Alcohol and Marijuana Control Office
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Anchorage, AK 99501
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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:	Barely Legal, Inc.	**MJ License #:**	17053		
License Type:	Retail Marijuana Store				
Doing Business As:	BARELY LEGAL, INC.				
Premises Address:	1036 E. 4TH AVE				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Mailing Address:	P.o. box 875737				
City:	Wasilla	**State:**	Alaska	**ZIP:**	99687

Designated Licensee:	Donald Brooks II		
Main Phone:	907-707-7687	**Cell Phone:**	
Email:	barelylegal907@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:

Each and every individual wishing to enter the retail store will be required to present an unaltered, valid, government issued, photo identification proving they are at least 21 years of age before even being allowed to enter the retail store. Barely Legal will have an employee stationed at the entrance to the retail store lobby and will not allow anyone to pass until their photo identification has been physically examined and age has been verified. The retail establishment will also have a security guard on duty during operating hours. Additionally, signage will be prominently posted on the entrance door stating "No One Under 21 Years of Age Allowed".

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:

Barely Legal' s retail store will be equipped with a 24 hour monitoring alarm system, exterior motion detecting lighting, and video surveillance. There is one customer entrance and one customer exit to better manage ingress and egress. There is a seperate door behind the sales counter in the restricted access area that allows for employees to access the rest of the facility. At least one employee will be present behind the point of sale/display counters at all times, ensuring customers do not enter the restricted access area behind the counter, as well an employee on duty to man the door and walk around checks around the property during operating hours and at closing time. The entrances to the restricted access areas behind the counters will have prominent signage stating that the area is restricted and that the public must be escorted. The door to the office will remain closed and locked at all times with a restricted access area sign posted. Security cameras will be installed throughout the retail store that allow for monitoring of all areas, 24 hours each day including, at a minimum: all entrances and exits, restricted access areas, all windows, every portion of the office, the point of sale area and the exterior of the building to monitor and identify all activity adjacent to the facility.

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

In order to be escorted into restricted access areas, a visitor must be pre-scheduled by either a Licensee, or a manager, with the exception of AMCO and duly authorized law enforcement agents. Each visitor will sign into the visitor's log indicating their name, the date, time in and out of the restricted access area, and purpose of the visit. All visitors will be required to sign in, and to provide valid, government issued, photo identification. Each visitor (with the exception of law enforcement, AMCO Enforcement or other duly authorized agents such as from the Anchorage Municipality or Health Dept) will be issued a visitor badge and will be instructed to clearly display it on their person at all times while on the licensed premises and return the badge upon exit. At this time, the employee or licensee will brief the visitor on the company's policy's regarding safety, regulatory compliance and any other pertinent information the visitor should be aware of while inside the restricted access areas of the retail store. A designated employee or licensee will escort and actively supervise the visitor(s) during the entire visit. At no time will there be more than 5 visitors per supervising employee or licensee on the premises. Once the visit has concluded, all visitors will be required to exit the premises and return their visitor badges. The visitors log will be kept and stored on-site as an official business record. The visitors will be escorted by an employee at all times while in the restricted access area. The escorting employee will record all information related to the visitor's presence, including any reportable activity or behavior during the visit. This visitor log will be made available to AMCO upon request. The records will be stored in the shared office located on the second floor of the building. After 7 years the hard copy may be destroyed.

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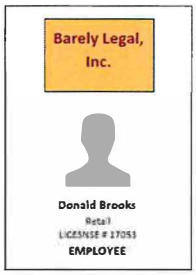
3.3. Provide samples of licensee-produced identification badges that will be displayed by each licensee, employee, or agent while on the premises, and of visitor identification badges that will be worn by all visitors while in restricted access areas:

*or similar format and content



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

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

Barely Legal will ensure that adequate exterior lighting is installed throughout the property and will be sufficient to facilitate video surveillance. They will install commercial, LED lights with extremely bright bulbs will be used in all exterior light fixtures as well as motion detection sensors. The licensees and/or management team will ensure light fixtures are installed in such a way to keep the exterior of the premises, signs and doors well lit and to allow surveillance cameras to clearly record individuals that are within twenty (20) feet from the entrance. Exterior lighting, as well as video surveillance recordings and cameras will be inspected frequently by the licensees and/or the management team to ensure that each light is functioning and there is sufficient lighting for surveillance. Additional lighting will be installed as/if needed.

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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:

Barely Legal will contract with a third party security company who will install the alarm system, panic buttons, maintain its equipment, test the devices and continuously monitor the facility 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. Licensee's and facility managers will be educated on the alarm system and panic buttons by the third party company. Company education will include all alarm functions, arming and disarming the system, panic buttons, police response, proper use of the system and troubleshooting. Each morning, the first employee to the store 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, and lock all doors and windows that are not self-locking. Sensors will be installed and maintained on all potential entry points, including all doors, and windows to monitor for motion, intrusion, or activity when the alarm system is activated. The alarm system will be active at all times that the store is closed, and any attempted intrusion will initiate an immediate and electronic notification to the off-site security center and to the Licensee's and/or the operations manager's cellular phones. Additionally, any event that occurs on the licensed premises that involves local law enforcement will be promptly reported to AMCO Enforcement via email in the case of the establishments knowledge of evidence or circumstances that reasonably indicate theft, diversion, or unexplained disappearance of marijuana, marijuana products, or money from the licensed premises; or any unauthorized access to the licensed premises, the licensees will notify AMCO and AMCO Enforcement within 24 hours.

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

All areas of the licensed retail premises where marijuana or marijuana products are stocked for sale or dispensed for sale and storage/ inventory areas will be designated as restricted access areas. Access is granted only to specific personnel to these restricted areas. These secured areas will have 24-hour video surveillance and video back up for all video footage and will be stored for a minimum of forty (40) days. When the business is open, all products will be on display in specific areas, unreachable to customers. Cameras will be visible and provide a full view of the room, including the entryway, point of sale counter and marijuana storage areas. Security monitors and video recording equipment will be located in the shared office on the second floor. Mandatory inventory counts will be taken weekly and stored as official business records. Additionally, management will perform internal audits by reconciling the inventory on hand with the recorded data in METRC to ensure they match. Continued on page 11

3.7. Describe your policies and procedures for preventing loitering:

Barely Legal will have a "No Loitering" sign clearly posted on the exterior of the retail establishment.

If an employee suspects that a person is loitering outside the store, they will be given a verbal warning that law enforcement will be notified and asked to leave the premises by an employee or Licensee. Employees will maintain a regular periodic check around the property to deter any individuals from loitering.

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. DB

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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. DB

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. DB

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

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). DB

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:

Multiple cameras will be used in order to record all areas of the establishment, inside and outside at multiple angles and at a height that will provide a clear, unobstructed view. Cameras will be carefully placed to prevent any blockage from fixtures, posts, display cases, or other equipment. All security cameras will be positioned in such a manner as to get the best facial image of anyone present within the building and within twenty (20) feet of the exterior entrance. The front entrance door of the facility as well as the exterior emergency exit door will have cameras documenting the face of anyone going in or out of the building. All restricted access doors will have coverage to clearly identify the face of anyone present. All exterior entrances and restricted access areas will have video coverage documenting the face of the individual entering the room. All exterior corners of the space will have cameras installed to facilitate monitoring of all activity on each side of the building. The parking lot and entrance will also have video coverage. Footage from security cameras will be accessible remotely, allowing Licensee's and the general manager to view operations from anywhere. A failure notification system will be installed to provide audible and visual notification of any failure in the electronic monitoring system. During a power outage, all video cameras and recording equipment will be run on emergency power with a battery backup system to ensure continued operation for at least one (1) hour.

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 office with backups on site. The office will be accessible only by Licensee's and the company's general manager, and any authorized AMCO agents or law enforcement. The office will have an advanced, reinforced security door, locked at all times. The door will be equipped a commercial grade lock with keys that are marked "do not duplicate" and a spring-loaded hinge. Licensee's and the general manager will have remote access to surveillance recordings to monitor operations virtually. The security system will be password protected to prevent any data tampering, and recorded data will be stored for a minimum of forty (40) days as an official business record. All surveillance footage will be accessible for upload to a separate hard drive in the event that it must be stored longer for criminal, civil, or administrative investigations. All recordings will be time and date stamped, and archived in a format that prevents alteration of the recorded image. Recordings and surveillance data will be available to the AMCO, AMCO Enforcement 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)*; DB

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;** DB

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

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

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

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

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

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;** DB

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

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

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 and marketing documents will be stored on-site in the office, and backed up every 6-12 months on an off-site external hard drive to protect from loss and destruction and to allow ownership and designated authorities access at any time. Hard copies (if original hard copy is needed to be kept in addition to electronic versions such as Visitors Logs) will be kept in the shared office, office will be shared w cultivation correct that is co-located and wholly owned by Barely Legal Inc, in a separate locked cabinet that is accessible only to the licensees and designated employees. Facility records will be managed by authorized agents in accordance with standard retention policies to ensure that business records are stored in a consistent and searchable manner. Every 6 months the company will do a manual backup to an external hard drive. The hard drive will be locked in the record cabinet located in the office. Hard copies of documents will be kept for at least seven (7) years and the company has no intention of destroying any electronic copies of the business records.

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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.

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

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.

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.

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.

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.

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

Qualified candidates will be hired on a probationary period during which time they will receive training and evaluation specific to their position. Training will include marijuana industry topics; customer care, food handling, safety precautions and procedures; legal issues; and state, local, and federal regulations. Training will take place throughout the year, as well as when topics arise that need further explanation. Licensee's and/or the general manager will personally present or arrange training and education to employees. Within the probationary period, all new employees will be required to meet with the general manager to learn the company's business approach and to adopt the standard of service. Educational packets will be provided to each retail employee to be read and reviewed.

Continued on Page 11

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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. DB

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. DB

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. DB

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). DB

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 products and receiving of products, the retail store will ensure the wholesaler has completed an accurate METRC generated Trip Manifest report. Even if the wholesaler is a co-located license in the same building, Barely Legal understands that a transfer, even inside the building, still requires a complete valid and accurate manifest report, and must inspect the inventory at the time it arrives and accept the inventory (provided it is not rejected) into its independent retail metrc system. All Trip Manifests will be sent with the products, and two copies will be provided to the retailer for signature on both copies. One copy will remain on the licensed premise of the retailer and the other will go back to the wholesaler licensed premises to be stored on the licensed premise area as official business records. Continued on Page 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. DB

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. DB

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. DB

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. DB

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. DB

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. DB

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

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):

Barely Legal will have two (2) signs with their business name and logo affixed to the front of the building as well on right front side of the building. A third sign may be free standing (only if the municipality of Anchorage changes Title 21 to allow for it). Each sign will be no more than 4,800 square inches and will be attached to the building.

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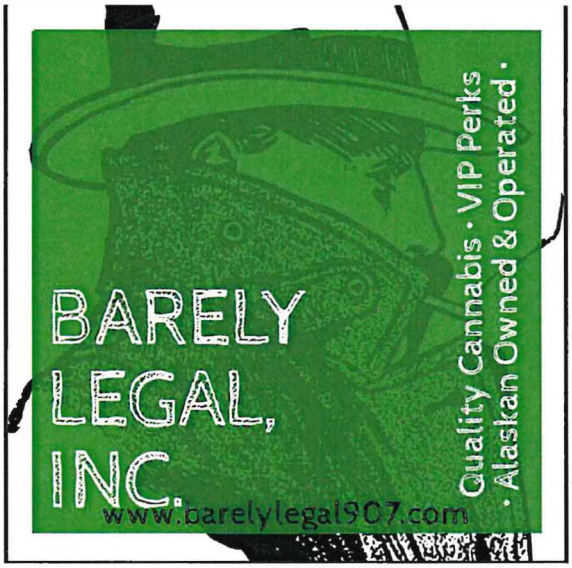
9.2. Describe any advertising you intend to distribute of your establishment. Include medium types and business logos (photos or drawings may be attached):

Barely Legals' advertising and marketing is still in development; however, the company plans to utilize the following medium types when distributing advertisements:
- Newspaper ads
- radio ads & TV
- social media to feature specific strains
- magazine ads

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



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

Signature of licensee

Printed name of licensee

VALERIE MASTOLIER
Notary Public
State of Alaska
My Commission Expires Jun 7, 2022

Notary Public in and for the State of Alaska

My commission expires: 4/7/22

Subscribed and sworn to before me this 7 day of August, 2018.

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(Additional Space as Needed):

3.6 Continued
Barely Legal understands that diversion can happen in two ways - inversion and diversion - and is equally profitable diverting product out of the legal system as it is diverting product from the illegal system into the legal market. 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, OR infusing the facility with non-regulated black-market product, Barely Legal will notify local law enforcement and AMCO enforcement immediately, comply with all directives, and provide all necessary information and records for the investigation. Licensee's and the general manager will take the necessary steps to ensure that illegal conduct by an employee does not compromise the facility's license and legitimate business operations. All employees will be trained to recognize potential theft, and are required to notify either a licensee, or management if they suspect such activity is occurring. All reports and documentation concerning a suspected or actual theft will be maintained by the company for five (5) years and made available to AMCO upon request. If any suspected or actual theft occurs, Licensee's or the general manager will contact local law enforcement and AMCO enforcement immediately. Once a theft is reported to law enforcement, management will update the product records in the marijuana inventory tracking system to maintain an accurate and comprehensive accounting for all marijuana inventory activity. Licensee's will also comply with any and all directives, inquiries, and investigations lodged by AMCO.

6.4 Continued
The educational packets will discuss relevant cannabinoids in the marijuana plant, strain ratios, marijuana benefits and risks, and general Alaska marijuana law. Packets will also include safety procedures that specifically address the facility's security measures and controls for the prevention of diversion, theft, and loss of marijuana such as emergency response procedures and state and federal statutes regarding confidentiality. As proper safety and security procedures are of the utmost importance to the Licensee's, the most up-to-date reading materials will be available to employees at all times. Management will conduct quarterly staff meetings with the purpose of updating all employees on new state and local regulations, assuring that each employee is performing within company procedure, assessing any procedural changes that are needed, and addressing any comments or concerns from the staff. Prior to beginning work, employees will be expected to understand: (1) Alaska laws, regulations, and codes governing the marijuana industry and marijuana establishments; (2) all of the permitting requirements to act as a marijuana handler (including obtaining a Marijuana Handler Permit from AMCO Enforcement after completing a state approved course prior to commencing employment) and to work in a marijuana establishment; (3) Barely Legal standards, operational protocol, and best practices with regard to retail and sale of marijuana; (4) general safety procedures and security protocol; (5) how to think defensively if threatening situations occur, and how to recognize the signs of impairment, drug abuse, and instability; (6) in-depth information about our particular strains and marijuana related products; (7) in-depth information on the requirements of each room, task, and system; (8) the general federal, state, and local employment regulations by which Barely Legal is governed; and (9) retail-specific education. To ensure full coverage for each position, all employees will be cross-trained on the requirements of each job. Barely Legal will encourage staff to attend seminars, conferences, and workshops, and Management will maintain a library of resources on marijuana topics, available to employees at all times. The state and local marijuana regulations and laws will be posted in the facility for reference. All new hires will be required to meet with the general manager to go over employment documents, specific tasks, educational materials, facility features, security and position-specific training.

8.1 Continued
Either a licensee or a designated agent at the retail premises will ensure that the Manifest documents clearly have the strain name, 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 products should arrive in a sealed package or container not exceeding five (5) pounds and be stored in a locked storage compartment within the transport vehicle (or if the transport occurs within the facility in an opaqued locked container carried by an agent who has the transport and copies of transport manifest on his/her person). The transport vehicle (or person) should travel directly between destinations without making any unnecessary stops and at no time during transit will marijuana products be directly visible to the public. All marijuana 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 direct (not to be re-packaged) sale to consumers will be child-resistant and unappealing to children or Barely Legal will ensure any product not conforming to the above will be placed in an opaque child resistant exit packaging prior to leaving the facility. All packaging done at the retail facility (if the product is delivered in bulk wholesale package) 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 will be stored in a secured area until ready for display or transport, and will be inspected, accepted or rejected, and recorded in an official log. Barely Legal will check all packages to make sure that they will keep all marijuana from contamination and will check to make sure that the packages will not impart any toxic or deleterious substance to marijuana. Barely Legal will use certified scales in compliance with the Alaska Weights and Measures Act, and will maintain registration and inspection reports at the facility which are available to AMCO at its request. All marijuana and marijuana products received at the retail facility, regardless from which wholesaler it comes from, shall be weighed and inventory count verified and recorded in a log and in metrc at the time of delivery. All usable marijuana sold to any marijuana establishment will be labeled with the following information: (1) the name and license number of the cultivation facility; (2) the date the marijuana was harvested; (3) the harvest batch number assigned to the marijuana; (4) the date the marijuana was packaged; (5) the net weight and the quantity of usable marijuana packaged in a standard of measure compatible with the inventory tracking system; (6) a complete list of all pesticides, fungicides, and herbicides used in the cultivation and preparation of the marijuana; and (7) the date of expiration if perishable; (8) testing results & date tested; and (9) required warnings (if packaged for retail sale). A label must be affixed to all shipping containers showing that a licensed marijuana testing facility has tested each harvest batch in the shipment . The label will list: (1) the date of final testing; (2) the cannabinoid potency profile, expressed as a range of percentages (3) a statement listing the results of microbial testing; {4) a statement listing the results of residual solvent testing, as applicable; and (5) a statement listing the contaminants for which the product was tested, including molds, mildew, filth, herbicides, pecticides. fungicides, and harmful chemicals. All transporting vehicles storing marijuana products will be unmarked and inconspicuous. Marijuana transportation vehicles will contain a secure and sanitary area established within the transportation vehicles that will lock and will ensure that the products cannot be seen by anyone from outside of the transportation vehicle and to guarantee no access to any unauthorized person trying to access the marijuana and marijuana products. The secure storage within the transportation vehicle will be sanitized before and after each use. Prior to departure a manager will ensure all marijuana is in sealed packaging, and locked in the secure storage compartments of the transport vehicle. Under no circumstance will a sealed package containing marijuana be opened during transportation. The structure will be formed of steel, hard plastic or like materials. From time to time ownership may utilize a third party for transport and shall ensure the third party transport company has their Marijuana Handlers' card.

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