

## EXHIBIT D

# 214 W Commercial Live Entertainment Security Plan 2025

This security plan outlines the measures implemented at 214 W Commercial to ensure the safety and well-being of patrons, staff, and the surrounding community. The goal is to provide a secure, enjoyable and safe environment while complying with all applicable laws and regulations. This plan addresses personnel deployment, risk mitigation strategies, emergency response and CCTV overview.

The most essential aspect of our security plan is directly related to our physical security personnel. All security staff and management will undergo a background check completed by the business before gaining employment with the establishment. This will be completed by Checkr, Good Hire, First Advantage or similar service.

Once a security applicant passes the background check and gains employment, they will then undergo written and hands-on training at their learning pace. This training period will be a minimum of 30 days and will be completed only by the head of security (Zanaan Bennett). Bennett will also be overseeing all security operations and personnel. Bennett was the former Head of security while 1up was in operation. He has an extensive security background in nightlife environments in which he has worked for over twenty five years.

All contracted individuals will have a physical and online file containing all applicable information. This includes DJs, performers, promoters, photographers, videographers and other groups continuously working in the space.

Before the start of each shift, the head of security will perform a briefing with all staff on the night ahead. During this briefing, the head of security will speak to each staff member to ensure they are sober, rested and prepared to work their shift, both physically and mentally. If the head of security feels that any staff members are unable to work, whether it be related to illness, exhaustion, personal crisis or intoxication, they will be deemed ineligible to work that night and sent home. The head of security will then perform further questioning with the employee and

investigate the circumstances to come to either a resolution, disciplinary action or termination of the employee.

In the event any staff member is unfit to work and is sent home, the head of security or member of management will ensure the staff member has a safe method of transportation home.

Staff members must not consume any alcohol, cannabis, or any other substances that would negate their sobriety before and during their scheduled shift.

All staff members will be required to supply management and government/city officials with a valid AAT card and keep it on their person while working.

In regards to patron intoxication, staff must communicate with each other and management when someone is intoxicated and being refused additional alcoholic beverages. From there, the entire team will be required to ensure that the patron does not consume more alcohol, other patrons do not attempt to purchase more alcohol for that patron, and so on. Once a person has been identified, the staff will ensure the patron has a safe method of transportation home.

## **1 HEAD OF SECURITY RESPONSIBILITIES:**

---

- Maintain a security-to-patron ratio of 2:50 during regular operations and increase staffing during special events or peak hours.
- Position security personnel in strategic positions around the venue, such as door man, static posts inside the venue (i.e. four corners and by bathrooms), floaters and CCTV live monitoring.
- Deploy additional personnel for high-risk areas when applicable, such as the bar and dance floor, where conflicts are more likely to arise.
- Exercise efficient communication and task delegation during operations, as well as liaising with management and local authorities.
- Develop procedures for safely removing disruptive individuals, with minimal impact on other patrons.
- Train bartenders beyond basic Alcohol Awareness Training on how to recognize signs of intoxication and refuse service to impaired patrons. This

includes but is not limited to; red, watery eyes, disheveled clothing, sweating, smell of an alcoholic beverage on person, droopy eyelids, lack of eye focus, flushed (red) face, slurred speech etc.

- Maintain a zero-tolerance policy for illegal substances, with proactive searches and cooperation with law enforcement as needed.
- Store all incident reports securely in a locked filing cabinet for a minimum of one year.
- Conduct monthly training sessions for security and bar staff on topics such as conflict de-escalation, recognizing fake IDs, and emergency response.
- Organize role-playing exercises to prepare staff for handling common security challenges.
- Maintain an open line of communication with local police, city officials and code enforcement including providing them with a copy of this security plan.
- Regularly evaluate personnel performance and conduct refresher training to address evolving risks.

## **2 SECURITY PERSONNEL RESPONSIBILITIES:**

---

- Verify government-issued IDs for all patrons to confirm they meet the legal age requirement for entry (twenty one years of age or older).
- Use handheld metal detectors to prevent the introduction of weapons or prohibited items including outside food or beverages.
- Ensure patrons do not enter the establishment wearing prohibited clothing items/accessories. This includes colors (blue/red), cuts, team apparel, sharp/studded items or any imaging/literature that is related to anything racist, homophobic or anti semitic.
- Maintain a controlled guest list and ensure capacity limits are strictly enforced.

- Hold static posts at all points of entry to verify identification, perform bag checks, and ensure only authorized patrons enter the venue.
- Monitor patron behavior upon entry to identify potential risks or signs of intoxication.
- Ensure designated queuing areas with barriers and ensure orderly entry into the venue, ensuring the sidewalk and surrounding areas are free from obstruction.
- Conduct regular patrols throughout the venue, including the dance floor, bar area, restrooms, and VIP sections, to detect and address any disturbances.
- Monitor exits to ensure orderly departures and prevent loitering or altercations outside the venue.
- Ensure employees make it to their vehicles safely, as well as ensuring that the surrounding areas of the venue are free from any persons after the business has closed.
- Maintain detailed reports of all incidents, including altercations, ejections, and injuries. Any/all staff members that are witnesses or have any involvement in any incident must complete an incident report of their own without influence or intimidation from any persons. All incident reports will be retained for a minimum of one year.
- All staff members will work together to ensure all emergency exits are accessible and free from obstruction.
- All staff members will be educated on where to locate fire extinguishers in the event of a fire. ABC fire extinguishers will be located in the front entry foyer, at the bar, in the mop room, office and in the basement.
- As large coats, bags/backpacks are not allowed inside the venue, a coat/bag check will be available to all patrons upon entering the establishment.
- In addition to security training, all management and security staff will obtain and withhold valid CPR and First Aid certification. They will also be trained on how to properly administer Naloxone (Narcan) in the event of a patron overdose. This further equips our staff with the skills and tools needed to respond to medical emergency situations. In addition to extensive training, all

management and staff members will have access to full medical kits. These medical kits will also be available to all patrons upon request.

- Security staff will be trained on how to interact with patrons while upholding the businesses model on exceptional hospitality and customer service. This will include training on the use of “verbal judo” and deescalation to avoid physical altercations at all cost.
- Security staff stationed at the entrances/exits will have a counter to determine how many patrons are within the establishment. The occupancy will not exceed 300 persons.
- Security staff will rotate positions once per hour. This keeps personnel engaged, keeps the blood flowing and reduces fatigue, thus maximizing the working capabilities of the person.
- We will withhold a zero tolerance policy on all types of assault, battery and harassment. The safety, wellbeing and comfortability of our patrons is our number one priority.
- We will also withhold a zero tolerance policy on any possession, use, sale or transfer of illegal substances or materials.
- If a patron is involved with any illegal activity or policy violations, they will be ejected from the premises and placed on a ban or “86” at the head of securities discretion. This may include a thirty day ban, six month ban or lifetime ban.
- If any patron is ejected and/or placed on a ban, they will be ID’ed, photographed and released without detainment. This information will be uploaded to a confidential Google Drive folder. This information will not be shared or distributed without direction from law enforcement.
- If any patron is involved with any assault, battery, drug possession or criminal activity of any kind, they will be detained by security staff as long as it is safe and legal to do so. Law enforcement will then be immediately notified. If the subject is combative or presents a threat to patrons or staff, they will be placed in mechanical restraints and personnel will wait for the arrival of law enforcement.

- If security detains, restrains or goes hands-on with a patron for any reason, they will complete an incident report form at the end of their shift before leaving for the night. Security staff will be trained on how to fill out an incident report as well as how to properly write a narrative.
- All staff will be educated on when it is or is not appropriate to notify law enforcement after an incident. We will ensure public services are not requested if not completely necessary. For instance, law enforcement will not be contacted in the event of petit larceny, verbal altercation, misdemeanor public intoxication etc. The head of security will determine if an online police report needs to be completed, or if a call for service needs to be made as the petty crimes become habitual. In the event of a major crime, (i.e assault with a deadly weapon, battery with a deadly weapon, sexual battery, poisoning/drugging, kidnapping etc). All staff members will be trained on how to contain the crime scene and as to not disrupt any potential evidence. Containment of the crime scene will occur after it has been determined that there is no longer any immediate threat to public safety. Containment of the crime scene will be established during or immediately after calling 911 to report the crime.

### **3 PERSONNEL APPEARANCE AND EQUIPMENT:**

---

- All security personnel wear clearly identifiable uniforms that will be easily recognized by patrons and staff.
- All Security personnel will be equipped with two-way radios for seamless coordination, flashlights for monitoring dark or dimly lit areas, as well as non-lethal tools, such as mechanical restraints and pepper spray, as permitted by local laws, to handle serious incidents.

### **4 CCTV REQUIREMENTS:**

---

214 W Commercial will be equipped with a wired CCTV/surveillance system that will record in and around the venue 24-7. This system will equip the business with high definition video and have night vision capabilities. It will also have a big enough

hard drive to retain a minimum of 30 days of recorded video. Individual cameras will be placed throughout the property, ensuring all areas are recorded and do not allow for any blind spots. A list of camera placements are as followed;

#### **4.1 INTERIOR**

- Door/box office register/POS
- Eye-Level close up camera (for face shots of patrons entering)
- Entry vestibule/foyer
- All bar POS systems
- Full perimeter of bar
- Dancefloor & surrounding seating/lounging areas
- VIP booths
- Emergency exits

#### **4.2 EXTERIOR**

- Front door awning area facing West
- Front door awning area facing East
- East Alley facing South
- South Alley facing East and West
- Dumpster area located at the rear (South) side of the building
- All cameras will be strategically installed and positioned to ensure maximum field of view for each fixture.

#### **4.3 LIVE MONITORING**

- Live monitoring will be an essential part of our security and surveillance plan. During business hours, a security staff member will be positioned in the office and operate the CCTV system. This person will conduct constant observation of all CCTV cameras and will be in contact with all security personnel via two-way radio. This will add additional security supervision from a different perspective and expedite security response in the event of a disturbance or emergency.
- CCTV equipment will NOT be placed anywhere that records inside bathrooms or anywhere that violates rights to privacy. This includes nearby perimeter cameras that may have partial or full view into the bathrooms.
- Any CCTV recordings requested by law enforcement will promptly be downloaded onto a USB flash drive, SSD or similar and relinquished to the

requesting law enforcement entity in a timely manner. The head of security will have a file folder containing blank custodian of records forms in the event law enforcement requires a completed form with the CCTV footage.

I hereby certify that the measures outlined in this plan will be implemented in full and reviewed annually to ensure compliance with all safety standards and regulations.

**Fady Mehanna**  
**Owner Operator**  
**01/11/2025**