MJ-15 and its attachments

Alcohol and Marijuana Control Office
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Anchorage, AK 99501
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https://www.commerce.alaska.gov/web/amco
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Alaska Marijuana Control Board

Form MJ-15: Operating Plan Change

What is this form?

This operating plan change form is required for all marijuana establishment licensees seeking to change a licensed marijuana establishment's existing operating plan, as required by 3 AAC 306.100. With this form, a licensee may request changes to as much or as little as desired of Form MJ-01 and/or the corresponding operating plan supplemental for the establishment's license type. **The required $250 change fee may be made by check, cashier's check, or money order.**

Please download, complete, and submit with this form **only the pages** of Form MJ-01 and/or the corresponding operating plan supplemental that contain sections that you are requesting to change. All fields that are left blank will be considered unchanged from the existing operating plan. All fields that are completed and submitted with this form will be considered as changes to the existing operating plan and are subject to board approval. **Please do not submit any wholly unchanged pages of an operating plan.**

The form(s) that I am requesting board approval to change is:

- [x] **Form MJ-01:** Marijuana Establishment Operating Plan
- [ ] **Form MJ-03:** Retail Marijuana Store Operating Plan Supplemental
- [ ] **Form MJ-04:** Marijuana Cultivation Facility Operating Plan Supplemental
- [x] **Form MJ-05:** Marijuana Product Manufacturing Facility Operating Plan Supplemental
- [ ] **Form MJ-06:** Marijuana Testing Facility Operating Plan Supplemental

This form must be completed and submitted to AMCO's main office prior to changing existing operations. The licensed establishment's operations may not be altered unless and until the director has given temporary approval or the Marijuana Control Board (MCB) has given final approval of the changes. Please note that licensees seeking to change operating plans for multiple licenses must submit a separate completed copy of this form for each license.

Section 1 – Establishment Information

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

Licensee:	Axion Enterprises, LLC	**MJ License #:**		12769	
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	Secret Garden Cannabis				
Premises Address:	726 E 15th Ave Suite 2				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Alaska Marijuana Control Board

Form MJ-15: Operating Plan Change

Section 2 – Summary of Changes

Provide a summary of the changes for which you are requesting approval.

Converted to New Forms per AMCO Request. Where applicable, sections from old forms combined and duplication removed. Content changed only as noted below.

MJ-01
Section 1 - • Updated mailing and e-mail addresses.
Section 2.1 - • Changed the statement, "All entrants will be directed to enter through the front entrance door where they will check in with a designated agent" to "All visitors will be directed to the employee entrance where they will be meet by a designated agent". • Replaced 'door leading into Cultivation area' with 'door leading into Manufacturing area'
Section 3.1 - • Removed 'all windows' from the list of areas covered by 24 hour security camera monitoring. The product manufacturing area has no windows. • Changed 'office and safe room' in the list of areas covered by 24 hour security camera monitoring to 'Security Room'. • Removed information on admitting visitors as it is specifically addressed under the next question. • Defined door with spring-loaded hinges and doors with restricted areas signs as exterior doors, instead of all doors.
Section 3.2 - • Changed 'other individuals' to 'visitors'. • Removed that visitors will enter through Retail. Replaced with visitors will be directed to the Employee Entrance, where they will be met by an employee and allowed into the Lobby for Visitor Check-In. • Removed statement that Security will retain photo identification. • Removed statement that the company will retain a photocopy of all visitor IDs to be stored with the log as official business records. • Changed that business records will be kept in the Security Room located in Cultivation, instead of in the secured office.
Section 3.3 - • Added visitor badge example.
Section 3.4 - • Removed that LED lights will be posted along the outer perimeter of the property. • Removed specific number of exterior lights to be affixed to the building.
Section 3.5 - • Removed statement that a third party security company would test the devices every six months. • Added that the security system is self-diagnosing and will alert the management if there is a malfunction. And that the security system will be tested by management on a regular basis. • Updated that the third party security company will continuously monitor the facility when the system is armed. Previously stated that third party security would continuously monitor. • Added entry sensors as components of the alarm system. • Removed that panic buttons will be worn on a lanyard and replaced with panic buttons will be utilized. • Removed previous statement that the building would be evacuated and all visitors would be escorted immediately to the nearest exit. Updated to state that employees and visitors report to the primary safe area (Lobby) and management will determine if evacuation of the building to the secondary safe area is necessary. Additionally, added that visitors and employees will be accounted for while waiting for local emergency officials to respond and that any required notifications to AMCO will be made as soon as possible.
Section 3.6 - • Changed location of security monitors and video recording equipment to be the Security Room, instead of the offices. • Added that security monitors and video recordings will be available to SGC Management remotely.
Section 3.13 - • Clarified that cameras mounted on the exterior of the building will record activity at all exterior access doors. • Removed statement that the parking lot will have video coverage to identify vehicles. • Updated that the failure notification system will provide e-mail and/or text notification of any failure in the surveillance system. Instead of audible and visual notification. • Changed that during a power outage all cameras and recording equipment will be run on battery backup for at least 30 minutes. Previously stated one hour.
Section 3.14 - • Updated that all surveillance recording equipment, footage and backups will be stored in the Security Room located in the Cultivation Facility, instead of in the shared office. • Added that the licensee will ensure that all security requirements of 3 AAC 306.720(d) are met. The licensee will have 40 days of back up storage of surveillance records at the licensed premises and copies of required business records at the licensed premises as well.
Section 4.2 - • Updated all references to business records storage to being in the Security Room located in the Cultivation Facility, instead of in the shared office. • Removed all references to business records being backed up to an off-site location. All business records including back-ups, will be stored Security Room.
Section 8.1 - • Changed description of secure storage compartment to read, 'Vehicles that will be used for transportation of marijuana will contain, or have affixed or mounted, a secure and sanitary lock box, that is either enclosed by the vehicle or affixed to the bed of the vehicle or trunk of the vehicle that will lock and will ensure the products cannot be seen by anyone from outside of the transportation vehicle.' Previously read, 'Vehicles that will be used for transportation of marijuana will contain a secure and sanitary area affixed to the inside of the transportation vehicle that will lock and will ensure the products cannot be seen by anyone from outside of the transportation vehicle.'
Section 9.1 - • Removed 'Manufacturing' from the description of the business name to be included on the sign. Previously read 'Secret Garden Cannabis – Manufacturing'. • Changed previously 'affixed to the backside of the building', to 'affixed to the building or free standing if the current regulation and muni codes are modified to allow such'.
Section 9.2 - • New Section

MJ-05
Section 2.1 - • New Section
Section 3.1 - • Removed the word 'supercritical' from the CO2 botanical oil extractor. • Added Crock pot and ice water extraction bags as a type of equipment. Added winterization equipment including buchner funnels, filter papers, vacuum pumps, rotary evaporator, hot plates, stir pads and distillation glassware. Added distillation assembly equipment, including chillers, flasks, funnels, heating elements, borosilicate glassware, quartz glassware and various control electronics.
Section 4.2 - • Corrected sentence that previously read, "Secret Garden Cannabis will ensure that all marijuana product is rendered unusable prior to leaving the facility", by adding the word 'waste'. • Removed that the unusable, marijuana product waste will be securely stored in locked containers located on the premises. Replaced with 'Once rendered unusable, marijuana product waste will be placed in the facility dumpster'. • Updated that all locks will be commercial grade and UL listed. • Removed statement that the on-site manager will meet with the waste truck driver and collect a signature and name, the date, time and type of marijuana waste being collected. Also removed that the above information will be recorded and stored as a business recorded.
Section 5.4 - • New Section

Section 3 – Declarations

Read each statement below, and then sign your initials in the corresponding box to the right: Initials

The proposed changes conform to all applicable public health, fire, and safety laws. JT

I understand that any temporary approval granted by the director is pending a final decision by the MCB; therefore, any investment I make, based upon temporary approval, is at my own risk. JT

As a marijuana establishment licensee, I declare under penalty of unsworn falsification that this form, including all accompanying schedules and statements, is true, correct, and complete.

Signature of licensee

James M.P. Thornton

Printed name of licensee

Notary Public in and for the State of Alaska.

My commission expires: 08/28/21

Subscribed and sworn to before me this 16 day of August, 2018.

"Official Seal"
Notary Public
Breanne Martucci
State of Alaska
Commission # 170828008 Exp 08/28/2021

AMCO Director Review for Temporary Approval Pending Final MCB Decision: Approved ☐ Disapproved ☐

Printed name of Director

Date

Signature of Director

Director Comments:

12769 MJ-15 Section 2 Text

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MJ-01

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Received by AMCO 9.18.18

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Section 3.13 - • Clarified that cameras mounted on the exterior of the building will record activity at all exterior access doors. • Removed statement that the parking lot will have video coverage to identify vehicles. • Updated that the failure notification system will provide e-mail and/or text notification of any failure in the surveillance system. Instead of audible and visual notification. • Changed that during a power outage all cameras and recording equipment will be run on battery backup for at least 30 minutes. Previously stated one hour.

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Alaska Marijuana Control Board

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:

- Control plan for persons under the age of 21
- Security
- Business records
- Inventory tracking of all marijuana and marijuana product on the premises
- Employee qualification and training
- Health and safety standards
- Transportation and delivery of marijuana and marijuana products
- Signage and advertising

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 & Contact Information

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

Licensee:	Axion Enterprises, LLC	**MJ License #:**	12769		
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	Secret Garden Cannabis				
Premises Address:	726 E. 15th AVE Suite 2				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Mailing Address:	PO Box 200011				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99520

Designated Licensee:	James M.P. Thornton		
Main Phone:	907-952-7070	**Cell Phone:**	907-952-7070
Email:	james@secretgardenak.com		

Section 2 – Control Plan for Persons Under the Age of 21

2.1. 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:

At no time will a person under the age of twenty one (21) be permitted to remain on the premises. All visitors will be directed to the employee entrance where they will be meet by a designated agent. A sign will be posted on both the front entrance door and on the door leading into the manufacturing area stating "No one under 21 years of age allowed". At check in, visitors will be required to present valid government-issued photo identification showing that they are twenty one (21) years of age or older. A valid form will include: (1) an unexpired, unaltered passport; (2) an unexpired, unaltered driver's license; instruction permit, or identification card of any state or territory of the United States, the District of Columbia, or a province of Canada; and (3) an identification card issued by a federal or state agency authorized to issue a driver's license or identification card. The facility will refuse entrance to all persons who fail to produce valid photo identification, regardless of how old they appear or how familiar they are with the employee. If at any time an employee suspects that a visitor is under twenty one (21), the employee will refuse access and have the individual escorted off the premises. Employees will be trained to spot inconsistencies and signs of forgery in IDs, and will have an ID guide on hand to help recognize IDs from other states and countries.

Section 3 – Security

Restricted Access Areas (3 AAC 306.710):

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

The entire facility will be designated as a restricted access area and will be equipped with a robust security system. The premises will be equipped with outdoor lighting, 24 hour video surveillance, an alarm system that will provide electronic notification to owners and law enforcement if necessary, and multiple signs stating that the premises is secured and monitored. Posted signs will also state that visitors must be escorted. The interior of the facility will have security cameras installed for 24 hour monitoring of all entrances and exits, the check in area, all security doors, restricted access areas and Security Room. The exterior of the building will have 24 hour surveillance cameras recording all activity on the premises. All restricted access areas within the facility will be monitored at all times and separated from public areas by locked doors. The exterior doors will be equipped with spring-loaded hinges to ensure that they close behind each person. Access to restricted areas will be granted through a smart lock system, and signs will be posted on each exterior door stating that the door leads into a restricted area and members of the public must be escorted. Cameras will also be placed conspicuously at each door to deter visitors from attempting access alone.

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

The owner, manager on duty, specially-defined agents, and any emergency personnel during the time of an emergency will have unrestricted access to the entire facility. All visitors who are permitted access to restricted areas must be accompanied by an escort at all times. Visitors will be directed to the Employee Entrance, where they will be met by an employee and allowed into the Lobby for Visitor Check-In. Valid government-issued photo identification will be required. The visitor will sign into a log with their name, the date, time in and out of the restricted space and purpose of their visit. All visitors will be given a visitor badge to be displayed on their person at all times and returned upon exit. Visitors will be escorted and actively supervised by an employee at a 5:1 ratio while in the facility, and once the visit has concluded, the visitor must leave the premises immediately. Any unusual activity or behavior observed during the visit will be recorded on the visitor log. The log will be kept and stored as a business record and will be made available to the MCB upon request. Business records will be kept in Product Manufacturing ~~Security Room located in Cultivation~~ and only the licensee and authorized employees will have access.

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3.3. Provide samples of licensee-produced identification badges that will be displayed by each licensee, employee, or agent while on the premises, and of visitor identification badges that will be worn by all visitors while in restricted access areas:

Or similar format and content

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

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

Exterior lighting will be positioned against the building and perimeter, and evenly distributed throughout the property. The facility plans to install commercial LED lights to be affixed to the building and evenly distributed on the property. The light fixtures will keep the premises, signs, doors, and windows well lit, and allow the exterior surveillance cameras to record individuals up to twenty (20) feet from all entry points to the building (there are no exterior entry points to the manufacturing facility). The lighting fixtures will be positioned at an inaccessible height with sturdy housings to deter vandalism and common obstructions. The bulbs will be extremely bright to maximize visibility and deter crime. The exterior lighting will be checked weekly by the manager on duty to ensure that each light in the system is operational, and that each mount is positioned for optimum recording clarity and to deter unauthorized presence on the premises.

3.5. An alarm system is required for all license types that must be activated on all exterior doors and windows when the licensed premises is closed for business. Describe the security alarm system for the proposed premises, explain how it will meet all regulatory requirements, and outline your policies and procedures regarding the actions to be taken by a licensee, employee, or agent when the alarm system alerts of an unauthorized breach:

A third party security company will install the alarm system, maintain the equipment and continuously monitor the facility when the system is armed at an off-site center to ensure the safety of the property and to detect unauthorized activity. The alarm system will be active at all times that the facility is closed. Sensors will be installed and maintained on all potential entry points of the building, including all doors and windows, to monitor for motion, intrusion, or activity when the alarm system is activated (the manufacturing facility has no exterior doors or windows). The alarm system will be set up to monitor for intrusions with motion detectors and entry sensors throughout the facility, during closed hours. When triggered, an electronic alert will be automatically sent to the security company who will then contact local law enforcement and ownership. Panic buttons will be utilized for employees to access in case of emergency. When pressed, the buttons will trigger the alarm system, 24 hours a day. Employees will be trained to know how and when to use the panic buttons prior to beginning work, and all owners and managers will be educated on proper use, troubleshooting, and control of the alarm system. Each morning, the on-site manager will disable the overnight alarm system and check the surveillance cameras and recordings to ensure the system is functioning as expected. The last agent to leave the facility each night will activate the overnight devices and sensors, and lock all doors and windows that are not self-locking. Each morning, the on-site manager will disable the alarm system, and inspect the security cameras and recordings to ensure that the system is functioning as expected. The security system is self-diagnosing and will alert the management if there is a malfunction. The security system will be tested by management on a regular basis.

During emergencies, all employees and any visitors will report to the primary safe area (Lobby). Management will determine if evacuation of the building to the secondary safe area is necessary. Visitors and employees will be accounted for while waiting for local emergency officials to respond. When any dangerous, threatening, or unauthorized activity is reported to local law enforcement, employees will comply with directives and remain in a safe location while the incident is addressed. After the emergency is resolved, employees will look for property damage, verify cash and inventory, and submit all necessary documentation to law enforcement officials for a police report. Surveillance footage will be downloaded and submitted to police officials to aid in their investigation, and authorized officials will be given direct phone numbers to ownership and agents to ensure a good working relationship. Any required notifications to AMCO will be made within 24 hours of the event.

3.6. Describe your policies and procedures for preventing diversion of marijuana or marijuana product, including by employees:

Video surveillance will continuously monitor the manufacturing facility. Employees will perform mandatory inventory counts each week and document the reports as business records. The company has a zero tolerance policy for theft and diversion, and all employees will complete mandatory training in recognizing such activity. In the event that theft or diversion is suspected, all employees will alert management immediately. In the event that an employee is caught stealing marijuana, Secret Garden Cannabis will notify local law enforcement immediately, comply with all directives, and provide all necessary information and records for the investigation. Ownership will take the necessary steps to ensure that illegal conduct by an employee does not compromise the facility's license and legitimate business operations and follow company disciplinary protocols, including employee termination when necessary. Once a theft is reported, ownership will update the product records in the tracking system, as needed, to maintain an accurate and comprehensive accounting for all marijuana products and inventory. Ownership will comply with all inquiries and investigations lodged by the MCB as a result. Documentation related to marijuana theft will be maintained as a business record for five (5) years and made available to the MCB upon request. All marijuana product will be secured in the locked storage areas of the manufacturing facility once it is ready and waiting for packaging. Only designated personnel will have access to marijuana storage. Constant surveillance will monitor the marijuana storage spaces and all individuals entering the area. Video recordings will be backed up and stored for forty (40) days. Cameras will be prominently displayed in the manufacturing facility and will provide a full view of the facility. Security monitors and video recording equipment will be located in the Security Room on the second floor of the building in Cultivation and available remotely to SGC Management.

3.7. Describe your policies and procedures for preventing loitering:

The company will prevent business practices that might entice or allow loitering, and escort all loitering individuals off the premises. The exterior will be well lit and equipped with 24 hour video surveillance and "No Loitering" signs. Agents of the facility will have a noticeable presence around the property to monitor for and deter loitering and unauthorized entrance. The manufacturing facility will have no direct entrance from outside. Any individuals found loitering outside the building will be asked to leave the premises or law enforcement will be notified. Once a visitor has completed their visit and no longer has a purpose inside the facility, they will be escorted off of the premises. No visitors will be permitted to remain on the property after their escorted visit has concluded. Company agents will contact local law enforcement for assistance when necessary.

You must be able to certify the statement below. Read the following and then sign your initials in the box to the right: Initials

3.8. I certify that if any additional security devices are used, such as a motion detector, pressure switch, and duress, panic, or hold-up alarm, to enhance security of the licensed premises, I will have written policies and procedures describing their use. JT

Video Surveillance (3 AAC 306.720):

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box: Initials

3.9. The video surveillance and camera recording system for the licensed premises covers each restricted access area, and both the interior and exterior of each entrance to the facility. JT

3.10. Each video surveillance recording: is preserved for a minimum of 40 days, in a format that can be easily accessed for viewing (consistent with the Alcohol & Marijuana Control Office's approved format list); clearly and accurately displays the time and date; and is archived in a format that does not permit alteration of the recorded image. JT

3.11. The surveillance room or area is clearly defined on the Form MJ-02: Premises Diagram that is submitted with this application. JT

3.12. 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 where access is limited to the licensee(s), an authorized employee, and law enforcement personnel (including an agent of the Marijuana Control Board). JT

3.13. 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:

Surveillance cameras will be positioned along the building with ample lighting, and checked regularly to prevent obstructions and to get the best facial image of anyone within twenty (20) feet of all access points (there are no exterior access points to the manufacturing facility). Video surveillance cameras will be placed strategically to record all areas of the facility inside and outside, at a variety of angles. All doors and marijuana storage areas will have video coverage to clearly identify the faces of those present. Cameras mounted on the exterior of the facility will record activity at all exterior access doors. A failure notification system will be installed to provide e-mail and/ or text notification of any failure in the surveillance system so that it can be immediately resolved. During a power outage all cameras and recording equipment will be run on battery backup for at least 30 minutes.

3.14. Describe the locked and secure area where video surveillance recording equipment and original copies of surveillance 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 Marijuana Control Board. If you will be using an offsite monitoring service and offsite storage of video surveillance records, your response must include how the offsite facility will meet these security requirements:

All surveillance recording equipment, footage and backups will be stored in the Security Room located in the Cultivation Facility. The licensee will ensure that all security requirements of 3 AAC 306.720(d) are met. The licensee will have 40 days of back up storage of surveillance records at the licensed premises and copies of required business records at the licensed premises as well. The Security Room will be accessible only by authorized agents, and will have an advanced, reinforced security door, locked at all times. The door will be equipped with an employee swipe card entry system, and a spring-loaded hinge. Ownership will have remote access to surveillance recordings to monitor operations virtually. The security system will be password protected to prevent any data tampering, and recorded data will be stored for a minimum of forty (40) days as an official business record. All surveillance footage will be accessible for upload to a separate hard drive in the event that it must be stored longer for criminal, civil, or administrative investigations. All recordings will be time and date stamped, and archived in a format that prevents alteration of the recorded image. Recordings and surveillance data will be available to the MCB and local law enforcement upon request.

Section 4 – Business Records

Review the requirements under 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.

4.1. I certify that the following business records will be maintained and kept on the licensed premises: Initials

a. **all books and records necessary to fully account for each business transaction conducted under my license for the current year and three preceding calendar years** *(records for the last six months must be maintained on the licensed premises; older records may be archived on or off-premises)*; JT

b. **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;** JT

c. **the business contact information for vendors that maintain video surveillance systems and security alarm systems for the licensed premises;** JT

d. **records related to advertising and marketing;** JT

e. **a current diagram of the licensed premises, including each restricted access area;** JT

f. **a log recording the name, and date and time of entry of each visitor permitted into a restricted access area;** JT

g. **all records normally retained for tax purposes;** JT

h. **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;** JT

i. **transportation records for marijuana and marijuana product, as required by 3 AAC 306.750(f); and** JT

j. **registration and inspection reports of scales registered under the Weights and Measures Act, as required by 3 AAC 306.745.** JT

4.2. 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:

All business records, including operational and regulatory documents, recordings, surveillance, financial books, inventory and employment records, logs, manifests, and communications, will be stored for a minimum of 6 months in Product Manufacturing. ~~the Security Room located in the Cultivation Facility~~. Facility records will be managed by authorized agents in accordance with standard retention policies to ensure that business records are stored in a consistent and searchable manner. ~~Records within the facility will be stored in the Security Room separate from all storage of marijuana products and currency. The owner, management team, and authorized agents will have access to the Security Room and business records. A commercial grade door with card access locking mechanism will be used to separate the Security Room from the rest of the facility.~~ The required 6 months of business records will be stored within the licensed premises on a password protected computer. When not in use by authorized personnel the computer will be stored in a locked and secured file cabinet with any additional hard copy records.

Received by AMCO 9.18.18

Section 5 – Inventory Tracking of All Marijuana and Marijuana Product

Review the requirements under 3 AAC 306.730. All licensed marijuana establishments must use a marijuana inventory tracking system capable of sharing information with Metrc 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 is propagated from seed or cutting, through transfer to another licensed marijuana establishment, or use in manufacturing a marijuana product, to a completed sale of marijuana or marijuana product, or disposal of the harvest batch of marijuana or production lot of marijuana product.

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box: Initials

5.1. My marijuana establishment will be using Metrc, and if any other tracking software is used, it will be capable of sharing information with Metrc. JT

5.2. All marijuana delivered to a marijuana establishment will be weighed on a scale registered in compliance with 3 AAC 306.745. JT

5.3. My marijuana establishment will use registered scales in compliance with AS 45.75.080 (Weights and Measures Act), as required by 3 AAC 306.745. JT

Section 6 – Employee Qualification and Training

Review the requirements under 3 AAC 306.700. 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, must obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment.

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box: Initials

6.1. 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. JT

6.2. 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 licensed premises) when on the licensed premises. JT

6.3. 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. JT

6.4. Describe any in-house training that will be provided to employees and agents (apart from a marijuana handler course):

The licensee and all employees will be required to obtain a marijuana handler permit from AMCO Enforcement prior to beginning employment and must keep the permit valid and in good standing at all times while employed with Secret Garden Cannabis. Qualified agents will be hired on a three (3) month probationary period during which they will be trained in their position, receive regular education and evaluation from ownership and management, and cross-trained to ensure that no positions are vacant. Training education will include marijuana industry topics, safety, compliance, customer care, legal issues, state and federal regulations, and OSHA, and will take place throughout the year as well as when topics arise. Employees will be expected to learn: (1) Alaska laws, regulations, and codes governing the marijuana industry and marijuana establishments; (2) all of the permitting requirements to act as a handler in a marijuana establishment; (3) company standards, protocol, and best practices; (4) general safety procedures and protocol; (5) how to think defensively in threatening situations and how to recognize the signs of impairment, drug abuse, and instability; (6) in-depth information about particular strains and products; (7) in-depth information on the requirements of each room, task, and system; and (8) the general federal, state, and local employment regulations by which the Company is governed. Employees will meet with management monthly for continued education and evaluation. Managers will be trained in opening and closing procedures, safety protocol, and managing operations and the inventory tracking system. Managers will also be trained to implement all procedures for quality control, inventory control, and sanitation, and will be responsible for keeping accurate accounting records and overseeing compliant facility operations. Agents will be educated on quality control, inventory control, sanitation, opening and closing, manufacturing techniques and best practices, security protocols, and ongoing compliance with all new and existing state and local regulations. Agents will be trained on how to use the inventory tracking system and how to interact with visitors while in production. Agents will attend a general security class at hiring, and learn how to handle security and emergency procedures. The agents will be given in-depth education on the products that are produced and sold, cannabis consumption risks and effects, and all of the mandated information included in the handler's permit. Agents will also be trained in cash policies and how to record inventory. The state and local marijuana regulations and laws will be posted in spaces frequented by the staff, and all new hires will be required to meet with ownership to go over employment documents, tasks, educational materials, facility features, security, position-specific training, and to receive their uniform and supplies at hiring.

Section 7 – Health and Safety Standards

Review the requirements under 3 AAC 306.735.

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box:	Initials
7.1. I understand that a marijuana establishment is subject to inspection by the local fire department, building inspector, or code enforcement officer to confirm that health or safety concerns are not present.	JT
7.2. I have policies regarding health and safety standards (including: ensuring a person with an illness or infection does not come into contact with marijuana or marijuana product; good hygienic practices; cleaning and maintenance of equipment and the premises; pest deterrence; chemical storage; sanitation principles; and proper handling of marijuana and marijuana product) and will take all reasonable measures and precautions to ensure that they are met or exceeded.	JT
7.3. I have policies to ensure that any marijuana or marijuana product that has been stored beyond its usable life, or was stored improperly, is not salvaged and returned to the marketplace.	JT
7.4. I have policies to ensure that in the event information about the age or storage conditions of marijuana or marijuana product is unreliable, the marijuana or marijuana product will be handled in accordance with 3 AAC 306.735(d).	JT

Answer "Yes" or "No" to each of the following questions:	Yes	No
7.5. Adequate and readily accessible toilet facilities that are maintained and in good repair and sanitary condition are clearly indicated on my Form MJ-02: Premises Diagram.	✓	
7.6. Convenient handwashing facilities with running water at a suitable temperature are clearly indicated on my Form MJ-02: Premises Diagram.	✓	

7.7. If you answered "No" to either 7.5 or 7.6 above, describe how toilet and/or handwashing facilities are made accessible, as required by 3 AAC 306.735(b)(2):

n/a

Section 8 – Transportation and Delivery of Marijuana and Marijuana Products

Review the requirements under 3 AAC 306.750.

8.1. Describe how marijuana or marijuana product will be prepared, packaged, and secured for shipment. Include a description of the type of locked, safe, and secure storage compartments to be used in vehicles transporting marijuana or marijuana product:

For all transports of marijuana products the establishment will create a METRC generated Trip Manifest. All Trip Manifests will be sent with the products, and an additional copy will be stored and filed on the premises as an official business records. The Manifest documents will clearly have the type of product, batch number, weight, name of the transporter and handlers ID, time of departure and expected delivery, and the make, model, and license plate of the transporting vehicle. All marijuana product will be in a sealed package or container not exceeding more than five (5) pounds and then stored in a locked storage compartment within the transport vehicle. The transport vehicle will travel directly between destinations without making any unnecessary stops and at no time during transit will marijuana products be directly visible. All marijuana product packaging will have a label stating that a licensed testing facility has tested each batch in the shipment. All packaging materials that will be sold to marijuana establishments for sale to consumers will be child-proof and unappealing to children. All packaging done at the facility will be performed in a specific 24 hour surveillance monitored area and will then be packaged in a uniform matter with labels secure and clearly displayed. Packaged marijuana product will be stored in a secured area until ready for display or transport, and will be inspected, accepted or rejected, and recorded in an official log. The company will check all packages to make sure that they will keep all marijuana product from contamination and will check to make sure that the packages will not impart any toxic or deleterious substance to marijuana product. Secret Garden Cannabis will use certified scales in compliance with the Alaska Weights and Measures Act, and will maintain registration and inspection reports at the facility. Reports will be available upon request for AMCO.
Any vehicle transporting marijuana will be unmarked and inconspicuous. Vehicles that will be used for transportation of marijuana will contain, or have affixed or mounted, a secure and sanitary lock box, that is either enclosed by the vehicle or affixed to the bed of the vehicle or trunk of the vehicle that will lock and will ensure the 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. Prior to departure, a manager will ensure all marijuana is in sealed packages, and locked in the safe and secure storage compartment in the transport vehicle. All employees will be trained and will understand that under no circumstances (absent instruction from a duly authorized law enforcement officer) shall a sealed package containing marijuana be opened during transportation. The structure will be formed of steel, hard plastic or like materials. From time to time ownership may utilize a third party for transport and shall ensure the third party transport company has their Marijuana Handlers' card.

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box: Initials

8.2. 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. JT

8.3. 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. JT

8.4. 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. JT

8.5. 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. JT

8.6. 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. JT

8.7. 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. JT

8.8. The marijuana establishment will refuse to accept any shipment of marijuana or marijuana product that is not accompanied by the transport manifest. JT

Section 9 – Signage and Advertising

9.1. Describe any signs that you intend to post on your establishment with your business name, including quantity, dimensions, graphics, and location on your establishment (photos or drawings may be attached):

There will be 1 sign with the business name "Secret Garden Cannabis" on it visible to the general public affixed to the building or free standing if the current regulation and muni codes are modified to allow such. The sign will not exceed 4,800 square inches.

9.2. Describe any advertising you intend to distribute of your establishment. Include medium types and business logos (photos or drawings may be attached):

Secret Gardens' advertising and marketing is still in development; however, the company plans to utilize the following medium types when distributing advertisements:

- newspaper ads
- radio & TV ads
- social media to feature specific strains
- magazine ads
- text messaging

Advertisements will include the following logo, the retail store hours and location, and will include each warning statement verbatim as they are listed in the regulations.

I declare under penalty of unsworn falsification that this form, including all accompanying schedules and statements, is true, correct, and complete.

Signature of licensee

James M.P. Thornton

Printed name of licensee

"Official Seal"
Notary Public
Charlotte Selvester
State Of Alaska
Commission # 171117019 Expires 11/17/2021

Notary Public in and for the State of Alaska

My commission expires: 11/17/2021

Subscribed and sworn to before me this 17th day of August, 2018.

(Additional Space as Needed):

Alcohol and Marijuana Control Office
550 W 7th Avenue, Suite 1600
Anchorage, AK 99501
marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
Phone: 907.269.0350

Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

What is this form?

This operating plan supplemental form is required for all applicants seeking a marijuana product manufacturing facility license and must accompany **Form MJ-01: Marijuana Establishment Operating Plan**, per 3 AAC 306.020(b)(11). Applicants should review **Chapter 306: Article 5** of the **Alaska Administrative Code.** This form will be used to document how an applicant intends to meet the requirements of the 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 and 3 AAC 306.520(3).

What additional information is required for cultivation facilities?

Applicants must identify how the proposed establishment will comply with applicable regulations regarding the following:

- Equipment, compounds, and processes to be used
- Waste disposal
- Testing procedure and protocols
- Proposed marijuana concentrates and marijuana products
- Proposed product packaging and sample labels
- Prohibitions

This form must be completed and submitted to AMCO's main office before any new or transfer application for a marijuana product manufacturing facility or marijuana concentrate manufacturing facility license will be considered complete.

Section 1 – Establishment Information

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

Licensee:	Axion Enterprises, LLC	**MJ License #:**		12769	
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	Secret Garden Cannabis				
Premises Address:	726 E. 15th AVE Suite 2				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Section 2 – Overview of Operations

2.1. Provide an overview of your proposed facility's operations. Include information regarding the intake, flow, and transfer of marijuana, marijuana concentrate, and marijuana product at and from your premises:

All marijuana at Secret Garden Cannabis product manufacturing facility will be identified and tracked from the time the marijuana or marijuana product is received through sales and/or disposal. Tracking will include identification and acceptance of incoming marijuana or marijuana product, the use of marijuana and marijuana product for extraction and manufacture of concentrates and products, and finally sale and transfer to a retail licensee. Marijuana plant material will be processed for approved concentrate extraction and approved edibles will be produced using the marijuana concentrate. A random sample of each marijuana product manufactured at the facility will be provided to a licensed marijuana testing facility for testing per 3 AAC 306.550. The remainder of the production lot will be segregated in the secured quarantined product area until the testing results are received. All marijuana waste and/or marijuana product waste will be disposed of per 3 AAC 306.740. A METRC transport manifest will be required for all transfers between licensed facilities. For transfer to a facility other than Secret Garden Cannabis, the product will be placed inside a locked and secured storage compartment within the vehicle or affixed to the bed of a truck for transport. Secret Garden Cannabis will comply with Alaska State and Anchorage Municipality health and safety standards. All transactions will be reconciled in METRC by the end of each business day.

Section 3 – Equipment and Compounds to be Used

Review the requirements under 3 AAC 306.555.

3.1. Describe the equipment and solvents, gases, chemicals, and other compounds the marijuana product manufacturing facility will use to create marijuana concentrates:

Equipment: Commercial oven, CO2 botanical oil extractor, hydraulic rosin press, crock pot, ice water extraction bags, winterization equipment including buchner funnels, filter papers, vacuum pumps, rotary evaporator, hot plates, stir pads and distillation glassware, distillation assembly equipment including chillers, flasks, funnels, heating elements, borosilicate glassware, quartz glassware and various control electronics.

Solvents, gases, chemicals: CO2, ethyl alcohol, activated charcoal, acetone and citric acid.

Section 4 – Waste Disposal

Review the requirements under 3 AAC 306.740.

You must be able to certify the statement below. Read the following and then sign your initials in the box to the right: Initials

4.1. The marijuana product manufacturing facility shall give the board at least three days written notice required under 3 AAC 306.740(c) before making marijuana waste unusable and disposing of it. JT

4.2. Describe how you will store, manage, and dispose of any solid or liquid marijuana waste, including expired or outdated marijuana or marijuana product, in compliance with any applicable laws. Include details about the material(s) you will mix with ground marijuana waste and the processes that you will use to make the marijuana waste unusable for any purpose for which it was grown or produced:

Secret Garden Cannabis has prepared a disposal plan for disposing of all marijuana product that does not meet state testing requirements and Secret Garden Cannabis' internal quality standards for any reason, including, but not limited to, disease, infestation, and mishandling. Rendering marijuana unusable before disposal will ensure that marijuana product waste is safely kept away from the public. Secret Garden Cannabis will ensure that all marijuana product waste is rendered unusable prior to leaving the facility. The Manager will maintain a log on the status of all marijuana product waste, tacking the type of waste, the date of disposal, the date it was rendered unusable, and the date that is was picked up by the disposal company. All marijuana products marked for disposal will be stored in a secured bin, separated from all other products and materials, until they can be rendered unusable. Once rendered unusable, marijuana product waste will be placed in the facility dumpster. Marijuana waste will be rendered unusable (after giving AMCO Enforcement a 3 day notice) by grinding and/or mixing the materials with other compostable and non-compostable material until the resulting mixture is no more than fifty percent (50%) marijuana waste. Only authorized personnel will have access to the keys that lock and unlock the disposal containers. All locks will be commercial grade and UL listed. A waste truck will collect the waste and dispose of it at the city solid waste facility. The manager will make arrangements with the disposal company if ever the dumpsters are full prior to scheduled pickup.

Section 5 – Testing Procedure and Protocols

Review the requirements under 3 AAC 306.520 and 3 AAC 306.550.

You must be able to certify the statement below. Read the following and then sign your initials in the box to the right:	Initials
5.1. I will ensure that any individual responsible for collecting random samples for required laboratory testing under 3 AAC 306.455 will prepare the necessary accompanying signed statement, provide the signed statement to the marijuana testing facility, and maintain a copy as a business record under 3 AAC 306.755.	JT

Answer "Yes" or "No" to the following question:	Yes	No
5.2. Will the marijuana product manufacturing facility be performing in-house testing (as defined under 3 AAC 306.990(b)(20)?	☐	☑

If "Yes" to 6.2, you must be able to certify the statement below. Read the following and then sign your initials in the box:	Initials
5.3. The area where in-house testing will occur is clearly identified on the Form MJ-02: Premises Diagram that is submitted with this application.	

5.4. Describe the testing procedures and protocols the marijuana product manufacturing facility will follow:

Secret Garden Cannabis will comply with all requirement set forth in 3 AAC 306.550 and 3 AAC 306.645 for laboratory testing. A designated individual will select a test sample from each production lot of marijuana product manufactured at the facility. The test sample will be randomly selected and in the amount required by the licensed marijuana testing facility. A signed statement will be prepared for each test sample stating that the sample was randomly selected. Copies of the signed statement will accompany the test sample to the licensed marijuana testing facility and will be maintained as a business record. Transportation to the licensed marijuana testing facility will be per 3 AAC 306.750. The remainder of the production lot will be segregated in the secured, cool and dry quarantined product area until the testing results are received. No marijuana product from any segregated lot will be sold or transported until satisfactory written testing results are received from the licensed marijuana testing facility. All testing results will be maintained as part of Secret Garden Cannabis business records.

Section 8 – Prohibitions

Review the requirements under 3 AAC 306.510.

8.1. I certify that the marijuana product manufacturing facility will not: Initials

a. **sell, deliver, distribute, or transfer any marijuana, marijuana concentrate, or marijuana product directly to a consumer, with or without compensation;** JT

b. **allow any person, including a licensee, employee, or agent, to consume marijuana, marijuana concentrate, or marijuana product on the licensed premises; or** JT

c. **manufacture or sell any product that is an adulterated food or drink, closely resembles a familiar food or drink item including candy, or is packaged to look like candy, or in bright colors or with cartoon characters or other pictures or images that would appeal to children.** JT

I declare under penalty of unsworn falsification that this form, including all accompanying schedules and statements, is true, correct, and complete.

Signature of licensee

"Official Seal" Notary Public Charlotte Selvester State Of Alaska Commission # 171117019 Expires 11/17/2021

James M.P. Thornton

Printed name of licensee

Notary Public in and for the State of Alaska

My commission expires: 11/17/2021

Subscribed and sworn to before me this 17th day of August, 2018.

(Additional Space as Needed):