#2026-195
501 Pingree Road – Special Use Permit
Project Review for Planning and Zoning Commission

Meeting Date: October 21, 2026

Request: Amendment to the Special Use Permit for a Cannabis Dispensary to allow a drive-through use.

Location: 501 Pingree Road

Acreage: Approximately 1.6 acres

Existing Zoning: B-2 PUD General Commercial

Surrounding Properties:

North:	B-2 General Commercial
South:	B-2 PUD General Commercial
East:	B-2 PUD General Commercial
West:	B-2 PUD General Commercial

Staff Contact: Elizabeth Maxwell (815.356.3615)

Background:

- Existing Use: The site is an existing cannabis dispensary receiving approval in 2021.
- Previous Approvals: The existing Special Use Permit has a no drive-through use restriction.

Development Analysis:

General

- Request: The request to amend the existing Special Use Permit to allow drive-through operation to be in concert with current State regulations/allowances.
- Land Use: The land use map shows the area as Commerce. This land use designation is appropriate for this use.
- Zoning: The site is zoned B-2 PUD. The use of the property as a Cannabis Dispensary, which is allowed as a Special Use in the B-2 zoning district.
- The SUP ordinance for this specific property restricted the drive-through use since it was not allowed per State Statute at the time of approval and the property is a former fast food restaurant. The State amended the law in 2026 and now allows drive-through for cannabis dispensaries.

Comprehensive Land Use Plan 2030 Plan Review:

The Comprehensive Plan designates the subject property as Commerce, which allows for existing and future commercial, service and office uses. The following goal is applicable to this request:

Land Use - Commerce

Goal: Maintain a dynamic and sustainable base of commercial uses that provides a solid tax base, goods, services and jobs to the City, as well as the surrounding region through coordination in the Unified Development Ordinance, Comprehensive Land Use Plan and Economic Development Strategic Plan.

This can be accomplished with the following supporting action:

Supporting Action: Promote, retain, and attract businesses that provide a diverse tax base.

Economic Development – Revitalize and Enhance Key Commercial Corridors

Goal: Establish funding sources and work with property owners to assist with and encourage the redevelopment of commercial areas.

Economic Development – Attract and Retain Businesses

Goal: Establish marketing efforts to attract and retain businesses throughout the City.

This can be accomplished with the following supporting action:

Supporting Action: Continue to solicit the retail businesses which are most likely to succeed in various retail nodes in Crystal Lake.

Success Indicator: the number of retail businesses – grocery, restaurants, coffee/juice shops, apparel, electronics, and comparison goods – contacted, started and/or relocated.

Findings of Fact:

SPECIAL USE PERMIT

The petitioner has requested a Special Use Permit Amendment to allow the drive-through use for a Cannabis Dispensary. The below Special Use Permit review criteria were found to be met when the SUP was approved. Special Uses require a separate review because of their potential to impact surrounding properties and the orderly development of the City. Section 2-400 B of the Unified Development Ordinance establishes standard for all Special Uses in Crystal Lake. The criteria are as follows:

1. The use is necessary or desirable, at the proposed location, to provide a service or facility which will further the public convenience and general welfare.

   ☐ *Meets* ☐ *Does not meet*

2. The use will not be detrimental to area property values.

   ☐ *Meets* ☐ *Does not meet*

3. The use will comply with the zoning districts regulations.

   ☐ *Meets* ☐ *Does not meet*

4. The use will not negatively impact traffic circulation.

   ☐ *Meets* ☐ *Does not meet*

5. The use will not negatively impact public utilities or municipal service delivery systems. If required, the use will contribute financially to the upgrading of public utilities and municipal service delivery systems.

   ☐ *Meets* ☐ *Does not meet*

6. The use will not negatively impact the environment or be unsightly.

   ☐ *Meets* ☐ *Does not meet*

7. The use, where possible will preserve existing mature vegetation, and provide landscaping and architecture, which is aesthetically pleasing, compatible or complementary to surrounding properties and acceptable by community standards.

   ☐ *Meets* ☐ *Does not meet*

8. The use will meet requirements of all regulating governmental agencies.

   ☐ *Meets* ☐ *Does not meet*

9. The use will conform to any conditions approved as part of the issued Special Use Permit.

   ☐ *Meets* ☐ *Does not meet*

10. The use will conform to the regulations established for specific special uses, where applicable.

    ☐ *Meets* ☐ *Does not meet*

Recommended Conditions:

If a motion to recommend approval of the petitioner's request is made, it should be with the following conditions:

1. Approved plans, reflecting staff and advisory board recommendations, as approved by the City Council:
   A. Application (Ivy Hall Dispensary, received 09/15/26)

2. All conditions from Ordinance 7746 shall remain applicable unless modified by this request.

PIQ Map
501 Pingree Road



City of Crystal Lake
Development Application

Office Use Only
File # _____

Project Title: Ivy Hall Crystal Lake Drive-Thru

Action Requested

___ Annexation	___ Preliminary PUD
___ Comprehensive Plan Amendment	___ Preliminary Plat of Subdivision
___ Conceptual PUD Review	___ Rezoning
___ Final PUD	X Special Use Permit
___ Final PUD Amendment	___ Variation
___ Final Plat of Subdivision	___ Other

Petitioner Information

Name: Ivy Hall Dispensary

Address: 501 Pingree Rd, Crystal Lake, 60014

Phone: [redacted]

Fax:

E-mail: [redacted]o

Owner Information (if different)

501 Pingree LLC by:

Name: Mike Hagenson

Address: [redacted] W. Diversey Avenue
Chicago, IL 60647

Phone: [redacted]

Fax:

E-mail: [redacted]

Property Information

Project Description: Adding drive thru pickup to SUP

Project Address/Location: 501 Pingree Rd, Crystal Lake 60014

PIN Number(s): 19-04-476-016

Development Team

Please include address, phone, fax and e-mail

Developer: VDR Development Group [redacted] Brandon Dr, Glendale Heights, IL 60139. [redacted]

Architect: JTS Architects [redacted] Higgins Road, Suite 202, Elk Grove Village, IL 60007 [redacted]

Attorney: Joanne Caceras [redacted]

Engineer: JTS Architects [redacted] Higgins Road, Suite 202, Elk Grove Village, IL 60007 [redacted]

Landscape Architect: Jeff Boester [redacted] Road, Bartlett, IL 60103 [redacted]

Planner: JTS Architects [redacted] Road, Suite 202, Elk Grove Village, IL 60007 [redacted]

Surveyor: JTS Architects [redacted] Higgins Road, Suite 202, Elk Grove Village, IL 60007 Phone [redacted]

Other:

Signatures

Brianna Draksler [redacted] 9/15/26

PETITIONER: Print and Sign name (*if different from owner*) **Date**

As owner of the property in question, I hereby authorize the seeking of the above requested action.

501 Pingree LLC, by Mike Hagenson, Authorized Agent [redacted] 9/15/26

OWNER: Print and Sign name **Date**

NOTE: If the property is held in trust, the trust officer must sign this petition as owner. In addition, the trust officer must provide a letter that names all beneficiaries of the trust.

City of Crystal Lake
Development Application
Ownership Sign-off Acknowledgement Form

The following information is related to a development application. As the owner of the property in question, I (we) acknowledge that the information provided in the submittal was reviewed and approved.

Owner Information

Name: Mike Hagenson

Address: _____

_____

Phone: [redacted]

E-mail: [redacted]

Project Name & Description: Ivy Hall Crystal Lake-Drive Thru

Amending the SUP to allow Drive Thru pickup

_____

_____

Project Address/Location: 501 Pingree Rd

Signature

[redacted] 9/18/26

Owner: Print and Sign name Date

NOTE: If the property is held in a trust, the trust officer must sign this petition as owner. In addition, the trust officer must provide a letter that names all beneficiaries of the trust.

Certificate of the Publication

Northwest Herald

Description:IVY HALL DISP ZONING HRNG
2355128

WAGGONER LAW FIRM, PC
4 N. WALKUP AVENUE
CRYSTAL LAKE IL 60014

Shaw Media certifies that it is the publisher of the Northwest Herald. The Northwest Herald is a secular newspaper, has been continuously published daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the City of Crystal Lake, County of McHenry, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 ILCS 5/5.

A notice, a true copy of which is attached, was published one time(s) in the Northwest Herald, namely one time per week for one successive week(s). Publication of the notice was made in the newspaper, dated and published on
10/03/2026

This notice was also placed on a statewide public notice website as required by 715 ILCS 5/2.1.
In witness, Shaw Media has signed this certificate by Jennifer Heintzelman, its Director of Public Notices, at Crystal Lake, Illinois, on
3rd day of October, A.D. 2026

Shaw Media By:

Shaw Media, Director of Public Notices

By: /Jennifer Heintzelman/
its Director of Public Notices

Account Number 30765

Amount $121.63

Ad Number: 2355128

BEFORE THE PLANNING AND ZONING COMMISSION OF THE CITY OF CRYSTAL LAKE, MCHENRY COUNTY, ILLINOIS

IN THE MATTER OF THE PETITION OF
IVY HALL DISPENSARY

LEGAL NOTICE

Notice is hereby given in compliance with the Unified Development Ordinance of the City of Crystal Lake, Illinois that a public hearing will be held before the Planning and Zoning Commission upon the application of the property owner 501 Pingree LLC, and Petitioner, Ivy Hall Dispensary for a Special Use Permit Amendment relating to the real estate commonly known as 501 Pingree Road, Crystal Lake, Illinois 60014, and bearing permanent index number 19-04-476-016.

This application is filed for the purposes of seeking a Special Use Permit Amendment to allow a Cannabis Dispensary with drive-through service, eliminating the former ordinance restriction pursuant to Article 2, Land Use, Article 4 and Article 9-200 Administration. Plans for this project can be viewed at the City of Crystal Lake Community Development Department at City Hall.

A public hearing before the Planning and Zoning Commission for this request will be held at 7:00 p.m. on Wednesday October 21, 2026, at the Crystal Lake City Hall, 100 West Woodstock Street, at which time and place any person determining to be heard may be present.

Jeff Greenman, Chairperson
Planning and Zoning Commission
City of Crystal Lake
(Published Northwest Herald Oct. 3, 2026) 2355128

STATE OF ILLINOIS)
) **SS**
COUNTY OF McHENRY)

IN THE MATTER OF THE APPLICATION OF
Ivy Hall Dispensary

AFFIDAVIT

Lisa M. Waggoner, being first duly sworn on oath deposes and states as follows:

A. That a copy of the legal notice, concerning the hearing date for the above-mentioned Petitioner, was sent to each of the persons named on the attached sheet by regular mail notifying them of the hearing before the Planning and Zoning Commission on October 21, 2026, at 7:00 p.m., at the Crystal Lake City Hall, 100 West Woodstock Street in Crystal Lake, Illinois. Said notice was mailed to each of the persons on the attached List of Adjacent Owners by regular mail on October 2, 2026.

B. That the posting requirements of the Unified Development Ordinance have been complied with by placing the customary public notice sign on the subject property on October 5, 2026.

Lisa M. Waggoner

Subscribed and Sworn to me before
this 6th day of October, 2026.

Sandra S. Kerrick
Notary Public

OFFICIAL SEAL
SANDRA SUE KERRICK
NOTARY PUBLIC, STATE OF ILLINOIS
Commission No. 1002673
My Commission Expires 1/15/29

ORDINANCE NO. 7746
FILE NO. 440

CITY OF CRYSTAL LAKE

AN ORDINANCE GRANTING A SPECIAL USE PERMIT AND VARIATION FOR A CANNABIS DISPENSARY (501 Pingree Road)

WHEREAS, PGSS, LLC (the "***Current Owner***") is the record owner of the real property commonly known as 501 Pingree Road, Crystal Lake, Illinois 60014, PIN: 19-04-476-016, and legally described in Exhibit A attached hereto and made a part hereof (the "***Subject Property***"); and

WHEREAS, Americanna Dream, LLC is the contract purchaser of the Subject Property; and

WHEREAS, Americanna Dream, LLC and CL Dispensary LLC (collectively, the "***Applicant***") have applied to the City of Crystal Lake (the "***City***") for zoning relief to establish a recreational cannabis dispensary (the "***Proposed Use***") upon the Subject Property, and the Current Owner has authorized such application; and

WHEREAS, the Subject Property is located in the City's B-2 zoning district under the Unified Development Ordinance (the "***UDO***"), which authorizes Cannabis Dispensaries as a special use; and

WHEREAS, the Subject Property is currently zoned as B-2 PUD; and

WHEREAS, in particular, the Applicant seeks: (i) a special use permit for the Proposed Use as a cannabis dispensary as authorized under Table 650-2-300 in Section 650-2-200 of the City's Unified Development Ordinance, as well as modifications to the previously approved Final

PUD Plan for the Subject Property consistent with the Proposed Use and the Plans (as hereinafter defined) (the "***SUP Relief***"); and (ii) a variation from the buffer required by 2-400-76(a)(v) for the Proposed Use (the "***Variation Relief***")(collectively, the SUP Relief and the Variation Relief are herein referred to as the "***Requested Relief***"); and

WHEREAS, pursuant to notice duly published and given, the City's Planning and Zoning Commission (the "***PZC***") conducted a public hearing regarding the Requested Relief for the Proposed Use on the Subject Property; and

WHEREAS, during the public hearing, the Applicant offered oral testimony regarding the plans for the development and use of the Proposed Use (as application and narrative filed by Applicant and as depicted on the plans submitted by Application which are collectively attached hereto as Exhibit B-1 and shall hereinafter be referred to as the "***Building and Site Plans***"), noting that the Proposed Use will occupy the building of a former Culver's Restaurant located on the Subject Property, but without drive-through operations; and

WHEREAS, during the public hearing, the Applicant testified that the former Culver's Restaurant ceased operations in 2018 and has remained vacant since that time; and

WHEREAS, during the public hearing, the Applicant further testified regarding the operations and security to be provided in connection with the Proposed Use, which operational plan is summarized in the "***Operational Plan***" attached hereto as Exhibit B-2, and which security plan is summarized in the "***Security Plan***" attached hereto as Exhibit B-3 (collectively, the Building and Site Plans, Operational Plan, and Security Plan are hereafter referred to as the "***Plans***"); and

WHEREAS, the Applicant further testified that the Proposed Use will be licensed by the State of Illinois as provided in the Cannabis Regulation and Tax Act, 410 ILCS 705/1 *et seq.* (the "***Act***"), and regulations promulgated pursuant to the Act; and

WHEREAS, following the close of the public hearing, the PZC found that, subject to the terms and conditions of this Ordinance, the Proposed Use:

a. is desirable, at the proposed location, to provide a service or facility that will further the public convenience and general welfare;

b. will not be detrimental to area property values;

c. will comply with the zoning districts regulations;

d. will not negatively impact traffic circulation;

e. will not negatively impact public utilities or municipal service delivery systems;

f. will not negatively impact the environment or be unsightly;

g. will, to the extent practicable, preserve existing mature vegetation, and provide landscaping and architecture, which is aesthetically pleasing, compatible or complementary to surrounding properties and acceptable by community standard;

h. will meet requirements of all regulating governmental agencies;

i. will be subject to and required to conform to the conditions of this Ordinance; and

j. will be subject to and required to conform to the specific regulations for Cannabis Dispensaries under the UDO and City Code,

and based on such findings recommended approval of the SUP Relief; and

WHEREAS, following the close of the public hearing, the PZC also declined to recommend the Variation Relief; and

WHEREAS, the City Council, having considered the recommendations of the PZC and having further considered the Plans for the Proposed Use and other pertinent matters relating to the Requested Relief, accepted the findings of the PZC regarding the SUP Relief and made the

following additional findings regarding the Variation Relief in the context of, and subject to, the terms and conditions this Ordinance:

a. The Subject Property is surrounded by other properties zoned in the B-2 zoning district under the UDO;

b. The property lying northwest of, but not adjacent to the Subject Property is zoned in the City's M Manufacturing district under the UDO (the "***580 Tracy Parcel***");

c. The City's 2030 Comprehensive Land Use Plan identifies the Subject Property, the 580 Tracy Parcel and the properties surrounding the Subject Property as intended for commercial land uses;

d. The 580 Tracy Parcel is currently developed with a religious establishment;

e. Under the UDO, Cannabis Dispensaries are to maintain a 500-foot buffer between such dispensary and the nearest property line of a religious establishment;

f. The Subject Property is located approximately 350 feet from the 580 Tracy Parcel;

g. The building on the 580 Tracy Parcel is setback far from Tracy Trail, and as a result the building housing the religious establishment is located 697 feet from the building that would serve the Proposed Use;

h. Due to the pre-existing conditions and the general appropriateness of having Cannabis Dispensaries near other B-2 or more intensely zoned properties, the plight of the Applicant is due to unique circumstances;

i. Granting the Variation Relief will not alter the essential character of the locality;

j. The conditions upon which the Variation Relief is based would not be applicable generally to other property within the same zoning classification;

k. The difficulty or hardship underlying the Variation Relief has not been created by any person presently having interest in the Subject Property;

l. Granting of the Variation Relief will not be detrimental to the public welfare or injurious to other property or improvements in the neighborhood in which the Subject Property is located;

m. The Variation Relief will not impair an adequate supply of light or air to adjacent property, will not unreasonably diminish or impair the property values of adjacent property, will not unreasonably increase congestion in the public streets, substantially increase the danger of fire or otherwise endanger public safety;

and therefore further find and determine that, subject to the terms and conditions of this Ordinance, the Variation Relief satisfies the standards and conditions for approval under the UDO; and

WHEREAS, pursuant to the terms of the UDO and the City's home rule authority; the Mayor and City Council, having considered all the relevant facts and circumstances relating to the Requested Relief, the evidence and testimony presented, the findings and recommendations of the PZC, and the other relevant evidence and information available, have determined that it is in the best interests of the City and its residents to grant the Requested Relief, subject to the terms and conditions of this Ordinance;

NOW, THEREFORE, BE IT ORDAINED by the Mayor and City Council of the City of Crystal Lake, County of McHenry, State of Illinois, as follows:

SECTION 1: Incorporation of Recitals. The foregoing recitals are hereby incorporated into and made a part of this Ordinance as if fully set forth.

SECTION 2: Granting of SUP Relief. Subject to the limitations and the conditions set forth in Section 4 of this Ordinance, the City Council hereby grants the SUP Relief pursuant to the Plans, and, to the extent that the Final PUD plans for the Subject Property differ from the Plans, the Final PUD plans are hereby amended, and the Plans shall control.

SECTION 3: Granting of Variation Relief. Subject to the limitations and the conditions set forth in Section 4 of this Ordinance, the City Council hereby grants the Variation Relief pursuant to the Plans.

SECTION 4: Conditions on Approval. The Requested Relief granted pursuant to this Ordinance

shall be, and is hereby, conditioned upon and limited by the following conditions, the violation of any of which shall be deemed a violation of the UDO. Further, any violation of the terms of the following conditions or any other provision of this Ordinance shall authorize the City Council, without further public notice or hearing, to terminate the approvals granted in this Ordinance by adopting an ordinance terminating such approvals:

A. No Authorization of Work. This Ordinance does not authorize commencement of any work on the Subject Property. Except as otherwise specifically provided in writing in advance by the City, no work of any kind shall be commenced on the Subject Property pursuant to the approvals granted in this Ordinance except only after all permits, approvals, and other authorizations for such work have been properly applied for, paid for, and granted in accordance with applicable law.

B. Compliance with Plans; City Approval. The Proposed Use shall be located, installed, operated, and maintained in substantial conformity with the Plans attached to this Ordinance as Exhibits B-1, B-2, and B-3.

C. Compliance with Laws. Except as otherwise expressly provided in this Ordinance, the UDO and City Code and all other applicable ordinances and regulations of the City shall continue to apply to the Proposed Use and the Subject Property. The development and use of the Subject Property shall be in compliance with all laws and regulations of all other state and local governments and agencies having jurisdiction.

D. No On-Site Consumption. No consumption of cannabis or products that include cannabis (including cannabis-infused products) may be consumed on the Subject Property. The Applicant shall be required to patrol the Subject Property to ensure compliance with this provision.

E. Staffing; Coordination with Police Department. The Proposed Use shall limit the number of patrons within the "sales floor" portion of the building on the Subject Property to no more than the number of the Applicant's staff available on-site. In addition, the Applicant or Applicant's agents shall meet semi-annually with the Crystal Lake Police Department to review the Security Plan, which plan may be modified or supplemented by written order of the Police Chief in conjunction with such semi-annual meeting provided that such written orders are not inconsistent with or more restrictive than the Act and its attendant regulations.

F. On-Site Landscaping. Unless otherwise authorized in writing by the Director of Community Development of the City, prior to the commencement of operations of the Proposed Use, the Applicant shall cause any dead or missing landscaping

materials on the Subject Property (as set forth in the Final PUD Plan) to be replaced and to add additional landscaping along Pingree Road pursuant to a plan to be developed by Applicant and subject to the approval of the Director of Community Development.

G. No Drive-Through Operations. Unless otherwise approved by an ordinance of the City Council, no drive-through operations shall be permitted on the Subject Property.

H. Modification of the Plans; Interpretation. Except as otherwise provided in this Ordinance, no material modification to the Plans shall be permitted unless expressly approved by an ordinance of the City Council. To the extent that any provision of this Ordinance conflicts with the Plans, the City's Director of Community Development shall have the authority to determine which conflicting provisions shall apply so as to protect the health, safety, and welfare of the City and its residents most effectively.

I. Fees and Costs. The Applicant shall reimburse the City for all of its costs (including engineering, planning, and legal expenses) incurred in connection with the review, consideration, approval, or implementation of this Ordinance up to a maximum amount of $7,500.00. Any amount not paid within 60 days after delivery of a demand in writing for such payment shall, along with the interest and costs of collection, become a lien upon the Subject Property, and the City shall have the right to foreclose such lien in the name of the City as in the case of foreclosure of liens against real estate.

SECTION 5: Effective Date. This Ordinance shall be in full force and effect from and after its passage, approval, and publication in pamphlet form in the manner provided by law; provided, however, that this Ordinance shall be of no force or effect unless and until the Applicant has caused a duly authorized person to execute and thereafter file with the City its unconditional agreement and consent, in the form attached hereto as Exhibit C, and by this reference incorporated herein and made a part hereof; provided further that, if the Applicant does not so file the unconditional agreement and consent within 30 days following the passage of this Ordinance, the City Council may, in its discretion and without public notice or hearing, repeal this Ordinance and thereby revoke all approvals granted in this Ordinance. Upon this Ordinance having full force and effect, the City Clerk shall cause it to be recorded in the Office of the McHenry County, Illinois Recorder of Deeds. Upon Applicant's cessation of the Proposed Use on the Subject Property, the City shall,

upon request from the then title holder, provide a release of the obligations under this Ordinance within 30 days of such request.

PASSED THIS 19th DAY OF October, 2021.

AYES: 7

NAYS: 0

ABSTAIN: 0

ABSENT: 0

APPROVED at Crystal Lake, Illinois, this 19th day of October, 2021.

City of Crystal Lake, an
Illinois municipal corporation

Haig Haleblian, Mayor

SEAL

ATTEST:

Nick Kachiroubas, City Clerk

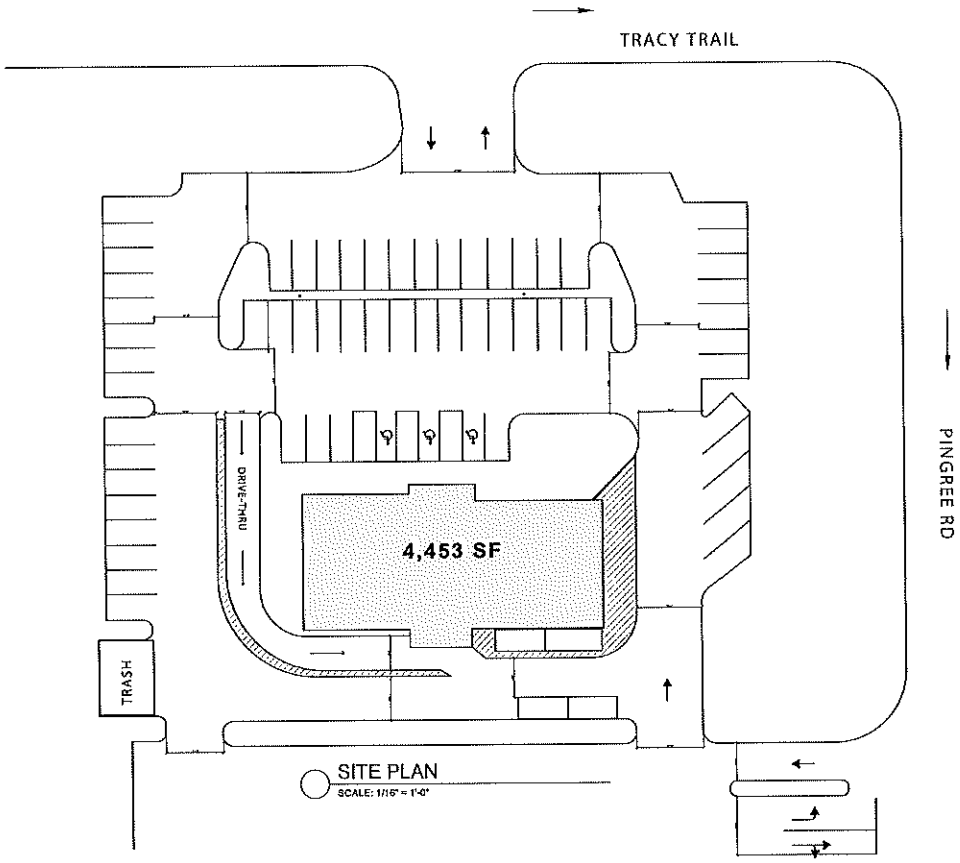
EXHIBIT A

Legal Description of the Subject Property

Lot 2 in AmCore Bank Subdivision, being a re-subdivision of Lot 1 in Crystal Lake Business Center Unit 2, being a Subdivision of that part of the East Half of Section 4, Township 43 North Range 8 East of the Third Principal Meridian and also a Subdivision of part of the Southeast Quarter of the Southeast Quarter of Section 4, Township 43 North, Range 8 East of the Third Principal Meridian, according to the Plat thereof recorded August 16, 1999 as Document No. 1999R0058147, in McHenry County, Illinois.

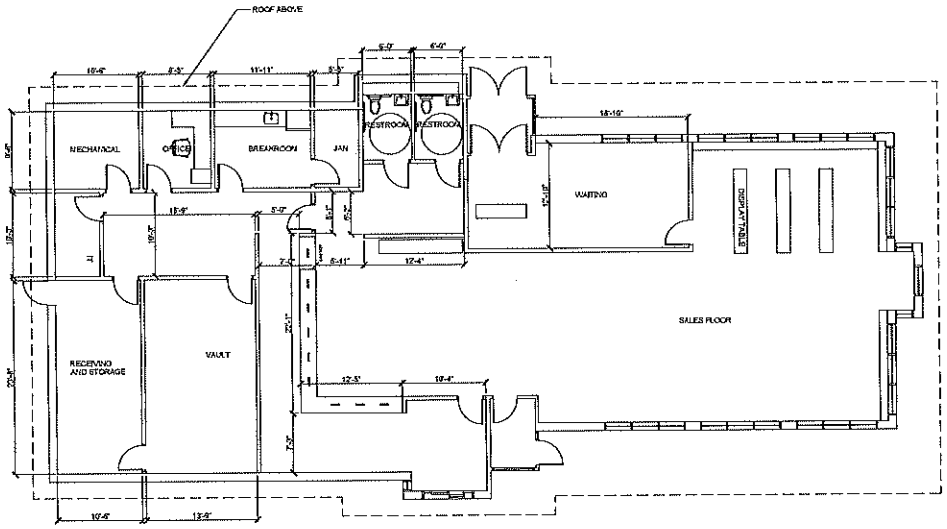
EXHIBIT B-1

Building and Site Plans



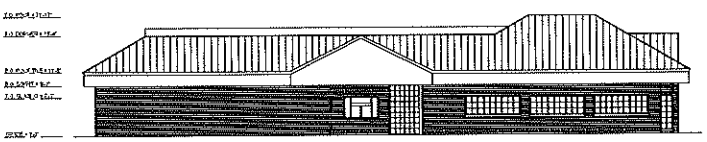
SITE PLAN
SCALE: 1/16" = 1'-0"

A-0

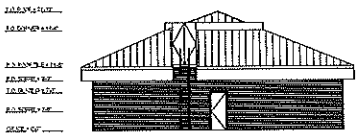


1 FLOOR PLAN
SCALE: 3/16" = 1'-0"

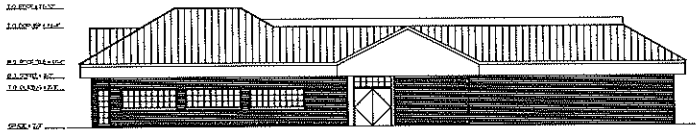
A-1



1 SOUTH ELEVATION
SCALE: 1/4" = 1'-0"



1 WEST ELEVATION
SCALE: 1/4" = 1'-0"



1 NORTH ELEVATION
SCALE: 1/4" = 1'-0"



1 EAST ELEVATION
SCALE: 1/4" = 1'-0"

CLIENT: [illegible]
PROJECT DESCRIPTION: CULTIVATION FACILITY
ADDRESS: [illegible]
BUILDING SCALE: 1/4" = 1'-0"
DRAWING SCALE: 1/4" = 1'-0"
BUILDING ELEVATIONS: NORTH, EAST, WEST AND SOUTH

A-2

EXHIBIT B-2

Operational Plan

EXHIBIT K

Americanna Dream's Operating Plan is the culmination of decades of management and operational experience in successful cannabis and similarly highly-regulated businesses, pulled together in one place. Drawn from real-world experiences and know-how, our Operating Plan—as detailed here and in our Standard Operating Procedures ("SOPs")—is also a living, breathing evolving document that our team of experts will update as new developments come online, the industry matures, and new technologies are introduced. Our Operating Plan provides an overview of our day-to-day dispensing, inventory, and cash handling practices, our staffing plan, and confirmation that 100% of our employees will be paid a living wage.

Our Operating Plan emphasizes 100% compliance with the Cannabis Regulation and Tax Act (the "Act"), administrative rules, and Illinois Department of Financial and Professional Regulation's ("Department") policy on the management and operation of adult use dispensing organizations. The Dispensary's Principal Officers and Dispensing Organization Agents ("agents") will comply with all written policies and procedures provided for in the Operations Plan.

HOURS OF OPERATION

The Dispensary's proposed initial hours of operation are as follows:

Monday:	9:00 a.m. - 9:00 p.m.
Tuesday:	9:00 a.m. - 9:00 p.m.
Wednesday:	9:00 a.m. - 9:00 p.m.
Thursday:	9:00 a.m. - 9:00 p.m.
Friday:	9:00 a.m. - 10:00 p.m.
Saturday:	9:00 a.m. - 10:00 p.m.
Sunday:	10:00 a.m. - 7:00p.m.

The Dispensary will post the hours in conspicuous locations, including at the entrance to the dispensary facility, in the Waiting Room, and in the Dispensing Area/Sales Floor. At no time will The Dispensary open before 6:00 a.m. or close after 10:00 p.m. The Dispensary will notify the Department if hours of operation change.

PROCEDURES FOR SAFELY DISPENSING CANNABIS TO QUALIFYING PURCHASERS

Dispensing Cannabis Protocols

Americanna Dream adheres to the best examples in Illinois' highly-regulated medical cannabis program for its dispensing protocols. The Dispensary uses the medical cannabis program as a model in operations and ensuring accurate dispensing to all purchasers. All agents are comprehensively and methodically trained to follow our check-in and verification SOPs requiring redundant review and verification of purchaser age upon arrival and again prior to any sale. This duplicative review and verification process includes authentication of government identification documents using an identification scanner to confirm: the validity of the ID card; confirmation the purchaser is 21 years of age or older; and that the person identified in the ID card is the person presenting the card. Agents are thoroughly trained on identification

authentication measures and provided with sophisticated identification verification equipment and written guidelines at each point-of-sale station on the authentication procedure.

Purchaser Check-in, sales and age verification policies and procedures

Waiting/Check-in

Access to The Dispensary during business hours begins by entering the man trap entrance door where a security guard/receptionist is stationed. Each individual will present a government-issued ID to the agent sitting at the reception desk at the time of entry while in the man trap.

The agent will review the government issued ID. A security agent will ask anyone who cannot present the required identification, who is under 21 or who is 21 or over and not engaged in learning about services offered by The Dispensary to leave The Dispensary vestibule immediately. Loitering or waiting for others with lawful identification is not allowed by The Dispensary.

The Dispensary only accepts identification documents that are government-issued and contain both an unobstructed photograph and date of birth. The document must be valid and unexpired, verified by careful review, including by the use of an identification scanner. Upon verification of the identification documents, a purchaser is granted access to the Waiting Room through a locked door from the vestibule; the purchaser will remain in the Waiting Room until called by an agent to enter the sales floor, i.e. the Limited Access Area.

Of note, during all hours, all entrances/exits to and from the dispensary facility are securely locked. Key cards are issued to agents, to access the dispensary facility. All interior doors also remain locked all hours of the day to control access to each segregated zone. Such doors can only be opened by authorized agents with key cards and will only remain open for the limited time necessary to allow entry or exit. Every door must be shut behind an agent to prevent unauthorized access.

Preventing Overflow/Overcrowding in Waiting Room

The agent at the reception desk will monitor the Waiting Room to prevent the Waiting Room from becoming unsafe, congested and/or overcrowded. Up to 25 persons are allowed in the Waiting Room at one time, and the reception agent will not allow any individual into the Waiting Room if the Waiting Room exceeds this limit or a limit imposed by the local fire code. The Dispensary will match purchasers 1-to-1 with agents before allowing anyone into the Limited Access Area.

Access to the Sales Floor – Limited Access Area Policies

Once approved for dispensation, the purchaser is invited by an agent through the single entry electronically-locked door and proceeds into the Sales Floor in the Limited Access Area. This facilitates security measures designed to protect the retail store, including monitoring access, managing flow, and mitigating the potential for diversion.

An agent will provide free consultation and/or education and assist the purchaser in choosing the correct forms, dosages, strains, etc., of cannabis products. Our priority is ensuring a positive experience at The Dispensary and safe consumption. The agent will help with correct dosing, an explanation of how to properly consume different types of cannabis products, selecting the right product for the purchaser's needs, and the amount to take to avoid overconsumption and a negative reaction. An agent will discuss the prohibitions on consumption in public, while driving, travelling across State lines and other safety concerns.

Sales Transactions

All sales agents will be standing at their point of sale station in the Restricted Access Area. Before an agent dispenses cannabis, the agent shall:

- Re-verify the identity and age of the purchaser; the ID must be valid, unexpired and contain a photograph and date of birth of the person;
- Scan the ID with Intellicheck to confirm validity;
- Offer appropriate purchaser education and support materials and notices;
- Enter and confirm the following information into our integrated point-of-sale system and the State's cannabis electronic verification system:
    - The agent's identification number;
    - The dispensing organization's identification number;
    - The amount, type (including strain, if applicable) of cannabis or cannabis-infused product dispensed; and
    - the date and time the cannabis was dispensed.
- Verify the total amount of cannabis in the purchase does not exceed the regulatory limit.
    - Illinois Resident - cumulative of the following:
        - 30 grams of cannabis flower;
        - No more than 500 milligrams of THC contained in cannabis-infused product; and
        - 5 grams of cannabis concentrate.
    - Non-Illinois Resident - cumulative of the following:
        - 15 grams of cannabis flower;
        - 2.5 grams of cannabis concentrate; and
        - 250 milligrams of THC contained in a cannabis-infused product.

Exit Bag

All purchases are placed in an unmarked opaque exit-package, and sealed prior to distribution. The exit package is resealable with a zipper/ slider, is compliant with child-resistant and light-resistant standards and meets the Consumer Product Safety Commission standards. Purchasers will be reminded not to consume cannabis on the premises or engage in behavior prohibited by the Act or The Dispensary's registration materials.

INVENTORY MANAGEMENT

An agent-in-charge will be present and in charge of dispensary management at all times. The Dispensary's agent-in-charge will have primary oversight over The Dispensary's cannabis

inventory verification system and its point-of-sale system. The Dispensary will use BioTrackTHC as its inventory verification and point-of-sale system.

BioTrackTHC enables users to track each cannabis product from the time the original plant was placed in a pot to the time the end product was sold to a purchaser. The software is designed to track every inventory action performed from cradle to grave, including all transactions by The Dispensary. The Dispensary has recall information, if needed, and to ensure a safe and robust chain of custody to prevent theft and diversion.

The Dispensary will coordinate and communicate with the Department to establish an account with the State's verification system. The Dispensary's BioTrackTHC system will share the following information with the Department:

- Each sales transaction at the time of sale and each day's beginning inventory, acquisitions, sales, disposal, and ending inventory.
- Acquisitions of cannabis and cannabis-infused products from a licensed adult use cultivation center, craft grower, infuser, or transporter, including:
    - a description of the products, including the quantity, strain, variety, and batch number of each product received;
    - the name and registry identification number of the licensed adult use cultivation center, craft grower, or infuser providing the cannabis and cannabis-infused products;
    - the name and registry identification number of the licensed adult use cultivation center, craft grower, infuser, or transportation agent delivering the cannabis;
    - the name and registry identification number of the agent receiving the cannabis; and
    - the date of acquisition.
- The disposal of cannabis, including:
    - a description of the products, including the quantity, strain, variety, batch number, and reason for the cannabis being disposed;
    - the method of disposal; and
    - the date and time of disposal.

Cannabis Delivery and Receiving Product

The Dispensary's agent-in-charge will receive cannabis products from the cultivation center's delivery truck in the Restricted Access Area during Business Hours. Upon notification that a transporting organization courier has arrived at the dispensary facility, the agent-in-charge will review and log the transportation agent's identification card and receive the cultivation center's delivery manifest from the transportation agent before allowing them to exit the vehicle. Upon verification, they have authority to enter the dispensary facility and deliver the cannabis. After removing the product from the vehicle, the delivery courier is escorted by security personnel into the receiving area. The transporting agent is buzzed into the mantrap Receiving Room while the vehicle driver remains with the vehicle. The vehicle, and all personnel within, is monitored by the security team via surveillance cameras during the entire delivery process. The agent-in-charge must oversee all receiving activities and ensure an uninterrupted chain of custody (this

must be recorded in BioTrackTHC). All receiving and product transfer procedures must be handled by the agent-in-charge and at least one other agent. All actions must be conducted under the video recording surveillance system.

The agent-in-charge receiving the products will immediately conducts a thorough product inspection and request that the transporting agent remain at the dispensary facility during the inspection.

If the information is accurate and acceptable, the agent-in-charge shall receive the inventory from the cultivation center into BioTrackTHC by scanning the barcode and accepting it in the point-of-sale software. Any discrepancy in weight, batch number, strain, or product type will trigger a warning in BioTrackTHC and the agent-in-charge can deny the product and return it to the transporting agent prior to accepting it into the system.

At the conclusion of the product inspection and delivery, the agent-in-charge will log and note any discrepancies in BioTrackTHC. The agent-in-charge will then sign the delivery manifest and have the transporting agents sign the manifest to confirm delivery. The agent-in-charge will then issue a compliant transaction receipt. No cash is exchanged during this process.

The agent-in-charge and a security guard will escort the transportation agent from the secure receiving area in the Restricted Access Area to their transport vehicle in the attached parking garage.

Avoiding Spoiled/Failed/Expired Product in Inventory

All cannabis products will carry a use-by date, indicating when the product is no longer suitable for sale. The agent-in-charge will check our inventory management system records daily by producing and reviewing an aging inventory report and remove and/or quarantines products whose suitability for sale is in question, including recalled product.

To avoid a situation where a product becomes outdated while in our possession, we will employ the First In, First Out ("FIFO") method of inventory management. Product already on hand is dispensed before more recently obtained product (of the same type from the same supplier). Our inventory management system will automatically notify the agent-in-charge when it is time to substitute new products for display purposes to avoid the potential for human error in this system.

Inventory Audits, Discrepancy Reporting

Prior to opening each morning, and following closing each evening, our Inventory Manager will conduct an audit to confirm physical inventory matches digital records. The audit is performed by running an inventory report in BioTrackTHC. The Inventory Manager will then compare the digital inventory reports by counting physical inventory on the shelf to ensure a match. A written record is created and maintained for each audit including the date, a summary of the findings, and the names and ID numbers of the agents conducting the review. All reports are recorded digitally and in hardcopy and are stored in perpetuity for analytics purposes. In addition, unannounced inventory audits are performed by the agent-in-charge at least twice monthly to ensure physical inventory matches digital records.

Cannabis Storage

Strict measures to control access to, and within, the Vault and other storage areas are a primary stopgap to prevent the unlawful diversion or theft of our cannabis inventory and to ensure the integrity and stability of our products. The Vault, and all other highly-sensitive Restrictive Access Areas ("RAAs"), are access-controlled using bio-metric access *and* swiped-card reader so only agents with proper credentials may enter. Agents will only be granted access to these RAAs depending on their specific job responsibilities and authorizations, and only for the minimum time necessary to perform their duties. Our access-control technology will keep a digital record in our electronic access control system of the dates/times and identities of those who entered the rooms for historical recordkeeping purpose. This is useful during an investigation of any actual or suspected security incident. This technology will guarantee absolute control over who may enter/exit RAAs at all times and we can update access-authorization remotely at a moment's notice.

Facility keys, entry cards, and key codes remain in the possession of designated authorized agents at all times while on the premises and may never be left unattended. Agents are trained to protect these critical items while at work, and are required to leave all access cards (other than an unmarked key to enter the front door at the commencement of their shifts, if necessary) in a special safe in the facility to protect them from loss or theft when agents are away from work. Upon separation from The Dispensary, former agents must return their keys and entry cards; key codes and the access-clearance level on their entry cards will be wiped by Security.

All storage areas are highly secured, independently-alarmed RAAs. The entirety of these storage areas is recorded 24/7 by our comprehensive continuously-recording video surveillance system that will be monitored by onsite security *and* our third-party commercial security monitoring service provider. Our surveillance system also facilitates the close monitoring of product shipment/receiving activities, product transfer procedures, inventory stocking and storage activities, inventory audit procedures, and all activities taking place in proximity to our storage areas given the anticipated full security coverage of our premises.

Cash Handling and Bank Deposits

Appropriate cash handling and bank deposit procedures are integral to the safe operation of a dispensary. The Dispensary has developed an efficient cash handling and deposits plan to ensure all cash received from purchasers is tracked, monitored, and secured. Only agents-in-charge will have access to and distribute the cash in the cash safe portion of the secured Vault.

Bank Deposits

The Dispensary has entered into a contract with a licensed and insured Department-approved secure cash transport company to perform regular (at least twice weekly) cash pickups from the dispensary facility. The Dispensary's Principal Officers have also already secured a banking relationship with an Illinois-based institution which will bank cash from The Dispensary.

STAFFING PLAN

Our experienced ownership and management teams understand that employees are a business's most important asset and are the key to operational success. The Dispensary has gone to great lengths to develop a Staffing Plan geared toward acquiring top talent while at the same time supporting our core mission of helping economically disadvantaged individuals in communities at risk achieve the American Dream by compliant and lawful participation in the legal cannabis industry.

Hiring Practices Generally

All prospective agents are screened during the application, interview, and hiring processes to ensure they meet the requirements set by local and State regulations and our own stringent internal standards for qualifications, experience, character, and professionalism. This includes a thorough background screening and criminal history record check exceeding the mandates of State law. Our hiring plan includes a job description for each position in The Dispensary's structure, the desired level of education, training, core competencies, and experience required to fill each position while staying true to our social equity mission and diversity in hiring. All agents must be at least 21 years of age and meet all local and State requirements prior to commencing work, including obtaining valid agent registration by the Department. Any agent with a disqualifying felony conviction or other disqualifying criminal offense, including but not limited to a drug-related misdemeanor offense within the five-year period before the date of application or a felony offense, will be terminated.

Once hired, The Dispensary's Human Resources Department ("HR") will create and maintain personnel records in compliance with the Act, which will be retained for at least 7 years from the date of termination/separation or longer if we are given notice of a pending criminal, civil or administrative investigation, or other legal proceeding for which the records may contain relevant information. Such records shall include, at a minimum:

- Recruiting and screening documents, such as the job application and resume;
- Job descriptions;
- Records related to job offers, promotion, demotion, layoff, education/training, etc.;
- Records related to other employment practices, such as policy acknowledgments and agreements and signed Code of Conduct;
- Letters of recognition;
- Warnings, counseling, and disciplinary notices;
- Performance evaluation and goal-setting records;
- Termination records; and
- References and background checks.

Initially, we anticipate hiring the following staff positions *in addition to executive officers*:

INITIAL STAFFING PLAN	
Position	**No. of Employees**
Security Guards	4
Chief Security Officer	1
Security Manager	1
Diversity Coordinator	1
Chief Compliance Officer	1
Training Coordinator	1
General Manager	1
Inventory Manager	1
Assistant General Managers	2
Purchaser Care Associates	12
Controller	1
Recordkeeping Coordinator	1
QA Manager/Recall Coordinator	1
Community Outreach Coordinator	1
Medical Director	1
Total	**30**

Organizational Part and Key Operations Positions

The Dispensary is managed by a suite of passionate, highly-competent business, industry, and community leaders. We are committed to the structure of the adult use program including 100% regulatory compliance, safe and accurate dispensing, security and recordkeeping while guaranteeing our initial and continued operations support our social equity mission, vision, and values.

General Manager/Agent-in-Charge

Intent on securing the best and brightest employees for a safe, compliant, secure, and well-run dispensary organization, The Dispensary's proposed initial agent-in-charge is an individual who is one of the most experienced and well-traveled dispensary managers the cannabis industry has to offer.

Job Summary: Full-time agent who will supervise, manage, and perform tasks related to inventory, security, and sales staff while working closing with the training and compliance teams to impart best practices. Has primary responsibility for our inventory verification and point-of-sales systems, confirming inventory always matches the State's verification system.

Responsibilities:

1. Oversee Operations Plan, including the management of security, inventory, sales and retail agents, recordkeeping maintenance/protection of confidential information, safe handling of inventory.
2. Primary responsibility and oversight for inventory verification and point-of-sales systems, verifying our inventory matches the State's verification system.
3. Communicate with representatives of BioTrackTHC and our point-of-sale system provider on technology updates, issues or concerns.
4. Oversee product ordering, coordinating with the Inventory Manager.
5. Oversee and conduct opening/closing procedures, including verifying alarms are on locked doors and conducting perimeter checks.
6. Check emails, voicemails, customer comments.
7. Create and manage schedules for employees and deliveries.
8. Prepare and assign daily tasks to the Assistant Managers and Customer Care Associates.
9. Observe agents to create a safe, secure, and high-functioning work environment.
10. Conduct monthly, unannounced legal and operational compliance audits.
11. Coordinate with the compliance/quality control teams to ensure a consistent purchaser experience.
12. Confirm agents are properly vetted before hiring, and trained prior to commencing work.
13. Coordinate with the Training Coordinator (the "TC") to provide training on retail and other operational matters.
14. Routinely and regularly inspect facility for signs of disrepair, infection, disease, and other problems that may affect ideal sanitary conditions.
15. Perform extra duties based on the needs of the organization.
16. Hold and maintain a Department issued agent ID card.
17. Oversee cannabis delivery receiving and acceptance procedures.
18. Communicate with the Department to provide prompt notice that an agent is no longer employed and promptly notify a report of loss or theft of cannabis from The Dispensary.

Chief Security Officer – Principal Officer

Given the critical nature of security operations, The Dispensary has hired a qualified and highly experienced individual to fill this position. Our Chief Security Officer ("CSO") is the Owner and Managing Partner of a Department-licensed security company which has provided security services to licensed medical cannabis dispensaries under Illinois's Medical Cannabis Pilot Program since 2014. He will engage day-to-day leadership and general management of the Company, while implementing the most updated, highly effective security solutions. Prior to starting his company, our CSO was a member of the United States Marshal's Service for 23 years, retiring as a Supervisory Inspector where he managed Task Force operations covering 3 States. Our CSO has extensive experience in security training and the design and implementation of robust security policies. For 10 years, our CSO managed a state-of-the-art Regional Security Training Center that provided over 150 unique trainings to 1,500 students annually. In fact, our CSO designed several major government security training facilities, developed the curriculum,

supervised a cadre of instructors, and created the comprehensive safety and security plans for each.

Job Summary: Manage and direct security personnel in developing, implementing, and maintaining security plans, processes, systems, policies, and procedures across the organization to reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.

Responsibilities:

1. Establish appropriate standards and risk controls associated with the physical property, cannabis products, and electronic records.
2. Act as liaison to the Department of State Police, the Department, emergency responders and local police departments as appropriate.
3. Investigate incidents regarding the physical property, cannabis products, and/or records.
4. Coordinate with the TC to develop and conduct comprehensive security training for all personnel, with additional training for Security Guards and other security personnel.
5. Oversee the staffing, scheduling, and operations of The Dispensary's security team and system.

Chief Compliance Officer – Principal Officer

Maintaining a compliant dispensary is integral to our long-term success. As such, when selecting a Chief Compliance Officer, The Dispensary went to great lengths to find an individual with an extensive track record in compliance, highly-attuned management skills, and experience working at the highest levels of regulatory governance in the cannabis industry.

Job Summary: Oversee all regulatory and compliance activities, including liaising with the Department, providing independent oversight of operations, and reporting to The Dispensary's Board.

Responsibilities:

1. Ensure ongoing compliance with all applicable State, county, and municipal laws, ordinances, and regulations.
2. Draft, review, and file legal and regulatory documents and reports, including license-related activities, business tax registrations, and local zoning/use permits.
3. Provide support and organization for recurring operational reports to the Department and renewal of all applicable licenses/registrations/permits.
4. Monitor changes to all applicable dispensary laws, regulations, and ordinances and to the cannabis industry more broadly.
5. Conduct quarterly compliance audits (directly and with the assistance of outside/independent regulatory counsel).
6. Coordinate with the TC to develop and conduct comprehensive legal and personnel compliance training, with supplemental training for members of the compliance team (i.e., the Recordkeeping Coordinator and the Quality Assurance Manager).
7. Liaise with regulators, law enforcement, and government agencies on all compliance-related matters.
8. Supervise and oversee The Dispensary's compliance team, including the Medical Director and Recordkeeping Coordinator.

Medical Director - Agent

The Dispensary will be a clean, sanitary, and professional state-of-the-art dispensary facility reminiscent of a high-end retail pharmacy. To ensure our facility and agents meet our high expectations, The Dispensary has retained a Medical Director, who has worked for years in the medical cannabis industry in Illinois and is a renowned expert on cannabinoid pharmacology and drug interactions.

Job Summary: Design and oversee the implementation of our medical-focused purchaser education materials and agent training. Supervise and organize related training for agents. Coordinate responses to purchaser questions and create reports for management review. This position reports to the Chief Compliance Officer.

Responsibilities:

1. Conduct onsite, real-time operational inspections to ensure best practices.
2. Establish and implement policies and procedures relating to medically-sound best practices, adjusted accordingly to an adult-use dispensary setting.
3. Maintain extensive knowledge of dispensing in hospital/pharmacy settings to inform best cannabis dispensing practices.
4. Ensure all agent training materials, handbooks, SOPs, are up-to-date with the latest information and policies and procedures to achieve the Company's stated goals.
5. Coordinate responses to purchaser questions on cannabis use.

Assistant Managers

Assistant Managers ("AM") assist the agent-in-charge on all retail-oriented tasks, including managing our Customer Care Associates ("CCAs"). We will ensure that an AM is onsite during each shift. The Dispensary has also identified as its initial proposed AM an individual who has managed a medical cannabis dispensary licensed under Illinois's Medical Cannabis Pilot Program. He will leverage his years in the cannabis industry to ensure The Dispensary and its agents maintain compliant and successful operations.

Job Summary: Perform tasks based on the schedule provided by the agent-in-charge. Apply knowledge of retail best practices. Act in supervisory role with regards to CCAs.

Responsibilities:

1. Assist the agent-in-charge and CCAs in all aspects associated with safe and accurate dispensing.
2. Consult with purchasers based on need and facilitate product selection, strain selection, and/or route of administration selection when appropriate.
3. Offer educational information and documentation on available products and the adult use program in general, including: (a) coordinating with the TC to develop and provide training to other agents on retail operations topics; (b) assisting in the development and implementation of review and improvement processes for purchaser education and support; and (c) providing oversight for the development and dissemination of educational materials for purchasers and systems for documentation by purchasers of product and dispensary experience feedback.
4. Identify any potential purchaser substance abuse issues or violations of program regulations, including oversight for the development and dissemination of policies and procedures for refusing service to someone impaired by or abusing cannabis.
5. Maintain, clean, and disinfect the facility.
6. Ensure proper recording of purchaser transactions and proper inventory tracking.
7. Ensure inventory records are timely submitted to the Recordkeeping Coordinator.

8. Perform additional tasks as may be required by the agent-in-charge.

Customer Care Associates

As the frontline between The Dispensary and its purchasers, The Dispensary is committed to hiring talented, knowledgeable, and responsible Customer Care Associates ("CCAs"), and training our CCAs in accordance with our robust Education and Training Program.

Job Summary: Perform tasks based on the schedule provided by the General Manager/agent-in-charge and AMs. Apply knowledge of dispensary and retail-pharmacy best practices. Reports to the AMs.

Responsibilities:

1. Assist the agent-in-charge in all aspects associated with safely and lawfully dispensing.
2. Assist purchasers based on need.
3. Offer educational information and documentation on available products and the adult use program in general.
4. Identify any potential purchaser substance abuse issues or violations of law or regulations.
5. Maintain, clean, and disinfect facility and assist with inventory stocking responsibilities.
6. Record purchaser transactions and ensure proper inventory tracking.
7. Maintain comprehensive knowledge of available products, cannabis history and usage, cannabis pharmacology, the Act, and applicable laws and rules regarding cannabis possession, storage, and consumption.
8. Perform additional tasks as may be required by the agent-in-charge and AMs.

Staffing Continuity Plan

It is our goal cross-train our agents to quickly respond to possible changes in labor demand within our different departments. In the cannabis industry, it is a common difficulty to find experienced, trustworthy, and reliable employees, especially on short notice. In order to mitigate possible imbalances of allocation of labor in our systematic processes due to agent termination, resignation, illness, death, or any other reason, we will cross-train all agents as soon as practical.

EXHIBIT B-3

Security Plan

[redacted]

AMERICANNA DREAM

Security Plan

Prepared by:

SILVER STAR PROTECTION GROUP

[redacted]

Client Name	Americanna Dream
Location	501 Pingree Road, Crystal Lake, IL 60014
Date Created/Updated	12/20/2020

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Dispensary Security Operations:

Americanna Dream has contracted Silver Star Protection Group LLC (a licensed security company under section 5 Private Detective, Private Security, Private Alarm, Fingerprint Vendor, Locksmith act of 2004). Silver Star Protection Group (SSPG) will work with Americanna Dream dispensary facility management to ensure that a visible and consistent security presence is established in all areas of the dispensary facility. SSPG security professional's goal is to create a safe and secure environment to dispense Cannabis. SSPG security professionals are public relations ambassadors for Americanna Dream and will provide the customer with the optimal experience while in the facility.

Location: Americanna Dream: 501 Pingree Road, Crystal Lake, IL 60014.

Security Officer Scope of Work:

Time	Duties
Pre-opening procedures	1. Prior to entry, conduct a security sweep of the entire perimeter to identify any potential security threats, vulnerabilities and/or suspicious persons or activities. 2. Enter the facility, disable the alarm. 3. Conduct a security sweep of the interior of the facility. 4. Once facility is clear, allow employees to enter. 5. Complete dispensary opening checklist. 6. Ensure all security components and systems are functioning properly. 7. Review daily logbook for notes from the previous day's activities.
Daily Operations	1. Provide exceptional customer service to all patrons and employees. 2. Ensure the safe dispensing of cannabis. 3. Control access to the facility. 4. Ensure all individuals granted access provide proper identification and have a legal right to enter. 5. Conduct random patrols – ensure facility is secure. 6. Monitor the CCTV system. 7. Investigate suspicious activity. 8. Resolve incidents. 9. Thoroughly document incidents. 10. Assist law enforcement and Government Agencies with all lawful requests. 11. Ensure Americanna Dream has achieved all State and IDFPR requirements to lawfully operate cannabis dispensary.
Closing the Facility	1. Ensure all patrons have exited the facility and safely left the premises. 2. Assist employees exit the facility and safely leave the premises. 3. Conduct a security sweep of the interior and ensure the facility is secured for overnight close. 4. Set the alarm and lock the front entrance upon exit. 5. Conduct a security sweep of the entire exterior of the facility to identify any potential security threats, vulnerabilities and/or suspicious persons or activities.

[redacted]

Facility Hours of Operation (Hours may vary):

Day	Hours
Monday	9:00 a.m. to 9:00 p.m.
Tuesday	9:00 a.m. to 9:00 p.m.
Wednesday	9:00 a.m. to 9:00 p.m.
Thursday	9:00 a.m. to 9:00 p.m.
Friday	9:00 a.m. to 10:00 p.m.
Saturday	9:00 a.m. to 10:00 p.m.
Sunday	10:00 a.m. to 7:00 p.m.

The facility will have at least one SSPG security professional (officer) during all hours of operation.

Security Objectives:

Americanna Dream Dispensaries primary security objectives are to:

1. Ensure the safe and efficient dispensing of cannabis.
2. Ensure compliance will all lawful requirements to operate a cannabis dispensary.
3. Prevent theft, loss and diversion.
4. Proactively identify and resolve threats before they arise.

Objectives will be achieved through the following security measures:

1. Access control – preventing security threats from entering the dispensing organization.
2. Identifying and documenting all individuals entering the facility.
3. Screening individuals entering the facility with state calibrated ID scanner.
4. Video monitoring and random patrols.
5. Liaison with local law enforcement to become continuously apprised of criminal activity and potential threats in the community.
6. Conduct semi-annual compliance assessments to ensure the dispensing organization in operating within the federal and state mandated guidelines.

Americanna Dream's Dispensary staff and SSPG will periodically review and update this security plan to ensure they remain current and conform to all mandates and future requirements in this evolving industry. Americanna Dream will conduct a security plan review annually.
All revisions to the security plan will be approved by the Department prior to implementation.

SSPG Security Officer Professional Requirements:

Employee Appearance:

a. Uniform:
    i. All SSPG employees must present a neat, clean and professional appearance to include, but not limited to, a clean, pressed uniform.
b. Hair:

[redacted]

i. For male employees: Facial hair will be neatly trimmed and limited to ½ inch in length. Hair will not extend beyond the bottom of the collar. When in uniform, male employees will ensure their hair is cut or styled so that when standing, looking straight ahead, the hair does not extend below the middle of the ear on the sides or below the top of the collar on the back. Depth of hair will not exceed two (2) inches at any point. The hair will present a tapered appearance on the sides and back of the head. For female employees, ponytails are authorized, but not recommended. Any hairstyle will allow for proper hat wear.

c. Jewelry:
   i. Employees may wear jewelry, which is conservative and in good taste, provided the item does not jeopardize safety of the members or other members. Extremely large or gaudy rings, jewelry items and ear cuffs are prohibited. Female employees in uniform may not wear more than two pairs of earrings. Earring may not hang below the ear and should be stud type to prevent being ripped from the ear. Male uniform members are prohibited from wearing earrings.
d. Body Piercing:
   i. Employees are prohibited from wearing any other form of visible body piercing items or other visible jewelry to include tongue piercings. All jewelry items worn with the uniform must be conservative and in good taste.
e. Body art:
   i. Body art is defined as procedures used to alter the body's appearance such as branding, scarification, tongue splitting or tattoos. Employees in uniform having body art on their arms will cover the body art while on duty by covering their arms with a long sleeve uniform shirt.
f. Management will be the final judge of whether an employee's personal appearance is acceptable for duty.
g. Employees appearing in their official capacity in court shall appear in the regulation uniform or acceptable business attire.

Mandatory SSPG Security Personnel Equipment:

a. SSPG Employee ID.
b. Permanent Employee Registration Card (PERC).
c. Firearm Control Card (FCC) (Formally known as TAN card).
d. FOID Card.
h. Concealed carry permit (if applicable).
i. SSPG security attire (polo shirt and tan 5.11's pants).
j. Fully charged radio.
k. All assigned duty gear.

Code of Conduct:

COURTESY

Employees, when dealing with the public and each other shall be patient, courteous, and respectful. They will not engage in argumentative discussions even in the face of extreme provocation. In the performance of their duties, employees shall not use coarse, violent, profane, vulgar, sarcastic or insolent language or gestures and will not express any prejudice, hostility or bias concerning race, religion politics, national origin, gender, sexual orientation, social background, or similar personal characteristics.

CONFIDENTIALITY

Our clients have the right to their security and privacy, and information obtained about them must not be improperly divulged. Employees shall treat the official business of the company as confidential. Information regarding official business shall be disseminated only to those for whom it is intended, in accordance with law and established company procedures. Employees shall not divulge the identity of persons giving confidential information except as authorized by proper authority.

Prompt

SSPG Security Professionals will report for duty on time and be ready to provide optimal service. SSPG Security Professionals will promptly respond to all incidents and requests.

Professional

SSPG Security Professionals will comport themselves in a professional manner at all times. SSPG Security Professionals are perceived as the face of the organizations and are responsible for providing patrons with the optimal customer experience.

Dispensary Opening and Closing Procedures:

Dispensary Opening Procedures:

1. Arrival at location:
   - SSPG security professionals shave arrive:
     - On time.
     - In uniform.
     - With all assigned duty gear.

   Conduct a security sweep of the entire perimeter:
   - Identify and potential threats or suspicious persons, vehicles or circumstances. Once the perimeter is cleared, proceed into the dispensary facility.
   - Determine if any access points have been breached or tampered with.
2. Entry to the facility:
   - Deactivate the alarm.
   - If the alarm is not on or activated upon entry, do not allow employees to enter the building.
   - Contact law enforcement as needed.
3. Conduct a security sweep of the interior of the dispensary facility.
   Ensure there are no:
   - Open or breached doors, windows or access points.
   - Ensure there are no unauthorized personnel in the facility.
   - Ensure all cash and cannabis storage containers are locked, secure and have not been tampered with.
   - Once the facility is cleared allow employees to enter the facility.
4. Employee entry:
   - Ensure all employees swipe into the Electronic Access Control System as they enter into the facility to document all employees on premises. Tailgating is prohibited.
   - Ensure all employees are displaying a valid State of Illinois Agent Identification Card.
   - Ensure there are a minimum of two dispensary employees to open the facility.
5. Systems check:
   Perform a systems check to verify the following systems are fully functioning and operational: (If any of the systems are not operational, DO NOT OPEN THE FACILITY).

- Electronically Engineered Access Control System (EEACS).
- Video Surveillance System;
    - Ensure surveillance system is available for "live viewing" by the State, the Department, ISP and local law enforcement.
    - Ensure all video is being recorded both on and off site.
    - Ensure all cameras are correctly adjusted.
- Alarm System.
- Point of Sale System / State-Wide Verification System.
- Lighting System.
- Inventory Management System
- If the EEACS, video surveillance system, video surveillance equipment, point of sale system, state verification system or Illinois cannabis tacking system are not functioning, do not open the facility.

Opening the facility:

1. Complete "Dispensary Opening Checklist" to ensure all State of Illinois requirements are met for operating a cannabis dispensary.
2. Dispensaries can only operate between the hours of 6AM to 10PM.
    a. Ensure facility is not open before 6AM or after 10PM.
3. Open the dispensary at the direction of the DAIC.
4. Conduct a security sweep of the exterior of the dispensary facility via the video surveillance system prior to opening the front door.
5. Open the front door and greet and assist customers as needed.

Dispensary Closing Procedures:

1. Conduct a security sweep of the entire interior of the dispensary ensuring:
    - All customers and service providers have safely exited the facility.
    - All access points are secure and locked:
        - Doors
        - Windows
        - Gates
2. Ensure all cannabis and currency in the dispensary are locked in the vault.
3. Preform a system check and ensure all components of the security system are functioning properly.
4. Perform a system check to verify the following systems are fully functioning and operational: (If any of the systems are not operational, DO NOT CLOSE THE FACILITY).
    - Electronic Access Control System.
    - Video Surveillance System.
        - Ensure it is available for "live viewing" by the State, the Department, ISP, and local law enforcement.
        - Ensure all video is being recorded both on and off site.
        - Ensure all cameras are correctly adjusted.
    - Alarm System.
    - Point of Sale System.
    - Lighting System.
    - If any of the systems are not functioning, notify the dispensary-agent-in-charge (DAIC). Contact service providers as directed by the DAIC.

5. Ensure the end of business day inventory is conducted:
    - At the conclusion of daily business, the dispensary agent-in-charge or designee will verify the electronic inventory matches the inventory on hand in the dispensary.
    - Name and registration identification number of dispensary organization agent conducting the inventory verification will be entered into the electronic inventory.
6. Utilizing the video monitoring system conduct a security sweep of the exterior of the facility to make sure it is safe to exit.
7. Set the alarm.
8. Walk out with the dispensary employees and ensure they get to their vehicles safely.

Daily Facility Operations:

Purchaser Access:

1. SSPG security professionals will control the ingress and egress of all personnel in the dispensary facility.
    a. All qualifying purchasers/visitors will be required to enter the dispensary facility through the front entrance.
    b. Prior to entry, qualifying purchasers/visitors will be required to remove any items that would obstructthe identity of an individual (some examples are hat, glasses, hoods, gloves etc.).
    c. Any individual who refuses to remove such items will not be granted access to the dispensary facility.
    d. Refusals will then be documented in the incident log. SSPG and the Dispensary Agent in Charge will forward all refusals that arise to the level of potential criminal activity to the Division, Department, ISP and local authorities.
2. Purchaser Screening
    a. Prior to a potential purchaser entering the dispensary facility, a security professional will verify the age of the purchaser by checking a government issued card by use of an electronic reader or electronic scanning device to scan a purchaser's government issued identification, if applicable to determine purchaser's age and the validity of the individual's government-issued identification card.
    b. The identification card must be valid, unexpired, and contain a photograph and the date of birth of the person.
    c. Americanna Dream will refuse to sell cannabis or cannabis infused products to any person unless the person produces a valid identification card showing the person is 21 years of age or older.
    d. Security officers will work in concert with dispensary staff to ensure all purchases are compliant with purchase limits.
    e. Additionally, employees will receive training on validating government-issued identification and be familiarized with Illinois and surrounding states forms of identification, government issued IDs, and passports.
    f. After the scanning of an ID, if there are any questions to the validity of identification or purchaser's age, the individual will be brought to the attention of the security manager or AIC for further inquiry.
    g. Patrons who do not possess the above documentation will not be granted entry.
    h. Americanna Dream will accept the following forms of unexpired, government-issued identification:
        - Valid, unexpired, state-issued driver's license.
        - Valid, unexpired, state-issued state identification card.
        - Valid, unexpired, state-issued Illinois FOID card
        - Valid, unexpired, government-issued military ID
    i. AMERICANNA DREAM is a licensed recreational, adult use cannabis dispensary. AMERICANNA DREAM will not sell cannabis or cannabis-infused products to a person who is under 21 years of age.
    j. Americanna Dream will not retain, use, share or disclose any identifying or personal information of a

purchaser obtained or received in accordance with this Section.

k. Adequate written evidence of age and identity of the person is a document issued by a federal, State, county, or municipal government, or subdivision or agency thereof, including, but not limited to, a motor vehicle operator's license, a registration certificate issued under the Military Selective Service Act, or an identification card issued to a member of the Armed Forces.

l. Patrons that do not possess the above documentation will not be granted entry.

3. Americanna Dream will ensure purchasers do not loiter or exceed facility occupancy requirements.
4. AMERICANNA DREAM will restrict purchaser movement to the "Public Access Area" or "Limited Access Area" of the dispensary.
5. Public/Limited access areas are:
    a. Parking lot.
    b. Front entrance.
    c. Waiting area.
    d. Point of sale area.
    e. Bathrooms.
6. Americanna Dream will ensure purchasers do not consume cannabis on the dispensary premises.
    a. SSPG will ask any patron that attempts to consume or consumes cannabis on the premises to immediately leave.
    b. SSPG will fully document all consumption incidents:
        i. Notify the DAIC.
        ii. Create an incident report.
        iii. Retain all surveillance video of the incident.
        iv. Retain all POS transaction information.
7. Provided security for patrons as they walk to their vehicles (as needed).
    a. Monitor customers as they walk to their vehicles via the video surveillance system.
    b. Walk the patron to the vehicle upon request.
8. SPG employees will provide all patrons with the optimal customer experience to ensure complete satisfaction.

<u>Customer Management/Patient Flow Plan:</u>

1. Americanna Dream is committed to providing purchasers with the optimal customer experience. To achieve this, Americanna Dream will employ a customer management plan to maximize efficiency, purchaser flow and increase the customer experience.
2. The maximum occupancy rate for AMERICANNA DREAM is TBD.
3. Security personnel at the front entrance will track and control the patron flow in the facility. The maximum capacity for the facility will be determined by the number of sales associates in the sale area and available purchaser accommodations in the waiting area.
4. As the sales area reaches maximum capacity, customers remain in the waiting area until sales associates become available.
5. Arriving purchasers will then be issued a sequential number and be required to wait in the purchaser waiting area.
6. The security professional will monitor the CCTV and communicate via radio with dispensary staff to determine the capacity of the sales area of the dispensary.
7. As purchasers in the dispensary leave and dispensary agents and/or point-of-sale counters become available, the security professionals will direct purchasers in the waiting area into the dispensary.
8. To ensure the safe and orderly servicing of customers, purchasers will be granted access to the dispensary in the order they arrived as verified by their issued sequential customer number.

9. The Applicant will ensure customers do not loiter and complete transactions in a timely fashion. Those individuals not engaging in permitted acts will be required to leave the premises
10. For guest safety, SSPG will use the video surveillance system to monitor purchasers as they leave the dispensary and/or walk the patron to their vehicle upon request.

Employee Access:

a. Employees will enter the dispensary location through the front entrance and pass through the front door.
b. All principal officers, agents-in-charge and employees of the dispensing organization are dispensing organization agents and will have a valid agent identification card.
c. All employees must possess and prominently display (clearly visible) a valid State of Illinois issued Registered Agent Identification Card at all times.
    i. Employees who do not possess a valid Registered Agent Identification Card will not be allowed to work in the dispensary facility.
d. Each AMERICANNA DREAM dispensing organization agent is only required to hold one card for the same employer AMERICANNA DREAM regardless of what type of dispensing organization license the employer holds.
e. Employees are required to "swipe in" to the Electronic Access Control System upon arrival and departure. Tailgating is prohibited.

Employee Training:

1. Americanna Dream employee training plan will ensure:
    a. That employees will understand the rules, regulations and laws that must be followed by dispensary employees.
    b. Employees have knowledge of any security measures and operating procedures of the dispensary.
    c. Employees are able to advise purchasers on how to safely consume cannabis and use individual products offered by the dispensary.
2. "Responsible Vendor Training Program"
    a. Americanna Dream will ensure all owners, managers, employees, and agents involved in the handling or sale of cannabis or cannabis-infused product employed by the dispensary will successfully complete state mandated Responsible Vendor Training Program within 90 days of being hired.
    b. Annually thereafter, each owner, manager, employee, and agent of Americanna Dream will successfully complete the Responsible Vendor Training Program by a state approved provider.
    c. Upon the successful completion of the Responsible Vendor Program, the provider shall deliver proof of completion either through mail or electronic communication to the dispensing organization, which shall retain a copy of the certificate.
    d. All "Responsible Vendor Training" will be conducted by a Department approved vendor.
    e. The Responsible Vendor Training program will be completed annually by all employees.
    f. Employees who are not current with their "Responsible Vendor Training" will be prohibited from working in the Dispensary until they become compliant.
3. Americanna Dream's Training Program will include:
    a. How to effectively operate the point-of-sale system and the State's verification system.
    b. Proper inventory handling and tracking.
    c. Specific uses of cannabis or cannabis-infused products.
    d. Instruction regarding regulatory inspection preparedness and law enforcement interaction.
    e. Awareness of the legal requirements for maintaining status as an agent.
    f. Cash handling.
    g. Active shooter and emergency response procedures.
    h. And other topics as specified by the dispensing organization or the Department.
    i. Americanna Dream will maintain evidence of all training provided to each agent in its files that is subject to inspection and audit by the Department.

[redacted]

j. Americanna Dream will ensure employees/agents receive a minimum of 8 hours of training subject to the requirements in subsection of Section 15-40 annually, unless otherwise approved by the Department.

4. Prior to employment all Americanna Dream will obtain a signed statement from each dispensing organization agent stating he/she will not steal or divert any cannabis.
5. Americanna Dream will conduct organizational specific training ensuring all employees provide qualifying purchasers with exemplary service.

Lost or Stolen Facility Access / Illinois Agent Identification Card:

a. Employees must notify the dispensary organization immediately upon becoming aware that their agent identification card has been lost, stolen or destroyed. Employees will report the loss directly to the DAIC and SSPG Security Officer.
b. The dispensary organization will then report the lost card to the Illinois State Police and the Department immediately upon discovery of the loss.
c. All access privileges for the employee will be suspended immediately.
d. The Dispensary Employee will immediately file a report of the lost identification with local law enforcement.
e. The DAIC will notify the Department of Financial and Professional Regulation of the lost identification card and send the employee a copy of the police report filed with the local police department.
f. SSPG will initiate an investigation to determine the cause of the lost or stolen identification and the responsible party, if applicable.
g. The employee will not be allowed to return to work until a new Department of Professional Regulation identification card is issued.

Surrender of State of Illinois Agent Identification Card and/or Company Identification:

a. Any employee whose employment is terminated or suspended will surrender their Illinois Department of Financial and Professional Regulation Agent Identification Card and company identification access card immediately to the SSPG.
b. All employee access will be immediately terminated.
c. The dispensary organization will then return the agent identification card to the division within 5 business days.
d. Refusal or failure to surrender the identification will require the Security Officer to file a report with the Illinois State Police and Department of Financial, Professional Regulation and local law enforcement.

Visitor Management:

a. All visitors and/or service professionals will be required to provide two forms of identification (one being government issued picture identification) before being granted access to the dispensary facility.
    i. Acceptable forms of picture identification:
        1. Valid, State issued Driver's License.
        2. Valid, State issued Identification Card.
        3. Valid Passport.

[redacted]

b. All visitors will be documented in the visitor log.
    i. Visitor log will be maintained in the SSPG security office.
    ii. Visitor logs are retained for five years.
c. The visitor log will contain the following information:
    i. Full name of the individual requesting entry to the dispensary.
    ii. Nature of business.
    iii. Identification provided.
    iv. Visitor badge number.
    v. Time of arrival and departure.
    vi. Name of escort.
d. All visitors will be issued a sequentially numbered visitor ID card that must be prominently displayed in an unobstructed location, on their torso, at all times, while they are in and around the dispensary facility.
e. Visitors ID's will be at least 3" x 3" and clearly state visitor with a number assigned to the badge.
f. All visitors will be escorted by Silver Star Protection Group security professional or dispensary agent at all times.
g. Visitors that perform maintenance at the dispensary facility will have their bags and tools searched for contraband and weapons prior to being granted access to the facility.
h. Visitors will be required to surrender their visitor ID badge upon departure.
i. Americanna Dream will submit a list to the Department of the names of all service professionals that will work at the dispensary. The list shall include a description of the type of business or service provided. Changes to the service professional list shall be promptly provided. No service professional shall work in the dispensary until the name is provided to the Department on the service professional list.

Public Access Areas:

a. Public Access Areas (PAA) are the only areas in the dispensary accessible to the public (non-purchasers) including the parking area, lobby/waiting room and public restroom in waiting area.
b. All other areas in the dispensary are prohibited to members of the public (non-purchasers). Access to the PAA will be limited to individuals with a legitimate purpose to enter the dispensary such as accompanying a purchaser or vendor meetings.

Limited Access Areas:

a. No person, except the following, are permitted entry into the dispensary's limited access area:
    i. Qualified purchasers, authorized visitors and approved service personnel.
    ii. OAPP participants.
    iii. Dispensing organization agents, the Division or the Division's authorized representative, ISP, or other federal, State or local representatives performing duties as required by federal or State law.
    iv. Emergency personnel when necessary to perform official emergency duties.
    v. Transportation center agents with transportation center agent identification cards may access dispensaries to perform duties supporting the delivery of cannabis, including but not limited to educating dispensary agents and correcting mislabeled product.
    vi. AMERICANNA DREAM may allow service professionals to enter when they are working on a job that requires their presence at the dispensary, such as installing or maintaining security devices or providing construction services. Upon a Americanna Dream's prior written request, the Department

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may approve a request to allow a visitor to enter the limited access area of a dispensary. The written request must include the name of the dispensing organization agent requesting the visit, the name of the visitor, the reason for the visit, and the date and time of the proposed visit. Visits must be for a purpose in furtherance of the Act. The Department must issue written approval before the dispensing organization allows a visitor access to the dispensary.

vii. Visitors are prohibited from entering the restricted access area.

viii. Any person, other than a dispensary agent, authorized to be at a dispensary shall be monitored, while in the limited access area, at all times by a dispensing organization agent.

Restricted Access Areas:

a. Access to a dispensary is restricted as defined in the Act and this Part, persons, except the following, are permitted entry into the restricted access areas in the dispensary:
   - Dispensing organization agents, the Department or the Department's authorized representative, ISP, or other federal or State officials performing duties as required by federal or State law.
   - Transportation center agents with transportation center agent identification cards may deliver Cannabis to a dispensary.
   - Emergency personnel when necessary to perform official duties.
   - A dispensing organization may allow service professionals to enter when working on a job that requires their presence at the dispensary, such as installing or maintaining security devices or providing construction services.
   - Any person, other than a dispensary agent, authorized to be at a dispensary pursuant to this subsection (a) and with access to the restricted access area must be accompanied at all times by a dispensing organization agent.

b. All "Restricted Access" areas will have the proper signage to clearly identify all restricted access areas in the dispensary.

c. All restricted access areas will be identified by posting a sign that is a minimum of 12" x 12". The sign will state: "Do Not Enter- Restricted Access Area – Access Restricted to Authorized Personal Only."

d. All lettering will be 1 inch in height or greater. Signage will be written in English and translated into additional languages as needed.

e. The placard will be clearly visible and readable by all customers.

f. These signs will clearly notify purchasers and visitors that they are not to enter the restricted areas of the dispensary.

g. All dispensary agents (employees) and visitors are required to display their identification in an unobstructed area at all times. This will enable dispensary agents and Silver Star Protection Group security to readily identify authorized personnel in restricted access areas.

h. All individuals without properly displayed identification will be challenged and/or removed by SSPG security officers.

i. All restricted access areas will be secured, locked and access granted via the Electronically Engineered Access Control System. (Americanna Dream will have keys back-up plan in the event of power failure, see key management below).

j. Restricted access areas will have security grade doors, frames and locked to prevent unauthorized entry.

k. Employees with a "need to be in a restricted access area" will only be granted access to the restricted access area in the Electronic Access Control System.

l. The Electronically Engineered Access Control System and video monitoring system will provide a complete history of all movement in the restricted access area.

m. Cannabis will only be dispensed, received, stored, packaged, and processed for sale in the (RAA) of the dispensary.
n. RAA's include:
    - Secure storage room.
    - Vault room.
    - Packaging and sale preparation area.
    - Sally port/receiving vestibule.
    - IT and security rooms.
    - Area behind the sales counter.

Key Management Program:

a. Only limited personnel have access to the facility keys.
b. Keys will not be assigned to dispensary employees.
c. One full set of keys will be contained in the security vault. Additional sets may be assigned to SSPG security staff as needed.
d. Each key must contain a unique identification number that is recorded in a key control log. This number assigned to the key will not be the door or key number of the corresponding lock.
e. The keys and locks will only be utilized as a back-up to the engineered electronically controlled access system in the event of power-loss or access control system failure.
f. Any time the spare access keys are utilized it will be recorded in the key control log maintained in the security office.
g. If the access keys are utilized, they will be removed and secured on the dispensary agent's person. Keys will not be left unattended in locks.
h. Once the dispensary agent is done utilizing the access keys they will be returned, logged back into the key control log and secured in the security vault.
i. When loss or compromise of a key is suspected, all door lock cores will be changed within 24 hours. A "Do Not Duplicate" key marking must be placed on every key.
j. The key control log will be locked in the security office and made available to ISP and the Division upon request.

General Patrol Duties:

Security officers and/or Agent in Charge should adhere to the following while on general patrol duty:

a. Be aware and observant. Use your professional presence to promote security and to discourage unacceptable activity. **Avoid establishing predictable patrol patterns.** Vary what you do on patrol so you can observe the entire area. Immediately notify your supervisor and the client contact whenever you notice or suspect something that may put the client's assets in danger.
b. Make sure the premises are secure.
c. Be on the lookout for anything unusual or different. Look in all directions while patrolling. Some important items to look for include:
    - Unlocked doors, gates or other kinds of enclosures.
    - People in unexpected places or restricted areas.
    - Intruders or suspicious people.
    - Employees disregarding company rules.

- Leaks or spills.
- Cracked pipes.
- Suspicious packages.
- Unusual noises.
- Unusual odors.
- Temperature changes.
- Burned out lights.
- Unusual shadows.
- Malfunctioning equipment.

Security Patrols and monitoring:

a. SSPG security personnel will conduct random security sweeps throughout the day.
b. SSPG security personnel will monitor the video surveillance system at random intervals as needed.
c. Sweeps shall ensure all trees, bushes and other foliage outside the dispensary premises do not allow a person to conceal themselves from sight.
d. Ensure lighting is sufficient to facilitate surveillance.
e. Check security equipment to ensure maximum functionality.

Receiving "non-Cannabis shipments":

a. The unloading or loading of materials can only be done via the front or rear door of the dispensary as deemed appropriate by dispensary facility management.
b. Freight is not allowed to be moved through the facility without the supervision of a designated employee to provide a safer and secure environment during business hours.
c. All deliveries will be document in the Daily Activity Log.
d. A freight bill or bill of lading must be presented for the security officer and/or Dispensary Agent as appropriate to receive the delivery at the interior of the facility.
e. At the entrance, the freight bill will be compared to the purchase order to confirm the delivery is correct. The shipment will be unloaded and inspected for damage before it is brought into the building.
f. Trash collection services will be contracted with a local refuse company that will have a regular schedule of pickup days and times. Neither the trash truck driver nor any other employees from the refuse company are allowed into the building.

Incoming and Outgoing Package Inspection:

a. SSPG will endeavor to ensure no company property leaves the facility without proper authorization and that nothing illegal or threatening is brought into the facility.
b. Employees and visitors are required to show security officers the contents of packages brought into or taken from the facility. The following steps should be adhered to when inspecting incoming and outgoing packages:
    i. As employees and visitors enter and exit the facility be aware of suspicious activity.
    ii. Do not allow employees, visitors or purchasers to bring into the facility restricted items such as:
        1. Tape recorders.
        2. VCRs.

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3. Illegal drugs.
4. Alcohol.
5. Weapons.
6. Flammable items.

iii. If a legal but restricted item is identified, inform the individuals of the restricted item and ask them to check the item at the security post.

iv. When accepting the item, have the individual sign a property sign---in sheet, describing the property. Make sure the individual signs the sheet again when he or she picks up the item.

v. If an illegal item is identified:

1. Immediately notify the client contact.
2. Ask the owner to wait until client contact arrives.
3. If he or she leaves, ask those in the area if they know the individual's name and record the names of several eyewitnesses to the incident.
4. Complete a factual incident report that includes the following:
   a. Time event took place.
   b. Individual's name.
   c. Individual's description.
   d. Illegal item or substance.
   e. Name and telephone number of eyewitnesses.
   f. Who was contacted about the incident?

vi. Do not allow employees or visitors to take company property from the facility without proper authorization.

vii. If the individual refuses to cooperate, immediately notify the site supervisor and client contact. Do not attempt to physically restrain the individual unless lives are endangered.

viii. Record the event in the daily report and logbook, and complete an incident report that includes the following information:

1. Individual's name or description.
2. Property description.
3. Date and time the incident took place.

Cannabis Inventory Management:

Americanna Dream agent-in-charge shall have primary oversight of the dispensing organization's cannabis inventory verification system, and its point-of-sale system. The inventory point-of-sale system shall be real-time, web-based, and accessible by the Department at any time. The point-of-sale system shall track at a minimum the date of sale, amount, price, and currency. (b) A dispensing organization shall establish an account with the State's verification system that documents all acquisition, sale, destruction and adjustments

[redacted]

as outlined below.

Receiving deliveries of cannabis:

a. Pursuant to Illinois Department of Agriculture ("DOA") regulations, Americanna Dream will ensure cultivation centers send a shipping manifest (on a form prescribed by DOA) by a secure means of communication (such as encrypted digital transmission) to three entities at least 24 hours prior to transporting Cannabis. The notice must be sent to the dispensary ordering the product, to DOA and to the cultivation center's transportation, logistics and security personnel.
b. Americanna Dream will maintain a secure record of all cultivation center shipping manifests and will make them available to DOA, ISP or other authorized agencies upon request. The manifest will contain precise information about the product to be shipped including product description, weight, size and package type (bottle, bag, box, etc.).
c. Americanna Dream dispensary will only accept cannabis or cannabis-infused products from a licensed adult use cultivation center, craft grower, infuser or transporter.
d. Americanna Dream will inspect and count product received by the adult use cultivation center before dispensing it.
e. Americanna Dream will only accept a cannabis product from a cultivation center unless it is prepackaged and labeled in accordance with this Part, 8 Ill. Adm. Code 1000 2104 and 77 Ill. Adm. Code 946.
f. Americanna Dream will accept all cannabis deliveries directly into a restricted access area of the Dispensary. Americanna Dream will receive and verify deliveries at the rear door of the facility directly into the restricted access area of the dispensary. Once verified they will be delivered directly to daily inventory storage or the vault in the restricted access area and promptly.
g. Deliveries may not be accepted through the public or limited access areas unless otherwise approved by the Department.
h. Americanna Dream will document the delivery of all cannabis into States verification system and Illinois Tracking System.
i. Americanna Dream will also maintain a cannabis delivery log.
j. Upon cannabis delivery, Americanna Dream will confirm the product's name, strain name, weight and identification number on the manifest matches the information on the cannabis product label and package. The product name listed, and the weight listed in the State verification system and Illinois Cannabis Tracking System shall match the product packaging.
k. A Americanna Dream dispensary agent will document all deliveries and include the following information in the state-wide seed to sale and delivery log:
    a. The quantity, strain, variety and batch number of each product received.
    b. The name and registration identification number of the licensed adult use cultivation center, craft grower, or infuser providing the cannabis or cannabis-infused products.
    c. The name and registry identification number of the licensed adult use cultivation center, craft grower, infuser, or transportation agent delivering the cannabis.
    d. The name and registry identification number of the dispensing organization agent receiving cannabis.
    e. The date of acquisition.
l. Americanna Dream will only receive shipments of cannabis from Department of Agriculture licensed "Transport Organizations" who's officers produce transport organization identification cards upon arrival.
m. The dispensary agent will contact the cultivation center's transportation group the day prior to the scheduled delivery date to confirm the date and time of delivery and to obtain the transportation team's contact information.

n. SSPG security personnel will require the transportation team to contact the dispensary when the delivery vehicle is approximately 15 minutes from the dispensary.
o. SSPG will prepare the dispensary location for arrival. SSPG will monitor all facets of the location to ensure a safe arrival point for the cultivation transportation team.
p. The Dispensary Agent will go to the rear door of the dispensary to greet the transportation agents.
q. SSPG personnel will have real time communication (via cell phones) with the cultivation center transportation team approximately one minute prior to its arrival. This will allow SSPG and the transportation team to communicate and coordinate efforts to ensure that the delivery proceeds smoothly and without incident.
r. As the transportation team approaches, SSPG personnel will meet the transportation at the rear door of the facility to ensure the safe and efficient arrival of the transportation team.
s. Upon arrival, SSPG personnel will request the transportation team's agent identification cards. SSPG will inspect the undercarriage of the delivery vehicle to ensure that no unauthorized persons or material are present.
t. The Dispensary Agent-in-Charge or designee will supervise the verification of documents, the transfer of payment and the placement of the delivered products in the appropriate locations within the Restricted Access Area and will document the delivery in the electronic verification system. SSPG will maintain security while these activities take place.
u. The DAIC will make a copy of the signed manifest and provide the original to the transportation agent.
v. Once the delivery transaction is concluded (and all cannabis and currency are properly secured) and the transportation team is ready to leave, the SSPG security professional will ensure that exterior conditions are safe for departure. SSPG security personnel will remain in contact with the transportation team until they have left the premises.

<u>Cannabis storage:</u>

1. All cannabis delivered to and on inventory must be stored on the registered dispensary premises. No exceptions.
2. All inventoried cannabis on registered premises will be secured in a "restricted access area" and tracked consistently within the inventory tracking rules.
3. Containers storing cannabis that have been tampered with, damaged, or opened shall be labeled with the date opened and quarantined from other cannabis products in the vault until they are disposed.
4. Cannabis that was tampered with, expired, or damaged shall not be stored at the premises for more than 7 calendar days.
5. Cannabis samples shall be in a sealed container. Samples will be maintained in the restricted access area.
6. Cannabis will only be stored, packaged, sold and processed for sale in the Restricted Access Areas of the dispensary.
    a. Such Restricted Access Areas include:
        i. Daily stock room.
        ii. Vault room.
        iii. Packaging and sale preparation area.
        iv. Receiving area/sally port

    b. Restricted Access Sale Area:
        i. During hours of operation, Americanna Dream will store and dispense all cannabis from the restricted access area. Cannabis will be stored in an enclosed locked room or cabinet and accessible only to specifically authorized dispensing organization agents.

[redacted]

ii. As a sale is transacted, cannabis will be removed by the dispensary agent from locked storage cabinet or the "restricted access" inventory control area and delivered to the customer at the POS counter.
iii. Customers will not be allowed to loiter and /or consume the cannabis on the premises.
iv. Americanna Dream will only maintain the cannabis inventory sufficient to satisfy the day's business needs in the restricted access sale area.
v. At the end of business all cannabis in the sale area will be properly inventoried in the electronic verification system and stored in the secure vault for overnight storage.

c. Storage of cannabis:
   i. During business hours, all cannabis not needed for that business days' sales will be stored in the vault located in the secured storage area.
   i. During non-business hours all cannabis will be stored in the secure vault in the restricted access area.
   ii. Access will be restricted only to individuals who are approved access to the "Restricted Access Areas" of the facility.

Destruction of Cannabis:

Procedures for documenting the disposal of cannabis:

a. AMERICANNA DREAM will ensure that all destruction of cannabis is completed within all applicable guidelines as spelled out in 410 ILCS 705/15-90.
b. AMERICANNA DREAM will ensure all cannabis and cannabis-infused products are destroyed by rendering them unusable using methods approved by the Department that comply with this Act and rules.
c. AMERICANNA DREAM will promptly dispose of all cannabis waste rendered unusable, according to this Act and rules. Applicant will utilize both of the following Department approved methods:
   a. Compostable mixed waste: compost, anaerobic digester, or other facility with the approval of the jurisdictional health department.
   b. Non-compostable mixed waste: landfill, incinerator, or other facility with the approval of the jurisdictional health department.
d. AMERICANNA DREAM will weigh, record and enter all waste and unusable product into the inventory system before rendering it unusable.
e. All waste and unusable cannabis concentrates and cannabis-infused products will be recorded and entered into the inventory system before rendering it unusable.
f. AMERICANNA DREAM will fully document all disposed of cannabis in the statewide seed-to-sale tracking system, including:
   a. Product Description - A description of the products, including the quantity, strain, variety, batch number, and reason for the cannabis being disposed.
   b. Methods - The method of disposal.
   c. Date and Time - The date and time of disposal.
g. All destruction and disposal will be verified by 2 employees, specifically the AIC (mandatory) and another dispensary agent. Destruction and disposal will be conducted in the packaging and preparation area in full view of video surveillance system.
h. AMERICANNA DREAM will retain all electronic documentation of destruction and disposal for a period of at least 5 years.

[redacted]

Documenting incidents:

Reporting loss or theft of cannabis:

a. Americanna Dream's agent-in-charge shall conduct daily inventory reconciliation documenting and balancing cannabis inventory by confirming the State's verification system matches the dispensing organization's point-of-sale system and the amount of physical product at the dispensary.
    1) Americanna Dream will receive Department approval before completing an inventory adjustment.
    2) Americanna Dream will provide a detailed reason for the adjustment.
    3) Americanna Dream will retain Inventory adjustment documentation at the dispensary for 2 years from the date performed.
    4) If Americanna Dream identifies an imbalance in the amount of cannabis after the daily inventory reconciliation due to mistake, Americanna Dream will determine how the imbalance occurred and immediately upon discovery take and document corrective action.
    5) If Americanna Dream cannot identify the reason for the mistake within 2 calendar days after first discovery, Americanna Dream will inform the Department immediately in writing of the imbalance and the corrective action taken to date.
    6) Americanna Dream will work diligently to determine the reason for the mistake.
    7) If Americanna Dream identifies an imbalance in the amount of cannabis after the daily inventory reconciliation or through other means due to theft, criminal activity, or suspected criminal activity, Americanna Dream will immediately determine how the reduction occurred and take and document corrective action.
    8) Within 24 hours after the first discovery of the reduction due to theft, criminal activity, or suspected criminal activity, Americanna Dream will inform the Department and the Department of State Police in writing.
b. Any principal officer or agent of Americanna Dream will promptly document and report any loss or theft of cannabis from the dispensary to the Department of State Police and the Department. It is the duty of any dispensing organization agent who becomes aware of the loss or theft to report it as provided in this Article.
c. The report to the division shall include:
    1) Name and address of the dispensary.
    2) Amount and type of cannabis lost or stolen.
    3) Circumstances surrounding the theft or loss of cannabis.
    4) Date and time of loss or theft.
    5) The date the loss or theft was discovered.
    6) The person(s) who discovered the loss or theft.
    7) The person(s) responsible for loss or theft.
    8) Any other information the reporter believes might be helpful in establishing the cause of the loss or theft.
d. All employees present, working or associated with the theft or loss will be required to write a report and/or submit to an interview prior to ending their tour of duty.
e. As needed, Americanna Dream will engage local law enforcement for assistance.

Discrepancies in Inventory:

[redacted]

1. All discrepancies in inventory will be thoroughly investigated and resolved quickly.
2. If an audit discrepancy (increase or decrease in inventory) is due to documented causes (human error, typos etc.), the dispensing organization shall document the cause in the incident log and electronic inventory control system.
3. The Dispensing Organization (DO) will enact new protocols and/or training to ensure the discrepancy does not re-occur.
4. If the discrepancy in inventory (increase or decrease) is not due to documented causes the dispensing organization will determine where the loss occurred.
    a. Dispensing organization agent and SSPG will review security cameras, visitor logs, transaction logs, determine who had access to restricted access area and point of sale areas where Cannabis was located. Check electronic access logs (strike plates and scramble pads) to determine who accessed cannabis storage and sale areas and conduct employee interviews to determine where the loss occurred.
    b. Once the cause is identified the dispensing organization will take corrective action by establishing new protocols and/or training to ensure no re-occurrence.
    c. Dispensing organization will then document the cause and corrective action take into the incident log and the electronic inventory system.
    d. Suspected criminal activity:
        i. If the loss is due to suspected criminal activity Americanna Dream will make a report of the circumstances and fats know surrounding the incident to the Department, ISP and local law enforcement.
        ii. Americanna Dream will actively assist the Department, ISP and local law enforcement with any investigation or queries.
        iii. Americanna Dream will ensure all evidence (video, prints, witness statements etc.) are preserved and properly tendered to the Department, ISP and local law enforcement.
        iv. Americanna Dream will ensure all employees are made available for Department, ISP and Local Law enforcement.
        v. All of the above will be documented in the incident log.
        vi. Americanna Dream will maintain all of the above inventory records in a secure locked location for five years from the date of the document was created. The DO will provide any inventory document to the Division for review upon request.

<u>All other incidents:</u>

a. Are reported to the DAIC and SSPG supervisor immediately.
b. Promptly document on the SSPG incident form and submitted to SSPG direct supervisor within 24 hours of the incident.

<u>Liaison with local law enforcement:</u>

a. SSPG will maintain an open and effective relationship with local law enforcement.
b. SSPG will assist any state, local or federal law enforcement agency with all lawful requests.
    a. SSPG security professionals will vet all law enforcement requests through the DAIC and SSPG manager prior to compliance.

<u>Use of force:</u>

a. SSPG Security Professionals are authorized to utilize deadly force to protect life. Protection of life includes customers Americanna Dream personnel, and SSPG personal and innocent bystanders.
b. SSPG shall seek law enforcements assistance as early as safely possible during incidents.
c. All use of force incidents will be comprehensively documented within SSPG corporate policies.

USE OF FORCE NOTIFICATIONS - FIREARMS

a. Employees who discharge their firearms, except during legitimate practice or SSPG-endorsed training, will notify their supervisors immediately. Written reports of all such incidents will be completed by the employees involved or other assigned security personnel or investigators as directed by the supervisors.
b. Investigation of shootings involving security personnel will commence immediately after the incident occurs. Security personnel at the scene of the shooting shall request a supervisorto respond to the location and management will be notified.
c. Investigations of use-of-force incidents involving firearms may be conducted by SSPG personnel and the law enforcement agency with the legal requirement to respond and investigate.

USE OF FORCE NOTIFICATIONS - OTHER THAN FIREARMS

a. Employees of the Company, while in the performance of their duties, who are involved in an incident where death or serious bodily injury is inflicted on another person as a result of some type of enforcement activity will immediately notify their immediate supervisors.
b. Investigations of use-of-force incidents not involving firearms may be conducted bySSPG personnel and the law enforcement agency with the legal responsibility to respond and investigate.

Electronic Access Control System (EACS).

1. All dispensary agents and Americanna Dream personnel will be enrolled into the EEACS.
    a. Only the DAIC and/or the SSPG Security Officer will be able to enroll individuals into the EACS.
2. Enrollment will consist of providing biographical data into the system and creating an employee profile. Information will include:
    a. Name.
    b. Date of birth.
    c. Height.
    d. Weight.
    e. Photograph.
    f. Job title.
    g. Dispensary agent identification card and expiration date.
3. Each employee will be given a designated access level based on their scope of employment(duties) in the dispensary organization.
4. Access levels (door groups) will be given to those employees with a need to access specific areas. Limiting access to these areas will be vital to preventing theft, loss and diversion.
5. Each employee will be given an access card that has been programed with a specific door group.
6. Each employee will require a two-level authentication to receive access to room or area in the dispensary facility.
7. Two level authentications consist of: 1) something you have (security access card) and 2) something you know (password).
8. Each door, portal or access point will be equipped with an access scramble pad and strike plate.
9. To gain access to an area, an individual will need to swipe their security card across the scramble pad. The employee inputs their 4-6 security code into the pad and is granted access to the area. Each 4-6-digit security code is programed assigned to each individual security card.
10. The EEACS will create an electronic record of all access (movement) and alarm events in the dispensary facility. The electronic record will be stored on the windows-based server in the security office. The EEACS will have report generating capabilities for all events and alarms that occur in and

around the dispensary.

11. Upon request, the dispensing organization will be able to immediately provide ISP, the Department, the Division and local law enforcement a complete record of all access and alarm history in the facility.
12. All EEACS records will be retained for 5 years.
13. Americanna Dream's EEACS system will not solely be controlled by an electronic access panel, this will ensure that locks are not released during a power outage.
14. The EEACS will have a battery back-up providing 4 hours of service in the event of a power loss.
15. Cards off after closing.

Video Surveillance System:

a. Americanna Dream will install a commercial grade, UL rated, listed and approved video surveillance system. All installation and service of the equipment will be done by an Illinois licensed private alarm contractor or private alarm contractor agency.
b. The security surveillance system internal cameras will have unobstructed video surveillance of all enclosed dispensary areas, unless prohibited by law. Internal cameras will cover all interior entrance and exit points, access points, windows, sale areas, safes, vaults, secure storage, employee areas, sally port and any areas where cannabis is stored, handled, dispensed or destroyed.
c. Americanna Dream's video monitoring system captures each point-of-sale location and is able to identify the dispensing agent distributing cannabis and any qualifying patient or designated care giver purchasing Cannabis. It also captures the sale, the individuals and the computer monitors used for the sale.
d. The external camera system has an unobstructed video surveillance of the entire perimeter of the dispensary center. Americanna Dream Dispensing Organization will ensure all trees, shrubs, bushes and foliage are trimmed and well maintained to ensure external cameras remain unobstructed. The external cameras cover the entire exterior of the building, all external doors, windows and access points, visitor and employee parking, roof of building, outlying grounds leading up to the perimeter fence, and main gate, storefront and parking lots.
e. The video surveillance security system is supported by a facility lighting plan to ensure all dispensary areas covered by the video surveillance monitoring system are fully illuminated at all times of the day. This ensures the video monitoring system captures the highest quality images.
f. External cameras are angled to allow for the capture of facial recognition, clear and certain identification of any person entering and exiting the dispensary, the immediate surrounding area and license plates of vehicles in the parking lot(s).
g. Internal cameras will cover all interior entrance and exit points, sale areas, safes, vaults, secure storage, employee areas, sally port and any areas where cannabis is stored, handled, dispensed or destroyed.
h. To prevent theft loss or diversion, the video camera system will have a camera or cameras recording each point-of-sale location allowing for identification of the dispensary agent distributing the cannabis and the qualifying patient or designated caregiver purchasing the Cannabis. The camera(s) will visually capture and record the individuals involved in the transaction and the computer monitors used for the sale. All cameras will be angled to allow for facial recognition and the capture of clear and certain identification of any person entering or exiting the dispensary area and in lighting sufficient during all times of night and day.
i. To eliminate unauthorized access to the dispensary facility, all "off-site" or remote video monitoring will be done through a virtual private network (VPN). The VPN will be provisioned to only allow authorized individuals (ISP, the Division etc.) to remotely access the security surveillance camera system. The VPN will allow real-time remote viewing of all video footage

captured on the security surveillance system.

j. Americanna Dream Dispensary will have a dedicated security room in which all "on-site" live security video monitoring and recording will be conducted.
k. All security surveillance monitors will be 19 inches or larger.
l. The monitoring room contains a video printer capable of producing a clear, still photo from any video camera.
m. Access to the security room that contains the surveillance monitoring and/or video recording equipment is a restricted access area and is only limited to persons that are essential to the surveillance operations, law enforcement officers acting within their jurisdiction, security system service personnel and the Division. All others will be denied access.
n. A current list of authorized dispensary agents and service personnel that have access to the surveillance room will be made available to the Division, the Department of Agriculture or ISP upon request.
o. All security equipment and recordings will be maintained in good working order and will be kept in a secure location to prevent loss, theft, destruction or alterations.
p. Silver Star Protection Group will conduct weekly inspections and function tests on the entire security surveillance system and lighting system to ensure the entire system is functioning properly. The tests will be recorded in the security inspection and maintenance log. For safekeeping, the security maintenance and inspection log will be locked in a secure cabinet in the security monitoring office. The security maintenance and inspection log will be provided to ISP or the Division upon request.
q. Americanna Dream's dispensary video surveillance system has a failure notification system that has both a visual and audible notification. In addition, it will notify the DAIC and SSPG by text and email immediately.
r. The video monitoring system will have a battery back-up providing 4 hours of service in the event of a power loss.

Video Recordings:

a. All video surveillance captured on the video monitoring system will be stored for 90 days or more on site.
b. All video surveillance data captured will be in 6-megapixel resolution at 30 frames per second.
c. The video surveillance software and analytics will allow Americanna Dream and SSPG to examine and reproduce the surveillance data in many ways. The DVR software will allow Americanna Dream and SSPG to rewind, replay, slow motion, fast forward, freeze and zoom all surveillance footage. The software will make all video recordings available for immediate viewing upon request.
d. Through the DVR software and a color printer, Americanna Dream and SSPG will have the ability to immediately produce a clear, color photo from either live or recorded video.
e. The DVR software will be able to export still images in an industry standard format (including .jpg, .bmp, .gif). In addition, exported video will be able to be archived in a proprietary format that ensures authentication of the video and guarantees no alteration of the video has taken place. All exported video will be able to be saved in an industry standard file format that can be played on a standard computer operating system.
f. All video surveillance recordings will be date and time stamped. Date and time will be synchronized and set correctly and positioned so that it will not significantly obstruct the picture.
g. As soon as the dispensing organization becomes aware of loss or theft of cannabis, pending civil, criminal or administrative investigation or legal proceeding they will securely store and retain all relevant video for as long as necessary or until the conclusion of above listed investigation or proceeding.

h. All recordings will be erased or destroyed prior to disposal.
i. Live video monitoring.
j. Americanna Dream dispensing organization will be able to deliver real time video surveillance data to ISP, the Division, local law enforcement and SSPG.
k. Americanna Dream will grant access to all "live video surveillance footage at the dispensing center" by virtual private network (VPN) to ensure the "live Feeds" are not hacked or compromised during transmission. ISP, the Division, local law enforcement and SSPG will all be provisioned as remote viewers of the surveillance data.
l. The VPN will be configured to "site to site mode" allowing for continuous monitoring of video between the dispensary and ISP and the division.
m. The VPN will be configured to "always on" mode to ensure uninterrupted viewing of surveillance footage. Once provisioned as remote viewer's ISP, the Division, local law enforcement and SSPG will be able to view the live surveillance footage over a secure internet web browser. These live feeds will provide an additional level of security, as it will enable the Department, the Division; ISP and local law enforcement deliver the most effective response to emergency situations.
n. The Dispensing Organization will have redundant access network (WAN) connections (multiple internet circuits) to ensure the continuation of service. In the event the primary internet circuit fails, there are secondary internet circuits that will providing live video surveillance monitoring. This will ensure the uninterrupted access to "live video surveillance monitoring" for ISP, Division, local law enforcement and SSPG.

Alarm System:

a. Americanna Dream will install a commercial grade, UL rated, listed and approved alarm system. All installation and service of the equipment will be done by an Illinois licensed private alarm contractor or private alarm contractor agency.
b. Duress alarms are located: In the Front room by security, By the POS counter and in the back restricted access area. Designated employees will wear mobile duress alarms on lanyards.
    a. Duress alarms report to the alarm company who then contacts local police (public safety answering point for the law enforcement agency having primary jurisdiction).
b. After hours intrusion detection alarms
    a. High biased contacts on all exterior doors and windows that alert when open or breached.
    b. Glass break sensors on all exterior windows of the dispensary.
    c. All exterior windows of the dispensary will be covered with shatterproof tinted film.
c. Motion detection alarms in designated areas.
d. Alarms failure notification systems alerts by DAIC and SSPG text and email immediately.
e. Americanna Dream will have at least one security professional on premises 24 hours a day to monitor and respond to all alarms immediately.
f. The alarm system will have a redundant reporting/notification system: 1) AA listed high security radio connection 2) Internet connection (back up).

Lighting system:

a. The entire exterior of the dispensary and roof will be equipped with sufficient lighting to ensure full visibility of entire premise at all times.
b. Areas included are:
    a. Employee and customer parking.
    b. All building entrances and points of access.
    c. All exterior walls.
    d. All windows.
    e. Roof.

f. Perimeter curtilage.
g. Other areas of interest.

c. Lighting will be adjusted monthly for seasonal variations in daylight. It will also be adjusted for daylight savings time.

Monthly testing of security equipment:

a. SSPG will test all components of the security equipment on a weekly basis to ensure it is in proper working order.
b. Ensure lighting is adjusted for seasonal variations in daylight.
c. Document all tests in the security equipment test log.

Requests from the State, Department or Law Enforcement:

a. All lawful requests from any State, Local or Federal Law Enforcement agency will be complied with fully.
b. All requests will be vetted through the DAIC and SSPG management.
c. If an incident arises during the non-business hours, the Silver Star security professional will contact:
    a. Local Law Enforcement (Crystal Lake Police Department).
    b. Dispensary Agent In Charge.
    c. Silver Star Protection Group Director of Operations.

Close of Business Incident Response:

a. In the event of an unforeseen incident that requires emergency response (non-law enforcement related) Silver Star Protection Group will contact:
    i. Dispensary Agent In Charge.
    ii. Silver Star Protection Group.

Maintaining Site Logs (See Appendices for site logs):

a) Americanna Dream will maintain the following logs on site:
    a. Daily logbook.
    b. Incident log.
    c. Visitor log.
    d. Key log.
    e. Training log.
    f. Monthly security system inspection log.
    g. Maintenance log.
    h. Current "Third Party Vendors" list.
b) Site logs will be maintained in both paper and electronic format.
c) Site logs will be kept electronically on a secured shared drive. In addition, a paper log will be maintained in a logbook.
d) Both electronic and paper logs will be maintained and secured in the SSPG Security Office.
e) All site logs will be maintained for a minimum of 5 years. Site logs will be turned over to The Division, Department or ISP upon request.

Emergency Contacts:

Contact	Provider	Phone Number

Police, Fire or Paramedic	City of Crystal Lake	911
Police Non-Emergency	Crystal Lake Police Department	847-398-5511
Poison Control	American Association of Poison Control	800-222-1222
Gas (leak, odor, emergency)	NICOR Illinois	888-642-6748
Electric	Commonwealth Edison (ComEd)	877-426-6331
Dispensary-Agent-In-Charge	TBD	
Security Company	Silver Star Protection Group – Patrick Walter Bob Olita Ed Farrell	 773-416-3877 847-624-1799 630-577-7537

Emergency Procedures

Workplace Violence:

a. It is company policy to promote a safe environment for its employees. The company is committed to working with its employees to maintain a work environment free from violence, harassment, intimidation, and other disruptive behavior.
b. Such behavior can include oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm.
c. Most workplaces are immune to such events; however, such behavior will not be tolerated in the workplace.
d. All reports or incidents will be taken seriously and will be dealt with appropriately.
e. Individuals who commit such acts may be removed from the premises and be subject to disciplinary action, criminal penalties, or both.
f. All incidents will be thoroughly document in accordance with this security policy section 18 (c).

Emergency Management

Americanna Dream's emergency management plan will consist of four elements:

1) Prevention / Mitigation
2) Preparedness
3) Response
4) Recovery

Prevention/Mitigation:

The first phase in emergency management is Prevention-Mitigation. Prevention is the action taken to decrease the likelihood that an event or crisis will occur. Mitigation is the action taken to eliminate or reduce the loss of life and property damage related to an event or crisis, particularly those that cannot be prevented. The incidents Americanna Dream is seeking to prevent, diminish, or mitigate are defined specifically through a process of hazards identification and risk assessment. Americanna Dream will conduct a quarterly self-assessment to identify potential vulnerabilities. In addition, they will ensure they continually evaluate their protocols to ensure they are utilizing the industries "best practices" in crisis situations.

[redacted]

Preparedness:

Americanna Dream will ensure that are at an elevated state of preparedness at all times. Americanna Dream has developed plans and procedures designed to save lives and to minimize damage when an emergency occurs. Planning, training, and exercising are the essential elements of preparedness. These activities ensure that when a disaster strikes, emergency personnel will be able to provide the best response possible.

Planning:

Americanna Dream has:

- Establishing an incident command system (ICS) consistent with the National Incident Management System (NIMS) for organizing personnel and services to respond in the event of an emergency.
  - Americanna Dream has identified key personnel who must receive training on the National Incident Management System and the Incident Command System.
- Developed all-hazard policies, procedures, and protocols with input from key community partners such as law enforcement, medical services, public health, fire services, and mental health.
- Collaborating with community partners to establish mutual aid agreements that will establish formal interdisciplinary, intergovernmental, and interagency relationships among all the community partners.
- Assigned personnel to manage each ICS function and defining lines of succession in emergency plan as to who is in charge when key leaders are not available.

[redacted]

Americanna Dream has created an Occupant Emergency Plan (OEP)

The occupant emergency plan will provide direction to employees during an emergency situation (natural or man-made). The Occupant Emergency Plan will provide specific instruction for employees on:

a. Building fire response.

b. How to respond to medical emergencies.

c. Natural disaster.

d. Flooding.

e. Bomb threat.

f. Active shooter / hostage situations.

g. Severe weather / natural disaster.

h. Chemical spill.

i. Loss of all power.

Each employee will be given a copy of the Occupant Emergency Plan. A copy of the OEP will be maintained in the security office, secure storage and/ or Dispensary Facility owner and Dispensary Agent in Charge's office.

Training:

Americanna Dream's employees and security staff will be provided training in:

- Most efficient methods for requesting help in emergency situations (emergency notification system).
- Evacuation and reverse evacuation procedures / evacuation routes.
- Secure lockdown.
- Shelter in place.
- Medical emergency response.
- First Aid and AED/CPR.
- Fire suppression / fire extinguisher use.

Exercising:

Americanna Dream will conduct semi-annual emergency management exercises for all employees and security staff at the Dispensary. All exercises will ensure all employees are able to successfully employ all components of the emergency management plan. All training and exercises will be documented and maintained in the security office.

[redacted]

Response:

Americanna Dream maintains a variety of emergency response programs and capabilities, all designed to support the dispensary and surrounding community during times of crisis. Americanna Dream's Emergency Operations Plan provides the framework by which Americanna Dream and its employees will respond to and manage emergency incidents affecting the Dispensary location.

The primary objectives of Emergency Operations Plan are to:

- Protect and preserve of human life.
- Protect the assets of the Dispensing Organization.
- Protect the Dispensary's property and structures.
- Protect the welfare of surrounding community members.
- Facilitate continuity of all dispensary operations.

Recovery:

Continuity of Operations is an effort within the dispensing organization to ensure that essential functions continue to be performed during and after a wide range of emergencies, including localized acts of nature, accidents and related emergencies. In order to achieve that goal, Americanna Dream has identified their Essential Functions and develop plans that allow those functions to be continued throughout, or resumed rapidly after, a disruption of normal activities.

Recovery is an ongoing process. The type and breadth of recovery activities will vary based on the nature and scope of the emergency. However, the goal of the recovery phase is to restore the facility to normal operations. Planning for Recovery begins in the Preparedness phase, and requires support from community leaders to ensure that decisions contribute to implementation and resolution of all four components of recovery.

Recovery includes:

- Physical and Structural Recovery.
- Business Recovery.
- Restoration of operations.
- Psychological and Emotional Recovery.

[redacted]

APPENDICIES:

Appendix A: MEDICAL EMERGENCY

MEDICAL EMERGENCY

• Call medical emergency phone number (check applicable):

† Paramedics

† Ambulance

† Fire Department

† Other

Provide the following information:

a. Nature of medical emergency.

b. Location of the emergency (address, building, room number).

c. Your name and phone number from which you are calling.

• Do not move victim unless absolutely necessary.

• Call the following personnel trained in CPR and First Aid to provide the required assistance prior to the arrival of the professional medical help:

Name: _____

Phone: _____

Name: _____

Phone: _____

• If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance:

1. Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).

2. Clear the air passages using the Heimlich maneuver in case of choking.

• In case of rendering assistance to personnel exposed to hazardous materials, consult the Material Safety Data Sheet (MSDS) and wear the appropriate personal protective equipment. Attempt first aid ONLY if trained and qualified.

APPENDIX B: FIRE EMERGENCY

FIRE EMERGENCY

When fire is discovered:

- Activate the nearest fire alarm (if installed).
- Notify the local Fire Department by calling 911.
- If the fire alarm is not available, notify the site personnel about the fire emergency bythe following means (check applicable):
  - † Voice Communication
  - † Phone Paging
  - † Radio
  - † Other (specify)

Fight the fire ONLY if:

- The Fire Department has been notified.
- The fire is small and is not spreading to other areas.
- Escaping the area is possible by backing up to the nearest exit.
- The fire extinguisher is in working condition and personnel are trained to use it.

Upon being notified about the fire emergency, occupants must:

- Leave the building using the designated escape routes.
- Assemble in the designated area (specify location):
- Remain outside until the competent authority (Designated Official or Designee) announces that it is safe to reenter.

Designated Official, Emergency Coordinator or supervisors must:

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
- Coordinate an orderly evacuation of personnel.
- Perform an accurate head count of personnel reported to the designated area.
- Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the facility.
- Perform assessment and coordinate weather forecast office emergency closing procedures

Area/Floor Monitors must:

- Ensure that all employees have evacuated the area/floor.
- Report any problems to the Emergency Coordinator at the assembly area.

Assistants to Physically Challenged should:

- Assist all physically challenged employees in emergency evacuation.

APPENDIX C: EXTENDED POWER LOSS

Extended Power Loss

In the event of extended power loss to a facility certain precautionary measures should be taken depending on the geographical location and environment of the facility:

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge causing damage to electronics and effecting sensitive equipment.
- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long-term power loss.
    - Fire sprinkler system.
    - Standpipes.
    - Potable water lines.
    - Toilets.
- Add propylene-glycol to drains to prevent traps from freezing.
- Equipment that contain fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.

Upon Restoration of heat and power:

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry.
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on.

APPENDIX D: CHEMICAL SPILL

Chemical Spill

The following are the locations of:

Spill Containment and Security Equipment: _____

Personal Protective Equipment (PPE): MSDS:

_____

When a Large Chemical Spill has occurred:

- Immediately notify the designated official and Emergency Coordinator.
- Contain the spill with available equipment (e.g., pads, booms, absorbent powder, etc.).
- Secure the area and alert other site personnel.
- Do not attempt to clean the spill unless trained to do so.
- Attend to injured personnel and call the medical emergency number, if required.
- Call a local spill cleanup company or the Fire Department (if arrangement has been made) to perform a large chemical (e.g., mercury) spill cleanup.

Name of Spill Cleanup Company: _____

Phone Number: _____

- Evacuate building as necessary.

When a Small Chemical Spill has occurred:

- Notify the Emergency Coordinator and/or supervisor.
- If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
- Deal with the spill in accordance with the instructions described in the MSDS.
- Small spills must be handled in a safe manner, while wearing the proper PPE.
- Review the general spill cleanup procedures.

APPENDIX F: BOMB THREAT

Bomb Threat

TELEPHONE BOMB THREAT CHECKLIST INSTRUCTIONS:

BE CALM, BE COURTEOUS. LISTEN. DO NOT INTERRUPT THE CALLER.

YOUR NAME:_____TIME:_____DATE: _____
CALLER'S IDENTITY SEX: Male_____Female_____Adult_____Juvenile_____APPROXIMATE AGE: _____
ORIGIN OF CALL: Local_____Long Distance_____Telephone Booth _____

VOICE CHARACTERISTICS SPEECH LANGUAGE:

___ Loud____High Pitch_____Raspy_____Intoxicated_____Soft____Deep_____Pleasant_____Other
SPEECH:

___ Fast____Distinct_____Stutter_____Slurred_____Slow____Distorted_____Nasal_____Other ____

LANGUAGE:

Excellent____Fair_____Foul____Good____Poor_____Other

ACCENT____Local_____Foreign_Race_____Not Local_____Region ____

Manner:

Calm____Rational_____Coherent_____Deliberate_____Righteous_____Angry_____Irrational_____Incoherent

___ Emotional____Laughing ____

BACKGROUND Noises:

Factory____Machines_____Music_____Office_____Machines_____Street_____Traffic_____Trains_____Animals
___ Quiet____Voices_____Airplanes_____Party_____Atmosphere

BOMB FACTS PRETEND DIFFICULTY HEARING - KEEP CALLER TALKING - IF CALLER SEEMS AGREEABLE TO FURTHER CONVERSATION, ASK QUESTIONS LIKE:

When will it go off? Certain Hour_____Time Remaining_____
Where is it located? Building Area_____
What kind of bomb? _____
What kind of package? _____
How do you know so much about the bomb? _____
What is your name and address? _____
If building is occupied, inform caller that detonation could cause injury or death.
Upon Termination of call:

Activate malicious call trace: Hang up phone and do not answer another line.

Choose same line and dial *57 (if your phone system has this capability).



[redacted]

Listen for the confirmation announcement and hang up.

Call Security at_____and relay information about call.

Did the caller appear familiar with plant or building (by his/her description of the bomb location)? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist.

Notify your supervisor immediately.

APPENDIX G: SUSPICIOUS PACKAGE/MAIL

Suspicious Package/Mail

If you receive a suspicious package, letter, or object under any circumstances. Do not touch it, tamper with it, or move it.

- Report it to your supervisor.
- Call 911 from a land or hard line (DO NOT USE YOUR CELL PHONE) and request assistance from the "Bomb squad or Unit."
- Evacuate the building to predetermined safe location.
- Do not use cellular phone or radios for communication.
- Provide as much information and detail to first responders.
- Once in the safe area, conduct a headcount and ensure all employees and customers are accounted for.

Suspicious Package Characteristics

Origin — Postmark does not match the city of the return address, name of the sender is unusual or unknown, or no return address given.

Balance — the letter is lopsided or unusually thick, the letter or package seems heavy for its size.

Contents — Stiffness or springiness of contents; protruding wires or components; oily outer wrappings or envelope; feels like it contains a powdery substance.

Smell — Particularly almond or other suspicious odors.

Writing — Handwriting indicates a foreign style not normally received, cut-and-paste letters or rub on block letters are used. Common words, titles or names are misspelled.

APPENDIX H: ACTIVE SHOOTER

Active Shooter

HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY:

Quickly determine the most reasonable way to protect your own life. Remember that customers and clients are likely to follow the lead of employees and managers during an active shooter situation.

1. Evacuate.

If there is an accessible escape path, attempt to evacuate the premises. Be sure to:

- Have an escape route and plan in mind.
- Evacuate regardless of whether others agree to follow.
- Leave your belongings behind.
- Help others escape, if possible.
- Prevent individuals from entering an area where the active shooter may be.
- Keep your hands visible.
- Follow the instructions of any police officers.
- Do not attempt to move wounded people.
- Call 911 when you are safe.

2. Hide out

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you.

Your hiding place should:

- Be out of the active shooter's view.
- Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door).
- Not trap you or restrict your options for movement.

To prevent an active shooter from entering your hiding place:

- Lock the door.
- Blockade the door with heavy furniture.

- HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

If the active shooter is nearby:

[redacted]

- Lock the door.
- Silence your cell phone and/or pager.
- Turn off any source of noise (i.e., radios, televisions).
- Hide behind large items (i.e., cabinets, desks).
- Remain quiet.

If evacuation and hiding out are not possible:

- Remain calm.
- Dial 911, if possible, to alert police to the active shooter's location.
- If you cannot speak, leave the line open and allow the dispatcher to listen.

3. Take action against the active shooter

As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her.
- Throwing items and improvising weapons.
- Yelling.
- Committing to your actions.

HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES

Law enforcement's purpose is to stop the active shooter as soon as possible. Officers will proceed directly to the area in which the last shots were heard.

- Officers can arrive individually or as a team.
- Officers may wear regular patrol uniforms or external bulletproof vests, Kevlar helmets, and other tactical equipment.
- Officers may be armed with rifles, shotguns, handguns.
- Officers may use pepper spray or tear gas to control the situation.
- Officers may shout commands and may push individuals to the ground for their safety.

How to react when law enforcement arrives:

- Remain calm and follow officers' instructions.
- Put down any items in your hands (i.e., bags, jackets).

- Immediately raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid making quick movements toward officers such as holding on to them for safety.
- Avoid pointing, screaming and/or yelling.
- Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises.

Information to provide to law enforcement or 911 operator:

- Location of the active shooter.
- Number of shooters, if more than one.
- Physical description of shooter(s).
- Number and type of weapons held by the shooter(s).
- Number of potential victims at the location.

The first officers to arrive to the scene will not stop to help injured persons. Expect rescue teams comprised of additional officers and emergency medical personnel to follow the initial officers. These rescue teams will treat and remove any injured persons. They may also call upon able-bodied individuals to assist in removing the wounded from the premises.

Once you have reached a safe location or an assembly point, you will likely be held in that area by law enforcement until the situation is under control, and all witnesses have been identified and questioned. Do not leave until law enforcement authorities have instructed you to do so.

APPENDIX I: SEVERE WEATHER AND NATURAL DISASTERS

SEVERE WEATHER AND NATURAL DISASTERS

Tornado:

- When a warning is issued by sirens or other means, seek inside shelter.

Consider the following:

-Small interior rooms on the lowest floor and without windows.

-Hallways on the lowest floor away from doors and windows.

-Rooms constructed with reinforced concrete, brick, or block with no windows.

- Stay away from outside walls and windows.
- Use arms to protect head and neck.
- Remain sheltered until the tornado threat is announced to be over.

Earthquake:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- Assist people with disabilities in finding a safe place.
- Evacuate as instructed by the Emergency Coordinator and/or the designated official.

Flood:

If indoors:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Follow the recommended primary or secondary evacuation routes.

If outdoors:

- Climb to high ground and stay there.
- Avoid walking or driving through flood water.
- If car stalls, abandon it immediately and climb to a higher ground.

Hurricane:

- The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch issued when a hurricane becomes a threat to a coastal area. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.

Once a hurricane watch has been issued:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.

- Moor any boats securely or move to a safe place if time allows.
- Continue to monitor local TV and radio stations for instructions.
- Move early out of low-lying areas or from the coast, at the request of officials.
- If you are on high ground, away from the coast and plan to stay, secure the building, moving all loose items indoors and boarding up windows and openings.
- Collect drinking water in appropriate containers.

Once a hurricane warning has been issued:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Leave areas that might be affected by storm tide or stream flooding.

During a hurricane:

- Remain indoors and consider the following:
  - –Small interior rooms on the lowest floor and without windows.
  - –Hallways on the lowest floor away from doors and windows.
  - –Rooms constructed with reinforced concrete, brick, or block with no windows.

Blizzard:

If indoors:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Stay indoors!
- If there is no heat:
  - –Close off unneeded rooms or areas.
  - –Stuff towels or rags in cracks under doors.
  - –Cover windows at night.
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, lightweight, warm clothing, if available.

If outdoors:

- Find a dry shelter. Cover all exposed parts of the body.
- If shelter is not available:
  - –Prepare a lean-to, wind break, or snow cave for protection from the wind.

[redacted]

–Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.

–Do not eat snow. It will lower your body temperature. Melt it first.

If stranded in a car or truck:

- Stay in the vehicle!
- Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
- Make yourself visible to rescuers.

  –Turn on the dome light at night when running the engine.

  –Tie a colored cloth to your antenna or door.

  –Raise the hood after the snow stops falling.
- Exercise to keep blood circulating and to keep warm.

APPENDIX J: VISITOR ACCESS LOG

VISITOR ACCESS LOG					
Location:			Date:		
Time of Arrival	Nature of Business	Name / Company	Visitor ID #	Time of Departure	Escort

APPENDEX K: CONTRACTOR AND VENDOR SIGN-IN LOG

CONTRACTOR AND VENDOR SIGN-IN LOG						
Location:			Date:			
Time In	Name	Identification/ Visitor ID #	Company	Signature	Time Out	Escort

APPENDEX L: MAIL COURIER LOG

Mail Courier Log						
Location:			Date:			
Rec. Individuals Initials	Time In	Description	Delivered By	Air bill Number	Item Delivered To	Signature of Recipient

APPENDEX M: EMPLOYEE TRAINING RECORD

Employee Training Record			
Location:			
Name of Employee	Course	Trainor	Date of Course

APPENEX N: INCIDENT LOG

Incident Log				
Shift:			Location	
Date of Incident	Location of Incident	Individuals Involved	Description of Incident	Resolution / Reported By

APPENDIX O: KEY LOG

Key Log						
Location:						
Date	Key #	Name of Individual Signing Out Key/ Initials	Purpose	Time Out	Time Returned	SO initials

APPPENDIX P: DAILY LOG BOOK

Daily Log Book	
Date:	Location:
Event	Description
Notes For Next Shift	
Reported By	Information

APPENDIX Q: MONTHLY SECURITY SYSTEM INSPECTION LOG

Monthly Security System Inspection Log				
Month			Location:	
Security System Component	Inspected By	Functioning (Y/N)	Maintenance Needed / Repairs Made	Signature of Service Provider / Inspector

APPENDIX R: MAINTENANCE LOG

Maintenance Log				
Date:			Location:	
Item Maintained	Maintained By	Functioning (Y/N)	Repairs Made	Signature of Service Provider / Inspector

APPENDIX S: CURRENT THIRD PARTY VENDORS LIST

Current Third Party Vendors List				
Location:			Last Updated:	
Vendor	Address	Phone	Point of Contact	Nature of Relationship

APPENDIX T: DISPENSARY OPENING CHECK LIST

Dispensary Opening Checklist

YES	NO	Opening checklist	
		Did the Security Officer conduct a security sweep of the entire facility prior to opening?	If "No" do not open the facility.
		Was there any sign of forced entry or breached access points?	If "Yes" do not open the facility until the facility is secure and all cash and cannabis are accounted for.
		Is the cash or cannabis storage containers, locked and secured with no sign of tampering?	If "No" do not open the facility until the facility is secure and all cash and cannabis are accounted for.
		Were there any security system alarms activated since the last closing of the facility?	If "Yes" do not open the facility until the facility is secure and all cash and cannabis are accounted for.
		Is the facility opening between the hours of 6AM and 8PM?	If "No" do not open the facility.
		Are there two or more employees present at the opening of the dispensary?	If "No" do not open the facility.
		Are all employees documenting their entry into the facility via the Electronic Access Control System?	If "No" do not open the facility until all employees are documented in the system.
		Are all security system components (alarm, video, access and lighting) functioning?	If "No" do not open the facility.
		Are all state agencies (with a mandatory requirement) able to conduct "live monitoring" of the facility?	If "No" do not open the facility.
		Is the Electronic Verification System (Point of Sale) functioning?	If "No" do not open the facility.
		Are all employees prominently displaying their Agent Identification ID's on their person?	If "No" do not open the facility until employees are.

Ensure you satisfy all of the above conditions prior to opening the facility

APPENDIX U: CLOSING CHECK LIST

Dispensary Closing Checklist

YES	NO	Closing Checklist	
		Have all customers safely left the dispensary?	If "No" do not close the facility.
		Has a through, systematic security sweep been conducted of the entire facility to verify all access points (doors, windows, gates) are secure?	If "No" do not close the facility.
		Are all Cannabis and currency safely locked in the vault?	If "No" do not close the facility.
		Are all security system components (alarm, video, access and lighting) functioning?	If "No" do not close the facility.
		Are all state agencies (with a mandatory requirement) able to conduct "live monitoring" of the facility?	If "No" do not close the facility.
		Has the end of business inventory completed and documented in the Electronic verification system?	If "No" do not close the facility.
		Does the electronic inventory match what is on hand?	If "No" do not close the facility.
		Have all employees exited the facility?	If "No" do not close the facility.

Ensure you satisfy all of the above conditions prior to closing the facility.

EXHIBIT C

Unconditional Agreement and Consent

Pursuant to Section 5 of Crystal Lake Ordinance No. _____ and to induce the City of Crystal Lake to grant the approvals provided for in such Ordinance, the undersigneds acknowledge for the Applicant and its respective successors and assigns in title to the Subject Property that Applicant:

1. Has read and understands all of the terms and provisions of said Ordinance No. _____;

2. hereby unconditionally agrees to accept, consent to, and abide by all of the terms, conditions, restrictions, and provisions of Ordinance No. _____ and any amendments thereto; the UDO; and all other applicable codes, ordinances, rules, and regulations;

3. acknowledges and agrees that the City is not and shall not be, in any way, liable for any damages or injuries that may be sustained as a result of the City's issuance of any approvals or permits for the use of the Subject Property, and that the City's issuance of any approval or permit does not, and shall not, in any way, be deemed to insure the Applicant against damage or injury of any kind and at any time;

4. acknowledges that all public notices and hearings have been properly given and held with respect to the adoption of the Ordinance, has considered the possibility of the revocation provided for in the Ordinance, and agrees not to challenge any revocation on the grounds of any procedural infirmity or any denial of any procedural right;

5. agrees to and does hereby hold harmless and indemnify the City, the City's corporate authorities, and all City elected and appointed officials, officers, employees, agents, representatives, and attorneys, from any and all claims that may, at any time, be asserted against any of these parties in connection with the Subject Property or any City action respecting the Proposed Use of the Subject Property or the Requested Relief, including without limitation the adoption of this Ordinance or granting the approvals to the Applicant pursuant to the Ordinance (or claims relating to any ordinance or code provision pursuant to which the Requested Relief is otherwise authorized), except as may arise from the City's gross negligence or willful misconduct, and provided that the City shall assert its available immunities in connection with such claims. In the event that the City elects to retain separate counsel in defense of any such claims, the Applicant hereby agrees to reimburse the City for its attorneys' fees and costs incurred in connection of such defense of claims; and

6. represents and acknowledges that the persons signing this Unconditional Agreement and Consent are duly authorized to do so on behalf of the Applicant.

Americanna Dream, LLC

BY_____
ITS_____

CL Dispensary LLC

BY_____
ITS_____