byproduct
- c. Products in quarantine
- d. Waste Cannabis awaiting disposal
- e. Cannabis that is reserved for a Dispensary
- f. Cannabis plants in various stages of growth, including seedlings and seeds.

Annual Inventory

A complete and accurate recording of all cannabis plant stock and products on hand will be prepared annually on or before the anniversary of the initial inventory under the direct supervision of the Agent-in-Charge.

Inventory Audit

The Agent-in-Charge shall conduct and document a system-wide audit of the inventory of the establishment that is accounted for according to generally accepted accounting principles at least once every year.

Justified Inventory Adjustments Can Be Made

(to be provided)

Only Authorized Personnel Can Make Adjustments

(to be provided)

Inventory Discrepancy Procedures

If an audit or random inventory check identifies a reduction in the amount of medical cannabis in the inventory of the establishment not due to documented causes, or in the event actual inventory counts do not match the recorded or expected counts, the CCP shall determine where the loss has occurred and take and document corrective action. If the reduction in the amount of medical cannabis in the inventory of the establishment is due to suspected criminal activity by an employee, shall report the employee to the CDPH and to the appropriate law enforcement authorities.

When a significant discrepancy in inventory occurs, the Agent-in-Charge will conduct an internal audit and investigation. The Agent-in-Charge will document the incident in a report that includes the following information:

1. Incident date
2. Name of people involved
3. A description of the incident
4. Identification of known or suspected causes of the event any corrective actions taken. Pursuant to law all such incidents will be reported to regulatory and/or law enforcement authorities.

Cannabis Waste Tracking and Notification

All waste will be secured, locked and tracked in accordance with State regulations

and the Facility's Operations and Management Practices Plan.

Solid Cannabis Waste Handling Procedure

- 1) The cannabis waste will be weighed
- 2) Data will be recorded noting date, weight, wet or dry, batch number, plant variety or product and section of the facility generating the waste.

- 3) The waste will be moved physically to the Secure Waste Storage and then the compost area.

All aspects of the cannabis plants, byproduct wastes, weights, ID numbers and associated data is stored in the system indefinitely. Destruction event information and explanations are also documented and stored within the Seed-to-sale software system. This data cannot be modified or deleted by the facility employees or even by Seed-to-sale software.

Seed-to-sale software records manual inventory adjustments through a detailed notes section. The reason for disposal and, if applicable, disposal company are recorded and archived to the 16-digit barcode associated with the disposed cannabis. As with all transactions in the Seed-to-sale software system, the employee responsible for the transaction is required to enter a PIN number or biometric fingerprint recording the date, time, and reason for the transaction.

Record Keeping

CCP will maintain any and all inventory records and documentation for at least five years after the date on the document. All documents will be available upon request.

Inventory Procedures

Please provide a detailed response to the items below. If more space is needed additional pages may be added. Microbusinesses must complete this form for each commercial cannabis activity they intend to engage in.

Business Name and Application Type:

Primary Contact Name, Email, and Phone Number:

1. Using a diagram, indicate where on the licensed premises cannabis goods will be stored.

2. Describe who has access to the areas in which cannabis goods are stored.

3. Describe the security measures in place at the location where cannabis goods are stored.

4. Describe the conditions of the location where the cannabis goods are stored. Can the temperature and/or humidity be controlled?

5. Describe the training provided to employees regarding inventory procedures.

6. Describe the process for receiving new inventory of cannabis goods.

a. Describe where the cannabis goods are received.

b. Identify who will receive the cannabis goods, such as a manager or an employee.

c. Describe how the cannabis goods are moved to the cannabis storage area.

d. Describe what records are produced.

7. Describe the type of inventory records that are produced and maintained regarding the movement of inventory.

8. Describe the process for removing cannabis goods from inventory.


a. Describe what happens to the cannabis goods after they are removed from inventory, including any records that are produced.

9. Describe the methods used to ensure that the cannabis goods stored are preserved and do not degrade.

10. How often is inventory reconciliation conducted?

a. Describe the process for inventory reconciliation and the types of records that are produced.

Applicant Signature



Date Signed

Cannabis Waste Management Procedures

Please provide a detailed response to the items below. If more space is needed additional pages may be added. Microbusinesses must complete this form for each commercial cannabis activity they intend to engage in.

Business Name and Application Type:
Claremont Capital Partners, LLC

Primary Contact Name, Email, and Phone Number:
Casey Dalton-Schutt, caseydalton@gmail.com, (818) 635-8795

1. Describe how cannabis waste is generated, stored, and managed within the licensed premises.

All organic plant waste is generated from the harvest of the cannabis plant.
The waste will consist of stems, leaves and some trim from our outdoor grow operation.
This waste is moved, stored and locked in a secure storage area designated for compost.
This 100% secure storage area is under lock and key and on camera 24/7.
This area is also monitored by 24/7 live security guard. The secure compost area is 2500 square feet.

2. Identify the type of solid waste facility to which cannabis waste is transported to from the premises. (If not applicable state N/A):

a. Solid-waste landfill operation or facility?

N/A

b. Transformation operation or facility?

N/A

c. Composting operation or facility?

N/A

d. In-vessel digestion operation or facility?

N/A

e. Transfer/processing operation or facility?

N/A

f. Chip-and-grind operation or facility?

N/A

3. Describe the procedures for ensuring that cannabis waste is stored in a secured waste receptacle and describe the measures taken to restrict access to the cannabis waste to the licensee, its employees, and third-party hauler.

The composting area is fenced and gated and access is restricted to the appropriate outdoor cultivation staff. Strict SOP's will ensure the area is always kept locked and only allow one person/employee at a time that is signed in and designated to enter the area.
All activity is under 24/7 surveillance by both camera and live security guard.

4. If a third-party waste hauler collects and processes cannabis waste from the proposed premises, identify the type or types of third-party waste hauler(s) used: local agency, waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency.

N/A

5. If a third-party waste hauler is used, describe the process for documenting and confirming the receipt of the cannabis waste at the solid waste facility.

N/A

6. If engaging in self-hauling of cannabis waste, describe the procedures followed, including how the delivery of cannabis waste is documented.

N/A

7. Identify whether the proposed commercial cannabis activities will result in the generation of hazardous waste such as spent solvents or compressed gas cylinders.

The outdoor cultivation will not result in the generation of hazardous waste.

8. If hazardous waste is generated, describe how it will be stored and managed within the licensed premises. Attach a copy of the pertinent Hazardous Material Business Plan, if available.

N/A

9. If cannabis waste is composted within the licensed premises, describe the composting procedures.

In the composting area, the waste is formed into windrows or piles. These are watered and turned by hand as needed to maintain optimal moisture, temperature, and oxygen levels. After 90-120 days, the finished commpost may be blended with other additives such as gypsum, sawdust, wood chips, or Sulphur and is used on site as a ssoil conditioner in the fields or as a planting medium in the nursery and/or greenhouses.

10. Will your business generate four or more cubic yards of solid waste per week? If yes, describe the procedures for recycling organic waste such as composting on-site, self-hauling, or the use of a third-party hauler.

No. And all organic waste that is generated is composted and used for beneficial purposes onsite.

Applicant Signature



Date Signed
08/31/20

CALCANNABIS CULTIVATION LICENSING PEST MANAGEMENT PLAN

Cultural Pest-Management Control Methods

At this time we are not going to be using any cultural methods, such as crop rotation or tillage.

Biological Pest-Management Control Methods

At this time we are not going to be using any biological methods, such as sticky traps or beneficial predators.

Chemical Pest-Management Control Methods

Fertilizer, Pesticide, Herbicide, and Rodenticide BPTC Measures

Summary of Chemical Pest Management Activities

The goals of the Cultivation of Cannabis at the subject property IPM plan are to minimize the impact of site management practices on the local environment, and to reduce the exposure of occupants, staff and maintenance personnel to potentially hazardous chemical, biological and particle contaminants.

As indicated in the Integrated Pest Management Plan, the cultivation operations plan to employ a three tier system as partially outlined below in 2.2 'Products approved for use' (Tier 1) at the subject property. All chemical products are to be delivered to the proposed storage facility located adjacent to the cultivation area. Whereupon staff review the delivery order for accuracy and transport the products to the secure storage area notated as existing storage. Products will be evaluated to determine order frequency based on quarterly volume use.

Chemical products will be stored in a secure building. Each area will be sectioned off to isolate incompatible products that may off-gas during storage and use. All product storage facilities will be equipped with secondary containment that meets or exceeds 110% of the total volume of products stored therein.

Chemical pesticides are considered a last resort under the tenets of integrated pest management plan. Pesticides and/or Fertilizers are to be used by the applicant or a responsible 3rd party professional after non-chemical options have been exhausted. Chemical pesticides are to be used according to the manufacturer's specifications.

Provisions for the use of chemical, biological, and cultural methods are subject to review and refinement upon completion of a biological resources assessment by a qualified professional and/or the availability of pertinent information.

Products approved for use (Tier 1) at the Subject Property are:

Tier 1 organic material that is used to produce organic food and fiber products such as carrots, granola bars and cotton that are certified by an accredited certifying body. The tier rankings intended to provide a process whereby the applicant or a responsible 3rd party professional, are able to address pests in a predictable process. Where a Tier 1 chemical method is determined to be of “lowest concern,” because the product contains:

- No known, likely, or probable carcinogens
- No reproductive toxicants (CA Prop 65 list)
- No ingredients listed by the EPA as known, probable, or suspect endocrine disrupters active ingredients has soil half-life of thirty days or less
- and is labeled as not toxic to fish, birds, bees, wildlife, or domestic animals

Tier 1 products approved for use at the Subject Property are:

Type of Material	Name of Material	Amount Stored onsite	Active Ingredients
Pest Control	Azamax	28 Gallon	Azadirachtin
Pest, Fungicides, and Antimicrobial Control	Neem Oil	700 Gallons	Azadirachtin
Pest Control	Rosemary oil	28 Gallon	Rosemary
Fertilizer	MaxSea Grow	2800 lbs.	Seaweed
Fertilizer	MaxSea Bloom	2800 lbs.	Seaweed
Fertilizer	Bio Buzz	700 Gallons	Aloe Vera
Fertilizer	Molasses	87 Gallons	Sugar
Fertilizer	Canna Coco A&B	140 Liters	Humours and fulvic acids
Fertilizer	Mexican Bat Guano	140 Gallons	Nitrogen, Phosphorous, Potassium
Fertilizer	Cal-Mag (16/16/16)	28 Gallon	Calcium, Magnesium, and Iron

Additional Products for Emergency Conditions

Tier 2 products are of “moderate concern” and to be used under emergency conditions (as defined above) or in the event that both preventative methods and least-toxic pesticides prove to be ineffective at pest control.

Tier 2 products approved for use under the conditions outlined above at the Cannabis Cultivation premises are:

Type of Material	Name of Material	Amount Stored onsite	Active Ingredients
Fungicide	Regalia	As needed	Extract of Reynoutria Sachalinensis
Pest Control	Monterey BT	As needed	Bacillus thuringiensis
Fungicide and Antimicrobial Control	Lost Coast Plant Therapy	As needed	Soybean oil
Pest Control	Green Cleaner	As needed	Soybean oil
Pest Control	Venerate Marrone Bio	As needed	Burkholderia
Pest Control	Grandevo Marrone Bio	As needed	Chromobacterium subsugae

Spill prevention and clean-up

All Chemical Storage areas will keep and use absorbent materials designated for spill containment and spill cleanup equipment on-site for use in an accidental spill of fertilizers, petroleum products, hazardous materials, and other substances which may degrade waters of the state and have the potential to harm human or environmental health.

Container Management:

- All chemical product containers must be labeled pursuant to OSHA hazardous communication guidelines and OSHA Safety Data Sheets (SDS) must be immediately available for review.
- All chemical product substance containers must be in good condition and compatible with the materials stored within.
- All chemical product containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
- Empty chemical product containers (drums) must have all markers and labels removed and the container marked with the word ‘empty’.
- Any spills on the exterior of the container must be cleaned immediately, as outlined below in the clean-up procedures.
- Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.

- Do not overfill waste drums. 4" of headspace must remain to allow for expansion.

Good Housekeeping:

- All chemical products must be stored inside buildings.
- Store chemical products not used daily in cabinets, or in designated areas.
- All chemicals that are transferred from larger to smaller containers must be transferred by use of a funnel or spigot.
- All chemical product containers should be closed while not in use.
- Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment.
- Implement preventative maintenance activities to reduce the potential for release from equipment.
- Periodically inspect equipment and hazardous substance storage areas to ensure leaks or spills are not occurring.
- Use signage to identify hazardous substance storage or waste collection areas.
- Keep all work areas and hazardous substance storage areas clean and in good general condition.

Security Procedures

Please provide a detailed response to the items below. If more space is needed additional pages may be added. Microbusinesses must complete this form for each commercial cannabis activity they intend to engage in.

Business Name and Application Type:

Primary Contact Name, Email, and Phone Number:

1. Describe who is responsible for implementing the Security Operating Procedures and list each person's role and responsibilities.

2. Describe how the applicant will ensure all access points will be secured, which includes a description of all entrances and exits, windows, and doorways and the types of locks used.

3. Describe the procedures for allowing individuals access to the premises, which includes:

a. A list of employees who have access including their roles and responsibilities.

b. A description of how the applicant will ensure only authorized persons have access to the licensed premises and its limited access areas.

- c. A description of how the applicant will maintain an accurate record of all non-employee authorized individuals allowed onsite, in conformance with section 5042 of the Bureau's regulations.

4. Describe how the applicant will comply with the employee badge requirement in section 5043 of the Bureau's regulations, including how the applicant will assign employee numbers and what the procedures are when an employee changes responsibilities or leaves the employment of the licensee.

5. Provide a description of the video surveillance system, which includes:

- a. A description of the types of cameras and video storage equipment.

- c. A description of the procedures for the maintenance of the video surveillance equipment.

d. A description of how the applicant will be notified of video surveillance system-failure or malfunction.

e. A description of how the video surveillance system will be monitored.

f. A description of how the applicant will produce copies of video recordings at the licensed premises immediately upon request of the Bureau.

g. A description of how the applicant will share the video surveillance system with other licensees (when sharing services at the same location), if applicable.

6. Provide information regarding the use of security personnel onsite, which includes:

a. Whether the security personnel will be employed by the applicant or contracted. If contracted, provide the name of the security company, license numbers, contact person, phone number of personnel that will be providing services, and a copy of the contract.

b. Where the security personnel will be stationed on the licensed premises and/or which areas will be covered by roving security.

c. The hours security personnel will be onsite.

d. A description of how the applicant will share security personnel with other licensees (when sharing services at the same location), if applicable.

e. Will the security personnel be armed or unarmed?

7. Provide a description of the security alarm system, which includes:

a. The name, license number, address, phone number, and contact person of the alarm company that installed, maintains, and monitors the alarm system.

b. How the applicant will ensure the alarm system remains operational, including the frequency of maintenance checks by the alarm company.

c. A description of the alarm system features, including whether it has motion detection sensors inside the premises.

d. A description of how an alarm will be responded to, including whether law enforcement personnel will be notified.

e. A description of how licensees will be sharing the alarm system with other licensees (when sharing services at the same location), if applicable.

Applicant Signature		Date Signed
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