



TOWN OF HENRIETTA
County of Monroe
State of New York

475 Calkins Road, Rochester, NY 14623
(585) 334-7700 • www.henrietta.org

TOWN OF HENRIETTA
APPLICATION TO TOWN BOARD
- SPECIAL USE PERMIT -

Appeal No. SP2024-025

Date 6/14/24

Applicant: Urban Pulse, LLC

3740 W Henrietta Rd Henrietta NY 12207

Business Owner: Natalie Rowland

418 Broadway, Suite R Albany NY 12207

Business Name: Urban Pulse, LLC

Business Address: 3740 W Henrietta Rd Rochester NY 14623

Property Owner: 3740 West Henrietta Road, LLC PO BOX 59 Canandaigua NY 14424

36 Princeton Ln Fairport NY 14450

Architect/Engineer: Napierala Consulting Professional Engineer, P.C. John Bessette

110 Fayette Street Manlius NY 13104

Hereby request from the Town Board for a Special Use Permit for the property located at:

3740 W Henrietta Rd Rochester NY 14623
Henrietta 12207
101-15-1-12 Commercial B-1
263200-161-150-0001-012-000 District 05 MURA

If property is under a purchase option, indicate date option expires: N/A

Under the Zoning Ordinance, a Special Permit is requested pursuant to:

Article: V1 Section: 295 Subsection: 14 Paragraph: B13 of the Zoning Ordinance.

Description of Proposal: Application is to apply for a special use permit to operate a cannabis retail dispensary on the property. Proposed hours will be in accordance with city rules/regulations.

Multiple Dwelling Applications – Dwelling Units per Acre: _____

Does this exceed allowed amount per Henrietta Code §295-13[E](1)(b) Yes No

Printed Name: Natalie Rowland

Signature: Natalie Rowland

6/9/24

TWenzel

July 31, 2024

6:00 pm

**Statement of Applicant and Owner with Respect to Reimbursement
of Professional and Consulting Fees**

In conjunction with an application made to the Town of Henrietta, the undersigned states, represents and warrants the following:

- 1) I/We am/are the applicant and owner with respect to an application to the Town of Henrietta.
- 2) I/We have been advised of, are aware of and agree to comply with the obligation to reimburse the Town of Henrietta for any and all professional and consulting fees incurred by the Town in conjunction with this and any other applications by me/us, including but not limited to engineering and/or legal fees, all as more fully set forth in the Henrietta Town Code.
- 3) I/We have been provided with, or have otherwise reviewed the Henrietta Town Code provisions related to the obligation to reimburse the Town with respect to professional and consulting fees, and agree to comply with the same.
- 4) I/We understand that this obligation shall not be dependent upon the approval or success of the application.
- 5) I/We further agree that in the event the Town of Henrietta is required to refer for collection an outstanding debt for such professional and/or consulting fees due to the Town of Henrietta, I/we shall be obligated to pay the reasonable attorney's fees incurred as a result of the Town's efforts to collect such fees. Reasonable attorney's fees shall also include any and all disbursements that may result from the commencement of litigation.
- 6) Each party to the application, including the applicant and the owner, shall be jointly and severally liable for all consulting and professional fees and expenses incurred in conjunction with the application.

Applicant/Business Owner: Urban Pulse, LLC/ Natalie Rowland

By: Natalie Rowland

Title: Member

Dated: 6/9/24

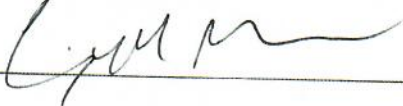
Signed: 

Property Owner: 3740 West Henrietta Road, LLC

By: Craig M Brown

Title: Owner

Dated: 6/10/24

Signed: 

Urban Pulse, LLC
418 Broadway, Suite R
Albany, NY 12207

June 9, 2024

Henrietta Town Hall
475 Calkins Road
Rochester, NY 14623

Subject: Letter of Intent for Cannabis Special Use Permit Application

Dear Members of the Planning Board,

I am writing to submit my Letter of Intent to apply for a Special Use Permit for a cannabis dispensary within the Town of Henrietta. As a young entrepreneur with a passion for providing customers with responsible and sustainably sourced cannabis, and a commitment to community welfare and compliance with state and local laws, I am eager to open a store in Rochester, where I look forward to contributing positively to the town's landscape and economy.

I have retained CannaZonedMLS to assist with my efforts – from licensing to product development to compliance – they have been instrumental in forwarding my plans to open a dispensary in your town. The team at CannaZonedMLS has over 30 years of combined cannabis experience, with a proven track record of establishing and managing businesses that prioritize customer safety, satisfaction, and community values. My intent is to create a dispensary that not only meets the legal criteria set forth by New York State's cannabis regulations but also aligns with Henrietta's standards for business operations and community impact.

The proposed location for this dispensary is 3740 W Henrietta Rd, Henrietta, NY 12207, which is situated in a zone that, per the local zoning laws, can accommodate such an establishment, provided a Special Use Permit is granted. This site was chosen due to its accessibility, compliance with setback requirements, and its capacity to effectively manage customer flow without disrupting the local community.

In line with Henrietta's guidelines, my business plan includes detailed attention to security, with plans to install state-of-the-art surveillance and employ trained security personnel to ensure the safety and security of the premises and its surroundings. Additionally, the operation will adhere strictly to all selling restrictions, particularly those regarding the prohibition of adult use sales to anyone under the age of 21.

Our operation will actively contribute to the local economy by creating jobs, generating tax revenue, and participating in community programs. We intend to hire locally, providing

competitive wages and comprehensive training to ensure that our employees not only contribute to but also grow with the business.

Moreover, I am committed to engaging in an ongoing dialogue with local residents, law enforcement, and town officials to ensure that our establishment operates transparently and continues to meet the evolving needs and concerns of the community.

I am aware of the responsibilities involved in operating a cannabis dispensary and am prepared to adhere to the stringent operational standards required by the state and the Town of Henrietta.

Thank you for considering this letter as part of my application for a Special Use Permit. I am eager to bring this project to life in Henrietta and confident in its potential to make a positive impact. I am at your disposal for any further information or discussion at your convenience.

Warm regards,



Natalie Rowand
Member
Urban Pulse, LLC

July 2, 2024

Town of Henrietta
475 Calkins Road
Rochester, NY 14623


To Whom It May Concern,

I, Craig M. Brown, the owner of the property located at 3740 Henrietta Road, Henrietta, NY 14623, hereby authorize Natalie Rowland, owner of Urban Pulse, LLC, and designees she may appoint, including our engineer, John Bessette of Napierala Consulting, Professional Engineer, P.C., and our consultant, Amanda Kilroe with Cannazoned MLS, to act on my behalf during the Town Board meeting.

This authorization grants Natalie Rowland and her designees the ability to represent my interests, present information, and respond to inquiries regarding the property mentioned above.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig M. Brown', is written over a horizontal line.

Craig M. Brown
Owner
3740 West Henrietta Road, LLC

Urban Pulse, LLC

Authorization Letter

June 9, 2024

Via Electronic Mail (jmiranda@henrietta.org)

Town of Henrietta

475 Calkins Road

Rochester, New York 14623

Attn: Jennifer Miranda


RE: Authorization to Represent in Permit Application

Dear Jennifer,

Please let this letter serve as proof that Urban Pulse, LLC hereby authorizes Amanda Kilroe and CannazonedMLS to represent its interest in its application for a Special Use Permit to operate a cannabis retail dispensary on the property located at 3740 W Henrietta Rd, Rochester, NY 14623. Furthermore, this authorization hereby ratifies any and all conduct already taken by Mrs. Kilroe or CannazonedMLS in its representation of Urban Pulse, LLC on its application.

Thank you,

Urban Pulse, LLC

By:  _____

Natalie Rowland

Member

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EXECUTIVE SUMMARY OF SECURITY PRACTICES

Our number one priority at Urban Pulse, LLC (“Urban Pulse”) is the safety of the public and our employees. We realize we have a serious responsibility, and like the Town of Henrietta (“Town”), a compelling interest in ensuring that cannabis is not distributed in an illicit manner, protecting the public health, safety and welfare of Henrietta’s residents and businesses. By providing residents with safe access to cannabis, Urban Pulse hopes to protect and preserve this community where we hope to operate. Our efforts to fulfill these responsibilities begin with our security policies and protocols, safe dispensing, inventory access and control, strict record keeping, incident response and comprehensive employee training, which are addressed throughout this plan. Urban Pulse is willing to provide any additional information or additional security measures, as requested by the Town.

Serving the community means operating a secure facility. Urban Pulse will have comprehensive security policies and procedures pertaining to all aspects of operations, which address measures to deter and prevent unauthorized entrance into areas containing cannabis goods, as well as diversion, theft, or loss of cannabis goods. These strategies, discussed below, are based on our understanding of operating compliant, safe, and incident free facilities and using state-of-the-art technology. Urban Pulse’s Adult Use Retail Dispensary Facility (“Facility”, “Retail Facility” or “Premises”) will have fully operational alarm and video surveillance systems that, among other capabilities, that are able to operate for twenty-four (24) hours, even in the event of a power outage. Urban Pulse’s integrated electronic surveillance system will improve the safety and security of the surrounding neighborhoods.

We remain flexible in strengthening our security and will cooperate with the Town and local law enforcement security concerns, including adjusting security controls when necessary.

SECURITY OVERVIEW: GENERAL SECURITY POLICIES

Urban Pulse extensive security policies will ensure the creation and maintenance of a secure Facility that will deter and prevent illegal activity from taking place on or near the premises. Security is designed into every aspect of the Facility. The Facility will be equipped with physical and technological features that minimize the risk of diversion, loss, or theft of cannabis goods. Urban Pulse will implement security measures designed to prevent unauthorized entrance into the Facility and theft of cannabis goods from the Premises. Urban Pulse will implement anti-diversion measures, including reinforcing a company-wide culture of responsibility and reporting. All managers will share the discrepancy-resolution and diversion-prevention responsibilities.

The Premises will be monitored by state-of-the-art security cameras and alarm systems, and will be constantly monitored by Urban Pulse employees, as well as a security guard from a private patrol operator. The interior of the entire Facility will be designed and constructed

with security and regulatory compliance as the primary objectives. Cameras and professionally monitored alarms will be installed in every room (except bathrooms) and every access point of the Facility. Outside of hours of operation, all cannabis goods and cash will be stored in a secure inventory storage with motion sensors and other detectors designed to deter any criminal activity.

Urban Pulse will have an active contract with a private patrol operator licensed by the New York Department of State's Division of Consumer Protection. Urban Pulse intends to contract with Paragon, a well-respected national security company with over 14,000 people strong across all fifty states, for its security guards ("Security Guards"). The private patrol operator will furnish our Security Guards. Onsite Security Guards will constantly monitor the parking area outside the Facility, the perimeter of the entire building, the retail sales area, the reception area, the receiving area, the loading and unloading of vehicles area, and the immediate vicinity.

No person will be allowed to enter the retail sales area of the Facility unless he/she is an employee, age-verified customer, vendor or contractor of Urban Pulse. No person under the age of twenty-one (21), without valid proof of identification will be allowed on the Premises, including contractors. All persons entering the Premises must present a photo identification.

Our security policies and measures will include, but not be limited to, all of the following:

- Prohibiting anyone from remaining on Urban Pulse Premises if they will not be engaging in activity expressly related to the operations of Urban Pulse in which they are authorized to engage.
- Establishing limited access areas.
- Implementing procedures to ensure limited access areas will be accessible only to authorized personnel.
- Limiting employee access to sensitive spaces within the Facility, such as areas containing surveillance recordings and secure product storage.
- Adequately illuminating the exterior of the building in the evening with exterior lighting that is shielded and downward facing.
- Utilizing state-of-the-art alarm and video surveillance equipment with remote-monitoring capabilities, including fire and panic alarm systems.
- Exterior and interior camera systems capable of recording any activity on the Premises, including entry points to the property and within the building on the Premises.
- Equipping the Facility with card key access security devices.
- Storing all cannabis goods in secured inventory storage in a manner reasonably designed to prevent diversion, theft, and loss.

- Utilizing state-of-the-art network security protocols and equipment to protect electronic data.
- Installing security systems attached to backup battery system that immediately provides power for at least twenty-four (24) hours in the event of a power outage.
- Employing a private patrol operator to supply qualified Security Guards.
- Storing all cash in a secure inventory storage to prevent theft.
- Taking reasonable measures to control patron conduct, where applicable, in order to prevent disturbances, vandalism, or crowd control problems inside or outside the Premises, traffic control problems, or obstruction of the operation of another business.
- Developing positive relationships with local law enforcement and security experts.

EMPLOYEE-SPECIFIC POLICIES AND TRAINING

Urban Pulse employees are integral in maintaining the security of the Facility. The General Manager will be responsible for ensuring all employees follow policies and procedures regarding the Urban Pulse Facility's security and will implement employee security trainings. All employees will aid in the security of Urban Pulse Facility through prevention, awareness, reporting, and responsible incident management.

EMPLOYEE SECURITY POLICIES

As part of our robust security policies and procedures, all employees will:

- Park in well-lit areas.
- Enter the Facility and disarm the alarm system(s) via the designated door(s).
- Arm the alarm system(s) and exit via the designated door(s) upon exit.
- Receive training on how to use Robbery / Duress Alarm Buttons. These buttons may be fixed or wireless.
- Receive training on common situations such as robbery, verbal or physical aggression and other situations.
- Report any breaches or suspected breaches of security
- Report any incident or suspected incidents of diversion.

EMPLOYEE SCREENING

To establish a secure Facility, we will think critically about internal threats and implement thoughtful employee screening processes to ensure only suitable Urban Pulse applicants are offered employment. In order to minimize insider security threat, Urban Pulse may screen potential employees for signs of potential security risk or unsavory intentions. We may comprehensively investigate the employment and criminal history of all potential hires, maintain high standards for eligibility, and disqualify potential candidates who demonstrate deficiencies in morality, ethics, or character. All employees of Urban Pulse will be twenty-one (21) years of age or older.

Urban Pulse will not hire operators with criminal convictions that substantially relate to the qualifications, functions or duties of their business or profession, including a felony conviction involving fraud, deceit or embezzlement, a criminal conviction for the sale or provision of illegal controlled substances to a minor, or any criminal conviction for a crime of moral turpitude.

Additional standards and controls will be implemented to protect Urban Pulse from insider threat – after onboarding through termination. A thorough and rigorous hiring and human resources management process will aid in the secure and lawful operation of the Urban Pulse Facility. To this end, we will:

- Establish hiring criteria per position;
- Establish disqualifying items for potential candidates, including criminal record, loss of professional license, and disregard of financial and personal obligations including tax payment;
- Have all managers and owners submit to local and state background checks, if applicable;
- Require all personnel to inform the General Manager immediately following any arrest or conviction;
- Perform due diligence on all vendors and contractors prior to establishing a relationship;
- Develop Minimum Internal Controls (MIC) to reduce threats, exposure, and risk;
- Review, as necessary, surveillance video and audio, access control event reports, and personnel access to sensitive spaces; and
- Maintain and improve termination procedures as necessary to ensure terminated employees' credentials, resources, and access to facilities and records are appropriately removed and therefore pose no substantial security risk.

EMPLOYEE ACCESS CONTROL SECURITY POLICIES

When entering the Facility, the retail sales area or any of the limited access areas, Urban Pulse employees will open the entrance door using their credentials or keycard. Urban Pulse employees will only be permitted in areas where they have specific tasks assigned and permissions have been granted. Employees' permissions will include limiting entry to specific location(s) at specific time(s), based on the individual's role, the relationship of the specific task needing to be performed weighed by the need to access the specific area of the Facility, and other factors determined by management. Urban Pulse will have a clear schedule of who should be in what room, at what time. The General Manager will oversee the visual and electronic monitoring of the schedule. Employees will be required to wear Urban Pulse-issued identification badges as described below.

URBAN PULSE-ISSUED IDENTIFICATION BADGE

All agents, officers, or other persons acting for or employed by Urban Pulse will display, at all times while conducting commercial cannabis activity, a laminated identification badge issued by Urban Pulse in a visible, unobstructed manner, above the waist with his or her identification photo visible. Employees will be prohibited from altering, concealing, damaging, or defacing their identification badges in any way. An Urban Pulse-issued identification badge will clearly contain, at a minimum, the following:

- Urban Pulse name and license number;
- The employee's first name;
- The employee's number assigned to that employee by Urban Pulse for identification purposes; and
- A color photograph of the employee that shows the full front of the employee's face and that will be at least one inch (1") by one and a half inches (1 ½") in size.

ASSIGNING ACCESS PERMISSIONS AND URBAN PULSE CREDENTIALS

The General Manager will oversee the management of the keying and coding systems, the assigning and documenting of access permissions, and distributing the necessary credentials. Access permissions will be assigned based on each employee's role with Urban Pulse, as indicated by their job description, to access the areas they will be regularly assigned duties. Only the minimum number of essential employees for efficient operations will be given access to limited access areas.

All Urban Pulse credentials—keys, keycards, PINs, and alarm codes—will be issued on a permanent basis and will be required to be retained in the possession of the employee to

whom it was issued. Credentials may not be transferred directly from one employee to another. All credentials will be documented and tracked with the following information:

- Date issued;
- Time issued;
- Employee name;
- Employee identification badge number;
- Employee photo;
- Term of issuance, if applicable;
- Access credential(s) issued;
- Areas granted permission and time frame for access; and
- Employee and General Manager's signatures.

Urban Pulse credentials may not be loaned and should not be left unattended. Only in an emergency may a credential be issued by a relevant supervisor. When a credential will be issued under these circumstances, the supervisor will notify the General Manager as soon as possible.

MISSING OR LOST ACCESS URBAN PULSE CREDENTIALS

If an employee loses a credential, they will be required to report the loss to their designated manager immediately, who will then report the loss to the General Manager. The General Manager will determine whether the system has been compromised and whether to re-key, re-core, or re-code. Duplication of keys will be strictly prohibited.

RETURN OF ALL CREDENTIALS

When employment with Urban Pulse has been terminated, all credentials will be returned and documented by the General Manager. If applicable, the General Manager will cancel the alarm codes.

EMPLOYEE SECURITY TRAINING

All Urban Pulse personnel will receive procedure specific training in accordance with internal staffing and training policies and procedures. The General Manager is responsible for the

safety and security trainings, as well as ongoing safety and security training and correction of non-compliance in daily operations. All employees will receive training on emergency procedures, safety protocols, and security operations. Employees and agents are required to report any suspicious activity or security concerns to their supervisor or the General Manager immediately as a condition of employment.

EMERGENCY AND INCIDENT RESPONSE TRAINING

Through extensive emergency and incident response training, employees will know:

- Facility floor plans, evacuation plan maps, and preplanned evacuation route.
- Location of alarms, utility cabinets, fire extinguishers, emergency exits, and first aid supplies.
- Not to re-enter the building or allow others to re-enter in the event of an incident.
- Proper response procedures for:
 - IT security breach.
 - Fire, flood, or other natural disaster.
 - Unauthorized entry, robbery, burglary, internal theft, or other Facility security breach.
 - The location of first aid kits.

Urban Pulse employees will immediately dial “911” for any emergency and cooperate with first responders. Urban Pulse employees will call the non-emergency number for local enforcement in the event an employee encounters a non-emergency situation requiring law enforcement assistance.

INCIDENT RESPONSE DRILLS

Urban Pulse will carry out incident response drills as needed. If problems are identified in the response procedures, they will be corrected by the General Manager and employees will be retrained on new procedures. All corrective actions and deficiencies will be documented.

Urban Pulse will implement a training program to ensure that all personnel present at the Premises will be provided information and training that will cover the following topics within thirty (30) days of employment:

- OSHA Standards.

- Health and safety hazards.
- Emergency procedures, including shutdown.
- Security procedures.
- Any additional information reasonably related to an employee's job duties.

RETAIL FLOOR TRAINING

All employees working on the retail floor will receive training on:

- The processes and equipment used by Urban Pulse for customer interaction and sale of cannabis.
- Security protocols and procedures.
- Quality control protocols and procedures.

Prior to independently engaging in Urban Pulse cannabis retail operation, the employee will be provided information and training related to:

- An overview of the Urban Pulse process and standard operating procedures.
- Proper and safe usage of equipment or machinery.
- Safe work practices applicable to an employee's job tasks, including appropriate use of any necessary safety or sanitary equipment.
- Cleaning and maintenance requirements.
- Emergency operations, including shutdown.
- Any additional information reasonably related to an employee's job duties.

RETRAINING

Retraining will be conducted for personnel whenever there are:

- Changes in Urban Pulse operations that render previous training obsolete.
- Changes in the types of security equipment or protocols needed to be used render previous training obsolete.
- Inadequacies in an employee's knowledge or performance of job functions indicate the employee has not acquired the requisite understanding or skill.

TRAINING RECORDS

Urban Pulse will maintain records of any training received by employees for the performance of all assigned functions for a minimum of seven (7) years. Each record of required training will include:

- Name of employee that received the training.
- Content of the training provided.
- Employee identification badge number.
- Signed annual attestation by an Urban Pulse manager that the employee has received and understood all information and training provided in the training program.
- Signed statement from the employee indicating the date, time, and place of training.
- Dates of training completion for all personnel.
- Dates of refresher training completion for all personnel and content of the refresher training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The General Manager will maintain all Urban Pulse training records and logs in each employee's personnel file. Urban Pulse will maintain a list of all personnel at the Premises, including the name and job duties of each.

EVALUATION OF TRAINING CONTENT

The General Manager will solicit feedback on the quality and efficacy of training from employees who received the training. The General Manager may also solicit feedback from customers, vendors, consultants, and other stakeholders about the competence of Urban Pulse employees in the areas that the trainings address. Feedback solicited from these stakeholders will address the quality of interactions with employees, any policies or procedures directly affecting the stakeholder, and any changes in the way Urban Pulse will be perceived by the stakeholder. The General Manager will ensure training content, including content presented by third-party trainers, meets the needs and requirements of Urban Pulse.

INFORMATION TECHNOLOGY SECURITY

Urban Pulse utilizes state-of-the-art network security protocols to protect electronic data. The General Manager will ensure the security of Urban Pulse hardware, software, data, and communications networks, including the following information technology (“IT”) maintenance:

- Software registration
- Employee IT security training
- Security patches
- Vulnerability assessments
- Malicious software prevention
- Security status and network access monitoring
- Account management
- Disposal and redeployment

IT PASSWORD REQUIREMENTS

Urban Pulse will ensure all computer systems require password changes. All employee passwords for software and network access will be changed every six (6) months.

PROTECTED INFORMATION

Access to protected information, which may include data, records, plans, and matters relating to customers, vendors, tenants, employees, agreements, network data, passwords, floor plans of critical areas, and business records (collectively “Confidential Information”), will be restricted to essential employees only. Access may be granted to authorized representatives of the Office of Cannabis Management (“OCM”), the Town, and any other authorized law enforcement official, and other government officials if necessary to perform their official duties (“Recipients”). To the extent Confidential Information is acquired without a warrant from access to the Facility, Recipients will, to the maximum extent possible, keep such Confidential Information confidential and not disclose the Confidential Information to any third parties. To the extent such Confidential Information is necessary and relevant to any criminal action against the business owner or operator or agents, Recipients must file such documents under seal to the extent they contain any Confidential Information.

Notwithstanding the foregoing, the Town may disclose Confidential Information as may be required by the New York Freedom of Information Law (“FOIL”) or pursuant to a civil subpoena, provided however, the Town will notify the operator and provide the operator with a reasonable opportunity to obtain a protective order before disclosing the Confidential

Information; or in connection with any Town enforcement proceeding relating to compliance with Town's Municipal Code and this section, but only to the extent the Confidential Information is relevant to the proceeding.

VISITOR SECURITY

All persons who are not Urban Pulse employees may be permitted in the Facility in accordance with the rules set forth by state and local laws, regulations, ordinances, and other requirements. The Security Guard will confirm the visitor's identity, and the Receptionist will verify the purpose of the visit and issue a visitor identification badge before the visitor will be allowed access to the Facility.

Upon arrival to the Facility and upon entrance into the reception, the visitor will communicate the purpose of his or her visit to a Security Guard and show the Security Guard their government-issued photo identification, which has a photo, birthdate and signature. The Security Guard will scan a copy of the visitor's identification and upload it into the *Visitor Registration Log*. The Security Guard will be required to enter the following information in the *Log*:

- Date;
- Time of arrival;
- Purpose of visit and name of the company for whom the individual works;
- Visitor's full name;
- Valid government-issued identification number;
- Facility-issued visitor identification badge number; and
- Time of departure.

Once the Security Guard has verified that all information is accurate and that the name on the identification matches the name in the *Visitor Registration Log*, a visitor identification badge may be issued.

VISITOR ESCORTING AND MONITORING

Visitors will be escorted by an authorized employee and monitored by security cameras while in the Facility. Visitors will be prohibited from entering any limited access areas, unless required for provision of services. Visitors in limited access areas where cannabis goods will be present will not be permitted to touch any cannabis goods.

UNAUTHORIZED OR DENIED VISITORS

Visitors who refuse to comply with Urban Pulse visitor policies and rules set forth by applicable state and local laws, regulations, ordinances, and other requirements will be denied entry by the Security Guard. Any person refusing to leave the Premises should be considered an incident and handled in accordance with the incident response procedures.

VISITOR IDENTIFICATION BADGE

Visitors, including contractors, external providers, and authorized representatives of the Town, and other government officials will obtain a visitor identification badge from the Security Guard before gaining access to the Facility. All individuals including, an outside vendor or contractor, will be at least twenty-one (21) years of age to be issued a visitor identification badge.

All visitors will be escorted by a Urban Pulse employee while in the Facility and will be required to visibly display the visitor identification badge above the waist at all times. At the point in time that the visitor will no longer be engaging in activity expressly related to the operations of Urban Pulse, the visitor will return the visitor identification badge to the Security Guard and be required to leave the Premises.

FACILITY SAFETY: SECURE LOADING AND UNLOADING AREA

Urban Pulse Facility is equipped with a separate, back entrance designated for accepting shipments of inventory for Urban Pulse retail sales operations. In order to facilitate driver safety and security, shipments of cannabis goods will only be received within a designated limited access receiving area, accessible through this non-public entrance. Urban Pulse will not accept any shipment of inventory through the public entrance.

On-duty Security Guards will supervise all receiving activities and maintain security in the designated unloading area. At a minimum, Urban Pulse receiving area will be secured with the following:

- Access control points.
- An alarm system that is equipped with silent alarm capability to notify management and law enforcement of a potential intrusion.
- Video surveillance of all entry and exit points, produced with enough clarity to allow facial recognition.

PERIMETER SECURITY

The perimeter will contain lighting systems that allow for after-hours security. Security cameras will be installed to allow for the clear identification of any persons entering the Facility. Perimeter doors will have automatic door closing hardware and will automatically lock. Perimeter doors will have the appropriate commercial grade hardware and locks installed and maintained. Unauthorized entry or exit will generate a local alarm sounder and report to the alarm company.

The Facility will have a single and plainly marked door for visitors, vendors, deliveries, and other non-retail customer use. The Facility will have a separate public entrance for customer use. All doors other than the customer entrance will remain locked at all times. Staff will electronically or physically release the door locks to allow entry into the Facility by pressing a door release button or actually opening the door physically.

The Premises and its infrastructure will be continually maintained so that it is visually attractive and not dangerous to the health, safety and general welfare of employees, patrons, surrounding properties, and the general public. The Premises will not be maintained in a manner that causes a public or private nuisance. The Premises will not provide outdoor seating areas and will not permit outdoor seating of any kind in or around the Premises.

Whenever the Facility will not be open for retail sales, Urban Pulse will ensure that the Premises will be securely locked with commercial-grade, non-residential door locks and will be equipped with an active alarm system. All cannabis goods will be stored in a locked and secure inventory storage and only authorized employees and contractors of Urban Pulse will be allowed to enter the Premises after hours. Cannabis, cannabis products, or related supplies will never be stored outside.

LIGHTING

Urban Pulse will provide adequate interior and exterior lighting for safety and security. Exterior lights at all points of entry and exit will provide sufficient illumination to allow surveillance cameras to capture clear images in all lighting conditions. Lighting on the exterior perimeter of the Premises will deter suspicious activity and will be placed in a manner that ensures it does not negatively impact surveillance image quality when cameras are in night vision mode. The exterior of the Facility, including the parking areas and public walkways will be lit by commercial metal halide fixtures sufficient to facilitate surveillance. All exterior lighting will be fully shielded, downward casting and not spill over onto structures, other properties, or the night sky. Exterior lighting on the Premises will be balanced to complement the security and surveillance systems to ensure all areas of the Premises are visible and will provide increased lighting at all entrances to the Premises.

All exterior lighting will be in compliance with local regulations relative to dark skies or other applicable laws. Interior lighting will be maintained to provide both a safe working environment and provide for enhanced security. A sufficient amount of lighting may be left on 24/7 in areas visible from the exterior to discourage intrusion and permit visibility from the exterior by local police or other patrols. Emergency Exit Lighting will be provide for all areas as well as exits.

INGRESS AND EGRESS ACCESS

Urban Pulse will have comprehensive access control procedures to deter and prevent unauthorized entrance into the Facility and its retail sales area and limited access areas. Urban Pulse access control procedures will be compliant with the rules set forth by the OCM and all applicable state and local laws, regulations, ordinances, and other requirements. All security measures will be reasonably designed to prevent unauthorized entrance into areas containing cannabis goods and theft of cannabis goods from the Premises.

Exterior doors, as well as limited access area entries, will be automatic locking and equipped with electronic keycard access hardware. All entrance doors to every limited access area will remain locked and closed when not in use during regular business hours. Secondary entrances such as windows, roofs or ventilation systems will be physically secured to prevent unauthorized entry, if applicable.

Urban Pulse will ensure that trees, bushes and other foliage outside of the Premises do not allow people to conceal themselves from sight. The surveillance system's cameras will be capable of identifying persons, license plates, vehicles, the immediate surrounding areas, and any activities occurring within the Premises and within twenty feet (20') of all entry and exit points of the Premises.

PRODUCT SAFETY AND SECURITY (AT ALL HOURS)

Urban Pulse will develop and implement procedures that ensure product safety and security and will be compliant with the rules set forth by state and local laws, regulations, ordinances, and other requirements.

Product safety and security procedures will include, at a minimum, measures that minimize the risk of diversion or theft of cannabis goods and ensure proper storage conditions that maintain the quality and purity of Urban Pulse cannabis goods.

PRODUCT STORAGE CONDITIONS AND SECURITY MEASURES

Urban Pulse will store all cannabis inventory at the Facility in accordance with Urban Pulse security measures. All cannabis inventory, except for limited amounts of cannabis used for display purposes, samples, or immediate sale, will be stored in the secured inventory storage within a limited access area of the Facility and tracked in Urban Pulse selected inventory tracking system, Dutchie, and mandated statewide track and trace system.

Access to secure inventory storage will be limited to the minimum number of authorized personnel for efficient operations. Storage policies and procedures will include, at a minimum:

- Limit access of personnel within the Premises to those areas necessary to complete job duties, and to those time frames specifically scheduled for completion of job duties.
- Minimize the risk of diversion or theft of cannabis by supervising tasks or processes with high potential for diversion such as the receiving of cannabis goods.
- Providing designated areas in which personnel may store and access personal items (e.g., lockers within the employee common area).
- Ensure proper storage conditions that maintain the quality and purity of Urban Pulse cannabis products.

SECURED INVENTORY STORAGE

The secured inventory storage is dedicated to storing retail products, including cannabis goods and cash. The secured inventory storage will be monitored perpetually by cameras, have adequate lighting control, and access will be electronically recorded. Electrical systems in the vaults will have emergency backup power.

PREVENTION OF DIVERSION

Urban Pulse utilizes a comprehensive inventory tracking system, Dutchie, to keep record of all cannabis goods received and sold/delivered. Dutchie will integrate with the state-mandated track and trace system, METRC, so both inventory tracking systems can track and report on all aspects of the business including but not limited to, cannabis tracking, inventory data, gross sales (by weight and by sale), and other information deemed necessary by the Town.

The system will also produce historical transactional data for review. Urban Pulse will document and record, at minimum, the following information:

- Purchase order number.

- *Shipping Manifest*.
- Date and time of acquisition.
- Description of the cannabis and cannabis products acquired, including the amount, strain, and batch number.
- Name and registration/license number of licensed distributor.
- Name of licensed distributor's employee distributing cannabis and cannabis products to Urban Pulse.
- Name and employee identification number of Urban Pulse employee receiving the cannabis and cannabis products.
- Copies of purchase order, employees' identification card, and other supporting documentation.

SHIPPING MANIFESTS

Urban Pulse will not accept any shipment of cannabis goods without receiving a copy of a *Shipping Manifest* from a licensed distributor conducting the shipment. Upon receiving shipments of inventory from licensed distributors to Urban Pulse Facility, all cannabis goods package counts, labeling and actual weights will be reconciled before accepting the cannabis goods. Urban Pulse will verify that the cannabis goods being taken into possession are as described and accurately reflected in the *Shipping Manifest*. Urban Pulse may verify the cannabis goods are accurately reflected in the *Shipping Manifest* by confirming the number of boxes of cannabis goods, type of cannabis goods and/or weight or units of cannabis goods. Urban Pulse will not take into its possession any cannabis products that are not on the *Shipping Manifest* or any cannabis goods that are less than or greater than the amount reflected on the *Shipping Manifest*. Any discrepancy in weight or package count will be identified and reported immediately.

Upon receipt of cannabis goods for inventory, Urban Pulse will ensure the cannabis goods received are as described in the *Shipping Manifest* and will record acceptance and acknowledgment of the cannabis goods in the track and trace system. If there are any discrepancies between the type or quantity specified in the *Shipping Manifest* and the type or quantity received, Urban Pulse will record and document the discrepancy in the track and trace system and in any relevant business record. Upon receipt of the transported shipment, Urban Pulse will submit a record verifying receipt of and details regarding the shipment to the OCM. Urban Pulse will maintain all *Shipping Manifests* for a minimum of seven (7) years and make them available to the OCM, the Town, and any law enforcement or other applicable governmental agencies upon request.

SALES INVOICES

Every sale or transport of cannabis or cannabis products will be recorded on a sales invoice or receipt. Sales invoices and receipts may be maintained electronically and will be filed in such manner as to be readily accessible for examination by employees of the OCM or New York Department of Taxation and Finance and will not be commingled with invoices covering other commodities.

SUPERVISED USE OF INVENTORY TRACKING SYSTEMS

To prevent diversion and to ensure compliant inventory control, only authorized employees that have been trained on the proper and lawful use of the inventory tracking program will be granted access credentials. Employees will use their own credentials to log into the inventory management systems and every authorized user will enter data into the inventory management systems in a manner that fully and transparently accounts for all inventory management activities conducted at the Facility.

Urban Pulse will track all employees' actions while they are connected to the inventory tracking system. A forensic report will show a log of the time, date, and action of a specific individual as it pertains to inventory items. Every tracking system user will be trained to ensure that every action completed while he or she is connected to the inventory management systems or is performing other inventory management activities involving cannabis is compliant with the rules set forth by the OCM and all applicable state and local laws, regulations, ordinances, and other requirements.

Urban Pulse employees understand that inventory management systems access is a revocable privilege and will acknowledge, as a condition of employment and systems access, that he or she will be responsible for ensuring the accuracy of all information entered into the system on behalf of Urban Pulse.

INVENTORY COUNTS AND RECONCILIATION

In order to ensure the security and accurate tracking of Urban Pulse cannabis inventory, management will perform frequent inventory counts and reconciliations. Counts and reconciliations will be performed to verify that physical inventory matches Urban Pulse records pertaining to inventory, and the results will be documented and retained in Urban Pulse Facility records. If Urban Pulse finds a discrepancy between the physical inventory and the statewide monitoring system or inventory records, Urban Pulse will commence an internal audit.

The Urban Pulse staff member performing the audit will:

- Review any discrepancies and document any adjustments made in the internal inventory tracking system and/or statewide monitoring system, as appropriate or required; and
- Report any discrepancies identified during inventory audits to the OCM and appropriate law enforcement authorities, if appropriate or required by OCM or Town regulation.

The performance of audits and inventory counts ensures the quick identification, investigation and resolution of discrepancies and errors that may occur. All inventory audits and reconciliations will be recorded in the inventory tracking system and reconciled with existing inventory records.

In addition, the General Manager will perform a periodic review of system administrators and responsible personnel to prevent diversion opportunities. Any inventory discrepancies discovered by any employee must be reported immediately. Management will monitor inventory on a daily basis, and the General Manager must approve the reconciliation entry of any inventory discrepancy.

All personnel will be required to comply with Urban Pulse security and inventory policies and procedures as a condition of employment. Such policies and procedures will be reviewed and updated as frequently as necessary to ensure Urban Pulse inventory control and diversion prevention practices are effective and continue to be conducted in full compliance with applicable state and local laws, regulations, ordinances and other requirements.

INTERNAL SECURITY MEASURES FOR LIMITED ACCESS AREAS

Urban Pulse will utilize a comprehensive access control system and corresponding procedures to deter and prevent unauthorized entrance into the Facility and its limited access areas. Strategic design of the Facility involves the use of commercial-grade non-residential doors and locks, an alarm system and the use of surveillance equipment to monitor and prevent unauthorized access. Urban Pulse access control system and procedures will be compliant with all applicable state and local requirements. Urban Pulse will have comprehensive access control procedures to deter and prevent unauthorized entrance into the Facility and its limited access areas.

Urban Pulse access control equipment will consist of the following, at a minimum:

- Electric strike locks on doors in the Facility with the ability to override access control for emergency exit even during a power outage.
- Electronic keycard access control devices for all doors entering or exiting a limited access area and all exterior entrances and exits into the Facility.

- Access control system that allows for programming or uploading individual user permissions and allowed entry times, as well as operations-specific information including employee photos.
- Access control system that monitors and records:
 - Identification of employees or visitors entering and exiting.
 - Date and time of entry and exit.
 - Length of time in specific area.
 - Any unauthorized attempts for access.
- A backup battery system that immediately provides power for at least twenty-four (24) hours in the event of a power outage.

LIMITED ACCESS AREAS

Limited access areas will be separate, designated areas that will be secured with strict security measures and locked at all times with non-residential, commercial-grade electronic access locks. Please see the attached floor plans to see the limited access areas, listed below. Each limited access area will be monitored at all times via surveillance cameras. Limited access areas will only be accessible by Urban Pulse employees, the Town, and other authorized individuals who are conducting business that require access to the limited access area. Unauthorized individuals will not be permitted to enter limited access areas at any time for any reason. Urban Pulse will not receive consideration or compensation for permitting an individual to enter Urban Pulse limited access area.

Limited access areas, at a minimum, will include the following rooms and areas:

- Vault (Secured Inventory Storage Area) with Secure Cannabis Trash Storage;
- Order Preparation Area;
- Point of Sales Stations;
- General Manager (“G.M.”) Office and Cash Room; and
- Security Equipment Room.

RETAIL SALES AREA

The retail sales area is a restricted access area where cannabis goods are displayed for retail sale and retail sales are conducted. This restricted access area will only be accessible to

Urban Pulse employees, age-verified patrons, and other authorized individuals with a bona fide reason to enter the Premises.

Consumers will only be granted access to the retail sales area after an Urban Pulse staff member has identified the individual as being twenty-one (21) years of age or older. Acceptable proof of identification includes a document issued by a federal, state, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to:

- a valid motor vehicle operator's license, that contains the name, date of birth, physical description, and picture of the person;
- a valid identification card issued to a member of the Armed Forces that includes a date of birth and a picture of the person; or
- a valid passport issued by the United States or a foreign government.

Any valid proof of identification provided must clearly indicate the age or birthdate of the individual and display an unobstructed photo of the individual seeking access.

Urban Pulse will utilize visual inspection technique as well as an electronic identification scanner to verify the proof of age of every person seeking to purchase cannabis goods. All employees will be trained on proper visual inspection techniques and the use of electronic identification verification equipment. The electronic identification verification scanner is a device capable of quickly and reliably confirming the validity of certain types of identification cards. Urban Pulse will utilize the Viage Cav-3200 ID Verification Scanner, or another comparable device to supplement consumer screening and validation processes. This type of scanner is equipped with a magnetic stripe scanner, barcode scanner, as well as a 1D and 2D scanner of government issued driver's licenses and identification cards for compatibility with all states. This type of technology can easily spot a fake or expired ID. An Urban Pulse employee can verify the validity of identification provided by swiping an identification card through the scanner (like a credit card processor), after which the screen will quickly display the person's age, date of birth, and expiration date.

Urban Pulse required age verification process cannot be completed with *only* the use of an electronic identification scanner verifying proof of age. Physical inspection of identification is always required to confirm accuracy and judge the authenticity of the identification presented. Urban Pulse employees are required to take physical control of the identification and require removal from wallets or covers for inspection, if applicable. Some forms of identification, like passports, are not compatible for verification by certain electronic identification scanners. Furthermore, electronic identification scanners do not reject legal identification being used by another individual nor are they 100% error proof at rejecting false identification. Verification scanners are required to be used as a supplement to a Urban Pulse employee's thorough visual inspection of the identification provided and an analysis as to whether the photo identification provided matches the individual seeking to purchase cannabis goods.

Individuals not engaging in activity that is expressly related to the operations of Urban Pulse Retail Facility will not be permitted to remain on the Premises. After a consumer purchases his or her cannabis goods, the consumer will be required to immediately leave the Premises. If a person refuses to leave after a request, the employee responsible for identification screening and verification will notify on-duty security personnel and, if appropriate, local law enforcement for assistance. There will be at least one employee present in the retail area at all times when individuals who are not employees are present in the retail area.

PUBLIC ACCESS AREAS

Public access areas include the reception area, where consumers will be checked in by Urban Pulse staff to ensure they are of the proper age and have the proper documentation to enter Urban Pulse retail sales area. Public access areas also include areas surrounding the Facility where the public may gain access, which include the public right-of-way and the parking areas. Public access areas will be monitored at all times via security cameras. No unauthorized persons will be allowed to pass a public access area. A Security Guard will be placed at the entrance where the public may gain access and will also patrol areas surrounding the Facility.

TYPES OF SECURITY EQUIPMENT & SYSTEMS

Urban Pulse Facility will be constantly monitored by security surveillance cameras that are on motion sensors, and capable of recording any activity on the Premises, including entry points to the property, and within the building on the Premises, including all entrances, exits, perimeter windows and all areas where customers and employees may have access, with the exception of any restroom area.

All security cameras will record twenty-four (24) hours per day, seven (7) days per week. The security cameras will be equipped with a web-based surveillance system that is monitored at all times. All cameras and the recording system will be of adequate, state-of-the-art quality, color rendition and resolution that allows for the ready identification of any individual committing a crime on the Premises and capturing license plates entering and exiting the Premises.

In addition to the security surveillance system, Urban Pulse will install lighting and alarms to ensure the safety of all persons and to protect the Premises from theft.

All equipment will be compliant with the rules set forth by the OCM and all state and local laws, regulations, ordinances, and other requirements. Security equipment will be installed and monitored by a commercial, licensed service provider. The alarm system and video

surveillance system will include a failure notification system that notifies the alarm monitoring service provider and the General Manager of any system failure or interruption via audio, text, visual, or audiovisual message, within a maximum of five (5) minutes of such failure. Additionally, an alarm will signal the Security Guard on duty whenever an unauthorized entry is attempted.

To be confident our security surveillance system and alarm equipment are working properly to maintain the Facility's security and ultimately security for the surrounding community, Urban Pulse will regularly test all security equipment. Urban Pulse will regularly schedule and oversee all required maintenance of surveillance equipment in accordance with manufacturer recommendations. Any equipment failure identified will be corrected as soon as possible. Urban Pulse will repair or replace any failed component of the alarm or video surveillance system within twenty-four (24) hours. On an annual basis, all security equipment will be inspected, and all devices tested by a security system vendor to ensure the system receives all proper maintenance.

DESCRIPTION OF URBAN PULSE SECURITY ALARM SYSTEM

The alarm system will consist of a fire alarm, panic alarm, and "perimeter mode," that will arm all doors once patrons have left, but not the motion detectors. Motion sensor lighting and alarms will be installed throughout the Facility. The primary alarm system operating equipment will be kept in the Security Equipment Room.

Security equipment, such as commercial-grade metal doors, high-security door contacts, and motion sensors will secure all entry points. The alarm system will also consist of the following:

- Appropriate equipment necessary to monitor activity inside and outside the Facility.
- A panic alarm (an audible security alarm system signal generated by the manual activation of a device intended to signal a life-threatening emergency requiring a law enforcement response).
- Panic buttons will be installed in places throughout the Facility so that employees have easy access. All employees will be properly trained on the use of panic buttons.
- A holdup alarm (a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress).
- A duress alarm (a silent security alarm system signal generated by the entry of a designated code into an arming station to signal that the alarm user is being forced to turn off the system).
- Motion detection devices tied to the surveillance monitoring system.

- Failure notification system that signals the alarm monitoring provider of any system error within a maximum of five (5) minutes.
- A backup battery system that immediately provides power for at least twenty-four (24) hours in the event of a power outage.
- The system will also be compliant with all local alarm ordinances and permit requirements such as those that may be mandated by the Town or the Department of Public Safety.
- Master Control Panel to be capable of providing multiple partitions controlled by separate keypads.
- System will be capable of having multiple user codes and levels of authority and capable of accepting a duress code at keypad level or other soft keys specifically assigned as duress buttons.
- System will be capable of reporting opening and closing events by individual user ID. Such events will be logged and maintained for minimum of ninety (90) days.
- All points of detection (motion detectors, door contacts, etc.) are to be supervised at the control panel level. Loss of supervision will result in an immediate alarm.
- Motion detectors are to employ dual technology (PIR and Microwave), have tamper detection.
- Master Control Panel will be mounted in a secure room or location.
- System to be capable of remote programming for routine service issues and the addition or deletion of user codes.

ALARM SYSTEM TESTING

Urban Pulse will annually, in the presence of the alarm system service provider, conduct an onsite inspection and test of the entire alarm system to determine needed repairs and adjustments.

SURVEILLANCE SYSTEM AND EQUIPMENT

Urban Pulse will have a fully operational electronic surveillance system installed at its Facility that complies with all applicable state and local laws, regulations, ordinances, and other requirements.

Urban Pulse will utilize a web-based, enterprise level network video surveillance system that continuously and distinctly monitors and records the entire Premises twenty-four (24) hours

a day, seven (7) days a week and at a minimum of fifteen (15) frames per second. The surveillance system will include both video surveillance and access control surveillance equipment and features.

The video surveillance system will include a digital archiving device and monitors that will be connected to the electronic recording security system at all times. There will be a twenty-four (24) hour live feed with motion-activated recording capabilities from all video cameras.

The system will have the ability to immediately produce a clear color still photo from any camera image, either live or recorded. A date and time stamp will be embedded on all recordings and will be synchronized, set correctly and not significantly obscure the picture.

The system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no tampering or alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.

The Security Equipment Room will contain all electronic monitoring equipment for the alarm and video surveillance system and will be a secured limited access area accessible only to authorized employees. The main system and at least two (2) high resolution video monitors will be kept in the room.

Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no tampering or alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.

The video surveillance system will have the following features:

- A backup battery system that immediately provides power for at least twenty-four (24) hours in the event of a power outage.
- Cameras will be deployed to provide observation of and sufficient lighting to allow facial feature identification of persons in interior and exterior areas where cannabis or cannabis products is present at any time.
- Cameras are to be capable of Day / Night recording (separate IR Illuminator may be acceptable) and provide high-definition quality images.
- Sufficient camera fields of view and lighting to allow facial feature identification of persons in the immediate exterior areas of doors, windows, or other potential access points twenty feet (20') on either side and out from every door.
- Exterior cameras to be vandal resistant.

- Video will be time and date stamped.
- All camera wiring is to be Cat 6 or better.
- All cameras will be permanently mounted and in a fixed location.

CAMERA COVERAGE AND PLACEMENT

Interior and exterior cameras, capable of recording areas under all lighting conditions, will monitor the Facility. The video surveillance cameras will be fixed in permanent locations, in a manner that will prevent them from being readily obstructed, tampered with, or disabled. All cameras and the recording system will be of adequate quality, color rendition, resolution and placement to allow the sufficient identification of any individual committing a crime on the Premises as well as license plates entering and exiting the Premises. Urban Pulse will ensure visibility of activities will not be obstructed by lighting equipment covers, fixtures, or other equipment. There is no doubt that the cameras and recording system will be capable of sufficiently identifying any individual committing a crime on the Premises.

Exterior Facility lighting will be sufficient to allow the ready identification of any individual onsite. Urban Pulse will install security cameras to monitor and record all areas of the Facility including:

- All points of ingress and egress to the Facility and to limited access areas, including both indoor and outdoor vantage points.
- The secure inventory storage.
- All limited access areas.
- All areas where cannabis goods will be present, including where cannabis goods will be stored, quarantined, unloaded, or moved within the Premises.
- All areas where cash will be counted, transferred, or stored.
- All areas where records will be stored.
- Areas where cannabis will be destroyed.
- Security Equipment Room.
- Areas storing a surveillance-system storage device with at least one camera recording the access points to the area.
- The retail area, including point-of-sale areas and areas where cannabis goods will be displayed for sale; and.

SURVEILLANCE TESTING

All security equipment will be kept in good working order and be inspected and tested at regular intervals. Urban Pulse will ensure that the surveillance system will be properly maintained for playback quality so that images can be seen and the identity of all individuals and activity in surveillance areas will be captured.

Urban Pulse will regularly schedule and oversee all required maintenance of surveillance equipment in accordance with manufacturer recommendations. Any equipment failure identified will be corrected as soon as possible. Urban Pulse will repair or replace any failed component of the video surveillance recording system within twenty-four (24) hours, unless notice will be provided to the OCM or other state licensing agency and an extension will be approved. On an annual basis, security equipment will be inspected, and all devices tested by an appropriately licensed vendor, if not the security company that installed the system.

SURVEILLANCE COMMUNICATION

The surveillance system will include a failure notification system that alerts the Safety and General Manager of any interruption in surveillance and/or the complete failure of the monitoring system. Within a maximum of five (5) minutes of such failure via audio, text, visual, or audiovisual message.

INCIDENT RESPONSE

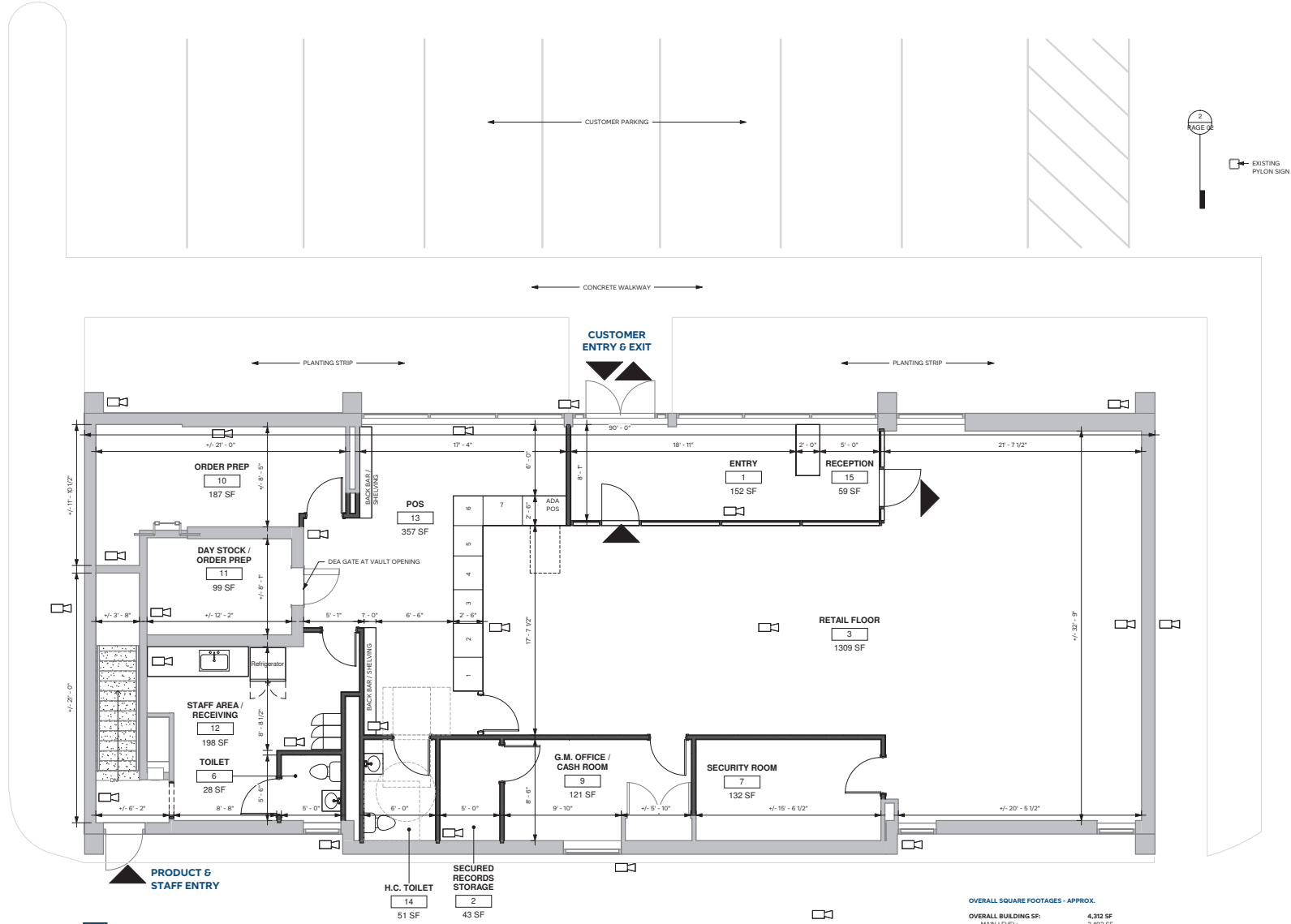
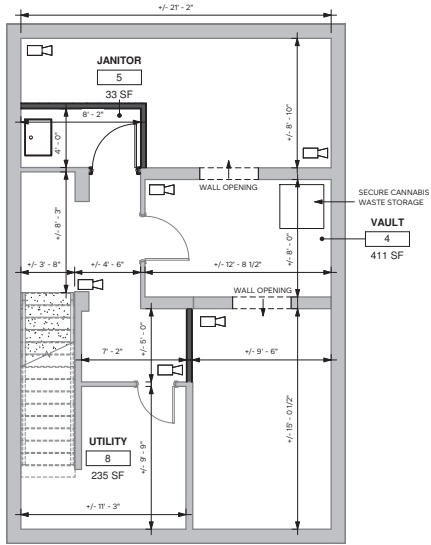
Urban Pulse will establish incident response procedures addressing any incident that may occur, including natural disaster, unauthorized access, theft, or IT security breach. Procedures will be in accordance with the rules set forth by the OCM and all applicable state and local laws, regulations, ordinances, and other requirements. Procedures for general emergency and incident management, containment, and corrective measures will be thoroughly detailed. The General Manager will be responsible for ensuring the appropriate response procedures will be followed. All employees will receive incident response training quarterly to ensure our staff is prepared for any particular incident that may arise and the best way to dispel and contain all incidents. All employees will be trained to monitor for suspicious recommendations, unusual usage, or questionable disposition of cannabis.

The General Manager will notify appropriate law enforcement authorities and the OCM as soon as possible and not more than twenty-four (24) hours after the discovery of a reportable incident as defined by the OCM, state and local laws, regulations, ordinances, and other requirements.

Reportable incidents can include, but will not be limited to:

- Theft or physical loss of cannabis goods;
- The licensee discovers diversion, theft, loss, or any other criminal activity by an agent or employee of the licensee pertaining to the operations of the licensee;
- Significant discrepancies identified during inventory. A significant discrepancy in inventory of cannabis goods means a means a difference in actual inventory compared to records pertaining to inventory of at three percent (3%) of the average monthly sales of the licensee;
- Loss or unauthorized alteration of records related to cannabis goods, or employees or agents;
- Any other crime related to cannabis goods;
- Any suspicious act involving the sale or distribution of cannabis goods by any person;
- Sale to minors;
- Unauthorized destruction of cannabis goods;
- An alarm activation or other event that requires a response by public safety personnel;
- Integrity of the inventory tracking system compromised;
- Breach of network servers;
- Robbery or unauthorized entry in the Facility;
- Threats of violence to the Facility, employees, or visitors; or
- Any other breach of security.

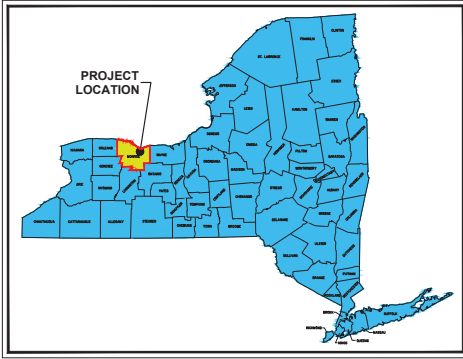
OVERALL FLOOR PLANS



OVERALL SQUARE FOOTAGES - APPROX.

OVERALL BUILDING SF:	4,312 SF
MAIN LEVEL:	2,493 SF
PUBLIC SPACE:	1,722 SF
BOH SPACE:	1,769 SF
LOWER LEVEL:	819 SF
BOH SPACE:	819 SF

ALL AREAS AND DIMENSIONS ARE APPROXIMATE.



SITE LOCATION MAP
NOT TO SCALE

URBAN PULSE

3740 W. HENRIETTA RD.

ROCHESTER, NY 14623

TOWN OF HENRIETTA
MONROE COUNTY
NEW YORK

PREPARED BY:



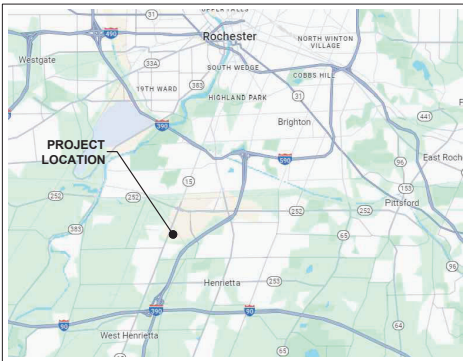
**NAPIERALA
CONSULTING
PROFESSIONAL ENGINEER, P.C.**
SITE • DESIGN • ENGINEERING

110 FAYETTE STREET
MANLIUS, NEW YORK 13104
email: MNAP@NAPCON.COM
PH: (315) 682-5580 FAX: (315) 682-5544

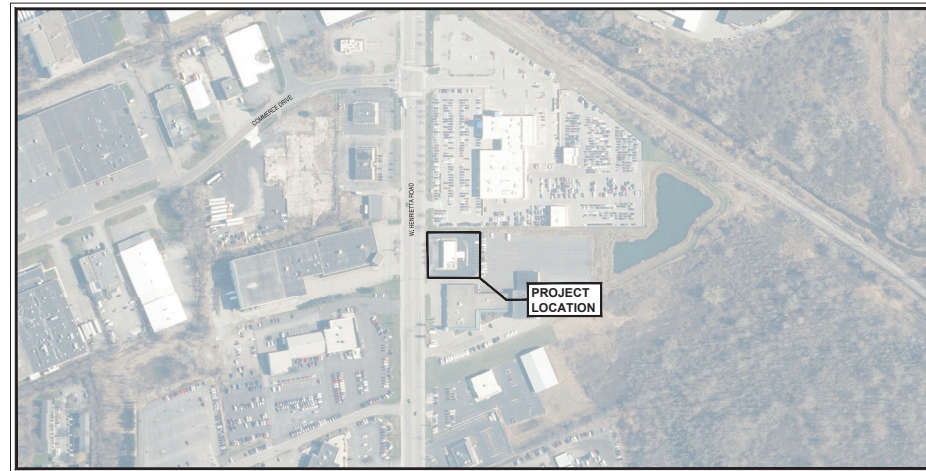
PREPARED FOR:



Canna Zoned MLS
2207 ORCHARD LAKE RD.,
SYLVAN LAKE, MI 48320



PROJECT LOCATION MAP
NOT TO SCALE



AERIAL MAP
1"=200'

SHEET INDEX:

TITLE SHEET	C-1
SURVEY / EXISTING CONDITIONS	C-2
LAYOUT PLAN	C-3



APPROVED BY OWNER

NAME DATE

SHEET TITLE:

TITLE SHEET

NO.	REVISION/ISSUE	DATE

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SIGNATURE AND SPECIFIC DESCRIPTION OF THE
ALTERATIONS.

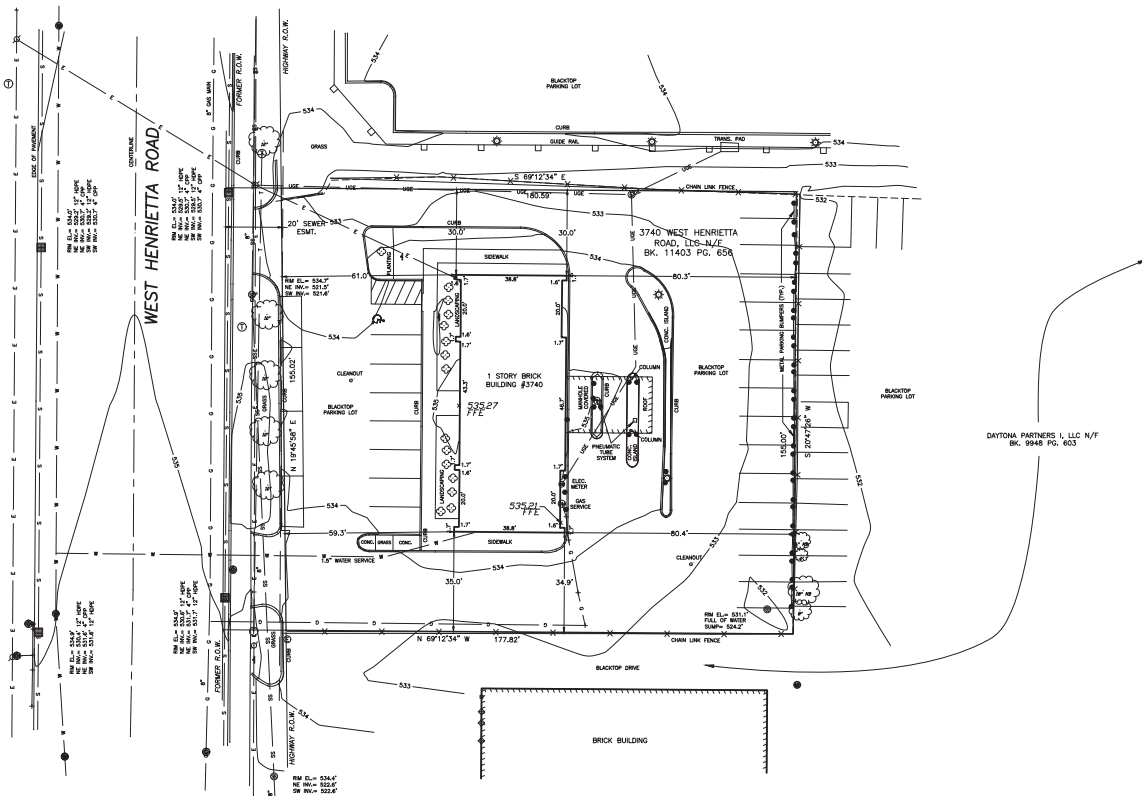
PLAN SEAL BY:
MATTHEW R. NAPIERALA P.E.
NY# REGISTRATION #4620

PROJECT NO. 24-2270	DATE 03 JUN 2024	SHEET
URBAN PULSE - 3740 W. HENRIETTA RD., ROCHESTER, NY 14623		C-1
TOWN OF HENRIETTA MONROE COUNTY, NY		



LEGEND

— U —	UNDERGROUND ELECTRIC
— W —	WATER MAIN
— E —	OVERHEAD UTILITIES
— G —	UNDERGROUND GAS MAIN
— S —	STORM SEWER
— SS —	SANITARY SEWER
□	CATCH BASIN
○	UTILITY POLE
⊕	HYDRANT
●	WATER VALVE
⊙	CONIFEROUS TREE
⊙	DECIDUOUS TREE
⊙	GAS VALVE OR MARKER
X 123.4	SPOT ELEVATION
↑	ROAD SIGN
⊙	SEWER MANHOLE
⊙	STORM MANHOLE
⊙	TRAFFIC SIGNAL BOX
⊙	LIGHT POLE
⊙	TRAFFIC SIGNAL POLE
+	GUY ANCHOR
□	UTILITY BOX
□	AC UNIT



DAYTONA PARTNERS I, LLC N/F
BK. 5048 PLS. 603

I hereby certify that this map was prepared from an actual field topographic survey of the property presented hereon, that all work was performed by me or under my supervision, and that the results of said survey are hereby represented to the best of my belief, professional knowledge and ability.

Forrest L. SeGuin
Forrest L. SeGuin, PLS - N.Y.S. LIC. NO. 050304



UTILITY NOTE

This surveyor has not physically located the underground utilities. Underground utility locations may have been determined from visible evidence, available public maps and/or maps prepared by others and markings established by independent locators or utility companies. There is no guarantee as to the accuracy or completeness of such data, nor is there any guarantee that all utilities are accurately located or depicted on this map. The accuracy of any proposed utility work should be verified prior to commencing excavation, demolition or construction. Call 811 or 1-800-483-7862.



This survey was prepared in accordance with the provisions of the Professional Engineering Law of the State of New York, Chapter 160 of the Laws of 1963, as amended, and the Rules and Regulations of the Board of Professional Engineers, Chapter 170 of the Regulations of the State of New York, as amended. The surveyor is not responsible for any errors or omissions in this survey or for any consequences thereof.

TOPOGRAPHIC SURVEY MAP

LANDS OF 3740 WEST HENRIETTA ROAD, LLC
LOT 7 IN THE FOURTH RANGE OF LOTS - TOWNSHIP 12
TOWN OF HENRIETTA - MONROE COUNTY, NEW YORK

SEGUIN LAND SURVEYING, P.L.L.C.
FORREST L. SEGUIN, L.S.
6197 DYKE ROAD, CHITTENANGO, N.Y. 13037
PHONE: (315)263-1642

DATE: 04/24/2024
PROJECT NO: 24005
JOB MAP NO: 14113-01-12
JOB: HENRIETTA 14113-01-12

SCALE: 1" = 20'



