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

April 12, 2018

Worner Brothers Horticulture, LLC
DBA: Worner Brothers Horticulture
Via email: jworner@gmail.com

Re: Standard Marijuana Cultivation Facility #15403

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**.** Please be sure to read the entire letter.

- **MJ-01 Operating Plan**
  - Page 2, first box: according to 3 AAC 306.710 Restricted access areas, each entrance to a restricted access area must be marked by a sign that says "Restricted access area. Visitors must be escorted." Please correct accordingly.
  - Pages 4-5: according to 3 AAC 306.715(d), "a marijuana establishment shall use commercial grade, non-residential door locks on all exterior entry points to the licensed premises." Please accordingly incorporate in your answer.
  - Page 5, first box: please include in your answer your policies and procedures for preventing diversion of marijuana or marijuana product by employees.
  - Page 7, second box: please expand upon your answer and describe how you will ensure the area is accessible only to authorized personnel, law enforcement, or an agent of the board.
  - Page 9: please expand upon your answer and describe how you will prevent records and data, including electronically maintained records, from being lost or destroyed.
  - Page 11: other than making sure employees possess a marijuana handler permit, are you going to provide in-house training? Please add to your answer and explain in the box.
  - Page 12, first box: please re-review 3 AAC 306.740 and adjust your answers accordingly. For example, you are not describing how you will store and manage the waste during the three-day waiting period. Also, the marijuana waste must be ground to render it unusable, and the three-day notice to AMCO must be given before the marijuana waste is rendered unusable. Additionally, you do not mention your disposal process for the solid waste. Furthermore, the Board may have questions concerning the "etc…" in your answer; you may want to consider clarifying what the etc… means exactly.
  - Page 12, second box: I see that you mention the 50/50 ratio in the first box on page 12 and 13; however, please make sure to incorporate mixing the ground marijuana plant waste with at least an equal amount of other compostable or non-compostable materials (50/50 ratio) in this box.

- Page 13: please expand upon your answer. For example, the marijuana waste must be ground to render it unusable.
- Page 15, first box: please re-review 3 AAC 306.470 & 3 AAC 306.475 and expand upon your answer to this box describing how you will meet those regulations.
- Page 16: according to 3 AAC 306.710 Restricted access areas, each entrance to a restricted access area must be marked by a sign that says "Restricted access area. Visitors must be escorted." Please correct accordingly.

- **MJ-02 Premises Diagram**
  - Please provide a google-like, zoomed in, aerial view diagram/map of the building in which this cultivation premises will be. In that aerial view, you need to clearly show the building and what surrounds that building (what business, other buildings, streets, etc.), please label it.
  - The diagram you submitted of the proposed cultivation facility needs some work, please show the following (more questions may come up once we receive a new diagram from you):
    - What type of structure is the building (include it on the diagram)
    - Outline the entire perimeter of the proposed licensed premises and restricted access area (use separate colors and labels).
    - Clearly label the interior layout of the proposed licensed premises, including unlabeled spaces within the premises, and entrances and exits to and from the premises.
    - The tank room that you intend to have included as a restricted access area must be connected internally. In other words, the licensed premises and restricted access area must be contiguous. Or, you may want to consider excluding the tank room from the proposed licensed premises, only if no marijuana or a marijuana product is grown, processed, tested, stored or stocked in this area. Please correct accordingly.

- **MJ-04 Cultivation Supplemental**
  - Page 2: your answer in the box does not fully answer the question, you only provide the overall square footage. Please expand upon your answer in the box and describe the spaces that you will have under cultivation to include dimensions. Provide a detailed answer that is congruent with the diagram from MJ-02.
  - Page 3, second box: please describe the marijuana cultivation facility's delivery systems to be used.
  - Page 4, first box: please make sure that this box is congruent with pages 12-13 of MJ-01.
  - Page 5: please re-review 3 AAC 306.455 and expand upon your answer.
  - Page 6: please provide a sample of the label(s) (including logo(s) if you will have one) of how you will comply with the labeling and packaging under 3 AAC 306.470 & 3 AAC 306.475.

- **Proof of Possession for Proposed Premises**
  - Please accordingly incorporate in the lease the following:
    - An acknowledgment from the landlord/lessor that the premises will be used as a marijuana establishment, and

- A disclaimer that the landlord/lessor may not take possession or remove marijuana from the premises and AMCO Enforcement will be contacted (this is usually under the "Default" section).

- **Entity Documents**
  - Please submit the Operating Agreement for Worner Brothers Horticulture, LLC.

- **Applicant's Residency**
  - Please follow up on the status of your PFD with the Permanent Fund Dividend Division, and then update us with the resolution.

It is very important that you submit the above corrections and/or documents as soon as possible. AMCO staff needs adequate time to review the documents and determine if additional corrections and/or documents are necessary to complete your application. If you fail to complete this application within 90 days of the date of this notice, you must file a new application and pay a new fee, per 3 AAC 306.025(f).

Respectfully,

Jacqlene Drulis

Jacqlene Drulis, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov