



Eagle Investigation Services, Inc.

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Joseph D. Alaimo, Chief Operating Officer

Joseph E. Solomon, Chief Financial Officer

A Service-Connected Disabled Veteran Certified Company

Marijuana Establishment

Security Plan

1 Forge Village Road, Groton MA



New England Craft Cultivators, LLC

DBA Tree House Craft Cannabis



EIS, Inc. is owned and operated by Joseph D. Alaimo, Chief Executive Officer and Joseph E. Solomon, Chief Financial Officer.



Former Methuen, MA, Deputy Chief of Police Joseph Alaimo

Joseph D. Alaimo is a former Deputy Chief of Police. He is highly decorated and accomplished management professional in the areas of Homeland Security, Law Enforcement, Criminal Law Investigation and Response to School Emergencies. Areas of expertise include in-depth knowledge and skilled in law enforcement with a strong understanding of law, regulations, ordinances, and operating policies and procedures. More than 30 years of law enforcement experience with a proven ability to create and direct security and investigative programs. Joseph is a Massachusetts Notary Public; his commission expires in 2020. Joseph maintains memberships in The International Association of Chiefs of Police (IACP). He is a US Navy veteran

that served aboard the USS San Bernardino LST 1189. He is a petrified service-connected disabled veteran



Joseph E. Solomon is a former Chief of Police in a major city police department who has experience and training in both the field of law enforcement and business management and has a unique understanding of police management skills. Joseph is well versed in Criminal Justice and Business Management, Accounting, Accident Reconstruction, Internal Affairs Investigations, Union management negotiations, Law enforcement operations, school risk mitigation, school safety and security, CPR/AED, First Aid & various medical certification training, Emergency Services, Firearms and Tactical Operations Training. He is a recognized expert and innovator in

School Safety and Security, Crisis Mitigation and Community Relations. Joseph is a national lecturer and trainer in the areas of personnel, government and corporate risk management, crisis response and personal safety.

Licenses Held by EIS, Inc. principals:

Both Joseph Solomon and Joseph Alaimo the principals of the company hold individual and corporate Commonwealth of Massachusetts Private Investigations and Security Licenses and a corporate New Hampshire Security Licenses.

Joseph Solomon is certified by the Commonwealth of Massachusetts Department of Vocational Education, to teach the Massachusetts Law Enforcement Certificate training class program curriculum.



Joseph Solomon is certified to teach the following courses:

Active Shooter Instructor

Massachusetts Criminal Justice Training Council

A.L.I.C.E Instructor (School Safety lockdown and evacuation training)

ALICE Training Institute

Solo Engagement Active Shooter Instructor RAIDER

ALICE Institute of Training

Mitigating the Active Shooter through Early Threat Detection & Response

School Safety Advocacy Council License National School Safety Conference Presenter

Understanding & Planning for School Bomb Incidents Instructor

US Department of Homeland Security License New Mexico Institute of Mining and Technology

Prevention and Response to Suicide Bombing Incidents Instructor

US Department of Homeland Security License New Mexico Institute of Mining and Technology

Incident Response to Terrorist Bombing Instructor

New Mexico Institute of Mining and Technology

Specialized Trauma and Rescue Tactics for Armed First Responders

School Violence Solutions

Human Trafficking Investigation Instructor

Massachusetts Criminal Justice Training Council

First Responder Instructor

Massachusetts Criminal Justice Training Committee

Health Care Provider CPR/AED Instructor

American Heart Association and Massachusetts Criminal Justice Training Committee

Heartsaver First Aid and Blood Borne Pathogens Instructor

American Heart Association

National Public Safety School Security Officer Certification Instructor

Emergency Services Training Association

Certified Commonwealth of Massachusetts Emergency Management Director

Massachusetts Emergency Management Association and Federal Emergency Management Association.

Certified Commonwealth of Massachusetts Police Officer

Massachusetts Criminal Justice Training Committee

Individual Crisis Intervention and Peer Support

International Critical Incident Stress Foundation

Group Crisis Intervention

International Critical Incident Stress Foundation



I Awards Received:

Principle owner **Joseph Alaimo** was awarded *The Police officer of the year, Methuen Exchange Club (1992)* - Presented for actions taken to save a police officer shot in the line of duty on Christmas Day, 1991 by aiding in the capturing of the individual while performing CPR on the officer that was shot. *The Medal of Valor*, Italian International Police Officers Association, *The American Red Cross Lifesaving Award*, *The John J. Megina High Performance Award*, *The Award for service Above and Beyond the call of duty*, Sons of Italy, *The Methuen City Council Certificate of Achievement Award* and *The Massachusetts House and Senate Awards & Citations for Bravery*

Principal owner **Joseph Solomon** was awarded *The National Shared Vision award* for outstanding community engagement and community policing innovation by the International Chiefs of Police Association in conjunction with the National Association of Town watch in 1997. In July 2014, he was also awarded the *Innovation in School Safety and Security, Crisis Mitigation and Intervention award* by the School Safety Advocacy Council at the National School Safety Conference in Orlando, Florida.

II Professional Memberships:

Joseph Solomon is a member in the following professional associations:

- **ASIS international**
- **The International Law Enforcement Educators and Trainers Association**
- **The National Rifle Association Law Enforcement instructors**
- **The Massachusetts Association of Campus Law Enforcement Administrators (MACLEA)**
- **The International Association of Campuses Law Enforcement Administrators (IACLEA)**
- **The International Association of Chiefs of Police Association**
- **The National Chiefs of Police Association**
- **The Massachusetts Association of Chiefs of Police**
- **The North Eastern Massachusetts Law Enforcement Council**
- **The Essex County Chiefs of Police Association**
- **The Massachusetts Police Association**
- **The Massachusetts Juvenile Officers Association**

Joseph Alaimo is a member in the following professional associations:

- **ASIS international**
- **The International Association of Chiefs of Police Association**
- **The Massachusetts Police Association**



- **Founding member of the Concerns of Police Survivors Association**
- **The American Association of Notaries**

The following physical security plan outlines the security measures for the proposed location of a Marijuana Retail in Groton, Massachusetts. This plan addresses the security requirements in 935 CMR 500.00, specifically as listed in 935 CMR 500.110. It should be noted that we obtained from the Groton Police Department Marijuana liaison, any published or prepared City requirements or specifications that address either requirements or minimum standards for security plans. We were advised that no specifications in general or particular were being released and each plan would be reviewed individually. Therefore, any further or updated requirements that are issued by the Town of Groton or any of its departments that pertain to security will be reviewed and all required, and any reasonable suggested requirements will be adopted.

This plan is broken out into areas of the physical building:

Retail Location Exterior: The exterior of the building will be posted:

- All transactions are conducted by electronic payment or cash,
- This facility and premises are electronically monitored and recorded.
- Security measures detailed below.

The Retail entrance and exit shall be maintained clear of any barriers, landscaping and similar obstructions that may block the view so that the entrance and pedestrian access is clearly visible from the public street, sidewalk and parking area. All interior and the rear exterior doors will be metal and attached to a metal frame, they will be electronically controlled by either swipe cards, and FOB's or keypads.

This location is in a shared space building, but NECC will have its own entry and exit ways.

Exterior of Shared Building:

The exterior of the building to include the parking area will be patrolled during the business hours of the retail Marijuana sales shop by a uniformed guard.

Private Entrance: The main lobby on the first floor is equipped with safe entry ways for NECC business only

Entry and Exit point: All entry and exit points as well as interior access points of the retail store door will be equipped with electronic access control. Only those employees or vendors who are cleared for access will be allowed into specific areas. The exterior and interior access doors will have predetermined and assigned security level access. Only those employees and or vendors approved to access a specific area will be granted electronic access. This access is



controlled by electronic levels of authorization for each FOB, swipe card or keypad access code. Signage will be posted indicating that the retail location is being videotaped.

Secured Control Area: This area is limited to those company employees who are authorized to enter this area for purposes of their job duties. This is the area where Marijuana for sale is stored and or kept. This area will be controlled by a dual authentication through badge access and biometric/keypad reader.

Storage Safe and Room(s): This area is designated as a **Secured Control Access Area**, and thus this area is limited to those company employees who are authorized to enter this area for purposes of their job duties. This is the area where Marijuana for sale is stored and or kept. This area will be controlled by a dual authentication through badge access and biometric/keypad reader. The safe and the room(s) containing the safe(s) will remain locked always except when approved access is required. All Marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft and loss; The storage area or safe containing Marijuana products will be securely locked and protected from entry, except for the actual time required to remove or replace Marijuana;

Control Area This area will be manned with one plain clothes security officer. There will be no access to this area from the exterior of the building. This area will contain a monitoring station to monitor the cameras and alarms system for the premises, and will include a scanner to verify customers age and identity prior to entering. Access to this area is restricted **ONLY** to those authorized to enter.

Security Personnel: The facility will be staffed with a minimum of one uniformed security officer during all hours of operations.

- The security officer will patrol the exterior of the building to include the parking area and equipment storage areas. This position will be reviewed with the Groton Police after 90 days to determine the need.

The staffing plan shall be reviewed with the Groton Police Chief (or her designee) on an annual basis.

Marijuana Consumption on Premise: The consumption of Marijuana products anywhere on the premises is strictly prohibited by policy and state law. Appropriate signage shall be placed inside the premises to clearly state this prohibition. Any violation of this prohibition will immediately addressed with the patron whom will be notified by security personnel to cease and leave the premises.

Purchase procedures: All payments will be by an approved electronic payment method or cash.



Employee Entrance: All employees will be required to enter and exit the facility through the secure employee entrance/exit doorway. All employees will be issued electronic key access cards.

Employee Identification: All Retail employees will always visibly display an identification badge issued by the retailer while on the premises or transporting Marijuana.

Outside Vendors, Contractors, and Visitors: Shall be issued a visitor identification badge prior to entering a limited access area. They will always be escorted while on the premises by an authorized employee. The visitor badges will always be visibly displayed while on the premises and shall be returned upon exiting. All vendors, contractors and visitors shall sign in and out in a log which will be maintained by security and which shall be available for inspection by authorized agencies.

Smoking: This facility is designated as a nonsmoking facility, which includes all types of electronic inhaling devices. Appropriate signage will be posted both inside and outside the premises.

Professionally Monitored Alarm System: At a minimum, the system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls or walls shared with other facility tenants, roof hatches, and storage room(s) that contain safe(s), to include glass break monitoring points, motion detection, and contact alarm points, and includes the following: The main alarm system will be connected to an uninterrupted power supply which will be connected to a backup generator. This main security system will be connected to the Groton Police Department if required. The alarm system will be connected to a secondary alarm monitoring company and will be equipped with redundancy by means of a cellular alarm or radio back up system. If an alarm is received the primary alarm company will alert their building-specific contacts so that they can activate their response protocols. The second alarm system provides a fail-safe in case the primary alarm system fails, or the first company is unable to respond to the alarm for any reason. This alarm system will include a failure notification system that will provide and audible, text, and or visual notification of any failure in the surveillance system. This notification shall be sent to the designated employee(s) within five (5) minutes of the failure.

24-Hour Surveillance Cameras: The Retail location will operate and maintain in good working order, twenty-four (24) hours, seven (7) days a week, a closed-circuit television (CCTV) surveillance system on the premises which will record twenty-four (24) hours, seven (7) days a week and has the capability to be securely monitored remotely. Each interior room, the complete exterior including the adjacent sidewalks, the parking lots, and the entrance and exit ways will be equipped with surveillance cameras. A camera viewing console will be placed in the secure security area for live monitoring during business hours. The recordings will be maintained for at least 90 days.



- All security equipment shall be inspected and tested at regular intervals, minimally every thirty (30) calendar days from the previous inspection and test. The security company which provides the equipment will perform the inspection and testing.
 - All areas that contain Marijuana will be equipped with video cameras.
 - The cameras will be directed at all safes, sales areas, and all areas where Marijuana is processed, prepared, stored, handled or dispensed.
 - A camera will be positioned in a manner to allow the reading of the scale weigh when in use.
 - The cameras shall be angled to allow for the capture of clear and certain identification of any person entering or exiting the retail area, or any other areas.
 - A date and time stamp embedded in all recordings, which shall always be synchronized and set correctly and shall not significantly obscure the picture.
 - The system will have the ability to immediately produce a clear, color still photo whether live or recorded. The video recording will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif.
 - Exported video shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alternation of the recorded image has taken place. Exported video shall have the ability to be saved in an industry standard file format that may be played on a standard computer operating system. All recordings shall be erased or destroyed prior to disposal.
 - The system is equipped with Internet protocol (IP) based secure access.
 - All recording equipment will be in a secure location.
 - The ability to remain operational during a power outage.
- **Motion Detectors:** Motion detectors will be placed on the walls reasonably located below the ceiling in order to detect any attempt to gain access from the roof.
 - **A Panic Button for Employees:** The system shall include at least two (2) holdup alarm/panic alarms, one (1) for staff use which will be placed at the point of sale location and (1) for security use.



Loitering Prevention: Security will monitor exterior cameras to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute can remain on the premises

The Disposal of Marijuana Procedure: The disposing of excess Marijuana will be in accordance with 935 CMR 500.105(12) in excess of the quantity required for normal, efficient operation as established within 935 CMR 500.105.

Marijuana Dumpster: The dumpster for the disposal of Marijuana that complies with the disposal procedure above will be held in a secured dumpster area that will be placed in the parking lot utilizing a designated area (see architectural drawing for placement).

Emergency Response Policies and Procedures: If an instance of diversion, theft or loss of Marijuana, occurred. The security personnel will prevent egress and ingress into the secure area of the facility. They will report this incident immediately to the Groton Police Department and the security supervisor who shall respond to the location to take control and conduct and investigate in conjunction with the Groton Police Department. The security supervisor will as a follow up conduct an assessment to determine whether additional safeguards are necessary.

Incident Reporting: All incidents of breach of security and/or loss or theft of Marijuana shall be reported to the Groton Police Department and the Commission 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:

1. discovery of discrepancies identified during inventory.
2. diversion, theft or loss of any Marijuana product.
3. any criminal action involving or occurring on or in the retail premises.
4. any suspicious act involving the sale, cultivation, distribution, processing or production of Marijuana by any person.
5. unauthorized destruction of Marijuana.
6. any loss or unauthorized alteration of records related to Marijuana.
7. an alarm activation or other event that requires response by public safety personnel or security personnel.
8. 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
9. any other breach of security.

Auditing and Tracking System: A point of sale tracking system will be installed that tracks all products that are received, from intake to sale. The tracking system will be monitored and audited annually by trained security personnel who are not assigned to this location, in order to maintain independence. They will also monitor and audit the entrance and exit logs which are produced from the entrance and exit electronic scans.



Security Lighting: During all business nighttime hours, the facility shall illuminate exterior areas of the premises, including related parking areas, sidewalks and building entrances so that all areas are readily visible. During all business hours, the facility shall illuminate those areas of the interior of the building where the public has access, including the public entry, reception area, and counter area, as well as the interior hallways, other building ingress/egress locations and locations where Marijuana may be located, stored or processed.

Delivery Security/Access: All deliveries to the facility will be controlled and scheduled.. The schedule of delivery will vary from and be randomized for security purposes. The deliveries will be received through the main entrance. This area will be monitored twenty-four (24) hours, seven (7) days a week, by a closed-circuit television (CCTV) surveillance system. The deliveries will be overseen by security personnel and conducted by staff. Once in the lobby the security officer who is already in place in the control room will verify the delivery, the staff member, and the vendor. Once this information is confirmed, they will be allowed access into a secure customer service area.

Limited Access Areas: All limited access areas will be identified with the posting of sign measuring 12” X 12”, with the following: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only”. The lettering will be 1 inch in height.

Traffic and Crowd Control Measures: The security department will work in conjunction with the Groton Police department to develop and approve a plan for traffic and crowd management. This plan will be updated and modified as needed with the input of the Groton Police Chief or designee. Based on this location we project that traffic control and crowd management will **NOT** be an issue.

Transportation and Delivery Procedures: The transportation and delivery procedure will meet or exceed all Cannabis Control Committee and Groton Police Department regulatory requirements.

Employee Security Training: All employees will be trained in the following areas by trained security professionals:

- Interior, exterior and personal safety prior to being assigned a schedule, and will receive annual in-service training in this area.
- Employees will additionally be trained and certified in CPR/AED and first aid and be equipped to deal with emergent situations.
- Employees will receive transactional security training prior to being assigned a schedule and will receive annual in-service training in this area.
- Employees will receive emergency preparation training prior and desescalation training and will receive annual in-service training in this area.



Background checks for employees: Each applicant shall be required to undergo a criminal background check. The criminal background check shall include both a local and FBI check.

Security: Trained security will be present at the control center during all hours that the facility is open. Trained security will be present during all deliveries.

The above outlined plan exceeds the requires as set forth in 935 CMR 500.000, specifically as listed in 935 CMR 550.110. If security requirement information is provided by the City, this plan will be reviewed and updated if necessary, to include all mandatory measures, procedures, methods or policies or procedures.

If EIS, Inc. can be of further assistance please contact Joseph D. Alaimo the Director of Security for this operations plan.

During the check in process security will identify all individuals on the premises and ensure they are limited to those aged 21 or over. *In compliance with 935 CMR 500.110(1)*

All waste containing finished marijuana shall be stored and secured. *In compliance with 935 CMR. 500.110(1) and 500.105(12)*

No fewer than two (2) establishment agents shall witness and document how waste is disposed. *In compliance with 935 CMR. 500.110(1) and 500.105(12)*

All security equipment will be kept in good working order. *In compliance with 935 CMR 500.110(1)*

All keys will be secured in a secured access area where only authorized personnel have access. *In compliance with 935 CMR 500.110(1)*

Access to combination numbers, passwords, or biometric security systems will only be allowed only to authorized personnel. *In compliance with 935 CMR 500.110(1)*

All marijuana shall be kept out of plain sight. *In compliance with 935 CMR 500.110(1)*

The establishment' s security plan has been shared with local law enforcement and has received the approval of the Chief of police. *In compliance with 935 CMR 500.110(1)*

All limited access areas are clearly described and listed on the security plan diagram. *In compliance with 935 CMR. 500.110(4)*



All incident reports shall be maintained for a period of one year or for the duration of an open investigation, whichever is longer. *In compliance with 935 CMR.500.110(7)*

All trees, bushes, and other foliage outside the establishment shall be maintained to prevent persons from concealing themselves from sight. *In compliance with 935 CMR.500.110(5)*

There shall be an on-site secure locked safe or vault used exclusively for the purpose of securing cash. *In compliance with 935 CMR.500.110(7)*

Cameras are directed where all cash is kept, handled, and packaged. *In compliance with 935 CMR. 500.110(7)*

Security shall establish a written process for securing cash and ensuring transfers of deposits to the Marijuana Establishment's financial institutions. *In compliance with 935 CMR 500.110(7)*

An armored transport provider that is licensed pursuant to M.G.L. c. 147, § 25 shall be used for all cash transports. *In compliance with 935 CMR. 500.110(7)*

At all times the use of a locked bag for the transportation of cash from a Marijuana Establishment to a financial institution or DOR facility if approved for an alternative security measure. *In compliance with 935 CMR 500.110(7)*

Transportation of cash shall be conducted in an unmarked vehicle if approved for an alternative security measure. *In compliance with 935 CMR 500.110(7)*

All vehicles used to transport cash shall be staffed with a minimum of two agents if approved for an alternative security measure. *935 CMR 500.110(7)*

All vehicles used to transport cash shall be equipped with real-time GPS tracking if approved for an alternative security measure. *In compliance with 935 CMR 500.110(7)*

All vehicles used to transport cash shall have two-way communications with Marijuana Establishment if approved for an alternative security measure. *In compliance with 935 CMR 500.110(7)*

The transportation of Marijuana or Marijuana Products at the same time that cash is being transported for deposit to a financial institution or DOR facility if approved for an alternative security measure is prohibited. *In compliance with 935 CMR 500.110(7)*

We will seek approval of the alternative safeguard by the financial institution or DOR facility if approved for an alternative security measure. *In compliance with 935 CMR 500.110(7)*