

Trulieve of Maricopa Project Narrative

About Trulieve

Trulieve is an industry leading, vertically integrated cannabis company and multi-state operator in the U.S., with established hubs in the Northeast, Southeast, and Southwest, anchored by leading market positions in Arizona, Florida, and Pennsylvania. By providing innovative, high-quality products across our brand portfolio, Trulieve delivers optimal customer experiences and increases access to cannabis, helping patients and customers to live without limits.

Formerly known as Harvest Health & Recreation, founded here in Arizona in 2011, Trulieve is the largest retail marijuana operator in the state, with 20 retail locations open in Arizona and several cultivation and manufacturing facilities located throughout the state. Trulieve employs 850 Arizonans, this dispensary, once operational, will employ approximately 25 local residents.

Since its inception, Trulieve has made many successful contributions to the communities we serve. Trulieve is actively supporting cancer research and cancer survivor groups, The Brett Hundley Foundation for Epilepsy, Disabled American Veterans, as well as supporting and partnering with local food banks.

Proposed Project Specifications

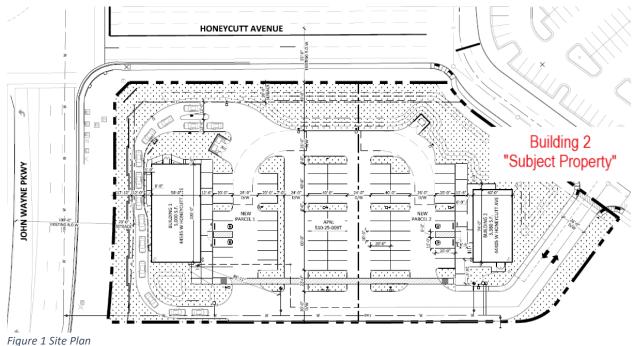
Trulieve desires to open a retail dispensary by building out the existing vacant lot located at the Southeast Corner of West Honeycutt Avenue and North John Wayne Parkway in Maricopa, Arizona. The proposed building will be approximately 3,536 square feet, with approximately 28 parking spots. *See* Exhibit 1 Site Plan. The dispensary will be operational between the allowable hours of 8:00am and 10:00pm. There will be no delivery service or drive-thru services offered from or at the facility.

The goals and objectives of this project include:

- Breathe new life into an existing vacant lot.
- Serve a growing demand in an area where population is growing significantly, yet dispensaries are presently not operating.
- Provide a new image for this prominent corner of the neighborhood with building design elements.
- Bring a marijuana dispensary to an area of the state where demand is high and growing, noting that 64% of the voting population supported Proposition 207 legalizing the sale of marijuana for adult use purposes in the November 2020 election.

The property is located in a growing commercial corridor in the City of Maricopa. See Figure 1 Location Map. Immediately north of the property vacant land. To the northwest is the Exceptional Community Hospital, compatible with the use and makes the dispensary well positioned for providing medical cannabis to healthcare patients. To the east is vacant land that is currently under consideration for development. To the west is vacant land that is well situated for further development of complementary uses to the subject property. To the south is vacant land that is intended to be further developed as part of the project.





This is a request for a CUP in accordance with Sections 18.150.060 and 18.120.160 of the City of Maricopa Zoning Ordinance which requires certain findings to grant a conditional use permit. Below is an explanation of how this proposal addresses the required findings.

REQUIRED FINDINGS

A. Is Allowed Under The Zoning

The property is zoned General Commercial (GC). GC zoning allows medical marijuana facilities in accordance with Section 18.120.160 of the City of Maricopa Zoning Ordinance which includes required separation distances from certain protected uses as follows:

| Protected Use | Distance |
|--|------------|
| Residentially zoned Property | 250 feet |
| Day Care Centers, Public or Private Parks, Civic Facilities, Religious | 500 feet |
| Facilities, Group & Residential Care Home | |
| Another Marijuana Qualifying Facility, Public/Private/Charter | 1,500 feet |
| School | |

This project will be constructed and operated within all applicable laws, codes and ordinances, and meets all of the separation criteria from protected uses.

Protected Use/Radius Study

As part of the due diligence in selecting this site, we conducted a radius study to ensure we would not be encroaching on any protected uses in the area and that the property would comply with any and all separation requirements in place by the ordinance. The radius study showed we were more than the



required distance from any of the protected uses. A map showing the results of the radius study is shown in Figure 2 Radius Study Map below.

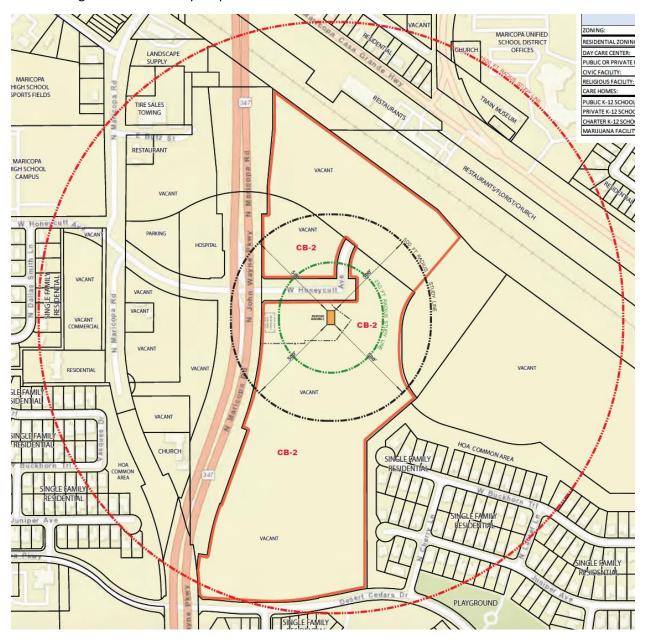


Figure 2 Radius Study Map

B. Is Consistent with the General Plan

The General Plan designation for the property is Employment which allows for retail uses. This project is proposing development on vacant land that is in an area that is designated as a growth area by the General Plan. This use will be a retail use, add employment and provide additional tax revenue to the City.



C. Location is Consistent with the Purpose of the Zoning District

The location of the property is in an area that is meant for commercial and retail development because of its location near N. John Wayne Parkway which is designated as a Parkway and Honeycutt Road which is designated as a minor arterial.

D. Is Not Injurious to the Neighborhood

The proposed project will not be detrimental to the property or the neighborhood.

1. Odor/Dust/Noise

Trulieve will install odor control systems, as typically required by municipalities, for dispensaries to control odors. We anticipate using an ionization air filtration system at this retail dispensary. As this technology continually evolves, we will select the most effective tool for air filtration at the time of construction. The noise level of a dispensary is no different than any other commercial use that takes place completely inside the building. There will be no added odor, noise or dust as a result of approving this use permit. All marijuana products will be packaged off-site and will remain in sealed packaging while on the property. This eliminates any potential odor coming from the facility to surrounding properties.

2. Product Destruction

When necessary, the marijuana green waste process will be completed by each location on a weekly basis. Waste inventory must be physically quarantined with a "Not For Retail Sale" sign. All destruction shall be logged and take place on camera, in the presence of store leadership. Upon destruction, marijuana green waste will be placed in a designated commercial waste bin for removal from the facility.

3. Control of Disruptive Behavior/Security

Trulieve is committed to the peace of mind of its staff, customers, patients, and community members. To that end, security is of utmost importance to the Dispensary team, and we will ensure that the Dispensary is highly secure. Use of the product is not allowed on property or in a public place.

Dispensaries have not created security problems for neighborhoods, in fact, the enhanced security measures, cameras and monitoring has made areas around dispensaries safer.

A security floor plan, indicating locations of cameras, panic buttons, and other specific security measures will be provided to the Maricopa Police Department.

Management Responsibilities

Management (e.g., managers, assistance managers, and all persons-in-charge) are responsible for communicating security procedures to employees, training them on security policies and procedures, and ensuring that the policies procedures are understood and followed.

Security Operations Center (SOC)

The Trulieve SOC is staffed at all times and is responsible for the following:

- Conducting routine security system health diagnostics and testing
- Ensuring all intrusion alarms are activated each day at the close of business
- Conducting video escorts of employees during opening and closing time periods



- Serving as the primary initial point of contact for alarm monitoring companies and coordinating law enforcement response if necessary
- Retrieving archived video, access control logs and alarm activations during investigations
- Monitoring all company vehicles through a real time web-based GPS tracking and camera application

Video Surveillance System

The Dispensary will be under 24-hour recorded video surveillance capable of capturing and recording clear and certain identification of any person entering or exiting.

Surveillance systems will have full field digital view of the following areas:

- A well-lit exterior of entire building at all times
- Outdoor cameras that view the entire perimeter of the building
- Secured trash and recycling areas
- Multiple angles of video surveillance for entire interior facility, with the exception of restrooms
- Video cameras will have a clear recording resolution and will record 24 hours/day. All video footage is stored via off-site cloud and retained for 30 days as required by Arizona state law.
- Cameras and recording equipment will have sufficient battery backup to support at least 15 minutes of recording in the event of a power outage
- The video surveillance will be hard wired to an on-site computer, which will be used to store all
 video recordings and will have the capacity to store recordings for the previous 30 days. This
 computer will be secured on-site within a locked space. Additionally, all live feed and recorded
 video can be accessed remotely through a web-based application by security and leadership
 staff
- If necessary, during investigations, still images and recorded video can be immediately shared with law enforcement
- A failure notification system will provide an audible and visual notification of any failure of the surveillance system
- The general manager's office shall store the onsite hard drive for recorded surveillance

Exterior Building Security

The following security protocols will ensure that the exterior of the dispensary is secure while providing a safe, welcoming, and professional environment:

- Video cameras will provide exterior coverage of all entrances and windows and any activities occurring outside or adjacent to the building
- During business hours, management will be charged with monitoring the parking lot and area surrounding the dispensary, ensuring safe ingress and egress to patients' transportation, and strictly enforcing loitering policies
- Exterior signage will be prominently displayed stating "Loitering prohibited. The use of marijuana, alcohol or any controlled substance is prohibited inside or outside of this facility."
- A greeter will be posted inside the room accessed by the patient entrance to perform an initial
 examination of the patient's credentials and ask patients to remove hats and/or sunglasses
 (except for religious headwear), if necessary, to facilitate the video capture for identification of
 the patient or patron. All customers must be 21 or older.
 - All Trulieve Arizona dispensaries are secured by video surveillance, and diligent on-site staff to ensure loitering does not take place. Trulieve internal security will undertake a



threat vulnerability assessment to determine if or when on-site security guards are necessary.

- Entrances will be protected with electronically controlled locking mechanisms that automatically lock entrances and prevent entrance to the facility without proper authorization
- Exterior lighting will be installed to facilitate surveillance within the guidelines provided by the city code

Interior Building Security

The following security protocols will ensure that the interior of the dispensary is secure for patients, customers and employees:

- Video cameras, which will operate on a digital IP system, will provide interior coverage of all entrances and windows, reception area, each point-of-sale location, and the vault
- At least one call-up monitor nineteen inches or larger will be accessible to the onsite manager
- Audible and silent alarms will alert the breach of all entrances and windows and provide motiondetection coverage for the entire dispensary
- The dispensary will install and maintain working panic buttons in the interior of the dispensary. All Facility Agents within the dispensary building will be trained to use and will have access to multiple panic buttons throughout the site. Facility Agents will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including threatening conduct, criminal invasion, and other security emergencies. The general manager will ensure that all interior panic buttons are properly functioning at all times.
- When pressed, panic buttons will immediately contact local law enforcement agencies. Panic buttons are different from the alarm system in that they immediately alert law enforcement.
 The alarm system will be monitored by a professional alarm company who often times will be the first response before alerting law enforcement

Access Control

The dispensary will have an enclosed, locked IT and security system location with no visible outside markings. The interior operations will be monitored such that entry into the building is regulated, and a complete access control system will be installed. The system will prevent entrance to the building, as well as limit access to employee-only areas through the use of key fob/electronic access and security doors at points of entry.

Authorized Access

The dispensary will provide for the accurate and continuous identification of individuals authorized to enter the dispensary. The dispensary will restrict access to the areas of the dispensary that store marijuana to authorized individuals only. All access control logs are archived and can be queried during investigations.

Before dispensing marijuana to a customer, qualified patient or caregiver, the Facility Agent will enter the patient's or caregiver's registry identification number on the patient's or caregiver's registry identification card into the Electronic Verification System and verify the validity of the registry identification card and age of recreational customers. Access to the dispensary building will be denied to any individual not providing the credentials listed above and satisfactorily proving eligibility and authorization to enter.



Controls to Detect and Prevent Unauthorized Access

Access to the controlled areas will be limited to state licensed Facility Agents, and when needed, licensed contractors.

To ensure the safety of our employees, customers, and patients, only state licensed Facility Agents will have access to areas where marijuana is packaged and stored. These secure areas will have locked doors and key fob/electronic access at points of entry.

Security Equipment

The dispensary will have security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radiofrequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.

Intrusion Detection

The dispensary will comply with all state and local rules and regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion into the dispensary building. In addition, during business hours, the manager on duty will ensure that all electronically restricted access-controlled doors are properly secured with the alarm armed to notify of any unauthorized intrusion. During non-business hours, the manager on duty will ensure that the security system is armed and operational by securing all interior doors, electronically restricted access doors, and the exterior door, and setting the security system by way of a confidential access code.

Loitering

The dispensary will provide for the accurate and continuous identification of individuals authorized to enter the dispensary. The dispensary will post signs stating "no loitering" throughout the parking area utilized by patrons. Additional signage will placed on the property prohibiting the use of marijuana, alcohol, or any other controlled substance inside or outside of the location. Signs shall be placed in locations visible to all patrons. Trulieve management will monitor the public areas around the dispensary building to ensure no loitering is taking place and escort individuals away from the public areas around the dispensary, or if necessary, contact law enforcement for assistance, in the event any loitering occurs.

Product Security

The dispensary will ensure marijuana products are safe for customer and patient use by ensuring that products are properly procured, tracked, documented, stored, tested, packaged, labeled, inventoried, and that Facility Agents are properly trained to carry out all of these critical procedures. In addition to ensuring that customers and patients have access to safe products, our responsibility to keep these products out of the hands of unauthorized individuals is a critical part of our product safety plan and our stewardship to the community.

Safe product storage begins with strong Chain of Custody and inventory procedures. This begins at a state licensed cultivation site and ends with a final sale; a protocol will be in place for product recalls or shelf-life expiration. Enhanced secure storage, inventory procedures, and electronic monitoring systems, including real time access of data upon request, will serve as checks and balances throughout the Chain



of Custody procedures for all products. Written documentation shall accompany all products being transported. Storage area will not exceed 500sf.

Employee Background Checks

All employees go through a comprehensive background check and must receive certification from the state in the form of a "Facility Agent" card to work on the sales floor as a dispensary agent. As part of the state processing, the agent will have to submit a fingerprint clearance card for the purpose of obtaining a state and federal criminal records check pursuant to section 41-1750 and Public Law 92-544.

All patrons and employees must be at least 21 years of age, unless a person under 21 is accompanied by an adult or those medical marijuana card holders who may be under the age of 21.

Trulieve security compliance measures exceed all requirements of state law and local ordinances.

Local security contact for Trulieve of Maricopa: James Grisham, Area Security Manager james.grisham@trulieve.com 520.940.2625

4. No Significant Increase in Vehicular or Pedestrian Traffic

The main access point for the property will be from W. Honeycutt Avenue just east of the major intersection of W. Honeycutt Avenue and N. John Wayne Parkway. These access points keep traffic away from the neighborhood and focused on the major arterial roadway network. With respect to traffic generation, the dispensary will generate traffic comparable to other retail uses that are allowed in this zoning category.

5. Compatibility

The dispensary is a retail use that will be surrounded by other retail type business that are allowed in the General Commercial zoning district. This use is compatible with the neighborhood, and it will provide additional security over and above what another retail user would provide.

E. There Will Be Adequate Infrastructure

We believe that there will be adequate infrastructure to service this project and the impact on public services will be minimal.

F. Is Necessary and Compatible With Neighborhood

The dispensary will be in a commercial area and will be compatible with the surrounding uses. It will meet the needs of the community where there is growing demand for medical marijuana but there are currently no dispensaries to meet this demand.

Operational Compliance with local and state laws and regulations

Trulieve of Maricopa will strictly follow all provisions of Arizona state law, under the medical and adult use statutes (A.R.S. Title 36, Chapter 28.1 and A.R.S. Title 36, Chapter 28.2, respectively), as well as all provisions of the Maricopa City Code, specifically sections 18.120.160, Medical Marijuana uses and Chapter 8.40, Recreational Marijuana. All Trulieve locations across the state are compliant with local and state laws and regulations, including being licensed by the Arizona Department of Health Services.



Hours of Operation

As allowed by local ordinance and state law, Trulieve of Maricopa will operate between the hours of 8:00am and 10:00pm.

Address

Southeast Corner of West Honeycutt Avenue and North John Wayne Parkway in Maricopa, Arizona

Applicable APN: 510-25-009Q



Exhibit 1
Site Plan

