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Phone: 907.269.0350

Alaska Marijuana Control Board

Cover Sheet for Marijuana Establishment Applications

What is this form?

This cover sheet **must** be completed and submitted any time a document, payment, or other marijuana establishment application item is emailed, mailed, or hand-delivered to AMCO's main office.

Items that are submitted without this page will be returned in the manner in which they were received.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Wild Flower Holdings, LLC	**License Number:**	10605		
License Type:	Standard Marijuana Cultivation Facility				
Doing Business As:	WILD FLOWERS HOLDINGS				
Physical Address:	2229 Spenard Road				
City:	Anchorage	**State:**	AK	**Zip Code:**	99503
Designated Licensee:	Andrea Gribbin				
Email Address:	wildflowersholdings@gmail.com				

Section 2 – Attached Items

List all documents, payments, and other items that are being submitted along with this page.

Attached Items:	**Wild Flowers operating and comprehensive security plan resubmitted and attached** Wild Flowers will maintain a comprehensive security plan as outlined in 3 AAC 306.710(a) are under video surveillance, access is limited to authorized individuals and the premises is safe and secure at all times. Unescorted members of the public do not enter any restricted access areas. See Attachment A

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Form MJ-01: Marijuana Establishment Operating Plan

What is this form?

An operating plan is required for all marijuana establishment license applications. Applicants should review **Title 17.38 of Alaska Statutes** and **Chapter 306 of the Alaska Administrative Code.** This form will be used to document how an applicant intends to meet the requirements of those statutes and regulations. If your business has a formal operating plan, you may include a copy of that operating plan with your application, but all fields of this form must still be completed per 3 AAC 306.020(c)

What must be covered in an operating plan?

Applicants must identify how the proposed premises will comply with applicable statutes and regulations regarding the following:

- Security
- Inventory tracking of all marijuana and marijuana product on the premises
- Employee qualification and training
- Waste disposal
- Transportation and delivery of marijuana and marijuana products
- Signage and advertising
- Control plan for persons under the age of 21

Applicants must also complete the corresponding operating plan supplemental forms (**Form MJ-03, Form MJ-04, Form MJ-05,** or **Form MJ-06**) to meet the additional operating plan requirements for each license type

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application

Licensee:	Wild Flowers Holdings, LLC	**License Number:**	10605		
License Type:	Standard Marijuana Cultivation Facility				
Doing Business As:	Wild Flowers Holdings				
Premises Address:	2229 Spenard Road				
City:	Anchorage	**State:**	AK	**ZIP:**	99503

Mailing Address:	PO box 221731 99502				
City:	Anchorage	**State:**	AK	**ZIP:**	99502

Primary Contact:	Andrea Gribbin		
Main Phone:	907-223-5824	**Cell Phone:**	Same
Email:	Wildflowersholdings@gmail.com		

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 2 – Security

Review the requirements under 3 AAC 306.710 – 3 AAC 306.720 and 3 AAC 306.755, and identify how the proposed premises will meet the listed requirements.

Describe how the proposed premises will comply with each of the following:

Restricted Access Areas (3 AAC 306.710):

Describe how you will prevent unescorted members of the public from entering restricted access areas:

Wildflowers marijuana cultivation will restrict access to our licensed premises where marijuana or a marijuana product is grown, processed, tested, stored, or stocked. Customers and staff will enter through the front door and check in with Wildflowers staff member. Entrance to restricted access area will be marked by a sign that says "Restricted access area. Visitors will be escorted with a licensed member of Wildflowers staff.

ag

Describe your processes for admitting visitors into and escorting them through restricted access areas:

Visitors will be escorted with a licensed member of Wildflowers. Wildflowers will limit the number of visitors to not more than five visitors for each licensee, employee, or agent of the licensee who is actively engaged in supervising those visitors.
Wildflowers licensee and employees or agent of Wildflowers shall wear a current identification badge bearing the person's photograph. A person under 21 years of age may not enter a restricted access area. Any visitor to the restricted access area will:
(1) show identification as required in 3 AAC 306.350 to prove that person is 21 years of age or older;
(2) obtain a visitor identification badge before entering the re- strict~ access area; and
(3) be escorted at all times by a licensee, employee, or agent of Wildflowers establishment.

ag

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Form MJ-01: Marijuana Establishment Operating Plan

Describe your recordkeeping of visitors who are escorted into restricted access areas:

Before a visitor can access restricted areas, visitors ID will be checked including verifying visitors date of birth. Visitor will be logged into our data based documenting visitors name, time, date and purpose of visitors visit. In addition, licensed staff of Wildflowers escorting visitor shall also log their name and employee ID number in Wildflowers database. When visitors leave, Wildflowers staff will sign out the visitor notating time visitor left.

Provide a copy of a sample identification badge to be displayed by each licensee, employee, or agent while on the premises:

Wild Flowers Visitors Badge

Exhibit MJ-01 - A
AND Exhibit MJ-01-A1

Identification badges, visitor passes, keys and security codes are issued through the ownership or management team have unique id numbers and are the sole property of Wild Flowers and can be revoked at any time due to inappropriate use. Identification badge may not be duplicated or loaned to anyone at any time.

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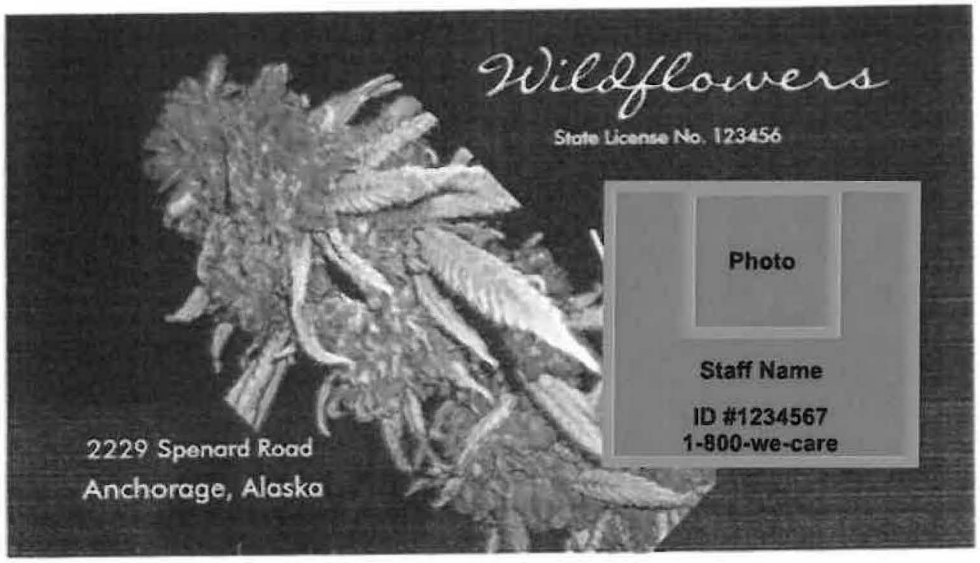
Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Exhibit A -1



During work hours employees will be required to carry an identification badge issued by Wildflowers that is visible and identifies the employee by name and picture 3 AAC 306.710(c).

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Exhibit A

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Security Alarm Systems and Lock Standards (3 AAC 306.715):

Exterior lighting is required to facilitate surveillance. Describe how the exterior lighting will meet this requirement:

Wildflowers shall install and maintain adequate exterior lighting strategically placed to facilitate surveillance described below (photo and exterior lighting plan also attached)

Outdoor HPS Security Super Light
Light up your parking lot with our Outdoor Security Super Light.
• 150W High Pressure Sodium normal power factor.
• Precision die-cast aluminum housing with natural finish.
• 9" open bottom, one-piece acrylic refractor.
• Replaceable twist-lock photo control for automatic dusk-to-dawn operation.
• Arm puts center of light 18" from the mounting surface.
• Can be pole or wall-mounted.

See MJ-01 Exhibit B and Lighting Floor Plan MJ-01 Exhibit C

AG

An alarm system is required for all license types. Describe the security alarm system for the proposed premises:

Wildflowers will have a security alarm system on all exterior doors and windows; and continuous video monitoring as detailed in in 3 AAC 306.720. Wildflowers will maintain security policies and procedures that are designed to prevent diversion of marijuana or product and prevent loitering. Wild flowers will have additional security devices including a motion detector and panic button to enhance security of licensed premises.

There are no windows in secure access areas AG

The alarm system must be activated on all exterior doors and windows when the licensed premises is closed for business. Describe how the security alarm system meets this requirement:

When alarm is activated by a security breech , AG
an alarm goes off notifying 24 hour security monitoring company who then notifies pre authorized Wildflowers Staff who then must provide a predetermined password to security monitoring company identifying if the security breach was a accident or if law enforcement is to be notified. If there is no answer from designated Wildflowers staff within 5 minutes the security monitoring company shall call police dispatch to the premises. the central monitoring station does not meet criteria, the police dispatch will continue. The authorized employee will be notified and directed to the premise to follow the protocol directed by the police. Before the authorized employee leaves, an inspection of the entire premise will be executed and verify no marijuana product was compromised. If so, after all issues are resolved, the authorized employee will arm the system. Employee is required to complete incident report.

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Form MJ-01: Marijuana Establishment Operating Plan

Describe your policies and procedures for preventing diversion of marijuana or marijuana product:

Active marijuana produced will be stored in a locked safe storage area of the building until sale. Wildflowers will only sell product to licensed marijuana dispensaries and manufacturing facilities. All Marijuana will be tracked down to the gram with MJ Freeways Seed to Sale software.

Please see MJ-01 Attachment A for Supplemental Information

Describe your policies and procedures for preventing loitering:

Wildflowers will post a no Trespassing / Loitering sign. Signs posted at entrances. Non authorized personnel will not be allowed to loiter on the property

Please see MJ-01 Attachment A for Supplemental Information

Describe your policies and procedures regarding the use of any additional security device, such as a motion detector, pressure switch, and duress, panic, or hold-up alarm to enhance security of the proposed premises:

Wildflowers will have a state of the art security system utilizing both door and window sensors as well as motion detectors with cameras installed in the restricted area. If any of the alarms are tripped while the security system is active our 24 hour monitoring company attempts one verbal password confirmation. If the password is not verified Wildflowers monitoring company immediately notifies local law enforcement for dispatch to Wildflowers location.
Please see MJ-01 Attachment A for Supplemental Information

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Form MJ-01: Marijuana Establishment Operating Plan

Describe your policies and procedures regarding the actions to be taken by a licensee, employee, or agent when any automatic or electronic notification system alerts a local law enforcement agency of an unauthorized breach of security:

If Wildflowers alarm system is activated the licensee or designated staff member will wait for law enforcement to arrive and clear the area. Any information requested by the police related to the break in such as video surveillance will be turned over to police as soon as possible and a written incident report written up and kept on file. ag

Video Surveillance (3 AAC 306.720):

All licensed marijuana establishments must meet minimum standards for surveillance equipment. Applicants should be able to answer "Yes" to all items below.

Video surveillance and camera recording system covers the following areas of the premises:		Yes	No
Each restricted access area and each entrance to a restricted access area	ag	☒	☐
Both the interior and exterior of each entrance to the facility	ag	☒	☐
Each point of sale area	ag	☒	☐

Each video surveillance recording:		Yes	No
Is preserved for a minimum of 40 days, in a format that can be easily accessed for viewing	ag	☒	☐
Clearly and accurately displays the time and date	ag	☒	☐
Is archived in a format that does not permit alteration of the recorded image, so that the images can readily be authenticated	ag	☒	☐

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Form MJ-01: Marijuana Establishment Operating Plan

Describe how the video cameras will be placed to produce a clear view adequate to identify any individual inside the licensed premises, or within 20 feet of each entrance to the licensed premises:

A video surveillance and camera recording system will be installed in and around the marijuana cultivation facility to allow at minimum, a 20' visible view of ingress and egress access points.
. A camera will be placed:
In view of each restricted access area and each entrance to a restricted access area. In view of each entrance to the exterior of the licensed premises.
In view of the area where marijuana waste is processed.
Within 20 feet of each entrance to the licensed premises as to produce a clear and adequate view to identify any individual inside the facility.
Both the interior and the exterior of each entrance to the facility will be under surveillance by video cameras. Anywhere marijuana is grown, cured, or where marijuana waste is destroyed will have a camera placement in the room facing the primary entry door, and in adequate fixed positions, at a height that will provide a clear, unobstructed view of the regular activity without obstruction. ag

Describe the locked and secure area where video surveillance recording equipment and records will be housed and stored and how you will ensure the area is accessible only to authorized personnel, law enforcement, or an agent of the board:

Video surveillance recording equipment and records will be housed and stored within the storage area which restricts access with a commercial grade, non-residential door lock with key-code entry, for which, only the manager will be able to access. Within this room, all video surveillance recordings will be secured in a locked metal cabinet. ag

Location of Surveillance Equipment and Video Surveillance Records:		Yes	No
Surveillance room or area is clearly defined on the premises diagram	ag	☒	☐
Surveillance recording equipment and video surveillance records are housed in a designated, locked, and secure area or in a lock box, cabinet, closet or other secure area	ag	☒	☐
Surveillance recording equipment access is limited to a marijuana establishment licensee or authorized employee, and to law enforcement personnel including an agent of the board	ag	☒	☐
Video surveillance records are stored off-site	ag	☒	☐

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Form MJ-01: Marijuana Establishment Operating Plan

Business Records (3 AAC 306.755):

All licensed marijuana establishments must maintain, in a format that is readily understood by a reasonably prudent business person, certain business records. Applicants should be able to answer "Yes" to all items below

Business Records Maintained and Kept on the Licensed Premises:	Yes	No
All books and records necessary to fully account for each business transaction conducted under its license for the current year and three preceding calendar years; records for the last six months are maintained on the marijuana establishment's licensed premises; older records may be archived on or off premises	☒	☐
A current employee list setting out the full name and marijuana handler permit number of each licensee, employee, and agent who works at the marijuana establishment	☒	☐
The business contact information for vendors that maintain video surveillance systems and security alarm systems for the licensed premises	☒	☐
Records related to advertising and marketing	☒	☐
A current diagram of the licensed premises including each restricted access area	☒	☐
A log recording the name, and date and time of entry of each visitor permitted into a restricted access area	☒	☐
All records normally retained for tax purposes	☒	☐
Accurate and comprehensive inventory tracking records that account for all marijuana inventory activity from seed or immature plant stage until the retail marijuana or retail marijuana product is sold to a consumer, to another marijuana establishment, or destroyed	☒	☐
Transportation records for marijuana and marijuana product as required under 3 AAC 306.750(f)	☒	☐

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Form MJ-01: Marijuana Establishment Operating Plan

A marijuana establishment is required to exercise due diligence in preserving and maintaining all required records. Describe how you will prevent records and data, including electronically maintained records, from being lost or destroyed:

A digital copy of all business transactions, log books that will state the name, date and time of each visitor, a current employee list that will include the full name of each employee, as well as their marijuana handlers card number will be scanned and kept on the Companies computer, external hard drive and backed up in a cloud storage system. All video surveillance will be kept in a cloud storage program. MJ Freeway will maintain a back up of all Seed to Sale data in their cloud storage system. Records to fully account for all business transactions for the current year and 4 proceeding years will be kept on the license property.

Please see Attachment A for Supplemental Information

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Form MJ-01: Marijuana Establishment Operating Plan

Section 3 – Inventory Tracking of All Marijuana and Marijuana Product

Review the requirements under 3 AAC 306.730, and identify how the proposed establishment will meet the listed requirements.

All licensed marijuana establishments must use a marijuana inventory tracking system capable of sharing information with the system the board implements to ensure all marijuana cultivated and sold in the state, and each marijuana product processed and sold in the state, is identified and tracked from the time the marijuana propagated from seed or cutting, through transfer to another licensed marijuana establishment, or use in manufacturing a product, to a completed sale of marijuana or marijuana product, or disposal of the harvest batch of marijuana or production lot of marijuana product.

Applicants should be able to answer "Yes" to all items below.

Marijuana Tracking and Weighing:	Yes	No
A marijuana inventory tracking system, capable of sharing information with the system the board implements to ensure tracking for the reasons listed above, will be used	☒	☐
All marijuana delivered to a marijuana establishment will be weighed on a scale certified in compliance with 3 AAC 306.745	☒	☐

Describe the marijuana tracking system that you plan to use and how you will ensure that it is capable of sharing information with the system the board implements:

MJ Freeway will be the Seed to Sale software company we use to comply with 3 AAC 306.730, Marijuana inventory tracking system. MJ Freeway is compatible with Metre, the states Marijuana tracking system. They guarantee to meet or exceed Alaska's AMCO Marijuana inventory tracking requirements.

Please see Attachment A for Supplemental Information

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 4 – Employee Qualification and Training

Review the requirements under 3 AAC 306.700, and identify how the proposed establishment will meet the listed requirements.

A marijuana establishment and each licensee, employee, or agent of the marijuana establishment who sells, cultivates, manufactures, tests, or transports marijuana or a marijuana product, or who checks the identification of a consumer or visitor, shall obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment.

Applicants should be able to answer "Yes" to all items below.

Marijuana Hander Permit:	Yes	No
Each licensee, employee, or agent of the marijuana establishment who sells, cultivates, manufactures, tests, or transports marijuana or marijuana product, or who checks the identification of a consumer or visitor, shall obtain a marijuana handler permit from the board before being licensed or beginning employment at the marijuana establishment ag	☒	☐
Each licensee, employee, or agent who is required to have a marijuana handler permit shall keep that person's marijuana handler permit card in that person's immediate possession (or a valid copy on file on the premises of a retail marijuana store, marijuana cultivation facility, or marijuana product manufacturing facility) when on the licensed premises ag	☒	☐
Each licensee, employee, or agent who is required to have a marijuana handler permit shall ensure that that person's marijuana handler permit card is valid and has not expired ag	☒	☐

Describe how your establishment will meet the requirements for employee qualifications and training:

Wildflowers employees will acquire and maintain a current Alaska marijuana handler permit as required in 3 AAC 306.320. Training on MJ Freeway software and equipment.

ag

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Designated Licensee:	Andrea Gribbin				
Email Address:	wildflowersholdings@gmail.com				

Section 2 – Attached Items

List all documents, payments, and other items that are being submitted along with this page.

Attached Items:	**Wildflowers AMCO Email Request for: MJ-01 Operating Plan** **9/18/16 Revision** **Please see Wildflower's responses to your additional requests.** **To add clarity, each item you've requested will be broken down by numbers and by the date you've requested additional information. Attached are direct, specific answers as defined by statute:** **See attachments:** **9/18/2016 Response MJ-01 -1** **Entire page 12 and 13; based on the answers given on this page, you do not have adequate waste disposal procedures.** **9/18/2016 Response MJ-01 - 2.** **Per 3 AAC 306.020(c) a marijuana establishment license application must include the applicant's operating plan....for.... (4) waste disposal.** **9/18/2016 Response MJ-01 - 3.** **3 AAC 306.740 further addresses waste disposal. Please re-read the regulations and resubmit this page clearly stating your waste disposal procedures.** **9/18/2016 Response MJ-01 - 4. Page 15, second box; please re-read the question and provide an answer that is relatable to the question being asked.** **Wildflowers has adopted approved publicly posted applications into its own P & P**

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 5 – Waste Disposal

Review the requirements under 3 AAC 306.740, and identify how the proposed establishment will meet the listed requirements.

Applicants should be able to answer "Yes" to the statement below.

Marijuana Waste Disposal:	Yes	No
The marijuana establishment shall give the board at least 3 days notice in the marijuana inventory tracking system required under 3 AAC 306.730 before making the waste unusable and disposing of it	[X]	[ ]

Describe how you will store, manage, and dispose of any solid or liquid waste, including wastewater generated during marijuana cultivation, production, process, testing, or retail sales, in compliance with applicable federal, state, and local laws and regulations:

Wildflowers response to AMCO's RFI MJ-01-1 :
This form, MJ-01, page 12, as identified this page, MJ-01 page 12, refers to 3 ACC 306.730 not AMCO's request for information related to MJ-01 3 ACC 306.740., however, here is another response to AMCO's RFI for 3 ACC 306.740
Wildflowers will store, manage and dispose of any solid or liquid waste, including wastewater and other waste determined by the Board in compliance with applicable federal, state and local laws and regulations as outlined in 3 AAC 306.740(a).
Dream Green Farms will ensure that health and safety standards are met during the waste disposal process by ensuring that personal protective equipment (PPE) is used and reasonable precautions are taken while storing, managing and disposing of solid or liquid waste as outlined in 3 AAC 306.740.
See Attachment A for Continued Information

Describe what material or materials you will mix with the ground marijuana waste to make it unusable:

Compostable Material:
Sawdust Non-Compostable Material:
Paper Product Cardboard Waste
Plastic Waste

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

Attachment A (1)
Storage, Management & Disposal of Waste Continued:
Waste is defined as marijuana plant waste, including roots, stalks, leaves, and stems that have not been processed with a solvent, solid marijuana sample plant waste in the possession of a marijuana testing facility and other waste as determined by the Marijuana Control Board. We anticipate having the following waste by-products from the facility activity:
1 . Waste from marijuana flowers, trim, and solid plant materials;
2 . Wastewater generated dudng cultivation and processing;
3 . Marijuana that is identified as infected or fails to meet quality testing; and 4 . Marijuana plant waste, including roots, stalks, leaves, and stems.
While handling marijuana waste and wastewater through the storage, processing, and disposal process, employees will be trained in proper disposal methods and wear PPE's including nitrate gloves, eye glasses, clean clothing and other requirements as needed. Employees are required to follow health standards as outlined in 3 AAC 306.735 including maintaining a clean working environment, maintaining personal hygiene, avoiding contaminating areas, and ensuring waste disposal equipment is adequately maintained.
Once solid waste is made unusuable per 3 AAC 306.740 it will be taken to a solid waste facility or transfer station or incinerator and a record of the final destination will be maintained as part of the business record (3 AAC 306.470(c)(2). Testing samples returned to the facility after required testing will be disposed of in the same manner as listed above.
In the case of a waste disposal emergency such as pests, molds, accidents or other comparable situations, the solid plant waste will be separated from all other waste and stored in a separate bins until a Marijuana Control Board staff and/or Director authorizes an immediate disposal as outlined in 3 AAC 306.740(c)(1). Procedures on waste disposal will be followed for the emergency disposal situation and sanitary measures will take place as applicable.
Ownership and Management will give at least three (3) days notice to the MC Board before disposing of any marijuana waste by logging the affected products In the marijuana inventory tracking system, Metrc.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

Attachement A (2)

Waste is defined as marijuana plant waste, including roots, stalks, leaves, and stems that have not been processed with a solvent, solid marijuana sample plant waste in the possession of a marijuana testing facility and other waste as determined by the Marijuana Control Board. We anticipate having the following waste by-products from the facility activity:

1 . Waste from marijuana flowers, trim, and solid plant materials;
2 . Wastewater generated dudng cultivation and processing;
3 . Marijuana that is identified as infected or fails to meet quality testing; and 4 . Marijuana plant waste, including roots, stalks, leaves, and stems.

While handling marijuana waste and wastewater through the storage, processing, and disposal process, employees will be trained in proper disposal methods and wear PPE's including nitrate gloves, eye glasses, clean clothing and other requirements as needed. Employees are required to follow health standards as outlined in 3 AAC 306.735 including maintaining a clean working environment, maintaining personal hygiene, avoiding contaminating areas, and ensuring waste disposal equipment is adequately maintained.

Once solid waste is made unusuable per 3 AAC 306.740 it will be taken to a solid waste facility or transfer station or incinerator and a record of the final destination will be maintained as part of the business record (3 AAC 306.470(c)(2). Testing samples returned to the facility after required testing will be disposed of in the same manner as listed above.

In the case of a waste disposal emergency such as pests, molds, accidents or other comparable situations, the solid plant waste will be separated from all other waste and stored in a separate bins until a Marijuana Control Board staff and/or Director authorizes an immediate disposal as outlined in 3 AAC 306.740(c)(1). Procedures on waste disposal will be followed for the emergency disposal situation and sanitary measures will take place as applicable.

Ownership and Management will give at least three (3) days notice to the MC Board before disposing of any marijuana waste by logging the affected products In the marijuana inventory tracking system, Metrc.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

Attachment A (3)
Storage, Management & Disposal of Waste Continued.
Wastewater
Wastewater will be disposed of following the wastewater procedure listed below or recycled through a reverse osmosis system (i.e. RO System). The RO system will be the primary method of wastewater management with a secondary wastewater disposal system to supplement as needed.
Reverse Osmosis System- Wastewater ready for disposal will be pumped out of the plant reservoir system into a five (5) gallon waste bucket then transferred into 55 gallon drum reservoirs feeding into the reverse osmosis system. The system will filter the solution, removing sediment and impurities so that the water can be recycled and reused. Once water is filtered it will be stored in clean water reservoirs to be used in future cultivation facility operations. Waste buckets will be labeled =Wastewater" and use red to indicate it as part of the waste disposal system as outlined above. Sample reverse osmosis system below:
Hydro Logic Evolution Reverse Osmosis 1000 w1330 Gallon Caged IBC Tote Reservoir & Uline 55 Gallon Drum Reservoir (or comparable)
Wastewater Disposal Plan- Wastewater ready for disposal will be pumped out of reservoirs or taken from prep sinks (i.e. areas preparing fertilizers, chemicals) and placed in waste disposal buckets with red labels.

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

Attachment A (4)

Storage, Management & Disposal of Waste Continued): Buckets will be transferred into commercial grade 55 gallon drums with sealable lids using all safety and sanitation methods listed in the solid waste section above. If the RO system is not working the drums will be stored on-site within the restricted hallway until the RO system is operable and able to process the wastewater. Wastewater will also be transferred in sealed 55 gallon drums to a waste water facility as necessary.

Waste disposal system management is the responsibility of the Cultivation Manager and any faulty materials or breakdowns will be promptly attended too. Authorized employees participating in the operation and procedure of waste disposal will be trained on all procedures, understand state, federal and local laws and regulation pertaining to waste disposal and report any discrepancies in procedures to the Cultivation Manager to ensure proper steps are taken including; a thorough investigation, cleanup efforts, re-training or other steps as required.

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(Additional Space as Needed)

Attachment B

Process for Rendering Waster Unusable Continued:

After the required three (3) day waiting period and the Board has approved for disposal, waste material will be combined with a compose. Marijuana solid waste will be ground up using a commercial grinder and mixed with at least an equal amount of one of the materials listed above.

A AFMG-24 Mixer Grinder wl 150 lb. Hopper (or comparable) Once the marijuana is ground up and combined with a material listed above making it unusable, it will be placed in closed, red waste bags and removed promptly from the premises. Unusable solid waste will be taken to a solid waste facility or transfer station or incinerator and a record of the final destination will be maintained as part of the business record (3 AAC 306.470(c)(2). Testing samples returned to the cultivation facility after required testing will be disposed of in the same manner as listed above.

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Marijuana waste must be rendered unusable for any purpose for which it was grown or produced before it leaves the marijuana establishment. Describe the process or processes that you will use to make the marijuana plant waste unusable:

Wildflowers uses every single active part of every MJ plant for its cultivation and manufacturing process. There is no active waste, ever.

However, just in case an anomaly occurs:

Please see Attachment A for Supplemental Disposal Information

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Form MJ-01: Marijuana Establishment Operating Plan

Section 6 – Transportation and Delivery of Marijuana and Marijuana Products

Review the requirements under 3 AAC 306.750, and identify how the proposed establishment will meet the listed requirements.

Applicants should be able to answer "Yes" to all items below

Marijuana Transportation:	Yes	No
The marijuana establishment from which a shipment of marijuana or marijuana product originates will ensure that any individual transporting marijuana shall have a marijuana handler permit required under 3 AAC 306.700	☒	☐
The marijuana establishment that originates the transport of any marijuana or marijuana product will use the marijuana inventory tracking system to record the type, amount, and weight of marijuana or marijuana product being transported, the name of the transporter, the time of departure and expected delivery, and the make, model, and license plate number of the transporting vehicle	☒	☐
The marijuana establishment that originates the transport of any marijuana or marijuana product will ensure that a complete printed transport manifest on a form prescribed by the board must be kept with the marijuana or marijuana product at all times during transport	☒	☐
During transport, any marijuana or marijuana product will be in a sealed package or container in a locked, safe, and secure storage compartment in the vehicle transporting the marijuana or marijuana product, and the sealed package will not be opened during transport	☒	☐
Any vehicle transporting marijuana or marijuana product will travel directly from the shipping marijuana establishment to the receiving marijuana establishment, and will not make any unnecessary stops in between except to deliver or pick up marijuana or marijuana product at any other licensed marijuana establishment	☒	☐
When the marijuana establishment receives marijuana or marijuana product from another licensed marijuana establishment, the recipient of the shipment will use the marijuana inventory tracking system to report the type, amount, and weight of marijuana or marijuana product received	☒	☐
The marijuana establishment will refuse to accept any shipment of marijuana or marijuana product that is not accompanied by the transport manifest	☒	☐

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Form MJ-01: Marijuana Establishment Operating Plan

Describe how marijuana or marijuana product will be prepared, packaged, and secured for shipment:

Wildflowers will utilize the following locked, safe and secured storage compartments when transporting marijuana and marijuana product as outlined in 3 AAC 306.750.

Wildflowers will use all cannabis from Wildflowers cultivation for its own internal manufacturing process and retail sale of flower its customers.

No shipment, packaging or prep needed for the sale of Wildflowers "Flower" to another facility.

Wildflower internal flower sales will be 1st tested by a State Licensed approved MJ testing facility as defined by Alaska Statute prior to the sale of any medicine to Wildflowers customers.

Please see Attachment MJ-01 D for Supplemental Information

Describe the type of locked, safe, and secure storage compartments that will be used in any vehicles transporting marijuana or marijuana product:

Video surveillance recording equipment and records will be housed and stored within the storage area which restricts access with a commercial grade, non-residential door lock with key-code entry, for which, only the manager will be able to access. Within this room, all video surveillance recordings will be secured locked metal cabinet.

Please see Attachment A for Supplemental Information

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Cover Sheet for Marijuana Establishment Applications

What is this form?

This cover sheet **must** be completed and submitted any time a document, payment, or other marijuana establishment application item is emailed, mailed, or hand-delivered to AMCO's main office.

Items that are submitted without this page will be returned in the manner in which they were received.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Wild Flower Holdings, LLC	**License Number:**	10605		
License Type:	Standard Marijuana Cultivation Facility				
Doing Business As:	WILD FLOWERS HOLDINGS				
Physical Address:	2229 Spenard Road				
City:	Anchorage	**State:**	AK	**Zip Code:**	99503
Designated Licensee:	Andrea Gribbin				
Email Address:	wildflowersholdings@gmail.com				

Section 2 – Attached Items

List all documents, payments, and other items that are being submitted along with this page.

Attached Items:	**Response to AMCO's additional request for dated 8/23/16:** **"corrections submitted have been received and uploaded, however, I did not see a corrected page 15, second box, of MJ-01 as asked in the below email. The answer given on the cover sheet submitted with corrections regarding this of "Wildflowers has adopted approved publicly posted applications into its own P & P" does not answer the question. Therefore MJ-01 still incomplete** **Please see attached as requested page 15, second box MJ-01 and Exhibits MJ-01 E** **7 pages incluing Cover** AG

OFFICE USE ONLY					
Received Date:		Payment Submitted Y/N:		Transaction #:	

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Describe how marijuana or marijuana product will be prepared, packaged, and secured for shipment:

Already Submitted & Deemed Complete per AMCO - No corrections

AG

Describe the type of locked, safe, and secure storage compartments that will be used in any vehicles transporting marijuana or marijuana product:

When transferring inventory (or product) to a testing facility, product manufacturing or retail facility based on purchase orders from licensed marijuana establishments the electronic inventory tracking system labels will allow the packaged Items to be transferred legally with a transport manifest. Product will be placed within a sealed and tamper-evident shipping container, affixed with a proper label on the shipping container and with a valid transport manifest attached at all times (3 AAC306.435).
Wildflowers will utilize both a third party delivery service such as (Valkyrie Security or comparable) as well as authorized employees to transport and deliver marijuana and marijuana product to and from the facility.
All marijuana packaging must be uniform with labels secure and prominently displayed. No packaging products or materials can be used in the cultivation, storage, and/or sale process unless accepted into the Cultivation Facility by a member of Management.
Only usable marijuana will be packaged at the Cultivation Facility. Any packaging will not be tampered with. Any packaging done at the Cultivation Facility will be performed in an area specifically set aside for packaging. All necessary sanitation, as described in the Sanitation Policy, will be executed appropriately.
See Attachment MJ-01 E for Continued Information Packaging/Re-packaging Marijuana.

AG

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(Additional Space as Needed):

Attachment MJ-01 E -1

Only usable marijuana will be packaged at the Cultivation Facility. Any packaging will not be tampered with. Any packaging done at the Cultivation Facility will be performed in an area specifically set aside for packaging. All necessary sanitation, as described in the Sanitation Policy, will be executed appropriately.

The Cultivation Facility will package marijuana for sale to other marijuana establishments in standard units in accordance with the Alaska Administrative Code and the MCB regulations. If the Cultivation Facility is selling usable marijuana in bulk for repackage and sale to the consumer by the other marijuana establishment, the wholesale standard unit will not exceed five (5) pounds. If the usable marijuana is being packaged for retail sale at a dispensary, the standard unit will not exceed one (1) ounce.

Cultivation Facility agents can create unit-size loose flowers, rolls, or other forms of unit-sized usable marijuana. Unit packaging for marijuana flower will be done in accordance with industry standards.

After agents package bulk flower into units, it will be placed In sanitized, air-tight containers, labeled with all compliant labeling information, and given a barcode for the marijuana inventory control system. After all usable marjuana has been placed in bins and labeled it will be moved to the secure storage area.Scales

The Cultivation Facility shall use certified scales in compliance with the Alaska Weights and Measures Act, and will maintain registration and inspection reports at the Cultivation Facility. Upon request by the MCB, Ownership and Management will provide a copy of the registration and inspection reports of the certified scales to the MC Board for review. Product wiU be weighed on scales certified by the Alaska Department of Weights & Measures required by state and local regulations & statutes (AS 45.75.080, 3 AAC 306.745). Registration and inspection reports will be kept on the licensed premise and will be available upon request to the Alcohol & Marijuana Control Board staff and/or Director. Scales will be checked for accuracy after weighing each product by placing a calibration weight on the scale, equal to what is being weighed (i.e. 3.5 gram calibration weight = 3.5 grams of product) up to rive (5) pounds, this will ensure that the scale is accurate and that each product has a weight control measure in place.

Any scale that does not meet quality control standards will be replaced before any more product is weighed. Scales will be upgraded and certified as needed to ensure accurate weight. Two (2) scales will be used to ensure large and small products will have accurate weight. The following scales will be used:

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

Attachement MJ-01 E-1
Shipping and Transport
Scales
A&D Legal Trade Large Scale (or comparable per requirements, 3 AAC 306.745) A&D FX 1200iN Integrated Scale (or comparable per requirements, 3AAC 306.745)
Prepping Material
Employees will ensure they have met sanitary guidelines for handling marijuana including; gloves, smocks, shoes, hair nets and using sanitary instruments before handling and packaging marijuana product (3 AAC 306.440). Marijuana will be handled by authorized personnel who have been trained on how to use and quality check the scales as well as can use the inventory tracking system to track and create the necessary labels and barcodes for packaging, transportation and sale. Authorized employees will take curing jars that are used in the final drying and curing process of the marijuana and weigh out product directly from the container according to desired quantities. Product will be weighed out into a weighing container/tray and then placed into packaging depending on its purpose; testing, samples, wholesale, and pre-packaged without re-packaging. Marijuana will be weighed according to the specifications from the buying licensed marijuana establishment.
The product will be entered into categories created in the electronic inventory tracking system by authorized personnel. Product will be entered into the system by strain, type of product suchas bud, trim, sugar leaf and etc, and in categories such as sativa, indica or prepackaged. The total AG **amount of each product will be maintained in the inventory tracking system and new labels will be created to reflect the new packaging of the product.**

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(Additional Space as Needed):

Shipping and Transport
Attachement MJ-01 E-1

Testing Packaging
Amounts for testing will be tracked in their own category within the electronic inventory tracking system and will be given new labels reflecting their inventory status. Batches for testing are determined by the licensed testing facility and will be seven (7) grams per five (5) pound batches unless noted otherwise by the licensed testing facility. All marijuana prepared for testing will be packaged in blue containers in order to differentiate between product for testing and product for sale.

AG

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(Additional Space as Needed):

Shipping and Transport
Attachement MJ-01 E -1

Sample container below:
Pharmaceutical Grade Child Resistant Pop Top (or comparable)
(These bottles are made in the USA and are certified child resistant.
Appropriate paperwork is available upon request).

MindRyte-Alaska-Candy_Proof

Highlight Rot

16

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(Additional Space as Needed):

Shipping and Transport
Attachement MJ-01 E-1

Locked, Safe, Secured Storage Compartment Continued:
Valkyrie Security and Asset Protection Inc. (current security company) or other similar transport company will use armored staff and armored vehicles as part of Wildflowers delivery protocol. Their transport staff will secure product in locked containers with tamper resistant locks prior to leaving the licensed facility. All locked containers will be with armed transport staff at all times and only removed from vehicle upon arrival to receiving licensed facility. The tamper resistant locks will only be removed in the presence of an authorized person at the receiving licensed facility.

Authorized employees will utilize the following locked, safe and secured storage compartments when transporting marijuana and marijuana product as outlined in 3 AAC 306.750.

Shipping Containers & Accessories:
Lockable storage container or one of comparable features and quality:
Deluxe Security Tape (Tamper Proof Tape) featuring a highly visible "opened" sticker when tampered with including:

Plastic Truck Seals (or similar) featuring a consecutively numbered, tamper resistant band with a 55 lbs breaking strength, double clicking locking mechanism for strength:

Locked, safe and secure storage compartments that will be used in vehicles transporting marijuana or marijuana products.

All marijuana to be transported and delivered to and from a marijuana establishment will be logged in the inventory tracking system and will record the type, amount and weight, name of the transporter, the time of departure and expected delivery as well as the make, model and license plate number of the transporting vehicle.
In order to further enhance the security of transportation employees and the community while transporting marijuana and cash, employees will dress in plain clothes and utilize unmarked vehicles in order to not call unnecessary attention to themselves. Any vehicle transporting marijuana products will be unmarked and inconspicuous. Vehicles that will be used for transportation of marijuana products will contain a secure and sanitary area affixed to the inside of the transportation vehicle that will lock and will ensure the marijuana products cannot be seen by anyone from outside of the transportation vehicle. The secure storage area within the transportation vehicle will be sanitized before and after each use.
Wildflowers understands and appreciates that the transportation of marijuana carries a large responsibility and requires careful planning. Wildflowers Team takes the transportation of marijuana products very seriously as the safety of the public, the transporter, and the products are of the utmost importance to us. Whether transporting marijuana products to and from a testing facility or to another marijuana establishment, our Company will always practice safety, care, organization, patience, and diligence when driving products around the State of Alaska.

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Form MJ-01: Marijuana Establishment Operating Plan

Section 7 – Signage and Advertising

Describe any signs that you intend to post on your establishment with your business name, including quantity and dimensions:

Wildflowers will not advertise its cultivation site, other than what is required by AMCO for the application process.

ag

If you are not applying for a retail marijuana store license, you do not need to complete the rest of Section 7, including Page 17.

Restriction on advertising of marijuana and marijuana products (3 AAC 306.360):

All licensed retail marijuana stores must meet minimum standards for signage and advertising.

Applicants should be able to answer "Agree" to all items below.

No advertisement for marijuana or marijuana product will contain any statement or illustration that:		Agree	Disagree
Is false or misleading	ag	X	
Promotes excessive consumption	ag	X	
Represents that the use of marijuana has curative or therapeutic effects	ag	X	
Depicts a person under the age of 21 consuming marijuana	ag	X	
Includes an object or character, including a toy, a cartoon character, or any other depiction designed to appeal to a child or other person under the age of 21, that promotes consumption of marijuana	ag	X	

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No advertisement for marijuana or marijuana product will be placed:	Agree	Disagree
Within one thousand feet of the perimeter of any child-centered facility, including a school, childcare facility, or other facility providing services to children, a playground or recreation center, a public park, a library, or a game arcade that is open to persons under the age of 21	●	○
On or in a public transit vehicle or public transit shelter	●	○
On or in a publicly owned or operated property	●	○
Within 1000 feet of a substance abuse or treatment facility	●	○
On a campus for post-secondary education	●	○

Signage and Promotional Materials:	Agree	Disagree
I understand and agree to follow the limitations for signs under 3 AAC 306.360(a)	●	○
The retail marijuana store will not use giveaway coupons as promotional materials, or conduct promotional activities such as games or competitions to encourage sale of marijuana or marijuana products	●	○
All advertising for marijuana or any marijuana product will contain the warnings required under 3 AAC 306.360(e)	●	○

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Form MJ-01: Marijuana Establishment Operating Plan

Section 8 – Control Plan for Persons Under the Age of 21

Describe how the marijuana establishment will prevent persons under the age of 21 from gaining access to any portion of the licensed premises and marijuana items:

Wildflowers will ensure that no person under the age of 21 years gains access to any portion of the licensed premises and marijuana items.
The perimeter is monitored 24 hours per day, seven days per week. Unauthorized persons including individuals under 21 years of age are not allowed on the premises.
Entrances to the building will have restricted access area signs that indicate it is unlawful for individuals under the age of 21 years and unauthorized persons to enter. All visitors will be required to show valid photo identification before being allowed into the facility. Valid identification as outlined by 3 AAC 306.350 to assess age include; an unexpired, unaltered passport, an unexpired, unaltered drivers license; instruction permit, or identification card of any state or territory of the United States, the District of Columbia or a province of Canada or an identification card issued by a federal or state agency authorized to issue a driver's license of identification card.

I declare under penalty of perjury that I have examined this form, including all accompanying schedules and statements, and to the best of my knowledge and belief find it to be true, correct, and complete.

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Form MJ-01: Marijuana Establishment Operating Plan

Section 8 – Control Plan for Persons Under the Age of 21

Describe how the marijuana establishment will prevent persons under the age of 21 from gaining access to any portion of the licensed premises and marijuana items:

Please see attached Operations, Inventory and Security Supplemental.

I declare under penalty of perjury that I have examined this form, including all accompanying schedules and statements, and to the best of my knowledge and belief find it to be true, correct, and complete.

Signature of licensee

Andrea Gribbin
Printed name

Subscribed and sworn to before me this 14 day of June, 20 16.

Sydney A. Castorina
Notary Public in and for the State of Alaska.

My commission expires: 01/26/20

STATE OF ALASKA
NOTARY PUBLIC
Sydney A. Castorina
My Commission Expires: January 26, 2020

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Attachement A page 1

INVENTORY CONTROL

This document shall serve as the Inventory Control Policies and Procedures for Wild Flowers LLC (hereinafter referred to as "Wildlowers"). Wildflowers will review its Inventory Control Policies and Procedures annually at a minimum and update them as necessary, to ensure ongoing and complete compliance with all applicable Alaska laws and regulations.

INTRODUCTION

The tracking and control of inventory is essential to all aspects of Wild Flowers venture. while preventing opportunities for diversion, we seek to provide a steady supply of high-quality marijuana to meet the medicinal and treatment needs of Wild Flowers Customers. The goal of inventory control is to create a wholly transparent process of production and distribution so that at any time the condition and quantity of every product, regardless of its production stage, is documented. This will allow us to maintain exceptional quality while avoiding over- or underproduction, and it allow us to prevent or promptly recognize any misallocation or theft. The primary goals of WildFlowers inventory control policies and procedures are:

To ensure product integrity;
Prevent internal or external product diversion;
Comply with all applicable state regulations, requirements and rules, and;
Track essential statistics related to Wild Flowers qualifying customer, product(s), and business operations.

There are (4) main components to Wildflowers's Inventory Control:

Well-trained, educated and service oriented staff;
State-of-the-art electronic inventory tracking;
Security; and
Rigorous operational protocols governing management, oversight, and accountability.

PERSONNEL – ROLES AND RESPONSIBILITIES

Inventory Control Agent

Wildflowers shall designate an Alaska State Licensed Marijuana Facility Agent as the Inventory Control Agent, to be responsible for inventory tracking and control. The Inventory Control Agent will have operational oversight over and responsibility for Wildflowers 's Inventory Control system. The Inventory Control Agent is responsible for ensuring the Inventory Control Policies and Procedures are properly implemented and complied with. The Inventory Control Agent will also be responsible for ensuring Wildflowers 's electronic tracking system is maintained and operated properly, ensure daily opening and closing inventories are performed as required, and ensure the manual inventory results coincide with the electronic records. The Inventory Control Agent shall also be responsible for performing a full audit of Wildflowers 's inventory and electronic and manual inventory records, no less than every thirty (30) calendar days, as well as anytime a discrepancy in the inventory records is detected.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed): **MJ-01 Attachement A page 2**

All strains and quantities that are available and approximately when additional strains and quantities will be available;
Timely alerts regarding the occurrence of low inventory on any particular strain;
Timely warnings regarding any possible overproduction;
All recalled and returned marijuana;
All marijuana designated for disposal, and;
All marijuana previously already disposed of;
Any plant that was produced at Wildflowers facility;
Any plant currently being cultivated;
Future projections regarding production and cultivation;
All product currently in transit and its destination;
Current inventory levels at Wildflowers Alaska State Licensed Marijuana Facility.
Accurate amount of medicinal marijuana sold and the applicable date of sale, and;
The strains and quantities presently in the possession of a Wildflowers facility;
To summarize: at any time we can generate an accurate snapshot of current (MMJ) marijuana production and holdings, including how many plants are being cultivated, the stage of each plant in the supply chain process, and the number and kind of products ready for sale. Real-time up-dates about the acquisition, sale, delivery, return, and disposal of inventory are entered into this system, providing comprehensive data management documenting every aspect of Wildflowers operation. This enables us to build routine inventory control and documentation into the production process itself, requiring verified inventory updates at each stage of the production process.

INFORMATION SECURITY

We will limit access to this network by using unique user passwords and by restricting IP addresses and MAC addresses to specific computers. The use of third party email, web, and data servers will be avoided. We will provide training on user procedures. Wildflowers inventory record keeping and software system will be managed by Wildflowers IT Director. All data and information will be secured and encrypted and backed up automatically every night, not only to a private server on site, but also to a secure, off-site server location, thus safeguarding Wildflowers data against disaster. For data backup we will be using a Mac Time-Capsule on site and encrypted FTP for transfer to secure off-site storage.

OPERATIONAL PROCEDURES

General Inventory Guidelines

Appropriate managers will be responsible for performing inventory, upon delivery, of all newly-purchased non-marijuana materials (growth supplies, Alaska State Licensed Marijuana Facility supplies, and raw materials). They will provide their written inventory results to Wildflowers accountants for reconciliation with purchase orders.

Inventory of marijuana will be precise, down to 1/100th of a gram for some purposes. We will use precision scales that are calibrated daily. All weights must fall within specific tolerance ranges to ensure there is no inventory shrinkage:

One gram must weight 1.03 grams +/- .02 grams
Each 1/8 oz. must weigh 3.55 grams +/- 0.2 grams
Each oz. must weigh 28.55 grams +/- 0.2 grams

The inventory tracking system creates an alert if weights fall outside of specified tolerance ranges.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed): **MJ-01 Attachement A page 3**

Other Staff

All staff involved in the handling of (MMJ) marijuana will be trained in the proper inventory control techniques that go with their jobs, and in the use of Wildflowers electronic tracking system. Because of the importance of inventory tracking to Wildflowers operations, we also anticipate that other management level positions will be involved in inventory tracking: the IT manager will be responsible for the security and functioning of the data management system and the security manager will be responsible for the initiation of security reviews when inventories do not tally.

Of Wild flow all aspects of the production process and sale of (MMJ) marijuana, including the inventory processes, occur under video surveillance, ensuring employee accountability even if there is a temporary disruption of the inventory tracking process described in this document.

A complete listing of Wildflowers 's employee positions and responsibilities, please refer to the Employee Descriptions and Responsibilities section of the Wildflowers , Wildflowers Employee Handbook.

INVENTORY CONTROL SYSTEM – CAPABILITIES

Wildflowers shall utilize a state-of-the-art inventory tracking system (the "Inventory Control System"). The Inventory Control System has flexible inventory capabilities perfectly suited to respond to the complex challenges we face in high-security inventory tracking. The following is a general overview of how Wildflowers Inventory Control System will operate.

Every (MMJ) marijuana plant in Wildflowers facility will be tagged with a unique (sequential) identification number. This number is visibly displayed and also encoded in an electronically readable format (a bar code). The inventory control tags will be created using thermal bar code printing technology.

All information and history pertaining to a plant is associated with this number and every package containing marijuana from this plant and every processed product made from this plant bears a similar, unique control number that incorporates or cross-references the number of the plant. This gives Wildflowers access to the complete manufacturing history of any item that is or ever has been in Wildflowers facility. This includes information, which is not limited to, but includes the following:

The strain, batch, tray number, and birth date of any plant;
The cloning mother, any cutting was taken from;
All related details of a plant's cultivation history (if, for example, there were any problems and how they were remedied);
The results of all of quality control tests performed;
Any individual plant's genetic history and medicinal variety, and;
The amount of dry yield that can be expected from any plant.
The amount actually harvested from any individual plant, and;
Why a plant was disposed of, as well as how and on what specific date.

When the marijuana is harvested, processed, and packaged, the assigned number travels with it, even as each individual product or package is flagged with its own unique identification number. Any plant, cutting, processed product, or container thus bears a control number that makes it possible to determine the complete manufacturing history of the associated item. Wildflowers inventory tracking software can use this information to provide at any time an accurate snapshot of current production conditions: how many plants are being cultivated and the stage of each plant in the supply chain process. This, in turn, enables us to predict and control production outcomes, avoiding overproduction, which leads to degradation and security risks, and underproduction, which leaves Customers with suboptimal care.

Real-time information regarding the processing, packaging, sale, return, and disposal of inventory is entered into the Inventory Control System, creating a comprehensive data management system that documents every aspect of Wildflowers operation that ensures accurate recording, documentation and access to the following information:

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marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
Phone: 907.269.0350

Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed): **MJ-01 Attachement A page 4**

Inventory of marijuana will cover seedlings, mature plants, packaged marijuana, food products, drying and curing marijuana, and items in quarantine or awaiting disposal. This ensures that all products, byproducts, and discarded items in Wildflowers operations are accounted for.

Any discrepancies between actual and recorded inventory will trigger an audit of inventory holdings and inventory records by the Inventory Control Agent sufficient to identify the problem. Confirmed inventory shrinkage will trigger a review of security and surveillance data and the implementation of appropriate corrective measures. Law enforcement authorities will be notified immediately if the Inventory Control Agent ascertains that there has indeed been loss, theft, improper diversion, or any other criminal activity as defined by Alaska Statute.
The records of all inventories will show:

Time and date of the inventory;
The inventory results;
Names and registry / Alaska License numbers of the employees performing the inventory, and their individual signatures.

The electronic record will be maintained in Wildflowers database for at least five years. A hard-copy printout of the inventory results will be signed by the employee(s) who have performed the inventory and kept on file (as a paper hard-copy or in scanned facsimile) also for at least five years.

Tracking and Recordkeeping of Daily Operations

Daily operations are defined by critical transitions: opening for business, harvesting or packaging plants, acquiring, selling, delivering, or disposing of inventory, closing for the day, etc. The inventory tracking system will be designed to enable us to document inventory status/flow for each critical transition event:

beginning inventory
acquisition
harvest
sales
disbursement,
deliveries
returns
disposals, and
closing inventory

At each step, those involved in handling the inventory must identify themselves to the system with a secure authentication procedure (e.g., a unique employee password or electronically-readable ID). The type of transition event will be indicated and the inventory is identified by electronic reading of its tracking number. The system automatically aggregates inventory by the types of transitions through which it passes (all sales, all deliveries, etc.) and by time of day (e.g., the disposition of any and every product at 3:00pm: being harvested, in transit, sold, etc.). Where applicable (e.g., whenever loose inventory is being handled), authorized personnel will determine the weight of the product, entering it into the system. In this way the flow of inventory through Wildflowers facility is fully documented in real time.

We anticipate that all of Wildflowers data eventually will be generated by electronic reading, including weight. This will be done with software that interfaces with digital scales. Furthermore, we aim to make Wildflowers tracking system self-monitoring so that discrepant, invalid, or missing data would generate an automatic alert.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Attachement A page 5

Opening and Closing Inventories

A comprehensive inventory of all (MMJ) marijuana, whether it is still growing or already prepared, will be done twice daily: before commencement and after close of daily operations. All marijuana and items containing marijuana are counted, weighed, or both.

These inventory results will be submitted to the Inventory Control Agent for reconciliation with the inventory data generated the previous evening or in the operations of the day after being closed out. Any discrepancies will trigger an inventory audit by the Inventory Control Agent and, if confirmed, a review of electronic security and surveillance data. Law enforcement authorities will be notified immediately if the Inventory Control Agent ascertains that there has indeed been loss, theft, improper diversion, or any other criminal activity (as per applicable state law).

Mandated Monthly Inventories

At intervals not exceeding 30 days, the Inventory Control Agent will conduct and document an audit of the inventory that is accounted for according to generally accepted accounting principles. Any unexplained shrinkage will be documented and trigger a review of electronic security and surveillance data. Wildflowers determines where the shrinkage occurred, appropriate corrective measures will be implemented. Law enforcement authorities will be notified immediately if the Inventory Control Agent ascertains that there has indeed been loss, theft, improper diversion, or any other criminal activity under Alaska State Law.

External Acquisition of MJ) Marijuana

To begin start up and as needed thereafter, we may acquire marijuana from another licensed Alaska State Licensed Marijuana Facility or other licensed State Licensed Marijuana Cultivation Facility's cultivation site, or as authorized by the applicable Alaska State regulatory agency to cultivate marijuana and to provide it to other authorized participants in the Marijuana Program.

Acquiring from Another Cultivation Site

When acquiring marijuana from another Alaska Alaska State Licensed Marijuana Facility , we will require the other Alaska State Licensed Marijuana Facility to disclose all tracking information about it: strain, batch number, birth date, harvest date (where applicable), cultivation history, list of all chemical agents or additives used on it, quality control data, and any other relevant information. We will not accept marijuana if the Alaska State Licensed Marijuana Facility cannot document that the marijuana meets Wildflowers own standards of quality.

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(Additional Space as Needed): **MJ-01 Attachement A page 6**

When we assign the receivec ,.. MJ) marijuana Wildflowers own control numbers, these numbers will cross-reference the Wildflowers Alaska State Licensed Marijuana Facility's unique registry and Alaska License number to be permanently linked to all the information we obtained about the marijuana from the Wildflowers Alaska State Licensed Marijuana Facility, along with other legally required information. The record then includes:

The amount acquired, its strain, and any other descriptive information;
Original batch and tracking number;
Name and registry / Alaska License number of the Alaska State Licensed Marijuana Facility and Alaska State Licensed Marijuana Facility agent providing the ,..MJ) marijuana;
Name and registry / Alaska License number of the Alaska State Licensed Marijuana Facility agent receiving th , IMJ) marijuana on behalf of Wildflowers Alaska State Licensed Marijuana Facility , and;
Date of acquisition.

Acquiring from another State Licensed authorized Wildflowers

We will record the following information and associate it with the inventory control numbers we assign to it upon receipt:

Amount acquired, its strain, and any other relevant descriptive information,
Name and registry / Alaska License number of the provider,
Name and registry / Alaska License number of the receiving agent, and
Date of acquisition.

Before integrating the acquired marijuana into Wildflowers inventory for cultivation or sale, we will perform laboratory analyses to verify the strain, quality, and cannabinoid profile. If it is not found to meet Wildflowers quality standards, it will be destroyed.

Packaging and Labeling

Packaging with Interim Labeling

Marijuana and trimmings are placed in tamper-evident containers, each with its own unique control number that incorporates or cross-references the control number(s) of the marijuana. The Inventory Control Agent reweighs the marijuana to verify the weight. The verified weight is entered into the inventory tracking database and the containers are labeled with the:

Control numbers
Strain
Weight
Harvest date

Packaged marijuana is then placed in storage safes awaiting further processing or sale.

Labeling for External Dispensing

Before marijuana that is intended for external distribution can be dispensed, labeling will be updated to include specific information about the transaction, as required by the applicable state regulatory agency:

When the Alaska State Licensed Marijuana Facility provides marijuana to a qualifying customer(s) the label records;

Alaska State Licensed Marijuana Facility's registry / Alaska License number;
Amount, strain, control and batch number of (MMJ) marijuana, and;
The following statement in compliance with applicable state law:

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Whether the marijuana was cultivated by Wildflowers Alaska State Licensed Marijuana Facility , and if not cultivated by the Wildflowers Alaska State Licensed Marijuana Facility , whether the marijuana was obtained from another Alaska State Licensed Marijuana Facility , or other marijuana facilities authorized under state law;
Date of manufacture or harvest, and date of sale;
Complete listing of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation and production of the ' MJ) marijuana, and;
Registry / Alaska License number of the qualifying customer , or drivers' license of the customer or other required identification in compliance with state law.

When Wildflowers Alaska State Licensed Marijuana Facility provides marijuana cultivated by the Alaska State Licensed Marijuana Facility to another Alaska State Licensed Marijuana Facility , the label records: Alaska State Licensed Marijuana Facility 's registry / Alaska License number, Amount, strain, control and batch number of the marijuana,
Date of manufacture or harvest, date of sale, and Complete listing of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation of the ,.. MJ) marijuana. When the marijuana is provided as part of an edible food product, the label records the total weight of the edible food product, in addition to the information indicated above for labeling when marijuana is dispensed to a qualifying customer.

Dispensing to Customers or Other State Licensed Facilities

Providing Marijuana to Customers - Before marijuana is dispensed to a customer, or other Alaska State Licensed Marijuana Facility Wildflowers agent requires proper identification to determine marijuana Alaska State Licensed Marijuana Facility is valid;
Each person presenting a registry / Alaska License card is the person identified on the registry / Alaska License card presented to the nonprofit MJ) marijuana Alaska State Licensed Marijuana Facility agent, and;
Amount to be dispensed.

After making these required determinations, but before dispensing marijuana to a customer a licensed Wildflowers Agent will enter the following information into the verification system:

How much marijuana is being dispensed to the customer or registered qualifying customer ;
Whether it was dispensed directly to the customer or registered qualifying customer.
Date and time the marijuana was dispensed, and;Registry / Alaska License card number, if applicable, of the Alaska State Licensed Marijuana Facility and of the marijuana Alaska State Licensed Marijuana Facility agent who dispensed the marijuana.

The Alaska State Licensed Marijuana Facility agent will enter the same information into Wildflowers own inventory tracking database along with the control numbers of the products purchased.

Providing ,...MJ) Marijuana to Other Alaska State Licensed Marijuana Facility

If the Alaska State Licensed Marijuana Facility provides marijuana to another Alaska State Licensed Marijuana Facility , it will record in the inventory tracking database:

Amount, strain, and batch number of the marijuana provided;
Name and registry / Alaska License number of the Alaska State Licensed Marijuana Facility agent providing the marijuana to the other Alaska State Licensed Marijuana Facility ;
Name and registry / Alaska License number of the other Alaska State Licensed Marijuana Facility ;
Name and registry / Alaska License number of the Alaska State Licensed Marijuana Facility agent receiving the marijuana on behalf of the other Alaska State Licensed Marijuana Facility , and;
Date on which it was provided.

Return and Recall

Marijuana may be returned to Wildflowers facility for several reasons, the following are examples of such instances:

The marijuana is no longer needed by the patient or the patient's registration has expired or been revoked;
The marijuana is found to be defective by the patient, or;The marijuana has been recalled by the Alaska State Licensed Marijuana Facility due to quality concerns with the associated batch.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed): **MJ-01 Attachement A page 8**

Procedures for Destroying Marijuana. Wildflowers will work with local law enforcement to develop policies and procedures for the lawful destruction of marijuana, however, Wildflowers utilizes every part of the active marijuana plant leaving no waste In the event of waste, Wildflowers shall donate unusable marijuana over to local law enforcement for destruction. We would arrange for them to take possession of it on certain specially or regularly arranged days.

Wildflowers third choice is to process defective , MJ) marijuana and plant by-products in-house by degrading then into a wholly unusable form in conformance with applicable state law, such as grinding and soiling marijuana waste with non-consumable solid wastes. In this form, marijuana waste can be disposed of at a City and State approved waste facility.

Whenever marijuana is turned over to the police for destruction, an inventory record is generated indicating:

The control numbers associated with the marijuana turned over for destruction;
Reason it was turned over for destruction;
Names and signatures of the law enforcement officials receiving the marijuana;
Amount turned over, and;
Date and time it was turned over.

The Inventory Control Agent must be present for the inventory transfer and must, along with at least one other employee acting as witness, sign a printed record of inventory transfer, which will be kept as a hard copy or electronically as a scanned facsimile for not less than five years.

Whenever marijuana is destroyed on site an inventory record is generated indicating:

The control numbers associated with the marijuana destroyed;
Reason it was destroyed;
Manner in which it was destroyed;
Amount destroyed;
Date and time it was destroyed, and;
Those individuals present during the destruction.

The Inventory Control Agent must be present for all on-site destruction and must, along with at least one other employee acting as witness, sign a printed record of disposal, which will be kept as a hard copy or electronically as a scanned facsimile for not less than five years.

Wildflowers records

Wildflowers will ensure its records, policies and procedures as well all components of its Inventory Control System will be available to applicable state regulatory agencies, upon written notice to review any such information and documentation. In addition, Wildflowers will ensure all such information is available for on-sight review by the applicable state regulatory agency, again upon receipt of written notice.

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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Attachement A page 9

Product Returned as Unsatisfactory. Wildflowers believes that a customer-friendly return policy is essential to all aspects of Wildflowers operation. We would like to be made aware as soon as possible of any product safety issues that have escaped Wildflowers screening process so that we can promptly analyze and correct the problem.

Any products returned for quality reasons are weighed and sent for inspection and analysis. If evidence of pests, contamination, or other defects is found, the inventory tracking system will identify all products derived from the same plant or batch (regardless whether they are still in Wildflowers Alaska State Licensed Marijuana Facility or have been dispensed to qualified customers or other Alaska State Licensed Marijuana Facility), allowing us to do wider testing and remediate, protect, or dispose of inventory as needed and recall products when necessary.

Customers will be informed of Wildflowers return policies and rules both verbally and in writing. We will make sure Customers understand that

To return products, they must first make, in advance, an appointment specifically for this purpose;
Marijuana damaged by improper storage by the patient may be returned, but shall not be replaced;
Marijuana must have in fact been purchased at Wildflowers facility and have been the most recent purchase made by the customer;
Most importantly, we strictly enforce a fraudulent return policy by informing customers that attempting to return marijuana that was not in fact purchased at Wildflowers Alaska Alaska State Licensed Marijuana Facility will result in a denial of further purchasing privileges at Wildflowers Alaska State Licensed Marijuana Facility .

Recalled Marijuana. We will work to develop a responsible policy on compensating Customers for recalled products.

Disposal and Destruction

Although Wildflowers has no active Marijuana Waste, If Wildflowers did have waste, Marijuana may be destroyed under the following circumstances:

Marijuana is unused, as when a variety is produced,in a quantity that exceeds actual patient demand, and it is also not wanted by other Alaska State Licensed Marijuana Facility ;
Marijuana is found by internal quality control assessments to be infected or contaminated or fails to meet other quality control standards;
Marijuana is recalled due to batch-related quality control concerns;
Marijuana is returned by a customer because it was found to be defective;
Marijuana is no longer needed by the qualifying registered patient;or
Wildflowers 's Alaska State Licensed Marijuana Facility expires without being renewed or is revoked.

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(Additional Space as Needed):

Attachment A
MJ-01 Page 10

Unescorted Members of the Public in Restricted Access Areas: Pursuant to 3AAC 306.710(c)(2) individuals visiting the facility obtain a visitor identification badge before entering the restricted access area will be assigned to a designated authorized employee responsible for escorting the visitor in and out of restricted access areas.

All individuals visiting will be required to provide a valid photo identification as outlined by 3 AAC 306.350 issued by a federal or state agency authorized to issue a driver's license or identification card. Visitors to the premises will be supervised by an authorized employee No more than five (5) visitors will be allowed per each employee at a time (3 AAC 306.710 (b). All visitors will be required to sign non-disclosure agreements, visitor agreement and will be stored in the visitor record with the following information per 3 AAC 306.755(6); name, date, time in and out, copy of identification and signature of supervising employee.

Access security cards will be issued to law enforcement personnel including an agent of the board allowing for limited access to restricted areas as needed for specific authorized purposes and will be escorted at all times by an authorized employee. Individuals attempting to enter a restricted access area without permission or supervision will be asked to leave the premises immediately to avoid law enforcement involvement.
Video surveillance equipment, security alarm features such as security door contacts and locks on entrance and exits to the property that will trip the alarm if the door contact is activated, and interior & exterior video surveillance will be used to monitor and determine if an individual has attempted to access a restricted access area unescorted and will be used to support overall monitoring of individuals access to restricted access areas.

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Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Attachement A page 11

CONCLUSION

We have described the critical components of Wildflowers Inventory Control System. We have identified the staffing positions involved in the oversight and execution of all aspects of inventory control and the key elements in the quality control of Wildflowers training, oversight, and accountability. We have detailed the technical capabilities and security safeguards of Wildflowers electronic tracking and data management systems. For any job responsibility the performance of which involves handling marijuana, we have described how inventory tracking procedures are integrated into its execution. Wildflowers operational procedures are therefore fully transparent and accountable. The reliability of this system of built-in controls is checked twice daily by comprehensive inventories, and all of these production operations and control procedures occur under secure video surveillance.

However, we have not yet said anything about the most important oversight of all, which is the oversight of the State of Alaska over Wildflowers business operations. Wildflowers understands that we are responsible for facilitating this oversight by documenting or being able to document on demand proof that we are in full compliance with the laws of the applicable State, as well as all rules and regulations of the applicable Agencies.

We believe the Inventory Control Policies and Procedures described here meets or exceeds the legal and regulatory requirements of the State and all relevant Agencies, including the reporting requirements. The system of operational procedures we have described generates real-time records of all production activities. These records are immediately cached in Wildflowers secure databases. Their reliability is verified by a comprehensive inventory performed twice daily. The results of these inventories are added to Wildflowers secure data cache and reconciled with the operationally-generated data. Audits and security reviews are also documented in the system. This database is comprehensive. It will be fully auditable and searchable. Data will be preserved for five years and made available to State authorities at any time.

All Wildflowers and Wildflowers Inventory Control Policies and Procedures shall be updated to fully comply with Alaska State Law defined by State, local and Municipal jurisdictions as defined by Alaska's Marijuana Statute.

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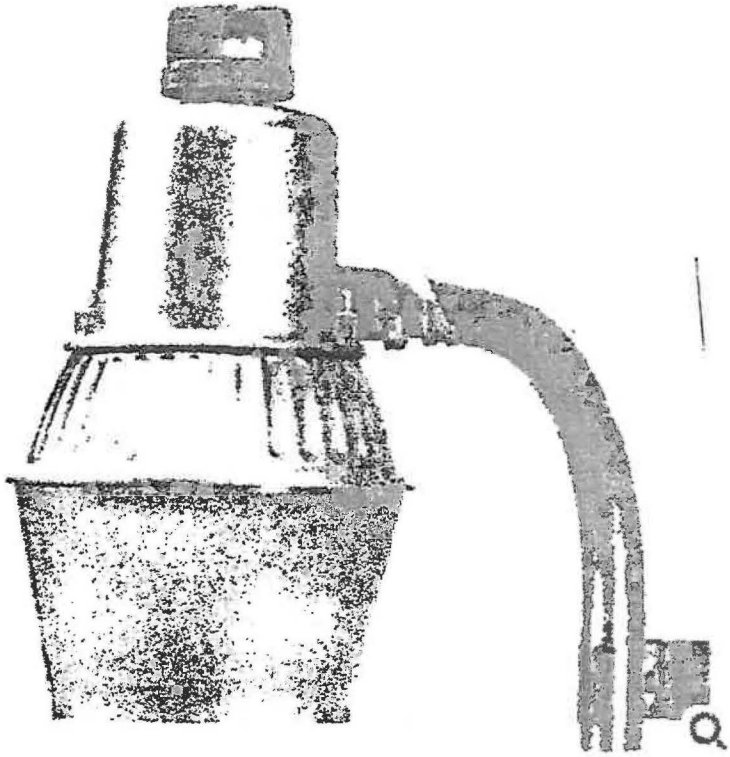
Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed):

MJ-01 Exhibit B

Exterior Lighting Example



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Form MJ-01: Marijuana Establishment Operating Plan

(Additional Space as Needed): MJ-01 Exhibit D

The Cultivation Facility will transport marijuana products in accordance with the Alaska Administrative Code at section 3 AAC 306.750(a)(1), shipping throughout the State of Alaska to (1) marijuana cultivation facilities; (2) marijuana product manufacturing facilities; (3) marijuana testing facilities; and (4) marijuana retail stores.

When transferring medicated inventory (or product) to a testing, product manufacturing or retail facility based on purchase orders from licensed marijuana establishments the electronic inventory tracking system labels will allow the packaged items to be transferred legally with a transport manifest.

Product will be placed within a sealed and tamper-evident shipping container, affixed with a proper label on the shipping container and with a valid transport manifest attached at all times (3 AAC306.435).

Metrc - Verification, Tracking, and Control.
Prior to finalizing any transaction for the sale of marijuana, or transporting product for testing, Management will take such necessary steps to verify that the establishment receiving the shipment has a valid and current license in Metrc", the marijuana inventory tracking and control system.

If the receiving facility is found to have an invalid, lost, revoked, or expired license, it will be informed that the Cultivation Facility cannot process the sale and/or shipment.