

Dear City Council Members, City Manager, Mayor, Police Chief, City Attorney and Members of the press,

I am writing to you as a cannabis industry consultant, co-founder of Leaf Thought Cannabis Consulting Agency, and a former Master's Education school teacher. I have extensive experience in the cannabis sector, and have received multiple requests from applicants to review the application and scoring process to best advise on achieving a perfect score. To my concern, I have found errors within the grading criteria system.

As you may know, the cannabis industry is potentially highly lucrative and could pose a risk for foul play and monetary gain by those in positions of authority. In Section D of the application process titled "Proposed Location", the language states that "additional points will be awarded to applications that exceed the [50 foot] minimum buffer to the nearest **sensitive-use** by a greater distance than other applicants". In addition, it says "additional points will be awarded to applications that exceed the 50-foot minimum **[to the nearest residential zone]** by a greater distance than other applicants". Peculiarly, the application does not specify the number of additional points to be awarded.

It has come to my attention that the Mayor of Manteca owns a property that has been vacant for quite some time and appears to have been reserved for this process. The language in the application process, as it is currently written, could potentially ensure that the Mayor's property would be selected as the winning applicant based on an unspecified number of bonus points.

I find it concerning that applicants are hiring law firms to put together their binders when the entire application process is based on a specific point system. However, when it comes to this peculiar addition, which seems to involve a property owned by the Mayor, the application does not declare the number of bonus points to be awarded. This lack of transparency in the scoring system prevents applicants from understanding their potential scores and raises questions about the true purpose behind this addition.

It appears that the undefined nature of the bonus points could give the city the opportunity to retroactively assign as many points as desired, thereby favoring the Mayor's property. This situation raises concerns about the fairness and transparency of the cannabis application process and could potentially expose the City of Manteca to liability. Furthermore, it could lead to criminal implications for the Mayor and other individuals involved, including charges of fraud.

Upon reviewing the application details and scoring criteria, I have **discovered another significant issue**: It is possible for an empty dirt lot on the outskirts of Manteca to

receive a higher score than an existing, highly qualified building. According to aforementioned section D, applicants will receive these undefined amount of bonus points if they are a greater distance separation from the minimum sensitive-use PLUS additional points if they are a greater distance than the minimum for residential zoning. Due to this language, it is possible for a dirt lot on the outskirts of Manteca, in a poor strategic location, to receive both bonuses and outscore a strategically located, retail building with adequate parking guaranteed to bring in more revenue to the city. By incentivizing remote locations, the city is promoting the potential for burglary and theft.

This creates a major problem for the future success of the cannabis program for the City of Manteca. Clearly, a primary purpose for allowing cannabis licensing is for revenue production purposes through city tax. Allowing a dirt lot to be the highest-scoring application would be detrimental to the city's intention, as well as the approving members of the council and the city manager.

Conclusively, the bonus points in Section D, as they currently stand, should be removed immediately to ensure a fair and transparent application process for all parties involved. As an expert in the cannabis industry, I urge the city of Manteca to address these concerns and rectify the application process to protect the integrity of the city and its officials, as well as to avoid potential liability. And of course, **no scoring system should give a dirt lot and 2-5 years of construction anything near the equivalence of an existing infrastructure that is ready for use.**

Sincerely,

Chris Traina M. Ed.

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Former Master's Education School Teacher