

City of Chula Vista

Cannabis Management Services

March 11, 2019

HdL  Companies

SUBMITTED BY

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I. LETTER OF TRANSMITTAL

March 11, 2019

David Bilby, MSBA, CPFO
Director of Finance/Treasurer
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

Re: Proposal for Cannabis Management Services

Dear Mr. Bilby,

Thank you for the opportunity to submit this proposal for cannabis management services for the City of Chula Vista. The enclosed scope of services provides a comprehensive process for application reviews, merit-based ranking and scoring, and applicant interviews as requested by the City.

HdL was incorporated in 1983 and has over 30 years of experience providing revenue enhancement and consulting services to local governments in California. HdL is a consortium of three companies established to maximize local government revenues by providing audit, compliance, economic development, consulting services and software products. Its audit and consulting services include sales, use and transaction taxes, property taxes, transient occupancy taxes, and a Cannabis Management Program. HdL's systematic and coordinated approach to revenue management and economic data analysis is currently being utilized by over 500 agencies in six states. The firm currently serves 49 counties, 311 cities and 132 transactions tax districts in California.

Our knowledgeable team of professionals have more than 46 years' combined experience in the establishment and implementation of cannabis regulatory programs including establishing land-use regulations, registration processes, operation regulations for cannabis facilities, staffing plans, cost recovery, structuring cannabis business taxes and conducting compliance and financial audits.

We look forward to the opportunity to partner with the City of Chula Vista in developing a strategy which meets your program needs. If you have any questions or require additional information, please feel free to contact me by email at anickerson@hdlcompanies.com or David McPherson at dmcpherson@hdlcompanies.com or by phone at 714.879.5000.

Sincerely,



Andy Nickerson
President, HdL Companies

II. PROPOSED SCOPE OF SERVICES

The City of Chula Vista is seeking assistance from HdL to review and score cannabis business applications, to conduct applicant interviews, and to compile a final report, with scores and merit-based ranking to inform the final selection process. This proposal provides a fixed unit cost for each of these items, though the total cost will vary depending upon the number of applications being reviewed and the number of applicants being interviewed. The scope also includes additional hours for conference calls, technical assistance and subject matter expertise, to be utilized on an as-needed basis at the City's request.

The City has received 136 applications as of February 21st. All applications which the City determines to be complete will be reviewed and scored by HdL. Top scoring applicants will be invited for interviews. Reviews and interviews will each be billed on a per-unit basis.

For purposes of providing the maximum "not to exceed" amount, this proposal assumes all 136 applicants will be reviewed and interviewed, though this is unlikely to be the case. The timeline below anticipates that no more than 60 applicants will be invited for interviews, at 5 per day. Additional interviews will extend this timeline.

Draft Timeline ¹	
January 7	Cannabis Business Permit applications period opens
January 11	Final date for applicants to submit their application to the City
January 11 - 18	City to conduct initial screening
January 18 – March 4	Applicants given 45 to days to submit any missing information
March 8	HdL to take possession of applications
March 13 – May 10	HdL to review applications (<i>assumes 136 applications</i>)
May 13	HdL to report scores and ranking
May 13 – 20	City to mail pass/fail letters. Top applicants invited to interviews.
June 3 – 21	Applicant interviews to begin ²
June 24 – 28	HdL compiles scores and prepares final report to Cannabis Committee
July 1 – 8	Committee to review reports and rankings
July 8 – 12	Committee to report final recommendations to City Manager
July 15 – 19	City Manager to determine licenses to be issued

¹ Timeline is an estimate only and may be subject to change.

² Assumes 60 interviews at 5 per day. Total number of days will depend on the number of applicants to be interviewed.

Objective 1: Application Reviews and Initial Rankings

Applications which have been deemed complete by the City will move forward for a full review by HdL, including scoring and merit-based ranking. Reviews shall identify both strengths and weaknesses of each application as well as any deficiencies or areas of concern. Reviews shall be adequately detailed to inform the subsequent interview process but shall not contain any recommendations for approval or denial, other than a numerical score.

An applicant's point score shall be based on their demonstrated ability to meet or exceed minimum requirements in each category, in accordance with the scoring rubric provided in Attachment A. Applicants must provide detailed information on how they plan to meet these criteria. Applicants will not be allowed to submit any supplemental information to address deficiencies noted by HdL.

Proposed actions described in the applications shall be considered binding conditions of any resulting permit. Failure to meet or comply with any such requirements after a permit has been granted will subject the applicants to penalties and/or revocation proceedings.

Objective 2: Preparation and Interview Panel

HdL will design and conduct an interview process for the highest scoring applicants in each commercial cannabis permit category. The interview panel for the Selection Committee shall be comprised of 2 of the following subject matter experts from HdL: Matt Eaton, Kami Miller, Billie Jo Naysmith, Tim Cromartie, and Mark Lovelace. Interviews shall be one hour long, with a half hour between to allow for reaction, discussion and note taking by the panel. Interviews shall be scheduled for successive days, where possible, with 5 interviews per day.

Objective 3: Preparation of Final Report

HdL shall compile all scores from both the application review process (Objective 2) and the applicant interviews (Objective 3) and shall prepare a final report for the City, which shall inform the final determination of which applicants shall be granted permits. This final report shall be compiled and prepared by HdL's Cannabis Compliance Manager Matt Eaton.

Objective 4: Provide Subject Matter Expertise & Technical Support

It is anticipated that the City may need additional ongoing assistance from HdL on issues yet to be determined. HdL shall provide up to 40 hours of general consulting in the form of conference calls, subject matter expertise or technical assistance, to be utilized on an as-needed basis at the City's request.

Objective 5: Contingency for Additional Reviews and Interviews

It is possible that the City may accept additional applications for unrestricted licenses during the term of this contract. HdL shall provide for up to 15 additional application reviews and interviews at the same per-unit cost if requested by the City.

Background Checks

HdL is qualified to provide supplemental background checks for principals and employees of cannabis businesses as part of the application process. This service is not included as a part of this proposal but can be provided at an additional cost of \$300 per person for owners or managers, and \$150 per person for line staff. This price includes an employee identification card designed by HdL with the City logo which will meet all the state regulation requirements.

Regulatory Compliance Reviews and Financial Audits

HdL's Cannabis Management Team has over 26 years combined experience conducting approximately 16,000 cannabis compliance inspections, financial audits and investigations in Colorado, California and Nevada. HdL can provide annual compliance reviews and financial audits at the following rates for each cannabis business permitted in the City.

- A. Conduct one (1) financial audit annually for each permit at a rate of \$6,000.
- B. Conduct one (1) compliance review annually for each permit at a rate of \$1,250.
- C. Conduct one (1) financial audit and one (1) compliance review annually for each permit at a rate of \$7,250.
- D. Conduct one (1) financial audit and two (2) compliance reviews annually for each permit at a rate of \$8,500.
- E. Conduct one (1) financial audit and three (3) compliance reviews annually for each permit at a rate of \$9,750.
- F. Conduct one (1) financial audit and four (4) compliance reviews annually for each permit at a rate of \$11,000.

Additional Services

This proposal assumes that HdL will not be asked to review any supplemental information provided by applicants, and that HdL will not be a part of any appeal process. Any such additional reports or documentation that may be requested by the City would be in addition to the costs shown in the table below and shall be billed at HdL's hourly rate.

Conflicts of Interest and Non-Disclosure

HdL Companies works solely with public agencies and has no private-sector clients in the cannabis industry. Though not anticipated, should it be determined that HdL has a conflict of interest with an individual associated with an application, HdL shall immediately inform the City so that alternative measures may be taken.

All cannabis business applications will be kept confidential by HdL and will not be shared internally beyond those HdL employees who are required to have access for purposes of conducting reviews or interviews, or for administrative purposes as necessary.

III. COST

The proposed services are broken down into specific line items in the cost table below. This proposal includes certain objectives that would be billed as fixed costs and others that would be billed on a per-unit basis depending upon the number of applicants or businesses. HdL's fees are based on time, materials and travel-related expenses associated with the execution of the services.

The hours and costs in the table below do not include any additional items that are not contemplated by this scope of services. Among these are review of any supplemental materials submitted by applicants, preparation of additional reports or documents, or assistance with appeals. Prices are valid for 90 days from March 8, 2019.

Scope of Service Objectives	Estimated Cost
Objective 1: Provide review, scoring and merit-based ranking for all commercial cannabis business applications	\$2,500 per applicant
Objective 2: Design and prepare interview process, provide support for interview panel, and conduct applicant interviews (2 HdL staff)	\$1,000 per applicant
Objective 3: Compile all scores and prepare final report to the City	\$2,000
Objective 4: Provide up to 40 hours of subject matter expertise and technical assistance, to be used as needed	\$10,000
Objective 5: Provide a contingency for up to 15 additional application reviews and applicant interviews, if needed.	Priced as above, per applicant
ESTIMATE OF COSTS	
Application Reviews (<i>assumes 136 applications</i>)	\$340,000
Applicant Interviews (<i>assumes 136 applicant interviews</i>)	\$136,000
Contingency (15 additional applications and interviews)	\$52,500
Fixed Costs (Objectives 4 and 4)	\$11,000
ESTIMATE OF TOTAL COSTS	Not to Exceed \$539,500

IV. EXPERIENCE AND RESOURCES

Company Profile

Founded in 1983, HdL is a consortium of three companies established to maximize local government revenues by providing audit, compliance, economic development, consulting services and software products. Its audit and consulting services include sales, use and transaction taxes, property taxes, transient occupancy taxes, and a Cannabis Management Program. The firm also provides a variety of enterprise software processing tools for business licensing, code enforcement, animal control, building permits and tracking/billing of false alarms. HdL's systematic and coordinated approach to revenue management and economic data analysis is currently being utilized by over 500 agencies in six states. The firm currently serves 49 counties, 311 cities and 132 transactions tax districts in California.

HdL's key staff has extensive experience serving local government and many have previously held positions in city management, finance, planning, economic development or revenue collection. HdL is a Corporate Partner of the League of California Cities and California State Association of Counties and works extensively with the County Auditor's Association of California, California Society of Municipal Finance Officers (CSMFO) and California Municipal Revenue and Tax Association (CMRTA) on anticipation and planning of programs to strengthen local government revenues.

This close understanding of local government needs coupled with extensive databases and advanced methodology provides for the most relevant, productive and responsive revenue recovery; forecasting; and economic services available.

Our team of professionals has over 46 years of direct experience establishing and implementing cannabis regulatory and taxation programs, including establishing land-use regulations, permit processes, staffing plans, and cost recovery fees; structuring cannabis business tax fees; regulatory compliance; financial audits; and law enforcement training. Our team has conducted over 16,000 cannabis compliance inspections and investigations in Colorado, California and Nevada.

Key Personnel

David McPherson, Cannabis Compliance Director

David McPherson works with local agencies to prepare them to mitigate regulatory issues surrounding Proposition 64 and SB 94. Prior to joining HdL, David served 28 years in local government for the County of Orange and the cities of Newport Beach, San Jose and Oakland. David's experience as a law enforcement officer, compliance auditor, and tax administrator has provided him a wealth of experience that makes him uniquely qualified to manage HdL's Cannabis Management Program. While working for the City of Oakland, he became the first Tax Administrator in the country to successfully tax, regulate and audit medical marijuana businesses. David has over 8 years of experience working with cannabis regulatory programs.

David is one of the state's most recognized experts in cannabis regulatory policies, compliance implementation and tax policies. His unique knowledge in horticulture, processing and dispensary operations while working for the City of Oakland has made him one of the pioneers in creating a Cannabis Management Program. He uses his experience to assist local and state agencies in developing cannabis policies for regulation, compliance, auditing and economic development. He worked closely with the League of Cities on the development of the Medical Cannabis Regulation and Safety Act (MCRSA) and helped shape SB 94, the Medicinal Adult-Use Cannabis Regulation and Safety Act (MAUCRSA).

David provides technical support on cannabis-related matters to the League of Cities, the Police Chief's Association, Rural County Representatives of California and the California State Association of Counties. In addition, David is working collaboratively with the Department of Consumers Affairs, Department of Food & Agriculture, Department of Health Services and the California Department of Tax and Fees Administration on the implementation of best practices for regulating the cannabis industry for local agencies.

David received his Bachelor's Degree in History from California State University, Fullerton and his Master's Degree in Public Administration from California State University, Long Beach. While at Long Beach, he was named "Future Urban Administrator of the Year".

Matt Eaton, Cannabis Compliance Manager

Matt Eaton is the Cannabis Compliance Manager at HdL and plays a critical role in implementing the Cannabis Compliance Program for local agencies. Prior to joining the firm, he was a progressive law enforcement professional with 29 years' experience conducting criminal/regulatory investigations, and corporate/individual background investigations.

While working as a Supervisory Investigator at the Colorado Department of Revenue in the Marijuana Enforcement Division (MED), Matt managed criminal investigators and civilian staff in the Denver Metro and Longmont field offices. During his six-year tenure at the MED, he conducted approximately 10,000 criminal investigations and compliance reviews which included regulatory and financial investigations. In addition, he is a subject matter expert on track and trace systems. He understands the complexity of reviewing data to ensure businesses are in compliance with state and local regulations. Matt was responsible for planning, developing and implementing report and field inspection protocols for the agency. He also played an instrumental role in recommending changes to current regulations and identifying essential language for new legislation in Colorado. Matt is well known for his ability to maintain working relationships with cannabis industry leaders and external stakeholders in resolving issues.

Matt received his Bachelor of Science Degree from Biola University and currently maintains a Colorado Post Certificate. He has also served as an adjunct instructor teaching law enforcement principle related to criminology, correctional processes, procedural law, interviews, interrogations and criminal evidence at AIMS Community College in Greeley, Colorado.

Tim Cromartie, Senior Cannabis Advisor

Tim Cromartie is a Senior Cannabis Advisor at HdL, in which his primary role is providing policy expertise related to cannabis regulatory and tax policies at the state and local level. Prior to joining HdL, Tim served as the legislative representative covering public safety issues for the League of California Cities since 2013, with a heavy emphasis on shaping legislation governing state and local regulation of marijuana. He has been actively involved in educating cities on changes in the law resulting from the Medical Cannabis Regulation and Safety Act, as well as Proposition 64, the Adult Use of Marijuana Act. When these two Acts were merged into a single regulatory structure in 2017, Tim successfully advocated for clarification of local government's regulatory and enforcement authority in the cannabis context, and for related environmental safeguards in cultivation operations, protections against over-concentration of businesses, regulation of testing labs, and the inclusion of fire safety standards and a definition of volatile solvents in state law governing cannabis manufacturing operations. Since then he has been engaged in educating local governments on the more recent Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA), as well as advocating for a reduction in the cumulative state tax rate for cannabis, improvements in the state's track-and-trace program, and the restoration of a statewide cultivation cap.

Prior to the League, he held a variety of positions in the Legislature and state government, including legislative representative for CalPERS Governmental Affairs, legislative director and public safety consultant to former state Senator Gloria Romero, and field representative for Congresswoman Barbara Lee during her term in the state Senate. Mr. Cromartie holds degrees from the University of California at Berkeley (B.A. Political Science) and UC Hastings College of the Law. Tim is an ardent aviation buff and a member of the California Aerospace Museum at the site of the former McClellan Air Force Base in Sacramento.

Billie-jo Naysmith, Cannabis Compliance Manager

Billie-jo Naysmith is a Cannabis Compliance Manager at HdL in which she plays a diverse role in implementing the Cannabis Compliance Program for local agencies in both California and Colorado. Prior to joining the firm, she was a progressive law enforcement professional with 23 years' experience conducting criminal/regulatory investigations, cannabis applicant background investigations and complex financial investigations.

While working in the Office of the Colorado Attorney General as a Criminal Investigator she investigated Financial and Securities Fraud specializing in cannabis business activity. In addition, she worked closely with forensic accountants analyzing financial records to determine if criminal activity occurred.

During her tenure as a Supervisory Investigator at the Colorado Department of Revenue in the Marijuana Enforcement Division (MED), Billie-jo managed criminal investigators and civilian staff in the Denver Metro and Longmont field offices. During her five-year stretch at the MED, she conducted approximately 5,000 criminal investigations and compliance reviews which included regulatory and financial investigations. In addition, she is a subject matter expert on track and trace systems where she has conducted data analysis in order to

assist in complex cannabis regulatory investigations. She understands the complexity of reviewing data to ensure businesses follow state and local regulations. Billie-jo was responsible for assisting in the strategic planning for the division which included providing training for investigators. Furthermore, Billie-jo participated in collaborative rulemaking work groups and focus groups with cannabis industry leaders and external stakeholders to develop best practice regulations. She also provided critical recommendations for the agencies cannabis rules and regulations by addressing key loop holes in the Colorado legislation which was subsequently amended. In addition, Billie-jo formed essential partnerships with federal, state and local law enforcement agencies as well as local licensing authorities.

Billie-jo received her Bachelor of Science Degree in Business Administration from Colorado Christian University where she graduated with the distinction of Suma Cum Laude. She also currently maintains a Colorado POST Certificate.

Mark Lovelace, Cannabis Policy Advisor

Mark Lovelace has 16 years of broad experience in public policy, community engagement and advocacy and is recognized as a leader in advancing the statewide discussion of medical and recreational cannabis as a policy issue in California.

Mark served on the Humboldt County Board of Supervisors from 2009 through 2016 where he was instrumental in developing a comprehensive approach to regulating cannabis, including a voter-approved tax on commercial cultivation and an innovative track and trace pilot program. Mark established and co-chaired the Medical Marijuana Working Group for the California State Association of Counties (CSAC) and helped draft CSAC's legislative platform for cannabis issues. Mark pioneered the first-ever six-County regional summit on cannabis issues in 2015 which resulted in the North Coast Counties Marijuana Policy Statement. His work and input were pivotal in guiding the development of SB 643 and AB 243, two components of the Medical Cannabis Regulation and Safety Act (MCRSA).

Mark has worked extensively with public agencies and statewide associations on cannabis issues, including CSAC, Rural County Representatives of California, the Association of California Water Agencies, the North Coast Resource Partnership, California Department of Fish and Wildlife, the State Water Board, the North Coast Regional Water Board, the Bureau of Cannabis Control, state legislators, the Department of Justice, members of Congress and others. He has led numerous presentations, workshops and panel discussions on cannabis issues and has been a sought-after speaker on the topic for government agencies, community organizations and cannabis industry groups.

Mark received his Bachelor of Science degree in Industrial Design from California State University, San Jose. Prior to his time on the Board, he worked for many years as a respected advocate on land use, planning, development and environmental issues.

Kami Miller, Cannabis Senior Auditor

Kami Miller is a Cannabis Senior Auditor at HdL whose primary role is to ensure cannabis compliance and identify the risk assessment in the supply chain process of each permitted

business. Prior to joining the firm, she served three years as a Marijuana Compliance Manager for the Department of Public Behavior and Health (DPBH) for the State of Nevada. During this time Kami played a key role in Nevada's implementation of its Medical Marijuana Program in which she was responsible for statewide monitoring of medical marijuana facilities that included cultivation, production, testing labs and retail stores.

During her tenure at the DPBH, Kami managed compliance auditors and support staff in the Las Vegas office. She conducted approximately 1,000 compliance and financial inspections for which she developed the inspection protocols documentation to create comprehensive reports. In addition, her experience with various cannabis track and trace systems allowed her to develop industry supply chain practices for the Department of Taxation.

Kami received her Bachelor of Business Administration in E-Commerce and Supply Chain Management from Tennessee State University.

Elizabeth Eumurian, Cannabis Senior Auditor

Elizabeth Eumurian is a Cannabis Senior Auditor at HdL. Her primary role is to conduct financial audits, evaluate cannabis applications and conduct background checks. As part of the audit program, she will be conducting and preparing analytical information through the CATS™ program to prepare Tax Analytical Remittance Reports (TARR) summaries to evaluate under reporting or anomalies in the remittance of tax payments to local jurisdictions.

Elizabeth previously worked as a senior auditor in the entertainment industry. In this role, she executed testing procedures for targeted audit programs, analyzed findings and prepared audit and compliance reports. She also has experience working for a large financial institution analyzing data for reporting anomalies and performing internal audits. Elizabeth has recently done work for Blythe, California City, Coachella, Cotati, Desert Hot Springs, Long Beach, Mammoth Lakes, Moreno Valley, Perris, San Bernardino, and Vallejo.

She earned her Bachelor of Arts degree in History from California State University, Fullerton. She has also received a certificate in CannaBusiness from Oaksterdam University.

Michelle Shaw, Cannabis Compliance Inspector

Michelle is a Cannabis Compliance Inspector at HdL and is tasked with conducting onsite inspections, examinations and other actions to monitor compliance with established standards for local licensed cannabis businesses. Prior to joining HdL, she was a Compliance Specialist Officer at a large, multinational bank where she managed, validated and oversaw the effectiveness and accuracy of numerous compliance issues within the consumer retail space. Throughout her eight years of experience at the bank, she performed onsite assessments of affiliate businesses to determine compliance/non-compliance of their processes and procedures pursuant to bank standards and state regulations.

A graduate of Cypress College, Michelle holds a Foundations of Banking Risk certificate from the Global Association of Risk Professionals and a paralegal certificate from the Southern California College of Business and Law.

Alfredo Marquez, Cannabis Senior Auditor

Alfredo Marquez is a Cannabis Senior Auditor at HdL. His primary role is to conduct financial audits. Alfredo previously worked for Teledyne Technologies analyzing risk assessments for acquiring new businesses and various units in the organization. In this role he worked with people at various levels in the organization and successfully conducted financial, Sarbanes Oxley and compliance audits across North America, Latin America, Europe, and Asia. Alfredo has recently done work for Cotati, Cloverdale, Desert Hot Springs, Mammoth, Perris, and Vallejo. He earned his Bachelor's Degree in Accounting from the University of La Verne.

V. REFERENCES

Steve Mitchell

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Marshall Eyerman

Chief Financial Officer
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Ajay Kolluri

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Darlene Mata

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Clara Miramontes

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VI. ATTACHMENTS

Attachment A: Scoring Rubric for Cannabis Applications

HdL shall use the following scoring rubric to apply points along an “A, B, or C grade” model:

- If an application contains the minimal substance necessary to address the individual criteria in each category, they will receive a minimum baseline score of 70% or above regardless of the quality of their submission on that category. Essentially, work that is minimally complete will receive a “C” grade.
- If an application meets or exceeds the minimal substance to address the individual criteria in each category, and further provides above-average explanation or documentation that corroborates or supports their responses, they will receive a minimum score of 80% or above; or a “B” for above-average work.
- If an application goes well beyond the minimum substance required to address the criteria in each category, and further provides excellent narrative or documentation that demonstrates a strong understanding of the criteria, the underlying concerns on which those criteria are based, and how to ensure all criteria are addressed, then they will receive a score of 90% or above; or an “A” for excellent work.
- Applications which fail to provide the minimum substance necessary to address the various criteria will be given a score of less than 70%. The exact score will depend upon the degree to which the application failed to address the criteria.
- Each reviewer shall have discretion to apply points within each point range (70%-79%, 80%-89%, 90%-100%) based upon both the specific response to the criteria and upon the quality of the application as a whole. The score for each category may be adjusted downward if the reviewer finds information elsewhere in the application that confuses, belies or contradicts the response on a specific point. Likewise, a score may be adjusted upward if the reviewer finds additional information within the application that further documents, supports or strengthens a response.
- The qualifications of the owners is of critical importance in scoring applications. HdL will look for applicants to provide demonstrable and verifiable evidence of experience with legal (State licensed and/or locally permitted) cannabis businesses. Where experience with licensed or permitted businesses does not exist (due to the emerging nature of this newly-legal industry), reviewers shall consider the degree to which demonstrated experience with unlicensed or unpermitted businesses may be relevant and applicable to owning or operating a legal business.
- HdL shall provide a brief written report on each application, which shall include both the overall score, the points awarded for each category, and a narrative of sufficient detail to inform how scores were derived. Each reviewer will document in their review any missing or incomplete information, as well as information or documentation that exceeds minimal requirements. Reviewers’ comments shall reflect both strengths and weaknesses of each application.