Alcohol and Marijuana Control Office
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Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-04: Marijuana Cultivation Facility

What is this form?

This operating plan supplemental form is required for all applicants seeking a marijuana cultivation 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 4** 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 306.420(2).

What additional information is required for cultivation facilities?

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

- Prohibitions
- Cultivation plan
- Waste disposal
- Odor control
- Testing procedure and protocols
- Packaging and labeling

This form must be completed and submitted to AMCO's main office before any new or transfer application for a standard marijuana cultivation facility or limited marijuana cultivation 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:	BRO BRO BUDZ, LLC.	**MJ License #:**		18516	
License Type:	STANDARD MARIJUANA CULTIVATION FACILITY				
Doing Business As:	Bro Bro Budz, LLC.				
Premises Address:	13025 West Denlow Drive				
City:	HOUSTON	**State:**	Alaska	**ZIP:**	99623

AMCO Received 9/14/2018

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Section 2 – Overview of Operations

2.1. Provide an overview of your proposed facility's operations. Include information regarding the flow of marijuana from seed or clone to harvest and transfer from your premises:

Upon inspection, our seed banks will be organized into strain-specific packages, containing less than fifty seeds each, grouped and packaged in METRC, and will be tracked by and through their assigned package tag, until unpackaged and planted. Clones and seedlings will be in segregated into strain specific groups of less than fifty, physically, and within METRC. We will use clone charts, clone maps, and/or other internal procedures to ensure accountability and tracking of clones and seedlings. Once clones have reached 8" in height, they will be assigned an individual Plant ID tags within METRC, and their growth phase will be changed to vegetative. All vegetative plants will be assigned individual plant tags, which will be used to track them through to harvest. When a plant changes physical location (rooms) or growth phases, it will be tracked through plant logs and/or other internal tracking and communication documents, and will be updated in METRC. When the plants are harvested, strain specific harvest batches will be made from plants harvested on the same day. Wet waste (drying) will be logged on internal tracking forms as well as in METRC. Plant waste (root balls, stalks, leaves) will be deducted from the harvest batch within METRC and AMCO will be notified 3 days in writing before rendering unusable. Packages of Bud and Trim will be made from the harvest batch, and dry waste will be logged through internal tracking forms, through METRC, and reported to AMCO as set forth above. Each package will have a representative sample submitted, from the same package, for testing. After testing results from this "related package" has cleared testing, additional packages will be made from that package to fulfill wholesale or retail orders, which will then be tracked as they are transferred from our facility, physically, and within METRC.

We will further select homogeneous samples from our cultivation facility for random testing during our growing cycles in order to ensure the highest of quality of standards are met. See Cont'd Response.

Section 3 – Prohibitions

Review the requirements under 3 AAC 306.405 and 3 AAC 306.410.

3.1. I certify that the marijuana cultivation facility will not: Initials

a. **sell, distribute, or transfer any marijuana or marijuana product to a consumer, with or without compensation;** [Initials]

b. **allow any person, including a licensee, employee, or agent, to consume marijuana or marijuana product on the licensed premises or within 20 feet of the exterior of any building or outdoor cultivation facility; or** [Initials]

c. **treat or otherwise adulterate marijuana with any organic or nonorganic chemical or compound to alter the color, appearance, weight, or odor of the marijuana.** [Initials]

Section 4 – Cultivation Plan

Review the requirements under 3 AAC 306.420 and 3 AAC 306.430.

4.1. Describe the size of the space(s) the marijuana cultivation facility intends to be under cultivation, including dimensions and overall square footage. Provide your calculations below:

The total area under cultivation will be: 1,716.00 sq ft.

See MJ-02 previously filed.

Four (4X) outdoor hoop style greenhouses measuring 33.0' x 13.0'

Total sq ft under cultivation = 1,716.00 sq ft.

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

4.2. The proposed area(s) for cultivation are clearly identified on the Form MJ-02: Premises Diagram that is submitted with this application. [AK]

Answer "Yes" or "No" to the following question:	Yes	No
4.3. Will the marijuana cultivation facility include outdoor production?	☑	☐

If "Yes", describe the outdoor structure(s) or the expanse of open or clear ground and how it is fully-enclosed by a physical barrier:

Outdoor only grow conducted in four 33' x 13' hoop houses. The land has been cleared and the structures put in place. The entire licensed premises is surrounded by a 7' metal fence topped with 1' of barbed wire. Furthermore, the film covering the hoop houses is opaque in color and ot see through material. It is, however, translucent so as to allow adequate light to enter the hoop style green houses in order to grow the marijuana plants throughout their life cycles.

4.4. Describe the method(s) used to ensure that any marijuana at the marijuana cultivation facility, whether indoors or outdoors, cannot be observed by the public from outside the facility:

This is a completely outdoor standard marijuana cultivation facility. No indoor marijuana growing will occur. All marijuana is blocked from the public view via a 7' metal fence surrounding the entire licensed premises topped with 1' of barbed wire. The marijuana will be grown in (4) hoop style greenhouses 33' x 13'. The land has been cleared and the structures put in place. Furthermore, the film covering the hoop houses is opaque in color and not see through material. It is, however, translucent so as to allow adequate light to enter the hoop style green house in order to grow the marijuana plants throughout their life cycle.

4.5. Describe the marijuana cultivation facility's growing medium(s) to be used:

Cultivation facility will use the following growing mediums as set forth below:
Sunshine Mix No. 4 (commercial Potting soil);
Botanicare Pure Blend Pro Gro (commercial potting soil);
Botanicare Pure Blend Pro Bloom 9commercial potting soil).

4.6. Provide the complete product name and EPA registration # (if applicable) for each of the cultivation facility's pesticides and pest control products to be used. All proposed products must be on DEC's list of approved pesticides in the state of Alaska:

N/A: None to be used.

4.7. Describe all other fertilizers, chemicals, gases, and delivery systems, including carbon dioxide management, to be used at the marijuana cultivation facility:

Rapid Rooter (cloning plugs);
Clonex (rooting gel);
Wiggle Worm (worm castings);
General Hydroponics: PH Up and down solutions;
Botanicare liquid Karma;
Botanicare Cal-Mag;
Botanicare Sweet Raw;
Botanicare Clear X & Ballistic Bloom. No CO2 will be used.

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4.7. Describe the marijuana cultivation facility's irrigation and waste water systems to be used:

All marijuana plants will be watered by hand initially with a future upgrade to automated watering. All plants will have catchment trays under them so as to catch any overflow that may occur. Normal evaporation will also occur. Any additional waste water that will exist will be collected, stored and disposed of in accordance with the Hazardous Waste Collection Center (HWCC) located at the Wasilla, AK. Landfill. Since this cultivation will be producing less than 220 pounds of liquid hazardous wastes per month, they are classified as a Conditionally Exempt Small Quantity Generator (CESQG). They will be disposed of at the local landfill as set forth above pursuant to their regulations. During the spring, summer and fall months, some of the waste water will be reused upon our lawn.

Section 5 – 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

5.1. The marijuana cultivation 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. AL

5.2. Describe how you will store, manage, and dispose of any solid or liquid marijuana waste, including wastewater generated during marijuana cultivation, 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:

Solids:

Prior to deeming marijuana as waste, we will notify the AMCO 3 days in advance in writing. Once the MCB has been notified, product awaiting disposal will be separated and stored in our secure waste storage area. Our secure waste storage is secured and monitored in compliance to 3 AAC 306.715 and 3 AAC 306.720.

Upon approval, any marijuana waste, including expired marijuana products will be ground and mixed with organic material i.e. (old paper towels, grass clippings, old food product, coffee grounds, yard leaves etc.) to product a final waste product that is no more than 50% marijuana product. Once marijuana product is reconciled to be unusable for any and all intended purposes, we will transfer the waste to our on-site secured dumpster to await final disposal by Alaska Waste of similar company who will pick up the waste garbage and dispose of it will will be taken it to the local landfill for disposal by licensee, or his employee. Upon final disposal, we will record the final destination of said waste, in accordance with
3 AAC 306.740(c)

Liquids:

All plants will have catchment trays under them so as to catch any overflow that may occur. Normal evaporation will also occur. Any additional waste water that will exist will be collected, stored and disposed of in accordance with the Hazardous Waste Collection Center (HWCC) located at the local landfill. Since this cultivation will be producing less than 220 pounds of liquid hazardous wastes per month, they are classified as a Conditionally Exempt Small Quantity Generator (CESQG). They will be disposed of at the local landfill as set forth above pursuant to their regulations. During spring and summer months, the waste water will be reused upon our lawn.

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Section 6 – Odor Control

Review the requirements under 3 AAC 306.430.

Answer "Yes" or "No" to the following question:	Yes	No
6.1. Have you received an exemption from your local government for the odor control requirement set forth in 3 AAC 306.430(c)(2)?	☐	☑

If "Yes", you must be able to certify the statement below. Read the following and then sign your initials in the box:	Initials
I am attaching to this form documentation of my odor control exemption from the local government.	☐

If "No" to question 6.1., describe the odor control method(s) to be used and how the marijuana cultivation facility will ensure that any marijuana at the facility does not emit an odor that is detectable by the public from outside the facility:

Canister style, activated carbon filters will be utilized in conjunction with ducted fans within the proposed cultivation facility to prevent any marijuana odor from being detected by the public. This will keep all smell/odor from being detected outside of the premises. Ozone generator may also be used if determined to be necessary.

Section 7 – Testing Procedure and Protocols

Review the requirements under 3 AAC 306.455 and 3 AAC 306.465.

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 and agree that the board or director will, from time to time, require the marijuana cultivation facility to provide samples of the growing medium, soil amendments, fertilizers, crop production aids, pesticides, or water for random compliance checks.	AC
7.2. I will ensure that any individual responsible for collecting random, homogenous 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.	AC

7.3. Describe the testing procedures and protocols the marijuana cultivation facility will follow:

Upon notification that the board or the director require samples for random compliance checks of the proposed facility, a licensee or an authorized agent of the proposed facility will notify an independent testing laboratory (of the states' choice if applicable) to send a representative to collect the required samples. This way, a chain of custody is established, and the possibility of unintentional contamination due to improper sample collection practices is minimized.

All marijuana product batches will be tested for a battery of state required impurities and/or contaminants by a state licensed lab in accordance with 3 AAC 306.455. The facility will collect random samples from homogeneous batches of individual strains of bud or flower in the amount required by the selected testing facility. The marijuana will be segregated and quarantined in up to five (5) pound lots and kept there until the testing has been completed and the marijuana has cleared and passed the lab.

We will further select homogeneous samples from our cultivation facility for random testing during our growing cycles in order to ensure the highest of quality of standards are met.

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Section 8 – Packaging and Labeling

Review the requirements under 3 AAC 306.470 and 3 AAC 306.475.

Answer "Yes" or "No" to the following question:	Yes	No
8.1. Will the marijuana cultivation facility be packaging marijuana for a retail marijuana store to sell to a consumer without repackaging?	☑	☐

If "Yes", describe how the marijuana cultivation facility will ensure that the marijuana sold will meet the packaging requirements in 3 AAC 306.470, and provide a sample label that the facility will use to meet the labeling requirements set forth in 3 AAC 306.475:

After marijuana has been harvested and processed, a sample will be taken from each batch and sent for testing. While results are pending, the batch will be "quarantined" until it is deemed acceptable and passed by the testing facility. Marijuana will be packaged in a variety of ways. Batches of 1.0 gram packs may be produced as well as 1/8 oz, 1/4oz and up to 1 ounce packages. Pre-rolls of marijuana joint type cigarettes may also be made. 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:

See attached label.
Response Cont'd. p. 7.

Answer "Yes" or "No" to the following question:	Yes	No
8.2. Will the marijuana cultivation facility be packaging marijuana in wholesale packages?	☑	☐

If "Yes", describe how the marijuana cultivation facility will ensure that the marijuana sold will meet the packaging requirements in 3 AAC 306.470, and provide a sample label that the facility will use to meet the labeling requirements set forth in 3 AAC 306.475:

After marijuana has been harvested and processed, a sample will be taken from each batch and sent for testing. While results are pending, the batch will be "quarantined" until it is deemed acceptable and passed by the testing facility. Marijuana will be packaged in up to five pound wholesale packages for retail marijuana stores. 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 in up to five pound lots consisting of a single strain or a mixture of strains as identified on the label 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 attached label.
Response Cont'd. p. 7.

I certify that as a marijuana cultivation facility, I will submit monthly reports to the Department of Revenue and pay the excise tax required under AS 43.61.010 and AS 43.61.020 on all marijuana sold or provided as a sample to a marijuana establishment, as required under 3 AAC 306.480.

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 C. 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 14th day of Sept, 2018.

License # 18516

AMCO Received 9/14/2018

(Additional Space as Needed):

2.1 Continued Response.

Marijuana will be packaged in a variety of ways. Batches of 1.0 gram packs may be produced as well as 1/8 oz, 1/4oz and up to 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 for retail, 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 306.470, when we package the marijuana in up to five pound lots for wholesale sales, consisting of a single strain or a mixture of strains as identified on the label.

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."
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.

8.1 Continued Response:

(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.".

When a marijuana cultivation facility packages marijuana for a retail marijuana store to sell to a consumer without repackaging, the packaging may not have any printed images, including cartoon characters, that specifically target persons under 21 years of age. In addition, the packaging must protect the product from contamination and may not impart any toxic or damaging substance to the marijuana.

8.2 Continued Response:

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 generating a transport manifest from the marijuana cultivation facility's marijuana inventory tracking system; the transport manifest must remain with the marijuana at all times while being transported, and a copy must be given to the licensed marijuana establishment that receives the shipment.

See attached sample label next page.

AMCO Received 1/22/2019

SEC 8.1 SAMPLE LABEL #1

(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."

Retailer: BIG BUDS, LLC.
Retailer Lic. No. 18522
BARCODE: IIIIIIIIIIIIII
Cultivator Lic. No: 18516
Cultivator: BRO BRO BUDS, LLC

KUSH OG 1.0 Grams
Harvest Batch No. 1A34fgh1234
Net. Wt: 1.0 g = (0.03527396 oz.)
TEST: THCA: 18.48%, THC 16.6%, CBD: .06%

Lic. No. 18516

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8.2 Cont'd. Response Sample Label

BRO BRO BUDZ, LLC.

AMCO CULTIVATION LICENSE # 18516

HARVEST BATCH # KUSH 12345

MARIJUANA NET WEIGHT: 227grams
Harvest Date: 12/25/2018

WHOLESALE PACKAGE LABEL
METRC PKG ID#
1A121060124300A

MARIJUANA INFORMATION

STRAIN NAME: AK-47

STRAIN TYPE: Sativa dominant hybrid

TEST LAB: CannTest License #10009
TEST DATE: 1/25/2019
TEST RESULTS:
- TOTAL THC: 22.07% (3 month range: 18.53% - 22.29%)
- TOTAL THCA: 24.82% (3 month range: 20.55% - 25.09%)
- TOTAL CBD: .06% (3 month range: .05% - .06%)
- TOTAL CBDA: .06% (3 month range: .05% - .07%)
- TOTAL CANNABINOID: 26.97% (3 month range: 22.22% - 26.97%)
- MICROBIAL TESTING
  - E-Coli (STEC) Bacteria: Pass
  - Salmonella: Pass
  - Aspergillus: Pass
  - E-Coli (STEC): Pass

Not Tested: Herbicides, Pesticides, Fungicides, Harmful Chemicals

NUTRIENTS USED IN CULTIVATION
- Cultured Solutions Veg A
- Cultured Solutions Veg B
- Cultured Solutions UC Roots
- Cultured Solutions Bud Booster Early
- Cultured Solutions Bud Booster Mid
- Cultured Solutions Bud Booster Late
- RX Green Solutions Axiom
- Advanced Nutrients Sensi Cal-Mag
- Advanced Nutrients B-52
- Advanced Nutrients Voodoo Juice
- Botanicare Hydro Guard
- EZ Clone Clear Rez
- DynaGro Pro Tekt
- Clonex Rooting Gel
- Blue Lab pH Down
- Blue Lab pH Up
- Compost Tea

PEST PROTECTANTS USED IN CULTIVATION
- Central Coast Garden Products Green Cleaner
- General Haydroponics AzaMax
- General Hydroponics AzaPro

- NO HERBACIDES OR FUNGACIDES USED IN CULTIVATION

WARNING Marijuana has intoxicating effects and may be habit forming and addictive. Marijuana impairs concentration, coordination and judgment. Do not operate a vehicle or machinery under its influence. There are health risks associated with consumption of marijuana. For use only by adults twenty-one and older. Keep out of the reach of children. Marijuana should not be used by women who are pregnant or breast feeding.

AMCO Received 1/22/2019