THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

September 2, 2017

AKO Farms, LLC
DBA: AKO Farms, LLC
Via email: rgrjrb@hotmail.com

Re: Standard Marijuana Cultivation Facility #12253

Dear applicant,

The AMCO Office is reviewing the documents submitted for the proposed marijuana establishment license referenced above. The following items need to be corrected and/or resubmitted.

- **MJ-01 Operating Plan**
  - Page 1, first box: please elaborate further on you answer in this box. For example, instead of "All restricted areas will be marked as such". Tell us what the sign to all entrances to a restricted access area is going to say. Re-review 3 AAC 306.710, there is a very specific wording for a restricted access areas sign.
  - Page 1, second box: Re-review 3 AAC 306.710 and describe how your establishment will meet the 1 to 5 employee/visitor ratio in a restricted access area.
  - Page 3, second box: the sample identification as requested was not provided. Please provide a copy of a sample identification badge to be displayed by each licensee, employee, or agent while on the premises that will be issued by the establishment.
  - Page 5, first box:
    - This is cultivation application, your establishment should not have marijuana products in its inventory, remove that term.
    - Please elaborate further and describe how you will prevent diversion by employees.
    - If the board were to ask you, what else besides the answer in your box are you going to do to prevent diversion, what would your answer be?
  - Page 5, second box: the answer to this box seems to be cut off. Please complete.
  - Page 12, first box:
    - What do you mean by "any samples that we are given"? please clarify.
    - Please include in your answer that you must notify enforcement of your waste, via email, three days before rendering the marijuana unusable and disposing of it.
    - Your answer does not address liquid waste.
    - What else would you tell the board about how you are going to manage your solid and liquid marijuana waste? Where is the waste holding area?
  - Page 15, first box: re-review 3 AAC 306.750, 3 AAC 306.470, and 3 AAC 306.475 and elaborate further on your answer to this box. For example, packaging requirements

depend upon whether you are selling to a retail marijuana store for direct consumer sell or for retail repackaging. Talk about the required labeling. You don't mention anything about the required manifest.
  - Page 16: your sign will be in the front of the building. Does that mean it will be attached to the front of it?
  - Page 18: this page needs to be signed in front of a notary.

- **MJ-02 Premises Diagram**
  - The diagrams submitted are not very clear.
  - Please provide and aerial view diagram that clearly shows the proposed premises and what surrounds it. Please label it clearly.
  - The diagrams that show the layout need lots of work:
    - Show the licensed premises of the cultivation (use one color and label)
    - Show the restricted access areas within the license premises (use a different color and label)
    - Show the reception area you mention in your operating plan
    - Show surveillance room
    - Show camera placements
    - Show the dimension of the rooms and the rooms as you describe them on MJ-04 page 2. The diagram(s) and page 2 of MJ-04 must be congruent.
    - Clearly label entrance(s) and exit(s)

- **MJ-04 Cultivation Supplemental**
  - Page 5: please elaborate further on 3 AAC 306.455(c) in this box. Also, describe how your establishment will comply with 3 AAC 306.465.
  - Page 6: Do you have a sample label that you will be using to comply with 3 AAC 306.470 and 3 AAC 306.475?

- **Proof of Possession for Proposed Premises**
  - The document you submitted as proof of possession of the premises is inadequate. Who owns the property? We need proof that AKO Farms, LLC has the right to the proposed premises whether that is a Warranty Deed or a legally binding lease. Either document must reflect the physical address of the proposed premises, not just the legal description. If a lease is executed the lease must include the following:
    - An acknowledgment from the landlord that the premises will be used for a marijuana establishment, and
    - A disclaimer that in case of default the landlord will not remove or take possession of marijuana and AMCO will be notified (this is usually under "Default" section of the lease).

- **Entity Documents**
  - Please provide the LLC's Operating Agreement.

If we do not receive your completions within 90 days, per 3 AAC 306.025(f), you must file a new application and pay a new fee.

Respectfully,

Jane Sawyer, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov