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:	Raspberry Roots, LLC	**MJ License #:**	10856		
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	RASPBERRY ROOTS				
Premises Address:	501 Raspberry Road, Suite 102				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Mailing Address:	501 Raspberry Road, Suite 102				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99501

Designated Licensee:	Kimberley Kole		
Main Phone:	907-727-6584	**Cell Phone:**	
Email:	kim@raspberryroots.com		

Received by AMCO 12/14/18

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:

Raspberry Roots entire manufacturing facility is designated as restricted access area with signs posted on and around the building stating "Restricted Access Area: Visitors Must Be Escorted" as well as signs stating, "No One Under 21 Year of Age Allowed" and "Video and Audio Surveillance in Progress". Only employees working directly in the Manufacturing Department will be allowed in the licensed area with the exception of law enforcement, AMCO Enforcement or other duly authorized individuals. Manufacturing is located on the second floor of the building, so a person must pass through multiple Restricted Access doors and through the Cultivation or the Retail to access it. Any visitors to the facility, with the exception of law enforcement, AMCO Enforcement or other duly authorized individuals, must be prearranged with a licensee or member of the management team. Visitors will be required to produce a valid, government issued, photo ID proving they are at least 21 years of age before being allowed to enter the premises. Any individual that does not produce said ID will be informed to exit the property immediately and that law enforcement will be contacted for back up if they do not comply promptly.The pre approved visitor is greeted at the receptionist desk where an employee checks state issued IDs to ensure they are over the age of 21. They then sign into the Visitor's Log, wear a Visitor's badge, and are escorted by an employee (at a ratio of no more than 5 guests per employee) the whole time they are in the Restricted Access areas.

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:

Maintaining the security of all marijuana products requires that access to the premises be monitored and restricted. There are multiple Restricted Access signs leading to Manufacturing. From the buildings point of entry, there is a secure door at the top of the stairs leading to the cultivation (which leads to manufacturing) that is always locked with a spring loaded hinge to ensure it closes behind people as they enter or leave the secured area. The other entry point to Manufacturing is inaccessible from the public. There is however a Restricted Access sign posted on the door. Conspicuous cameras are placed to encourage people to not attempt access. The facility is equipped with an alarm system and video surveillance are installed throughout the premises that allow for monitoring all areas 24 hours each day, including all entrances and exits, all security doors and restricted access areas, offices, security room, windows, and the exterior of the building to monitor and identify all activity adjacent to the facility. All employees will be required to clearly display on their person an employee ID badge bearing their photograph at all times while on the licensed premises. Employees will also be required to either keep their marijuana handler permit on their person during working hours or filed onsite. All visitors will be required to sign in to the visitor log and clearly display on their person a visitor badge at all times while on the premises. This will help everyone to easily identify individuals that have been authorized to access the premises.

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

With the exception of law enforcement, AMCO Enforcement or other duly authorized agent, all visitors will be required to pre arrange their visit with a licensee or member of the Raspberry Roots management team. Visitors will be instructed to arrive at the retail store main entrance where a designated employee or licensee will meet the individual at the front entrance door and will immediately ask to see their valid, government issued, photo identification regardless of how familiar the employee or licensee is with the potential visitor. Once the age and identity of the individual has been confirmed as being at least 21 years of age and a pre arranged visitor or duly authorized agent, they will be allowed to enter the building where they will be escorted to the waiting room at the front entrance where they will log into the Visitor's Log and obtain a visitors badge, which they wear throughout the duration of their visit. Visitors will always be escorted by an employee while on the premises (at a ratio of no more than 5 guests per employee), and the visitor's badge is returned to the front desk upon departure. The Visitor's Log includes the guest's name, organization, purpose of the visit, date, and time in and out of the facility. This will be made available to AMCO and AMCO enforcement upon request.

Received by AMCO 12.14.18

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:

The employee badges contain the Raspberry Roots name, logo, the employee's name, as well as a color photograph of them as shown below. The visitor's badge contains the Raspberry Roots name, logo, and the Visitor number, also shown below. *or similar format and content

RASPBERRY ROOTS

Kim Kole

RASPBERRY ROOTS

Visitor
1

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:

The exterior of the building is well lit. Exterior lighting is specially designed and positioned to help vis ually secure the premises and allow the surveillance system to depict individuals up to twenty feet fr om all entry points. The luminaries are mounted in inaccessible places and have sturdy housings an d lenses. The lights are extremely bright LEDs, emitting high lumens, to deter crime and to ensure m aximum visibility. These are checked daily by management to ensure that each light is operational to deter loitering or unauthorized presence on the premises.

Received by AMCO 12.14.18

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 was installed by Cardoso Integrated Security (CIS) and has a 3rd party monitoring company (Alarm.com) monitoring the premise activity at all times to ensure the safety of the agents and assets, and to detect any unauthorized intrusion or activity. When an alarm is triggered, Kim or Jerry is called by the monitoring company before contacting local law enforcement, if necessary. Alarm testing will be executed every 6 months. The security system has a user friendly software that allows for playback, still frame pictures, and slow/fast motions. The footage can be accessed through a computer or phone, by upper management only, without being present at the location. The security equipment has been installed with enough hard drive storage capacity to preserve recordings for over 40 days. As more cameras get added, Raspberry Roots will continually verify that the storage capacity maintains 40 days of back up or more. During closed hours, the system will always be activated, and it monitors all exterior doors and windows. It also includes interior motion and glass break detectors. Any unauthorized intrusion or attempted intrusion will send an automatic call to licensee's, who will determine if a call to local law enforcement is warranted. In the e vent that the alarm system sends an electronic alert to local law enforcement to notify them of an unauthorized breach, the management team will evacuate the building (if it's safe to do and necessary) to a predetermined safe location. A designated employee will take a head count of employees and any visitors that may have been on the premises to ensure everyone is accounted for. Management will await instruction from law enforcement and comply with all directives. Once it is safe to do so, employees will return to the facility and inspect for property damage, theft, take inventory and submit all necessary and requested documentation to law enforcement officials and to AMCO enforcement. Additionally, when the first Manager or Licensee arrives, they will disable the alarm and check that the cameras are functioning by viewing them in the security office. The last agent to leave at the end of the night will activate the overnight security system (doors, windows, motions sensors, glass breaks) and ensure that all doors are locked. Windows in the Raspberry Roots facility will never be opened. The facility is equipped with strategically placed panic buttons available to all employees in case of emergency. The whereabouts and information regarding the panic buttons is part of the employee training. Any event t hat occurs on the licensed premises that involves local law enforcement will be promptly reported to AMCO Enforcement via email. Continued on Page 11

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

SEE PAGE 11 "(ADDITIONAL SPACE AS NEEDED)"

3.7. Describe your policies and procedures for preventing loitering:

A "No Loitering" sign is posted on the exterior of the building. Loitering outside the establishment will be met with a request from company agents to leave the premises. The loitering individual would then be given a verbal warning that law enforcement will be notified if they do not comply. The last resort would be to reach out to law enforcement personnel for assistance. Licensee's and Managers will work with the security company and local law enforcement, if necessary, to secure the premises, prevent business practices which could entice or allow loitering, and escort all loitering individuals off premises as soon as possible.

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. KAK

Received by AMCO 12.14.18

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. KAK

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. KAK

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

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). KAK

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 are used 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 are carefully placed to prevent any blockage from fixtures or other equipment. To ensure clear views for identity, there are cameras positioned in such a manner as to get the best facial image of anyone present within the building and within 20 feet of the exterior entrances. All interior and exterior doors, plus the checkin area (for retail and visitors) has coverage to clearly identify the face of anyone entering or leaving a room. Footage from security cameras are accessible remotely, allowing Licensee's 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:

The surveillance recording equipment and records are stored in the Security Office. It has an advanced, reinforced security door, and remains locked at all times when unoccupied by Manager. There are two different levels of key access. Managers and Leads have a key to open most doors that are lower security, such as the restricted access door between retail and cultivation. Only the Licensee's and select Managers have access to the Security and Inventory Offices, which remain locked when someone is not present. The door has a spring loaded hinge to ensure closing behind people as they leave. The security system is password protected, and only known to a select few, so data cannot be tampered. Data is stored on the security system's DVR for a minimum of 40 days and it can be uploaded to a separate hard drive to maintain records for longer than 40 days if there is a pending criminal, civil, or administrative investigation. The recordings include the time and date stamp and are archived in a format that doesn't permit alteration of the recorded image. Recordings are available to AMCO, AMCO Enforcement, and local law enforcement upon request.

Received by AMCO 12.14.18

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)*; KAK

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;** KAK

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

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

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

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

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

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;** KAK

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

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

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 surveillance recording equipment and footage will be stored in the shared 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 licensee's 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. Employees managing facility records will be trained in standard retention policies to ensure that all records are maintained and filed in a consistent and searchable fashion until they may be destroyed.

Received by AMCO 12.14.18

Section 5 – Inventory Tracking of All Marijuana and Marijuana Product

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

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

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

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

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. CAK

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. CAK

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. CAK

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. CAK

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

Manufacturing Techs will shadow the Production Lead for a period of time for each assignment to ensure that the machines are used and cared for properly, and to learn the processes to create the various types of marijuana products. Those making the edibles, lotions, etc will also be tr ained on how to create homogeneous mixtures for dosing and the recipes for the final products. Only the Production and Culinary Leads will e nter data into Metrc, and this is taught directly by a Licensee. All employees are trained in safety and emergency protocols. Prior to beginning work, employees will be expected to understand: (1) Alaska laws, regulations, and codes governing the marijuana industry and marijuana estab lishments; (2) all of the permitting requirements to act as a marijuana handler (including obtaining a Marijuana Handler permit from AMCO Enf orcement after completing a state approved course prior to commencing employment) and to work in a marijuana establishment; (3) Raspberr y Roots standards, operational protocol, and best practices with regard to all phases of manufacturing and the sale of marijuana; (4) general saf ety procedures and security protocol; (5) how to think defensively if threatening situations occur, and how to recognize the signs of impairmen t, drug abuse, and instability in coworkers; (6) indepth information about our particular products; (7) indepth information on the requirements of each room, task, and system; (8) the general federal, state, and local employment regulations by which Raspberry Roots is governed; and (9) manufacturingspecific education, which includes handling of hazardous materials. A hazardous material safety guide will be stored on site in ca se of an emergency.

Received by AMCO 12.14.18

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. KMK

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. KMK

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. KMK

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). KMK

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:

SEE PAGE 11 "(ADDITIONAL SPACE AS NEEDED)"

Received by AMCO 12.14.18

Form MJ-01: Marijuana Establishment Operating Plan

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. KAK

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. KAK

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. KAK

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. KAK

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. KAK

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. KAK

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

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):

In the future, Raspberry Roots will have a sign on the front of the building, measuring 4 ft x 8 ft. It wil l have the words "Raspberry Roots" and the logo, and potentially the tag-line "not your average berr y..."

RASPBERRY ROOTS

RASPBERRY ROOTS

Received by AMCO 12.14.18

Form MJ-01: Marijuana Establishment Operating Plan

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

Raspberry Roots uses print and digital media. This could include the name of Raspberry Roots and the tagline "not your average berry…" along with the logo shown below. Also, we may release product specific advertising that are similar to logos below. The content of the advertising will be dependent on the media platform and the time of year since we incorporate a holiday or local event. However, it will NOT contain any statements or illustrations that are false or misleading, promote excessive consumption, indicate that marijuana has curative or therapeutic effects, depict a person under 21 years of age, or include any object or character targeted to a person under 21. They will not be placed within 1000 feet of any child centered facility, playgrounds or recreational centers, public parks, libraries, substance abuse or treatment facility, or game arcades open to people under 21 years of age. They will not be on any publicly owned or operated property, or any campus for posted secondary education. They will not include any giveaway coupons or games.
Advertisements will include each warning statement verbatim as they are listed in the regulations.

RASPBERRY ROOTS

NORTHERN Delights

MOOSE TURDS

CANAMO CONCENTRATES

TWISTED TUNDRA

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

Signature of licensee

Kimberley A. Kole
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: 6/7/22

Subscribed and sworn to before me this 13 day of December, 2018.

Received by AMCO 12.14.18

(Additional Space as Needed):

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:

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.

SECTION 3.6

All areas of the licensed premises where marijuana or marijuana products are stocked for sale or dispensed for sale and s torage / inventory areas will be designated as restricted access areas. Access is granted only to specific personnel to thes e restricted areas. Marijuana products are stored in a secured, locked area during closed business hours. The Manufactu ring Department will sign out the needed material and bring it to the Manufacturing licensed area for processing. There i s 24 hour video surveillance and video back up for all footage, that is stored for 40 days. Security monitors and video rec ording equipment are in the Security Office. Mandatory inventory counts are conducted and stored as business records. If an employee is caught stealing or illegally distributing marijuana, Raspberry Roots will cooperate as needed with the a ppropriate law enforcement agencies in the Municipality of Anchorage and / or the State of Alaska. Employees found to be diverting marijuana could be arrested and punished to the full extent of the law, and Raspberry Roots will cooperate with all law enforcement directives. All employees are trained to recognize potential theft and are required to notify Ow nership 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 5 years and made available to AMCO and its agents and representa tives upon request. If any suspected or actual theft occurs, Ownership will contact local law enforcement immediately. A dditionally, Ownership will take such steps appropriate and necessary to ensure that an employee's illegal conduct does not compromise or otherwise present a risk to the facility's license and legitimate business operations. Once a theft is re ported to law enforcement, Ownership will update the product records in Metrc to maintain an accurate and comprehen sive accounting for all marijuana inventory activity. Ownership will also comply with all directives, inquiries and investiga tions lodged by the Marijuana Control Board, AMCO, and AMCO Enforcement.

SECTION 8.1

For all transports of marijuana, Raspberry Roots will create a Metrc generated Trip Manifest. All Trip Manifests will be sent with the products, and an additional copy will be stored and filed on the premises as official business records. The Manifest documents will clearly have the strain name, type of product, batch number, weight, name of the transporter and handlers ID, time of departure a nd expected delivery, and the make, model, and license plate of the transporting vehicle. All marijuana product will be in a sealed p ackage or container not exceeding five (5) pounds and then stored in a secured storage compartment within the transport vehicle. The transport vehicle will travel directly between destinations without making any unnecessary stops and at no time during transit will marijuana products be directly visible. All marijuana packaging will have a label stating that a licensed testing facility has tested each batch in the shipment. All packaging materials that will be sold to marijuana establishments for sale to consumers will be child proof and unappealing to children. All packaging done at the facility will be performed in a specific 24hour surveillance monitored a rea and will then be packaged in a uniform manner with labels secure and clearly displayed. Packaged marijuana products will be st ored in a secured area until ready for transport, and will be inspected, accepted or rejected, and recorded in an official log. The co mpany will check all packages to make sure that they will keep all marijuana products from contamination and will check to make s ure that the packages will not impart any toxic or deleterious substance to marijuana products. Raspberry Roots will use certified sc ales in compliance with the Alaska Weights and Measures Act, and will maintain registration and inspection reports at the facility. R eports will be available upon request to AMCO. The transport vehicle will be unmarked and inconspicuous with a secure storage co mpartment inside or in the bed of a truck, or the trunk of a car, to hold all marijuana products during transit. The manager will ensu re that the marijuana is locked in the storage compartment and not visible from the outside, prior to approving departure. All empl oyees will be trained that under no circumstances shall a sealed package containing marijuana be opened during transport, unless otherwise directed by a local law enforcement agent.

Received by AMCO 12.14.18