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# **Security System Narrative**

**Union Twist, LLC**

**Dispensary – 1158 Beacon Street, Newton**

**DRAFT**

**March 3<sup>rd</sup>, 2019**

## Private & Confidential

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## I. Introduction

I represent Union Twist LLC (UT) as their security consultant. I am submitting the following proposed security plan on behalf of UT. These plans were developed in accordance with 935 CMR 500.000 Cannabis Control Commission regulations, City of Newton Ordinances, and industry best practices using the principles of Crime Prevention Through Environmental Design (CPTED), and my 33+ years of law enforcement and security experience. I have provided security consulting services for the past years to numerous clients in various industries including cannabis companies in Massachusetts.

Our proposal is to locate a Marijuana Retail Establishment at 1158 Beacon Street, Newton Massachusetts. I believe that the security plan outlined below meets all the requirements of the city of Newton and will ensure a minimal impact on public safety services of Newton.

The security system for Union Twist LLC (UT) dispensary in Newton, MA is designed to provide a safe and secure environment for staff, the public, and storage/handling of Marijuana in compliance with Code of Massachusetts Regulations 935 CMR 500.110.

Kroll also considered security principles of Crime Prevention Through Environmental Design (CPTED), Concentric Circles of Protection, and Integrated Design when evaluating opportunities to deter a threat from entering and circulating within the building envelope.

CPTED is a concept that utilizes planned passive resources such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements to reduce vulnerability to crime. The key concepts of CPTED include:

- Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space.
- Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility.
- Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders. This sends the message that would-be-offenders will be identified.

The concept of “Concentric Circles of Protection” is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements, becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders or other unauthorized individuals.

The Integrated Design Philosophy establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for using this concept is that architectural, operational and electronic elements must be implemented to complement one another; thereby creating collaboration between them that results in a strong security program. No one element of the group can stand-alone or operate independently and provide adequate protection. Specifics of the elements used include:

- Architectural Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, and control barriers.
- Operational Security measures address items such as staff and public access control, staffing, monitoring and administration of systems.
- Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.

## **II. Security Measures**

Security measures for the UT dispensary consist of both physical barriers and electronic systems that work in concert to provide a robust security program. These measures include:

- Secure Door and Window Hardware
- Security Mesh
- Primary Intrusion Alarm System
- Backup Intrusion Alarm System
- Video Surveillance System
- Access Control System
- Door Interlock System
- Door Intercom System

### **Physical Security Measures**

Measures will be employed by UT that ensure a secure physical perimeter is provided around their entire tenant space as well as walls surrounding the Secure Storage/Limited Access Area (LAA). Where concrete block construction is not used, security mesh and plywood will be utilized to harden ceiling and perimeter walls of the LAA to deter penetration from adjacent space.

Perimeter doors and designated interior doors separating dispensary functions will be provided with locking hardware which will remain secure except when accessed by authorized persons. Perimeter glass for the dispensary is limited to the main entry and exit doors, a Security Room window, and two second floor windows. All perimeter glass will be non-operable and will have laminated glass or security mesh inside to prevent intrusion. A laminated glass transaction window in the Security Room facing the Entry Vestibule will allow security personnel to safely validate persons before they are permitted to enter the Sales Floor.

The layout will allow several options for deliveries.

### **Intrusion Alarm Systems**

Intrusion detection for the UT dispensary is comprised of two independent commercial-grade alarm systems – a primary and a backup – to ensure an intrusion will be detected and reported should a failure of either system occur. The primary alarm system (PAS) and the backup alarm system (BAS) will be installed, serviced and monitored by separate security vendors to ensure redundancy. Control equipment for the PAS and BAS will be located in the Security Room, which will have restricted access.

Perimeter detection of an intrusion is provided using door contacts on perimeter doors and glass break detection for perimeter glass. Interior intrusion detection is provided by motion detection throughout the dispensary and in the LAA. In addition to intrusion devices, hold-up/panic alarms will be provided at point of sale locations within the sales area, in the Security Room and in the LAA.

The intrusion alarm systems will be controlled by numeric keypad arming stations located inside the main entry and exit doors. Keypads will display system armed/disarmed status, status of security devices and any trouble notifications. Authorized users will be issued unique arm/disarm codes to identify who armed or disarmed the systems at a given time. A special duress alarm code will be provided at each PAS and BAS keypad arming station to notify law-enforcement that an authorized user has been forced by an intruder to disarm an alarm system.

The PAS and BAS provide separate detection of intrusion for all perimeter door and window contacts, glass break detectors and motion detectors to ensure a device failure on one system will not compromise intrusion detection by the other. Both systems will have backup batteries for continued operation during power failures for up to twenty-four hours.

### **Video Surveillance System**

The video surveillance system (VSS) is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of security video. VSS head-end equipment will be located in the Security Room to ensure access is restricted and limited to the security function. Exterior cameras will be located around the perimeter of the building, at doors and the side driveway area to monitor and record activity around the dispensary tenant space. Interior cameras will be provided in dispensary areas and in the LAA. The system will provide monitoring and recording of all cameras to aid in identifying all who enter or exit the dispensary and areas where controlled products will be stored, processed, handled and sold. Monitoring and operation of the VSS will be provided in the Security Room.

The VSS will record cameras for a minimum of 90 days and retain (at minimum) the last 24 hours for immediate retrieval and playback. The VSS will save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will have an uninterruptible power source for continued operation during a power failure for a minimum of four hours; or for thirty minutes should an emergency backup generator be provided for extended backup power.

### **Access Control System**

A proximity card access control system (ACS) will be provided at perimeter and designated interior doors, including the LAA door, to limit access only to persons issued a valid access card and within their allotted day and time schedule. Each person will be authorized to enter only those doors required in the performance of their duties. Persons accessing the LAA will be required to present a valid access card and enter a unique personally identifiable numeric code before entry is granted. All user activity will be logged by the ACS. Vandalizing or tampering with the ACS card reader on the unsecure side of a door will not unlock the door. The ACS controller will be located in the Security Room and be provided with backup power supply to ensure operation during a power failure for a minimum of four hours; or for thirty minutes in the event an emergency generator is provided for extended backup power.

All authorized personnel will be issued a photo ID badge that also acts as the card to access the controlled doors. Personnel names and photos will be printed on the card. All personnel will be

required to wear their photo ID badge at all times while on the premises. The cards will employ contactless smartcard technology with unique card numbers. Only cards programmed into the ACS will work at the dispensary. The manufacturer will track the individual card numbers to ensure card numbers are not duplicated. These card security measures will help ensure that only authorized personnel will have access to the dispensary facility.

The access control system will also include a visitor management function that will record visitors to the dispensary facility, store personal information, and print visitor badges.

### **Door Intercom System**

An intercom system is provided to allow Security Room personnel to communicate with persons at the Exterior Entry Vestibule door should the door be locked during business hours for any reason. The intercom system will allow the entry door to be remotely unlocked from the Security Room to allow vetted persons into the Entry Vestibule.

### **Door Interlock System**

An exterior and interior door at entry and exit points of the dispensary form a vestibule which will be configured similar as a mantrap to ensure authorized persons entering or exiting cannot allow an unauthorized person into the dispensary Sales Floor. The interlocked doors are controlled such that only one vestibule door can be opened at a given time. Doors are logically-controlled by a controller located in the Security Room. Door release buttons are provided at the reception desk for the entry doors to allow authorized persons to enter the Entry Vestibule, and once verified, will be allowed to enter the Sales Floor.

The exterior entry door is unlocked during business hours to facilitate access into the Entry Area. Once inside the Entry Vestibule, a person must check in at the Security Room transaction window. Once properly vetted, the security officer unlocks the interior Sales Floor door, which interlocks the exterior Entry Vestibule door. When the interior door is closed and locked, the exterior entry door is unlocked. After hours, the exterior Entry Vestibule door is locked by the ACS. The exterior Entry Vestibule door may be locked during business hours for additional security and vetted persons let in via the door intercom system.

When exiting the Sales Floor, a person pushes the exit bar to open the interior Sales Floor exit door. Once inside the Exit Vestibule, the interior Sales Floor door must be closed and secure before the exterior Exit Vestibule door can be opened to exit the building. While the exterior Exit Vestibule door is open, the interior Sales Floor door is interlocked to prevent it from being opened until the outer exit



door is closed and secure. Note: The interlock door controls will be overridden as required by life-safety code.

### **III. Policies and Procedures**

The Company will develop security-related policies and procedures in a written security manual. At minimum, the manual will include the development of the following policies.

1. Marijuana Product Security
  - a. Safes and Vaults
  - b. Security Personnel
  - c. Security Signage
  - d. Video Image Protection and Retention
  - e. Exterior Perimeter Lighting
  - f. Inventory and Disposal
  - g. Physical and Electronic Security Maintenance
  
2. Access Control in accordance with
  - a. Key and Access Code Control
  - b. Dispensary Facility Access
  - c. Client Access
  - d. Staff Only Areas (e.g., Break Room, Safe Room, Receiving area)
  - e. Security Officer Access (e.g., Security Room)
  
3. Visitor Management
  - a. Definition of Authorized Visitor
  - b. Notification of Visitors in Advance
  - c. Visitor Identification Badge (creation, display, and return)
  - d. Visitor Log

- e. Emergency Visitation Circumstance
- 4. Diversion, Theft, and Loss
  - a. Inventory (security aspects)
  - b. Identification
  - c. Reporting/Notification
  - d. Root Cause Analysis
  - e. Disposal of Marijuana
- 5. Alarm Activation, Security Breach and System Failure
  - a. Identification
  - b. Reporting/Notification
  - c. Root Cause Analysis

The Company will develop policies to include the following security policies for a holistic approach to dispensary facility security:

- 1. Workplace Violence
  - a. Definitions and Typologies
  - b. Management's Role and Responsibilities
  - c. Assessment
  - d. Response to Current Violence
  - e. Response to Threats
  - f. Investigation
- 2. Trespassing and Loitering
  - a. 94 C Statutes
  - b. Public Notification
  - c. Response Protocols

3. Weapons
    - a. Company Prohibitions
    - b. Signage
  
  4. Bomb Threat
    - a. Bomb Threat Checklist
    - b. Evacuation Procedures
    - c. Search Procedures
    - d. Response Protocols
  
  5. Sensitive Information Protection
    - a. Management's Role and Responsibilities
    - b. Sensitive Information Defined
    - c. Safeguarding Sensitive Information (e.g., Protected Health Information Credit Card)
    - d. Document Destruction
    - e. Clean Desk Policy
  
  6. Staff Security Awareness
    - a. Management's Role and Responsibilities
    - b. New Employee Security Orientation
      - i. How staff contact security
      - ii. What information staff should report to security
      - iii. The importance of displaying and checking identification
      - iv. Procedures for preventing and responding to security breaches
      - v. Preventing, intervening, reporting and resolving workplace violence issues
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- vi. Staff role in crime prevention
  - vii. Reporting environmental safety and security issues
  - viii. Personal safety awareness
  - ix. Confidential information and privacy issues
  - c. On-Going Security Awareness Efforts
  - d. Security Policies
  - e. Security Responsibilities
7. Robbery Prevention and Response
- a. Use of Duress Alarms
  - b. Compliance with Robber Demands
  - c. Video Surveillance
  - d. Employee Training
8. Cash Handling
- a. Acceptance of Cash from Patient
  - b. Cash Storage
  - c. Payments with Cash
9. End of Day Checklist
- a. Secure All Protected Health Information (PHI) Storage Areas
  - b. Secure Cash, Checks, and Credit Card Slip Storage Areas (i.e., Safe, cash boxes, etc.)  
or Transfer to Financial Institution
  - c. Secure All Marijuana Storage Areas
  - d. Secure All Interior Doors
  - e. Inspect Restrooms for Unauthorized Persons

#### **IV. Security Personnel**

Although not specifically required in the regulations, the UT dispensary facility will have one contracted security officer on-site during all hours that staff is on the premises. The Security Officer will be responsible for managing access, patrolling the dispensary facility, and verifying compliance with The UT security policies.

UT will develop written security post orders for Security Officers assigned to the dispensary facility. Post Orders are an essential document for Security Officers that provide guidance on expectations and instructions on performing security duties for each shift and each post. The Post Orders establish:

- Role in Client Access
- Patrol Requirements (frequency, locations, etc.)
- Alarm Priorities and Response Requirements:
  - Duress/Panic/Hold-up Alarms
  - Unauthorized Access
  - Intrusion Alarms
  - Failure Notification System
  - Door/Lock Inspections
  - Documentation (Daily Activity Reports and Incident Reports)
  - End-of-Day Inspections

The Security Officer will be armed and equipped with a radio, flashlight, and cold weather gear.

#### **V. UT will provide training to include Security Policies, dispensary facility characterization, security post orders, systems training**

- Crisis Intervention
- Security Risk Management
- Effective Communications
- Security Awareness
- Use of Force

- Alarm System Fundamentals
- Defensive Tactics and Officer Safety

## **VI. Product Delivery**

The Company will only accept deliveries from production facilities at pre-arranged days and times and only when a proper shipping manifest has been sent from the production facility to UT at least 24 hours before the delivery.

Deliveries of finished product to the dispensary will occur at the rear Warehouse area through the side door of the dispensary. Only scheduled deliveries will be allowed. When a scheduled delivery vehicle arrives, the driver will contact dispensary and security personnel to meet them at the selected entrance. The driver will remain secure in the vehicle until security and dispensary personnel arrive. Finished products will be secured in locked cases until they are secured in the LAA. Security personnel will monitor the delivery and activity in the surrounding area and street. Should any suspicious activity be identified, security personnel will stop the delivery process, secure any product in the delivery vehicle or in the building as soon as possible. Prior to entry, an UT employee will let the delivery vehicle personnel into the delivery vestibule and check their department issued identification card before entering the receiving room. There, the product shall be counted and compared to the shipping manifest.

Once approved, the UT employee shall sign both copies of the shipping manifest and keep one copy. All shipping manifests will be kept in a secure location to be available for inspection. Any returned product or payment will be given to the delivery vehicle personnel and approved appropriately. All received product will immediately be put into a safe in the Safe Room.

The entire product delivery process will be monitored by the Security Officer in the Security Room, and he or she will notify the authorities and respond to the appropriate room if any trouble arises. The delivery vehicle personnel shall not be allowed into the rest of the dispensary facility.

## **VII. Kroll's Operational Safety Program for Union Twist Company**

Kroll will ensure that the facility will exceed the State's standards for access control and cameras. There will be no queue line on the street. We have designed an internal area for customers to wait to get verified that they are eligible to enter the dispensary. UT personnel will verify proof of age as an individual enters the facility. UT staff will also ensure the person has not previously been prohibited from entry for violation of our good neighbor agreement. Once a person is verified, they will be buzzed through the security door into the sales area. Upon selecting, the client will proceed to the check out where there will be a second verification of the person's ID. UT staff will ensure that there is no loitering on the premises or surrounding area.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft and loss; UT will keep all safes, vaults, and any other equipment or areas used for the production, storage of marijuana products securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

UT will ensure all locks and security equipment are good working order and will prohibit keys, if any, from being left in the locks or stored or placed in a location accessible to persons other than specifically authorized personnel. UT will limit combination numbers, passwords or electronic or biometric security systems, to specifically authorized personnel.

Kroll will ensure that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance, where applicable. In addition, all marijuana products will be kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft. UT will develop emergency policies and procedures for securing all product following any instance of diversion, theft or loss of marijuana, and conduct an assessment to determine whether additional safeguards are necessary.

UT will share the Marijuana Establishment's security plan and procedures with Newton Police and Fire Departments and will periodically update law them as needed if the plans or procedures are modified in a material way.

### **VIII. Incident Reporting.**

UT shall notify appropriate law enforcement authorities and the Cannabis Control Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

- Discovery of discrepancies identified during inventory;
- Diversion, theft or loss of any marijuana product;
- Any criminal action involving or occurring on or in the Marijuana Establishment premises;
- Any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
- Unauthorized destruction of marijuana;
- Any loss or unauthorized alteration of records related to marijuana;
- An alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
- Any other breach of security.

UT shall, within ten calendar days, provide notice to the Cannabis Control Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified. All documentation related to an incident that is reportable pursuant to 935 CMR500.110(7)(a) shall be maintained by UT for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Cannabis Control Commission and law enforcement authorities upon request.



**IX. Security Audits**

UT will, on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit will be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, UT will submit a mitigation plan within ten business days of submitting the audit.

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## **X. Packaging of Edible Marijuana Products**

Any edible marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by M.G.L. c. 94G, § 4(a $\frac{1}{2}$ ) (xxvi) and 935 CMR 500.105(5). UT will not offer for sale edibles in the distinct shape of a human, animal, or fruit; or a shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings. UT will ensure all edible marijuana products are prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 500.105(11).

Per 935 CMR 500.150(3), in addition to the requirements set forth in M.G.L. c. 94G, § 4(a $\frac{1}{2}$ )(xxvi) and 935 CMR 500.105(5) and (6), UT will ensure that the following information or statement is affixed to every container holding an edible marijuana product:

- If the retail edible marijuana product is perishable, a statement that the edible marijuana product must be refrigerated.
- The date on which the edible marijuana product was produced.
- A nutritional fact panel that must be based on the number of THC servings within the container.
- Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: “The serving size of active THC in this product is X mg(s), this product contains X servings of marijuana, and the total amount of active THC in this product is X mg(s).”
- A warning that the impairment effects of edible marijuana may be delayed by two hours or more.

UT will ensure that each single serving of an edible marijuana product is physically demarked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products will be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort, individual servings of the product. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Cannabis Control Commission that indicates the package contains marijuana product.

UT will not deliver, sell or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15: for a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and in a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC. The THC content will be homogenous, or evenly distributed throughout the edible marijuana product.

UT will ensure that all products are marked with an easily recognizable mark issued by the Cannabis Control Commission that indicates that the product is harmful to children. In instances where the labeling of the marijuana product is unreasonable or impractical, UT will include the labeling information on a peel back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag. UT will employ tamper or opaque or plain child-resistant packaging as approved by the US Consumer Product Safety Commission for their most recent poison prevention packaging regulations.

UT will ensure compliance with 935 CMR 500.105: by not utilizing packaging methods below:

1. Using bright colors, defined as colors that are “neon” in appearance;
2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
3. Featuring cartoons;
4. Featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
5. Featuring symbols or celebrities that are commonly used to market products to minors;
6. Featuring images of minors; or
7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

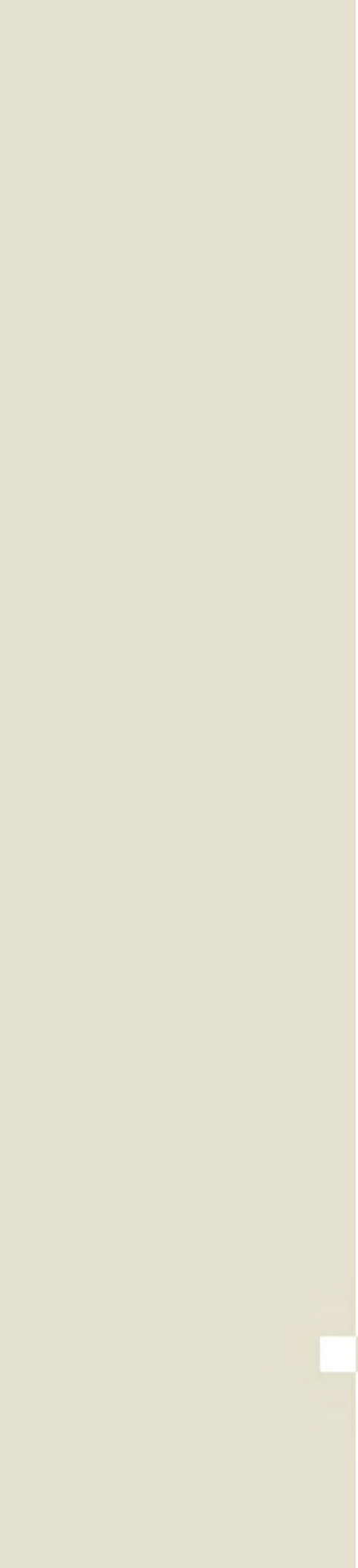
UT will utilize a Cannabis Control Commission approved seed to sale tracking program to track all product coming into and out of the facility.

## **XI. Union Twist Company Good Neighbor Agreement**

Concerns have been raised in some communities that an adult use dispensary will create more open-air marijuana use in and around the area. Kroll notes that increased use in the area has not been the experience of other facilities. Any first-time visitor to the facility will have to sign a good neighbor pledge acknowledging the current laws and regulations regarding the use of cannabis. They will be provided with educational material that will inform them how to safely consume and store their purchases, as well as a warning that anyone found to violate the good neighbor agreement by consuming in public, diverting product to unauthorized persons, or engaging in impaired operation of a vehicle will be trespassed from the property. UT will widely publish a quality of life complaint hotline that would be linked to the facility. If any residents see people engaged in illegal marijuana use in public in the area, they can call not only the Newton Police but our hotline as well. UT will make efforts to determine if the problem activity is being conducted by a client. If UT becomes aware that someone has violated the terms of the good neighbor policy such as consuming the product in public, UT will immediately trespass that individual and will list them as no longer being able to enter the UT facility. UT intends to hire Newton police officers on a detail / reimbursable overtime basis as needed.

- UT understands that police details are not mandatory assignments and officers take them on a voluntary basis there are times the detail assignment can go unfilled.
- UT will suggest that if necessary that the assignment be on reimbursable overtime. Overtime can be a mandatory assignment to ensure that an officer is assigned the duty.

As well as adding police resources to the neighborhood, Kroll believes in the broken windows theory of policing that by addressing disorder in the area environment crime is controlled. It is UT's intention if requested by the police department to purchase and donate to the town a series of cameras that can be deployed into the area surrounding the facility and or at any current areas of concern.



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