Alcohol and Marijuana Control Office
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Anchorage, AK 99501
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Phone: 907.269.0350

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:	DENALI FIRE BROWN LLC	**MJ License #:**	14619		
License Type:	PRODUCT MANUFACTURING				
Doing Business As:	DENALI FIRE EXTRACTS				
Premises Address:	6209 MIKE ST STE 2B				
City:	ANCHORAGE	**State:**	Alaska	**ZIP:**	99518

Mailing Address:	500 W INTERNATIONAL AIRPORT RD STE F				
City:	ANCHORAGE	**State:**	Alaska	**ZIP:**	99508

Designated Licensee:	ELI LEHRMANN		
Main Phone:	907-440-4047	**Cell Phone:**	
Email:	eslehrmann@gmail.com		

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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 persons under the age of twenty-one (21), be permitted to gain access to the premises. All persons entering the facility will be directed to enter through the office door, where they will be required to check-in with a designated employee. Signage outside the door will be posted stating "No one under 21 Years of Age Allowed" and "Restricted Access Area. Visitors must be Escorted". At check-in, all visitors will be required to present a valid government issued photo identification, showing that they are at least twenty-one (21) years of age or older. A valid form of ID will include: 1) an unexpired, unaltered passport; 2) an unexpired, unaltered drivers license; and 3) an identification card issued by a federal or state agency, authorized to issue valid identification.

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 an 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 forged 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 the licensees via text message. Multiple signs stating that the premises is secured and monitored and that visitors must be escorted will be prominently displayed, including "Restricted Access Area. Visitors must be Escorted". The interior of the facility will have security cameras installed for 24 hour monitoring of the facility. The exterior of the building will have 24 hour surveillance cameras recording all activity on the premises. Visitors will be required to provide valid state-issued identification, with no exceptions. Visitors will be given a visitor badge to be displayed on their person at all times within the facility. All visitors will be escorted by an employee at all times at a 5:1 ratio. Cameras will also be placed conspicuously at each exterior door to the building (the manufacturing facility has no exterior doors, entrance to the manufacturing facility is through the office) 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:

Only visitors who have been pre-approved and pre-scheduled will be admitted into the manufacturing facility. Visitors will be instructed to check in at the office where they will be required to present a valid government issued photo identification and sign in to the visitor's log. Because individuals must go through the cultivation facility in order to access the entrance to the manufacturing facility, visitors will be required to sign in to the visitor log for both the cultivation facility and the manufacturing facility. The log will record the visitor's full name, date, time in and out of each facility and the purpose of the visit. The log will be retained in the office as an official business record and will be made available to an agent of the MCB upon request. Each visitor will be given a visitor badge and will be required to display it on their person at all times while in the facilities. 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.

Visitors will sign into a visitor's log noting their name, the date, time in and out of the facility, and the purpose of their visit. The log will be retained as a business record and will be kept in the secured, shared office located next to the cultivation facility and only the licensees and authorized employees will have access to the locked cabinet where records are stored. Visitors will be escorted by an employee at all times while inside the facility, and any additional information, activity, or behavior will be recorded, as necessary, during the visit.

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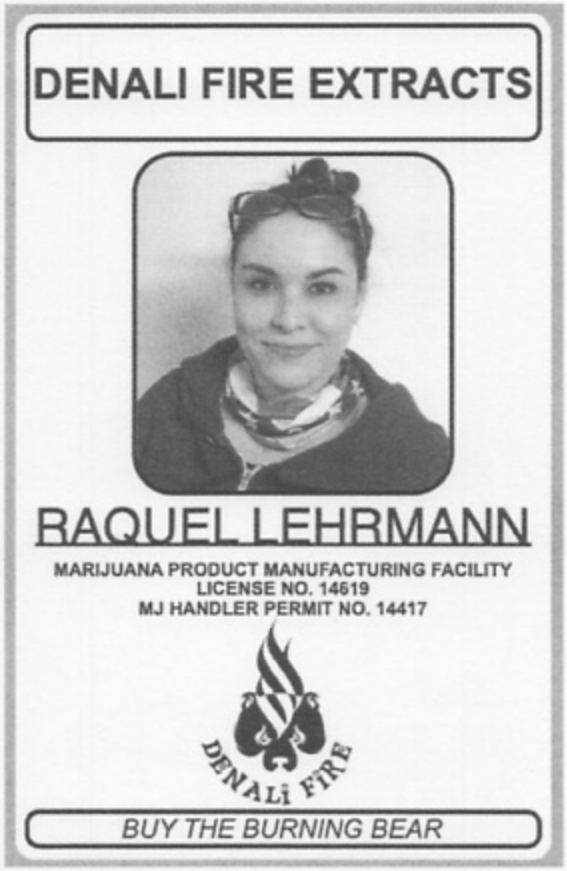
3.3. Provide samples of licensee-produced identification badges that will be displayed by each licensee, employee, or agent while on the premises, and of visitor identification badges that will be worn by all visitors while in restricted access areas:



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 lights will be installed against the building, 3 High Intensity Discharge (HID) lights in front and 1 on the exterior door in the back, in order to keep the premises, signs, and doors lit and to ensure video surveillance cameras are capable of recording individuals within 20 feet from any entry point to the facility (the only exterior entry point to the manufacturing facility is through the office next to the cultivation facility). Light fixtures will be installed in such a way to thwart vandalism and common obstructions. The licensees or designated employee will inspect exterior lighting frequently to ensure proper functionality and position for optimal recording and to deter criminal activity on the premises.

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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:

The licensees will install the alarm system and a third party security alarm company will maintain its equipment, test the devices and continuously monitor the facility at an off-site center to ensure the safety of the property and to detect unauthorized activity. The alarm system will be set up to monitor for intrusions with motion detectors in all areas of the building, during closed hours. When triggered, an electronic alert will be automatically sent to the security company and a text message to the licensees who will then contact local law enforcement if necessary. The licensees 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 employee to leave the facility each night will activate the overnight devices and sensors.

There are no windows at the manufacturing facility. A sensor will be installed on the only exterior door to the facility (which is the one to office next to the cultivation facility) to monitor for motion, intrusion, or activity when the alarm system is activated. The last employee to leave the facility each day will activate the overnight security devices and sensors. The alarm system will be active at all times that the facility is closed, and any attempted intrusion will initiate an immediate and electronic notification to the off-site security monitoring center and the licensees' cell phone via text message. Each morning, an employee will disable the alarm system, and inspect the security cameras and recordings to ensure that the system is functioning as expected.

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, employees will be trained to alert management immediately. In the event that an employee is caught stealing marijuana, Denali Fire Extracts will notify local law enforcement immediately, comply with all directives, and provide all necessary information and records for the investigation. The licensees 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, the licensees will update the product records in the tracking system, as needed, to maintain an accurate and comprehensive accounting for all marijuana products and inventory. The licensees 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 one hundred and twenty (120) 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 main office located next to the cultivation facility.

3.7. Describe your policies and procedures for preventing loitering:

A "No Loitering" sign will be prominently posted on the exterior of the building. Loitering outside the facility will be met with a request from employees to leave the premises. The loitering individual will be given a verbal warning that law enforcement will be notified if they do not comply. Designated management will complete a walk around of the facility to look for suspicious activity or lingerers who have no legitimate business being on the property and ask them to leave if sighted. The last resort is to reach out to law enforcement personnel for assistance. The facility will have a single and secure entrance for all regular ingress and egress from the building and for all visitors, which will be through the office located next to the cultivation facility. The entrance and perimeter of the building will be monitored by security cameras at all times. Agents will maintain a regular and noticeable presence around the property to deter unauthorized entrance. The licensees and managers will work with the security company and local law enforcement, if necessary, to secure the premises, prevent business practices which could entice or allow loitering, and escort all loitering individuals off the premises as soon as possible. Designated management or Licensees will maintain a regular periodic check around the property to deter any unauthorized persons.

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. EL

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

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:

Exterior surveillance cameras will be placed to record all entry points (the only entrance to the manufacturing facility is through the office next to the cultivation facility) to the facility, marijuana and concentrate storage areas, the office and surveillance equipment areas and manufacturing areas. Cameras will be inspected frequently for proper functionality and positioning to ensure ability to identify the faces of individuals inside the facility and within 20 feet of any entry point. Video surveillance recording equipment will run on emergency power for at least 1 hour in the event of a power outage.

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 and footage will be stored in the secured office (shared with the cultivation and retail facilities), in a locked and secured cabinet, with hard drive backups on site. Business records and data will also be backed up the Cloud to further ensure no loss or destruction of records. The office will be accessible only by licensees and employees and the business records will be stored in a locked cabinet only accessible to the licensees and manager on duty. The door will be equipped with a spring-loaded hinge to ensure closing. The security system will only be accessible with a password (given only to authorized individuals), so no tampering with data will be possible. Data will be stored on the security system's DVR for a minimum of one hundred and twenty (120) days. Data has the ability to be uploaded to a separate hard drive to maintain records for longer than one hundred and twenty (120) days if there is a pending criminal, civil, or administrative investigation. These recordings will include the time and date stamp, and will be archived in a format that does not permit alteration of the recorded image. Recordings will be available to AMCO and local law enforcement upon request.

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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)*; EL

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;** EL

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

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

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

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

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

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;** EL

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

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

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 on-site in the office, and backed up on a hard drive backup every 6-12 months to protect from loss and destruction and to allow the licensees and designated authorities access at any time. Business records and data will also be backed up to the Cloud to further ensure no loss or destruction of records. 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 search-able manner. Records within the facility will be stored in the secured office in a locked cabinet, separate from all storage of marijuana products and currency. Only licensees, employees, and authorized agents will have access to the office and only the licensees and manager on duty will have access to the cabinet that houses business records. A commercial grade door with commercial grade locking mechanisms will be used to separate the office from the cultivation facility.

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

Section 6 Employee Qualification and Training

Review the requirements under 3 AAC 306.700. All licensees, and every 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. All licensees, and each 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.	EL
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.	EL
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.	EL

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

All licensees, management and staff will be required to obtain an AMCO issued marijuana handler permit before employment can begin and will be responsible for keeping the permit in good standing at all times while employed with the facility. All employees will also be required to attend a training course taught by Denali Fire Extracts licensees or a designated manager. Training will include marijuana industry topics, safety, customer care, legal issues, state and federal laws and regulations. Employees will be educated on quality control, inventory control, sanitation, opening and closing, manufacturing techniques and best practices, and security. Employees will be trained on how to use the inventory tracking system and how to interact with visitors while in production. Employees will be provided with a general security training and learn how to handle security and emergency procedures. The state and local marijuana regulations and laws will be posted in the facility.

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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.	EL
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.	EL
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.	EL
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).	EL

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):

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 Denali Fire Extracts will create a METRC generated Trip Manifest, this includes transports to the co-located retail store also owned by the licensees. All Trip Manifests will be sent with the products, and an additional copy will be stored and filed on the premises as 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-resistant 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 manner with labels secure and clearly displayed. Packaged marijuana product will be stored in a secured area until ready for 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 the marijuana product. Denali Fire Extracts 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 a secure and sanitary area affixed to the inside of the transportation vehicle or bed of a truck 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, an employee will ensure all marijuana is in sealed packages, and locked in the safe and secure storage compartment in the transport vehicle or bed of the truck. 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 vehicle storage box will be a large rectangular industrial container mounted and secured within the vehicle, accessible by a combination or key lock. 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' and understands the state regulations pertaining to transportation of marijuana.

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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. EL

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. EL

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. EL

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. EL

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. EL

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. EL

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

Section 9 – Signage and Advertising

Review the requirements under 3 AAC 306.770.

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

Denali Fire Extracts will not post any signs to the manufacturing facility with the business name or logo, on the exterior of the establishment or the building.

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Form MJ-01: Marijuana Establishment Operating Plan

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

The facility will not advertise to the public, but rather only to licensed manufacturers and retail stores, via email, social media or in person.

DENALI FIRE

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

Signature of licensee

Notary Public
J. ARANETA
State of Alaska
My Commission Expires Dec. 1, 2020

Notary Public in and for the State of Alaska

ELI LEHRMANN

Printed name of licensee

My commission expires: Dec. 1, 2020

Subscribed and sworn to before me this 16 day of SEPTEMBER, 2019.

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