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

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:	BRO BRO Budz, LLC	**MJ License #:**	18516		
License Type:	STANDARD MARIJUANA CULTIVATION FACILITY				
Doing Business As:	BRO BRO BUDZ, LLC.				
Premises Address:	13025 WEST WESTIN DRIVE				
City:	HOUSTON	**State:**	Alaska	**ZIP:**	99623

Mailing Address:	PO Box 879163				
City:	WASILLA	**State:**	Alaska	**ZIP:**	99687

Designated Licensee:	ALEXANDER JAY LOWENSTEIN		
Main Phone:	907-885-7460	**Cell Phone:**	907-885-7460
Email:	coleybear89.ng@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:

This is a standard marijuana cultivation facility (outdoors) and will not be open to the public. No tours or leisure visits are permitted within the licensed premises areas or any portion of this licensed facility including restricted areas. Any visitor to this part of the licensed premises will have to be able to prove: over 21 years of age via valid ID: State or federal, drivers license, passport etc., and a need to be escorted into any restricted access area. If a need is determined, visitor's identification will be screened, and the visitors log will be filled out. Visitor will wear an identification tag at all times while in the facility. No more than 5 visitors per employee or agent will be permitted in the facility at a time, in accordance with applicable laws and AMCO regulations. All doors (and those entering hoop style greenhouses) to this outdoor cultivation facility will remain locked at all times and the fence surrounding the licensed premises will also be locked at all times. No handling of the marijuana will occur except by the licensee, its employees or agents and not by and visitors. Harvested marijuana will be stored in a locked safe bolted to the floor within a locked storage container (Conex). Grow, veg, clone and bud hoop style greenhouses and all other storage areas will be secured and locked. Video surveillance will record all entries, exits to the fenced areas, within and outside of the greenhouses and storage areas within the licensed facility.

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 facility in not open to the public. The Applicant/licensee requires all visitors to call ahead and establish an appointment at the facility before they arrive. Upon arrival, an employee escort who will request identification from the visitor, complete the visitor's log, and issue a visitor's badge shall greet visitors. Valid forms of identification include an unexpired, unaltered passport; a driver's license or permit; or an identification card of any U.S. state or province or territory of Canada. Anyone without identification and/or under the age of 21 may not enter the cultivation facility. The designated employee shall record the information pertaining to the visit on a visitor's log and issue a visitor's identification badge before entering the restricted area. Information on the visitor's log includes name, date of birth, current date, time in/out, email address or phone number, and the employee escort's name. The visitor shall wear the badge while on premises. The employee escort is required to remain with the visitor and is responsible for noting the time the visitor leaves and retrieving the visitor's badge. The Visitor Policy shall apply to all facility visitors including, but not limited to, contractors, wholesale purchase customers, and delivery/transportation drivers. This list is not exhaustive. No more than five visitors per escort. All restricted access areas will be clearly marked and remain locked and closed.

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

A logbook to record the persons full name, date of visit, time of entry and departure and nature/purpose of visit will be maintained. Visitor's I.D. numbered badges will also be required to be worn at all times while upon the premises. Badges will be returned at the end of said visit and they will be accounted for at the end of each visit as well. The Applicant requires all visitors to call ahead and establish an appointment at the facility before they arrive. Upon arrival, an employee escort who will request identification from the visitor, complete the visitor's log, and issue a visitor's badge shall greet visitors. Valid forms of identification include an unexpired, unaltered passport; a driver's license or permit; or an identification card of any U.S. state or province or territory of Canada. Anyone without identification and/or under the age of 21 may not enter the cultivation facility. The designated employee shall record the information pertaining to the visit on a visitor's log and issue a visitor's identification badge before entering the restricted area. Information on the visitor's log includes name, date of birth, current date, time in/out, email address or phone number, and the employee escort's name. The visitor shall wear the badge while on premises. The employee escort is required to remain with the visitor and is responsible for noting the time the visitor leaves and retrieving the visitor's badge. The Visitor Policy shall apply to all facility visitors including, but not limited to, contractors, wholesale purchase customers, and delivery/transportation drivers. No more than five visitors per escort. All restricted access areas will be clearly marked and remain locked and closed until a need for them to be opened is determined.

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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:

See attached.

BRO BRO BUDZ, LLC.
EMPLOYEE:

ALEXANDER JAY LOWENSTEIN
PHOTO GOES HERE

HANDLER PERMIT NO. ____

BRO BRO BUDZ, LLC.

VISITOR

Badge #: ___1___

Employee and visitor badge examples

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:

Commercial type exterior lighting will be provided at all facility entrances and exits and each side of the hoop style greenhouses. Some of the lighting will be motion sensitive if desired or on at all times. Security cameras will be I.R. capable, and the field of view will cover the approach up to each exterior door. Security cameras will record 24 hours per day, seven days per week, 365 days per year for a minimum of 40 days as per AMCO regulation.

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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 alarm system that will be in use at the proposed facility will be provided and installed by Cardozo Integrated Security, Valkyrie Security or similar company and monitored by Alarm.com or similar company. The system will be comprised of main control panels with panic functions for fire, emergency and medical. Hold up alarms (silent alarms), multiple interior motion sensors, and door sensors for all doors. There are no windows as this is an outside grow being done in hoop style greenhouses. Motion detectors in all greenhouses and covering all doors and grow areas. Internal and external siren, a panic pendant style device may also be incorporated into the alarm system. All to be monitored at all times when activated during closed hours. Alarm system controls will be wall-mounted in the vicinity of the main entrance of the proposed facility. Any time the facility is left unmanned, the alarm system shall be "active". All doors and exits will be monitored 24 hours a day, 7 days a week.

The video system to be self-installed by the applicant/licensee, will record 24 hours per day, seven days per week, 24 hours per day in excess of 40 and capability of up to 90 days with day, date and time stamps. Motion Detectors are integrated into the security system. Areas covered by motion sensors and cameras are also viewable via cellular telephone or laptop device. In the event of a motion related alarm, Licensee or designated agent will view the camera feed from inside the proposed facility or other location to determine if any further action is necessary. The panic pendant may be used in the event of any perceived security breach as well as silent alarm buttons/switches to be activated in case of hold up or other emergency that may arise.

Procedures for a notification of security breach: If facility is staffed, assess situation and take appropriate action. Call 911 if necessary. If the situation allows, remain at facility to assist law enforcement.
If facility is vacant. Licensee or authorized agent are to return to facility to assist law enforcement once the area is made safe by law enforcement. Law enforcement will be notified immediately by the alarm monitoring company should the alarm be set-off or for fire or other emergency. They will then respond. All employees, agents of licensee and licensee will cooperate with members of law enforcement. AMCO will be notified immediately and no less than 24 hours after the occurrence.

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

All marijuana product on premises will only be handled by licensee, employees or agents designated by licensee. All will have the required marijuana handler's card. Licensee, employee or agent will be present at transfers of marijuana product to ensure integrity of shipment. All marijuana product on premises will be logged in and tracked in accordance with Franwell/METRC system from seed to sale. Video cameras will run 24 hours per day, 365 days per year both indoors and outside as previously designated and will be stored for a minimum of 40 days minimum with a maximum of 90 days as required. Should any diversion occur, a review of the video surveillance tapes both from the inside and outside will help to catch any perpetrator and proper action may be taken. Furthermore, the tracking system and recorded weights of marijuana product will detect any change to our marijuana supplies, so that action may immediately be taken which includes notification to AMCO and local law enforcement. All employees including their bags, backpacks, purses etc. will be subject to search as a part of their condition of employment upon suspicion of diversion. Furthermore, employees will not be allowed personal possessions such as purses, bags, backpacks etc. within the licensed premises area and will be required to lock them within their vehicle or leave them at home. If diversion is determined to have occurred, AMCO enforcement and local law enforcement will be notified immediately.

3.7. Describe your policies and procedures for preventing loitering:

Signs will be posted stating a clear message that "No Trespassing" or "No Loitering" is permitted, and that area is video monitored 24/7. Video surveillance of the exterior areas will be available to employees inside the facility. Standard policy is to notify law enforcement of any violation these regulations or of any suspicious activity. There will be no loiterers or trespassers: None.

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. AL

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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.

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.

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

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).

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:

Entrances/exits to and from the hoop style greenhouses will have cameras (within 20 feet of each entrance/exit) trained on them from the interior and exterior in such a way that faces are easily identified. Facility entrances/exits will also have exterior cameras (within 20 feet of each entrance/exit) to monitor areas around exits to provide a view of the approach to the entrances/exits. All greenhouses and storage areas will have cameras as well covering all portions of each area. All cameras will be high definition with infrared/night vision capabilities for night viewing.

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 video surveillance will be stored in a digital format on a local device and backed up on a cloud based server. Storage will be sized appropriately to maintain at a minimum 40 days with a maximum of 90 days of recording, and a digital back-up of all data. Server rack will consist of a wall mountable, lockable cabinet sized appropriately to contain all necessary computer components. The rack will be located within the office/travel trailer located within the proposed licensed facility as set forth on the MJ-02, ensuring that only authorized personnel are able to access the video surveillance equipment. Accessibility is via password protection and only the licensee, or designated employee will have access to it. It maintains storage for over 40 days and up to 90 days and will be accessible to AMCO enforcement and/or law enforcement as well upon request. It is not accessible to the general public.

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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)*; AL

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;** AL

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

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

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

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

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

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;** AL

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

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

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 will be kept on the premises in a locked file cabinet or safe. These records will be available for inspection upon request. These records include but are not limited to: a current employee list and handler information, contact information for our vendors and video surveillance and alarm systems, records on advertising and marketing, visitor logs, tax records, premise diagram, transportation and sales records. The digital records will be backed up at the end of each business day. Security camera video will be maintained for 40 days of recording at a minimum and a maximum of 90 days. Bro Bro Budz, LLC, will provide any record required to be kept on the licensed premises to an employee of the board upon request including members of law enforcement. Any records kept off premises will be provided within no longer than 3 days of the request. Some of these records may be kept on an external hard drive and maintained within the locked cabinet and/or safe.

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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. AL

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

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. AL

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. AL

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. AL

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. AL

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

Aside from the marijuana handler's course and required testing, licensees, employees and agents will be kept current as to any change in regulation from AMCO, law enforcement (state, local or federal) as well as to any industry changes. This will be done monthly at monthly meetings between supervisor's and employees. Additional training will also be made available to all employees through applicable media, legal articles, periodicals of trade and updated handler's recertification tests as they become due for recertification as well as any other information that may became available and be applicable. The internet is also a good source for updated information as well and will be utilized. Our attorney will also keep us advised as to any AMCO rule changes as well as industry changes that would keep all persons up to date as well.

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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.	AL
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.	AL
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.	AL
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).	AL

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:

After marijuana has been harvested and processed, a sample will be taken from each batch and sent for testing. While results are pending, batch will be "quarantined" until it is deemed acceptable by the testing facility. Marijuana will be packaged in a variety of ways. Bulk batch packs of up to 5 pounds may be produced. Batches of 1.0 gram packs may also be produced as well as 1/8 oz, 1/4oz and 1 ounce packages. All labeling on all packaging will meet the standards as required for cultivators. All marijuana slated to leave the facility will be placed into a durable, tamper-evident METRC packaging prior to transport. The shipment will be accompanied by the appropriate manifest, and will be verified by the licensee or designated agent before the shipment is permitted to leave.

In accordance with 3 AAC 306.470, when we package the marijuana , we will either place in a package of 1 ounce or less, in approved packaging for the retail store to sell individually. In accordance with 3 AAC 306.475, the packaging shall have these 5 statements to be on the packaging:
(1) "Marijuana has intoxicating effects and may be habit forming and addictive.";
(2) "Marijuana impairs concentration, coordination, and judgment. Do not operate a vehicle or machinery under its influence.";
(3) "There are health risks associated with consumption of marijuana.";
(4) "For use only by adults twenty-one and older. Keep out of the reach of children.";
(5) "Marijuana should not be used by women who are pregnant or breast feeding.".

See cont'd. Response on page 11 & 11.

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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. AL

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. AL

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. AL

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. AL

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. AL

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. AL

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

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):

Signs are not anticipated as to this marijuana standard cultivation facility located outdoors.

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

Advertising may consist of local Alaska Leaf magazine, trade magazines, social media, lighters, clothing items or other items of permissible branding, website, business cards, stickers, and/or in collaboration with local and state wide retailers. It would reflect the name of the business, address, phone number, email address and company logo. The logo will not be enticing towards children. See attached logo copy. This list is merely inclusive but not exhaustive.

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

Signature of licensee

Alexander Jay Lowenstein

Printed name of licensee

LANCE G. WELLS NOTARY PUBLIC STATE OF ALASKA

Notary Public in and for the State of Alaska

My commission expires: 6.18.19

Subscribed and sworn to before me this 4th day of Sept, 2018.

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(Additional Space as Needed):

8.1 Cont'd:

Bulk marijuana products will be packaged for transport to another licensed marijuana facility in wholesale packages not to exceed five pounds. The product will be identified by a tracking label generated by the marijuana inventory tracking system.
(1) placing marijuana products within a sealed, tamper-evident shipping container;
(2) affixing a label that complies with 3 AAC 306.470 to the shipping container; and
(3) generate a transport manifest from the marijuana inventory tracking system; the transport manifest must remain with the marijuana products at all times while being transported, give a copy to the licensed marijuana establishment that receives the shipment.

The locked, safe and secure storage compartment is located behind the rear seat of our transport vehicle and will be bolted or chained in to the vehicle frame. All marijuana product will be contained within this safe. The compartment measures approximately 18" wide x 20" tall x 59" long. In the event that the proposed facility's planned transport vehicle is not available, a contract transportation/ security company such as Valkyrie Security & Asset Protection or The Transfer Answer will be utilized to carry out product transfers. It will have the required manifest attached to the outside of it as required per regulation.

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9.2 Cont'd.

Logo