



**Jubileaf LLC**

4942 South Dakota Ave NE | Washington, DC 20017

## **SECURITY PLAN**

Jubileaf LLC will file with the Department of Health a comprehensive security plan that will provide compliance, operational efficiency and audit control over the Center's security operations.

### **The principal concept of securing three areas:**

Center focuses on the following:

- Provide a safe and secure environment for Jubileaf LLC staff, patients and neighbors
- Safeguard the storage of the product
- Develop comprehensive audit procedures for the entire operation as related to the handling and distribution of the product

### **The attached Security Plan documents the standard security procedure~**

- Jubileaf LLC will enable a safe and orderly workplace.
- Jubileaf LLC will prevent theft or diversion of medical marijuana and assist the Department of Health, the Metropolitan Police Department, and other government agencies in the enforcement of all related laws, rules, and regulations. We will comply with all items in Compliance with emergency And Fourth Proposed Rulemaking §5405.2 and § 5610.

### **Compliance with Emergency And Fourth Proposed Rulemaking § 5405.2**

- Jubileaf LLC will fully comply with the Emergency And Fourth Proposed Rulemaking of the legalization of Marijuana for Medical Treatment Initiative of 1999, §5405.2 and submit a **Site Plan**

showing the entire structure the dispensary is housed in, including the street(s), parking lot(s), other tenants within the facility, and any other entities that physically border the dispensary.

**Floor Plan** of the dispensary detailing the location of the following:

- All entrances and exits to the dispensary;
- The location of any windows, skylights, and roof hatches;
- The location of all cameras, and their field of view;
- The location of all alarm inputs (door contacts, motion detectors, duress/hold up devices) and alarm sirens;
- The location of the digital video recorder and alarm control panel; and restricted and public areas.

**Security Training Plan** provided for, and completed by Jubileaf LLC personnel., including:

- Conflict resolution training and other security training to be provided by staff
- Procedures for handling violent incidents, other emergencies, and calling the Metropolitan Police Department.

In addition to *its* focus on safety, Jubileaf LLC security training will include warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution and diversion detection techniques.

**Procedures Plan for preventing unregistered individuals from purchasing marijuana** Jubileaf LLC shall refuse entry to any person who fails to produce both a valid registration card, issued by the Department of Health, and a valid government issued photo identification document displaying proof of age, that matches the name on the registration card. Entry will be denied to anyone not already registered as a patient by the Department of Health.

Signs will be posted at every entrance and exit, as well as on the dispensing floor, that read: "The sale and use of marijuana and the diversion of marijuana for nonmedical purposes, including to a third party, is a crime in violation of District law." Jubileaf LLC will report all suspicions of divergence to the Department of Health."

If any staff member suspects that a patient or caregiver may intend to resell medicine, the transaction will be halted. The management on duty and the Security Officer must be informed. The Security Officer then will refer the patient to the Department of Health for further action. If it is reported to a staff member that a patient has, in the past, resold medicine, the Security Officer on duty will be informed and the patient will be referred to the Department of Health for further action, as follows.

The Security Officer shall inform the Department in writing and set forth enough information to allow the Department staff to investigate the matter, which shall include at a minimum:

- The facts or circumstances that form the basis of the complaint, including the date(s), time(s), and location(s) of the incident(s);
- Clear identification of the patient or caregiver that is the subject of the complaint;
- The name(s), and contact information (if known) of any witnesses to the incident;
- Any supporting documentation or photos; and the contact information for Jubileaf LLC and the reporting officer.

All such incidents will be recorded in the Incidents Log and management will be responsible for tracking incidents through resolution in a timely manner.

### **Procedures Plan for documenting medical marijuana transactions**

Jubileaf LLC will purchase and participate in a proprietary point-of-sale (POS) computer system that has the capability of the following:

- Verifying that a qualified patient or caregiver is registered by the Department of Health
- Verifying that the qualified patient or caregiver is registered at Jubileaf LLC
- Tracking the quantity and date of each medical marijuana purchase and sale.
- Tracking the quantity and date of each medical marijuana paraphernalia purchase and sale.
- Recording and distinctly indicating the following information:
  - The quantity, form, and price of medical marijuana and paraphernalia purchased from a cultivation center in each purchase;
  - The date and time of delivery of each purchase from a cultivation center;
  - The date and time of each sale to a qualified patient or caregiver;
- The quantity, form, and price of medical marijuana dispensed to the qualified patient or caregiver;
- The consideration given by the qualified patient or caregiver for the medical marijuana;
- The name, address, and card number of the qualified patient or caregiver of the medical marijuana;
- The name and employee identification number of the person who dispensed the medical marijuana; and
- The quantity of medical marijuana still available for sale at the dispensary.

All invoices and delivery slips shall be systematically filed electronically and maintained for a minimum of four (4) years from date of delivery and shall show a true, accurate, legible, and complete statement of terms and conditions on which each purchase was made.

All patient and caregiver information will be securely stored behind professionally monitored firewalls on dedicated servers compliant with HIPAA standards

Jubileaf LLC will never share data without written patient permission. Data will be encrypted to ensure confidentiality and compliance and regularly backed up. Information stored in the database will be password protected and accessible only to those who have a legitimate business need and have been trained in professional conduct, ethics and D.C. and federal laws regarding patient confidentiality.

All access to protected health information will be monitored a minimum of quarterly by the compliance officer. A record will be kept of all logins and files created or edited during that login time.

Any patient health information not in electronic form will be stored in the locked, secure room with access limited to management as determined by the Member Services Manager. In addition to the rules and regulations regarding access and security of patient information, all patients will be provided documentation that informs them of their rights to privacy upon the patient's first visit to

Additional security coverage is addressed in the proposed security plan set forth herein.

#### **Plan for the use and maintenance of an Incident Log**

Jubileaf LLC will maintain an Incident Log to document and track critical incidents. Documentation in the Incident Log will occur immediately following any breach of security or protocol.

Management and security will thoroughly examine the event, how it could have been avoided, and how to prevent its reoccurrence.

#### **Specifically, questions to be answered must include:**

- A full description of what occurred and who was involved,
- How it affected the patient(s), employee(s), bystander(s), and the Center,
- How it could have been avoided, stopped from reoccurring, and
- The further action that needs to be taken.

If appropriate, a Root Cause Analysis will be conducted by management. Depending on the severity of the incident, a senior staff member will make a full report of the incident, including all follow-up work that remains to be done, to the DOH, MPD, or other authorities.

Management will review the Incident Log quarterly, to evaluate any possible trends and concerns, and to identify possible improvements.

## **Procedures Plan for preventing the use of medical marijuana on the premises**

Jubileaf LLC will not permit the ingestion of medical marijuana in any form on its premises. To prevent such ingestion, signs will be posted at every entrance and exit as well as on the walls of the dispensing floor, that read:

"Smoking, ingesting or consuming marijuana on the premises or in the vicinity of the dispensary is prohibited. Marijuana shall be used only by the qualifying patient in his or her home, the facility where he or she resides, or a medical facility when receiving medical care for a qualifying medical condition, if permitted by the medical facility."

If a patient or caregiver ingests medicine on the premises of Jubileaf LLC, or in the vicinity, the witnessing staff member shall inform the Security Officer on duty, who will refer the patient to the Department of Health for further action. The Security Officer shall inform the Department in writing and set forth enough information to allow the Department staff to investigate the matter, which shall include at a minimum:

- The facts or circumstances that form the basis of the complaint, including the date(s), time(s), and location(s) of the incident(s);
- Clear identification of the patient or caregiver that is the subject of the complaint;
- The name(s), and contact information (if known) of any witnesses to the incident;
- Any supporting documentation or photos; and the contact information for Jubileaf LLC and the reporting officer.

Jubileaf LLC shall dispense medical marijuana in a closed container that shall not be opened after sale, or the contents consumed, on the premises where sold.

We may exhibit for display purposes only, clear jars of medical marijuana to assist qualified patients in making informed decisions. Jubileaf LLC will not permit, on the registered premises, any medical marijuana or marijuana paraphernalia that shows evidence of the medical marijuana having been consumed or partially consumed. All such incidents will be recorded in the Incident Log for tracking through resolution.

## **The number and location of cameras**

Jubileaf LLC will visually record and monitor all building entrances and exits, all parking lot areas, the rear area of the building immediately adjacent to the railroad tracks, and will visually record the entire inside of the facility, including all limited access areas, and including all areas where medical marijuana is stored, dispensed. Ten fixed dome cameras shall be installed to provide a consistent recorded image of these areas. The surveillance cameras will maximize the quality of facial and body images and avoid backlighting and physical obstructions.

Cameras installed outdoors and in low-light interior areas shall be day/night cameras with a minimum resolution of six hundred (600) lines per inch (analog) or 01 (IP) and a minimum light factor requirement of seven-tenths (0.7) LUX. Additional lighting will be installed to increase picture clarity.

and brightness, if required. Cameras shall be calibrated and focused to maximize the quality of the recorded image.

Security measures taken to prevent individuals from entering the limited access area **portion of the registered premises**

All areas of Jubileaf LLC are restricted access areas. The dispensary will be closed to the general public at all times. Access to the public will always be prohibited. Anyone not registered as D.C. DOH medical marijuana patient or caregiver will be turned away at the front door.

**Access to the dispensary has been divided into three restricted levels.**

- **Level One: The Entry Vestibule** - DOH registered patients, caregivers, and employees will gain entry to the vestibule by electronically unlocking the door using their DOH issued cards at the entrance card reader. The individual then enters the vestibule, which serves as a mantrap preventing the person from entering further into the dispensary until an additional security clearance.
- **Level Two: Reception.**, Waiting Area, Rest Room, Consultation Room, Security Area, and the Dispensing Area - At the second entry door, a employee will personally inspect the DOH issued card and photo ID and then welcome the patient or employee into the dispensary. The patient registers and awaits the scheduled appointment.
- **Level Three:** Safe Room and Processing (Lab) Room-These areas are accessible only Jubileaf LLC managerial and security staff, who gain entry through a biometric process. When the dispensary is closed, these rooms are secured with volumetric intrusion detection devices installed and connected to the facility intrusion detection system.

For location of restricted access areas, see **Restricted Access Area Plan**

**Closing procedures after the cessation of business each day**

At the end of each day, after the dispensary is closed to patients, the following closing procedures must be performed each day:

- Submit all unsold medicine and daily receipts to be counted and recorded.
- Reconcile all medicine entered into the system, ensuring all medicine sold is accounted for by daily receipts. Any and all discrepancies must be accounted for and noted in the Incident Log, with appropriate follow-up as described.
- Secure all unsold medicine and daily receipts in the vault in the safe room.
- Turn off all counting machines and lights. Lock down the vault and set vault alarm.
- Stock, organize, and put away supplies as needed.

- Sanitize utensils, trays, baskets, and scale and put away.
- Sanitize all workstation surfaces.
- Close all programs and turn off all computers.
- Turn Off Workstation Lights.

After the departure of the last patient, and all the above closing procedures have been completed, the Security Officer does the final end-of-day internal sweep of the building, walking through the entire building to ensure no one is left in the building, closing, and securing all doors and windows, and turning off all unnecessary lights. All cameras; and alarms are checked and engaged, the doors are locked (and double-checked) and the Security Officer ensures all employees have safely left the premises.

## **Plan to prevent theft or the diversion of medical marijuana**

### **Restricted Access**

All areas of the restricted access areas. The dispensary will be closed to the general public at all times. Access to the public will never be allowed. The general public will be turned away at the front door.

### **Security**

Secured by a state-of-the-art system approved by the Metropolitan Police Department, with an armed, off-duty police officer on the premises during all operating hours, will provide easily accessible and secure parking in a peaceful setting conducive to healing. Our security system and off-duty police officer will serve as a deterrent to criminal activity.

All areas will be covered by a combination of Passive Infrared (PIR) motion sensors and acoustic noise sensors. For further protection when power is off, all Interior and exterior door Balanced Magnetic Switch (BMS) sensors will control locks. Separate power backup

Incident Log for management review, drill down, evaluation and any recommendations for improvement.

### **Alarm System**

Jubileaf LLC will install, maintain, and use a professionally monitored robbery and burglary alarm system; which meet the following requirements:

- The control panel shall be a UL listed burglar alarm control panel;
- The system shall report to a UL listed central monitoring station;
- A test signal shall be transmitted to the central station every twenty-four (24) hours;

- At a minimum, the system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls or walls shared with other facility tenants, roof hatches, skylights, and storage room(s) that contain safe(s);
- The system shall include at least two (2) holdup alarms for staff use; and
- The system shall be inspected and all devices tested annually by a qualified alarm vendor.

Jubileaf LLC will maintain for a period of more than three (3) years all reports of incidents that triggered an alarm. Such reports shall be made available to the Department of Health during an inspection of the facility or any other time.

### **Exterior Lighting**

For security purposes, sufficient lighting will be added so that, outside of the registered business hours each day after sunset and before sunrise, the dispensary is adequately illuminated. The lighting plan calls for the adequate illumination of the immediate surrounding area, including storage areas, parking lots, entry areas such as the front facade, and the adjoining public sidewalk.

Exterior lighting shall be hooded or oriented to deflect light away from adjacent properties, although, for security purposes, lighting will be directed toward the Triangle Park across the street, should the neighborhood request.

### **Procedures for Accepting Delivery**

Medical marijuana will be acquired from DOH registered District of Columbia cultivation centers only. Medical marijuana, that has been processed weighed and laboratory tested at the cultivation center will be delivered to Jubileaf LLC by appointment only, by the registered cultivation center.

### **Medicine shall be received at Jubileaf LLC**

- at a time pre-arranged with the delivering cultivation center,
- inside the locked, safe room,
- before or after regular hours,
- when no patients or caregivers are present,
- with a Security Officer dedicated to the safety of the transfer.

Upon receipt, each sealed package of medicine will be weighed and tagged with a unique tracking code that will identify the medicine as it is processed and dispensed. Two staff members, at least one of them a manager, will accept delivery of all medicine and medical marijuana products and place them in safe storage.



## **Storage of Medicine**

Jubileaf LLC shall keep all medical marijuana located on the premises in a separate storage area, which will be securely closed and locked during all hours when the establishment is prohibited from operating or is closed. The storage and processing areas shall have volumetric intrusion detection devices installed and connected to the facility intrusion detection system.

Within the separate storage area shall be installed a vault for overnight storage of any processed marijuana, transaction records, and cash on the registered premises. The vault shall be more than a seven hundred fifty pounds (750 lb.) UL listed burglarproof safe with a minimum rating of greater than TL-30.

## **Processing of Medicine**

Jubileaf LLC will prepare, package and label all medicine to dispense in a separate processing room that will be securely closed and locked during all hours when the establishment is prohibited from operating or is closed. The processing room shall have a volumetric intrusion detection device installed and connected to the facility intrusion detection system.

Daily, management will select bulk units of each of those medicines and products to be made available that day and removes them from the vault. Each bulk unit is taken to the processing room and, in a safe and secure environment, divided into individually packaged units for sale.

## **Packaging**

Dried medical marijuana flowers will be distributed in child-resistant plastic containers similar to those used by pharmacies to dispense pharmaceutical drugs. Baked goods and other medical marijuana products will be packaged in appropriate, plain child-resistant plastic packaging and tightly sealed. All medical marijuana products shall be packaged in sealed containers that cannot be opened without obvious damage to the packaging.

## **Recording of Transaction**

Each transaction for the acceptance of medical marijuana will be recorded for tracking through the POS system from acquisition registered cultivation center until receipt by the patient, to include:

- The quantity and date of each medical marijuana purchase.
- The quantity and date of each medical marijuana paraphernalia purchase.
- The quantity, form, and price of medical marijuana and paraphernalia purchased from a cultivation center in each purchase;
- The date and time of delivery of each purchase from a cultivation center.

## **Compliance with Emergency And Fourth Proposed Rulemaking § 5610**

Jubileaf LLC will fully comply with the Emergency And Fourth Proposed Rulemaking of the Legalization of Marijuana for Medical Treatment Initiative of 1999, §5610 and shall operate and maintain in good working order a twenty-four (24) hour, seven (7) days a week, a closed circuit television (CCTV) surveillance system on the premises that complies with the following minimum standards

- Visually records and monitors all building entrances and exits, all parking lot areas, rear alley areas immediately adjacent to the building, and covers the entire inside of the facility, including all limited access areas, and including all areas where medical marijuana is stored, dispensed, or destroyed. Fixed cameras shall be installed to provide a consistent recorded image of these areas. The surveillance cameras will maximize the quality of facial and body images and avoid backlighting and physical obstructions;
- Cameras installed outdoors and in low-light interior areas shall be day/night. Cameras with a minimum resolution of six hundred (600) lines per inch (analog) or D1 (IP) and a minimum light factor requirement of seven-tenths (0.7) LUX. Additional lighting will be installed to increase picture clarity and brightness, if required. Cameras shall be calibrated and focused to maximize the quality of the recorded image;
- The recording device shall be a digital video recorder that meets the following minimum standards:
  - o Displays a date and time stamp on all recorded video; and can produce a videodisc (CD/DVD) directly from the DVR unit using an installed media recording drive. The video on the disc shall be viewable on any Windows PC, and include any required player software on the disc.
- A display monitor with a minimum screen size of twelve inches (12in.) inches shall be connected to the electronic recording security system at all times;
- The electronic recording security system will be maintained in good working order at all times. Each manager, employee, or agent overseeing the functioning of the video recording security system will be required immediately to report any malfunctioning or technical problems with the system;
- Security recordings shall meet the following minimum requirements:
  - o The recorded image resolution shall be at least D1; and
  - o The recorded image frame rate shall be at least three (3) frames per second during alarm or motion-based recording.
- Security recordings shall be retained by or a more than thirty days. The recording system for the security cameras will be located in a locked, tamper-proof compartment. If not tape over existing security video from the previous thirty (30) days; and

Upon request Jubileaf LLC shall relinquish all recordings to the Metropolitan Department of Health.

Jubileaf LLC shall install, maintain, and use a professionally monitored robbery and burglary alarm system; which meet the following requirements:

- The control panel shall be a UL listed burglar alarm control panel;
- The system shall report to a UL listed central monitoring station;

- A test signal shall be transmitted to the central station every twenty-four (24) hours;
- The system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls or walls shared with other facility tenants, roof hatches, skylights, and storage room that contain the safe;
- The system shall include at least two (2) holdup alarms for staff use; and
- The system shall be inspected and all devices tested annually by a qualified alarm vendor.

Jubileaf LLC shall maintain for a period of *more than* three (3) years all reports of incidents that triggered an alarm. Such reports shall be made available to the Department of Health during any inspection of the facility shall *notify* the Department of Health by electronic means within twenty-four (24 hours) of any incident in which a theft, burglary, robbery, or break in occurred, whether or not items were actually removed from the facility. The facility manager shall follow up the initial notice with a written report describing in detail the factual circumstances surrounding the incident and include an inventory of all stolen items, if applicable.