A Response to the Request for Expressions of Interest for Marijuana Licensing in the City of Longmont



Submitted by Brothers for Life LLC dba Starbuds

Proposed Location: 1600 Hover St., Unit 2B, Longmont, CO 80501

November 29, 2017



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City of Longmont c/o Shawn Lewis Longmont Assistant City Manager 303-651-8760 shawn.lewis@longmontcolorado.gov

RE: Marijuana Store License Application for Brothers for Life LLC dba Starbuds

Dear Shawn and team:

It is with great pleasure and enthusiasm that we submit our application for licensure in the City of Longmont.

As Colorado's thirteenth most populous city, Longmont presents a wealth of opportunity for the cannabis industry. Longmont's population and proximity to other large population centers makes it an ideal location to establish a retail store with an eye towards a long, sustainable, and successful future.

The businesses united under the Starbuds tradename make up one of the largest and most experienced brands in the Colorado marijuana marketplace. Starbuds has assembled a top-notch team of professionals to ensure that each of the Starbuds stores is an asset to the communities in which they are located. We pride ourselves on providing customers with a safe, friendly shopping environment and municipalities with a trustworthy, cooperative partner for economic growth.

We hope that this application will showcase the depth of knowledge that our team can bring to Longmont and we look forward to a safe and prosperous future for our brand and the City of Longmont.

Sincerely, The Starbuds Team

Background

DR 8520 Associated Person & Associated Key License Application:

See attached.

Statement of all violations and penalties for any infractions or offenses by the applicant or applicant's owners, principal officers, managers, or employees relating to any marijuana establishment in the state or a statement that no such violations or penalties have occurred:

Below is a list of the other marijuana businesses in which the owners of Brothers for Life LLC dba Starbuds have an ownership interest, along with the history of any administrative violations for each business.

Brian Ruden is one of the largest license holders in the State of Colorado and has been an owner since 2010. Given the number of licenses he holds, and the amount of time he has been operating, we believe his administrative record reflects a dedication to regulatory compliance on par with the most diligent amongst his peers.

Bassel Wahdan and Kaldiah Wahdan are each currently co-owners with Brian Ruden in certain existing Starbuds retail marijuana stores (as detailed below). They have each taken an active role in the management and operation of the stores they own, and each has an exemplary compliance record.

Lucky Ticket (dba Starbuds)

Brian Ruden - Owner/Founder, 2015-present Bassel Wahdan – Owner, 2016-present Kaldiah Wahdan – Owner, 2016-present 1451 Cortez St., Unit A, Denver, CO 80221 Retail Marijuana Dispensary

Administrative history: none

Starbuds Louisville (formerly operated as Altermeds) Brian Ruden - Owner, 2014-present Bassel Wahdan – Owner, 2016-present 1156 W. Dillon Rd., Unit 3, Louisville, CO 80027 Retail Marijuana Dispensary

Administrative history: none for the retail store in Louisville. [As Altermeds, the business used to have an associated cultivation operation in Boulder, which received two fines from the City of Boulder, one for a non-compliant safe and the other for a building inspection violation.]

Starbuds Federal Heights

Kaldiah Wahdan – Owner, 2017-present 9000 N. Federal Blvd. Federal Heights, CO 80260 Retail Marijuana Dispensary

Administrative history: none

Tree of Wellness

Brian Ruden - Owner/Operator, 2010-2016 (business sold in 2016) 1000 W. Fillmore St. #105, Colorado Springs, CO 80907 Medical Marijuana Dispensary, with associated Cultivation (located in Denver) and Marijuana Infused Products Manufacture

Administrative history: fined by the City of Denver in 2016 for a fire code violation; issued an administrative order from the City of Denver in 2016 to destroy plant material that failed a contaminant test.

Colorado Health Consultants (dba Starbuds)

Brian Ruden - Owner/Founder, 2013-present 4690 Brighton Blvd., Denver, CO 80216 Retail Marijuana Dispensary (licensed as Medical prior to 2014)

Administrative history: signed an assurance of compliance with the Colorado Marijuana Enforcement Division in 2014 to adjust placement of security camera; fined by the City of Denver in 2015 and 2016 for advertising visible from the street.

Starbuds Aurora

Brian Ruden - Owner/Founder, 2014-present 1408 Del Mar Pkwy., Aurora, CO 80010 Retail Marijuana Dispensary

Administrative history: received a warning letter from the Colorado Marijuana Enforcement Division in 2015 regarding placement of surveillance cameras.

Starbuds Pueblo

Brian Ruden - Owner/Founder, 2015-present 4305 Thatcher Ave., Pueblo, CO 81005 Retail Marijuana Dispensary

Administrative history: received a warning letter from the Colorado Marijuana Enforcement Division in 2016 regarding an erroneous entry of data in the state seed-to-sale tracking software.

Starbuds Alameda

Brian Ruden - Owner/Founder, 2016-present 428 S. McCulloch Blvd., Pueblo West, CO 81007 Retail Marijuana Dispensary

Administrative history: none

Starbuds Mips

Brian Ruden - Owner/Founder, 2016-present 9670 Dallas St., Unit E, Henderson, CO 80640 Marijuana Infused Products Manufacture

Administrative history: received a warning letter from the Colorado Marijuana Enforcement Division in 2016 regarding an outage of the recorded backup of the video surveillance system; entered into a stipulation with the City of Commerce City to correct the video surveillance backup and to re-engineer the odor mitigation systems.

Starbuds Commerce City

Brian Ruden - Owner/Founder, 2017-present 5844 Dahlia St., Commerce City, CO 80022 Retail Marijuana Dispensary

Administrative history: issued a warning letter by the Colorado Marijuana Enforcement Division for missing paperwork in the license renewal application.

Starbuds Niwot

Brian Ruden - Owner/Founder, 2017-present 6924 N. 79th St., Niwot, CO 80503 Retail Marijuana Dispensary

Administrative history: none

Site Control Plan

the site:
See attached
Authorization to use property for marijuana business:
See attached
Zoning verification from the Planning and Development Services Department:
See attached
A vicinity map and description showing the proposed locations relative to the nearest residentially zoned area and the nearest school serving students in any
grade from kindergarten through 12 th grade:
See attached
A site plan showing the entire vicinity in which the marijuana establishment is
located, including buildings, street(s), parking lot(s), exterior lighting plan,
landscaping plans, identification of other tenants on and surrounding the property:
See attached
A general description of site improvements proposed and the anticipated City of

Longmont Land Development Code approvals required:

Possessory documents demonstrating that the applicant has legal possession of

See attached



AUTHORIZATION TO USE PROPERTY FOR A MARIJUANA BUSINESS

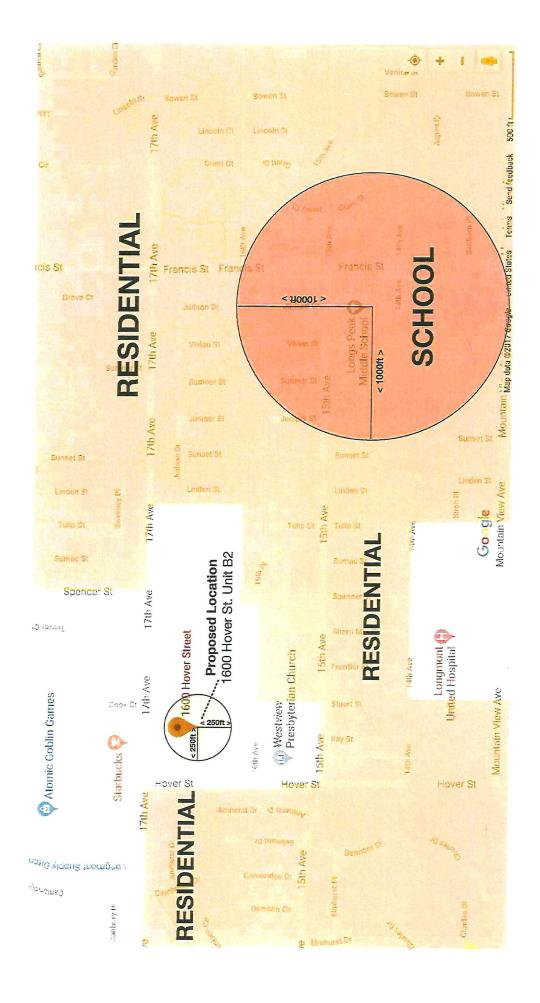
Business Name (dba):	Property Address: 1600 He ver St		
Ster bods	Suite/Unit #: 121 Long mont, La 8050		
As owner of the property described above, I hereby consent to the use of said property for the purpose of conducting a marijuana business so long as said use is authorized under and in accordance with applicable state and local laws. This consent is valid under the following terms and conditions: •Check all that apply:			
Retail Marijuana Store	 Medical Marijuana Center (Allowed as part of a co-located retail and medical facility only) 		
understand:			
 That the lessee must operate the business on the prop Code of the City of Longmont. 			
That, in issuing a marijuana business license, the City of Longmont assumes no legal liability or duty of care regarding the licensee's business operation or possession of the property.			
 That, pursuant to Sections 12-43.3-105 C.R.S. (Medical), and or 12-43.4-105 C.R.S. (Retail), any person within a Restricted Access Area or Limited Access Area that does not have a valid occupational license shall be considered a visitor and must be escorted at all times by a person who holds a valid Associated Key License. This includes the Property Owner. 			
In the event of any conflict between the terms of this Authorization to Use Property for a Marijuana Business and any other documents submitted with this application, the terms of this Authorization form shall control.			
I hereby release the City, its officers, elected officials, employees, attorneys and agents from all liability for claims of damages of any kind whatsoever, present or future, in any way relating to or arising from the conduct of the			
N Printed	Dargot F. Zaterman Managing		
Date TFR	CO, LLC 2000 S. Co Sorado Blud ny Name/Address C Telephane - Co		
State of State of	NOTE 2-150 90222		
County of i County) ss.			
Subscribed and sworn to before me this 22 day of November 2017, by Harget F. Zaterma.			
JANET S FULLER NOTARY PUBLIC STATE OF COLORADO NOTARY ID 19894015987 MY COMMISSION EXPIRES APRIL 7, 2019	Notary Public		

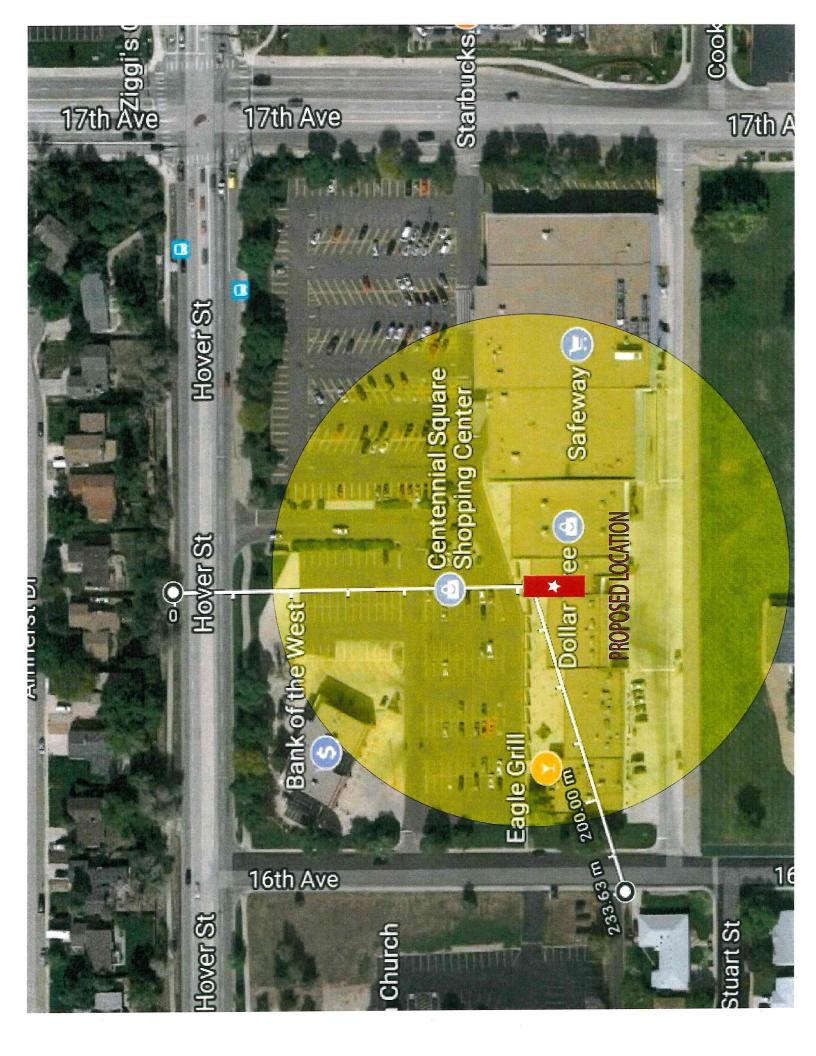
Zoning Verification

This form must be submitted to the Planning & Development Services Department to verify zoning for marijuana establishments. Once submitted, staff will review, complete, and return the form to the requestor. The completed form must be submitted to the Marijuana Licensing Authority as part of the response to the City's Request for Expression of Interest to obtain a marijuana license. The fee for zoning verification is \$50 and can be paid by check, credit card, or cash at the Development Services Center.

Site Plans, site plan waivers, change of use, or other development applications are a separate process.

Applicant Name: Brothovs for Life LLO Address (Include City & State): 11330 NOVOYO CIYCLE Phone: 303-809-8330	E-Mail: basselw@htmail.com Unit A, Wildminster, 00 8623 Fax: with a purchase or lease agreement for the property.	
Address (Include City & State): 11330 NOVOLO CIYCLE Phone: 303-809-8330	Fax:	
11330 Navajo Circle Phone: 303-809-8330	Fax:	
0669-606-605	Fax:	
	with a nurchase or lease agreement for the property	
* Applicant must be either the owner of the property or be a party with a purchase or lease agreement for the property.		
New Business Information		
Property Address: 1600 Hover S-	+ OOH Balanantast	
Name of Proposed Business: Stay Ouds	o The San All Control of the San All Control	
Previous Business Use: \(\O(1)\) \(\O(1)\)		
Applicant Certification		
Applical	Date;	
· ·	11/07/2017	
· ·		
Zoning Information		
To be completed by Planning & Development Services Staff		
Zoning District:	Other Information:	
Commercial (C)		
☐ Commercial – Regional (CR)	展 At least 1000' from K - 12 school	
☐ Business Light Industrial (BLI)		
☐ Mixed Industrial (MI)		
☐ Other zoning district (not allowed)		
Staff Signature:	Date:	
	27 November 2017	
Staff Name & Title:		
Ian Colby Planning Technicia		





Longmont site improvements:

The location for the store at 1600 Hover St., Unit B2, Longmont, CO 80501 is a unit within an existing shopping center.

Because we are working with an existing building, no exterior construction is anticipated, with the exception of adding signage and exterior surveillance cameras. Signage will comply with Chapter 15:06 of the Longmont Land Development Code, contained within the Longmont Municipal Code. A sign permit will be required per 15.06.050.

On the interior of the space, there will be construction required to divide the space into separate and secure restricted and limited access areas. Inside the front door of the space, a lobby area will be created. A reinforced wall will be constructed to separate the lobby from the retail sales floor area, which is a restricted area. A window for checking IDs will be located in the wall between the lobby and retail sales area, along with a reinforced door, which will be controlled remotely with buzzer access. The retail store area will have display cases, shelving, and a lockable refrigerator. Another reinforced wall will be constructed to divide the retail sales area from the back of the building, which will be a limited access area, and will contain an office and a safe. From both the front and back of the unit, there will be at least two secured doors separating the exterior from any room where there is a safe or where marijuana is present.

As the project is commercial construction, a building permit will be required (permit B, for Commercial Construction Remodel/Addition) from Building Inspection.

All permitting requirements to be confirmed by a licensed contractor and the City of Longmont.

Community Outreach Plan

Applicant's history of community and neighborhood involvement with other similar businesses:

Starbuds actively seeks out neighborhood projects and objectives with which to assist. We strive to participate in the community by attending meetings of neighborhood organizations, contributing to existing programs with local benefit, and working to further new projects to create positive local outcomes.

Examples of Starbuds' past and ongoing community engagement efforts:

- -Sponsor of the "Shop with a Cop" program in Aurora, Colorado. The program is designed to unite Aurora Police officers and public safety employees with local disadvantaged children for a special day of shopping. Each child is guaranteed new shoes, several outfits of clothing, and backpacks filled with school supplies. Children and families are carefully selected and screened by a committee of local law enforcement officers. Approximately \$200 is spent on each child, and the program is made possible by donations from citizens and businesses in the Aurora community.
- -Holiday Toy Drive. This past holiday season Starbuds joined other businesses including King Soopers, 97.3 KBCO, and KOA NewsRadio to collect new toys and cash donations for children and youth served by the Boys & Girls Clubs of Metro Denver. Customers were encouraged to donate items such as toys, games, art kits, DVDs, video games, sporting equipment, electronics, helmets and other gifts for children and youth. All items were distributed at Boys & Girls Clubs' holiday parties so that every child gets a gift this year.
- -Clean Colorado Program. Roadside litter costs millions of dollars annually to control. Starbuds is a proud sponsor of the Clean Colorado program to help maintain our roadways and environment.
- -Community Awareness and Participation. In the Elyria-Swansea neighborhood of Denver, which has a particularly high density of marijuana businesses, Starbuds has had a presence at meetings of the North Neighborhoods Democratic Council and Comunidades Unidades. Starbuds has worked with Focus Points, a local community resource and gathering place, to develop an understanding of the community. As a result of the meetings it has attended, Starbuds has been working with Kind Colorado, Comunidades Unidades, and Focus Points in an attempt to create a new scholarship program to assist neighborhood residents attending college.

Written policies and procedures to address community concerns and complaints:

Neighborhood residents may express any concerns or complaints, in writing, by sending an email to:

bob@starbuds.us

Starbuds will respond to written inquiries within 10 business days. Starbuds will make a good faith effort to accommodate reasonable requests or make practical procedural changes to resolve complaints.

If a neighborhood resident or business believes that the response to an initial written request, per the above procedure, has not been satisfactory, then a request for a secondary review may be made by forwarding the email correspondence chain, along with an explanation of the relief sought to:

legal@starbuds.us

Starbuds will again respond to any such inquiry within 10 business days. A response to a request for secondary review will be deemed the final resolution or final position statement of Starbuds with respect to the concern or complaint.

A designated point of contact, with comprehensive contact information, for public questions and concerns:

Bassel "Bob" Wahdan

303-809-8330

bob@starbuds.us

Measures and procedures for mitigating any impacts to the neighborhood:

Starbuds will work with the City of Longmont Community and Neighborhood Resources department to identify and connect with the neighborhood organizations whose boundaries encompass the store location at 1600 Hover St., Longmont, CO 80501.

Starbuds has undertaken a plan to:

- a. Attend neighborhood organization meetings when feasible;
- b. Open pathways of communication with community organizations;
- c. Be responsive and receptive to community feedback regarding the Starbuds store;

- d. Seek out community projects and objectives which align with Starbuds values;
- e. Engage in furthering identified neighborhood projects and objectives;
- f. Advocate for positive community impacts; and
- g. Facilitate responsible cannabis education and dialogue.

Starbuds has an ongoing relationship with the non-profit organization Kind Colorado, which seeks to create strong, positive relationships between cannabis businesses and communities. Kind Colorado is involved in meeting with community organizations to discover where community goals can be furthered by sponsorship or volunteer contributions from cannabis businesses. Kind Colorado has also assisted with preparing Starbuds' Community Engagement Plans in Denver.

Odor Management Plan

A description of what methods and measures the business intends to take for preventing any odors from emanating from the business:

The store will take a multi-pronged approach to odor control. This approach includes the use of odor resistant storage packaging; odor resistant display containers; sealing of doors, walls, and windows; installation of UVC emitters; replacing HVAC system filters with activated carbon filters; and adding induct air filtration units.

When marijuana is exposed to oxygen in the air, oxidation and subsequently degradation of the product is activated. As marijuana breaks down, more odor generating particles are released into the air. A simple odor control method (that also helps maintain the integrity of the product) is to store marijuana in packaging (such as sealed Mylar bags) that prevents the majority of oxygen molecules from permeating the packaging thereby preventing degradation of the product and eliminating the escape of odor causing particulates.

Glass is another material which does not allow oxygen permeation and, therefore, may be used for odor control. While impractical as a storage packaging option, transparent glass display containers allow customers to clearly see the products - reducing the frequency the container must be opened thereby reducing the number of times odor is released into the air.

All walls and windows will be sealed with spray foam/caulk/silicone. All doors will be sealed with weather stripping. The sealing of all doors, windows, and walls will greatly reduce any odors from escaping the facility.

UVC emitters will also be installed in the HVAC system. The UVC light cleans the coils of the HVAC system and improves overall air quality.

Typically, filters used in HVAC systems are pleated synthetic materials in varying thicknesses that have no odor absorption capability. These filters will be replaced with filters that are made from a matrix coated with titanium dioxide infused activated carbon. The matrix design increases the surface area of activated carbon exposed to the air which, in turn, increases the efficiency of the filter to absorb odors out of the circulated air.

Initially, induct air purification systems will be installed in the retail room and the waiting room. The induct air purification systems use fans to draw air from the room and through activated carbon filters to remove odors, dust, and other fine particulates. More units could quickly and easily be installed at any time in the unlikely event additional odor control is needed.

It should be noted that the indoor environment is maintained by the HVAC system and, as policy, all windows and doors are kept closed.

Hyper Fan 8 inch - 710 CFM + Phresh 750 CFM Carbon Filter Combo



Hyper Fans are designed and built with many features that increase longevity, reduce operating costs, and drastically lower heat output.

With a Next Generation "Multi Phase" motor that uses up to half the power of traditional EC or DC motors. The internal large sized, self lubricating ball bearings ensure smoother operation, less heat friction and increased lifespan, extremely quiet, long lasting and very reliable.

Hyper Fan combines Laminar Blade Design and Stator Technology inspired by the modern jet engine, to reduce noise, increase airflow and create the highest static pressure performance of any fan in it's class.

Uses about half the power as traditional fans.

Lightweight aluminum housing is one-third the weight of comparable steel bodied fans. Compact and easy to install.

Universal mounting positions – can be mounted in any position allowing maximum flexibility during installation.

Heavy-duty 6/8/10 mm bearings, versus commonly used 4 mm bearings, ensure smoother operation and increased longevity of the fan. 5 year warranty.

Phresh filters are state of the art carbon filters that practically scour the air to make it clean of dust, foreign particulates, organic compounds and odors. Compared to their

competitors, Phresh carbon filters are half the weight, last twice as long, have the largest selection of sized to choose from, and are very competitively priced.

Phresh filters rely on the unique properties of high grade RC-48 activated carbon, found exclusively in Western Australia. These filters are currently being used in research labs, plant breeding, tissue culture, indoor gardening, backyard and commercial greenhouses. Phresh carbon filters are professional-grade system designed to meet the demands of serious hobbyists and commercial applications.

Carbon Pleated Filter



These premium quality odor reduction carbon impregnated pleated filters are interchangeable with existing HVAC filters. This specialized media used in the filter offers BOTH particulate and molecular filtration. Odorous gases and vapors are attracted to and held by the unique properties of the activated carbon material. Our media not only attracts and holds small particles, it removes formerly unfiltered gases and odors from the air. And it does it all in one filter! Filter last approximately 3 months under normal use. Ideal applications include the control of odors from: cooking, food odors, new paint, new carpet, bathroom smells, cigarette, cigar smoke, pets. Features: Highly adsorbent fiber surfaces provide excellent molecular filtration. Efficiency rating of approximately MERV 8. Electrostatic fibers for more complete small particle capture. Chemically inert, 100% polyolefin fibers.

UVC Emitters



SAFER, HEALTHIER BUILDINGS START WITH (FIT) PLUS UVC SYSTEMS.

Getting high-energy germicidal UVC light installed to clean coils in your HVAC system and improve indoor air quality (IAQ) has never been faster or easier. The Rapid Install Kit (RIK) provides a quick, simple installation of Steril-Aire Single-Ended Enhanced UVC Emitter® lengths from 24" to 61".

RIK is designed for medium to large air handling units typically found in commercial and industrial applications. It is the perfect solution for installations with space constraints, staggered banks and facilities where HVAC downtime is a critical concern.

STERIL-AIRE FIT PLUS FEATURES:

- Easy Installation: Specifically designed for easy and cost-effective installation
- Fast Installation: Pre-wired from our factory, significantly reducing installation time and HVAC downtime
- Flexible: 6 Enhanced Emitter lengths (24", 30", 36", 42", 50", 61") with up to 8 rows of Emitters for optimum coil coverage
- Economical Shipping: Smartly designed to fit in one box, ensuring efficient shipping
- Unmatched UVC Output: Delivers up to 6 times the output of competitive UVC products, for the best germicidal control

City of Longmont Vision, Values & Goals

A description of how the licensee and licensed establishment would contribute to and support the overall vision, values and goals identified by the city and specified in adopted city plans such as Envision Longmont and the Sustainability Plan:

Starbuds will contribute to, and support, the City of Longmont's overall vision, values, and goals as follows:

The Envision Longmont program combines the city's comprehensive plan with its multimodal transportation plan with the goal of creating sustainable and resilient development over the next ten to twenty years. The first goal is to provide livable centers, corridors, and neighborhoods. Starbuds would further this goal by locating in a shopping center where Longmont residents will be able to fulfill other shopping errands in a single trip. Shopping centers help to reduce car trips, improve walkability, increase density, and reduce urban sprawl. The second goal is a complete balanced and connected transportation system. By locating in a shopping center along a main thoroughfare, Starbuds is able to ensure that people will be able to use available public transit and alternate transportation methods to easily reach the store. The third goal is housing, services, amenities, and opportunities for all. Starbuds will facilitate the city's goal by opening its doors to all eligible customers over the age of 21. Starbuds will help to promote diversity and inclusion by giving employment preference to Longmont residents who are minorities or veterans. The fourth goal is a safe, healthy, and adaptable community. Starbuds can contribute to this goal with its carefully crafted security plan. 24 hour surveillance is a strong deterrent to crime, and ensures that persons perpetrating criminal acts are promptly identified and apprehended. In addition, cannabis is viewed by many to have an important role in treating certain ailments and providing a holistic approach to health. The presence of a safe, welcoming environment for Longmont residents to shop for marijuana will provide a more diverse set of health and wellness options for the city. The fifth goal is responsible stewardship of resources. Starbuds will advance this goal by keeping an eye on the community impact of its operations. The operation of a retail marijuana store is a fairly low intensity use for resource consumption. In the cannabis industry, cultivation tends to be the most resource intensive use. While Starbuds does not operate a cultivation in the Longmont area, the business is nonetheless mindful of the environmental impact of high electricity and water usage in cultivation, and will give preference to efficient and sustainable vendors. The sixth goal is job growth and economic vitality through innovation and collaboration. Starbuds will further this goal by creating job opportunities for Longmont residents within its store. The cannabis industry in Colorado is an innovative economic engine which is creating lucrative opportunities for individuals and municipalities alike.

The Longmont Sustainability Program is aimed at providing specific guidance to meet the city's highest priority sustainability goals, and is focused on the near term, over the next ten years.

The plan is focused on the following topics: Air Quality, Built Environment, Community, Economic Vitality, Energy, Food Systems, Natural Environment, Transportation, Waste, Water. Retail marijuana stores typically have a minimal impact on air quality. The odor of marijuana is sometimes a concern for marijuana businesses, though it is more frequently a concern with cultivation or processing facilities. To address odor, Starbuds has included with its application an Odor Management Plan. Starbuds will contribute to the city's goals regarding the built environment by locating in a shopping center, which increases density, supports walkability, and supports the city's public transportation objectives. Starbuds will further the city's community goals by engaging with neighborhood groups and offering hiring preference to minorities and veterans. Starbuds will support economic vitality by providing opportunities to a diverse spectrum of Longmont citizens, providing competitive wages and health care coverage, and fostering career growth through on the job training and internal promotion. Retail marijuana businesses do not require any extraordinary energy usage beyond a typical retail store. Starbuds will endeavor to support energy efficient operation of its facility and give preference to vendors whose products minimize their carbon footprint. Starbuds will have limited impact on the city's food systems. By locating in an existing shopping center, Starbuds will not have a detrimental impact on the natural environment through new development or reduction in the tree canopy. The shopping center location will promote the city's transportation goals by increasing density and thereby increasing the utility of public transportation and alternative transportation options. Retail marijuana stores generally produce a minimal amount of waste. On the rare occasions when marijuana will have to be wasted, Starbuds will abide by the waste regulations set forth by both the Marijuana Enforcement Division and the City of Longmont. Starbuds does not believe its retail store will be a water intensive use, and does not believe that it will contribute to water contamination.