

**CITY OF SANTEE**  
**COMMERCIAL CANNABIS**  
**STORE-FRONT RETAIL**  
**APPLICATION WITH DELIVERY**  
**OCTOBER 2024**

**CU  
LT  
UR  
E**

DEVON JULIAN

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People use the cannabis plant for many different reasons, including health and wellness. Cannabis can be used to boost creativity and energy and to improve focus. Cannabis is a natural, affordable way to help your body relax and maintain a sense of balance. It can also help with eating, sleeping, and natural healing. Cannabis enhances your everyday routines, and it can make fun activities even better. People who use cannabis tend to be less stressed, and they also use less alcohol, tobacco, and narcotics.



# COMMERCIAL CANNABIS BUSINESS PERMIT APPLICATION (Retail Applications)

City of Santee  
10601 Magnolia Ave  
Santee, CA 92071  
Email:  
cannabisinfo@cityofsantee.ca.gov

## APPLICANT (ENTITY) INFORMATION

Applicant (Entity) Name: \_\_\_\_\_ DBA: \_\_\_\_\_

Physical Address: \_\_\_\_\_  
Street City State Zip

Primary Contact: \_\_\_\_\_ Title: \_\_\_\_\_

Mailing Address: \_\_\_\_\_  
Street City State Zip

Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

HAS ANY INDIVIDUAL IN THIS APPLICATION APPLIED FOR ANY OTHER CANNABIS PERMIT IN THE CITY OF SANTEE? ☐ Yes ☐ No

Indicate whether you intend to operate a Microbusiness with Retail. ☐ Yes ☐ No

Business Formation: Describe how the business is organized.

☐ Sole Partnership ☐ Corporation ☐ S-Corporation ☐ Limited Partnership ☐ Limited Liability Company  
☐ Other (please describe): \_\_\_\_\_

## PROPOSED LOCATION

Property Owner Name: \_\_\_\_\_

Proposed Location  
Address: \_\_\_\_\_  
Street City State Zip

Property Owner Phone  
Number: \_\_\_\_\_ Email: \_\_\_\_\_

Zoning Clearance Letter : ☐ Yes ☐ No

Assessor's Parcel Number (APN): \_\_\_\_\_

## APPLICATION SUBMITTAL CHECKLIST

Applications must be submitted online via the City of Santee's Permitting and Licensing Portal. Applicants failing to submit any of the following will be deemed incomplete and will not move forward in the application process:

- ✓ A complete and signed Commercial Cannabis Business Permit Application form and Evaluation Criteria. The evaluation criteria response is limited to 125 pages.
- ✓ A signed Financial Responsibility, Indemnity and Consent to Inspection Agreement form.
- ✓ A signed Agreement to Limitations of City Liability and Indemnification to City form.
- ✓ Verification of Live Scan background submittal
- ✓ A signed and notarized Property Owner Consent/Landlord Affidavit.
- ✓ Proof of Insurance or Letter of Insurability from the Insurance Company
- ✓ Proof of Capitalization
- ✓ Zoning Verification Letter.
- ✓ Application Fee. (Note that this fee should be submitted in person to the City).




## OWNER INFORMATION

For the purpose of this section, "owner" shall have the same meaning as the word "owner" set forth Santee Municipal Code Section 7.04.060, which includes any of the following:

1. A person with an aggregate ownership interest of 10 percent or more in the commercial cannabis business, unless the interest is solely a security, lien, or encumbrance;
2. An individual who manages, directs, or controls the operations of the commercial cannabis business, including but not limited to: A) member of the board of directors of a nonprofit; B) A general partner of a commercial cannabis business that is organized as a partnership; C) A non-member manager or manager of a commercial cannabis business that is organized as a limited liability company; D) The trustee(s) and all persons who have control of the trust and / or the commercial cannabis business that is held in trust; E) An individual with the authority to provide strategic direction and oversight for the overall operations of the commercial cannabis business, such as the chief executive officer, president or their equivalent, or an officer, director, vice president, general manager or their equivalent; F) An individual with the authority to execute contracts on behalf of the commercial cannabis business.

Ownership percentages should total 100%. If any individual(s) own(s) less than 10%, list the number of individuals who own less than 10% and the total percentage to reach 100%. For example, If John Doe owns 5%, Joe Smith owns 8%, and Mary Jones owns 9% state at the bottom of this form that three individuals own 22% so that the total will equal 100% once you individually include all those who own 10% or more.

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.				
Ownership %	20%	Background information is included as required?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Owner Name:	DBJ La Mesa Corp (Devon Julian)	Title:	CEO	
Address:	1 Corporate Park, Suite 112	Irvine	CA	92606
	Street	City	State	Zip
Signature:			Date:	9/11/2024

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.				
Ownership %	80%	Background information is included as required?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Owner Name:	JL Sky Legacy Inc. (Julie Le)	Title:	Director of Administration	
Address:	1 Corporate Park, Suite 112	Irvine	CA	92606
	Street	City	State	Zip
Signature:			Date:	

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.				
Ownership %		Background information is included as required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Owner Name:		Title:		
Address:				
	Street	City	State	Zip
Signature:			Date:	

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.				
Ownership %		Background information is included as required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Owner Name:		Title:		
Address:				
	Street	City	State	Zip
Signature:			Date:	

Add more pages as necessary to accommodate all Commercial Cannabis Business Owners



## OWNER INFORMATION

For the purpose of this section, "owner" shall have the same meaning as the word "owner" set forth Santee Municipal Code Section 7.04.060, which includes any of the following:

1. A person with an aggregate ownership interest of 10 percent or more in the commercial cannabis business, unless the interest is solely a security, lien, or encumbrance;
2. An individual who manages, directs, or controls the operations of the commercial cannabis business, including but not limited to: A) member of the board of directors of a nonprofit; B) A general partner of a commercial cannabis business that is organized as a partnership; C) A non-member manager or manager of a commercial cannabis business that is organized as a limited liability company; D) The trustee(s) and all persons who have control of the trust and / or the commercial cannabis business that is held in trust; E) An individual with the authority to provide strategic direction and oversight for the overall operations of the commercial cannabis business, such as the chief executive officer, president or their equivalent, or an officer, director, vice president, general manager or their equivalent; F) An individual with the authority to execute contracts on behalf of the commercial cannabis business.

Ownership percentages should total 100%. If any individual(s) own(s) less than 10%, list the number of individuals who own less than 10% and the total percentage to reach 100%. For example, If John Doe owns 5%, Joe Smith owns 8%, and Mary Jones owns 9% state at the bottom of this form that three individuals own 22% so that the total will equal 100% once you individually include all those who own 10% or more.

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.

Background information is  
included as required?

☒ Yes ☐ No

Ownership %

Owner Name: DBJ La Mesa Corp (Devon Julian)

Title: CEO

Address: 1 Corporate Park, Suite 112 Irvine CA 92606  
Street City State Zip

Signature: Date: 9/11/2024

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.

Background information is  
included as required?

☒ Yes ☐ No

Ownership %

Owner Name: JL Sky Legacy Inc. (Julie Le)

Title: Director of Administration

Address: 1 Corporate Park, Suite 112 Irvine CA 92606  
Street City State Zip

Signature:  Date:

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.

Background Information is  
included as required?

☐ Yes ☐ No

Ownership %

Owner Name:

Title:

Address: Street City State Zip

Signature: Date:

I declare under the penalty of perjury that the information provided on this disclosure form is true and accurate to the best of my knowledge.

Background information is  
included as required?

☐ Yes ☐ No

Ownership %

Owner Name:

Title:

Address: Street City State Zip

Signature: Date:

Add more pages as necessary to accommodate all Commercial Cannabis Business Owners



## SUPPORTING INFORMATION

List all fictitious business names the applicant is operating under including the address where each business is located:

Culture Cannabis Club, 8781 Cuyamaca St, Suites A, B, C & D, Santee CA 92071

Has the Applicant or any of its owners been the subject of any administrative action, including but not limited to suspension, denial, or revocation of a cannabis business license at any time in the previous five (5) years? If so, please list and explain:

No

Is the Applicant or any of its owners currently involved in an application process in any other jurisdiction(s)? If so, which jurisdiction(s)?

Yes, in the city of Covina, New Jersey, Kentucky & Florida

## APPLICATION CERTIFICATION

I hereby certify, under penalty of perjury, on behalf of myself and all owners, corporate officers, partners, and managers identified in this application that the statements and information furnished in this application and the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. I understand that a misrepresentation of fact is cause for rejection of this application, denial of the permit, or revocation of a permit issued.

In addition, I understand that the filing of this application grants the City of Santee permission to reproduce submitted materials for distribution to staff, Commissions, Boards and City Council Members, and other Agencies to process the application. Nothing in this consent, however, shall entitle any person to make use of the intellectual property in plans, exhibits, and photographs for any purpose unrelated to the City's consideration of this application.

Furthermore, by submitting this application, I understand and agree that any business resulting from an approval shall be maintained and operated in accordance with requirements of the City of Santee Municipal Code and State law.

Under penalty of perjury, I hereby declare that the information contained in within and submitted with the application is true, complete, and accurate. I understand that a misrepresentation of the facts is cause for rejection of this application, denial of a license or revocation of an issued license. I further authorize the City, its agents, and employees to seek verification of the information contained in the application.

Devon Julian

Name

CEO

Title

Signature

09/11/2024

Date

For information required as part of the application process, see the Application Procedures and Review Criteria, City of Santee Municipal Code Chapter 7.04. All documents can be found online at <https://www.cityofsanteeca.gov/business/cannabis-business>. For questions, please email: [cannabisinfo@cityofsanteeca.gov](mailto:cannabisinfo@cityofsanteeca.gov).

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## SECTION A : BUSINESS PLAN

### SUMMARY

The Applicant, Santee Store LLC, doing business as "Culture Cannabis Club," hereafter referred to as "Culture," seeks a Medical & Adult Use Retail License with Delivery Service to end consumers. This single-purpose limited liability company holds no other licenses or assets and will exclusively operate in the City of Santee if awarded the license. All other references to the Culture business pertain to separate corporations licensed in their respective cities, operating under the federally and California State registered trademark Culture Cannabis Club.

Santee Store LLC has no parent or affiliate companies. Established in September 2023, it was created solely to pursue a cannabis business permit and enter a lease for the proposed facility in the City of Santee. The Applicant has no filings, claims, bankruptcies, judgments, or liens. Additionally, as there are no parent or affiliate entities, Santee Store LLC has not faced any code enforcement actions, nor has it filed or received any claims against local agencies.

Culture proposes to operate its retail facility at 8781 Cuyamaca Street, Suites A-D (the "Facility"), which complies with all zoning and sensitive-use setback requirements per City of Santee Chapter 7.04 Cannabis Business Permit Ordinance, § 7.04.340 General Operating Requirements, § 7.04.360 Operating Requirements for Retail Store Front Facilities, et al. The Facility was intentionally chosen for its distance from sensitive-use locations, such as schools and youth centers. The Facility is situated in a multi-tenant commercial building near the well-trafficked intersection of Buena Vista Avenue and Cuyamaca Street, offering ample parking, strong freeway visibility and traffic flow to and from the 52 Freeway. Additionally, the daily pedestrian draw of the new 65,000 square foot Medical Center across the street is an advantage for steady traffic flow. We will make both interior and exterior improvements to meet Culture's design



standards. Culture commits up to 7% of gross receipts and 1% of gross profits to support a robust Community Benefits program, and projects first-year revenue of over \$8 million, growing to over \$12 million by Year 5.

## OUR PROPOSAL TO THE CITY OF SANTEE

The owners of the Applicant bring a wealth of experience in the cannabis industry, collectively amassing over 20 years in legal operations. They have generated more than \$100 million in revenue throughout their careers. Currently, Culture operates 10 cannabis retail stores, including 8 in California, 1 in Mississippi, and 1 in Ohio. Since opening its first branded store in Long Beach in August 2020, Culture has successfully launched a dozen retail locations in just four years. Looking ahead, Culture plans to open an additional 2 stores in 2024, expanding into Northern California.

The Culture ownership team goes beyond equity stakeholders; all our corporate and operations employees are committed to treating Culture as their own. This dedication motivates over 300 individuals and highlights the positive impact we have on our team. We invite the City of Santee to join us in delivering a unique community experience, creating job opportunities, and fostering shared growth and prosperity for Santee residents.







## 1. FINANCES

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To provide a realistic overview of our five-year profit projections, Culture has thoroughly analyzed population growth trends, market dynamics, labor force statistics, and various other factors to inform our budgeting process. Our unique technological capabilities will attract and engage the tech-savvy population of Santee. Additionally, our retail delivery service will expand our customer reach, bringing revenue from neighboring cities to support local wages, taxes, and fees.

Santee and San Diego County are experiencing rapid growth, becoming a hub for a diverse array of residents working in sectors such as agriculture, healthcare, manufacturing, retail, and niche industries like event production and tourism. Culture is poised to achieve its goals in Santee and emerge as a key player in the local market, bolstered by strong brand recognition, competitive pricing, bulk purchasing power, an extensive delivery network, and deep community integration.

To calculate our annual gross receipts (less taxes), we used the following figures:

- City population for Santee, surrounding areas, and commuting traffic: 60,000
- Average monthly customers over 21, representing 15% of the population
- Potential city customers: 9,000
- Number of approved retail locations: 4
- Estimated daily customers: 350-450
- Estimated hourly customers: 10-35
- Estimated minutes per transaction: 6

### **Additional Contributing Factors**

- The average age of the local population aligns with the typical cannabis consumer age of 37.
- Culture anticipates serving an average of 350-450 customers daily, with peak volumes during mid-morning and evenings on weekdays, higher traffic on national holidays, and increased patronage during mid-day on weekends. This estimate includes delivery orders.
- Designed to be inviting and accessible to all legal age groups, Culture will also implement programs targeting consumers aged 55 and older, the fastest-growing cannabis demographic in the state. We will offer holistic services, education on the potential benefits of CBD, yoga coupons, and community events to position our location as a destination for an active aging population.
- Our retail model features unique touch-screen technology, lift-and-learn automated flower bars, and smart product packaging, making Culture a destination for tech-savvy residents. This technology streamlines the checkout process.
- Culture has established strategic partnerships with licensed cultivation, distribution, and manufacturing facilities statewide, reducing our costs of goods sold by procuring sought-after brands at competitive prices.
- Our facility employs low-flow water fixtures, LED smart lighting, and energy-efficient practices, significantly reducing utility usage.

- We utilize hybrid vehicles and efficiency-based route selection for our delivery operations, focusing on fuel efficiency for both environmental and cost reasons. Fuel costs are incorporated into the supplies portion of the budget.
- Build-out is expected to proceed swiftly, featuring tasteful aesthetic improvements, low overall construction costs, and the expertise of our experienced construction contractor.

Beyond the factors already listed, several additional contributing elements can play a pivotal role in Culture's stellar gross revenue. These include a comprehensive approach to strategic growth and customer engagement, such as targeted marketing initiatives like loyalty programs, promotions, and discounts, paired with a robust social media presence and influencer collaborations to enhance brand visibility. Educational programs and workshops on cannabis benefits and consumption methods will position us as a trusted information source. Establishing community partnerships and exclusive product offerings will create a sense of exclusivity, attracting a dedicated customer base. Interactive in-store experiences, subscription services, and a user-friendly e-commerce platform will further enhance customer engagement and diversify revenue streams. Innovative packaging solutions, participation in cannabis events, sponsorships, a diverse product mix, well-trained staff, and the use of data analytics for customer insights will collectively strengthen Culture's retail environment. By integrating these additional factors, Culture can solidify its position as a destination store, fostering sustained growth in gross revenue.

Our five-year pro forma, supported by market and city assumptions, offers valuable insights into our anticipated build-out, start-up, and operational phases. We adopt a conservative approach, confident that we can exceed our projections once our delivery service is fully operational. By providing exceptional customer service and implementing an aggressive marketing campaign, we aim to establish Culture as a local favorite.

Culture's pro forma budget outlines a comprehensive five-year financial forecast for our Santee location, focusing on income, taxes, cost of goods sold (COGS), and expenses. We project steady growth in retail sales, reaching \$12,446,910 by Year 5.



## DEMONSTRATION OF SUFFICIENT CAPITAL FOR STARTUP COSTS AND 3 MONTHS OPERATING COSTS

### CONSTRUCTION BUDGET (CAPEX)

Our capital expenditure (CAPEX), start-up costs plus holding costs, will be approximately **\$476,234**. This includes costs for all aspects of the proposed structure build-out and initial expenses. Our construction budget figures have been calculated using previous tenant improvement budgets, the anticipated structural and aesthetic requirements of our location, and consultations with local architects, engineers, and building contractors. The construction budget considers all necessary improvements required to build a safe, eco-friendly, legally compliant cannabis space to house Culture products for in-store sales and Culture delivery service.



### OPERATING BUDGET (OPEX)

Our 5-Month Operating Expenditures, (OPEX) total **\$818,930**. These figures consider the intangibles needed to maintain and operate the Culture store for the first **5 months**.

We anticipate tenant improvements + first 5 months of operational expenses to total approximately **\$1,295,163**.

With over \$2.5 million in credit extended to the Santee business for build-out and startup, Culture is confident in its financial stability. Culture Stanton Store Inc. will provide Santee Store LLC with a loan of up to \$1,000,000 to cover build-out and startup costs. This financial support comes from the earnings generated by Culture Stanton Store, owned and operated by Devon Julian and Julie Le, allowing them to reinvest in the expansion of their brand.

In addition, Santee Store LLC has secured a private line of credit from accredited investor Thomas Anderson for up to \$1,600,000.

### 5 MONTHS OPERATING EXPENSES

OPEX	\$ 818,930
CAPEX	\$ 476,234
<b>TOTAL EXPENSES</b>	<b>\$ 1,295,163</b>

## City of Santee – Commercial Cannabis Retail Application

COMMERCIAL CANNABIS TENANT IMPROVEMENTS				
TYPE: RETAIL				
Santee, CA				
DESCRIPTION	QTY	LABOR & MATERIAL COST	SUBTOTAL COST	NOTES
ARCHITECT	1	\$30,000.00	\$30,000.00	TI - CUP and Cannabis permit Application exhibits w/ Full CDs
DESIGN	1	\$15,000.00	\$15,000.00	
PLUMBING (ROUGH & FINISH)	1	\$7,500.00	\$7,500.00	Plumbing remains - upgrade fixtures and finishes
FLOORING	1281	\$3.00	\$3,843.00	Polish concrete
TILE WORK	650	\$3.00	\$1,950.00	Per Design Plan
DOORS/FRAMES/HDWR	6	\$3,500.00	\$21,000.00	Glass store front entrance and interior doors
GLAZING	1	\$12,000.00	\$12,000.00	Storefront and lobby wall
FRAMING DRYWALL	1	\$10,000.00	\$10,000.00	
PAINTING	1281	\$2.00	\$2,562.00	New paint, trim, base and ceiling [if needed]
SECURITY MEASURES	1	\$25,000.00	\$25,000.00	Alarm System, Panic Buttons, Cameras, DVR, RFID Door Locks, Safe
FIRE/LIFE/SAFETY	1	\$2,450.00	\$2,450.00	
CASEWORK/ MILLWORK	1	\$90,000.00	\$90,000.00	
BATHROOM FIXTURES MATERIALS	1	\$2,200.00	\$2,200.00	
LIGHTING	1	\$4,600.00	\$4,600.00	
SIGNAGE	1	\$14,000.00	\$14,000.00	
HVAC	1	\$8,000.00	\$8,000.00	
ELECTRICAL	1	\$10,500.00	\$10,500.00	
BRANDING & DESIGN	1	\$12,000.00	\$12,000.00	
POS/COMPUTERS/SOFTWARE	6	\$15,000.00	\$90,000.00	
<b>SUBTOTALS CONSTRUCTION WORK</b>			<b><u>\$362,605.00</u></b>	
GENERAL CONDITIONS/SUPERVISION		5%	\$18,130.25	
CONTRACTOR'S FEE		15%	\$54,390.75	
<b>TOTAL CONSTRUCTION COST</b>			<b><u>\$435,126.00</u></b>	
GENERAL LIABILITY INSURANCE			\$4,351.26	
BUILDING PERMITS			\$15,000.00	
CONTINGENCY			\$21,756.30	
<b>TOTAL COST OF PROJECT</b>			<b><u>\$476,233.56</u></b>	
PROJECT COST PER SQ FT			\$371.77	

### DESCRIPTION OF SOURCES AND USES OF FUNDS

The allocated private funds lent by Culture Stanton Store and Thomas Anderson will primarily support construction activities for interior tenant improvements and facility upgrades, which include enhancements such as exterior painting, perimeter fencing, and landscaping. We anticipate that these improvements will take approximately 3-4 months to complete. To ensure timely progress, a portion of the funds will be reserved for pre-ordering necessary supplies and materials, mitigating potential delays related to city permit approvals or supply backorders. Additionally, we will utilize funds to conduct a competitive bidding process, engaging at least three contractors whose qualifications and experience align with our project needs. This approach will help us select contractors who demonstrate a track record of high-quality work, familiarity with cannabis industry regulations, and a commitment to local labor practices.

Furthermore, a portion of the funds will be allocated to cover initial operating expenses and start-up costs, ensuring that the business maintains positive cash flow during its early stages. This investment will help us navigate the period before achieving profitability, allowing us to establish our brand and customer base effectively.

Operating Budget (OPEX)		5 Months	Income Statement	
Lease	\$	65,250	REVENUE	\$ 8,259,616
Utilities & Maintenance	\$	11,250	COGS	\$ 2,415,975
Security Services	\$	90,000		
Vehicle Lease	\$	1,000	GROSS PROFIT	\$ 6,039,938
Insurance - Workers Comp & Auto	\$	10,950		
Insurance - General Liability	\$	13,750	OPEX	\$ 818,930
Advertising & Marketing	\$	27,500	LEASE	\$ 65,250
POS Software	\$	12,250	GENERAL - ADMIN	\$ 172,950
Equipment	\$	3,750	PAYROLL	\$ 414,398
Banking	\$	2,500	OTHER EXPENSES	\$ 166,333
Payroll	\$	414,398		
Initial Inventory Purchase	\$	41,666	OPERATING PROFIT (EBIT)	\$ 3,646,457
Licensing & Entitlement Fees	\$	54,167		
Professional Services	\$	70,500	TAX	\$ 2,219,677
<b>Total</b>		<b>\$ 818,930</b>	<b>NET PROFIT</b>	<b>\$ 1,426,779</b>

#### A. PROOF OF CAPITALIZATION

Culture Stanton Store Inc., will loan Santee Store LLC, up to \$1,000,000 for its build-out and start-up costs. Culture Stanton Store is owned and operated by Devon Julian and Julie Le, and they will be able to reinvest their company earnings to expand the business brand.

Additionally, Santee Store LLC has procured a private line of credit from an accredited investor, Thomas Anderson, for an amount up to \$1,600,000. The proof of funds for both of these entities, as well as the letters of credit, can be found in application *Document # 7 Proof of Capitalization*.

**B. PRO FORMA FOR 5 YEARS OF OPERATIONS**

<b>PRO FORMA - 5 YEAR BUDGET</b>	<b>YEAR 1</b>	<b>YEAR 2</b>	<b>YEAR 3</b>	<b>YEAR 4</b>	<b>YEAR 5</b>
<b>INCOME</b>					
<b>Retail Sales</b>					
Retail Sales - Cartridge	\$ 1,921,187	\$ 2,305,424	\$ 2,651,237	\$ 2,783,799	\$ 2,895,151
Retail Sales - Beverage	\$ 52,862	\$ 63,434	\$ 72,949	\$ 76,596	\$ 79,660
Retail Sales - Edible	\$ 555,046	\$ 666,055	\$ 765,964	\$ 804,262	\$ 836,432
Retail Sales - Extract	\$ 645,902	\$ 775,082	\$ 891,345	\$ 935,912	\$ 973,348
Retail Sales - Flower	\$ 3,569,806	\$ 4,283,767	\$ 4,926,332	\$ 5,172,649	\$ 5,379,555
Retail Sales - Merchandise	\$ 153,629	\$ 184,355	\$ 212,008	\$ 222,608	\$ 231,513
Retail Sales - Pill	\$ 75,163	\$ 90,195	\$ 103,724	\$ 108,910	\$ 113,267
Retail Sales - Pre Roll	\$ 1,004,369	\$ 1,205,243	\$ 1,386,030	\$ 1,455,331	\$ 1,513,544
Retail Sales - Tincture	\$ 132,154	\$ 158,585	\$ 182,372	\$ 191,491	\$ 199,151
Retail Sales - Topical	\$ 149,499	\$ 179,399	\$ 206,309	\$ 216,624	\$ 225,289
<b>Gross Receipts</b>	<b>\$ 8,259,616</b>	<b>\$ 9,911,539</b>	<b>\$ 11,398,269</b>	<b>\$ 11,968,183</b>	<b>\$ 12,446,910</b>
<b>TAXES</b>					
State Excise Tax (15%)	\$ 1,238,942	\$ 1,486,731	\$ 1,709,740	\$ 1,795,227	\$ 1,867,037
Community Investment (7%) (City Tax)	\$ 578,173	\$ 693,808	\$ 797,879	\$ 837,773	\$ 871,284
Total State Excise and Community Investment	\$ 1,817,115	\$ 2,180,539	\$ 2,507,619	\$ 2,633,000	\$ 2,738,320
Gross Sales (Less Excise and Community Investment					
Investment	\$ 6,442,500	\$ 7,731,000	\$ 8,890,650	\$ 9,335,183	\$ 9,708,590
Sales and Use Tax (7.75%)	\$ 499,294	\$ 599,153	\$ 689,025	\$ 723,477	\$ 752,416
<b>Gross Sales</b>	<b>\$ 5,943,206</b>	<b>\$ 7,131,848</b>	<b>\$ 8,201,625</b>	<b>\$ 8,611,706</b>	<b>\$ 8,956,174</b>
<b>Culture Community Program (1% Gross Sales)</b>	<b>\$ 59,432</b>	<b>\$ 71,318</b>	<b>\$ 82,016</b>	<b>\$ 86,117</b>	<b>\$ 89,562</b>
<b>COST OF GOODS SOLD</b>					
COGS - Cartridge	\$ 561,956	\$ 674,347	\$ 775,499	\$ 775,499	\$ 775,499
COGS - Beverage	\$ 15,462	\$ 18,555	\$ 21,338	\$ 21,338	\$ 21,338
COGS - Edible	\$ 162,354	\$ 194,824	\$ 224,048	\$ 224,048	\$ 224,048
COGS - Extract	\$ 188,929	\$ 226,715	\$ 260,722	\$ 260,722	\$ 260,722
COGS - Flower	\$ 1,044,185	\$ 1,253,021	\$ 1,440,975	\$ 1,440,975	\$ 1,440,975
COGS - Merchandise	\$ 44,937	\$ 53,925	\$ 62,013	\$ 62,013	\$ 62,013
COGS - Pill	\$ 21,985	\$ 26,382	\$ 30,340	\$ 30,340	\$ 30,340
COGS - Pre Roll	\$ 293,783	\$ 352,539	\$ 405,420	\$ 405,420	\$ 405,420
COGS - Tincture	\$ 38,656	\$ 46,387	\$ 53,345	\$ 53,345	\$ 53,345
COGS - Topical	\$ 43,729	\$ 52,475	\$ 60,346	\$ 60,346	\$ 60,346
<b>Total COGS</b>	<b>\$ 2,415,975</b>	<b>\$ 2,899,170</b>	<b>\$ 3,334,046</b>	<b>\$ 3,500,748</b>	<b>\$ 3,640,778</b>
<b>Gross Profit</b>	<b>\$ 3,564,531</b>	<b>\$ 4,277,437</b>	<b>\$ 4,919,053</b>	<b>\$ 5,165,005</b>	<b>\$ 5,371,605</b>
<b>RETAIL EXPENSES</b>					
Advertising & Marketing	\$ 21,000	\$ 21,630	\$ 22,279	\$ 22,947	\$ 23,636
Equipment	\$ 9,000	\$ 9,270	\$ 9,548	\$ 9,835	\$ 10,130
Rent Estimate	\$ 156,600	\$ 161,298	\$ 166,137	\$ 171,121	\$ 176,255
Repair & Maintenance	\$ 9,600	\$ 9,888	\$ 10,185	\$ 10,490	\$ 10,805
Supplies	\$ 3,600	\$ 3,708	\$ 3,819	\$ 3,934	\$ 4,052
Utilities	\$ 13,800	\$ 14,214	\$ 14,640	\$ 15,080	\$ 15,532
Auto - Vehicle Lease	\$ 2,400	\$ 2,472	\$ 2,546	\$ 2,623	\$ 2,701
Insurance - Commercial Auto	\$ 6,000	\$ 6,180	\$ 6,365	\$ 6,556	\$ 6,753
Insurance - Workers' Compensation	\$ 21,999	\$ 22,659	\$ 23,339	\$ 24,039	\$ 24,760
Insurance - General Liability	\$ 33,000	\$ 33,990	\$ 35,010	\$ 36,060	\$ 37,142
<b>Total of Retail Expenses</b>	<b>\$ 276,999</b>	<b>\$ 285,309</b>	<b>\$ 293,868</b>	<b>\$ 302,685</b>	<b>\$ 311,765</b>
<b>BUSINESS EXPENSES</b>					
Bank Charges	\$ 6,000	\$ 6,180	\$ 6,365	\$ 6,556	\$ 6,753
Security Guard Services	\$ 216,000	\$ 222,480	\$ 229,154	\$ 236,029	\$ 243,110
Janitorial	\$ 6,000	\$ 6,180	\$ 6,365	\$ 6,556	\$ 6,753
Legal & Professional Services (CPA)	\$ 24,000	\$ 24,720	\$ 25,462	\$ 26,225	\$ 27,012
Meals	\$ 6,000	\$ 6,180	\$ 6,365	\$ 6,556	\$ 6,753
Office Supplies	\$ 6,000	\$ 6,180	\$ 6,365	\$ 6,556	\$ 6,753
Admin Services	\$ 96,000	\$ 98,880	\$ 101,846	\$ 104,902	\$ 108,049
Payroll Expenses					
Taxes	\$ 122,430	\$ 126,103	\$ 129,886	\$ 133,783	\$ 137,797
Wages	\$ 956,488	\$ 985,182	\$ 1,014,738	\$ 1,045,180	\$ 1,076,535
Total Payroll Expenses	\$ 1,078,918	\$ 1,111,286	\$ 1,144,624	\$ 1,178,963	\$ 1,214,332
Payroll Processing Fee	\$ 12,434	\$ 12,807	\$ 13,192	\$ 13,587	\$ 13,995
POS Software	\$ 29,400	\$ 30,282	\$ 31,190	\$ 32,126	\$ 33,090
Licensing Fees (State/City)	\$ 130,000	\$ 130,000	\$ 130,000	\$ 130,000	\$ 130,000
<b>Total Business Expenses</b>	<b>\$ 1,887,752</b>	<b>\$ 1,940,484</b>	<b>\$ 1,994,799</b>	<b>\$ 2,050,743</b>	<b>\$ 2,108,365</b>
<b>Net Income</b>	<b>\$ 1,426,779</b>	<b>\$ 2,086,953</b>	<b>\$ 2,924,254</b>	<b>\$ 3,114,263</b>	<b>\$ 3,263,241</b>

# City of Santee – Commercial Cannabis Retail Application

PRO FORMA - 5 YEAR BUDGET	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
<b>INCOME</b>												
<b>Retail Sales</b>												
Retail Sales - Cartridge	\$ 97,565	\$ 113,826	\$ 130,087	\$ 146,348	\$ 154,478	\$ 162,609	\$ 164,235	\$ 165,861	\$ 167,487	\$ 170,739	\$ 173,991	\$ 175,617
Retail Sales - Beverage	\$ 2,685	\$ 3,132	\$ 3,579	\$ 4,027	\$ 4,250	\$ 4,474	\$ 4,519	\$ 4,564	\$ 4,608	\$ 4,698	\$ 4,787	\$ 4,832
Retail Sales - Edible	\$ 28,187	\$ 32,885	\$ 37,583	\$ 42,281	\$ 44,630	\$ 46,979	\$ 47,449	\$ 47,919	\$ 48,388	\$ 49,328	\$ 50,268	\$ 50,737
Retail Sales - Extract	\$ 32,801	\$ 38,268	\$ 43,735	\$ 49,202	\$ 51,936	\$ 54,669	\$ 55,216	\$ 55,762	\$ 56,309	\$ 57,402	\$ 58,496	\$ 59,043
Retail Sales - Flower	\$ 181,289	\$ 211,503	\$ 241,718	\$ 271,933	\$ 287,040	\$ 302,148	\$ 305,169	\$ 308,190	\$ 311,212	\$ 317,255	\$ 323,298	\$ 328,319
Retail Sales - Merchandise	\$ 7,802	\$ 9,102	\$ 10,402	\$ 11,703	\$ 12,353	\$ 13,003	\$ 13,133	\$ 13,263	\$ 13,393	\$ 13,653	\$ 13,913	\$ 14,043
Retail Sales - Pill	\$ 3,817	\$ 4,453	\$ 5,089	\$ 5,726	\$ 6,044	\$ 6,362	\$ 6,425	\$ 6,489	\$ 6,553	\$ 6,680	\$ 6,807	\$ 6,871
Retail Sales - Pre Roll	\$ 51,006	\$ 59,507	\$ 68,008	\$ 76,509	\$ 80,759	\$ 85,010	\$ 85,860	\$ 86,710	\$ 87,560	\$ 89,260	\$ 90,960	\$ 91,810
Retail Sales - Tincture	\$ 6,711	\$ 7,830	\$ 8,948	\$ 10,067	\$ 10,626	\$ 11,185	\$ 11,297	\$ 11,409	\$ 11,521	\$ 11,745	\$ 11,968	\$ 12,080
Retail Sales - Topical	\$ 7,592	\$ 8,857	\$ 10,123	\$ 11,388	\$ 12,021	\$ 12,654	\$ 12,780	\$ 12,907	\$ 13,033	\$ 13,286	\$ 13,539	\$ 13,666
<b>Gross Receipts</b>	<b>\$ 419,455</b>	<b>\$ 489,364</b>	<b>\$ 559,273</b>	<b>\$ 629,183</b>	<b>\$ 664,137</b>	<b>\$ 699,092</b>	<b>\$ 706,083</b>	<b>\$ 713,074</b>	<b>\$ 720,065</b>	<b>\$ 734,046</b>	<b>\$ 748,028</b>	<b>\$ 755,019</b>
<b>TAXES</b>												
State Excise Tax (15%)	\$ 62,918	\$ 73,405	\$ 83,891	\$ 94,377	\$ 99,621	\$ 104,864	\$ 105,912	\$ 106,961	\$ 108,010	\$ 110,107	\$ 112,204	\$ 113,253
Community Investment (7%) (City Tax)	\$ 29,362	\$ 34,256	\$ 39,149	\$ 44,043	\$ 46,490	\$ 48,936	\$ 49,426	\$ 49,915	\$ 50,405	\$ 51,383	\$ 52,362	\$ 52,851
Total State Excise and Community Investment	\$ 92,280	\$ 107,660	\$ 123,040	\$ 138,420	\$ 146,110	\$ 153,800	\$ 155,338	\$ 156,876	\$ 158,414	\$ 161,490	\$ 164,566	\$ 166,104
Gross Sales (Less Excise and Community Investment)	\$ 327,175	\$ 381,704	\$ 436,233	\$ 490,762	\$ 518,027	\$ 545,292	\$ 550,745	\$ 556,197	\$ 561,650	\$ 572,556	\$ 583,462	\$ 588,915
Sales and Use Tax (7.75%)	\$ 25,356	\$ 29,582	\$ 33,808	\$ 38,034	\$ 40,147	\$ 42,260	\$ 42,683	\$ 43,105	\$ 43,528	\$ 44,373	\$ 45,218	\$ 45,641
<b>Gross Sales</b>	<b>\$ 301,819</b>	<b>\$ 352,122</b>	<b>\$ 402,425</b>	<b>\$ 452,728</b>	<b>\$ 477,880</b>	<b>\$ 503,032</b>	<b>\$ 508,062</b>	<b>\$ 513,092</b>	<b>\$ 518,123</b>	<b>\$ 528,183</b>	<b>\$ 538,244</b>	<b>\$ 543,274</b>
<b>Culture Community Program (1% Gross Sales)</b>	<b>\$ 3,018</b>	<b>\$ 3,521</b>	<b>\$ 4,024</b>	<b>\$ 4,527</b>	<b>\$ 4,779</b>	<b>\$ 5,030</b>	<b>\$ 5,081</b>	<b>\$ 5,131</b>	<b>\$ 5,181</b>	<b>\$ 5,282</b>	<b>\$ 5,382</b>	<b>\$ 5,433</b>
<b>COST OF GOODS SOLD</b>												
COGS - Cartridge	\$ 30,078	\$ 35,091	\$ 40,104	\$ 45,117	\$ 47,623	\$ 50,130	\$ 50,631	\$ 51,132	\$ 51,634	\$ 52,636	\$ 53,639	\$ 54,140
COGS - Beverage	\$ 828	\$ 966	\$ 1,103	\$ 1,241	\$ 1,310	\$ 1,379	\$ 1,393	\$ 1,407	\$ 1,421	\$ 1,448	\$ 1,476	\$ 1,490
COGS - Edible	\$ 8,690	\$ 10,138	\$ 11,586	\$ 13,035	\$ 13,759	\$ 14,483	\$ 14,628	\$ 14,773	\$ 14,917	\$ 15,207	\$ 15,497	\$ 15,642
COGS - Extract	\$ 10,112	\$ 11,798	\$ 13,483	\$ 15,168	\$ 16,011	\$ 16,854	\$ 17,022	\$ 17,191	\$ 17,359	\$ 17,696	\$ 18,033	\$ 18,202
COGS - Flower	\$ 55,889	\$ 65,203	\$ 74,518	\$ 83,833	\$ 88,490	\$ 93,148	\$ 94,079	\$ 95,011	\$ 95,942	\$ 97,805	\$ 99,668	\$ 100,599
COGS - Merchandise	\$ 2,405	\$ 2,806	\$ 3,207	\$ 3,608	\$ 3,808	\$ 4,009	\$ 4,049	\$ 4,089	\$ 4,129	\$ 4,209	\$ 4,289	\$ 4,329
COGS - Pill	\$ 1,177	\$ 1,373	\$ 1,569	\$ 1,765	\$ 1,863	\$ 1,961	\$ 1,981	\$ 2,000	\$ 2,020	\$ 2,059	\$ 2,099	\$ 2,118
COGS - Pre Roll	\$ 15,724	\$ 18,345	\$ 20,966	\$ 23,586	\$ 24,897	\$ 26,207	\$ 26,469	\$ 26,731	\$ 26,993	\$ 27,518	\$ 28,043	\$ 28,304
COGS - Tincture	\$ 2,069	\$ 2,414	\$ 2,759	\$ 3,103	\$ 3,276	\$ 3,448	\$ 3,483	\$ 3,517	\$ 3,552	\$ 3,621	\$ 3,690	\$ 3,724
COGS - Topical	\$ 2,341	\$ 2,731	\$ 3,121	\$ 3,511	\$ 3,706	\$ 3,901	\$ 3,940	\$ 3,979	\$ 4,018	\$ 4,096	\$ 4,174	\$ 4,213
<b>Total COGS</b>	<b>\$ 129,312</b>	<b>\$ 150,864</b>	<b>\$ 172,416</b>	<b>\$ 193,968</b>	<b>\$ 204,744</b>	<b>\$ 215,520</b>	<b>\$ 217,675</b>	<b>\$ 219,830</b>	<b>\$ 221,985</b>	<b>\$ 226,296</b>	<b>\$ 230,606</b>	<b>\$ 232,781</b>
<b>Gross Profit</b>	<b>\$ 169,489</b>	<b>\$ 222,774</b>	<b>\$ 254,599</b>	<b>\$ 286,424</b>	<b>\$ 302,337</b>	<b>\$ 318,249</b>	<b>\$ 321,432</b>	<b>\$ 324,614</b>	<b>\$ 327,797</b>	<b>\$ 334,162</b>	<b>\$ 340,527</b>	<b>\$ 343,709</b>
<b>RETAIL EXPENSES</b>												
Advertising & Marketing	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500
Equipment	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750	\$ 750
Rent Estimate	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050	\$ 13,050
Repair & Maintenance	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800	\$ 800
Supplies	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300
Utilities	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150	\$ 1,150
Auto - Vehicle Lease	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200
Insurance - Commercial Auto	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500
Insurance - Workers' Compensation	\$ 1,558	\$ 1,636	\$ 1,717	\$ 1,752	\$ 1,787	\$ 1,823	\$ 1,859	\$ 1,896	\$ 1,934	\$ 1,973	\$ 2,012	\$ 2,053
Insurance - General Liability	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750	\$ 2,750
<b>Total of Retail Expenses</b>	<b>\$ 26,558</b>	<b>\$ 26,636</b>	<b>\$ 26,717</b>	<b>\$ 21,752</b>	<b>\$ 21,787</b>	<b>\$ 21,823</b>	<b>\$ 21,859</b>	<b>\$ 21,896</b>	<b>\$ 21,934</b>	<b>\$ 21,973</b>	<b>\$ 22,012</b>	<b>\$ 22,053</b>
<b>BUSINESS EXPENSES</b>												
Bank Charges	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500
Security Guard Services	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000	\$ 18,000
Janitorial	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500
Legal & Professional Services (CPA)	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Meals	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500
Office Supplies	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500	\$ 500
Admin Services	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000
Payroll Expenses												
Taxes	\$ 8,669	\$ 9,103	\$ 9,558	\$ 9,749	\$ 9,944	\$ 10,143	\$ 10,346	\$ 10,553	\$ 10,764	\$ 10,979	\$ 11,199	\$ 11,423
Wages	\$ 67,730	\$ 71,117	\$ 74,672	\$ 76,166	\$ 77,689	\$ 79,243	\$ 80,828	\$ 82,444	\$ 84,093	\$ 85,775	\$ 87,491	\$ 89,240
Total Payroll Expenses	\$ 76,399	\$ 80,219	\$ 84,230	\$ 85,915	\$ 87,633	\$ 89,386	\$ 91,174	\$ 92,997	\$ 94,857	\$ 96,754	\$ 98,689	\$ 100,663
Payroll Processing Fee	\$ 880	\$ 925	\$ 971	\$ 990	\$ 1,010	\$ 1,030	\$ 1,051	\$ 1,072	\$ 1,093	\$ 1,115	\$ 1,137	\$ 1,160
POS Software	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450	\$ 2,450
Licensing Fees (State/City)	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833	\$ 10,833
<b>Total Business Expenses</b>	<b>\$ 223,520</b>	<b>\$ 231,282</b>	<b>\$ 239,432</b>	<b>\$ 237,855</b>	<b>\$ 241,347</b>	<b>\$ 244,908</b>	<b>\$ 248,540</b>	<b>\$ 252,246</b>	<b>\$ 256,025</b>	<b>\$ 259,880</b>	<b>\$ 263,812</b>	<b>\$ 267,822</b>
<b>Net Income</b>	<b>\$ (54,032)</b>	<b>\$ (8,508)</b>	<b>\$ 15,167</b>	<b>\$ 48,569</b>	<b>\$ 60,990</b>	<b>\$ 73,341</b>	<b>\$ 72,891</b>	<b>\$ 72,369</b>	<b>\$ 71,772</b>	<b>\$ 74,282</b>	<b>\$ 76,715</b>	<b>\$ 75,887</b>

## C. SCHEDULE FOR BEGINNING OPERATION

Culture is an operator with a proven track record in securing regulatory approvals and successfully managing stores in compliance with state and local regulations. We prioritize early engagement with local authorities, building positive relationships with city officials and law enforcement to demonstrate our commitment to the community.

Our compliance team's expertise in cannabis regulations enables us to submit clear and detailed applications while maintaining open communication with regulatory bodies. As a self-funded operation, Culture can quickly begin business activities upon receiving City approval. With funds from accredited investors, we aim to sustain operations in this highly regulated industry and can open a store within six months of approval, thanks to our skilled and experienced team that ensures efficient project execution.



## OUTLINE OF PROPOSED CONSTRUCTION & IMPROVEMENTS

### EXTERIOR

The existing exterior will be cleaned and refreshed while maintaining the building's current aesthetic scheme. Culture will ensure that no cannabis or image of or reference to cannabis will be visible on or from outside the facility. Culture will add security cameras, alarms, and signage prohibiting cannabis consumption and entrance by persons under 21. Landscaping and lighting will be repaired or upgraded as needed to meet security requirements and tasteful design aesthetics. The parking lot and walkways will be cleaned, repaired and/or repainted as needed. Although the facility already exists and is consistent with surrounding properties in the area, Culture's updates will promote quality design and improve its overall appearance. The upgrade process for the exterior is expected to take about four weeks.



### INTERIOR

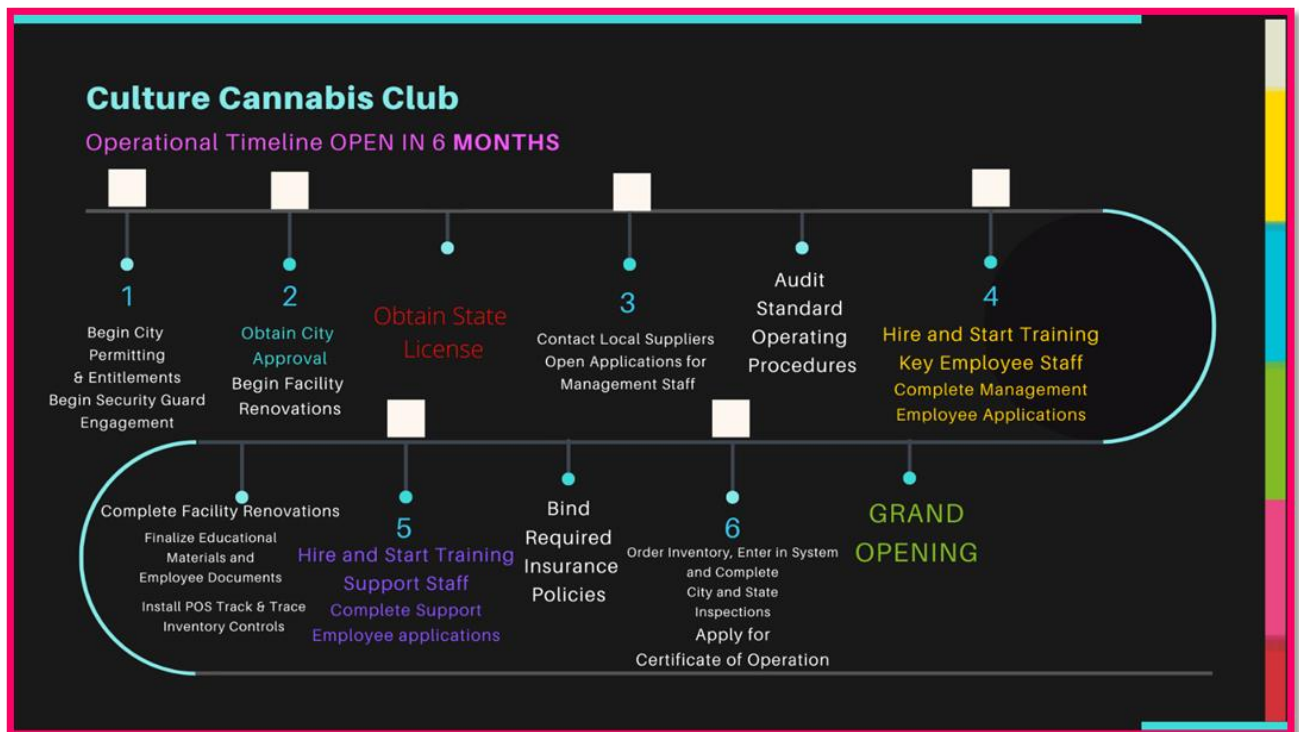
The interior improvements will involve a complete overhaul, including the installation of new walls, modern flooring, and a reinforced storage room wall enclosure. We will also consider potential upgrades to the HVAC and sprinkler systems to ensure optimal comfort and safety. Custom casework designed exclusively for Culture's retail brand will enhance the shopping experience. Once the interior framework is established, we will install new electrical systems, alarm monitoring systems, and advanced security camera systems for added protection. The space will be finished with distinctive artistic touches, eye-catching signage, stylish lighting, and high-end finishes crafted from wood and stone, creating an inviting and upscale retail environment. The entire interior renovation process is anticipated to take approximately 4-6 weeks to complete.







## TIMELINE FOR COMPLETION



### ASSUMPTIONS TO CALCULATE PROJECTED DATES

Applications are due by October 24, 2024. Competitive Review and License Issuance will take approximately 3 months = complete by January 2025. After the City makes a final selection of the 4 licensees, the entitlement process begins March 2025.

### ISSUANCE OF USE PERMIT

June 2025. Culture anticipates it will take anywhere from 2-4 months to obtain a Use Permit from the City Planner.

### ISSUANCE OF BUILDING PERMIT AND COMMENCEMENT OF CONSTRUCTION

September 2025, Culture anticipates it will take 8 weeks to obtain all necessary building permits to commence tenant improvements from the City.

### ISSUANCE OF STATE LICENSE

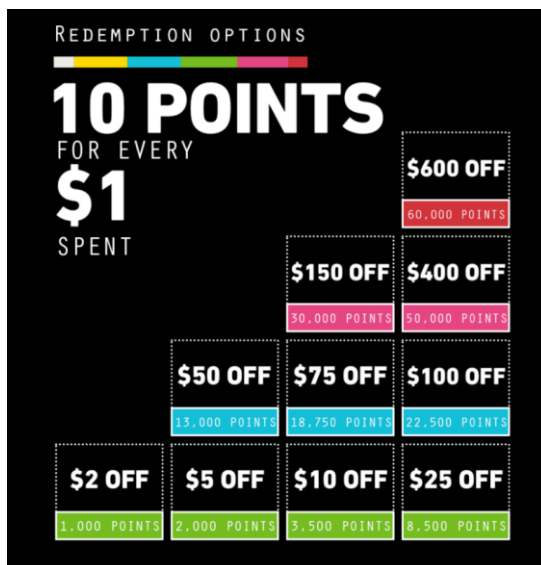
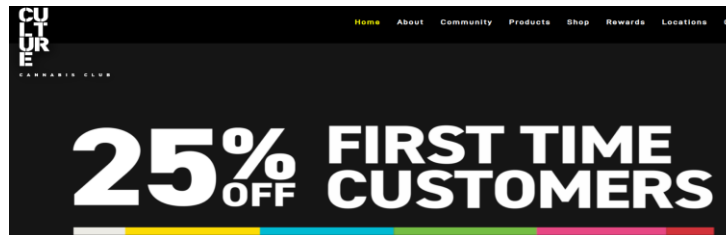
October 2025, Culture obtains a Type-10 Store-Front Retail license for Medicinal and Adult-Use with the DCC. The anticipated processing time to receive an Annual State License is approximately 6 months from the time of issuance of a City license.

### COMPLETION OF CONSTRUCTION

APPROXIMATE December 2025. Culture anticipates project tenant improvements to take 6-8 weeks to complete.

### ISSUANCE OF OTHER REGULATORY PERMITS

January 2026 Complete final Health Department and Business Licensing inspections. Prepare to launch operations.



## D. ABILITY TO OBTAIN BANKING SERVICES



October 17, 2024

Santee Store LLC  
1 Corporate Park, Suite 112,  
Irvine CA 92616

**Re: Banking Services for Cannabis Retail Operations**

We are pleased to confirm that **East West Bank** is prepared to provide **Santee Store LLC** with access to our banking services, contingent upon your successful award and licensure for cannabis retail operations in accordance with applicable state and local regulations.

As a financial institution that complies with the requirements for servicing the legal cannabis industry, we understand the unique needs and compliance obligations faced by cannabis businesses. Upon receiving confirmation of your licensure, **Santee Store LLC** will be eligible for a range of banking services, including but not limited to:

- Business checking and savings accounts
- Secure cash management services
- Online banking and payment solutions

Please note that all services are subject to our standard due diligence process and compliance department approval, including a review of your cannabis license and business documentation, to ensure compliance with both state and federal guidelines.

We look forward to working with **Santee Store LLC** to support your business as it enters the legal cannabis market. Should you have any questions or require further information on the process for initiating banking services, please do not hesitate to contact us at (669) 213-5756.

Thank you for considering **East West Bank** as your financial partner.

Sincerely,

A handwritten signature in blue ink, appearing to read "Martin Kriegler".

Martin Kriegler  
Senior Vice President  
East West Bank



## 2. DAILY OPERATIONS

### SUMMARY

Culture's Operations and Management Plan (O&M) serves as the cornerstone for Santee Culture providing a comprehensive guide that shapes and directs all facets of its operations. In adherence to state regulatory requirements outlined in Title 5 and Title 17, this document will be the guiding framework, ensuring the business operates in full conformance with established standards. Acknowledging the dynamic nature of the industry and regulatory landscape, the O&M will be subject to periodic revisions throughout the lifecycle of the business. Culture's O&M is structured to address various aspects of running a cannabis retail operation. It encompasses essential categories outlined in the regulatory framework such as the ones listed in the table below, providing a roadmap for the safe and successful operation of the business. Beyond the mandatory requirements set forth by the DCC and SMC, the O&M also encourages the inclusion of any additional information deemed critical by the owners. This may encompass unique strategies, practices, or features that differentiate Culture's business model and contribute to its superiority within the industry. In the forthcoming sections, the O&M will scrupulously detail how Culture functions, covering key elements such as security protocols, inventory management, staff training, and compliance measures. The goal is to create a comprehensive and well-thought-out plan that not only meets DCC regulatory standards but also positions the business for success in a competitive market. As the O&M is a living document, its continuous refinement will ensure Culture remains adaptive, resilient, and aligned with evolving industry norms and regulatory expectations.

Culture's proposed operating procedures exemplify a commitment to overall quality, detail, and industry best practices within the cannabis retail space. Our standard operating procedures are carefully crafted to ensure operational efficiency and compliance, drawing from experience in our 4 years operating Culture Retail stores in the United States. How do we demonstrate our processes work? Our stores are open and operating, with no sanctions, violations, or major issues to report. Our efforts to qualify a business at extremely high standards throughout all jurisdictions are successful!

Culture's operations meet and exceed industry best practices for cannabis retailers.

Best Practices include, *but are not limited to*:

<b>Security &amp; Safety of Retail Store</b>	<b>Quality Assurance of Products</b>
<b>Health &amp; Safety of Workers &amp; Guests</b>	<b>Track &amp; Trace of Products</b>
<b>Recordkeeping &amp; Accounting</b>	<b>Code Compliance</b>
<b>Sales Floor Efficiency</b>	<b>Sales Performance</b>

## A. CUSTOMER CHECK-IN PROCEDURES

To ensure a secure environment for employees and customers while preventing product diversion, Culture implements rigorous check-in procedures that exceed State and City requirements, treating the entire facility as a limited access area. All restrooms remain locked and accessible only through a Manager or designee.



Entrance control is maintained by a security guard stationed at the door, and a "buzz-in" electronic entry system restricts access from the reception area to the retail space. Upon entering, customers are greeted by a uniformed security guard who verifies their age and documentation. Individuals under 21 are prohibited from entry unless they are 18 or older and possess a valid government-issued ID along with either a county-issued ID or a physician's recommendation.

Acceptable identification includes a government-issued document, a valid Armed Forces ID, or a passport. Security staff utilize an ID scanner to verify authenticity, enhancing the efficiency of the process. After the initial check, customers proceed to the reception desk, where a Culture receptionist revalidates their ID and any applicable physician recommendations. A digital copy of the documentation is uploaded to Dutchie, creating a customer file that is maintained for at least three years and can be produced within 24 hours upon request. Any loss or damage to these records will be reported to the Police Chief within 24 hours.



Once fully checked in, the receptionist ensures the sales floor is within capacity limits. If space allows, customers are buzzed into the retail area, where security continues to monitor access to ensure a safe shopping experience.

### **LIMITED ACCESS AREAS**

Culture will establish limited-access areas and permit only authorized individuals to enter the limited-access areas. Authorized individuals include individuals employed by Culture as well as any outside vendors, contractors, or other individuals conducting business that requires access to the limited access area. All individuals granted access to the limited access area will be at least 21 years of age, and if not employed by Culture will be escorted at all times by an employee. Culture will maintain a log of all individuals who are not employees who are granted access to the limited access area. These logs will be made available to the city manager, police chief, or their designees upon request.

## **B. LOCATION AND PROCEDURES FOR RECEIVING DELIVERIES DURING BUSINESS HOURS**

Culture receives finished cannabis goods from licensed distributors and microbusinesses authorized for distribution. Transportation is exclusively handled by licensed distributors or microbusinesses, and Culture refrains from the transport of cannabis products. [REDACTED]

[REDACTED]

Collaborating with the Police Department and security professionals ensures the implementation of secure loading/unloading methods, minimizing potential issues like diversion, loss, receipt of non-compliant goods, or shipment errors.

[REDACTED]

Shipments are accepted only during regular business hours, 9 a.m. - 9 p.m. [REDACTED]

[REDACTED]

Vigilance extends to routine monitoring of the premises and surrounding areas for any irregularities. In case of perceived threats, a lockdown may be initiated, and local law enforcement notified, utilizing panic or hold-up alarm buttons strategically placed throughout the facility.

### **SECURING LOADING/UNLOADING AREA**

Culture rigorously controls its inventory processes to ensure optimal product security, employing various features and protocols:

**Features:** Culture prioritizes maximum product security in its inventory processes, featuring surveillance cameras, constant security presence, and strict protocols, including varied delivery intervals. The use of advanced Inventory Control Software further enhances efficiency and reinforces the facility's robust security measures.

**Protocols:** Upon approaching a scheduled delivery, the inventory manager receives a Dutchie notification from the procurement manager, signaling a cleared product delivery. The manager verifies the invoice, shipping manifest, and ensures reconciliation with Dutchie. Shipping/receiving staff coordinate with security to prepare the vendor area, maintaining cleanliness and order. [REDACTED]

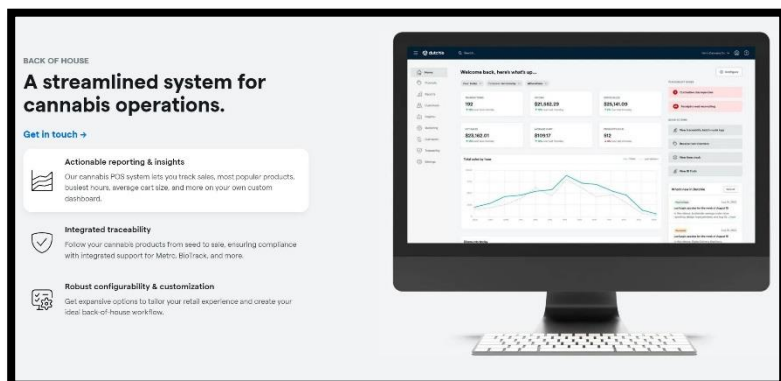
[REDACTED] Upon arrival, the distribution company provides physical copies of necessary documents, including licenses, insurance, driver information, shipping manifest, invoice, and certificates of analysis. Verification occurs in full view of the video surveillance system, recording all areas to prevent loss or diversion. Security staff escorts the distribution driver to the reception area for sign-in, documenting company and driver details. After verification, security notifies shipping/receiving staff and the inventory manager. The video surveillance system records all movements during the unloading process, with security monitoring the exterior shipping/receiving area. Inventory and quality assurance associates conduct counts and inspections for packaging and labeling compliance. [REDACTED]

[REDACTED] The inventory associate records completion details on physical copies of the manifest, signed and returned to the driver. Security escorts the driver back to reception for checkout, monitoring the vehicle until it leaves the site.



## C. POINT-OF-SALE SYSTEM AND METRC INTEGRATION

Culture will create and maintain an active account with the California Track and Trace system METRC, and will demonstrate to the Chief of Police, City Manager or their designees, compliance with METRC. Culture will record the purchase, sale, transfer, transport, return, destruction, or disposal, of any cannabis goods. Culture will utilize a reputable inventory tracking and point-of-sale system to track and report on all aspects of operations. This system is fully integrated with METRC and will ensure compliance with State law, produce historical transactional data for review, and document the location, amounts, and descriptions of all cannabis. All inventories, procedures, and other documents related to inventory control will be maintained on the premises and made available immediately upon request to the City, state, or law enforcement. The system will be able to produce historical transactional data for review.



Subject to City Manager approval Culture will use Dutchie as its inventory management and point-of-sale (POS) software. Dutchie tracks and traces all products from seed to sale to prevent diversion and complies with the minimum requirements of the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA). **Dutchie**

**relays to METRC (via API).** API stands for *application programming interface*, which is a set of definitions and protocols for building and integrating application software. This system is fully integrated with METRC and will ensure compliance with State law, produce historical transactional data for review, and document the location, amounts, and descriptions of all cannabis. All inventories, procedures, and other documents related to inventory control will be maintained on the premises and made available immediately upon request by the City or law enforcement.

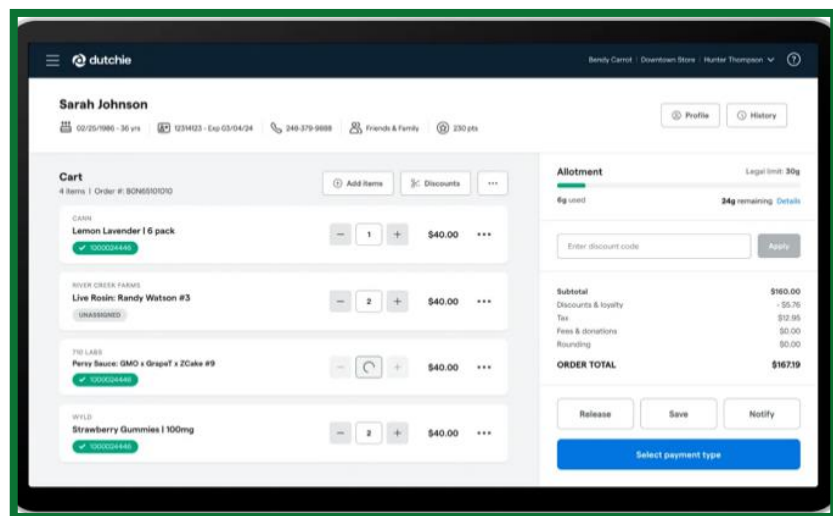
Dutchie serves as a comprehensive repository, encompassing crucial information such as sales records, transportation details, receipts of cannabis goods, returns, destruction and disposal records, packaging information, laboratory testing status and results, patient and consumer data, as well as delivery records, including manifests and receipts. It diligently captures and organizes data pertaining to various commercial cannabis activities as mandated. Essential details, including the name and type of cannabis goods, their unique identifier, quantity by weight or count, date and time of the activity, names and license numbers of involved licensees, and the identity of the responsible employee, will be recorded.

Cannabis products are tracked through the POS system Dutchie to prevent diversion. Inventory audits provide a secondary check, and daily audits ensure Culture has accounted for all products every day. Diversion by staff is highly unlikely. Only approved staff have access to secure storage rooms, and individual key cards are used to access these rooms.

Anti-diversion at the staff level is addressed by:

- Training on company policies and the legal ramifications of product or cash diversion.
- Abundant security system coverage, including cameras, key-card access control, security guards, and the honor system.
- Dutchie inventory tracking and daily inventory audits.

Dutchie is the foundation of Culture's inventory tracking program. It has extremely flexible inventory capabilities perfectly suited to the complex challenges Culture faces in high-security inventory tracking. Culture relies on Dutchie integration with bar code scanners to properly account for all inventory. Every cannabis product received into Culture's facility is tagged with a unique and sequential identification number. This number is visibly displayed and encoded in a bar code. Bar code labels are printed using Dutchie, making receiving labeling processes more accurate and efficient. Culture inventory employees then scan these tags to update inventory quantities in Dutchie. Dutchie API integration with METRC also lets Culture quickly submit, reconcile, and resend reports in near real-time. Dutchie instantly recognizes and displays reporting errors with the METRC error code, so Culture employees can quickly correct and resubmit reports and manage compliance from one central location. Culture delivery employees use the Dutchie location tracking feature to designate inventory for distinct purposes, including inventory staging and fulfilling deliveries. Inventory employees use this feature to quickly and accurately account for each item, regardless of where the product is located within the store. Culture will ensure that such information is compatible with METRC. With the Dutchie inventory management and POS system, Culture tracks all products at all times. At check-in and before admitting any customer to the sales area, Culture uses Dutchie to verify medical patient status and adult-use customer age. Dutchie is then used to process customer transactions at the point of sale, including orders for delivery. Culture chose to employ Dutchie at its stores because it transforms labor-intensive calculations into an automated and error-free process that automatically applies discounts, sales taxes, and individual purchase limits. It also streamlines the customer service and check-out



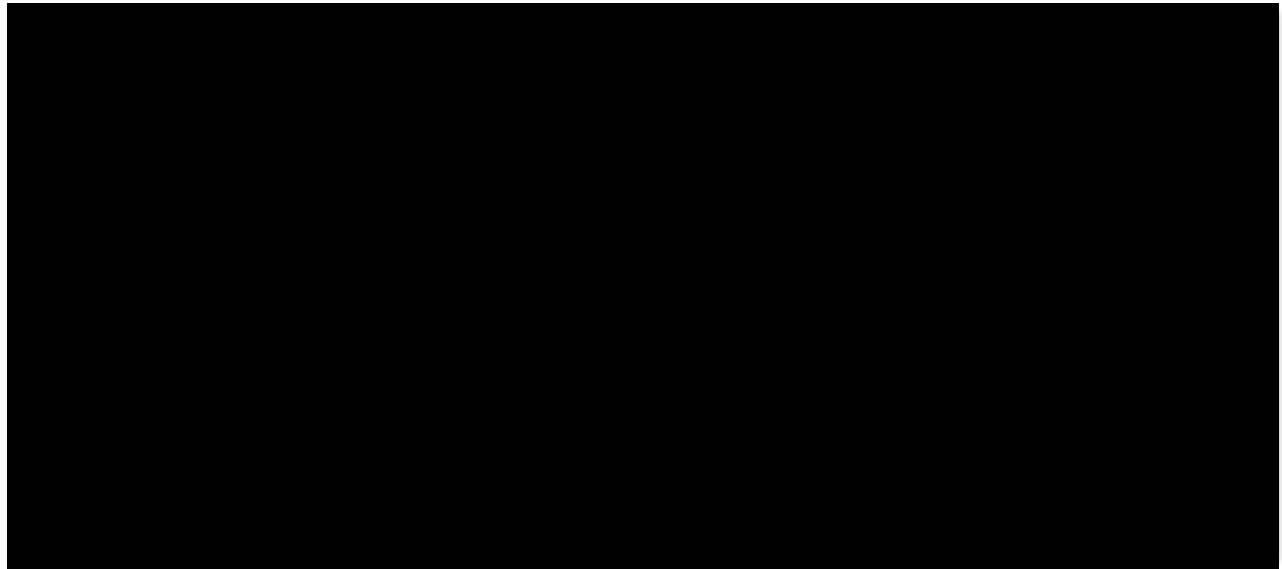
process by offering interactive product menus and integrated cashless payment options. Management can understand staff sales activity through a detailed sales management dashboard. This dashboard provides accurate insight into both cash handling and non-cash payments from each shift to help Culture account for all money movement within each store. Cash handling and inventory compliance is further supported by integrated label printing and the ability to reserve products and assign registers.

### **DESTRUCTION OF PRODUCTS**

Cannabis waste shall be stored, managed, and disposed of per all applicable waste management laws, including, but not limited to, Division 30 of the Public Resources Code. If any of Culture's cannabis product becomes contaminated, recalled, expired, or otherwise rendered unusable, Culture will dispose of the cannabis or cannabis product. Culture's track and trace manager will always be present and oversee any destruction of product and ensure that it is properly recorded. Additionally, Culture asserts that cannabis waste will never be sold for any reason.

### **LOCATION OF POS TERMINALS AND NUMBER**

At Culture's Santee store, ten (10) Dutchie POS stations are set up on the retail sales floor. Security cameras will be located above the POS station to capture the face of every customer purchasing cannabis, with a clear view of the cash registers as well. Since Dutchie terminals are designed to perform POS and track-and-trace functions, additional tablets will be placed in reception, the security room, the shipping/receiving area, and each place cannabis goods are stored. At full capacity, all point-of-sale stations will be utilized for customer sales.





**D. EXPECTED CUSTOMER VOLUME PER HOUR/DAY**

The table below represents Culture's projected customer flow daily. Peak hours are usually from 9 a.m.-11 a.m., and again from 6 p.m.- 9 p.m. The table below shows the approximate number of customers Culture anticipates daily, which are adjusted to also reflect peak months/seasonal traffic. Culture will see a minimum of 350 customers a day during slowest periods. However, Culture anticipates full business numbers to be around 500 customers a day. This number is based on our similar sized stores in cities of similar population and cannabis consumers. Culture estimates to have **20** employees, adding another 5 or so employees once the store reaches maximum sales capacity, to total approximately **25** store employees. At the Santee store, Culture also anticipates seasonal employees. Culture will analyze if adding additional temporary staff for the peak season is necessary. We anticipate another potential **5** employees during summer and high season months.

Culture Customers/Day	Month	Days Per Month	Approximate Customers Per Day	Average Customers Per Hour	Low Hours 11-am-6pm Customers Per Hour	Peak Hours 9am-11am 6pm-9pm Customers Per Hour
	January	31	300-550	55-65	55	65
	February	28	300-550	55-65	55	65
	March	31	300-550	55-65	55	65
	April	30	300-550	55-65	55	65
	May	31	350-550	40-50	40	50
	June	30	350-550	40-50	40	50
	July	31	400-550	55-65	55	65
	August	31	500-550	55-65	55	65
	September	30	300-450	55-65	55	65
	October	31	350-500	40-50	40	50
	November	30	500-550	55-65	55	65
	December	31	500-550	55-65	55	65

**CONTINGENCY PLANS FOR PEAK CUSTOMER VOLUMES AND/OR LOGISTICAL ACTIVITIES  
(BUILDING MAINTENANCE, DELIVERIES, ETC.)**

Culture has established comprehensive contingency plans to address peak customer volumes and various logistical activities, including building maintenance and deliveries. During periods of high customer traffic, Culture dynamically adjusts its staff schedule by adding cannabis consultants, security personnel, and potentially extra managers and receptionists to ensure efficient service, security control, and smooth customer turnover. The utilization of Culture's touchscreen technology enhances the speed and safety of order placements, facilitating faster transactions. To further expedite purchases during rush hours, Culture encourages pre-ordering online. Additionally, deliveries requested after 8:00 p.m. are strategically held until the next morning for fulfillment, ensuring all deliveries are completed before the 8:00 p.m. delivery cut off. In the realm of building maintenance, Culture has a well-structured response system for daily issues, escalating matters to the general manager on-site, who delegates tasks to the appropriate staff or hires professionals such as handymen when necessary. This proactive approach, coupled with a network of vetted third-party professionals, ensures swift and effective resolution of any logistical challenges, maintaining a seamless and secure operation for both customers and employees.

The on-site staffing levels are tailored to accommodate fluctuating customer traffic, with 6 cannabis consultants, 1 security staff, 1 receptionist, and a manager during low hours. As demand peaks, Culture scales up its on-site team to 10-15 cannabis consultants, 2 receptionists, a Manager, and an Assistant Manager. Additionally, during the summer season, Culture adjusts staffing levels to meet the expected surge in customer traffic. Ensuring compliance and diligence in check-in procedures and security surveillance during peak hours is a priority, with thorough training provided to all store staff and delivery drivers to adeptly handle increased customer numbers and their diverse needs. This comprehensive approach guarantees a smooth and secure operational experience for both in-store and online customers.

**E. PROPOSED PRODUCT LINE**

PRODUCT TYPE	BRAND	PRODUCT NAME	PRICE
BEVERAGE	DRINK LOUD	MAUI BLAST (100MG)	9.104
BEVERAGE	DRINK LOUD	CUCUMBER HAZE (100MG)	9.104
CARTRIDGE	FUN UNCLE	SFV OG (1G) CRUISERS	29.214
CARTRIDGE	HIMALAYA	DREAM QUEEN CARTRIDGE (1G) [S]	30.434
CARTRIDGE	JEETER JUICE	AGENT ORANGE (1G)	34.054
CARTRIDGE	PLUGPLAY	VANILLA THRILLA (1G) LIVE RESIN	59.764
EDIBLE	CAMINO	WILD BERRY GUMMIES (100MG) CHILL	17.73
EDIBLE	CANYON	RAINBOW SHERBET (10MG) [H]	5.974
EDIBLE	EMERALD SKY	INDICA PEANUT BUTTER CUPS 10PK - 100MG	16.404
EDIBLE	FLAV	SOUR APPLE (100MG) RINGS	12.794
EXTRACT	APEX	GG#4 [I/H] (1G) LIVE RESIN SAUCE [EMERALD]	37.104
EXTRACT	EVERYDAY DABS	WHITE VELVET (1G) SHATTER	18.574
EXTRACT	HIMALAYA	LUCID BLUE (1G) [S] SUGAR	25.154
EXTRACT	LIME	BRUCE BANNER(1G) [H] LIVE RESIN SUGAR	20.814
EXTRACT	LIME	BLUEBERRY MUFFIN (1G) [S] LIVE RESIN SHATTER	19.414
FLOWER	BIG TREE	CAVIAR (14G) [I]	55.074
FLOWER	BLAZE MOTA	APPLES & BANANAS(3.5G)	40.19
FLOWER	CLAYBOURNE CO.	POWER PACK-DOLE WHIP X HYBRID KIEF (4.5G)	37
FLOWER	DESERT UNDERGR	GARLIC TRUFFLE (3.5G)	39.654
FLOWER	EMBER VALLEY	GEORGIA COSTANZA (3.5G)	38.544
FLOWER	FARMER AND THE I	GEORGIA PIE (14G)	75.044
FLOWER	FARMER AND THE I	GEORGIA PIE (28G)	151.514
FLOWER	MOHAVE	MOHAVE KUSH (3.5G)	33.474
FLOWER	PURE BEAUTY	PINK PANTHER (3.5G)	44.454
MERCH	CULTURE CANNABI	CULTURE SWEATER HOODIE [X-LARGE]	64.404
MERCH	CULTURE CLUB ME	SPEND \$200 GET \$1 PROMO ITEM	0
MERCH	GRIZZLY PEAK	GRIZZLY MEMORIAL DAY BUNDLE	0
MERCH	SELECT	510 BLACK BATTERY	18.144
MERCH	SHERBINSKIS	SHERBINSKIS 510 THREAD BATTERY	20.864
MERCH	VARIETY	STIIIZY HOLIDAY BUNDLE	150
PILL	ABX	GRAB & GO - THC SOFT GEL 200MG SINGLE SOFT GEL	11.124
PILL	BUDDIES	LIQUID DIAMONDS GELCAPS (25MG) [4PC]-SATIVA	6.754
PILL	LEVEL	PROTAB+LIGHTS OUT	35.124
PREROLL	BABY JEETER	TROPICANA COOKIES (2.5G) 5PK [S]	34.044
PREROLL	CANNDESCENT	CHARGE 513 [S] (1G)	15.744
PREROLL	CLAYBOURNE CO.	FLYERS-TANGIMAL(0.5G/2PK)	12.664
PREROLL	CLAYBOURNE CO.	FLYERS-KUSH MINTS (0.5G/5PK)	30.384
TINCTURE	PAPA & BARKLEY	1:30 THC RELEAF TINCTURE (30ML)	54.054
TINCTURE	PAPA & BARKLEY	1:3 THC RELEAF TINCTURE (15ML)	34.914
TINCTURE	YUMMI KARMA	MOOD MAGIC DROPS (300MG) [30ML]	32.914
TOPICAL	KUSH QUEEN	LOVE 1:1	11.814
TOPICAL	MARY'S MEDICINAL	BOGO 99% OFF - CBN TRANSDERMAL GEL PEN	54.724
TOPICAL	PAPA & BARKLEY	CBD RELEAF PATCH	12.574



## BREAKDOWN OF SALES BY PRODUCT CATEGORY

Culture carries a variety of brands and strains, which are adjusted to meet the quantity and variety demanded by our customer base at each location.

### ACCESSORIES & APPAREL

We carry accessories such as jars, boxes, rolling devices, smoking-vaping devices, batteries, and glassware. We carry our branded apparel, such as t-shirts, hats, and jackets.

### EDIBLES

We currently offer 87 different edible options of varying weights and quantities, under 17 different brand names. Edibles are a large part of the growing cannabis market. A Cannabis edible is a THC-infused product that can be consumed by the client. Infusing Cannabis into foods is a long-practiced and highly effective method to use Cannabis as medicine.

### CONCENTRATES

Our line is designed to provide high levels of cannabinoids and THC in a readily accessible form, which provides instant relief for serious conditions. We currently carry 115 different oil cartridges from 10 different brands, 53 oil extracts from 11 different brands, and 35 solvent-less extracts from 5 different brands.

### RAW FLOWER

We currently offer 70 raw flower products, under 17 different brand names. Raw Cannabis Flower is sold in a mix of Indica and Sativa, depending on client demand. Indica is known to reduce nausea, increase appetite, and fight depression, while Sativa is known for its uplifting effects that energize clients with strong cerebral effects.



Anticipated Product Mix	
Category	% Of Total Sales
Prepackaged Flower	21.92%
Vaporizing Cartridges	20.50%
Pre-Rolls	26.57%
Edibles	17.60%
Extracts	4.18%
Merchandise	6.22%
Beverages	0.91%
Pills	0.87%
Tinctures	0.63%
Topicals	0.60%
Grand Total	100.00%

### TINCTURES

A Cannabis tincture is a cannabis-based extract that is infused with alcohol. We carry 30 different tinctures. This product provides easy dosing for clients desiring rapid absorption.

### TOPICALS/PERSONAL CARE

We currently carry 31 different topical/personal care options for our customers, from creams, body oils, bath soaks, patches, and lip balms. Topicals are ideal for assisting clients who are arthritic or have aching injuries. Topicals have an analgesic and anti-inflammatory effect of reducing or eliminating pain.

Culture strongly feels that no one may violate the rights of others, and no substance use excuses any such violation. Regardless of the legal status of cannabis, responsible users will adhere to emerging tobacco smoking protocols in public and private places accepted standards of courtesy and public propriety and respects the preferences of those who wish to avoid cannabis entirely.

Culture will limit the quantity or amount of cannabis and cannabis products readily available in the retail sales area to quantities or amounts required to meet the daily demand.



The medical cannabis and recreational cannabis products that we offer at Culture Cannabis Club will be just the beginning of your own personal cannabis journey. With the high quality cannabis products on our shelves, you can begin to live your life in a completely different way. Our beloved healing plant helps to open arms and calm minds. Here at Culture Cannabis Club, we believe in helping our customers and medical cannabis patients find relief and relaxation through an amazing cannabis experience.

SHOP

## F. CONFORMANCE TO LOCAL AND STATE LAWS

Culture is unwaveringly committed to adhering to the regulations outlined in **Department of Cannabis Control (DCC) Title 4, and City of Santee Chapter 7.04 Cannabis Business Permit Ordinance, § 7.04.340 General Operating Requirements, § 7.04.360 Operating Requirements for Retail Store Front Facilities, et al.**

We prioritize strict compliance with these provisions, ensuring that our operations align with the city's guidelines and contribute positively to the community. Our commitment to regulatory adherence underscores our dedication to responsible and lawful business practices in the City of Santee.

**OPERATIONAL REQUIREMENTS: DCC TITLE 4 CHAPTER 3:** Culture implements standard operating procedures to meet the numerous operational requirements outlined in Title 4 Chapter 3 specific to cannabis retailers of the State of California and the Department of Cannabis Control.

**BASIC OPERATING PRINCIPLES:** To enhance security, sales staff retrieve products from secure storage, bag them in approved exit packaging, and escort customers to the exit after purchase. This practice minimizes theft risks associated with having physical products openly accessible. All products are moved to secure storage at the end of the day. During peak hours, additional sales associates, security, and potentially a manager and receptionist are scheduled. The

use of touchscreen technology expedites orders, and pre-ordering online is encouraged during rush hours for faster transactions. Deliveries requested after 8:00 p.m. are held until the next morning to complete before the 9:00 p.m. delivery cut-off. Medical Marijuana Identification Card (MMIC) recommendations are not provided on licensed premises, and physicians cannot conduct services in or around the premises. Patients must present a valid MMIC and physician recommendation letter to Reception and Security before entering.

**CHILD-RESISTANT PACKAGING:** Culture utilizes sealed, tamper-proof, and child-resistant packaging for cannabis products. The purchased items are discreetly placed in opaque bags without any child-attractive visuals, prioritizing safety and responsible packaging practices.

**PACKAGING AND LABELING FOR QUALITY ASSURANCE:** Culture's quality assurance team conducts initial and periodic quality checks on cannabis goods in adherence to 4 CCR § 15406. Before retail sale, products must pass these checks:

- Goods received only from licensed distributors or authorized microbusinesses
- Verification of goods within specified best-by, sell-by, or expiration dates
- Compliance with Business and Professions Code § 26130 for manufactured products
- Mandatory laboratory testing as per local and state laws
- Matching batch numbers on packaging and certificates for regulatory compliance
- Adherence to packaging and labeling standards outlined in Business and Professions Code § 26120

Culture's quality assurance associates ensure packaging and labeling meet specified standards for all cannabis products at Culture stores.

- Products and packaging must not appeal to children or be easily mistaken for non-cannabis items.
- Packages must be tamper-evident, child-resistant, re-sealable, and fully labeled.
- Each cannabis product is tracked with unique ID numbers for identification and tracking.
- Cannabis products must include the following information on labels:
- Date of manufacturing and packaging
- Certificate of Analysis (COA)
- Expiration date, if applicable
- Ingredients and known allergens (nuts, etc.)
- Source and date of cultivation
- Type of cannabis or cannabis product





- Number of servings per package
- Pharmacologically active ingredients (THC, CBD, etc.) and amount (mg per serving)
- "FOR MEDICAL USE ONLY" (for medicinal cannabis)
- Universal symbol for cannabis
  - Government Warning: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

**NO CANNABIS CONSUMPTION ON PREMISES:** Culture strictly prohibits the consumption of cannabis or cannabis products within or outside the dispensary. Additionally, the sale, dispensing, or consumption of alcoholic beverages or tobacco on or about the premises is strictly forbidden.

**NO CANNABIS GRAPHICS NOR OUTSIDE STORAGE ON PREMISE:** Culture ensures that cannabis or related graphics remain unseen from the facility's exterior. Delivery service vehicles remain unmarked, and all cannabis or cannabis products are stored exclusively within the secure storage room.

**SIGNAGE:** Culture's store prominently displays 15-point type signage conveying essential messages, including warnings about the illegality of cannabis sales without a city license, the consequences of secondary sale or distribution, restrictions on loitering and consumption, a caution about impaired driving, and the California Prop. 65 warning regarding cannabis smoke.

**TRACK & TRACE – TITLE 4 ARTICLE 6 §15051 METRC:** Culture adheres to §15051 by maintaining an active METRC account for accurate data entry through routine audits and third-party verification to prevent bias, complying with DCC law.

**INVENTORY – TITLE 4 CHAPTER 3 §15406:** Each received cannabis product is tagged with a unique identification number, scanned into inventory via barcode, and adheres to §15406 of Title 4 Chapter 3.

**RETURNS – TITLE 4 ARTICLE 7 §15052:** Following §15052, Culture accepts or rejects cannabis shipments based on accuracy, damages, non-compliance, or expiration, recording reasons in **Dutchie** and relevant documents.

**DESTRUCTION OF PRODUCTS:** Culture manages cannabis waste according to applicable laws, disposing of contaminated, recalled, or expired products under the oversight of the track and trace manager, ensuring proper recording and never selling cannabis waste.

**ENVIRONMENTAL SUSTAINABILITY – TITLE 4 ARTICLE 2 §15010:** Culture complies with the California Environmental Quality Act, evaluating facilities during selection for potential environmental impacts and considering land use history, accessibility, traffic conditions, and more.

**RECORDS RETENTION – TITLE 4 ARTICLE 3 §15037:** Culture maintains accurate electronic records of revenues, expenses, assets, and liabilities, filing a sworn statement annually or upon the city's request as per §15037.

**RECORD KEEPING:** Culture recognizes records as crucial for operational improvement, financial management, audits, and regulatory compliance. Electronic records, including patient records, manifests, sales data, and delivery receipts, will be securely stored, backed up daily on an encrypted cloud service, and protected against unauthorized changes. Physical records will be electronically stored in redundant, secure data centers to meet state and federal document storage rules.

**ANNUAL AUDIT:** Culture commits to an annual financial audit by an independent certified public accountant, aligning with generally accepted auditing and accounting principles. The audit covers discussions, analyses, and verifications of all required records, presented in a compatible electronic format for the city's convenience.

**REPORTING INCIDENTS:** Culture promptly notifies the City Manager of significant discrepancies in inventory, criminal activities, loss or alteration of records, or security breaches within 24 hours of discovery.

**EMPLOYEE REGISTRY:** Culture maintains a comprehensive register of ownership, officers, managers, employees, agents, and volunteers, providing records to the City Manager upon reasonable request.

**REPORTING INCIDENTS OF DIVERSION:** Utilizing inventory software and employee training, Culture ensures accurate inventory accounting. Reconciliation processes verify physical inventory consistency with transactional records, addressing any discrepancies.

**RECALLS:** Culture's rapid recall process, activated within 24 hours of notice, is led by the quality assurance manager with support from inventory and procurement teams. The decision to recall aligns with Consumer Products Safety Commission standards, with close consultation involving the DCC. The inventory manager utilizes **Dutchie** to track and record essential details for recalled cannabis goods. This streamlined approach ensures a swift, well-documented, and compliant recall process prioritizing consumer safety and regulatory adherence.

**QUARANTINE AND DESTRUCTION:** Recalled goods undergo a 72-hour minimum quarantine, rendered unusable through methods compliant with state laws. The final mixture is disposed of by an authorized waste hauler, with detailed tracking in Culture's **Dutchie** POS and inventory management software.

**HOURS OF OPERATION:** Culture's retail and delivery operations run from 9:00 a.m. to 9:00 p.m. daily. Outside these hours, only non-sales-related activities pertinent to the business occur.

Retail delivery starts at 9:00 a.m. and concludes by 8:00 p.m., with no orders accepted after 8:00 p.m. Uniformed security is on-site during all operating hours and store openings/closures. Culture collaborates with a licensed security provider and an after-hours patrol company for added security measures.

	MON	TUE	WED	THU	FRI	SAT	SUN
RETAIL	9:00 a.m. – 9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. –9:00 p.m.	9:00 a.m. –9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. –9:00 p.m.
DELIVERY	9:00 a.m. – 9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. –9:00 p.m.	9:00 a.m. –9:00 p.m.	9:00 a.m. – 9:00 p.m.	9:00 a.m. –9:00 p.m.
HOLIDAY SCHEDULE -  NATIONAL HOLIDAYS	OPEN 365 DAYS	LIMITED HOURS FROM  11 a.m. –  7 p.m.					

**CUSTOMERS SERVED PER HOUR/DAY:** Culture projects daily customer flow, with peak hours from 9 a.m. to 11 a.m. and 6 p.m. to 9 p.m. Anticipated daily customers range from a minimum of 300 during slower periods to an expected 550 during full business hours, based on similar-sized stores in comparable locations.

**CASH PROTOCOLS FOR SALES:** To safeguard against theft and diversion, Culture implements cash monitoring through an accounting software system, panic alarm buttons at cashier stations, and daily cash removal for counting and storage. Senior management oversees dual-custody practices during cash handling, ensuring two-person verification for daily deposits into the TL-30 rated cash safe. Training programs educate employees on secure cash management, [REDACTED]. Random audits and safe payment methods such as credit cards and cashless ATMs are employed to reduce on-site cash, promoting legal compliance and information security.

**CASH PROTOCOLS FOR TRANSPORTING AND DEPOSITING:** Culture's storage and transportation plan outlines secure procedures for transporting currency. Emphyreal Logistics, employing an armored vehicle, transports cash deposits to the bank. Senior management supervises employee activities, including counting, signing logs, utilizing tamper-resistant depository bags, and recording deposit information. [REDACTED]



**MEDICAL USE DAILY LIMITS:** Culture strictly adheres to state law regulations on daily purchase limits for medicinal cannabis. In a single day, we do not sell more than the following amounts to a single medicinal cannabis patient or their primary caregiver:

- 8 ounces of medicinal cannabis (dried mature flowers or plant conversion per Health and Safety Code section 11362.77)
- 12 immature cannabis plants

In cases where a medicinal cannabis patient's valid physician's recommendation indicates different amounts, the patient may purchase an amount consistent with their needs as recommended by the physician. These limits may not be combined, ensuring compliance with the specified restrictions. Culture takes responsibility for verifying compliance with cannabis concentrate limits in manufactured cannabis products.

**ADULT USE DAILY LIMITS:** For adult-use cannabis customers, Culture imposes the following daily purchase limits:

- 28.5 grams of non-concentrated cannabis
- 8 grams of cannabis concentrate (as defined in Business and Professions Code section 26001), including cannabis concentrate in cannabis products
- 6 immature cannabis plants

Our POS system activates an alert to notify the Sales Associate if these limits are exceeded. In such cases, the items are promptly removed and securely stored in inventory. Culture strictly refrains from dispensing any free samples for any reason.

**DELIVERY PROTOCOLS:** Culture expects to start **with one company owned delivery vehicle, and** may add a second and third vehicle as customer demand increases. The delivery vehicles will have some of the most advanced features in the cannabis industry. Each vehicle's appearance will be as plain as possible, so as not to draw any unwanted attention, and feature secure storage, GPS tracking, and alarm systems. Culture will only use vehicles with no markings or other indication that it is being used to transport cannabis.



Culture will limit itself to serving customers within the permitted premises or at a delivery address that adheres to specific requirements. These include restrictions such as prohibiting the sale and delivery of cannabis goods through pass-through windows or slide-out trays to the exterior of the premises.

Additionally, Culture will not operate as drive-in or drive-through establishment where cannabis goods are sold to individuals within a motor vehicle. Sales and deliveries of cannabis goods to individuals in motor vehicles by any means or method are strictly prohibited. Furthermore, all cannabis goods sold Culture will be enclosed in child-resistant packaging to ensure compliance with safety standards.

### **PREPARING ORDERS**

The sales or inventory associate or other employee charged with receiving and processing delivery orders through Culture's POS system follows the Culture delivery fulfillment procedures described below.

### **ADDRESS VERIFICATION**

Addresses are first verified at the time the order is placed using Culture's dispatch application, Dutchie, which is integrated with both Dutchie and METRC. Though addresses are verified during the online order process, the inventory manager or other manager on duty uses Dutchie, and integrated mapping applications to re-verify that the delivery address is a physical California address that is not in a prohibited location or building. Once a manager has re-verified the delivery address, or confirmed the address was previously marked verified in the customer's Dutchie file, the manager will generate and print a delivery manifest for the delivery employee. The delivery employee is provided with instructions for the order of deliveries and routes and reminded of cash protocol by the manager.

### **ORDER PROCEDURES**

The manager verifies the delivery driver's cash on hand. Products prepared for delivery are loaded into the vehicle's secure, fixed, storage container. All loading of deliveries is done by the delivery driver and a security guard in the approved secure loading area. No cash or cannabis goods are loaded into the delivery vehicle anywhere but in the secure loading area. A delivery employee cannot leave Culture's premises with cannabis goods without at least one delivery order that has already been received and processed. Before leaving Culture's premises, the delivery driver obtains a delivery inventory ledger of all the cannabis goods in the vehicle and keeps this ledger with them during their route. For each cannabis good, the delivery inventory ledger includes:

- Type of good
- Brand of good
- Retail value of each good
- Track and trace identifier (UID) of each good
- Weight, volume, or other accurate measure of the amount each good

Following each customer delivery, the delivery inventory ledger is updated to reflect the current inventory in possession of the delivery driver (i.e., in the vehicle).

### CUSTOMER IDENTITY VERIFICATION



Upon arrival at the delivery location, the delivery employee must verify the customer's identity by checking a valid, unexpired California driver's license, passport, or other acceptable form of government-issued identification. The driver may only physically deliver the cannabis product to the consumer that ordered the product. The driver must confirm the identity of the person by verifying that the identification document shown at delivery matches the one submitted at the time the order was placed. All customers must submit photos of their identification documents when placing their first orders, either by uploading through Culture's web portal or by texting with a Culture cannabis consultant. Delivery

employees can access these images via Dutchie's integration with Dutchie's mobile driver app and compare them to the documents presented in person. If the documents do not match, the delivery employee will refuse to complete the delivery. If they do match, the delivery employee takes a photo of the front and back of the documents and uploads them to the customer's Dutchie file as a record of in-person identify verification using the Dutchie mobile driver application.

Once payment is complete, the delivery employee hands over the cannabis goods. The customer then signs a copy of the delivery request receipt. A copy of the signed delivery request receipt is furnished to the customer so that they may maintain it and make it available upon request by the licensing authority and law enforcement officers. An electronic version is also automatically saved in Dutchie. Additional hard copies shall be printed upon request. All delivery request receipts, and identification verifications are maintained with Culture records for no less than seven (7) years.

### SIGNAGE AND NOTICES

Business identification signage for the Facility shall conform to the requirements of Chapter **13.32** (Signs) of the City code, including, but not limited to, seeking the issuance of a City sign permit, if applicable.

- No signs placed on the premises of a cannabis business shall obstruct any entrance or exit to the building or any window.
- Each entrance to a cannabis business shall be visibly posted with a clear and legible notice indicating that smoking, ingesting, vaping, or otherwise consuming cannabis on the premises or in the areas adjacent to the cannabis business is prohibited. The sign shall be no larger than two feet by two feet.
- Business identification signage shall be limited to that needed for identification only and shall not contain any logos or information that identifies, advertises, or lists the services or the products offered. No cannabis business shall advertise by having a person holding a sign and advertising the business to passersby, whether such person is on the premises of the cannabis business or elsewhere, including, but not limited to, the public right-of-way.

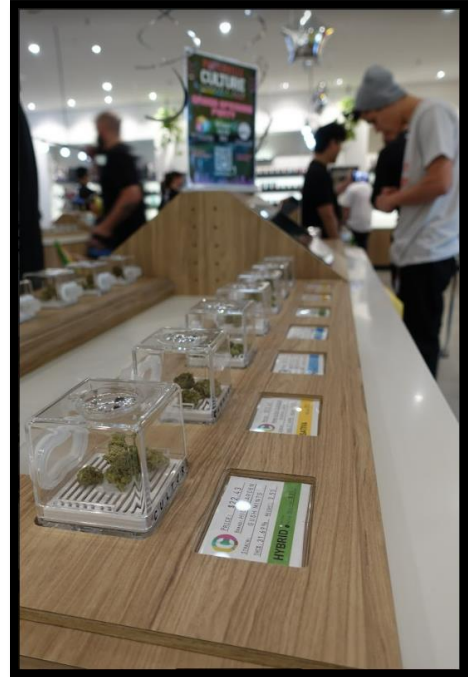
- Signage shall not depict any image of cannabis or cannabis products. No permanent banners, flags, temporary billboards, or other prohibited signs may be used at any time.

### AIR QUALITY/ODOR CONTROL

Culture has established a comprehensive odor control plan that leverages advanced technology and innovative devices to eliminate detectable cannabis odors beyond our premises. Products are stored in sealed, child-resistant containers, and strict no-consumption policies are enforced by vigilant employees and security staff.

Our unique retail approach incorporates touchscreen technology for customer education and streamlined ordering, reducing the visibility of cannabis products. We proactively manage potential odor sources, including display samples and waste, while employing an air-purifying odor control system.

Our CLEANLEAF air filtration systems effectively capture carbon-based contaminants, with air changeovers occurring every 20 minutes. These systems are discreetly integrated into ceilings or walls, operating during business hours and after closing to maintain air quality.



Staff training is prioritized to ensure our team can identify and manage odors daily. We adhere to a detailed maintenance schedule for filter replacements and system inspections, supported by a daily odor checklist to ensure ongoing effectiveness.

### ADHEREANCE TO SANTEE MUNICIPAL CODE SECTION 7.04.360

By implementing these compliance measures, Culture is dedicated to operating responsibly within the community and ensuring the safety and legality of our cannabis retail business.

### CANNABIS RETAILER PERMITS

We will ensure that our business operates within the limit set by the City Council regarding the number of cannabis retailers. Our cannabis business permit will be obtained and maintained in accordance with all city regulations. Regular checks will be conducted to ensure compliance with the conditions of the permit.

### AGE VERIFICATION

Our staff will implement strict age verification processes at the entrance and point-of-sale. Each customer will be required to present a valid government-issued ID to confirm they are 21 or older for adult-use purchases, or to show a valid doctor's recommendation for those aged 18 to 20. Training sessions will be conducted to ensure all employees understand and comply with these requirements.



## **DOCUMENTATION CHECKS**

Customers will need to show their government-issued ID and, if applicable, a doctor's recommendation or medical cannabis card upon entering and at the time of purchase. We will not provide or facilitate the acquisition of doctor recommendations at our retail location. Staff will be trained to recognize legitimate documentation to avoid any potential violations.

## **SECURITY PERSONNEL**

We will employ licensed, uniformed security personnel who meet the requirements set forth by the Bureau of Security and Investigative Services. They will monitor site activity, control loitering, and serve as a visual deterrent to unlawful activities. All security personnel will be trained in compliance with Chapters 11.4 and 11.5 of the Business and Professions Code, and documentation of their licensing will be maintained on-site.

## **PRODUCT INVENTORY CONTROL**

To comply with inventory regulations, we will limit the quantity of cannabis products displayed for sale to only what meets daily demand. Additional inventory will be securely stored in a locked area inaccessible to customers, vendors, and visitors, ensuring compliance with local regulations regarding product storage.

## **RESTROOM ACCESS**

Public restrooms will remain locked and under the control of management to ensure compliance with municipal regulations. Employees will manage restroom access, and procedures will be in place for monitoring usage.

## **SALES RESTRICTIONS**

We will only conduct sales within the licensed premises, ensuring no sales are made through windows or to individuals in vehicles. All cannabis goods will be packaged in child-resistant containers, complying with safety standards. Our point-of-sale areas will be monitored by a video surveillance system to record transactions clearly, capturing facial features for identification.

## **ACCESS CONTROL**

Access to the retail premises will be strictly limited to individuals aged 21 and older, with exceptions for those aged 18 and older who possess a valid physician's recommendation for medical cannabis. Staff will ensure compliance by checking IDs at the entrance.

## **AUTHORIZED SALES**

Our sales policy will enforce that only adult-use cannabis is sold to individuals 21 years or older, and medicinal cannabis is available to those aged 18 to 20 with valid physician documentation. Staff will receive training to ensure they are well-versed in these regulations.

## **LIMITED ACCESS AREAS**

We will establish designated limited-access areas within the facility. Only authorized personnel, including employees and vetted contractors, will be allowed entry. All access will be logged, and these records will be made available to city authorities upon request.

## **OPERATING HOURS COMPLIANCE**

Our storefront will operate strictly within the regulated hours of 9:00 a.m. to 9:00 p.m., seven days a week. Staff will be trained to adhere to these hours, and management will conduct regular reviews to ensure compliance.

## **SECURITY REQUIREMENTS**

We will incorporate all security measures outlined in Section 7.04.320 into our operations, including surveillance systems, alarm systems, and staff training. Regular security audits will be conducted to ensure that all requirements are met consistently.

## **G. TRACKING AND MONITORING OF PRODUCTS TO PREVENT DIVERSION**

Effective tracking and monitoring of cannabis products in a retail store is crucial for preventing diversion and ensuring compliance with regulations. Implementing a robust inventory management system allows retailers to accurately track product movement from the moment it arrives until it is sold. This system should include real-time inventory counts, barcode scanning, and digital logging of sales transactions. Regular audits and reconciliations help identify discrepancies, while employee training on compliance and ethical practices reinforces the importance of vigilance. Additionally, utilizing surveillance systems can deter theft and unauthorized access, creating a secure environment that protects both the business and the community from illicit activities. By prioritizing these measures, Culture can foster a responsible cannabis market while minimizing the risk of diversion.

Culture's use of inventory software and robust employee training enables it to account for all its inventory. Company conducts weekly inventory reconciliation of the entire existing inventory. Additionally, sales and inventory staff perform product and cash reconciliation at the close of every business day. The purpose of the weekly inventory reconciliation is to verify that the physical inventory is consistent with Culture's transactional records. Inventory reconciliation is led by the store's inventory manager, and the results are recorded and stored for seven (7) years.

## **ANNUAL AUDIT**

Culture will share with the City Manager or their designee an audit of its financial operations for the previous fiscal year, complete and certified by an independent certified public accountant in accordance with generally accepted auditing and accounting principles.

- The audit includes, but not be limited to, a discussion, analysis, and verification of each of the records required to be maintained pursuant to this section.
- The information contained in the audit is made available in standard electronic format, which is compatible with programs and software used by the city, and which can easily be imported into either Excel, Access, or any other contemporary software designated by the City Manager.

Diversion by staff is highly unlikely. Only approved staff have access to secure storage rooms, and individual key cards are used to access these rooms.

Anti-diversion at the staff level is addressed by:

- Training on company policies and the legal ramifications of product or cash diversion.
- Abundant security system coverage, including cameras, key-card access control, security guards, and the honor system.
- Dutchie inventory tracking and daily inventory audits.

## **DELIVERY FULFILLMENT**

Before each delivery, Culture will prepare a hard copy or electronic delivery request, as per 4 CCR §15420(a-b). The receipt will include: the company name and address; the first name and employee number of the delivery driver and the employee who prepared the order; the customer number who requested the delivery; the date and time of the request; the delivery address; a detailed description of all goods requested for delivery, including weight, volume, or any other accurate measure of amount; and amount customer paid, including taxes, fees, and delivery charges. At the time of delivery, the driver will obtain a signature from the customer who received the delivery. The driver will then provide the customer with a receipt, retaining a second signed copy for company records. In accordance with 4 CCR §15420(c), employee numbers and customer numbers will be unique and readily identifiable by Culture should the Department request records.

A delivery driver's route will be defined by 4 CCR §15421. The employee will be permitted to drive only 1) from the retailer to the delivery address, 2) from the delivery address to the retailer, and 3) between delivery addresses. Training will emphasize that the driver may deviate from the delivery path for rest, fuel, vehicle repairs, or if conditions become unsafe, but should notify Culture management.

Culture will ensure that the legal business name is provided before ordering and that the customer receives an invoice or receipt showing the dispensary name and license number. Further, in accordance with 4 CCR §15416, Culture will not deliver to any physical address outside of the State of California or leave the state during the delivery, nor deliver to a government- or tribal-owned location, school, daycare center, or youth center. All cannabis and cannabis products will be cultivated, manufactured, and transported by licensed facilities that fully comply with State and local regulations.

## **RISK MANAGEMENT GUIDELINES FOR DELIVERY SERVICES**

Culture ensures that its delivery drivers undergo comprehensive training, aligning with the guidelines outlined in the employee handbook and complying with all local and state regulations. The training covers various scenarios, including customer interactions, emergency communication, vehicle incidents, law enforcement encounters, theft prevention, and alternative route identification.

To affirm driver safety and security, Culture conducts random "ride-along" trips with a manager or assistant manager, and the company may choose to employ body-camera devices for enhanced security and training purposes. During deliveries, drivers utilize vehicle-mounted, hands-free navigation systems, strictly avoiding hand-held devices and personal cell phone use while driving. For record-keeping and accountability, delivery drivers maintain a detailed log of all stops from

departure to return, including the purpose of each stop. These logs are submitted to the manager upon the driver's return, adhering to Culture's record-keeping policies.

Upon completing a delivery, drivers promptly return to Culture premises, especially if no additional deliveries are scheduled within a 30-minute period after the last delivery. Culture ensures that delivery requests, received from customers before arrival, are provided to the delivery employee as a delivery request receipt. Employees access these requests through Dutchie on mobile devices and carry hard copies as backups for customer reference and record-keeping in case of Dutchie access issues.

## **H. WASTE MANAGEMENT PLAN**

While it is the intent of Culture to achieve a zero-waste operation, Culture wants to ensure that it follows all local, county, state, and federal requirements for waste disposal. Culture has crafted a Waste Management Plan that ensures compliance with all regulations stated in 4 CCR §17223 while driving the company toward its zero-waste goal. For the purposes of Culture's Waste Management Plan, waste is divided into the following categories:

- Solid Waste
- Recycling
- Organic Waste
- Electronic Waste
- Compostable Cannabis Waste
- Non-Compostable Cannabis Waste

Culture does not anticipate producing any hazardous waste. In the event waste may be hazardous, Culture will engage its cannabis waste hauler to complete a waste profile and determine whether hazardous waste disposal services are required.

It is Culture's goal to not only understand the importance of the various types of waste, but to properly implement sorting procedures to ensure that each type of waste is properly disposed of. Each type of waste will have a designated bin that is properly labeled to ensure employee compliance. Culture will also utilize educational signs and periodic training to ensure all waste is responsibly managed.

## **WASTE DISPOSAL LOCATIONS**

Culture will engage a Santee licensed waste hauler for non-cannabis waste. Non-cannabis waste will be stored in the on-site trash enclosure nearest to Culture's facility. Non-cannabis waste will be moved to this enclosure at the end of each day. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

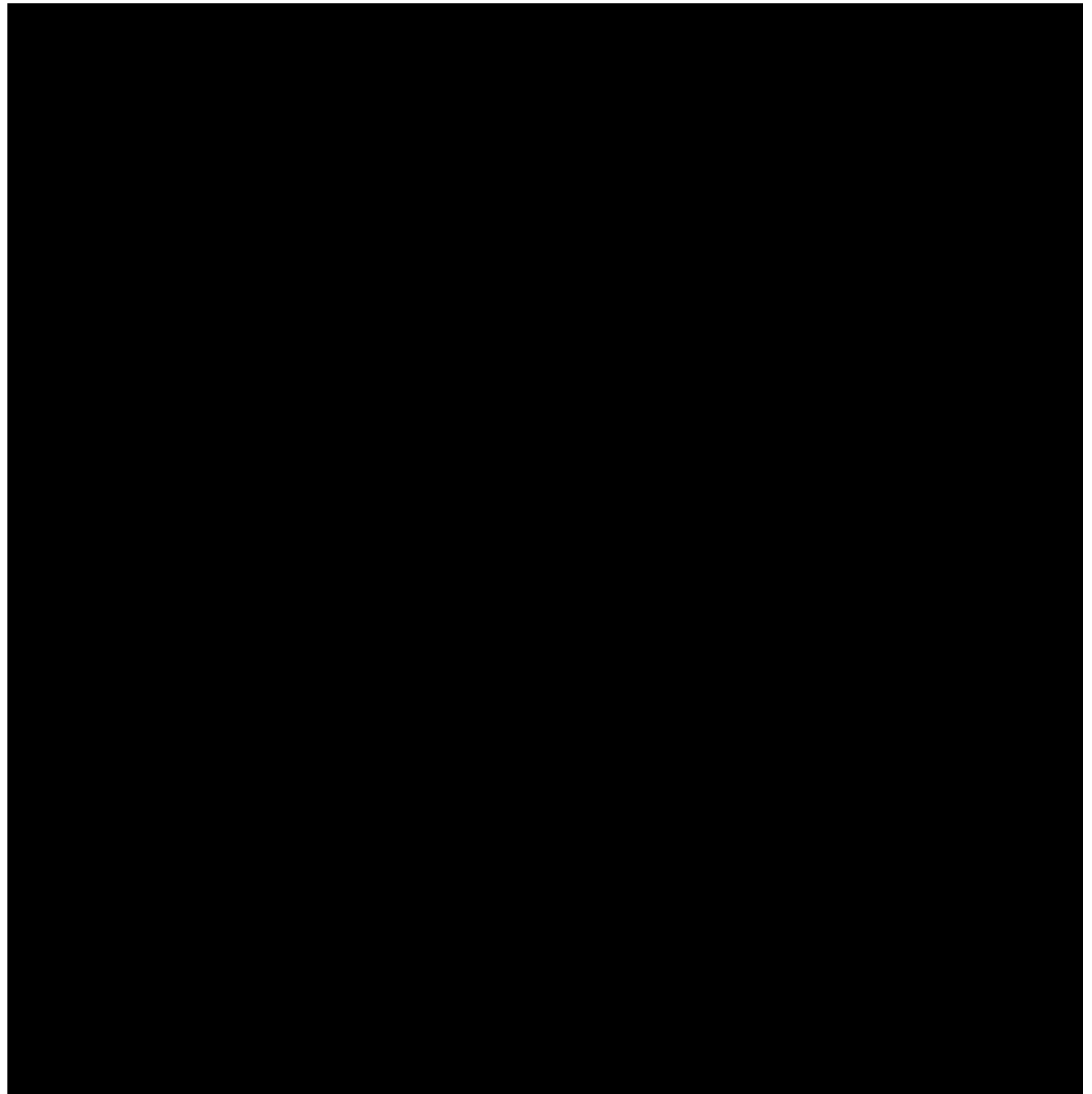
[REDACTED]



be locked inside the facility secure storage room, in a clearly labeled area segregated from cannabis goods for retail sale.

[REDACTED] The waste storage receptacles will have the following features:

- Constructed to be easily handled for collection
- Constructed of rust-resistant and corrosion-resistant materials
- Equipped with a locking tight-fit lid or cover



## **CANNABIS WASTE STORAGE AREA**

Culture will ensure that waste storage poses no risk of fire or harmful vapors and will not mix cannabis waste with hazardous materials. All waste storage areas will undergo daily inspections, with routine cleaning to check for pests. Any pest discoveries will prompt immediate action with a licensed California exterminator. Regardless of inspection results, we will sanitize all waste storage areas weekly.

### **CLEAR BAGS**

Culture utilizes clear garbage bags for all waste throughout the store. Clear bags will allow all waste to be inspected. Clear bags prevent attempted diversion of product from the sales floor via garbage bins by allowing for visual inspection of all sales floor waste. Further, if someone does succeed in breaking into the dumpster holding non-cannabis waste, they may cease their criminal attempt once they see through the clear bags that they do not contain cannabis.

## **METHODS OF RENDERING WASTE UNUSABLE AND UNRECOGNIZABLE CANNABIS DESTRUCTION POLICIES**

If any of Culture's cannabis items become contaminated, recalled, expired, or otherwise rendered unusable, Culture will dispose of them in accordance with the policies, procedures, and regulations described in this section. Culture's inventory manager will always be present and oversee any destruction of product and ensure that it is properly recorded in METRC via Culture's track-and-trace software, Dutchie. All records related to cannabis waste destruction and removal will be saved for no less than seven years. Additionally, Culture asserts that cannabis waste will never be sold for any reason.

### **COMPOSTING GRINDER**

Culture will use a composting grinder, also known as a compost shredder or food cyclor, to render cannabis unusable and unrecognizable. This product is a small appliance that chops up compostable items into an odor-free container. It is capable of shredding plant-based items, including cannabis. The shredding speeds up the decomposition of cannabis waste while mixing it with compostable non-cannabis materials added by the machine's operator to dilute the final cannabis waste mixture. Culture uses Waring Commercial Grinder as can be seen in the picture.



The Culture team has prepared the following processes to render waste unusable. [REDACTED]

[REDACTED] Depending on whether or not the cannabis goods and added non-cannabis component are compostable, either of the following processes will be followed. The inventory manager will sanitize all equipment used once the process is complete.

## **SECTION B : LABOR & EMPLOYMENT PLAN**

### **1. NUMBER OF EMPLOYEES**

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#### **INITIAL OPENING**

Culture is planning to hire around 25 employees for its retail store and delivery operations, excluding owners and security personnel. The focus will be on hiring a majority of full-time staff, as we believe that consistent presence and benefits foster commitment and productivity. However, part-time employees will also be essential for managing peak sales periods, whether daily, seasonally, or during promotions. For the initial opening, Culture aims to hire 15 staff members. This strategy balances stability with flexibility, ensuring we can meet customer demand effectively.

#### **FULL CAPACITY**

At full capacity, Culture anticipates employing 25 staff members. This number will include a majority of full-time employees to ensure commitment and productivity, while still incorporating part-time staff to cover peak periods and promotional events. This balanced approach will help us effectively meet customer needs and maintain a strong community presence.

### **2. EMPLOYEE RESPONSIBILITIES**

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#### **POSITIONS**

Culture plans to fill a variety of positions as we grow, with a focus on cross-training and promoting from within whenever possible. Potential roles include:

- General Manager (Management)
- Assistant Manager
- “Cannabis Consultant” (Sales Associate)
- Receptionist
- Inventory-Quality Control Manager
- Delivery Drivers

Additionally, we will contract third-party security personnel, ensuring that at least one physical security guard is present on-site during store operating hours to maintain safety and security for both staff and customers. This approach will help create a cohesive team dedicated to the success of Culture.

#### **RESPONSIBILITIES**

##### **General Manager (GM)**

- Oversees all operations and day-to-day decision-making
- Manages staffing, product selection, and security oversight
- Handles cash management, reports, audits, and inventory audits for non-diversion
- Liaises with ownership on daily goals, issues, and business decisions

**Assistant Manager (AM)**

- Assists the GM with daily operations
- Ensures an AM is present whenever the GM is not on-site
- Supports oversight of operations, staffing, product selection, and security
- Aids in cash management, reports, audits, and inventory audits for non-diversion
- Communicates with ownership on daily goals and business matters

**Sales Associate (Cannabis Consultant/Floor Manager)**

- Manages all sales associates and oversees cash and product reconciliation on the sales floor
- May also serve as an AM depending on team size

**Sales Associate (Cannabis Consultant)**

- Handles sales floor procedures and direct sales to customers
- Educates customers and is cross-trained as a Delivery Driver

**Receptionist**

- Manages employee check-in and verifies identification
- Oversees patient/customer file management

**Inventory Controller/Quality Control**

- Manages product deliveries, storage, and inventory audits
- Possesses expertise in Culture's inventory management and POS system (Dutchie), integrated with METRC
- Tracks sales performance and curates product selection based on forecasts and market trends
- Ensures quality assurance and control procedures are followed
- The QA manager is knowledgeable in Dutchie management and inventory reconciliation

**Security**

- Provided by a contracted security firm, with guards working in shifts
- Responsible for patrolling, checking IDs, and surveillance monitoring
- All personnel are BSIS licensed

**Delivery Driver**

- Delivers products using company-issued or approved personal vehicles
- Ensures deliveries are made to verified customers at legal locations
- Cross-trained as a sales associate



## SALARY RANGES

Culture is committed to fostering growth and prosperity in every community it serves. By providing its employees with strong foundational support and financial stability, Culture aims to uplift its team and share in its successes. This core aspect of our company ethos will enable us to be a significant source of job generation for the city, offering employees living wages and benefits that surpass typical industry standards.

WAGE CHART		SANTEE, CA			
Employee Types	Number of Owners / Employees	Average Hourly Pay	Estimated Hrs./Week (per person)	Estimated Pay/Month (Total)	
Third Party Security Guards	2	\$ 24.00	35	\$ 7,280.00	
Management	1	\$ 33.00	35	\$ 5,005.00	
Assistant Managers	2	\$ 28.00	35	\$ 8,493.33	
Sales Associates Full Time	10	\$ 18.00	35	\$ 27,300.00	
Sales Associates Part Time	4	\$ 18.00	15	\$ 4,680.00	
Receptionists Full Time	2	\$ 18.00	35	\$ 5,460.00	
Receptionist Part Time	1	\$ 18.00	15	\$ 1,170.00	
Inventory-Quality Control	1	\$ 19.00	35	\$ 2,881.67	
Delivery Drivers	2	\$ 18.00	35	\$ 5,460.00	
<b>Total Salaries and Wages</b>	<b>25</b>	<b>\$ 233.00</b>	<b>275</b>	<b>\$ 67,730.00</b>	

## 3. EMPLOYEE BENEFITS

### SUMMARY

Culture prioritizes positive employee relations, fostering a thriving workplace where team members feel engaged and vital to the company's success. We emphasize transparent communication through regular team meetings and feedback sessions, promoting trust and collaboration. Committed to fair employment practices, Culture maintains clear policies on conduct, expectations, and benefits to ensure equity among staff. We invest in professional development by offering training programs and Continuing Education Grants of up to \$5,000 annually for accredited courses, including coverage for cannabis-related courses. This dedication to open communication, fair policies, and ongoing learning shapes Culture's approach to employee relations.

Culture's compensation is above industry standards, with entry-level wages that are \$2.00 higher than minimum wage and senior level wages are competitive to comparable industries. Additional benefits include:

- Annual raises and bonuses
- Tuition reimbursement
- Employee discounts
- Paid time off
- Generous vacation time

We prioritize work-life balance with paid leave benefits that comply with State and Federal medical leave laws. Full-time employees accrue annual paid vacation time, while hourly and salaried staff enjoy increasing allowances based on their years of service.

401k	Health/Dental/Eye Insurance
Entry level wages are \$2.00 higher than minimum wage	Senior level wages are competitive to comparable industries
Annual Raises and Bonuses	Tuition Reimbursement Program
Employee Discounts	Paid/Sick Time Off
Vacation Time Accrual	Maternity Leave
Day Care Assistance	Paid Volunteer Hours
Bereavement Days	

## HEALTH CARE

Culture is deeply committed to the well-being of its employees, recognizing that a robust benefits package is essential for fostering a healthy, productive workforce. Our healthcare coverage is provided through Blue Shield of California's Trio HMO Plan, which not only offers a wide range of medical services but also includes a 50% premium contribution from the company. This substantial support ensures that employees have access to quality healthcare without facing overwhelming out-of-pocket costs.



In addition to our healthcare offerings, we prioritize financial wellness through our 401(k)-retirement plan, managed by Fidelity. This plan features a 3% matching contribution from Culture, encouraging employees to save for their future and providing an additional layer of financial security. We also offer financial wellness workshops to educate employees on effective saving strategies and investment options, empowering them to make informed decisions about their financial health.

Furthermore, our benefits package extends beyond basic health coverage and retirement plans. We provide access to mental health resources, including counseling and therapy services, ensuring that employees have the support they need for their emotional well-being. Additionally, we offer flexible spending accounts (FSAs) for medical expenses, allowing employees to set aside pre-tax dollars for qualified health expenditures.

Culture also understands the importance of work-life balance, so we provide generous paid time off (PTO) policies, including vacation days, sick leave, and personal days, which encourage employees to recharge and maintain their overall health. By integrating these comprehensive benefits into our employee offerings, Culture aims to create a supportive environment that fosters both physical and mental well-being, ultimately enhancing job satisfaction and productivity.

## VACATION AND MEDICAL LEAVE POLICIES

Embodying a foundational ethos of fostering growth and prosperity, Culture serves as a beacon of financial stability and support for its employees. Committed to uplifting its workforce, the company significantly contributes to job creation within the local community, ensuring that employees receive wages and benefits that exceed industry standards.

Recognizing the importance of providing living wages, Culture sets a minimum starting salary of \$18 per hour, a substantial increase over the State's minimum wage of \$16 per hour. This commitment continues as the company expands, with an annual increase of approximately 3-4% in the minimum starting rate.

## PAID TIME OFF (PTO) POLICY

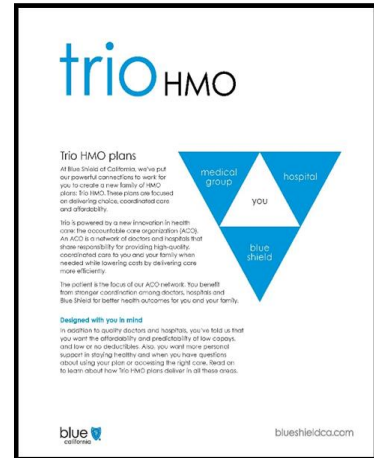
In alignment with its belief in the well-being of employees, Company provides full-time employees with paid vacation time, fostering a culture of rest and rejuvenation. While part-time and on-call employees are not eligible for paid vacation, eligible employees can accrue PTO after 90 days of employment. The company encourages the use of PTO time annually, allowing rollover if unused. Requests for PTO should be submitted in writing, approved in advance by the manager based on business conditions, and unauthorized requests are not valid until signed and approved by management. Upon separation from Company, employees receive payment for any earned and unused PTO. The versatile use of PTO for personal/sick days, following proper procedures, ensures employee well-being.



Requests for PTO should be submitted in writing, approved in advance by the manager based on business conditions, and unauthorized requests are not valid until signed and approved by management. Upon separation from Company, employees receive payment for any earned and unused PTO. The versatile use of PTO for personal/sick days, following proper procedures, ensures employee well-being.

## VACATION ACCRUAL FOR HOURLY AND SALARIED EMPLOYEES

Company values the dedication of its employees and recognizes their service through a structured vacation accrual system. Hourly employees earn 5, 10, or 15 vacation days based on their length of service, while salaried employees enjoy increments from 5 to 20 vacation days, celebrating their commitment and loyalty to the company. The comprehensive compensation and benefits package,



including competitive wages and an inclusive vacation policy, underscores Company's commitment to creating a supportive and rewarding workplace for its valued team members.

***HOURLY EMPLOYEE***

Length of Service	Vacation Available
1 – 2-year anniversary	5 days
2 – 5-year anniversary	10 days
5+ year anniversary	15 days

***SALARIED EMPLOYEE***

Length of Service	Vacation Available
1 – 2-year anniversary	5 days
2 – 5-year anniversary	10 days
5 –7-year anniversary	15 days
7+ year anniversary	20 days





## SECTION C : SECURITY PLAN

### 1. QUALIFIED SECURITY PROFESSIONAL

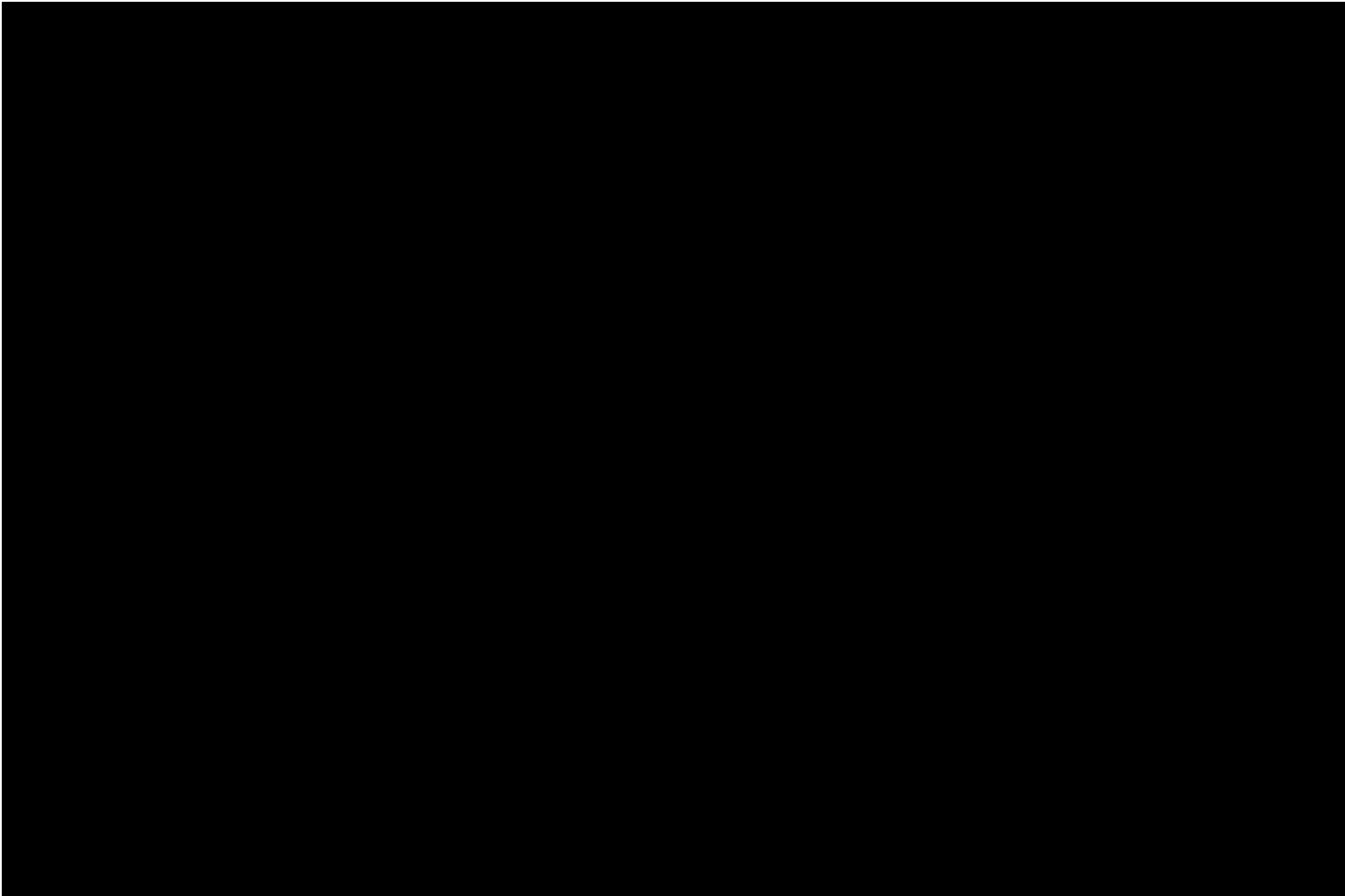
Culture has contracted with **Sapphire Risk Advisory Group, LLC** (“Sapphire”) (B07328001 Security Consultant, Texas) to prepare this security plan, as well as assist in designing and implementing its security program and strategy. Sapphire has extensive expertise in implementing loss-prevention controls and processes that mitigate security threats from armed robbery and burglary specific to the cannabis industry. Sapphire has designed security operations for over 800 cannabis businesses in 37 states, including over 175 in California. Culture will ensure complete compliance with the Application Procedure Guidelines for a Cannabis Business Permit (“Guidelines”), the Santee Municipal Code (“SMC”), as well as the California Code of Regulations, Title 14 (“4 CCR”), issued by the Department of Cannabis Control (“DCC”).

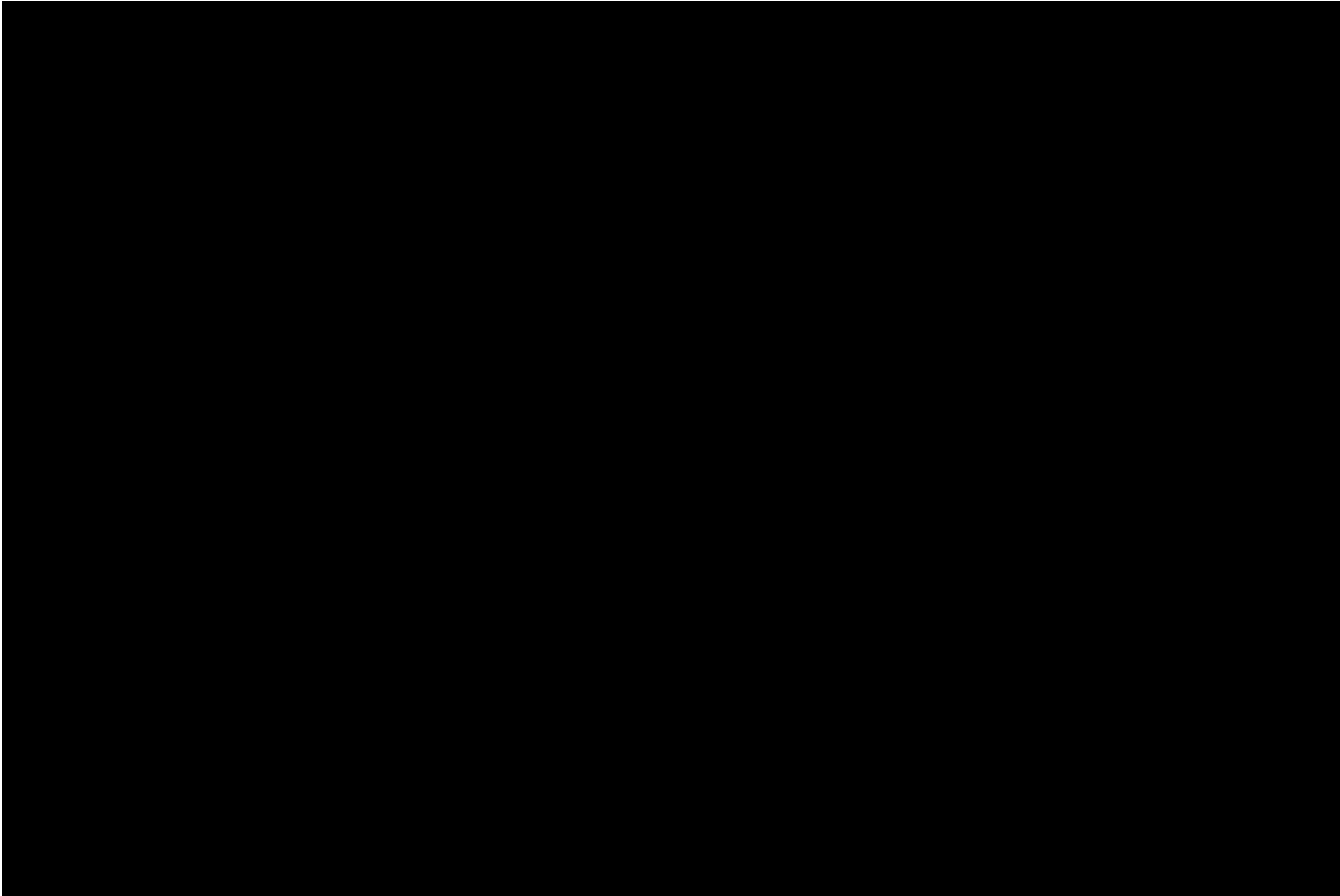


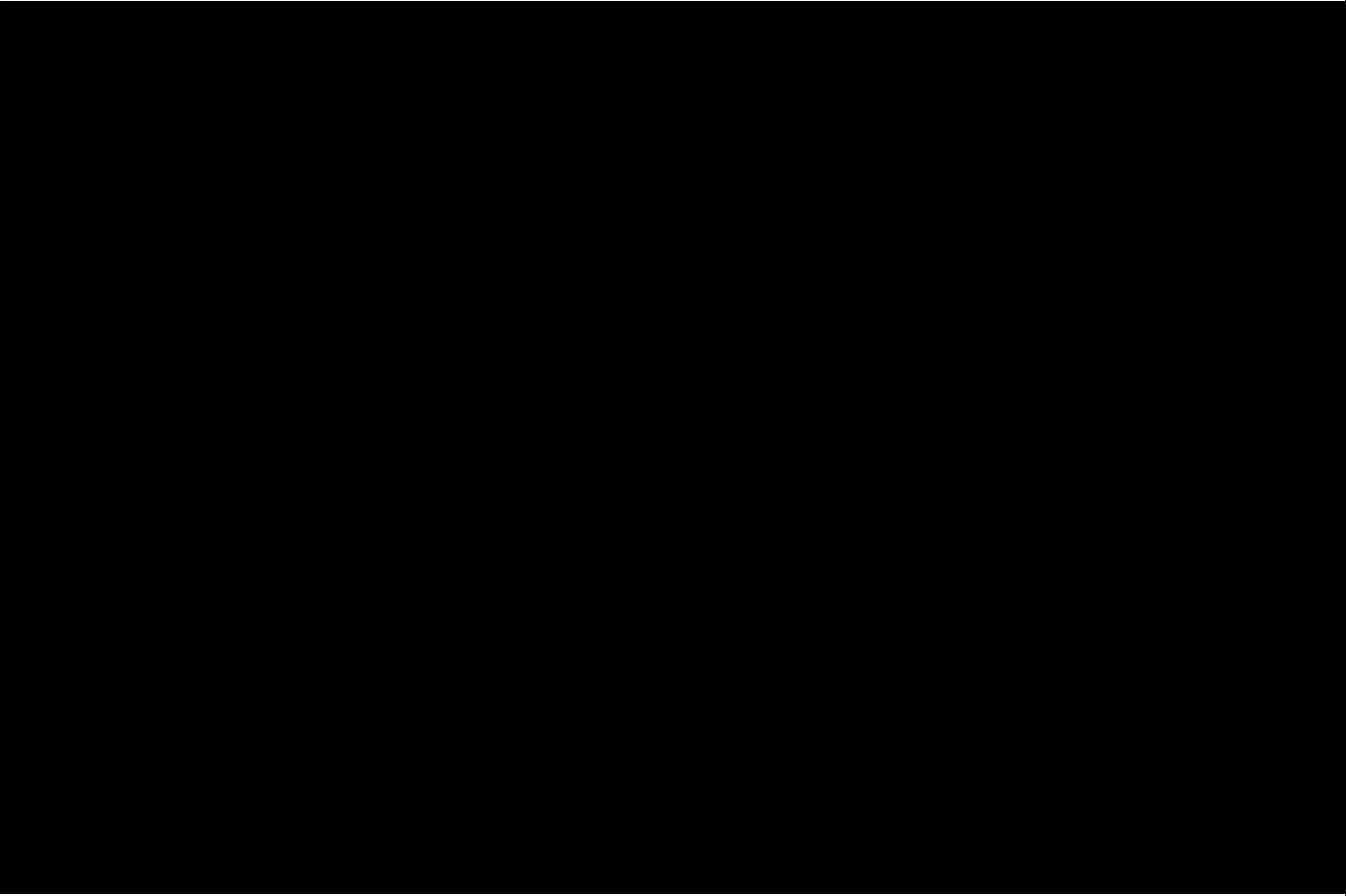
### 2. PREMISE DIAGRAM

The premise diagram with security overlay from licensed security consultant Sapphire Risk Advisory Group outlines all of the following features:

<b>DCC PREMISE DIAGRAM STANDARDS</b>	The diagram has all rooms labelled per their use, included limited and restricted access areas. All cameras are numbered, the storage room is evident, as well as areas for waste, cash, and record storage. The ingress and egress is notated, and the floor plan indicates the areas where the customer is permitted to be. Additionally, Culture has included a premise diagram which shows all of the Facility boundaries and neighboring structures.	✓
<b>BOUNDARIES, DIMENSIONS, INGRESS/EGRESS, WALLS &amp; PARTITIONS, LABELED WITH DESCRIPTION OF ACTIVITY</b>	Culture has included a premise diagram which shows all of the Facility boundaries and neighboring structures. Dimensions, ingress/egress, walls, driveways, and parking are labelled.	✓
<b>IDENTIFICATION OF COMMERCIAL CANNABIS ACTIVITIES AND LIMITED ACCESS AREAS</b>	The commercial cannabis activity areas and limited access areas are color coded in the diagram.	✓
<b>NUMBERED CAMERA LOCATIONS</b>	There are 36 cameras placed around the Facility exterior and interior, labeled and indicated by a camera symbol.	✓
<b>SITE PLAN IDENTIFYING ALL USES ON SITE</b>	The site plan is seen below.	✓









### 3. OPERATIONAL SECURITY

#### ACCESS AND VISITOR CONTROL

##### FACILITY ACCESS PROTOCOLS

Culture will implement sufficient security measures to deter and prevent the unauthorized entrance into areas containing cannabis or cannabis products and to deter and prevent the theft of cannabis or cannabis products. Culture will have a professionally installed keycard-based access control system which restricts access in the store.

##### COMMERCIAL DOORS, WINDOWS, AND LOCKS

Culture will be securely locked and protected from unauthorized entry at all times and will be alarmed and secured against entrance or breakage. Only designated employees will have the ability to unlock a secured area to perform required job duties during hours of operation. Commercial grade, non-residential metal doors and Grade 1 ANSI-rated will be installed on every door and access control entry point. Culture will use electric strike locks, which are less susceptible to damage and utilize electric pulses to indicate that a door should open. Exterior doors will remain locked at all times when not being utilized and will be rated for 60 minutes forced entry resistance. Exterior locks will be shielded with metal plates to prevent manipulation from the outside. Culture will have the capability to remain secure during a power outage; all access doors will not be solely controlled by an electronic access panel to ensure that locks are not released during a power outage. Panic buttons will be strategically placed throughout the Facility.



##### LIMITED ACCESS AREAS

Culture will establish limited access areas accessible only to authorized personnel. Secure areas like the vault will have a two-factor authentication key card and PIN access system. Only those employees needing access to particular areas of the retailer will be given the necessary authorization. Any lost or stolen key cards will be reported immediately so that card access may be suspended. All employees will also wear an identification badge issued by the company



containing, at a minimum, include the company's name and license number, the employee's first name, their employee number, and a color photograph. Only people over 21 are allowed access to the facility, other than those 18-20 years old with proper medical marijuana documentation and accompaniment by a parent, legal guardian, or a primary caregiver. Valid proof of a physician's recommendation and identification is required before entry. Identification will be verified again before purchase of any product or merchandise.

## **VISITOR PROCEDURES**

Culture will maintain a log of all individuals who are not employees who are granted access to the limited access area. These logs will be made available to the City or DCC upon request. Employees will escort visitors throughout the facility and ensure they possess a visitor's badge. A KNOX-BOX Rapid Entry System safe box will be wall-mounted outside the entrance and hold building keys for first responders to retrieve in emergencies.

## **INVENTORY CONTROL**

### **TRACKING CANNABIS INVENTORY**

Culture will maintain an inventory control and reporting system that accurately documents all cannabis and cannabis products for processes until purchase as set forth in MAUCRSA. Culture will conduct an initial, monthly, and annual comprehensive inventory of all cannabis in the possession and will include damaged, defective, expired, or adulterated cannabis awaiting disposal. Culture will maintain the results of all inventory reconciliations and make the results available to the City and DCC.

Culture will have an accounting software system in place to provide point-of-sale data as well as audit trails for both product and cash, where applicable. Two employees will independently perform inventory reconciliations. All inventory product weights will be performed using the same commercial scale. All scales will be inspected and approved by the Department of Weights and Measures. Results will be logged and reconciled upon completions.

Culture will perform an inventory reconciliation of all cannabis and cannabis products at least once every 30 days. Culture will notify the City within 24 hours after discovering any loss or breach of security. Any problems or concerns will be brought to the General Manager, who will take all appropriate steps including contacting the appropriate authorities if there is suspected criminal activity. Results will be maintained and provided to the City or the DCC upon request.

### **CANNABIS STORAGE**

[REDACTED]

[REDACTED]

l.

## VIDEO SURVEILLANCE SYSTEM AND ALARM SYSTEM INTEGRATION

Continuous 24/7 video surveillance, using commercial-grade equipment, such as those by **Hanwha Vision**, will monitor all points of entry and exit, areas where any cannabis or cash is stored or handled, and any other areas where theft or diversion could reasonably occur. Direct line-of-sight cameras will be installed at a height to provide a clear image of all individuals and activities in and around the premises from at least 20 feet away, and will be able to clearly capture details such as ID badges, facial features and license plates. Video will be of at least high-definition (HD) quality, will record in color, and will have the capability to automatically switch to black and white in low light conditions. Outdoor cameras will protect against vandalism or tampering and be IP66-rated to withstand rain and dust. Cameras will be supported by lighting and have the ability to immediately produce a clear, color still photo that is a minimum of 9600 dpi, live or recorded to produce in the event of a legal proceeding. A date and time stamp on all recordings will be synchronized with NIST, set correctly, and will not significantly obscure the picture.



The video surveillance system will be monitored and installed by monitoring company such as **Netwatch North America** (ACO 8049) during non-operational hours. Remote viewing will be available via a multi-channel Internet Protocol Network Video Recorder, utilizing advanced video coding codec technology and infrared capabilities. Culture will use dome cameras that record at least 2 Megapixel resolution and 15

frames per second. Per SMC §7.04.320(A)(5), video recordings will be maintained for a minimum of 120 days, exceeding the 90-day requirement of 4 CCR §15044(h), and will be made available to the City upon request. Video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees no alteration has taken place. Culture will limit access to surveillance areas through a locked door, with at least one camera recording the access points to the secured surveillance recording area. Video analytics will enable monitoring personnel to identify suspicious circumstances.

Culture will have a professionally installed, maintained, and monitored real-time alarm system by a UL-licensed security company. The system will be a combination of sirens, passive-infrared motion sensors, fire and smoke detectors, glass break detectors, door contacts, mosquitos (high pitched frequency devices), and panic buttons to ensure the premises has complete coverage. All devices will be in accordance with industry standards, have an auxiliary source of power, and be capable of sending an alarm signal to management, local officials, and monitoring entity when breached. All keypads will be equipped with a silent signal, or “duress code”, indicating to the monitoring entity that the user is being forced to turn off the alarm system. Access to the alarm system will be restricted and will be activated whenever the facility is closed. Alarm systems will

be maintained in good working condition and data will be provided to regulators within 24 hours of the request. Culture will install a failure notification system of any failure in the surveillance system, alerting management within five minutes. The video surveillance and alarm systems will be equipped with an uninterruptible power supply synchronized with a generator to provide a seamless transition from main power to auxiliary power in the event of a power outage.



## **DELIVERY**

Culture will have a storage and transportation plan, which describes in detail the procedures for safely and securely storing and transporting all cannabis, cannabis products, any hazardous materials that may be used by the business, and any currency. Training will emphasize safety and protecting life over things that can be replaced. Drivers will be trained for all feasible situations, including customer interactions, emergency communication, vehicle accidents, breakdowns, law enforcement encounters, theft, and attempted theft, and identifying alternative routes. The driver must maintain a log that includes all stops on the route and the reason for each stop. Culture will provide information of all vehicles that will be used to deliver cannabis or cannabis products and will update any changes in writing within 30 calendar days. The transportation vehicles will include an integrated camera system, global positioning system (GPS), secure locker area, climate controlled function, and alarm system. Vehicles, such as the Ford Transit or Mercedes-Benz Metris, will have no markings or other indication that it is being used to transport cannabis.

Delivery orders will be prepared in a limited access area. Each delivery driver will not leave until they have a delivery inventory ledger of all cannabis goods received. Employees will verify the age and the necessary documentation of each customer. They must ensure that medical customers are at least 18 years of age and verify that the customer has a valid doctor's recommendation or must verify that the customer is at least 21 years of age. After each delivery, the inventory ledger will be updated to reflect the current inventory in the vehicle.

## **RECORDKEEPING**

Culture will maintain accurate books and records in an electronic format, detailing the revenues and expenses of the business and all of its assets and liabilities. Culture will implement UL-2900 network security protocols that are certified by Underwriters Laboratories. All physical documents required under 4 CCR §15037 will have safeguards against unauthorized erasures and changes in data and will be compliant with all state and federal document storage and confidentiality rules. On an annual basis, financial audit will be submitted to the City of the business's operations conducted by an independent certified public accountant. Culture will be subject to a regulatory compliance review and a gross receipts financial audit, where applicable, as determined by the City. All records collected, with the exception of surveillance records, will be maintained for a minimum of seven years. Culture will cooperate whenever the City makes a request, with or without prior notice, to inspect or audit any security plan or other requirement. No person will refuse, impede, obstruct, or interfere with a lawful inspection.



## 4. CASH HANDLING

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### PROCEDURES

Sapphire will train each cashier in efficient and safe cash management techniques. All employees will be held accountable for the balance of their drawers. If an employee does not balance accurately within one percent (1%) on three occasions, that employee may be terminated or removed from any position involving the handling of funds. All cash transactions and counting will be conducted within full view of a security camera.

### TRACKING CASH

Every transaction will be recorded by the inventory track-and-trace system that provides Culture with sales records. Cash will be monitored to guard against counterfeiting, fraud, miscounting, errors, and other employee theft and diversion practices. Management will conduct unscheduled audits of to ensure best cash management practices.



### STORING CASH

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] All cash deposits will be logged with an accurate count and signature of management.

### TRANSPORTING CASH

Culture will contract with a third-party security company that utilizes secured transportation to transport cash deposits from the retailer to its bank. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## 5. PERIMETER SECURITY

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### OVERVIEW

Culture will maintain the premises in a clean and safe condition so that it is not dangerous to the health, safety, and general welfare of employees, customers, vendors, and neighbors. Employees will: remove all trash, debris, and graffiti within 24 hours of its occurrence; keep pathways on and adjacent to the property clean and clear; and provide lighting on the exterior premises and parking lot to ensure the safety of the public and retail personnel. Security guards will ensure no cannabis is visible from the exterior of the premises and no consumption of alcohol, tobacco, nor cannabis is permitted.

## LIGHTING

Culture will keep the outside perimeter well lit. Motion-activated lighting will be installed at all entry points, in low-light interior areas, and everywhere exterior cameras are located in an overlapping fashion in case of bulb failure. A protective lighting design, at a minimum of 500 lux output, will increase video picture clarity, ensure proper surveillance during hours of darkness, and exceed standards set by the Illuminating Engineering Society. All lighting will be deflected away from adjacent properties and directed towards facility premises.

## SECURITY GUARDS



Security personnel will be on site during operating hours and will have a verified response security patrol when closed. Security personnel, such as those from **Resolute Security Group** (PPO 16592), must be licensed by the State of California Bureau of Security and Investigative Services and will be at least 21 years of age. Guards are subject to prior review and approval by the Police. Uniformed licensed security personnel will ensure the safety of personnel by discouraging loitering, suspicious activity, criminal behavior, public nuisance, and the theft and diversion of cannabis. De-escalation techniques will be encouraged before law enforcement is called in for assistance.

## EMERGENCY CONTACT MANAGER

Culture will identify a designated security representative/liaison to the City, who will be reasonably available to meet with the City Manager regarding any security related measures or operational issues at any hour of the day.

## YOUTH DETERRENCE PLAN

Culture is committed to implementing a robust Youth Deterrence Plan, employing various practices to prohibit youth from accessing cannabis, not limited to: strict age verification protocols; prominent signage; security measures; parental education initiatives; anonymous reporting system; and regular staff training.

## 6. EMPLOYEE TRAINING AND POLICIES

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### SUMMARY

Culture offers a comprehensive cannabis education and operations training program that all employees must complete before interacting independently with customers or patients. This 4-week program includes:

- Classroom learning
- Printed reference materials
- Situational role-playing
- On-the-job training with experienced employees

The training covers essential topics for purchaser education, ensuring employees are well-informed and compliant with laws while providing accurate and current knowledge to customers. Employees learn how to make suggestions to medical cannabis patients without prescribing, recommending, or treating specific illnesses or diagnoses.

Culture establishes minimum training standards for all employees aged 21 and older. Training occurs within 30 days of hiring and is repeated annually. It covers established health and safety laws, including OSHA standards, responses to natural disasters, medical emergencies, and unauthorized intrusions. The City may require additional training if deficiencies in City or state requirements are identified. All emergency access, supplies, and evacuation plans will adhere to State and local fire safety standards. Training may include online programs such as mysapphiretraining.com or oaksterdamuniversity.com.

### **BACKGROUND CHECKS**

Culture will conduct background checks on prospective individuals before employment. A current register of the names and the contact information will be maintained of all the officers, managers, employees, agents, and volunteers. The register will be provided to the City upon a reasonable request. If a person is no longer employed, management will remove access and permissions to the facility.

### **CANNABIS COMPLIANCE TRAINING PROGRAM**

**Curriculum:** Cover state and local regulations governing cannabis sales, including age restrictions, purchase limits, and packaging requirements.

**Frequency:** Initial training for all employees and periodic refreshers as regulations evolve.

**Certifications:** Completion certificates indicating understanding and compliance with cannabis laws.

#### **PRODUCT KNOWLEDGE TRAINING**

**Curriculum:** Provide in-depth training on the various cannabis products, including strains, dosage, consumption methods, and potential effects.

**Frequency:** Ongoing as new products are introduced.

**Certifications:** Certificates showcasing a comprehensive understanding of available products

#### **CUSTOMER SERVICE AND COMMUNICATION SKILLS**

**Curriculum:** Focus on effective communication, handling customer inquiries, and addressing concerns professionally.

**Frequency:** Regularly, with ongoing coaching and feedback.

**Certifications:** Certificates recognizing proficiency in customer service.



### **SECURITY AND SAFETY TRAINING**

**Curriculum:** The training program will comprehensively cover a range of essential topics aimed at ensuring a safe and secure environment. Participants will learn about various security protocols tailored to the specific needs of the organization, including access control measures, identification verification processes, and incident reporting procedures. Emergency procedures will be a key focus, equipping trainees with the knowledge to respond effectively in crisis situations, such as fire, natural disasters, or medical emergencies. Additionally, the curriculum will include training on safety measures designed to prevent theft, accidents, and other incidents, encompassing best practices for maintaining a secure workplace and recognizing potential threats. Practical exercises and scenario-based training will enhance understanding and retention of these critical concepts.

**Frequency:** Training sessions will be conducted regularly to ensure that all employees stay informed about the latest security protocols and safety measures. New hires will undergo initial training upon onboarding, followed by refresher courses scheduled at least annually to reinforce knowledge and address any updates in policies or procedures. Additional sessions may be organized in response to emerging threats or changes in the organizational environment, ensuring that staff remain vigilant and prepared.

**Certifications:** Upon successful completion of the security and safety training modules, participants will receive certificates acknowledging their achievement. These certifications will serve not only as a testament to their commitment to safety and security but also as an essential component of their professional development. Maintaining a valid certification will be a requirement for certain roles within the organization, encouraging ongoing learning and adherence to best practices in security and safety protocols. Regular assessments and evaluations will ensure that knowledge is effectively applied, fostering a culture of safety and preparedness within the workplace.

### **CASH HANDLING AND POINT-OF-SALE SYSTEMS**

**Curriculum:** Provide training on secure cash handling, use of point-of-sale systems, and adherence to financial regulations.

**Frequency:** Initial training and periodic refreshers.

**Certifications:** Certificates indicating proficiency in cash handling and POS systems.

### **INVENTORY MANAGEMENT AND COMPLIANCE**

**Curriculum:** Train employees on proper inventory tracking, record-keeping, and compliance with seed-to-sale tracking systems.

**Frequency:** Ongoing, especially when there are updates to inventory regulations.

**Certifications:** Certificates for mastering inventory management and compliance procedures.

### **RESPONSIBLE CANNABIS USE TRAINING**

**Curriculum:** Educate employees on responsible cannabis use, including health effects, potential risks, and harm reduction strategies.

**Frequency:** Periodic updates and as needed.



**Certifications:** Certificates demonstrating knowledge of responsible cannabis use.

### **HEALTH AND SANITATION PRACTICES**

**Curriculum:** Cover hygiene practices, sanitation protocols, and measures to ensure a clean retail environment.

**Frequency:** Regularly, with refresher courses.

**Certifications:** Certificates for completing health and sanitation training.

### **FIRST AID AND CPR TRAINING**

**Curriculum:** Provide basic first aid and CPR training to employees.

**Frequency:** Renew certifications annually.

**Certifications:** Current First Aid and CPR certifications.

### **LEGAL COMPLIANCE FOR ADVERTISING AND MARKETING**

**Curriculum:** Educate employees on laws governing cannabis advertising and marketing.

**Frequency:** Regularly, especially when there are changes in regulations.

**Certifications:** Certificates for understanding and complying with advertising and marketing laws.

### **CONFLICT RESOLUTION AND DE-ESCALATION TRAINING**

**Curriculum:** Equip employees with skills to handle conflicts and de-escalate situations effectively.

**Frequency:** Regularly, with ongoing reinforcement.

**Certifications:** Certificates for completing conflict resolution and de-escalation training.

## **DIVERSION, THEFT, AND LOSS AWARENESS**

All employees will be trained to identify and report signs of theft and diversion. Culture will strive to create a “Culture of Honesty” with an open communication policy. It is the responsibility of all employees to report dishonest behavior or theft-related issues. A third-party employee hotline will also give employees an opportunity to report thefts or violations or provide information anonymously, without fear of retribution.

## **OPENING/CLOSING PROCEDURES**

Secure opening and closing procedures will require two employees to be present. One employee will maintain distance in their running vehicle as the other opens the facility so that they can call for law enforcement if needed. The same protocols will apply when closing the facility.

## **RESTRICTIONS ON MINORS**

All employees will be trained in laws, policies, and procedures that restrict entrance and sales to minors. No person under 21 years of age is allowed on Culture premises without a valid medical recommendation or proof of qualifying caregiver status. Every entrance to the Culture premises will be clearly and legibly posted with a notice outlining the age restrictions on admittance and

required identifying documents. Each letter of the notice will be at least two inches high and clearly visible. Culture does not employ any person who is not at least twenty-one (21) years of age. All employees will be trained in these policies and how to verify age and patient status at both check-in and the point-of-sale using the Dutchie point of sale system.

### **HANDLING OF PRODUCTS**

All employees will be trained on the unique product equipment and displays used at Culture, as well as how to handle products generally. At Culture, customers will find a retail concept that utilizes touch screen technology to educate customers on product types, uses, brands and other information before placing an order. All employees are trained in the use of this system and how to explain it to new customers. Employees are also trained on Culture's policy of having no manufactured cannabis products on the sales floor, but rather just product packaging, for maximum security.

### **CANNABIS HEALTH & SAFETY**

This topic addresses the responsible use of cannabis, its physical effects, recognizing signs of impairment, and appropriate responses in the event of over consumption. This topic will also train on the laws and regulations about driving while under the influence of cannabis.

### **REGULATORY COMPLIANCE**

This topic trains employees on the State and local regulations that govern cannabis retailers. Staff will become familiar with different departments and agencies, the oversight they provide, how to contact the different agencies in the case of incident or emergency, and the rules set forth by each governing agency or department. Culture staff will all be well versed in the rules of the DCC and will repeatedly be tested on various aspects of compliance throughout their employment with Culture. The training will also cover auditing, inspections, and permitting inspections by state and local licensing and enforcement authorities.

### **LIMITATIONS ON SALE**

This topic will cover all restrictions and limitations of sale, including but not limited to, prohibition of sale to minors and purchasing and possession limits. Employees will also understand how to use their best judgement to deal with company customers and any issues that may arise in the dispensary showroom during a transaction. Staff will know when to enlist the help of a manager, a senior employee, security guards, or local police.

### **INVENTORY TRACKING AND RECORDS MAINTENANCE**

This topic will cover acceptable forms of identification and how to verify customer information, common verification mistakes, and DCC rules about the storage of customer information, privacy issues, and Federal HIPAA laws. It will cover the rules regarding record-keeping and the form and manner in which records are required to be kept. It will cover inventory record-keeping, compliance with inventory tracking system regulations, and use of the Dutchie inventory management and Point-of-Sale system.

## **QUALITY ASSURANCE**

This topic will cover all items related to the safekeeping of products at the dispensary. This includes storage, proper rotation, labeling, and quarantine. Training will cover different product types and how they must be stored for shelf-life. This includes temperature, light, humidity, and other environmental controls. Employees will be well-trained in health and safety standards of the industry, packaging and labeling requirements, how to check products delivered by transporters against manifests, performing quality checks before receipt of goods, and spotting packaging problems, incorrect labelling, and expired products. Recalls and waste handling, management, and disposal will also be thoroughly covered as part of quality assurance training.

## **ADDITIONAL ROLE SPECIFIC TRAINING**

All employees receive additional on-the-job training specific to their roles, whether that be sales, inventory, quality assurance, security, or a combination of one or more. Role-specific training is developed and led by the manager for the applicable department. After completing and passing a knowledge assessment for “train the trainer” training, supervisors may also lead role-specific training.

## **FACILITY MAINTENANCE**

All employees will be trained on how to audit and maintain the facility for issues. This includes the HVAC system, fire sprinklers, security cameras, fire and burglar alarm systems, and overall facility cleanliness and upkeep. While Culture doesn’t expect its staff to know how to properly maintain each system, it still instills a mentality of responsibility. If you see a fire alarm light turn on, what does that mean? How many times a month should the HVAC technician come to service the equipment? All staff are aware of what it takes to keep the facility controlled, protected, clean, and safe.

## **STAFF TRAINING PROCEDURES DOCUMENTATION**

In accordance with 4 CCR §15037(3), Culture keeps training records including, but not limited to, the content of the training provided and the names of the employees who received the training, for at least seven years. Training records will also contain dates of completion, employee signatures, and the signature and description of the credentials of any subject matter expert who provided the training.

## **IN-STORE VENDOR TRAINING SESSIONS**

Vendor sessions are important as staff require product and brand knowledge in order to deliver top quality service to customers. While Culture staff never make medical recommendations or prescribe products, it is crucial that they are trained to provide detailed, complete, and accurate information on all cannabis and cannabis flower available so that consumers can make informed choices.



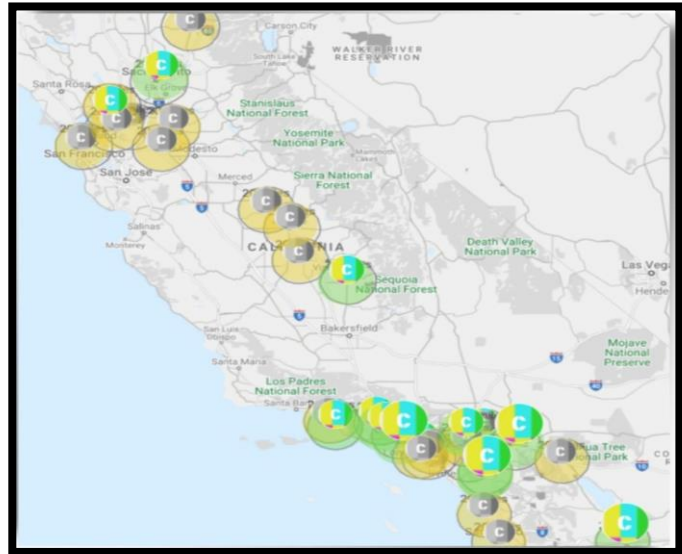


## SECTION D : QUALIFICATION OF OWNERS

### 1. BUSINESS OWNERS' PRIOR EXPERIENCE IN CANNABIS RETAIL

#### CANNABIS BUSINESS EXPERIENCE

The map to the right illustrates our current operations and all licenses that are in various stages of construction or entitlement throughout California. The Culture brand is set to expand nationally, with plans to open two additional stores this year, following the recent openings of two Fresno locations in January 2024. Furthermore, Culture has recently been awarded a license in the city of Monterey, further enhancing our growth prospects.



#### OPERATIONAL EXPERTISE

Throughout the application, Culture showcases years of industry knowledge and experience, free of sanctions or fines. Robust SOP manuals, continuous training, and collaboration with industry experts ensure compliance, with regular audits covering systems, processes, METRC usage, and quality assurance. Culture's operational departments handle diverse aspects, including licensing, legal affairs, finance, marketing, and retail operations, implementing best practices and maintaining high standards.



Culture is proud to boast its owner and Chief Executive Officer, Devon Julian, is a former resident of Santee. Mr. Julian moved to Santee in 1994 and has established deep roots in the community. His parents continue to reside in his childhood home on Cuyamaca Street, while his grandmother lives nearby on El Nopal. Mr. Julian attended Carlton Hills Elementary School and was actively involved with Guardian Angels Catholic Church, participating in CCD, serving as an altar boy, and volunteering for the fall festival. He graduated from West Hills High School in 2005. Mr. Julian's first job was at Village Carpets Flooring America in El Cajon, a family-owned business that has since relocated to proudly serve Santee for the past six years. He is actively engaged with the East County San Diego Regional Chamber of Commerce and the Santee Chamber of Commerce, participating in events such as the annual gala, ribbon cuttings, and monthly coffee gatherings. Additionally, Mr. Julian

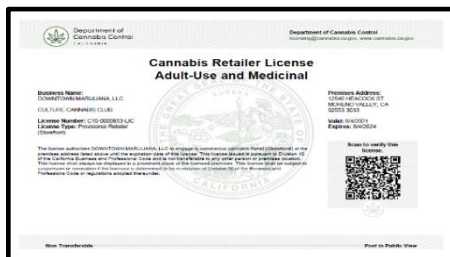
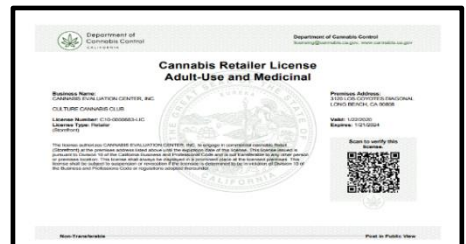
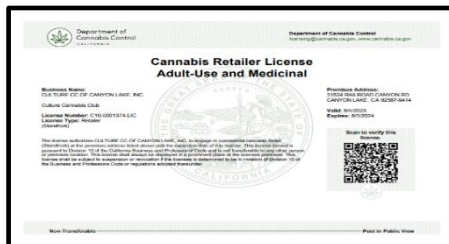
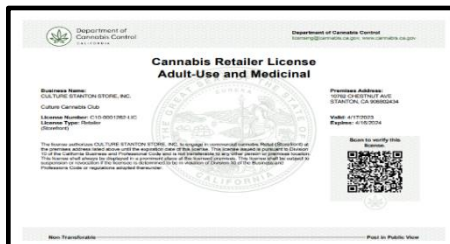
## City of Santee – Commercial Cannabis Retail Application

is committed to giving back to the community, having donated to various charitable causes, including the Veterans Memorial on Mast Boulevard, the Measure S Protect Santee tax initiative, the Made to Change local school pantry program, and the Santee Food Bank. He also enjoys attending community events like the Santee Firefighter pancake breakfast.



## PROOF OF LEGAL CANNABIS OPERATIONS

Owner experience in legally permitted *retail* licenses dates back to 2020, with further experience under Proposition 215 since 2007! To demonstrate our experience in owning, managing and operating legally permitted cannabis retail stores, we have included some visual evidence of valid licenses, and owner information as documented with the Department of Cannabis Control. Due to the space restrictions of the application, the below demonstration is not exhaustive, but serves as a sample of the depth and strength of ownerships experience. Additionally, we have included some





photos of store openings on the previous page, where Culture retails stores were welcomed into new communities with open arms!

### FAMILIARITY WITH LOCAL GOVERNMENT ENTITLEMENT PROCESSES




Culture exhibits a high level of familiarity with local government entitlement processes, as evidenced by its operation of twelve stores and the successful acquisition of numerous licenses for cultivation, microbusinesses, and retail across various California municipalities. The owners of Culture have demonstrated a comprehensive understanding of the intricacies involved in the local permitting process, navigating through each stage from zoning considerations to construction requirements. Owners have showcased expertise in engaging with local government authorities to secure the necessary approvals and ensure compliance with all local ordinances. The success of Culture in obtaining licenses and permits in multiple municipalities underscores the owners' adeptness in navigating the nuanced and often complex local government entitlement processes.



## 2. KNOWLEDGE OF OWNERS & TEAM OF THE CANNABIS INDUSTRY

The Owners of Culture bring over 20 years of extensive experience in the legal cannabis industry, having generated more than \$100 million in revenue from cannabis operations. Currently, Culture operates 10 retail stores, currently 8 are open in California, 1 in Mississippi, and 1 in Ohio. Since opening its first branded store in Long Beach in August 2020, Culture has rapidly expanded, achieving the remarkable milestone of opening a dozen stores in just four years. We plan to open 2 additional stores in 2024, expanding into Northern California. For updates on our growth and customer reviews, please visit our website at [culturecannabisclub.com](https://culturecannabisclub.com)!

**CULTURE**  
S A N T E E / O W N E R S



**DEVON JULIAN**  
Chief Executive Officer  
  
13 Years in Cannabis  
  
**Four Years**  
running Culture  
Retail Stores  
  
Day to Day Oversight

**JULIE LE**  
Director of Administration  
  
6 Years in Cannabis  
  
**Creator of**  
Culture Brand  
  
Day to Day Oversight



Culture recognizes that every community has its own unique culture, desires, needs, and aesthetics. From day one, we aim to align our business mission with the local mission, consistently offering the highest standards while remaining sensitive to the community. As the community grows and infrastructure expands, Culture adapts its approach accordingly.

The building's aesthetic is designed to blend seamlessly with its surroundings, creating a comfortable and familiar environment for local clientele. Products are sourced based on customer requests, and we actively partner with non-cannabis businesses and vendors to support the local economy, leveraging the expertise of our neighbors.

In alignment with our mission, Culture operates in a compliant, safe, and profitable manner, contributing valuable tax revenue that enhances the city and enriches the lives of its residents. Throughout this application, Culture showcases years of industry knowledge, best practices, and a thorough understanding of city and state regulations. Our detailed SOP manuals guide all aspects of daily operations, with a strong emphasis on staff training and quality customer service. We regularly train our management and staff to ensure that all employees are well-informed and up-to-date on regulatory requirements.

## **CULTURE DEPARTMENTS HANDLING ALL DAILY BUSINESS AND OPERATIONS**

Licensing & Regulatory Compliance	Legal Affairs
Government Affairs and Public Policy	Real Estate
New Market Growth & Expansion	Administration & Bookkeeping
Finance Controller	Marketing & Brand Design
Retail Operations	Project Development & Entitlements
Distribution Operations	Product Development
Cultivation Operations	Architect & Interior Design

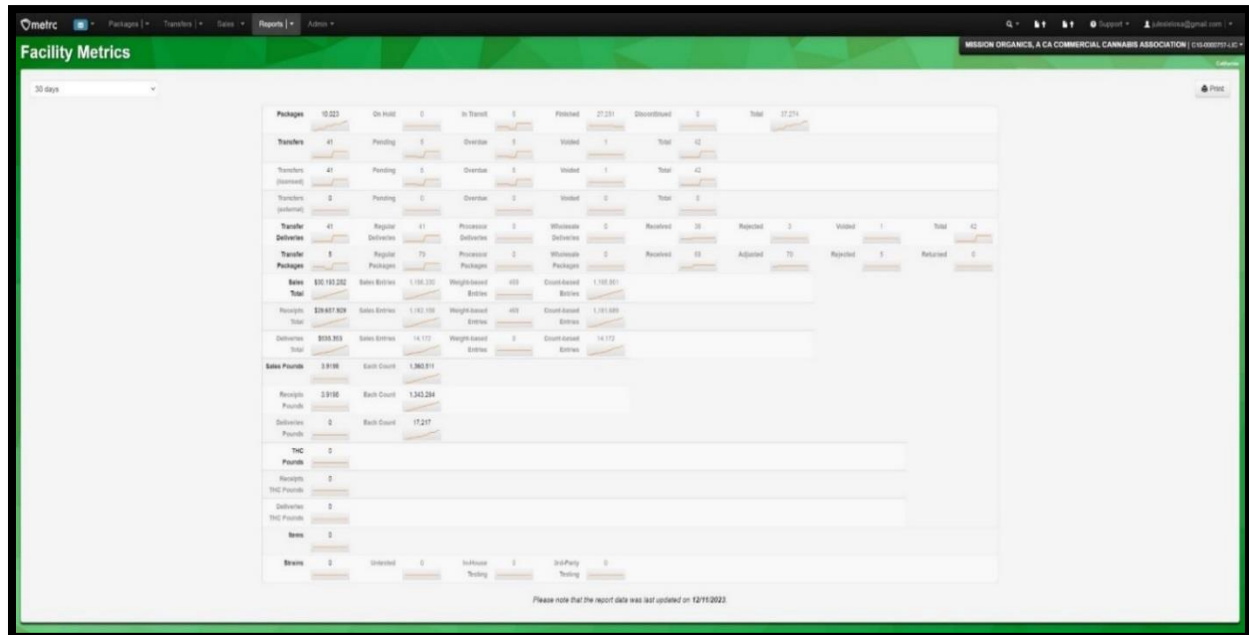
Culture has established best practices and the highest standards across all its operations, showcasing a commitment to quality, detail, and excellence in the cannabis retail space. Our standard operating procedures, developed from managing 11 Culture stores, are tried and tested, continuously refined based on evolving policies, industry trends, and feedback from third-party professionals.

We proudly assert the effectiveness of our processes, as our stores operate without sanctions, violations, or major issues, reflecting our success in upholding exceptionally high standards across all jurisdictions. Culture's operations not only meet but exceed industry best practices for cannabis retailers, incorporating established practices that ensure both operational efficiency and compliance.

<b>Security &amp; Safety of Retail Store</b>	<b>Quality Assurance of Products</b>
<b>Health &amp; Safety of Workers &amp; Guests</b>	<b>Track &amp; Trace of Products</b>
<b>Recordkeeping &amp; Accounting</b>	<b>Code Compliance</b>
<b>Sales Floor Efficiency</b>	<b>Sales Performance</b>

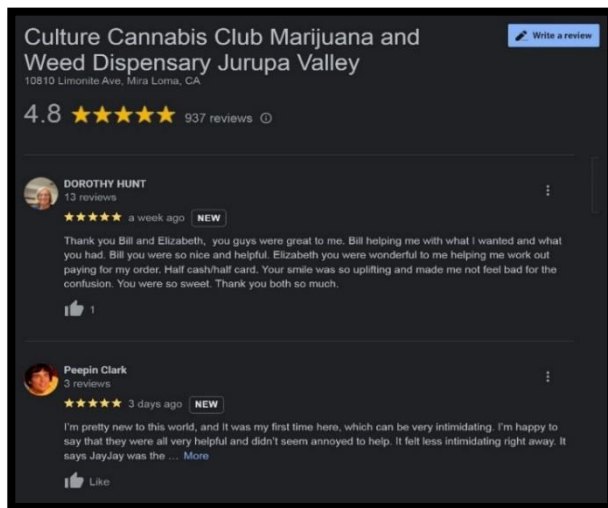
## EXAMPLE 1

Culture's SOPs incorporate an advanced inventory management system that minimizes discrepancies and maximizes accuracy. This system has been successfully implemented in our existing stores, contributing to seamless operations, reduced errors, and compliance with state regulations on tracking cannabis products. *Below is the Jurupa Valley store METRC report showing the intake of products, transfers, sales, etc.*



## EXAMPLE 2

Culture SOPs include comprehensive employee training programs, reflecting industry best practices for educating staff on legal compliance, customer service, and security measures. **These programs have been successfully implemented in our current stores, resulting in a knowledgeable and compliant workforce. Staff is regularly cited by customers in online reviews as being some of the most knowledgeable in the industry, evidenced in the customer reviews below.**

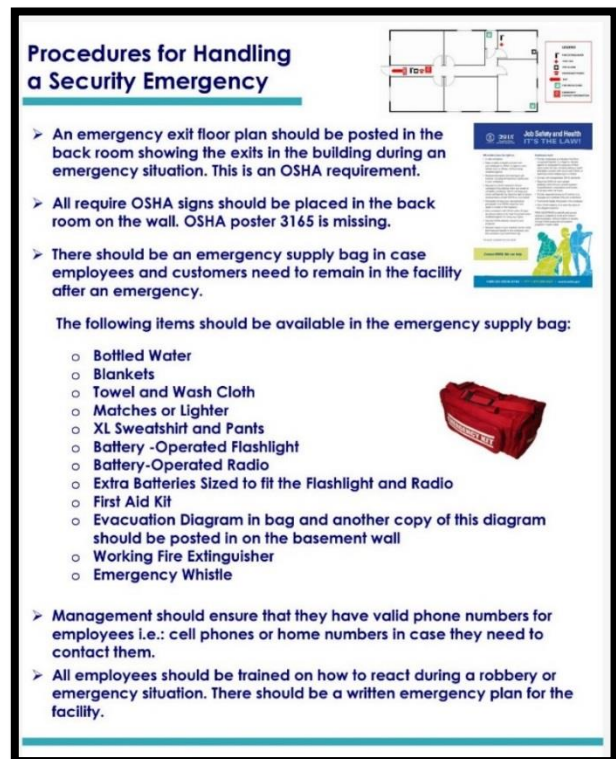


## EXAMPLE 3

Culture's SOPs outline robust security protocols for facilities, including surveillance systems, alarm systems, and security guard post-orders. Culture trains on emergency preparedness, and as a safeguard, incorporates third-party security assessments from Sapphire Risk, *as seen in the training guide to the right.* **These measures have been proven effective in safeguarding our existing stores, promoting a secure environment for both customers and staff.**

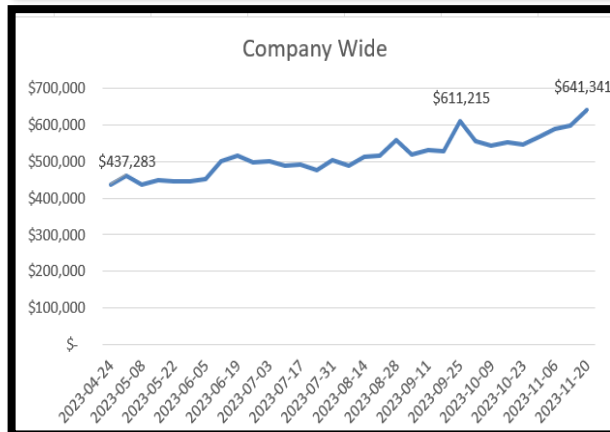
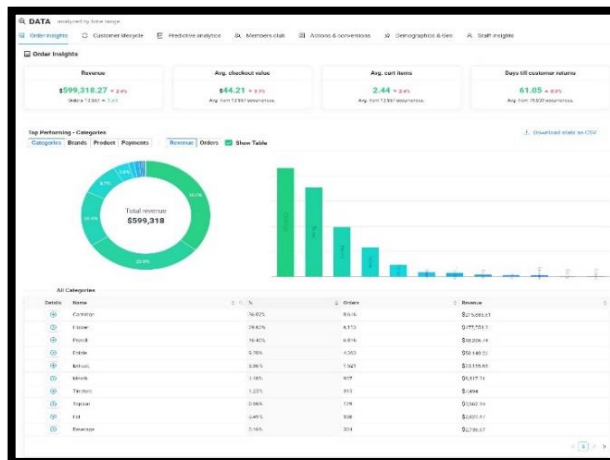
## EXAMPLE 4

Culture Sales Performance is a key indicator of efficacy of our practices. When customers shop and return, we know we have made an impact, provided quality customer care, ensured safe and reliable products, and created a space for everyone to feel welcome. The Owners, sales management team, and marketing team, focus on how to increase store traffic through targeted



marketing campaigns, enticing deal offerings, and engagement with beneficial initiatives. We ask ourselves daily, “how can we make an impact?”

Below we have offered the reviewers some insight into what it takes to plan our famous “Culture Day,” during which we annually host a major company-wide sales event. The success of this event year over year has been exponential. In the company-wide line graph **you will notice the uptick in sales in September 2023. You will also see data analytics, that showcase our adept tracking of customer traffic, sales categories, and daily performance. A curated focus on data tracking SOPs results in our ability to shift with trends and offer deals that drive customers into our stores.**



Step-by-Step for CULTURE Day on 9.30.23 - Jurupa Valley

Objective	Instructions	Call to Actions																																
Introduction	<ul style="list-style-type: none"><li>&gt; This document is designed to provide all the information and resources needed to execute a successful CULTURE Day!</li><li>&gt; The theme for this day is APOCALYPSE!</li></ul>																																	
Goal	<ul style="list-style-type: none"><li>&gt; The objective of this day is to celebrate CULTURE while maximizing revenue.</li><li>&gt; Goal is 20% increase from average last 4 Saturdays. Stretch Goal is a 35% increase.</li><li>&gt; Success metrics</li></ul> <table><tr><th colspan="4">Jurupa Valley</th></tr><tr><th></th><th>current</th><th>goal</th><th>stretch</th></tr><tr><td>Daily Revenue</td><td>31,717</td><td>38,061</td><td>42,818</td></tr><tr><td># Customer</td><td>594</td><td>713</td><td>802</td></tr><tr><td># New Customer</td><td>90</td><td>108</td><td>122</td></tr><tr><td>AOV</td><td>64.93</td><td>77.91</td><td>87.65</td></tr><tr><td>% Rewards Sign</td><td>25.96%</td><td>31.15%</td><td>35.05%</td></tr><tr><td># Culture Box Tickets Given</td><td></td><td>80</td><td>100</td></tr></table>	Jurupa Valley					current	goal	stretch	Daily Revenue	31,717	38,061	42,818	# Customer	594	713	802	# New Customer	90	108	122	AOV	64.93	77.91	87.65	% Rewards Sign	25.96%	31.15%	35.05%	# Culture Box Tickets Given		80	100	Numbers will be determined in V2
Jurupa Valley																																		
	current	goal	stretch																															
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AOV	64.93	77.91	87.65																															
% Rewards Sign	25.96%	31.15%	35.05%																															
# Culture Box Tickets Given		80	100																															
PRE-EVENT PREPARATION																																		
Physical Assets	<ul style="list-style-type: none"><li>&gt; CULTURE Day Flyers, received 1000</li><li>&gt; Store decorations</li></ul>	> Confirm receipt of 1000 flyers - scheduled for 9/11																																
Digital Assets	<ul style="list-style-type: none"><li>&gt; 8 x11 flyers for reception &amp; register display - <a href="#">LINK</a></li><li>&gt; TV Reel Save the Date Teaser posted. - <a href="#">LINK</a></li><li>&gt; TV Reel Brand Teaser posted. - <a href="#">LINK</a></li><li>&gt; Print SbS document and conduct team training</li></ul>	<ul style="list-style-type: none"><li>&gt; Print and display 8.5x11 in reception area ASAP</li><li>&gt; TV Reels to be posted on reception TVs and set to repeat.</li></ul>																																
Social Media Promo	> Insert social media strategy and post schedule	> Reshare HQ CULTURE Day IG post (insert dates)																																
Other Marketing Promo	<ul style="list-style-type: none"><li>&gt; Banners for Leafly, Dutchie, Weedmaps</li><li>&gt; Insert Email promo schedule</li></ul>	<ul style="list-style-type: none"><li>&gt; (HQ) Change banner images on 9/29</li><li>&gt; Insert action here. This is an example</li></ul>																																
Social Media Liaison	<ul style="list-style-type: none"><li>&gt; Reshare Culture Day promos Week 9/17-9/23</li><li>&gt; Reshare Culture Day promos Week 9/24-9/30</li><li>&gt; Re-share HQ Culture Day IG post. - <a href="#">LINK</a></li><li>&gt; Post content leading up to event teasing event</li><li>&gt; Post content day of event</li><li>&gt; Post content day after event thanking everyone who celebrated with us</li></ul>																																	
Update Assets -	> Update store receipt headers	> Confirm receipt text																																



### 3. OWNERSHIP'S INVOLVEMENT IN DAY TO DAY OPERATIONS AND MANAGEMENT

#### INVOLVEMENT OF OWNERS IN DAY-TO-DAY OPERATIONS

Owner and CEO Devon Julian will be involved with the Santee store on a daily basis, providing direct oversight to the management team and all Culture departments. Julie Le manages Administration of the company and the brand, and plays an integral role in product procurement, marketing campaigns, and overall management of the Culture store aesthetic.



#### DEVON'S DAILY INVOLVEMENT

- Manage application process, until final issuance of a City permit.
- Build relationships with community leaders, organizations, residents and City departments.
- Liaise closely with the planning and building departments, Police Department, City Manager, elected officials, and other relevant parties, once Culture is awarded a permit to operate.
- Manage funds and allocate investment appropriately throughout construction and start-up.
- Confer daily with Christina D'Angelo, the Director of Compliance, that all aspects of the business are aligning with regulations of the City and DCC.
- Spearhead operations team development for training and start-up, through first year, ensuring Management is shifted from other Culture stores appropriately.
- Negotiate product/brand deals with vendors & distributors, utilizing Culture's buying power to get bulk pricing for Santee location.
- Conduct monthly operations audits for review of sales, security, safety, and facility maintenance.
- Review sales reports for customer retention and satisfaction.
- Set quarterly sales goals for management team.
- Partner with unions for worker collective bargaining rights.
- Evaluate company needs quarterly and revise responsibilities as needed.

#### JULIE'S DAILY INVOLVEMENT

- Manage administration of the company human resources.
- Oversee Culture brand design, vision, aesthetics, and marketing campaigns.
- Prepare marketing materials to bring awareness to new store; maintain marketing campaigns to drive-in customers; work with marketing team to create unique campaigns beneficial to Santee demographics.
- Negotiate product contracts based on Culture buying power.
- Design Culture brand marketing campaigns that connect stores across the State.

- Innovate new products that cater to Santee demographics.
- Train staff on product and brand vision.

## OWNER QUALIFICATIONS

### OWNER DEVON JULIAN – CHIEF EXECUTIVE OFFICER

Devon Julian is an operations and compliance specialist with deep roots in the California cannabis industry, having been involved since 2007. As the Chief Executive Officer of Culture, he plays a crucial role in branding, sales, compliance, product sourcing, and employee training. His previous experience includes managing multiple Proposition 215 California Medical Marijuana compliant cultivation operations, where he oversaw all aspects of cultivation, maintained product quality control, negotiated distribution contracts, and fostered retail relationships. Bringing this wealth of experience to Culture, Mr. Julian organizes the entire organization and executes daily operations, focusing on scaling California operations with a dedicated team of professionals. He sets ambitious goals, aiming to have every newly licensed retail store operational within six months.



Before joining Culture, Devon was the owner of DJ Highrise, a successful consulting company he established in 2018, which specialized in cannabis operations consulting and regulatory compliance within the regulated market. His transition from the Prop 215 market to the new Prop 64 cannabis industry has provided him with invaluable insights into the compliant ownership and operation of successful cannabis businesses. Over the past decade, Mr. Julian has consulted for numerous cannabis companies, including Culture, offering expertise in operations, compliance, and staff management that positions Culture for significant success—benefiting the City of Santee in the process.

A former resident of Santee, Mr. Julian moved to the area in 1994 and has maintained strong connections to the community. His parents still live in his childhood home on Cuyamaca Street, and his grandmother resides nearby on El Nopal. He attended Carlton Hills Elementary School and was actively involved with Guardian Angels Catholic Church, participating in CCD, serving as an altar boy, and volunteering for community events like the fall festival. Mr. Julian graduated from West Hills High School in 2005, and his first job was at Village Carpets Flooring America in El Cajon, a family-owned business that has served Santee for the past six years.

Devon is also actively engaged with the East County San Diego Regional Chamber of Commerce and the Santee Chamber of Commerce, participating in various community events such as the annual gala, ribbon cuttings, and monthly coffee gatherings. Committed to giving back, he has donated to several charitable causes, including the Veterans Memorial on Mast Boulevard, the Measure S Protect Santee tax initiative, the Made to Change local school pantry program, and the Santee Food Bank. He enjoys attending community events like the Santee Firefighter pancake breakfast, further solidifying his connection to the community he values deeply. Through his work

and community involvement, Mr. Julian continues to make a positive impact on Santee and the surrounding areas.

### **OWNER JULIE LE – DIRECTOR OF ADMINISTRATION**



Julie Le has dedicated over 6 years to owning and operating businesses in the California cannabis industry, where she has developed a comprehensive understanding of various sectors, including retail, cultivation, and distribution. Her experience spans the creation of in-house curated top-shelf product lines, showcasing her commitment to quality and innovation. As the Founder of Culture Cannabis Club, Julie has made it her mission to introduce a distinctive offering to the market, setting Culture apart from other well-known brands.

With a vertically integrated portfolio, Julie is deeply involved in every facet of product creation. She takes great pride in sourcing the best growers and the highest-quality strains, ensuring that the cannabis products offered by Culture are not only reliable but also reflect her passion for excellence. Under her leadership, Culture Cannabis Club has built a reputation for integrity, quality, and a customer-centric approach.

As the Administrative Director, Julie's role encompasses a wide range of responsibilities that are crucial to the smooth operation of the business. She meticulously plans, administers, and controls budgets for contracts, equipment, and supplies, ensuring that resources are allocated efficiently to support the company's growth. Julie is also responsible for managing essential business filings, including California Sellers Permits, business licenses, and real estate documentation, which are vital for regulatory compliance.

Collaboration is key to Julie's leadership style; she works closely with legal counsel and CPAs to prepare ownership documents, establish corporations, open bank accounts, and ensure accurate tax payments. Her attention to detail extends to managing accounts payable and receivable, as well as overseeing payroll, all of which are critical for maintaining the financial health of Culture Cannabis Club.

In addition to her financial and operational duties, Julie plays a vital role in human resources. She is responsible for overseeing the HR Department, ensuring that Culture has a dedicated and capable team in place. Her leadership extends to directing and coordinating the support service departments, fostering an environment of collaboration and efficiency.

Julie's vision for Culture Cannabis Club goes beyond business success; she aims to create a positive impact within the community by promoting responsible cannabis consumption and contributing to local economic growth. Her extensive knowledge of the industry, combined with her entrepreneurial spirit, positions her as a leader and innovator in the cannabis space.

Through her efforts, Julie has established Culture Cannabis Club as a brand that stands for quality, community engagement, and a commitment to excellence. As the company continues to grow, Julie remains focused on its mission to provide exceptional cannabis products while upholding the highest standards of integrity and customer service.

CULTURE



## DEVON JULIAN

CHIEF EXECUTIVE OFFICER  
LICENSED CANNABIS RETAIL STORE OWNER

### PROFILE

A dedicated business operations professional with extensive experience scaling small businesses in multiple industries. A focused problem solver with a focus on innovative and creative solutions. A team player who focuses on cultivating the best people for the job with the autonomy to thrive and grow. Extensive experience in all facets of the cannabis supply chain focusing on understanding, optimizing and improving every step of the process.

### CULTURE CANNABIS CLUB

Culture Cannabis Club - Porterville  
Culture Cannabis Club - Jurupa Valley  
Culture Cannabis Club - Long Beach  
Culture Cannabis Club - Riverside County  
Culture Cannabis Club - Banning  
Culture Cannabis Club - Stanton  
Culture Cannabis Club - Fresno (x2)  
Culture Cannabis Club - Canyon Lake  
Culture Cannabis Club - Akron Ohio  
Culture Cannabis Club - Biloxi Mississippi

### TRAINING AND CERTS

**Planning Commissioners Academy from League of Cal Cities**

### EDUCATION

**Arizona State University**  
Bachelor of Science in Technological Entrepreneurship and Management  
**Oaksterdam University**  
Cannabis Business Seminar Graduate

### CAREER SUMMARY

#### **Chief Executive Officer - Culture Cannabis Club 2021 - Present**

Joined as COO of Culture after consulting for the group since 2018. Becoming Culture's CEO in 2021. Primary objective is scaling efficient and compliant operations across every arm of the vertically integrated operation. Responsibilities include business development, government relations, mergers and acquisitions, compliance, recruiting, operational oversight, and all phases of new product launches.

#### **Bloomstone - Chief Operating Officer 2020 - Present**

Designed and implemented business operations, established policies that promoted company culture and vision, and oversaw operations of the company and the work of Bloomstone executives.

#### **DJ Highrise - Chief Executive Officer - 2018**

Provide executive leadership and process development during a revenue growth phase. Responsible for business development, financial reporting, human resources, payroll, cannabis cultivation consultation, government relations, permit application, and other cannabis consulting and operations.

#### **Freelance Consulting- 2017-2018**

Consultant focused on California Proposition 215 medical marijuana, marijuana cultivation and dispensing. Responsible for Cultivation design. Operated a cultivation operation for more than 4 years.

### HOW TO REACH ME

Cell: 619-277-2827  
Email: devon@culturecannabisclub.com



CULTURE



JULIE LE

DIRECTOR OF ADMINISTRATION

### PROFILE

As the Founder, Creator, Director of Administration and Brand Curator of Culture Cannabis Club, Julie knows embodies the DNA of Culture's brand. She focuses on building brand strength and recognition in new markets, and preserves the brand essence through overseeing the Marketing and Design departments of the company. To maintain the authenticity and integrity of the brand image, mission, and goals, she skillfully guides each individual on the team to honor their own creativity while striving to display industry best practices, customer safety and satisfaction, and profound public service.

Julie Le has led her team in the regulated California cannabis industry for the past six years. She has learned much navigating the regulatory changes as the state shifted from medical to adult-use over that time. As Owner and Administrative Director of Culture Cannabis Club, Ms. Le focuses on planning, administering, and controlling budgets for contracts, equipment, and supplies, as well as managing business filings such as California Sellers Permits, business licenses, and real estate documentation. She also works with legal counsel and CPAs to prepare ownership documents, form corporations, open bank accounts, pay taxes, and manage accounts payable and receivable, and payroll. Julie also directs and coordinates Culture's support service departments and operations teams to ensure seamless, compliant operations at all Culture facilities.

### HOW TO REACH ME

Cell: (714)-657-9628

Email: Julie@culturecannabisclub.com

### CAREER SUMMARY

Julie's Ownership and Culture Enterprise Includes:

#### California Open Facilities

- Culture Cannabis Club - Retail - Jurupa Valley
- Culture Cannabis Club - Retail - Porterville
- Culture Cannabis Club - Retail - Banning
- Culture Cannabis Club - Retail - Long Beach
- Culture Cannabis Club Micro - Riverside County
- Culture Cannabis Club - Retail - Stanton
- Culture Cannabis Club - Retail - Fresno
- Culture Cannabis Club - Retail - Fresno
- Culture Cannabis Club - Retail - Ohio
- Culture Cannabis Club - Retail - Mississippi
- Empire Perez - Cultivation - Cathedral City
- Desert Hot Springs - Cultivation
- Non Culture - Retail - Marina

#### California In Construction - Complete 2024-2025

- Culture Cannabis Club - Retail Chatsworth
- Culture Cannabis Club - Retail - San Bernardino
- Culture Cannabis Club - Retail - Costa Mesa
- Culture Cannabis Club - Retail - Daly City
- Culture Cannabis Club - Retail - Barstow
- Culture Cannabis Club - Retail - Concord
- Culture Cannabis Club - Retail - San Francisco
- Culture Cannabis Club - Retail - Merced
- Culture Cannabis Club - Retail - Beverly Hills
- Culture Cannabis Club - Retail - Stockton
- Culture Cannabis Club - Retail - Indio
- Culture Cannabis Club - Retail - Monterey
- Cultivation - Nursery Facility - Banning
- Cultivation - Indoor Facility - Stanton

#### California Under Review

- Culture Cannabis Club - Covina

#### Other States Under Review

- Culture Cannabis Club - Retail - New Jersey
- Culture Cannabis Club - Retail - Ohio
- Culture Cannabis Club - Florida

## **SECTION E : NEIGHBORHOOD COMPATIBILITY PLAN**

### **1. NUISANCE MITIGATION PLAN**

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#### **SUMMARY**

To proactively avoid becoming a nuisance and minimize negative impacts on the surrounding community, our cannabis retail store will implement several strategies. First, we will conduct a thorough assessment of the site's surroundings to ensure compliance with local zoning regulations and community standards. This includes selecting appropriate operating hours to minimize noise and traffic disturbances, especially during late hours. By fostering a culture of accountability and responsiveness, we aim to build strong relationships with our neighbors, ensuring that our operations contribute positively to the community while addressing any issues that may arise.

#### **COMPLAINT PROTOCOLS**

To address potential community concerns, we will establish a dedicated community liaison who will be responsible for maintaining open lines of communication with neighbors and local stakeholders. This liaison will be the first point of contact for any complaints and will organize regular community meetings to foster dialogue and transparency.

In the event of complaints related to noise, light, odor, public consumption, loitering, littering, and traffic, our store will have a clear response plan. Complaints will be documented and investigated promptly. We will engage with affected parties to understand their concerns and work collaboratively to find effective solutions, such as adjusting operating hours or increasing security presence if necessary.

#### **NOISE, LIGHT, ODOR**

We will prioritize soundproofing measures within the store to limit noise pollution and ensure that any outdoor lighting is directed away from neighboring properties. Additionally, we will implement a robust odor management system, using air filtration and ventilation to mitigate any cannabis scent that could affect nearby residents.

#### **ODOR MITIGATION PRACTICES**

Culture has designed the following odor abatement plan, which includes the incorporation of the best available odor control technology and devices in the overall design of the facility to prevent nuisance odors from being detected off-site. The system prevents cannabis odor distinctive to the operations from being detected in any neighboring suites, common areas, sidewalks, outside areas, adjacent lots, or anywhere outside of the operation. Besides the following hardware and operations plan, all products provided will be in sealed child-resistant containers, and rules prohibiting on-site consumption will be enforced by employees and security on and around the premises.

## EQUIPMENT

Culture will use the CleanLeaf brand fan and filter equipment. This system is a proven method to eliminate volatile organic compounds, pollutants, gasses, and odors from the air, and is utilized by many cannabis operators in the industry. The air is recirculated throughout the areas containing cannabis products and near entrance and exit doors to prevent odors from escaping the facility. The activated carbon literally traps and absorbs the carbon-based contaminants in the air.

## INSTALLATION

Culture will calculate air changeover rates and install a system designed to complete a changeover of all air in the facility at least every 20 minutes. The system will be installed by a professional contractor who will test the system to ensure functionality and that all stated air change over rates and cubic feet per minute rates are being achieved. In areas where customers are present - the sales floor and the reception area - the system will be secured in the drop ceiling or on the wall and shielded from view using building materials that match the rest of the interior. In the storage room, the system will be installed on the drop ceiling or affixed to the wall at the Planning Department's direction. Culture runs the odor abatement system in the reception area and sales floor during business hours with an additional hour before and after to ensure all air in the rooms has been changed over at least three times. When the business is closed, all cannabis products will remain in sealed cabinets in the secure storage room. The odor abatement system in the secure storage room will run 24 hours a day, 7 days a week.

## STAFF TRAINING AND SYSTEM MAINTENANCE PLAN

Staff will be trained to identify and address odors daily. Staff training will include:

- Understanding the potential sources of odor, as described above.
- Odor abatement system maintenance procedures.
- Proper procedures for checking and logging odors and sources and keeping the log on file (see odor checklist below).
- Actions permissible to address odor, including going over a list of the contracted services that address odor, such as the engineer/system technician that services odor control filters, the waste hauler, and the HVAC maintenance company.



## **PUBLIC CONSUMPTION**

To address public consumption, our cannabis retail store will take proactive steps to ensure that our operations promote responsible use and minimize any negative impacts on the surrounding community. We will clearly communicate to customers that public consumption of cannabis is prohibited, both through signage in and around the store and during employee interactions with customers.

Our staff will be trained to educate customers about local laws regarding cannabis use, emphasizing the importance of consuming products in private settings. We will also collaborate with local advocacy groups to promote responsible consumption and provide resources for customers on safe and legal usage.

Additionally, we will actively monitor the areas around our store for any instances of public consumption and address them promptly. If we receive complaints or observe individuals consuming cannabis in public spaces near our establishment, we will intervene by engaging directly with those individuals to remind them of the local laws and encourage them to consume responsibly in private settings.

Through these measures, we aim to foster a culture of responsible cannabis use that aligns with community standards and helps to mitigate any concerns related to public consumption. By promoting education and compliance, we hope to maintain a positive relationship with our neighbors and contribute to a respectful community environment.

## **LOITERING**

To effectively address loitering around our cannabis retail store, we will implement a comprehensive strategy aimed at minimizing its occurrence and maintaining a welcoming environment for all community members.

### **PROACTIVE MEASURES**

**Clear Policies and Signage:** We will prominently display signs around the store that outline our policies regarding loitering and public behavior. This will inform customers and passersby of our expectations and the importance of respecting the surrounding area.

**Community Engagement:** Our staff will be trained to engage positively with customers, encouraging them to move along after their purchases. This proactive approach can help prevent lingering and reinforce the message that loitering is not acceptable.

**Collaboration with Local Law Enforcement:** We will establish a relationship with local law enforcement and community organizations to address loitering concerns. This collaboration can provide additional support and resources for managing any issues that arise.

**Regular Monitoring:** We will conduct regular checks of the areas around our store to identify any loitering patterns or problematic behavior. This will allow us to respond quickly and effectively.

### **RESPONSE PLAN**

In the event of loitering incidents, our approach will include:



**Direct Engagement:** Our staff will be instructed to politely ask individuals loitering near the store to move along. This engagement will be conducted with respect and understanding, emphasizing community norms.

**Incident Reporting:** Any loitering incidents will be documented and reviewed. If issues persist, we will escalate our response by involving local authorities or community organizations as needed.

**Feedback Mechanism:** We will provide a platform for community members to report concerns related to loitering. This feedback will help us adjust our strategies and improve our operations.

By combining proactive measures with a clear response plan, we aim to minimize loitering and foster a safe and respectful environment for our customers and the surrounding community.

## **TRAFFIC (VEHICLE & PEDESTRIAN)**

To address potential traffic congestion caused by vehicles and pedestrians around our cannabis retail store, we will implement a multi-faceted strategy aimed at ensuring smooth traffic flow and enhancing safety for all community members.

### **PROACTIVE MEASURES**

**Site Planning and Design:** Our store will be strategically located to minimize disruption to existing traffic patterns. We will ensure that the entrance and exit points are clearly marked and designed to facilitate efficient vehicle movement.

**Parking Management:** We will provide adequate parking spaces to accommodate customers, reducing the likelihood of overflow into neighboring areas. Clear signage will direct customers to available parking, and we will monitor parking usage to make adjustments as necessary.

**Pedestrian Safety:** To enhance safety for pedestrians, we will install clear crosswalks and appropriate signage near the store. We will also consider working with local authorities to improve sidewalks and lighting in the surrounding area.

**Operational Hours:** We will analyze peak traffic times and adjust our store hours to minimize congestion during high-traffic periods. This might include opening earlier or later to spread out customer visits.

### **RESPONSE PLAN**

In the event of traffic or congestion issues, our response plan will include:

**Monitoring and Assessment:** We will regularly assess traffic flow around the store, using feedback from customers and community members to identify any problem areas or times.

**Engagement with Local Authorities:** We will maintain an open line of communication with local law enforcement and traffic management authorities to address any ongoing traffic issues and seek their guidance on improving traffic conditions.

**Customer Communication:** We will communicate with our customers through in-store signage and social media about the best times to visit and parking options, helping to reduce congestion during peak hours.

**Feedback Mechanism:** We will establish a system for community members to report concerns related to traffic congestion. This feedback will be crucial for making timely adjustments to our operations.

By proactively managing vehicle and pedestrian traffic, we aim to minimize congestion and create a safe and efficient environment for both our customers and the surrounding community.

## **SOCIAL MEDIA INCORPORATION IN COMPLAINT HANDLING**

Incorporating social media into our strategy for handling complaints is essential for fostering transparency, engagement, and timely responses. Here's how we plan to utilize social media effectively:

### **MONITORING AND ENGAGEMENT**

**Active Presence:** We will maintain active profiles on major social media platforms such as Facebook, Instagram, and Twitter. This will allow us to engage with the community and respond to inquiries or complaints in real-time.

**Proactive Monitoring:** Our team will regularly monitor social media channels for mentions of our business, looking for feedback or complaints related to noise, odor, public consumption, loitering, and other concerns. Tools and alerts can be set up to ensure we don't miss any mentions.

**Community Engagement:** We will actively engage with our followers by encouraging them to share their experiences, concerns, or suggestions. This creates a dialogue that helps us address issues before they escalate.

### **RESPONSE STRATEGY**

**Timely Responses:** When complaints arise on social media, our team will respond promptly and professionally. Acknowledging the issue and providing information on how we plan to address it demonstrates our commitment to community satisfaction.

**Direct Communication:** If a complaint requires more detailed discussion, we will invite the individual to connect with us privately via direct messaging or phone. This allows for a more personal touch and helps resolve issues more effectively.

**Transparency:** We will keep the community informed about the steps we are taking to address specific complaints. This could include updates on changes in operations, community meetings, or new initiatives based on feedback.

### **EDUCATIONAL CONTENT**

**Informative Posts:** We will use our social media platforms to share educational content about responsible cannabis use, local regulations, and community guidelines. This proactive approach can help mitigate issues before they arise.

**Highlighting Community Engagement:** We will showcase our involvement in community events, partnerships, and contributions to local causes. By promoting our positive impact, we can foster goodwill and strengthen relationships with our neighbors.

By leveraging social media effectively, we aim to create a responsive and engaged community around our business. This approach not only helps us address complaints swiftly but also builds trust and transparency with our customers and neighbors.

## 2. YOUTH DIVERSION PREVENTION PLAN

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### SUMMARY

Youth diversion prevention focuses on strategies and programs designed to steer young individuals away from engaging in risky behaviors, particularly substance use, and to promote positive decision-making. Effective approaches include community education, peer mentoring, and involvement in extracurricular activities that foster skills and resilience. Schools and local organizations play a crucial role by offering workshops and resources that educate youth about the consequences of substance use, promoting healthy alternatives. Collaborating with families and community leaders enhances outreach efforts, ensuring that youth have access to support systems. By creating an environment that emphasizes positive choices and constructive activities, youth diversion prevention aims to reduce the likelihood of substance-related issues and encourage healthier lifestyles.

### STRATEGY

To ensure that our cannabis products do not end up in the hands of underage youth, we will implement a comprehensive set of policies and enforcement strategies focused on education, strict compliance, and community engagement.

### POLICIES

#### 1. Age Verification Procedures:

- We will require all customers to present valid government-issued identification (ID) proving they are at least 21 years old before entering the store or purchasing any products.
- Staff will be trained to recognize valid forms of ID and to spot fraudulent IDs.

#### 2. Employee Training:

- All employees will undergo mandatory training on age verification processes, responsible sales practices, and the importance of preventing underage access to cannabis products.
- Training will include scenario-based learning to prepare staff for potential challenges in verifying age.

#### 3. Clear Signage:

- We will display clear and prominent signage at all entry points and throughout the store stating that no one under 21 is permitted on the premises.
- Informational materials about the legal age for cannabis consumption will also be available.

**4. Strict Marketing Policies:**

- We will avoid any marketing strategies that could appeal to underage audiences, including the use of cartoons or popular youth-oriented media.
- All promotional materials will clearly state the legal age for purchase.

**ENFORCEMENT STRATEGIES**

**1. Regular Audits:**

- We will conduct regular internal audits to ensure compliance with age verification policies. This includes mystery shopper programs to test employee adherence to policies.

**2. Incident Reporting System:**

- A system will be established for employees to report any incidents or attempts at underage purchasing. These reports will be reviewed and addressed promptly.

**3. Collaboration with Local Authorities:**

- We will partner with local law enforcement and community organizations to participate in awareness campaigns aimed at preventing underage access to cannabis products.

**4. Community Education Programs:**

- We will engage in outreach programs to educate the community about the risks of underage cannabis use and the importance of age restrictions.

**5. Disciplinary Measures:**

- Employees who fail to adhere to age verification procedures will face disciplinary action, including retraining or potential termination, depending on the severity of the violation.

By implementing these policies and enforcement strategies, we aim to create a responsible retail environment that prioritizes the safety and well-being of the community while ensuring compliance with all legal requirements regarding the sale of cannabis products.



## SECTION F : COMMUNITY BENEFITS & INVESTMENT PLAN



### 1. BENEFIT PLAN SUMMARY

Culture is proud to boast its owner and Chief Executive Officer, Devon Julian, is a former resident of Santee. Mr. Julian moved to Santee in 1994 and has established deep roots in the community. His parents continue to reside in his childhood home on Cuyamaca Street, while his grandmother lives nearby on El Nopal. Mr. Julian attended Carlton Hills Elementary School and was actively involved with Guardian Angels Catholic Church, participating in CCD, serving as an altar boy, and volunteering for the fall festival. He graduated from West Hills High School in 2005. Mr. Julian's first job was at Village Carpets Flooring America in El Cajon, a family-owned business that has since relocated to proudly serve Santee for the past six years. He is actively engaged with the East County San Diego Regional Chamber of Commerce and the Santee Chamber of Commerce, participating in events such as the annual gala, ribbon cuttings, and monthly coffee gatherings. Additionally, Mr. Julian is committed to giving back to the community, having donated to various charitable causes, including the Veterans Memorial on Mast Boulevard, the Measure S Protect Santee tax initiative, the Made to Change local school pantry program, and the Santee Food Bank. He also enjoys attending community events like the Santee Firefighter pancake breakfast.



Culture is committed to making a direct financial contribution to the City of Santee as part of its dedication to community engagement and social responsibility. To support mutual goals with the City, the company has adopted a policy to donate seven percent (7%) of its Gross Receipts. In addition, Culture will contribute an extra one percent (1%) of its Gross Sales to a community benefit fund. This financial commitment underscores Culture's recognition of the importance of giving back to the community it serves.

If awarded a local cannabis permit, Culture, led by owners Devon Julian and Julie Le, aims to play an active role in supporting the Santee community through various non-profit organizations and

civic engagement initiatives. Mr. Julian is dedicated to investing significant time in these efforts, in line with industry standards for community involvement. The planned activities include:

- **Establishing the Culture Community Program:** The program will manage funds collected and hold meetings to create annual goals and effectuate outreach plans.
- **Partnerships with Local Non-Profits:** Culture intends to forge partnerships with local non-profit organizations focused on community well-being, education, and social welfare. This will involve providing financial support, volunteering time, and collaborating on projects.
- **Sponsorship of Events and Activities:** Culture plans to sponsor and engage in local events that foster community spirit. This includes supporting charity events, cultural celebrations, and educational programs aimed at benefiting Santee residents.
- **Civic Engagement Initiatives:** The proposal emphasizes Culture's commitment to civic engagement by encouraging owners and employees to take part in local initiatives, town hall meetings, and community forums. This participation will help ensure that Culture remains responsive to the evolving needs of the Santee community.
- **Educational Outreach Programs:** Culture envisions hosting educational sessions about the cannabis industry, highlighting its benefits and promoting responsible consumption. These sessions will aim to dispel misconceptions, address concerns, and enhance understanding of Culture's role within the community.
- **Calendar of Events:** Detailed plans regarding the allocation of time, activities, and participation will be developed in collaboration with selected non-profit partners, exceeding established industry norms for community engagement. The objective is to ensure that Culture's presence makes a positive impact on the Santee community, enriching both its economic and social landscape.
- **Volunteer Time:** Culture anticipates dedicating at least 8 hours per month to event planning, volunteering, or other city-related activities.



## COMMUNITY LIAISON AND CULTURE OUTREACH TEAM



The *Culture Outreach* team looks for foundations, charities, and organizations that can improve the quality of life for all citizens in Santee by providing social benefits and financial assistance. By carefully selecting our partner organizations, Culture is confident that granting us a license to operate a retail cannabis dispensary will lead to a lasting and positive social impact in Santee. Our collaboration with organizations will empower our *Culture Outreach* team to make meaningful contributions to the City and community of Santee. Once a partnership has been agreed upon with clear collaborative expectations, Culture will create the *Culture Community* program further outlined in the next paragraph. Led by our Director of Community Outreach, And Community Liaison Devon Julian, the *Culture Outreach* team is a collaborative body comprising members from various stakeholders, including company

owners, staff, and city officials. This diverse composition ensures a well-rounded and inclusive decision-making process, aligning with Culture's commitment to community engagement and shared responsibility. The team functions as a strategic forum where key decisions related to community initiatives, resource allocation, and corporate social responsibility are discussed and determined. Drawing on the insights and perspectives of company owners provides strategic direction and a comprehensive understanding of Culture's mission and values. Inclusion of staff members in the *Culture Outreach* team brings frontline insights, ensuring that the initiatives undertaken resonate with the employees who are an integral part of the local community. Their experiences and perspectives contribute to the practicality and effectiveness of community programs. City officials' presence on the team fosters a strong partnership between Culture and the local government. This collaboration ensures that the initiatives align with broader city goals and regulations, promoting a cohesive approach to community development. The *Culture Outreach* team plays a pivotal role in evaluating proposals from non-profit organizations and community programs, making informed decisions on the allocation of resources, and overseeing the implementation of initiatives.

## VETERAN'S AFFAIRS

Culture partners with local veterans' organizations such as the VFW or the American Legion to create training and career opportunities for transitioning service members, military veterans, and their spouses, through a variety of opportunities. These initiatives include cannabis training and employment programs that create pathways to meaningful careers in the cannabis industry. We strive to raise awareness of the value of hiring veterans.





## LEAGUE OF CALIFORNIA CITIES



Culture is fortunate to be the only cannabis company to become a Premier Partner to the League of California Cities League Partner Program. This partnership affords Culture two non-voting seats on each of the League's policy committees. Through our partnership with Cal Cities, we can better reach the municipalities in which we currently operate - and those in which we are seeking to operate - with open dialogue and mutual interest. We can help cities leverage Federal and State relationships to assist our communities in procuring tax exempt bonds to finance infrastructure projects or multi-family and mixed-use projects in underserved areas.

Culture works with Cal Cities to bring real information and data to policymakers and city officials about the cannabis industry, with the goal of ensuring cities are being provided with the necessary tools to start and run their cannabis programs effectively and efficiently. Culture's goals are:

- Each city has the opportunity to run a robust and successful cannabis business program generating additional revenue for the City General Fund.
- Tax dollars and contributions are organized and allocated to benefit each city's unique needs; and City leaders have accurate and proven information about cannabis to best educate and serve their constituents.

## CULTURE'S COMMITMENT TO SUPPORTING THE 55+ POPULATION & VETERANS

Residents aged 55+ and Military Veterans are increasingly turning to cannabis and CBD as a healthier alternative to opioids and other costly medications to manage pain, certain illnesses, sleep disorders, decreased appetite, and many other health issues. 55+ Americans are one of the fastest growing demographics in the country, and we've found that along with Veterans, these groups of individuals often request and respond positively to targeted education on the use of cannabis for medical purposes. Culture provides creative and ongoing education programs for our 55+ and veteran customers. Our state-of-the-art and uncomplicated digital kiosks allow individuals to get detailed information about a product and its wellness characteristics. We also offer private consultation areas where a customer or patient can ask questions about their specific wellness goals and get personalized answers from an experienced Culture employee. Targeted outreach programs take place at





scheduled times at senior living facilities or veteran centers where Culture Community's educated ambassadors can talk to small groups of residents about the benefits of moderate consumption of cannabis.

## **YOUTH EDUCATION AND YOUTH INCUBATION**

Culture would like to create a robust youth education and youth incubation program to protect the most vulnerable and susceptible of our community to the negative impacts of substance abuse, crime, gangs and violence. Our goal is to support prevention activities and youth education on the negative impacts of substance abuse, including cannabis.

It takes an entire community effort to beautify a city, and Culture is there to help!

Throughout 2021-2024, with the help of local citizen groups, Culture has organized and enacted the following efforts:

- Raised awareness and donated to local animal shelters and at-risk friends.
- Donated to Corona teacher foundation to help purchase school supplies for kids.
- Donated to a homeless family program to feed and provide care.
- Donated and partnered with the Cal Cities to help them educate cannabis in new emerging cities.
- Assisted with local park clean-ups in Long Beach.
- Hosted a Vaccine Clinic in Fresno, CA.



Culture follows through on the promises it makes to its community. Culture was excited to spearhead a very successful beach clean-up that removed approximately 30 pounds of trash from the Long Beach beaches. Culture Corona has partnered with South Hills Church by organizing Angel Tree, an

event designed to provide gifts to children with parents incarcerated during the holiday season. Culture Banning donates to A.R.E Animal Rescue making an impact on the care and difference the organization makes toward saving animals. In line with its efforts to help our four-legged friends, Culture hosted 10 Days of Giving, a fundraising event that provides nutritional care to animals in desperate need. Culture Long Beach continues to make a difference in its community with its beautifying efforts aimed at parks hosting monthly park cleanups in partnership with El Dorado Park. Lastly Culture is most proud of its partnership with HeroGrown Foundation hosting the 12 Days of Cheer event. HeroGrown is an organization designed to help veterans discover the healing potential of hemp and cannabis.

**CULTURE'S 10 DAYS OF GIVING**



**ARE ANIMAL RESCUE**  
ADOPT | VOLUNTEER | FOSTER

A 501(c)3 NON-PROFIT ORGANIZATION



"EVERY DONATION WE GET, WHETHER IT'S FIVE DOLLARS OR A HUNDRED DOLLARS, COUNTS. THE DONATIONS FROM CULTURE ARE HUGE... THOSE DOLLARS ARE ABLE TO REALLY MAKE AN IMPACT. I CAN'T TELL YOU HOW MUCH I APPRECIATE YOU GUYS."  
- Amber S. (A.R.E. Founder)



**CULTURE FIGHTS FOR MEDICINAL CANNABIS**



**CULTURE 12 DAYS OF CHEER**  
DECEMBER 13th-25th  
HELP SPREAD THE HOLIDAY SPIRIT

INSPIRED BY THE WORKS OF NICK AND ROGER MARTIN, CULTURE PARTNERED WITH HEROGROWN FOUNDATION TO HOST THE 12 DAYS OF CHEER. THE TWELVE DAY EVENT WAS CREATED TO FUNDRAISE FOR THE LIBERATION OF MEDICINAL CANNABIS USE FOR OUR VETERANS.

PROVIDING THE GIFT OF CHEER DURING THE HOLIDAY SEASON WITH THE SUPPORT OF OTHER NOTABLE CANNABIS BRANDS, CLUB MEMBERS WERE GIVEN THE OPPORTUNITY TO TAKE PART IN THE CAUSE WITH EVERY PURCHASE.

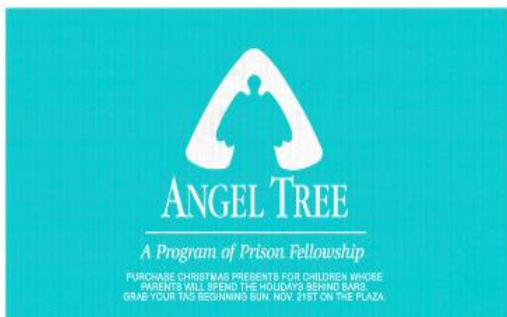
NEWSWIRE LINK ABOUT THE EVENT:  
[HTTPS://RB.GY/CI3961](https://rb.gy/ci3961)



**HERO GROWN**



**CULTURE x SOUTH HILLS CHURCH**




**ANGEL TREE**  
A Program of Prison Fellowship

PURCHASE CHRISTMAS PRESENTS FOR CHILDREN WHOSE PARENTS WILL SPEND THE HOLIDAYS BEHIND BARS. GRAB YOUR TAG BEGINNING SUN. NOV. 21ST ON THE PLAZA.

"I AM THRILLED TO PARTNER WITH YOU IN THIS COMMUNITY EVENT THROUGH ANGEL TREE. WE WILL BE PROVIDING GIFTS TO CHILDREN WHO HAVE A PARENT INCARCERATED THIS HOLIDAY SEASON. I KNOW WE WILL BE ABLE TO HELP EVEN MORE CHILDREN NOW BECAUSE OF YOUR GENEROUS DONATION!"

*GRETCHEN SMITH*  
SOUTH HILLS CHURCH COMMUNITY DIRECTOR



**CULTURE'S 10 DAYS OF GIVING**



**TOGETHER, WE MADE A DIFFERENCE.**

**10 DAYS OF GIVING**

CULTURE HOSTED A 10 DAY FUNDRAISING EVENT TO PROVIDE CARE FOR RESCUED ANIMALS DESPERATELY IN NEED OF PROPER NUTRITION, LIFE-SAVING MEDICAL TREATMENT, AND A FOREVER HOME. PROCEEDS MADE FROM THE EVENT WERE DONATED TO NON-PROFIT ORGANIZATIONS BASED IN SOUTHERN CALIFORNIA, SUCH AS A.R.E. ANIMAL RESCUE AND OTHER NON-PROFITS.

CULTURE WAS ALSO FEATURED ON MULTIPLE DIGITAL NEWSLETTERS, SUCH AS NEWSWIRE: [HTTPS://RB.GY/ZKUXFL](https://rb.gy/zkuxfl)



## 2. WAGES

Culture anticipates hiring approximately 25 employees to work in the retail store and to conduct delivery orders, not including the owners or security personnel. Culture aims to hire a majority of full-time employees and leaves room for part-time employees that seek limited hours. Culture prefers hiring full-time because we find that employees that are present every day and receive benefits are committed to the business and remain productive, contributing members of the community. However, part-time staff is still crucial for padding shifts to adjust for peak sales periods, whether it be daily or seasonally, and during promotional periods when more traffic is expected. At initial opening, Culture expected to hire 15 staff members.

At full capacity, Culture expected to reach 25 staff members.

Culture believes in creating growth and prosperity everywhere it goes. Providing long-lasting foundational support for its employees in the form of financial stability, Culture believes in building its people up and sharing its successes with them. Because of this foundational element of the company ethos, Culture will provide the City with a significant job generation source and its employees with living wages and benefits that exceed common industry standards.

WAGE CHART		SANTEE, CA		
Employee Types	Number of Owners / Employees	Average Hourly Pay	Estimated Hrs./Week (per person)	Estimated Pay/Month (Total)
Third Party Security Guards	2	\$ 24.00	35	\$ 7,280.00
Management	1	\$ 33.00	35	\$ 5,005.00
Assistant Managers	2	\$ 28.00	35	\$ 8,493.33
Sales Associates Full Time	10	\$ 18.00	35	\$ 27,300.00
Sales Associates Part Time	4	\$ 18.00	15	\$ 4,680.00
Receptionists Full Time	2	\$ 18.00	35	\$ 5,460.00
Receptionist Part Time	1	\$ 18.00	15	\$ 1,170.00
Inventory-Quality Control	1	\$ 19.00	35	\$ 2,881.67
Delivery Drivers	2	\$ 18.00	35	\$ 5,460.00
<b>Total Salaries and Wages</b>	<b>25</b>	<b>\$ 233.00</b>	<b>275</b>	<b>\$ 67,730.00</b>

## EMPLOYEE BENEFITS

### SUMMARY

Culture prioritizes positive employee relations, fostering a thriving workplace where team members feel engaged and vital to the company's success. We emphasize transparent communication through regular team meetings and feedback sessions, promoting trust and collaboration. Committed to fair employment practices, Culture maintains clear policies on conduct, expectations, and benefits to ensure equity among staff. We invest in professional development by offering training programs and Continuing Education Grants of up to \$5,000 annually for accredited courses, including coverage for cannabis-related courses. This dedication to open communication, fair policies, and ongoing learning shapes Culture's approach to employee relations.

Culture's compensation is above industry standards, with entry-level wages that are \$2.00 higher than minimum wage and senior level wages are competitive to comparable industries. Additional benefits include:

- Annual raises and bonuses
- Tuition reimbursement
- Employee discounts
- Paid time off
- Generous vacation time

We prioritize work-life balance with paid leave benefits that comply with State and Federal medical leave laws. Full-time employees accrue annual paid vacation time, while hourly and salaried staff enjoy increasing allowances based on their years of service.

401k	Health/Dental/Eye Insurance
Entry level wages are \$2.00 higher than minimum wage	Senior level wages are competitive to comparable industries
Annual Raises and Bonuses	Tuition Reimbursement Program
Employee Discounts	Paid/Sick Time Off
Vacation Time Accrual	Maternity Leave
Day Care Assistance	Paid Volunteer Hours
Bereavement Days	

## HEALTH CARE

Culture is deeply committed to the well-being of its employees, recognizing that a robust benefits package is essential for fostering a healthy, productive workforce. Our healthcare coverage is provided through Blue Shield of California's Trio HMO Plan, which not only offers a wide range of medical services but also includes a 50% premium contribution from the company. This substantial support ensures that employees have access to quality healthcare without facing overwhelming out-of-pocket costs.

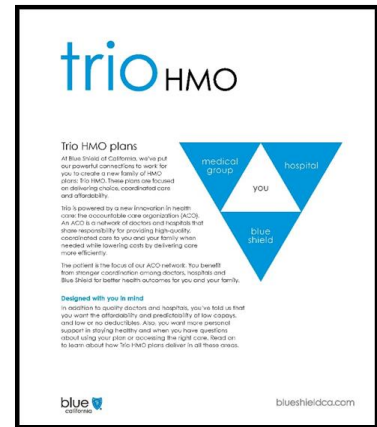


In addition to our healthcare offerings, we prioritize financial wellness through our 401(k) retirement plan, managed by Fidelity. This plan features a 3% matching contribution from Culture, encouraging employees to save for their future and providing an additional layer of financial security. We also offer financial wellness workshops to educate employees on effective saving strategies and investment options, empowering them to make informed decisions about their financial health.



Furthermore, our benefits package extends beyond basic health coverage and retirement plans. We provide access to mental health resources, including counseling and therapy services, ensuring that employees have the support they need for their emotional well-being. Additionally, we offer flexible spending accounts (FSAs) for medical expenses, allowing employees to set aside pre-tax dollars for qualified health expenditures.

Culture also understands the importance of work-life balance, so we provide generous paid time off (PTO) policies, including vacation days, sick leave, and personal days, which encourage employees to recharge and maintain their overall health. By integrating these comprehensive benefits into our employee offerings, Culture aims to create a supportive environment that fosters both physical and mental well-being, ultimately enhancing job satisfaction and productivity.



## VACATION AND MEDICAL LEAVE POLICIES

Embodying a foundational ethos of fostering growth and prosperity, Culture stands as a beacon of financial stability and support for its employees. Rooted in the belief of uplifting its workforce, the company contributes significantly to job creation within the local community while ensuring that its employees receive wages and benefits that surpass industry norms. Recognizing the importance of providing living wages, Company sets a minimum starting salary of \$18 per hour for its employees, a noteworthy increase above the State's minimum wage of \$16 per hour. This commitment extends further as the company expands, with an annual increase of approximately 3-4% in the minimum starting rate.

## PAID TIME OFF (PTO) POLICY

In alignment with its belief in the well-being of employees, Company provides full-time employees with paid vacation time, fostering a culture of rest and rejuvenation. While part-time and on-call employees are not eligible for paid vacation, eligible employees can accrue PTO after 90 days of employment. The company encourages the use of vacation time annually, allowing rollover if unused. Requests for PTO should be submitted in



writing, approved in advance by the manager based on business conditions, and unauthorized requests are not valid until signed and approved by management. Upon separation from Company, employees receive payment for any earned and unused vacation time. The versatile use of PTO for personal/sick days, following proper procedures, ensures employee well-being.

**VACATION ACCRUAL FOR HOURLY AND SALARIED EMPLOYEES**

Company values the dedication of its employees and recognizes their service through a structured vacation accrual system. Hourly employees earn 5, 10, or 15 vacation days based on their length of service, while salaried employees enjoy increments from 5 to 20 vacation days, celebrating their commitment and loyalty to the company. The comprehensive compensation and benefits package, including competitive wages and an inclusive vacation policy, underscores Company's commitment to creating a supportive and rewarding workplace for its valued team members.

**HOURLY EMPLOYEE**

Length of Service	Vacation Available
1 – 2-year anniversary	5 days
2 – 5-year anniversary	10 days
5+ year anniversary	15 days

**SALARIED EMPLOYEE**

Length of Service	Vacation Available
1 – 2-year anniversary	5 days
2 – 5-year anniversary	10 days
5 –7-year anniversary	15 days
7+ year anniversary	20 days

### 3. LOCAL WORKFORCE OUTREACH PLAN

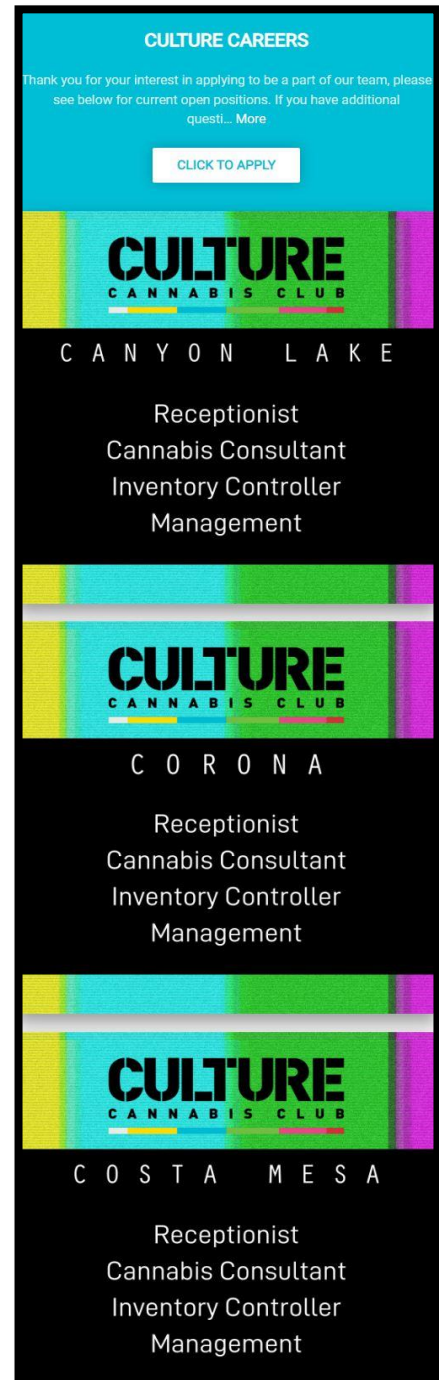
#### SUMMARY OF GOALS

Culture operates compliant, safe, and secure operations in a beautiful, vibrant, and modern facility. Culture's business model focuses on customer service, education, and retention, while marketing campaigns are tasteful and respectful of the community at large. We believe that everyone within the communities we serve can benefit from education about the benefits of safe and moderate cannabis consumption, and Culture has the power to enact real, positive, and meaningful change in the City. Together with the people of Santee, Culture takes its responsibility further to ensure an inclusive ethos, social equity hiring, a robust employee benefit program, partnerships with local businesses, and upward company mobility. These commitments are core Culture standards that enhance the community from deep within. Culture is determined to better the areas we serve by partnering with communities to create sustainable generational change. We favor and support programs with a proven model of holistic development that address the root causes of poverty, addiction, social displacement, and mental illness. **Partnering with Santee's community organizations is not a business transaction for Culture**, it is a deep and lasting connection with a community made of people of all cultures and races.

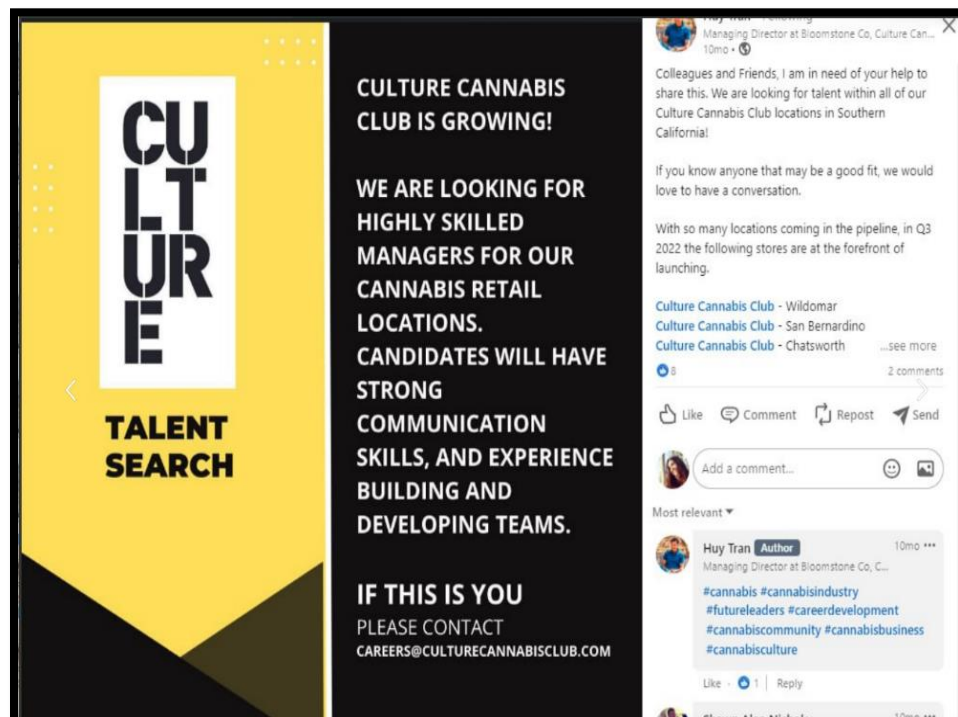
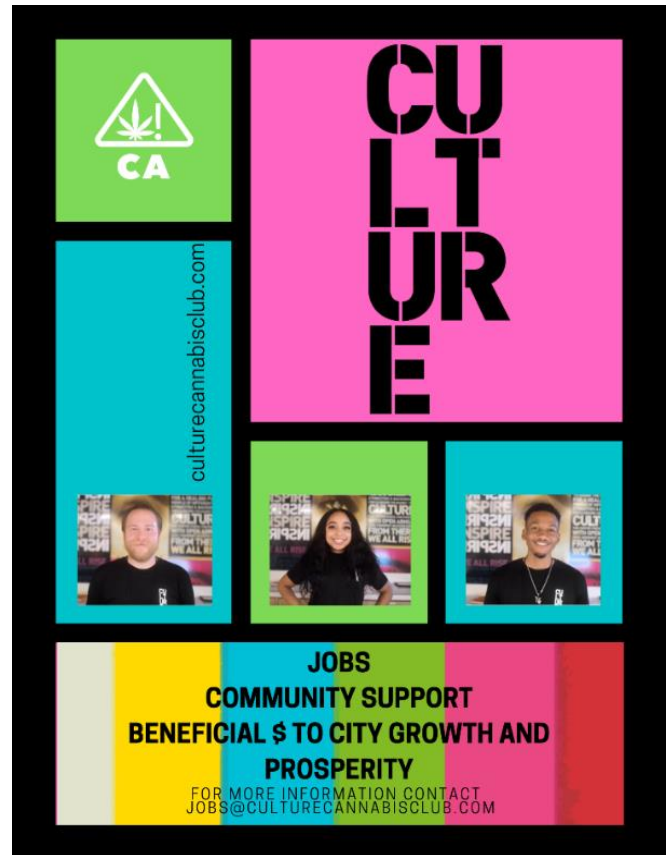
#### 100% LOCAL HIRES

Culture is dedicated to hiring 100% of its workforce from the City of Santee. If this is not possible, Culture will prioritize San Diego County residents. Culture knows that achieving its goal of hiring 100% of its employees from within the City is possible, as Culture has already reached 50% of local staffing in its current stores that are open for less than one year. Culture will shift experienced management and regional directors to open new stores and train staff. As new local staff are trained and confidence is gained in the resident workforce, Culture transitions the temporary managers to the next store opening. Through this system, Culture can implement a robust training program based on the experience of ownership and management, while creating a skilled local workforce that will greatly benefit the City. Culture wants its people to be connected to the success of their city and live a balanced life without unnecessary commute times.

Culture also uses outlets such as Indeed, Craigslist and Zip Recruiter to post advertisements for open positions. Incentives for locals to join our team will be the robust employee benefit



program and opportunities for continuing education. Culture sets its team up for success in several fields, whether they may decide to stay in cannabis or not.





## **ACTION PLAN**

Culture plans to implement a comprehensive outreach strategy to connect with City of Santee residents for open positions. This strategy will include:

- **Local Job Fairs and Community Events:** The Applicant will actively participate in job fairs and community events in Santee to engage with potential candidates. This will provide an opportunity to promote open positions directly to residents.
- **Partnerships with Local Organizations:** The Applicant will collaborate with local workforce development agencies, educational institutions, and community organizations to identify and recruit local talent. These partnerships will help ensure that outreach efforts reach a diverse audience.
- **Targeted Advertising:** Job postings will be advertised through local newspapers, community bulletin boards, and social media platforms focused on Santee residents. This targeted approach will help attract candidates from the community.
- **Internship and Training Programs:** The Applicant plans to establish internship and training programs specifically designed for Santee residents. These programs will provide valuable work experience and skill development, preparing individuals for future employment opportunities.
- **Employee Referral Program:** The Applicant will encourage current employees to refer local candidates for open positions, offering incentives for successful referrals. This not only helps bring in local talent but also fosters a sense of community within the workplace.

Culture will explore events and programs in Santee, California, that could be beneficial for workforce development, including but not limited to:

- **Santee Chamber of Commerce Events:** The Chamber regularly hosts networking events, business expos, and workshops that can connect employers with potential employees and provide training opportunities. Check their calendar for upcoming events.
- **East County Career Center Workshops:** This center offers various job readiness workshops, resume building sessions, and job fairs tailored to local residents. They often have events focusing on skill development and employment resources.
- **Job Fairs:** Local schools and community colleges, such as Grossmont College, frequently host job fairs that attract employers from various industries. These events are great for connecting with local talent.
- **Santee Community Service Events:** Participating in community service events can enhance skills while also networking with other professionals and organizations. Events like park clean-ups or local charity functions provide valuable experiences.



- **Networking Meetups:** Look for local meetups or networking groups focused on specific industries, such as technology, healthcare, or trades. These gatherings can foster connections and offer insight into job opportunities.

For the most current information, Culture will visit the Santee Chamber of Commerce website or check local community bulletin boards and social media for upcoming events related to workforce development.

### **CONTINUING EDUCATION GRANTS**

The company is committed to providing education grants of up to \$5,000 annually to full-time employees enrolled in courses at accredited colleges or universities. The grant allocation will be reviewed each school semester. Employees seeking the grant must submit a request, including proof of enrollment, an expense breakdown, and a personal statement outlining their educational goals. Recipients of the grant are expected to complete their courses with a minimum grade of B or equivalent. Currently, company staff members are enrolled in Cannabis 101 and/or the Budtender Training Course, both offered through online Cannabis Industry Training courses at various colleges in the area, with all associated expenses covered by the company.

### **LABOR AGREEMENTS**

Culture will establish a Labor Peace Agreement (LPA) with UFCW, indicating a commitment to a harmonious and cooperative relationship with its employees.

### **ANTICIPATED MINIMUM PERCENTAGE OF TOTAL ANNUAL PAYROLL HOURS THAT WILL BE PERFORMED AT THE BUSINESS BY CITY OF SANTEE RESIDENTS**

Culture anticipates that a minimum of 60% of total annual payroll hours will be performed by City of Santee residents. This commitment reflects Culture's dedication to contributing to the local workforce and ensuring that job opportunities benefit the community.

## **4. ANNUAL GROSS RECEIPT CONTRIBUTION**

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Culture is committed to making a direct financial contribution to the City of Santee as part of its dedication to community engagement and social responsibility. To support mutual goals with the City, the company has adopted a policy to donate seven percent (7%) of its Gross Receipts. In addition, Culture will contribute an extra one percent (1%) of its Gross Sales to a community benefit fund. This financial commitment underscores Culture's recognition of the importance of giving back to the community it serves.



The one percent (1%) of Gross Sales generated through this initiative will be allocated to the Culture Community program, which supports various community initiatives, charitable organizations, and projects that align with the values and priorities established by both Culture and

the City of Santee. The distribution and management of these funds will be overseen by the Owner in collaboration with the City and various organizations. The Culture Community Board will play a crucial role in ensuring transparency, fairness, and effective allocation of resources to enhance the well-being and development of the local community.

This financial commitment reflects Culture's understanding of the symbiotic relationship between a business and its community. By dedicating a portion of its Gross Receipts as a direct fee to the City, and Gross Sales to community-focused initiatives, Culture aims to contribute meaningfully to the improvement of Santee, creating a positive impact that extends beyond the economic benefits of its operations.

*According to Culture's projections, the company anticipates generating about \$8 million in gross receipts in its first full year of operations. This is expected to result in an estimated contribution of approximately \$560,000 in direct fees to the City of Santee.*

## **SECTION G : PROPOSED SITE PLAN**

### **1. EXISTING SITE INFORMATION**

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#### **A. PHYSICAL ADDRESS**

8781 Cuyamaca Street, Suites A, B, C and D, Santee, CA 92071

#### **B. DESCRIPTION OF EXISTING SITE**

Located at the northeast corner of Cuyamaca Street and Buena Vista Avenue in Santee, California, Culture's proposed site at 8781 Cuyamaca Street hosts 59,555 square feet of commercial space across three parcels. The retail cannabis dispensary will occupy 2,548 square feet within Suites A, B, C, and D, creating a modern space tailored for a premier retail experience.

The property benefits from heavy traffic at the intersection and a daily pedestrian draw from the nearby Medical Center, enhancing its visibility and accessibility. Zoned for General Commercial (GC) use, the site allows for diverse uses, including offices, fast food, gas stations, and other commercial activities along major transportation routes. Strong freeway visibility and consistent traffic flow from the 52 Freeway make it an attractive location for businesses seeking high exposure.

Ample parking is available, with 55 spaces including 2 ADA-compliant spots, ensuring convenience for all customers. A well-planned one-way driveway entrance off Cuyamaca Street facilitates smooth traffic flow and easy access to Culture's units. Upon entering, visitors encounter a one-way drive aisle that guides vehicles efficiently through the shopping center, promoting safety and organization for customers and deliveries.

Additionally, ingress and egress driveways off Buena Vista Avenue enhance accessibility. Clearly defined pedestrian sidewalks provide safe access from the parking area to the building entrances, fostering a welcoming environment for foot traffic. Surrounding landscaping features low-maintenance plants and trees, contributing to the site's aesthetic appeal. The vibrant Cuyamaca Street corridor, filled with shops and services, further attracts a diverse customer base.

#### **BUILDINGS**

The subject property is a single-story retail/commercial building, part of a modest strip mall that caters to local community services and businesses. The building is constructed with a durable tan-colored concrete block facade, indicative of functional, low-maintenance design. Its exterior emphasizes practicality while seamlessly blending into the surrounding commercial landscape.

The building's roof features a sloped design with dark asphalt shingles, adding a traditional, yet subdued aesthetic to the structure.

The storefronts are defined by large glass windows and doors, enhancing visibility into the individual businesses and inviting foot traffic. This transparent design not only offers natural light to the interiors but also allows passersby to easily view services and products offered.



Overall, the building serves as a multi-tenant commercial hub, hosting small businesses that meet every-day needs, such as wireless services, repair shops, and professional offices. Its straightforward design, ample parking, and strategic use of glass storefronts create a functional, community-centered retail environment.

## **PARKING SPACES**

The property includes a front-facing parking lot, designed for customer convenience with marked spaces, including ADA-compliant handicap parking. The lot offers direct access to the businesses, ensuring a smooth transition from vehicle to store. The shopping center provides a total of 76 parking spaces, including 3 ADA-compliant spaces, ensuring accessibility for all visitors.

Culture's retail dispensary, occupying 2,548 square feet within the center, requires 1 parking space per 250 square feet, amounting to a total of 11 spaces needed to meet the parking demand for this business.

There is ample parking available within the shopping center to accommodate the needs of both Culture and the surrounding businesses. The current use of the space is commercial, and Culture's retail dispensary also falls under the commercial category. There is no change in the use of the space, and the existing parking allocation is sufficient to meet the requirements of the dispensary.



## **DRIVEWAYS**

The shopping center located at 8781 Cuyamaca Street offers two primary access points for vehicles. The first is a one-way entrance off Cuyamaca Street, directing traffic into the shopping center via a one-way drive aisle. This aisle facilitates movement from the Cuyamaca Street access point to the central portion of the center, where it transitions into a two-way drive aisle, allowing for full vehicular circulation throughout the remainder of the property. Additionally, a second driveway located along Buena Vista Avenue permits both entry and exit, providing efficient access and egress route for the shopping center's visitors.

## **PEDESTRIAN SIDEWALKS/RIGHTS-OF-WAY**

The development along Buena Vista Street prioritizes pedestrian accessibility and safety, featuring well-designed sidewalks that facilitate seamless movement for residents and visitors alike. These sidewalks flow into a thoughtfully planned path that connects to the pedestrian walkways adjacent to the property units at 8781 Cuyamaca Street shopping center. This connection enhances access to the units, ensuring that all residents can enjoy convenient and safe passage to their homes.

In addition to the main pathways, the site includes walkways alongside the parking lot in front of Culture's units. These walkways are strategically placed to provide easy access for pedestrians while maintaining a clear separation from vehicular traffic. This design promotes a welcoming environment for pedestrians, encouraging them to shop in the area comfortably.

## **C. PHOTOGRAPHS OF EXISTING PROPERTY AND BUILDING**

*[This space intentionally left blank]*







INGRESS FROM CUYAMACA ST



**PARKING ADJACENT FROM CULTURES PROPOSED SUITES**



**INGRESS & EGRESS FROM BUENA VISTA AVE**





#### D. CURRENT SITE USE

Culture’s proposed site is currently occupied by a mix of commercial businesses, providing various services to the local community. The four units—A, B, C, and D—are presently occupied as follows: **Suite D** by **So Cal Water Heating Specialists**, **Suite C** by a **Barber Shop**, **Suite B** by a **Cell Phone & Accessories Store**, and **Suite A** by **Liberty Tax**.

These are the existing uses of the property, and upon the successful licensure of Culture's retail dispensary, these tenants will vacate the premises, allowing Culture to occupy and operate in these units.

#### E. CURRENT SITE USE, EXISTING BUSINESSES, AND ADJACENT PARCELS

The three parcels situated at 8781 Cuyamaca Street, Santee, CA, are currently occupied by a diverse range of businesses that cater to various community needs. These businesses include a **Hair Salon**, a **Realtor Office**, a **Plumbing Service**, **Tax Services**, a **Mini Market**, a **Mexican Food Restaurant**, a **Smog Center**, a **Furniture Upholstery Shop**, and two **Card Store**.

Adjacent to Culture’s proposed retail dispensary, located at **8795 Cuyamaca Street**, is occupied by **Enterprise Car Rental**. Directly behind the proposed location are **residential properties**, creating a mix of commercial and residential use in the area.

Directly across Cuyamaca Street lies another commercial property, featuring businesses such as a **Guitar Store**, a **Dog Grooming Business**, a **Pizza Store**, a **Pharmacy**, a **Nail Salon**, and a **Vietnamese Restaurant**. Additionally, across **Buena Vista Avenue** are **medical facilities**, further contributing to the diverse commercial and service-oriented environment surrounding the proposed location.

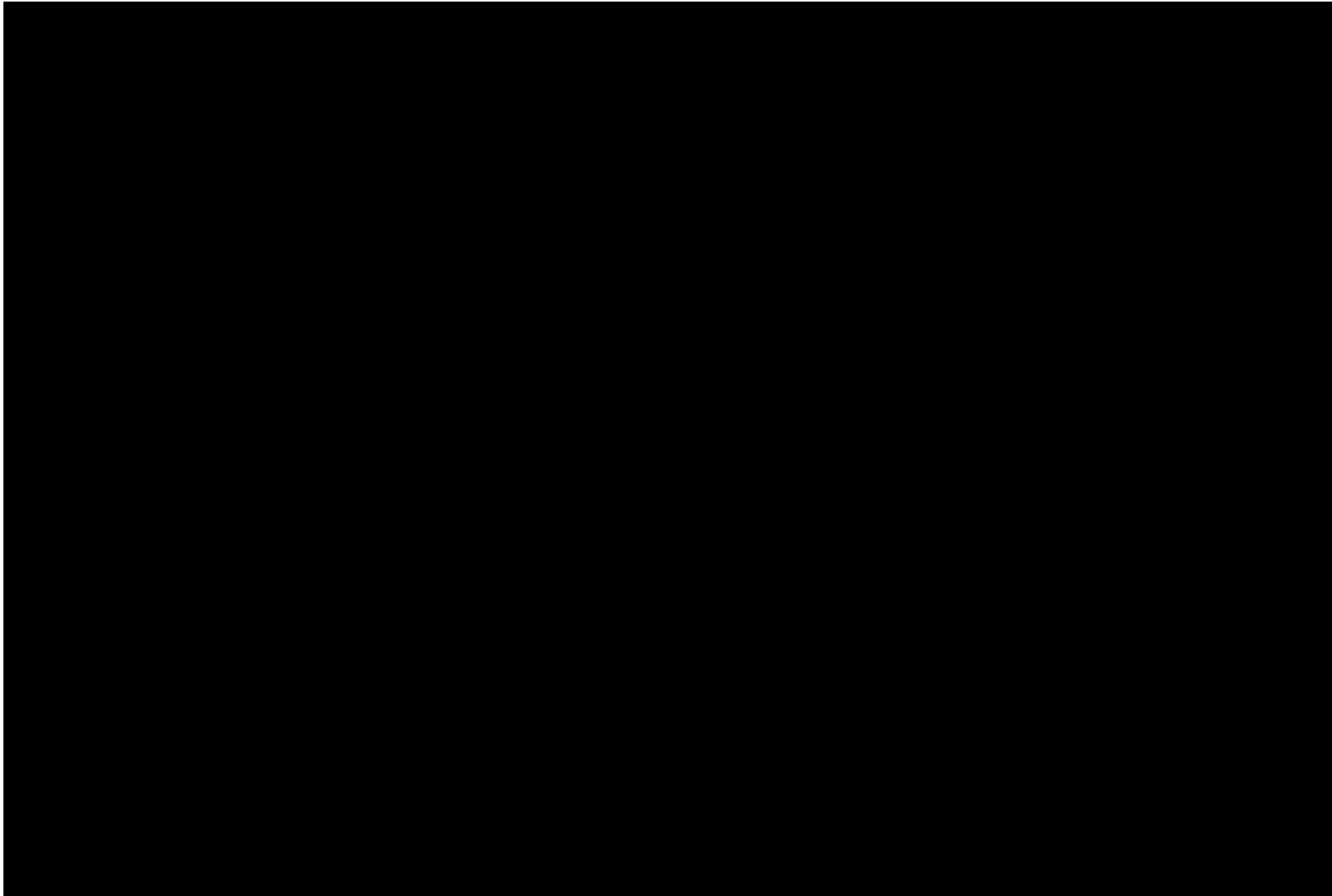
## 2. PROPOSED SITE INFORMATION

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### A. SITE PLAN

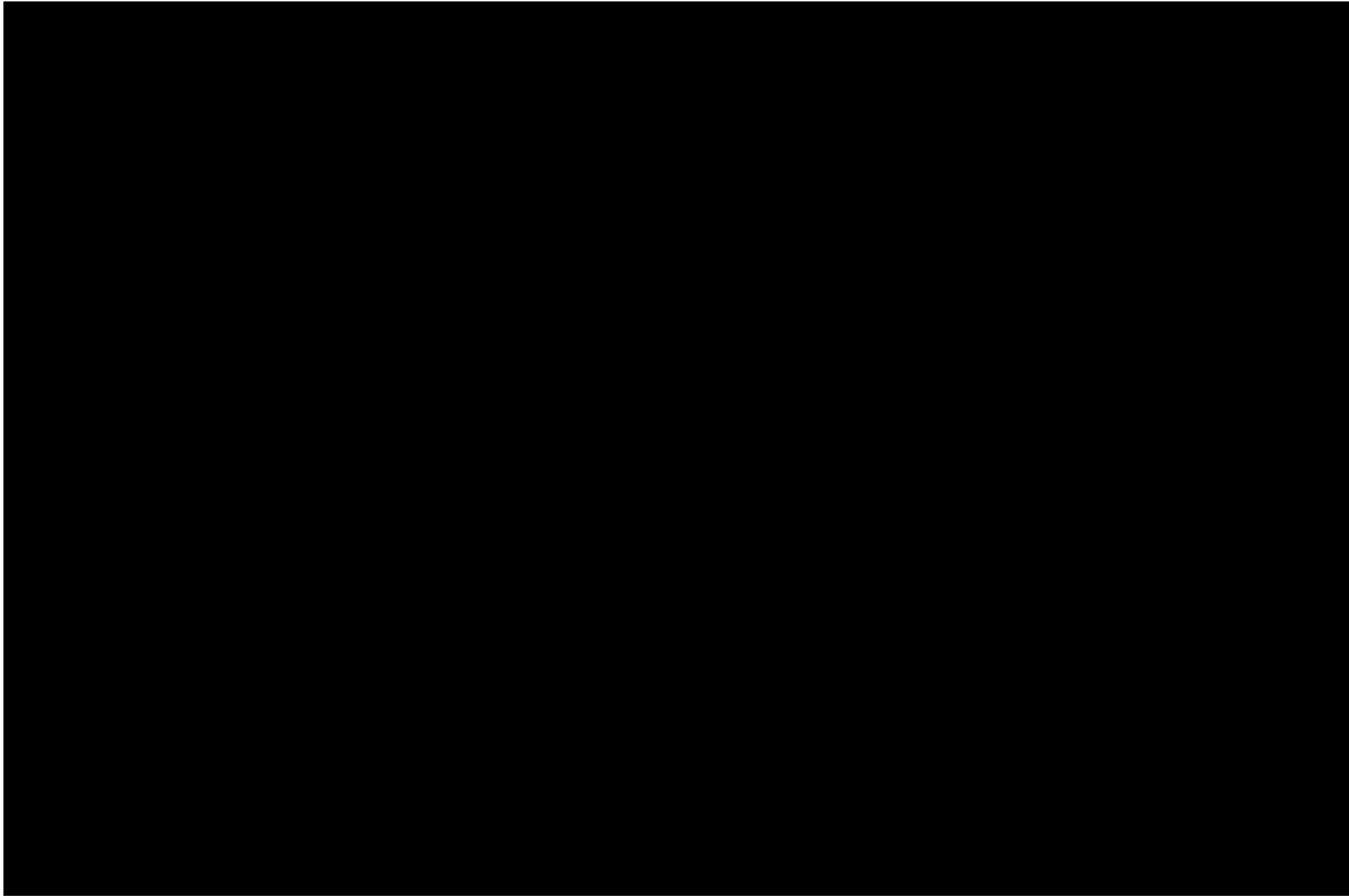
Exterior Depictions	Included
Drawn to Scale	✓
Shows Perimeter Fencing	✓
Driveways	✓
Streets	✓
Property Lines	✓
Buildings	✓
Parking Areas	✓
Outdoor Areas	✓

*[See next page]*











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VIEW 1



VIEW 2



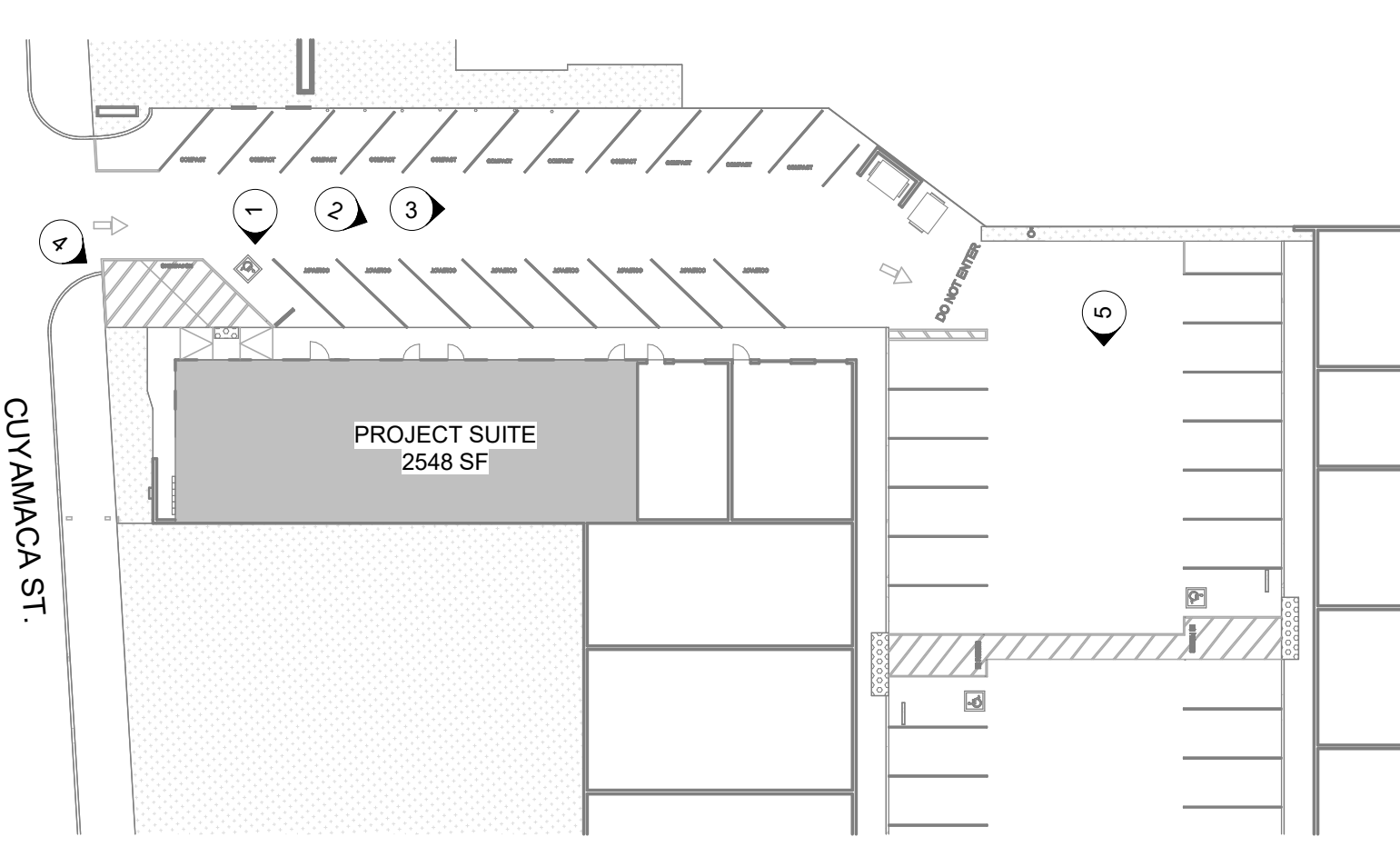
VIEW 3



VIEW 4



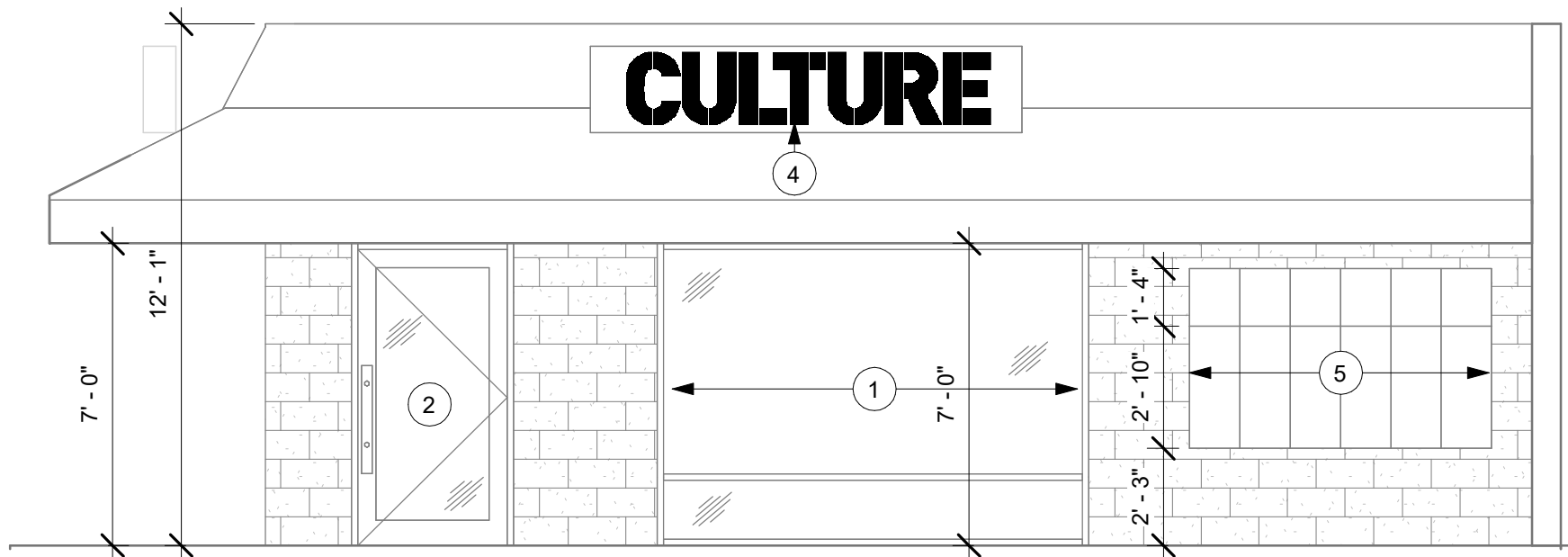
VIEW 5



KEY PLAN

1/32" = 1'-0"

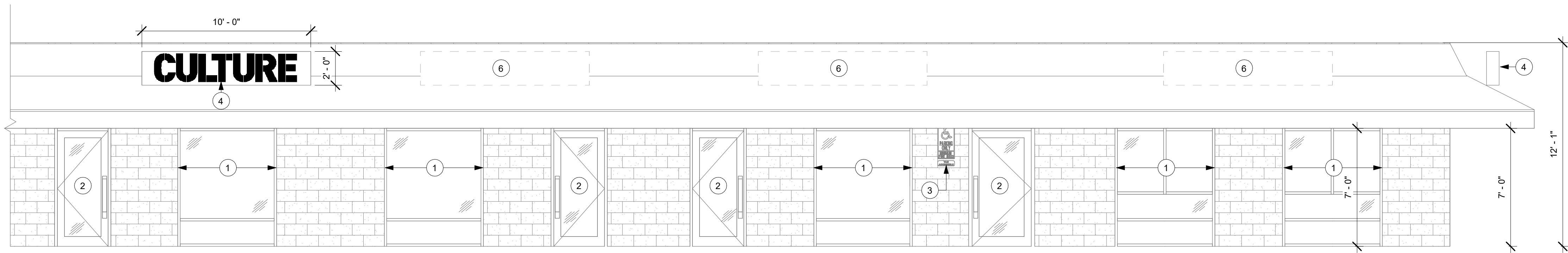
3



WEST ELEVATION

1/4" = 1'-0"

2



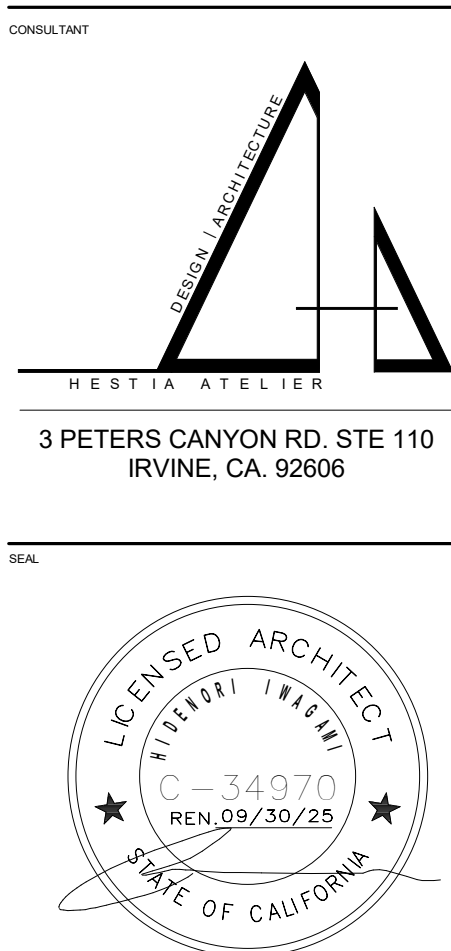
NORTH ELEVATION

1/4" = 1'-0"

1

KEYNOTES

- 1 EXISTING STOREFRONT TO REMAIN AS IS. APPLY FROSTED FILM FROM INTERIOR SIDE
- 2 ENTRY/EXIT DOOR TO REMAIN.
- 3 EXISTING VAN ACCESSIBLE PARKING SIGN TO REMAIN
- 4 EXISTING STORE SIGNAGE TO BE REFACED (UNDER SEPARATE PERMIT)
- 5 EXISTING ELECTRICAL METERS TO REMAIN.
- 6 DEMOLISHED EXISTING STORE SIGNAGE.



CULTURE

8781 CUYAMACA ST.,  
SANTEE, CA 92071

PLANNING PACKAGE 10-23-2024

PROJECT #:  
ISSUE DATE: <10-23-2024>  
DESIGN MANAGER:  
PRODUCTION DESIGNER: AY  
CHECKED BY:

Revision Schedule			
Rev	Date	By	Description

SHEET TITLE:  
BUILDING EXTERIOR  
ELEVATIONS & EXISTING  
CONDITIONS PHOTO  
SCALE: AS SHOWN

SHEET NUMBER:  
A2.0



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EXTERIOR VIEW FROM PLAZA



WEST EXTERIOR ELEVATION

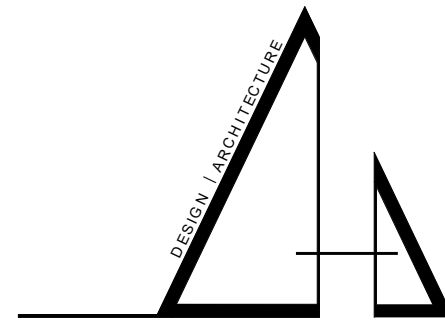


EXTERIOR VIEW FROM STREET



NORTH EXTERIOR ELEVATION

CONSULTANT



3 PETERS CANYON RD. STE 110  
IRVINE, CA. 92606

SEA



CULTURE

8781 CUYAMACA ST.,  
SANTEE, CA 92071

PLANNING PACKAGE 10-23-2024

PROJECT #:

ISSUE DATE: <10-23-2024>

DESIGN MANAGER:

PRODUCTION DESIGNER: AY

CHECKED BY:

Revision Schedule				
Rev	Date	By	Description	

SHEET TITLE:  
BUILDING EXTERIOR  
RENDERINGS

SCALE: AS SHOWN

SHEET NUMBER:

A2.1



## B. DESCRIPTION OF PROPOSED SITE IMPROVEMENTS

### FAÇADE REHABILITATION

The existing exterior will be cleaned and refreshed while maintaining the building's current aesthetic scheme. Culture will ensure that no cannabis or image of or reference to cannabis will be visible on or from outside the facility. Culture will add security cameras, alarms, and signage prohibiting cannabis consumption and entrance by persons under 21. Landscaping and lighting will be repaired or upgraded as needed to meet security requirements and tasteful design aesthetics. The parking lot and walkways will be cleaned, repaired and/or repainted as needed. Although the facility already exists and is consistent with surrounding properties in the area, Culture's updates will promote quality design and improve its overall appearance.



## **BUILDING EXPANSION**

Culture is not proposing any physical expansion of the existing site at 8781 Cuyamaca Street. However, the plan involves combining four existing units—A, B, C, and D—into a single retail space dedicated to the dispensary, totaling 2,548 square feet. This consolidation will optimize the current footprint without altering the building's overall structure or expanding beyond its existing boundaries.

## **PARKING**

The current parking lot available for Culture's use has 76 spaces. This lot will be cleaned and re-paved as needed. Striping will be added to identify each space, including ADA compliant spaces.

## **LANDSCAPING**

Landscaping will be repaired or upgraded as needed to meet security requirements and tasteful design aesthetics.

## **FENCING**

Should the city require a perimeter fence for enhanced security, Culture will proactively ensure full compliance with all relevant regulations, delivering a solution that meets the highest standards.

## **OTHER EXTERIOR SITE IMPROVEMENTS**

None.

## **C. PHOTOS AND RENDERS OF PROPOSED EXTERIOR**

*[See next page]*











### 3. IMPACT OF SITE MODIFICATIONS

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#### **PUBLIC HEALTH & SAFETY**

Our retail dispensary will implement state-of-the-art security measures to ensure a safe environment for customers and the surrounding community. By working closely with local law enforcement and adhering to all regulations, we aim to foster a sense of security and trust, contributing to a more stable neighborhood.

#### **WELFARE & ENVIRONMENTAL QUALITY**

Culture's retail cannabis dispensary is committed to not only providing high-quality products but also to being a responsible steward of the environment. Our approach to sustainability and environmental quality is woven into every aspect of our operations, ensuring that we contribute positively to the ecological well-being of the community and beyond.

#### **SUSTAINABLE SOURCING**

At Culture, we prioritize sustainability by sourcing our cannabis products from environmentally responsible growers who utilize organic farming practices. We believe in supporting local and small-scale farmers who are committed to reducing their carbon footprint and preserving biodiversity. By choosing products that are cultivated with care for the environment, we encourage responsible agricultural practices that contribute to soil health, water conservation, and ecosystem preservation.

## **ENERGY-EFFICIENT OPERATIONS**

Our dispensary will incorporate energy-efficient technologies to minimize our environmental impact. From LED lighting and energy-efficient appliances to smart thermostats and renewable energy sources, we are dedicated to reducing our energy consumption. By designing our retail space with sustainability in mind, we aim to set a standard for environmental responsibility in the cannabis industry.

## **GREEN LANDSCAPING PRACTICES**

The landscaping surrounding our dispensary will be designed with native plants that require minimal irrigation and maintenance, promoting local biodiversity. By incorporating environmentally friendly landscaping, we aim to enhance the aesthetic appeal of the area while supporting local wildlife and reducing water consumption.

## **QUALITY OF LIFE IN THE VICINITY**

Culture's retail cannabis dispensary is poised to be a transformative addition to the community, fostering a positive impact on the quality of life for residents and visitors alike. Our mission is to create a welcoming and inclusive space that not only provides access to high-quality cannabis products but also enriches the surrounding environment.

## **PROMOTING WELLNESS AND EDUCATION**

At Culture, we prioritize education and wellness, offering resources and information to help individuals make informed decisions about cannabis use. Our knowledgeable staff will provide personalized consultations, guiding customers toward products that enhance their well-being, whether for medicinal purposes or recreational enjoyment. By promoting responsible consumption and understanding, we aim to foster a healthier community.

## **CREATING JOB OPPORTUNITIES**

The establishment of our dispensary will generate numerous job opportunities, from retail positions to management roles. We are committed to hiring locally, supporting the economy, and empowering individuals within the community. By investing in our workforce, we contribute to economic stability and provide pathways for career growth in a burgeoning industry.

## **SUPPORTING LOCAL INITIATIVES**

Culture believes in the power of community. We will actively engage with local organizations and initiatives, sponsoring events and programs that promote art, health, and education. By collaborating with local artists and businesses, we will enhance community vibrancy and support the cultural fabric of the area.

## **FOSTERING COMMUNITY CONNECTION**

Culture's retail space will serve as a hub for community engagement, offering a comfortable environment for individuals to gather, share experiences, and learn. We envision hosting workshops, wellness events, and educational seminars that promote dialogue and connection among residents, strengthening community bonds.

In summary, Culture's retail cannabis dispensary will not only provide access to quality products but will also serve as a catalyst for positive change in the community. By promoting wellness, creating jobs, supporting local initiatives, enhancing safety, and fostering connections, we are committed to enriching the quality of life in the vicinity and creating a thriving environment for all.

*Thank You for reading Culture Cannabis Club's  
proposal for a cannabis retail store.*

*We look forward to doing business with the City  
of Santee, we appreciate your consideration!*



## **2. FINANCIAL RESPONSIBILITY, INDEMNITY AND CONSENT TO INSPECTION AGREEMENT**

**CITY OF SANTEE**  
**COMMERCIAL CANNABIS BUSINESS PERMIT APPLICATION**  
**(RETAIL APPLICATIONS)**  
**FINANCIAL RESPONSIBILITY, INDEMNITY AND**  
**CONSENT TO INSPECTION TERMS**  
**(Must be completed by all owners)**

**Dated:** September 11, 2024

I hereby agree to the following terms:

1. I herewith pay the sum of \$25,711 for the application fee for the review and processing of an application for commercial cannabis business permit.
2. The entire fee amount paid to the City of Santee ("City") is non-refundable. There is no guarantee - expressed or implied - that by submitting the application or paying the application fee that I will obtain a permit to operate a commercial cannabis business.
3. All costs incurred by the City in processing said application, including staff time, attorney's fees, Consultant's fees and overhead, shall be funded from the fees paid. This is a personal obligation and shall not be affected by sale or transfer of the property subject to the application, changes in business organization, or any other reason.
4. I acknowledge and agree to the defense, waiver, and indemnification obligations stated in the attached "Agreement on Limitations of City's Liability, and Certifications, Assurances Warranties and Indemnification to City", incorporated herein by reference.
5. The City will promptly notify the Applicant(s) and Owner(s) of any claim, action, or proceeding that is or may be subject to this Agreement on Limitations of City's Liability, and Certifications, Assurances Warranties, and Indemnification to City. The City may, within its unlimited and sole discretion, participate in the defense of any such claim, action, or proceeding.
6. I will fund a deposit account ("Fund") to reimburse the City's cost, including attorney's fees, to defend any claim, action, or proceeding that is or may be subject to the Agreement on Limitations of City's Liability, and Certifications, Assurances Warranties, and Indemnification to City. In the event that any such claim, action, or proceeding is filed against the City, I shall within 30 days of the filing, deposit an initial sum of \$20,000 to the Fund to reimburse the appropriate portion of the City defense costs, as determined by the City in its sole discretion. The Fund shall contain an amount necessary to cover three months' worth of budgeted expenditures by the City relating to the City's defense of the claim, action, or proceeding, including all time to appeal, or as long as expenditures made by the City relating to its defense remain unreimbursed, whichever is later. Once all remaining

Agreement of Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City

and outstanding reimbursements have been paid to the City by me, City shall return any remaining unused portion of the deposit.

7. The City shall have the sole and absolute right to approve any and all counsel employed to defend the City. To the extent the City uses any of its resources to respond to such claim, action or proceeding, or to assist the defense, I will reimburse the City for those costs. Such resources include, but are not limited to, staff time, court costs, City Attorney's time, or any other direct or indirect cost associated with responding to, or assisting in defense of, the claim, action, or proceedings.
8. I consent and expressly allow, authorize, and permit the City, all its departments, agents, and employees, to enter upon and inspect the subject property identified in the application, with or without prior notice, for the purposes of processing this application or inspection or photographing for compliance with all laws, regulations, and conditions placed on land use approvals or the cannabis business permit. No additional permission or consent to enter upon the property is necessary or shall be required. By signing this agreement, I further certify and warrant I am authorized to, and hereby do, consent, and allow such inspections on behalf of each and all Owners of the property and Applicants.
9. I understand that all materials submitted in connection with the application are public records that the City may in accordance with applicable law determine are subject to inspection and copying by members of the public. By filing an application, I agree that the public may, if the City determines the law requires it, inspect and copy these materials and the information contained therein, and that some or all of the materials may be posted on the City's website. For any materials that may be subject to copyright protection, or which may be subject to Sections 5500.1 and 5536.4 of the California Business and Professions Code, by submitting such materials to the City I represent that I have the authority to grant, and hereby grant, the City permission to make the materials available to the public for inspection and copying, whether in hardcopy or electronic format.
10. This Agreement shall constitute a separate agreement from any cannabis business permit approval, and that if the cannabis business permit, in part or in whole, is revoked, invalidated, rendered null or set aside by a court of competent jurisdiction, I agree to be bound by the terms of this Agreement, which shall survive such invalidation, nullification or setting aside.
11. This Agreement shall be construed and enforced in accordance with the laws of the State of California and in any legal action or other proceeding brought by either party to enforce or interpret this Agreement; the appropriate venue is the San Diego County Superior Court.

After review and consideration of all of the foregoing terms and conditions, I agree to be bound by and to fully and timely comply with all of the foregoing terms and conditions, and the attached "Agreement on Limitations of City's Liability, and Certifications, Assurances Warranties and Indemnification to City".

Agreement of Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City

**Applicant(s)/Owner(s):**

DBJ La Mesa Corp (Devon Julian)  
\_\_\_\_\_  
Printed Name

  
\_\_\_\_\_  
Signature

JL Skylegacy Inc. (Julie Le)  
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

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Signature

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Printed Name

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Signature



**Applicant(s)/Owner(s):**

DBJ La Mesa Corp (Devon Julian)  
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

JL Skylegacy Inc. (Julie Le)  
\_\_\_\_\_  
Printed Name

*Julie Le*  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

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Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

### **3. AGREEMENT ON LIMITATIONS OF CITY'S LIABILITY AND INDEMNIFICATION TO CITY**

# **Agreement on Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City**

**(Must be completed by all owners)**

## **A. WAIVER, RELEASE AND HOLD HARMLESS**

I hereby waive, release, and hold harmless the City of Santee ("City") and its City Council, boards and commissions, officers, officials, employees, and agents from any and all actual and alleged claims, losses, damages, injuries, liabilities, costs (including attorney's fees), suits or other expenses which arise out of, or which are in any way relate to the application for a cannabis business permit, the issuance of the cannabis business permit, the process used by the City in making its decision, the enforcement of the conditions of the cannabis business permit, or the cannabis business' operations.

I hereby waive, release and hold harmless the City and its City Council, boards and commissions, officers, officials, employees, and agents from any and all actual and alleged claims, losses, damages, injuries, liabilities, costs (including attorney's fees), suits or other expenses which arise out of, or which are in any way relate to: (1) any repeal or amendment of any provision of the Santee Municipal Code or Zoning Ordinance relating to commercial cannabis activity; or (2) any investigation, arrest or prosecution of me, or the cannabis business' owners, operators, employees, clients or customers, for a violation of state or federal laws, rules or regulations relating to cannabis activities.

## **B. AGREEMENT TO INDEMNIFY**

I shall defend, indemnify, and hold harmless the City and its City Council, boards and commissions, officers, officials, employees, and agents from and against any and all actual and alleged liabilities, demands, claims, losses, damages, injuries, actions or proceedings and costs and expenses incidental thereto (including costs of defense, settlement and attorney's fees), which arise out of, or which are in any way related to i) the requested cannabis business permit and any land use entitlement related thereto, ii) the proceedings undertaken in connection with the approval, denial, or appeal of the requested cannabis business permit and any land use entitlement related thereto, iii) any subsequent approvals or licensing/permits relating to the requested cannabis business permit and any land use entitlement related thereto, iv) the processing of the requested cannabis business permit and any land use entitlement related thereto, v) any amendments to the approvals for the requested cannabis business permit and any land use entitlement related thereto, vi) the City's approval, consideration, analysis, review, issuance, denial or appeal of the cannabis business permit; vii) the City's approval, consideration, analysis, review, issuance, denial or appeal of any land use entitlement related thereto, viii) the City's drafting, adoption and passage of an ordinance, and related resolutions, policies, rules and regulations, allowing for cannabis businesses, ix) the City's drafting, adoption and passage of an ordinance, and related resolutions if necessary in the future regarding any zoning law amendment(s) related to the cannabis business, x) the operation of the cannabis business or activity, xi) the process used by the City in making its decision to approve, consider, analyze, review, issue, or deny, the cannabis business permit or any related land use entitlement, or the appeal of either, xii) City's compliance or failure to comply with applicable laws and regulations or xiii) the alleged violation of any federal, state or

Agreement of Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City

local laws by the cannabis business or any of its officers, employees or agents, except where such liability is caused by the sole negligence or willful misconduct of the City.

City may (but is not obligated to) defend such challenge as City, in its sole discretion, determines appropriate, all at applicant's sole cost and expense. I shall bear any and all losses, damages, injuries, liabilities, costs, and expenses (including, without limitation, staff time and in-house attorney's fees on a fully-loaded basis, attorney's fees for outside legal counsel, expert witness fees, court costs, and other litigation expenses) arising out of or related to any challenge ("Costs"), whether incurred by me, City, or awarded to any third party, and shall pay to the City upon demand any Costs incurred by the City.

**C. OBLIGATIONS INDEPENDENT OF AWARD OF PERMIT, LICENSE, OR ENTITLEMENTS**

The obligations under this Agreement shall apply regardless of whether a cannabis business permit or any related permits or entitlements are issued.

**D. OBLIGATIONS SURVIVE EXPIRATION OF PERMIT, LICENSE, OR ENTITLEMENTS**

The obligations under this Agreement shall survive the expiration of any cannabis business permit or related permit or entitlement issued by the City. No modification of the permit, other approval, change in applicable laws and regulations, or change in processing methods shall alter the applicant's indemnity obligation.

**E. PROSECUTION UNDER FEDERAL LAW**

I understand that I, other applicants, owners, operators, employees, and members of the cannabis business may be subject to prosecution under Federal Laws.



## F. AUTHORIZED TO SIGN

The person(s) whose signature appears below is/(are) authorized to sign this Agreement on behalf of the business, applicant/permittee, and operators, and each of them, if more than one, has submitted this information and all attachments as required by the application process to obtain a cannabis permit from the City of Santee.

I declare under penalty of perjury that the information provided on this form is true and correct and do hereby apply for a permit pursuant to City of Santee Municipal Code, Chapter 7.04, and all other applicable sections of the Municipal Code.

[Signature]  
Applicant Signature

DBJ La Mesa Corp (Devon Julian) - CEO  
Printed Name and Title

Santee Store, LLC  
Name of Business Entity

8781 Cuyamaca St, Suites A, B, C & D, Santee CA 92071  
Address of Permitted Location

9-26-24  
Date

Applicant Signature

JL Skylegacy Inc. (Julie Le) - Director of Administration  
Printed Name and Title

Santee Store, LLC  
Name of Business Entity

8781 Cuyamaca St, Suites A, B, C & D, Santee CA 92071  
Address of Permitted Location

Date

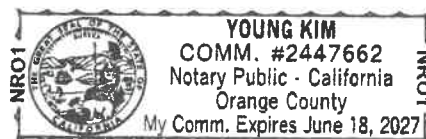
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Orange

Subscribed and sworn to (or affirmed) before me on this 26<sup>th</sup> day of September, 2024, by Devon Julian, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Signature]

(Seal)

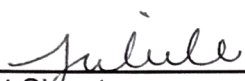


Agreement of Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City

## F. AUTHORIZED TO SIGN

The person(s) whose signature appears below is/(are) authorized to sign this Agreement on behalf of the business, applicant/permittee, and operators, and each of them, if more than one, has submitted this information and all attachments as required by the application process to obtain a cannabis permit from the City of Santee.

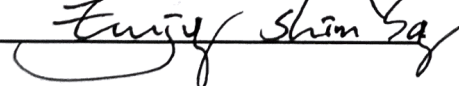
I declare under penalty of perjury that the information provided on this form is true and correct and do hereby apply for a permit pursuant to City of Santee Municipal Code, Chapter 7.04, and all other applicable sections of the Municipal Code.

_____ Applicant Signature	DBJ La Mesa Corp (Devon Julian) - CEO _____ Printed Name and Title
Santee Store, LLC _____ Name of Business Entity	8781 Cuyamaca St, Suites A, B, C & D, Santee CA 92071 _____ Address of Permitted Location
_____ Date	
 _____ Applicant Signature	JL Skylegacy Inc. (Julie Le) - Director of Administration _____ Printed Name and Title
Santee Store, LLC _____ Name of Business Entity	8781 Cuyamaca St, Suites A, B, C & D, Santee CA 92071 _____ Address of Permitted Location
9/23/24 _____ Date	

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Orange

Subscribed and sworn to (or affirmed) before me on this 23rd day of September, 2024, by Julie Le, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature  (Seal)



Agreement of Limitations of City's Liability, and Certifications, Assurances, Warranties, and Indemnification to City

## **5. PROPERTY OWNER CONSENT/LANDLORD AFFIDAVIT**



## City of Santee

10601 Magnolia Ave  
Santee, CA 92071  
Email: cannabisinfo@cityofsanteeca.gov

### PROPERTY OWNER CONSENT/LANDLORD AFFIDAVIT

*Property Owner Consent/Landlord Affidavit is required for all Applications. If the business owner is the same person/entity as the property owner, the business owner must complete, sign and notarize the Property Owner Consent/Landlord Affidavit form. If the property is owned by an entity, the entity owner must complete, sign, and notarize the Property Owner Consent/Landlord Affidavit.*

☒ I certify that I am/we are the record owner(s) of the property at:

8781 Cuyamaca St, Suites A, B, C & D, Santee, CA 92071

Street City State Zip

384-041-53-00 abd 384-041-54-00

Accessor Parcel Number (APN)

and that the information filed is true and correct to the best of my (our) knowledge. I/We, as the owner(s) of the subject property, consent to the filing of this application and use of the property for the purposes described herein. I/We further consent and hereby authorize City representative(s) to enter upon my property for the purpose of examining and inspecting the property in preparation of any reports and/or required environmental review for the processing of the application(s) being filed.

### BY MY SIGNATURE BELOW, I CERTIFY TO EACH OF THE FOLLOWING:

- ☒ I am the property owner or am authorized to act on the property owner's behalf, and the information I have provided above is correct. I acknowledge that I have read and understand the information contained herein.
- ☒ I acknowledge that the proposed commercial cannabis business Santee Store, LLC, dba Culture Cannabis  
Tenant (Corporation/LLC/Partnership/Sole Owner)  
has the legal right to occupy the property, and consent to the business conducting the following commercial cannabis activity at the Property:
- ☐ Retail (Storefront)
  - ☒ Retail (Storefront with Deliver)
  - ☐ Microbusiness (with Retail)
- ☒ I agree to comply with all applicable City Ordinances and State Laws.

### SIGNATURE OF PROPERTY OWNER(S):

RPM SanTan Pad 2, LLC, and CB West Covina, LLC

PRINTED NAME OF PROPERTY OWNER(S)

  
SIGNATURE OF PROPERTY OWNER(S)  
Britt Rand Sanchez, Authorized Signatory


PRINTED NAME OF PROPERTY OWNER(S)

SIGNATURE OF PROPERTY OWNER(S)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Subscribed and sworn to before me this 19th day of August, 2024, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me Renata Bellivier.

**\*NOTARIZATION REQUIRED.** This authorization form will not be valid without notarization. The authorization contained in this form automatically expires upon sale or transfer of title to the Property. If sale or transfer of the Property occurs prior to obtaining a business license, the applicant must resubmit this notarized form with approval of the new legal owner(s) of the Property as well as pay any applicable fees. Property Owner authorization must be signed by all Property Owners of the property identified in the Application. Attach additional pages if necessary.

  
08/19/2024





## **6. PROOF OF INSURANCE OR LETTER OF INSURABILITY FROM THE INSURANCE COMPANY**



10/10/2024

To: City of Santee

From: Alana Long

Broker License Number: 0E44283

Subject: Will serve Letter for Santee Store LLC

Dear City of Santee,

I, Alana Long, commercial insurance broker at IQ Risk Insurance Services have been writing cannabis policies for the last 5 years and can meet the minimum requirements of Insurance for General Liability, Product Liability, Auto Liability, Workers Compensation and Property for Santee Store LLC. We can cover the minimum per occurrence and annual aggregate limits required by your city as follows:

- 1) Liability insurance will be made effective upon issuance of a City license with minimum aggregate limits in an amount not less a limit of no less than \$2,000,000 per occurrence and \$4,000,000 aggregate for bodily injury (including death), personal injury and property damages set forth in SMC;
- 2) Worker's Compensation Insurance to comply with SMC'
- 3) Commercial / Business Auto Liability insurance for bodily injury (including death) and property damage including coverage for owned, non-owned and hired vehicles, with a limit of no less than \$1,000,000 per occurrence set forth in SMC;
- 4) The City of Santee, its City Council and each member thereof, its officers, employees, and agents shall be named as an additional insured on the commercial general liability policy.

IQ Risk Insurance Services is appointed to all off the insurance carriers that are writing cannabis businesses and can meet any of the minimum requirements by any city or state. We have carriers that can also provide high excess limits for these lines of coverage.

Our carriers are all A rated or higher on AM Best Financial rating. We also have a relationship with an admitted carrier writing cannabis accounts.

Please contact me at any time if you have any questions.

Thank you so much,

A handwritten signature in black ink, appearing to read "Alana Long", written over a horizontal line.

Alana Long

8881 Research Drive Irvine CA 92618

Commercial Insurance Broker

IQ Risk

949-536-4466

8881 Research Drive Irvine CA 92618

## **7. PROOF OF CAPITALIZATION**



Culture Stanton Store, Inc.  
1 Corporate Park, Suite 112  
Irvine, CA 92606

Santee Store LLC  
1 Corporate Park, Suite 112  
Irvine, CA 92606

October 23, 2024

RE: Line of Credit

Dear Santee Store LLC:

I am pleased to extend a line of credit to you in support of your business endeavors. Below are the terms and the conditions involved:

Borrower:	Santee Store LLC
Lender:	Culture Stanton Store, Inc.
Purpose:	Cannabis related operations, including retail cannabis dispensaries.
Loan Type:	Line of Credit
Credit Amount:	\$1,000,000
Interest Rate:	WSJ P + 2%
Term:	24 months from date of draw
Conditions:	1) Satisfactory review of business and operations plan 2) Satisfactory review of site plan and proposed location 3) Satisfactory review of equipment and construction plans

**Conditions to Funding:** In addition to the other terms and conditions set forth herein, Lender's obligation to make the Loan is expressly conditioned upon the following:

- a) Borrower shall have executed or shall have caused to be executed and delivered any and all documents required by Lender in connection with the Loan, in form and content satisfactory to Lender in its sole opinion and judgment, including, but not limited to, loan agreement, promissory note, deed of trust, security agreement, assignment of leases, pledge agreement, UCC financing statement and substance indemnity (collectively, the “Loan Documents”).
- b) As of the closing date, there shall not have been any change, adverse and/or detrimental to Lender in the financial condition of Borrower.
- c) All of the representations and warranties contained in the Loan Documents are true and correct.
- d) No materials, documents, or statements provided to Lender by Borrower or any guarantor proves to be misrepresentative, false, and/or misleading in any manner, and no representation or warranty made by Borrower or any guarantor proves to be misrepresentative, false and/or misleading in any manner.

**Governing Law:** The Loan, when made by Lender shall be deemed to have been made in Los Angeles, California, and shall be governed by and construed and enforced in accordance with the Laws of the State of California.

This letter supersedes all prior commitment letters, expressions of interest, and other loan proposals.

Sincerely,

A handwritten signature in cursive script that reads "Devon Julian".

Devon Julian  
Chief Operations Officer  
Culture Stanton Store, Inc.

Santee Store LLC  
1 Corporate Park, Suite 112  
Irvine, CA 92606

October 20, 2024

**RE: Line of Credit**

Dear Santee Store LLC:

I am pleased to extend a line of credit to you in support of your business endeavors. Below are the terms and the conditions involved:

Borrower:	Santee Store LLC
Lender:	Tom Anderson/Clover Leaf Road LLC
Purpose:	Cannabis related operations, including retail cannabis dispensaries.
Loan Type:	Line of Credit
Credit Amount:	\$1,600,000
Interest Rate:	WSJ P + 2%
Term:	24 months from date of draw
Conditions:	1) Satisfactory review of business and operations plan 2) Satisfactory review of site plan and proposed location 3) Satisfactory review of equipment and construction plans

**Conditions to Funding:** In addition to the other terms and conditions set forth herein, Lender's obligation to make the Loan is expressly conditioned upon the following:

- a) Borrower shall have executed or shall have caused to be executed and delivered any and all documents required by Lender in connection with the Loan, in form and content satisfactory to Lender in its sole opinion and judgment, including, but not limited to, loan agreement, promissory note, deed of trust, security agreement, assignment of leases, pledge agreement, UCC financing statement and substance indemnity (collectively, the "Loan Documents").

- b) As of the closing date, there shall not have been any change, adverse and/or detrimental to Lender in the financial condition of Borrower.
- c) All of the representations and warranties contained in the Loan Documents are true and correct.
- d) No materials, documents, or statements provided to Lender by Borrower or any guarantor proves to be misrepresentative, false, and/or misleading in any manner, and no representation or warranty made by Borrower or any guarantor proves to be misrepresentative, false and/or misleading in any manner.

**Governing Law:** The Loan, when made by Lender shall be deemed to have been made in Los Angeles, California, and shall be governed by and construed and enforced in accordance with the Laws of the State of California.

This letter supersedes all prior commitment letters, expressions of interest, and other loan proposals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Anderson', is written over a horizontal line.

Tom Anderson  
Managing Member, Clover Leaf Road LLC



## **8. PROOF OF ZONING VERIFICATION LETTER REQUEST**

Plan Number: ZVL-2024-0010

[Plan Details](#) | [Tab Elements](#) | [Main Menu](#)

Type:

Cannabis Zoning Verification Letter

Status:

In Review

Project Name:

IVR Number:

2886

Applied Date:

09/16/2024

Expiration Date:

District:

\_Santee

Assigned To:

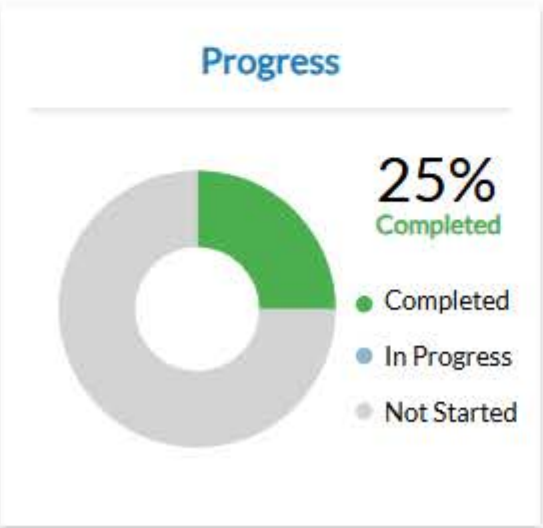
Lindebrekke, Rachael

Completion Date:

Description:

Cannabis Retail dispensary zoning verification letter request.

- Summary
- Locations
- Fees
- Reviews
- Attachments
- Contacts
- Sub-Records



Fees

Workflow

Available Actions

No Actions



Santee, CA

Order Number: 9362

Tuesday, September 17, 2024

Invoice #	Item Description	Quantity	Unit Price	Total Price
INV-00006287	NONE	1	\$267.00	\$267.00
			Item Total:	\$267.00
			Convenience Fee:	\$1.87
			Order Total:	\$268.87

Continue to site (<https://santeeca-energovweb.tylerhost.net/apps/selfservice#/paymentsuccess?invoiceNumber=9362>)